
	<b>Guidelines for the Management and Prevention of Conflicts of Interest and Ethical Conflicts</b>		
	<b>Compliance Management System Corporate Compliance Office</b>		
	<b>Code SCU-I-001</b>	<b>Prepared by 28/01/2025</b>	<b>Version: 1</b>

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## 1. OBJECTIVE

This guideline aims to establish the directives for the proper identification, disclosure, and management of conflicts of interest and/or ethical conflicts at Ecopetrol S.A. (hereinafter "Ecopetrol"), in accordance with the provisions of the Political Constitution, the law, the corporate bylaws, the Codes of Ethics and Conduct<sup>1</sup>, and all other internal and external regulations that amend, supplement, or add thereto.

## 2. GENERAL CONDITIONS

### 2.1. Scope:

This document is aimed at the addressees of the Codes of Ethics and Conduct of Ecopetrol, who must apply the directives established herein in order to properly manage situations involving conflicts of interest or ethical conflicts in the course of their activities.

Consequently, it is the responsibility of the person affected by the conflict to make the disclosure in the terms contained herein. Meanwhile, those responsible for evaluating the statements made under this guideline must assess the matter immediately, formally, and sufficiently, and ensure that their opinion is duly recorded in SuccessFactors or through the channel established for that purpose.

This guideline serves as a reference for the companies of the Ecopetrol Group, which are required to establish measures for the proper identification, disclosure, and management of conflicts of interest and ethical conflicts, in compliance with applicable law, the Ecopetrol Group's Codes of Ethics and Conduct, the directives issued by the Corporate Compliance Office, and any other regulations applicable to each company in accordance with its structure and legal nature.

### 2.2. Térms and definitions:

The terms and definitions associated with the interpretation of this Guideline are contained [Glosario Corporativo de Ecopetrol S.A.](#)

## 3. DEVELOPMET


### 3.1. Types of conflicts

#### 3.1.1. Conflict of interest

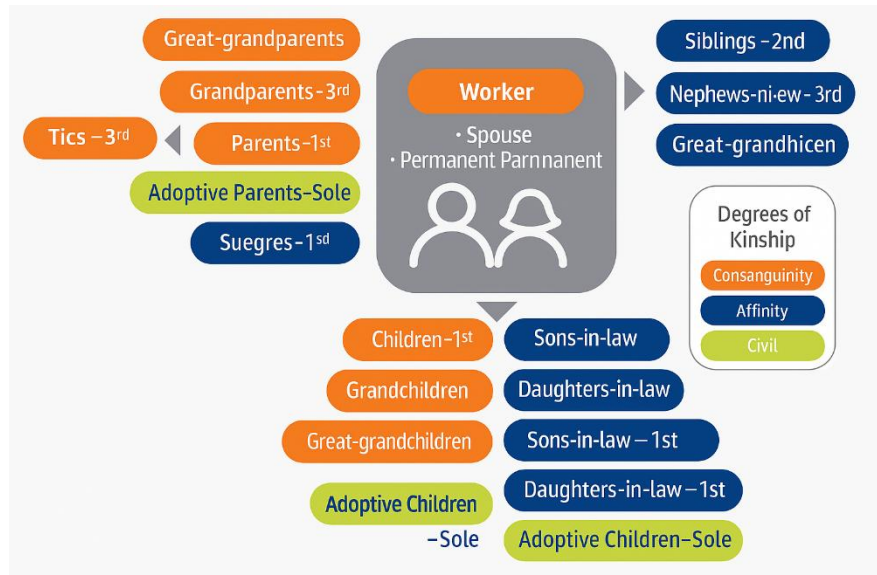
It is the situation that arises<sup>2</sup> when an individual has a specific and direct interest in the regulation, management, oversight, or decision-making of a matter under their responsibility, or when such interest is held by their spouse, permanent partner, or any of their relatives within the fourth degree of

<sup>1</sup> This expression refers to (i) the Code of Ethics and Conduct for Members of the Board of Directors, Employees, and their Beneficiaries, and (ii) the Code of Ethics and Conduct for all natural and legal persons who have any relationship with the Company, including contractors, suppliers, agents, partners, customers, allies, and the personnel and companies that contractors may engage to perform the agreed activities.

<sup>2</sup>In accordance with the provisions set forth in the Political Constitution and the law—including, among others, the General Disciplinary Code or any regulation that amends or replaces it.

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consanguinity<sup>3</sup>, second degree of affinity<sup>4</sup>, or first civil degree<sup>5</sup>, or by their de facto<sup>6</sup> or de jure<sup>7</sup> partner(s).



### 3.1.2. Ethical conflict

It refers to any situation or circumstance that undermines objectivity, equity, independence, or impartiality in the performance of functions and/or activities due to the existence of a private interest, whether personal or third-party, which (i) is contrary to the interests of Ecopetrol S.A., or (ii) could result in an undue benefit and/or detriment to Ecopetrol S.A., third parties, or the involved worker.

### 3.2. Classification of conflicts of interest or ethical conflicts

Depending on the triggering event and the time at which they occur, conflicts of interest or ethical conflicts may be classified into the following non-exclusive and non-mutually exclusive categories:

- **Permanent:** when the condition persists over time by operation of law; by judicial or administrative decision; due to the relationship with the company; due to the interest held in the matter subject to decision; or due to the relationship with the person who has an interest therein.
- **Temporary:** those that arise when the event that gives rise to them is occasional, is limited to a specific matter, and does not persist over time.
- **Direct:** When the interest in the matter pertains to the individual who participates in, manages, or is responsible for the decision-making process.


<sup>3</sup> Parents, children, siblings, grandparents, great-grandparents, grandchildren, great-grandchildren, uncles, nephews or nieces, or cousins.

<sup>4</sup> Parents-in-law, sons-in-law, daughters-in-law, or siblings-in-law.

<sup>5</sup> Adoptive parents or adopted children.

<sup>6</sup> Those with whom a partnership has been established that has not been formalized by public deed, pursuant to Article 498 of the Commercial Code.

<sup>7</sup> Those with respect to whom a formally and legally constituted partnership exists.

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- **Indirect:** when the interest in the matter is held by a third party with whom the individual in charge of processing the matter or responsible for adopting the decision maintains a legal, contractual, juridical, or personal relationship, or a close relationship of friendship or enmity that exceeds reasonable human interactions.
- **Actual (Real):** when there is a present, current, and specific situation in which the worker must take action or adopt a decision but has a particular interest that could affect their impartiality, independence, fairness, or objectivity at the time of performing such action or making such decision.
- **Potential:** when there is a particular interest that could affect the worker's impartiality, independence, or objectivity, but the worker is not facing a present, current, and specific situation in which they are required to take action or adopt a decision.
- **Apparent:** when no particular interest is evident; however, someone could consider, even on a tentative basis, that such an interest exists. In such cases, explanations must be provided to clarify the situation, or the corresponding measures must be adopted to prevent any negative impact on the perception of the transparency of the process.


### 3.3. Conflicts of interest categorized as prohibitions, disqualifications, and incompatibilities

Disqualifications are prohibitions that determine the incapacity of certain individuals to be elected or appointed to a public position, to hold such positions, to fulfill public functions, or to enter into contracts with entities in which the State has an ownership interest. In turn, incompatibilities entail the impossibility for the same individual to carry out certain activities or to simultaneously exercise the powers inherent to the function they perform and those corresponding to other positions or jobs, or to maintain two relationships or hold two positions at the same time.

In accordance with the provisions set forth in the Codes of Ethics and Conduct; the Company's bylaws; Chapter VIII of Ecopetrol's Corporate Governance Code; the Board of Directors' Regulations; and the regime of disqualifications and incompatibilities applicable to public procurement—applicable to Ecopetrol pursuant to Article 13 of Law 1150 of 2007, as well as the laws that amend or supplement it—it shall be understood that this guideline includes those disqualifications and incompatibilities established by the Political Constitution, the law, and internal regulations, among others:

- The disqualifications set forth in Articles 127 and 128 of the Political Constitution of 1991.
- The disqualifications provided for in Articles 8 and 9 of Law 80 of 1993.
- The duty of directors and officers to refrain from participating in decision-making processes, as defined in paragraph 7 of Article 23 of Law 222 of 1995.
- Those indicated by Articles 42 and 43 of Law 1952 of 2019.
- The disqualification for contracting derived from Article 5 of Law 828 of 2003.
- The grounds for conflict of interest contained in Article 11 of Law 1437 of 2011.
- The disqualifications contained in Articles 1 through 4 of Law 1474 of 2011.
- All those provisions that modify or repeal the the provisions set forth in this guideline.

Although they are legal in nature, the configuration of a disqualification or incompatibility may generate a conflict of interest or an ethical conflict, in violation of the provisions set forth in the Codes of Ethics and Conduct. For this reason, in circumstances that represent a risk of a conflict of interest or ethical conflict and/or a compliance risk related to the disqualifications or incompatibilities regime, guidance may be sought through the Ethics Line, in order to prevent its materialization and/or to adopt the

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remediation or response measures, as may be appropriate.

### 3.4. Situations that may constitute a conflict of interest or an ethical conflict


At Ecopetrol, those who find themselves in any of the following situations, among others, must refrain from acting or deciding — and must make the corresponding disclosure.

- When an individual is responsible for making any decision, or has influence over or participates in matters in which their spouse, permanent partner, or any person with whom they have a kinship relationship up to the fourth degree of consanguinity, second degree of affinity, or first civil degree is involved, or when the individual is a de facto or de jure partner<sup>8</sup>

Such matters may include:


- Definition of commercial or business strategies.
  - Definition of suppliers invited to selection or award methods.
  - Personnel selection or hiring processes.
  - Goods or services procurement processes.
  - Share trading or stock negotiation processes.
  - Processes for defining technical or economic conditions.
  - Reserve classification processes.
- When an individual is responsible for regulating, managing, overseeing, deciding, participating in, or intervening in matters in which a person with whom the individual has a close friendship or a serious enmity holds a direct interest. Such matters may include any of the processes listed in the preceding item.
  - When a non-profit organization is involved in the matter, and the individual holds or has at any time held the status of founder and/or member thereof.
  - When a natural person or legal entity involved in the matter maintains a commercial or business relationship with the individual that is unrelated to the duties performed at Ecopetrol.
  - When the individual is participating in any procedure—regardless of its nature—in which the individual, or any of the persons mentioned in the first case of this section, may hold a direct interest or hold such interest through a third party, whether a natural person or entities such as companies, partnerships, corporations, foundations, or similar entities, in which they have an ownership interest or exercise any type of function.
  - This situation may also arise when relatives are assigned to the same area of the company and interact in the performance of their functions, or when they are in a situation of subordination, dependency, supervision, or any type of relationship that requires review or approval by one over the other, regardless of the degree of kinship.
  - • When there is an ongoing dispute or controversy (civil, police, administrative, or judicial) between the worker, their spouse or permanent partner, or relatives up to the fourth degree of consanguinity, second degree of affinity, or first civil degree, or their de facto or de jure partner, and any of the parties with an interest in the matter under review.
  - When, during a due diligence process or in a situation that requires the review or analysis of a counterparty for the purpose of making a decision, the individual has a relationship, close friendship,

<sup>8</sup> In accordance with the provisions of Article 126 of the Political Constitution.

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or enmity with a natural person who is directly linked to or associated with the legal entity (counterparty), or when such person falls within the relationships listed in Article 3.1 of this guideline.

- When any of the parties involved in the proceeding, their legal representative or attorney-in-fact, has filed a criminal or disciplinary complaint against the individual in charge of the procedure or decision, or against any of their relatives up to the fourth degree of consanguinity, second degree of affinity, and/or first civil degree, either prior to the initiation of the proceeding or thereafter, provided that the complaint refers to facts unrelated to the proceeding and that the reported individual is formally bound to the criminal or disciplinary investigation. This situation shall also be understood to exist when the Ecopetrol worker or any of the aforementioned relatives files a complaint against any of the parties involved in the proceeding.
- In cases where there is close interaction between two or more individuals due to ties of close friendship or enmity, personal or family business relationships, or where they act as creditors or debtors, among others. This type of conflict does not refer to reasonable human relationships, such as mere prior acquaintance, collegiality, or general feelings of trust.
- When an individual has specific knowledge about a counterparty, bidder, or participant in a given proceeding, or about their business or product, and such knowledge may give rise to an undue advantage or favoritism in a specific procedure or process.
- When an individual participates in personal activities that generate or may generate an opposition or conflict with Ecopetrol's interests, for example, when the individual maintains ties, under any capacity, with for-profit and/or non-profit companies or organizations, or engages in advisory activities, and in which Ecopetrol has or may have an interest—or vice versa. The foregoing shall be without prejudice to the obligation to comply with any restrictions agreed upon in the exclusivity labor clause, where applicable, as well as the limitations established under the regime of disqualifications and incompatibilities.
- In situations in which a bidder submits a proposal in a process to execute a contract that is related to another contract or agreement that has been previously executed or awarded to the same bidder.
- With respect to the management of private interests by former employees, the following rules set forth in Law 1952 of 2019—or those that amend or repeal it—shall be taken into account:
  - They may not, either personally or through an intermediary, provide services of assistance, representation, or advisory in matters related to the functions inherent to their position, nor allow such activities to occur, for a period of up to one (1) year after leaving the position, with respect to Ecopetrol S.A.
  - In any event, this prohibition shall be permanent with respect to the specific matters that the former employee became aware of in the performance of their duties.
- When a former employee of Ecopetrol S.A. who separated from the company during the immediately preceding year intervenes in the matter as a representative of the counterparty; or on an indefinite basis, when the former employee:
  - Manages specific matters that they became aware of at any time in connection with the functions they performed at Ecopetrol S.A.; or
  - Manages specific matters that they became aware of at any time in connection with the functions they performed at Ecopetrol S.A.; or
  - Maintains close ties of friendship or enmity with Ecopetrol S.A. employees who intervene in the matter and that exceed reasonable human relationships.
- When a worker of Ecopetrol S.A. intervenes in the matter and has separated from the involved counterparty less than one year prior; or on an indefinite basis, when the worker:
  - Manages matters at Ecopetrol S.A. that they became aware of at any time in connection with the functions they performed for their former employer;

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- Has had access to confidential or privileged information regarding the matter in question in connection with the functions performed for their former employer, which may give rise to an undue advantage in favor of Ecopetrol S.A.; o
- Maintains close ties of friendship or enmity with employees or representatives of their former employer that exceed reasonable human relationships.
- In cases where any of the interested parties in the administrative proceeding acts as a representative, attorney-in-fact, employee, agent, or business administrator of the public servant.
- When, at any time, the worker is responsible for deciding on or managing matters in which a former hierarchical superior—whether at Ecopetrol or at another company, entity, or body (public or private)—has a direct or indirect interest that is contrary to the interests of Ecopetrol.
- When the individual responsible for the procedure or management receives or has received gifts, tokens of appreciation, gratuities, favors, invitations, or any other type of benefit from the party interested in the matter, in violation of the applicable internal regulations.

### 3.5. Duties in the event of a conflict situation

The existence of a conflict gives rise to the following duties for the individual involved:

- **Duty to Abstain:** To immediately refrain from intervening in and/or participating in the matter in question.
- **duty of Disclosure:** To report or disclose the situation in accordance with the provisions set forth in this guideline.
- **Duty of Confidentiality:** Not to provide any information that may have been obtained regarding the matter to any unauthorized third party.
- **duty of Management:** To adopt reasonable management measures within one's reach in order to prevent the materialization of the risk.
- **Duty of Loyalty:** To prioritize the interests of Ecopetrol S.A. over any private interest.

### 3.6. Duty of disclosure

To fulfill the duty of disclosure, the addressees of this guideline must proceed as described below:


#### 3.6.1. Directors/Administrators

Persons who hold the status of directors/administrators of Ecopetrol must comply with the provisions of the Ecopetrol Bylaws, the Board of Directors Regulations, and the Good Governance Code — or the rules that amend or repeal them.

Furthermore, those who are Ecopetrol workers acting as directors of other companies in the Business Group shall present the conflict situation before the corresponding Board of Directors, submitting all relevant information for decision-making. They may also present at the same session, in order to comply with paragraph 7 of Article 23 of Law 222 of 1995.

As established by Article 22 of Law 222 of 1995 — or the law that amends or repeals it — directors of the company include members of the Board of Directors, the legal representative, the liquidator, the factor, and those who, according to the bylaws, exercise or hold such functions.

#### 3.6.2. Jod applicants

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Candidates or job applicants must report their conflicts in accordance with the procedure established in the Human Talent Selection Guide (GTH-G-056).

### 3.6.3. Employees

Ecopetrol employees must declare the conflict of interest or ethical conflict situation to their immediate supervisor through the SuccessFactors Employee Central tool. Each time an employee submits a report, the information is automatically sent to their immediate supervisor, who shall determine in writing whether a conflict exists in the matter and, if so, define the measures required for its effective management.

Before issuing their response, the employee's immediate supervisor may request any information deemed necessary and, in case of doubt, may consult the Ethics and Compliance Management Office through the Ethics Line in order to obtain guidance.

For the purposes of issuing their conclusion on the matter, the immediate supervisor must consider: (i) the description or details of the involved employee functions; (ii) the information available regarding the matter; (iii) the magnitude of the risk; (iv) the consequences in the event of risk materialization; (v) the scope and effectiveness of implemented controls; and (vi) the applicable regulations, including those established in this Guideline.

The employee's immediate supervisor must issue their response within five (5) business days following receipt of the notification of the report made by the employee, without prejudice to the employee's duty of recusal regarding the matter.

Some measures that the immediate supervisor's response could include, or that they could adopt or manage as determined necessary and reasonable to effectively manage the identified conflict risk, are:

- Prohibition from intervening in the matter
- Reassignment or change of functions
- Segregation of duties.
- Dual supervision over the matter.
- Notification to the authorized official or to the professional responsible for contract monitoring, if it becomes necessary for an involved counterparty to also adopt its own management measures.

Both the report and the immediate supervisor's response may be consulted and downloaded by the Ethics and Compliance Management Office.


All employees are obligated to immediately report any supervening situation through Employee Central, as well as to comply with the other duties referenced in Section 3.3.

The reporting tool is available through the following link:

<https://performancemanager8.successfactors.com/sf/home>

### 3.6.4. Bidders, contractors, suppliers, clients, partners or allies

Bidders selected by Ecopetrol must complete the commitment to contractual integrity, in which they

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must disclose any conflict of interest or ethical conflict situation.

If a counterparty identifies a situation that may represent a conflict-of-interest risk for Ecopetrol S.A. during the term of an agreement or contract, they must: assess the situation according to their own policies and procedures; and, if a conflict risk for Ecopetrol S.A. is identified, report it in writing to the contractual follow-up professional designated by Ecopetrol.

Said officer shall analyze the reported situation and provide a written and reasoned response, defining whether or not a conflict of interest or ethical conflict risk exists. Likewise, they shall establish mitigation measures, if applicable.

A record of the foregoing shall be kept in the respective process and a copy shall be sent to the Ethics and Compliance Department at [reporteconflictointeres-regalos@ecopetrol.com.co](mailto:reporteconflictointeres-regalos@ecopetrol.com.co)

In any case, the contract monitoring professional—or whoever is responsible, as applicable—may request guidance from the Corporate Compliance Directorate—or the area acting in its capacity—through the Ethics Line.

### **3.7. Preventive mechanism (dilemma)**

When there are doubts regarding the existence of a conflict-of-interest risk, an ethical dilemma shall be submitted through the Ethics Line ([lineaetica.ecopetrol.com.co](mailto:lineaetica.ecopetrol.com.co)) in order to obtain advice or guidance.

In any case, the guidelines issued by the Corporate Compliance Directorate (RCU), through the Ethics and Compliance Management Office, shall be mandatory and shall prevail over any other guidelines, except in those cases in which the RCU expressly establishes that the final determination shall be made by the individual responsible for the assessment in accordance with this Guideline.


Without prejudice to the foregoing, if there are changes to the conditions considered by the RCU at the time of issuing its guidelines, or if elements are identified that were not known to the RCU at that time, a new ethical dilemma may be submitted through the Ethics Line, in order for the matter to be reassessed in light of the new conditions.

### **3.8. Disclosure , anual update, and monitoring**

Members of the Board of Directors and members of Senior Management shall execute and update annually, as applicable, the independence statement titled "Conflict of Interest Declaration," or the format established by Ecopetrol's Corporate Compliance Directorate, for the purpose of disclosing conflict-of-interest situations that have not previously been reported in writing through the mechanisms established for such purpose, or with respect to which changes may have occurred.

However, whenever a potential conflict situation arises, the disclosure shall be made immediately, in accordance with the provisions set forth in this guideline. The annual report does not exempt individuals from the duty to disclose conflict-of-interest situations.

Adicionalmente, se deberá cumplir con los requerimientos que sobre la materia disponga la ley y la normativa interna de Ecopetrol.

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Under no circumstances shall the monitoring activities carried out by the Ethics and Compliance Management Office be construed as a form of control over the assessments performed by the respective evaluator, who is responsible for ensuring the proper analysis, determination, and management of the conflict declared by the individual involved, based on the information available

Monitoring activities also cover instances in which an employee fails to submit a report after having received a recommendation to do so in response to an ethical dilemma

### 3.9. Consequence of conflict materialization

Failure to comply with the provisions set forth in this Guideline may constitute a violation of the Codes of Ethics and Conduct and may give rise to the following consequences, subject to the prior completion of the corresponding internal procedures:


- **Educational:** Ethical talks and/or training or awareness-raising activities.
- **Labor-related:** warning letters, impacts on variable compensation, termination of the individual employment contract, among others.
- **Disciplinary:** Reprimand, fine, suspension, special disqualifications, dismissal, and general disqualification from the exercise of public functions, as applicable.
- **Precontractual:** Inadmissibility of the bid and/or the possibility of suspension or cancellation of selection methods.
- **Contractual:** Imposition of the applicable consequences for breach of the ethics, transparency, and compliance obligations clause.
- **Criminal:** Fines, prohibitions, disqualifications, arrest, and even imprisonment, as applicable.
- **Fiscal:** Fiscal liability in those cases where the materialization of the conflict results in an impact on the public treasury.
- **Administrative:** Administrative sanctions imposed by inspection, oversight, and control authorities, where applicable.

## 4. CONTINGENCIES

N/A

## 5. APPENDICES

N/A

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<p><i>This document was electronically signed, in accordance with the provisions set forth in <b>Decree 2364 of 2012</b>, which regulates Article 7 of Law 527 of 1999 regarding electronic signatures and establishes other provisions.</i></p> <p><i>To verify compliance with this mechanism, the system generates an electronic <b>report evidencing the traceability of the review and approval actions</b> carried out by the responsible parties. If verification of this information is required, please request such report from the Service Desk.</i></p>	