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	Compliance Management System Corporate Compliance Department		
	CODE GEE-P-013	Prepared: 15/12/2025	Version: 3

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1. OBJECTIVE

This document defines the principles, rights, duties, responsibilities, among other aspects related to the management of ethical and compliance matters, in which the facts and conduct of the recipients of the Code of Ethics and Conduct are verified¹. As well as the competencies the competencies and guidelines that govern the management of reports, complaints, dilemmas, inquiries, and the use of the Ethics Line.

2. GENERAL CONDICTIONS

2.1. Scope

This procedure applies to Ecopetrol S.A. ("Ecopetrol") and the companies of the Ecopetrol Group, and shall be applied based on the nature, jurisdiction, and structure of each company.

This document applies to directors (members of the Board of Directors and legal representatives) and employees at all levels of Ecopetrol S.A. (Ecopetrol) and of the controlled/subordinate companies of the Ecopetrol Group (the Group or EG), as well as to their beneficiaries².

Likewise, it applies to all natural or legal persons (identified as suppliers or contractors, subcontractors, and partners, as well as the natural or legal persons engaged by these groups under any arrangement for the execution of activities arising from their contractual relationships with the Ecopetrol Group), by virtue of the obligations set forth in contractual clauses, commitments to integrity, and other enforceable mechanisms in accordance with the nature of the relationship.

In accordance with the provisions of the Corporate Governance Model for the Ecopetrol Group (developed in Guideline GEE-G-041 or any document that repeals, replaces, or amends it), this document shall be applied by Ecopetrol S.A. and by the companies over which Ecopetrol exercises control (controlled/subordinate companies: affiliates and subsidiaries). In those companies where no situation of control or subordination exists, this document may serve as guidance, and its principles and guidelines may be implemented as a reference for good practice.

2.2. Terms and Definitions


Los términos y definiciones asociadas a la interpretación de este procedimiento se encuentran contenidas en [Glosario Corporativo de Ecopetrol S.A.](#)

2.3. General Guidelines

Ecopetrol has established an independent, efficient, and reliable channel for the submission of reports, complaints, dilemmas, and inquiries, called the Ethics Line. This channel is easily accessible to any

¹ This statement 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 that have any relationship with the company, including contractors, suppliers, agents, partners, clients, allies, as well as the personnel and companies that contractors may engage to carry out the agreed activities.

² *Beneficiaries* shall be understood as all natural persons who, in accordance with the scope defined by the internal guidelines, are authorized to access the provision of certain services offered by Ecopetrol.

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person, available 24/7, ensures confidentiality, and even allows for the receipt of anonymous reports. It is administered by an independent third party.

Depending on the nature of the matter, the Ethics Line receives:

Reports or Complaints: Description of facts and conduct presumably constituting an infraction of the Codes of Ethics and Conduct.

Dilemmas: Doubts or concerns that recipients of the Codes may have regarding situations that may impact compliance with the principles, guidelines, rules, and other provisions established in the Code. The purpose of presenting dilemmas is to receive advice and guidelines that must be followed.

Inquiries: Requirements related to the proper fulfillment of roles, functions, and responsibilities by participants or decision-makers regarding to due diligence procedures, e.g review of ethics and compliance clauses and templates of Ecopetrol and/or its counterparties, associated with the prevention of fraud, corruption, bribery, money laundering, terrorist financing, financing of the proliferation of weapons of mass destruction (ML/TF/FPWMD), FCPA violations, and restrictions on free competition, among other forms of misconduct. Through these inquiries, red flags concerning contractors, suppliers, partners, employees, or other related counterparties are identified, assessed, and managed in a timely manner and with a preventive approach. Preventive recommendations are also issued to mitigate detected red flags, manage risks, and support informed decision-making by those responsible for each process, without engaging in co-management, but rather in support of providing transversal, strategic, and timely assistance to the business.

2.4. Principles and Rights in the Submission of Dilemmas, Inquiries, Reports, or Complaints


Good Name and Honor: The right to the good name and honor of those reported is respected; the submission of reports with false, biased, or harmful information intended for revenge or retaliation is prohibited.

Good Faith: Every report or complaint must be made in good faith, without unsupported value judgments that lack factual basis, and with due respect for the fundamental rights to privacy, dignity, and good name of individuals. Reports must not be made maliciously or dishonestly, or with the intent to obtain personal benefits or cause harm to a third party.

Made a report with knowledge that the elements or information contained therein do not correspond to reality constitutes a breach of the principle of good faith, without prejudice to any applicable labor, disciplinary, criminal, or civil sanctions.

Promptness: Dilemmas, inquiries, or reports shall be managed within the shortest possible timeframe, without unjustified delays.

Confidentiality: Reports shall be managed confidentially, covering the identity of the reporter, facts, elements, and evidence collected. However, confidentiality is subject to legal exceptions or to situations that, due to the nature of the matter, require referral to a competent authority and/or to authorized

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Ecopetrol areas empowered to make decisions. Any person who becomes aware of information related to an ethical matter must ensure its confidentiality and proper protection, care, custody, and management, and may only disclose it for expressly permitted purposes.

Likewise, the individual who submits a report, dilemma, and/or inquiry must refrain from disclosing any information related thereto within their work, family, and personal environments, including, but not limited to: (i) refraining from disclosing personal information about the individuals involved; (ii) not sharing information during meetings with co-workers, family members, friends, among others; (iii) refraining from posting information related to the report, dilemma, and/or inquiry on social media; (iv) not allowing access to electronic devices where the reported information is stored; and (v) keeping the access password to the tool in a secure place.

Human Dignity: Dilemmas, inquiries, complaints, and/or reports shall be managed with due respect for and protection of the human dignity of all participants.

Impartiality/Objectivity: Individuals managing ethical matters must refrain from intentionally favoring or harming any person, maintaining objectivity.


Integrity: This is the principle that represents consistency between what we think, say, and do. A person of integrity remains firm in what is non-negotiable. They act consistently with a commitment to life, respect, responsibility, uprightness, loyalty, justice, objectivity, honesty, and transparency toward the Company and society, complying with applicable internal and external regulations, as well as with the principles and rules adopted by the organization to prevent violations of the ethical standards and expectations set forth in this Code. However, integrity has an axiological scope that goes beyond the legal premise contained in the regulations governing the different disciplines (labor, administrative, criminal, disciplinary, or tax, among others).

Privacy: In the handling of reports, the privacy of the reported individuals must be protected; therefore, it must be ensured that the reported information is not disclosed or accessed irregularly by personnel not related to the ethics and compliance function.

Non-Retaliation: Any direct or indirect action that negatively affects a good-faith complainant is prohibited when intended to deter, punish, intimidate, or harm them for having submitted, or intending to submit, a report.

Data Protection: Dilemmas, inquiries, complaints, and reports shall be managed using the technical, human, and administrative measures necessary to protect personal data, preventing its alteration, loss, consultation, processing, use, or unauthorized access.

Comprehensive Protectio for Whistleblowers: Good-faith whistleblowers who report facts or situations that may constitute violations of the Codes of Ethics and Conduct and applicable regulations shall be protected. To this end, Ecopetrol establishes protection mechanisms in the *Good-Faith Whistleblower Protection Guide*, identified by code SCU-G-001, or any document that replaces, supplements, or amends it, in order to foster an environment of trust that promotes free and safe

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reporting, particularly of conduct or acts related to corruption, bribery, fraud, money laundering, terrorist financing, financing of the proliferation of weapons of mass destruction (ML/TF/FPWMD), violations of free competition regulations, among others.

Likewise, when a situation is identified that may put at risk the integrity of the user—whether an employee, an external third party, or the user’s family members—the competent authorities shall be informed for the adoption of any actions that may be applicable.

Confidentiality: Dilemmas, inquiries, complaints, and reports may include information that is restricted from public access for the reasons established in the Constitution and the law, including, among others, the right to individuals’ privacy and intimacy, as well as the protection of data related to financial and commercial information.

Individuals defined as administrators under Law 222 of 1995 have the duty to safeguard and protect Ecopetrol’s commercial and industrial secrecy.

Adequacy: Responses to dilemmas, inquiries, complaints, and reports shall include the appropriate development, documentation, and the reasons supporting such responses.

Legality and Lawfulness: Any evidence obtained to address dilemmas, inquiries, complaints, and reports must be collected in a lawful manner, respecting the privacy and intimacy of the individuals involved.

2.5. Reliability and Security of the Ethics Line

The Ethics Line of Ecopetrol and the Ecopetrol Group is the official channel for receiving inquiries, dilemmas, and reports. It operates 24 hours a day, 7 days a week, guaranteeing the confidentiality, impartiality, and security of the information, while also allowing for anonymity.

This channel is administered by an internationally recognized independent third party that adheres to rigorous European and North American data protection standards and has proven experience and security protocols for safeguarding the information recorded through this channel.


The information contained in the Ethics Line constitutes a personal data database, duly registered and subject to periodic reporting to the Superintendence of Industry and Commerce (SIC), in compliance with personal data protection regulations, namely Law 1581 of 2012 or any regulation that replaces or amends it.

Internally, access controls are implemented, under which the permissions and access rights granted to Ethics Line users are periodically monitored, in full compliance with cybersecurity policies.

2.6. Management Elements in Reports

During the management process, the following shall be ensured:

Objective and supported verification of facts: The Ethics and Compliance Management Office (GEC) of the Corporate Compliance Directorate (RCU) of Ecopetrol, or its equivalent in the subordinate companies,

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through a qualified interdisciplinary team, conducts verifications in accordance with criteria of specialization, proportionality, timeliness, and the severity of the conduct. Accordingly, priority is given to conduct that may have a greater impact on the materialization of risks for Ecopetrol.

Independence: Verifiers shall act impartially and objectively, based on data, facts, evidence, standards of reasonableness, and rules of experience.

Consequently, all individuals involved in the handling of a report must inform their immediate superior of any situation that may give rise to a potential or actual ethical conflict and/or conflict of interest.

Follow-Up: Users of the Ethics Line must follow up on their case, even if it was submitted anonymously, by using the key issued by the system and the password created by the user. This ensures that any questions arising during the verification process are addressed in a timely manner, allowing for proper handling and closure of the case.

Response: Through the Ethics Line, a response regarding the handling of the matter must be issued, providing general information about its completion.

Document Retention: Verifications shall be duly documented, and such documentation shall be permanently retained in the repository designated for this purpose. The information entered into the system by each verifier is supported by document retention schedules, in accordance with the Document Management guidelines of the respective company and applicable legislation.


Specialization: Verifications shall be conducted in accordance with the specific conditions, context, potential conduct to be verified, and individual circumstances, allowing for the establishment of the most appropriate methodology to ensure timely and rigorous results. However, such verifications shall maintain a general framework of action that promotes transparency and prior awareness of the steps to be undertaken, the stages involved, adherence to an objective procedure, and the protection of rights and minimum guarantees.

Cooperation: Employees and contractors have the responsibility to cooperate in a timely manner in the handling of reports or complaints. Accordingly, the Corporate Compliance Directorate (RCU) may request the submission of information, which must be provided within five (5) business days. In the exceptional event that it is not possible to respond within the established timeframe, the deadline may be extended for an additional five (5) business days.

2.7. Roles and Responsibilities in the Management of Ethical and Compliance Matters

2.7.1. Ecopetrol Corporate Compliance Director:

- Issue corporate guidelines related to the compliance function within the Ecopetrol Group, which comprises the Internal Control System, Integrated Risk Management System, ethical standards,


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and the engagement with oversight and regulatory bodies, in the management of verifications and cases with impact on the Ecopetrol Group.

- Lead engagement with business areas to promote the adoption of the highest ethical standards, with the purpose of preventing violations of the Codes of Ethics and Conduct.
- Provide support in key decision-making processes within the Ecopetrol Group to identify, prevent, and control risks.
- Lead the continuous improvement of the Internal Control System and the Integrated Risk Management System, based on the conclusions derived from the verification of reports.
- Define management indicators for matters reported through Ecopetrol's ethics hotline and monitor their performance.
- Establish guidelines for the proper assurance of cases, including their prioritization, identification of synergies, patterns of conduct, and the application of the ethical clause across Ecopetrol and its subsidiaries.
- Report to the Ethics Committee and the CAUD on relevant cases and on the results of the management of ethical and compliance matters covered by this procedure.
- Serve as the Leader of the Ethics Committee
- Issue guidelines for prevention, detection, response, monitoring, and strategic support in the comprehensive management of compliance matters, in coordination with internal control, risk management, ethics, oversight and disciplinary bodies, and other relevant areas and roles within Ecopetrol and its subsidiaries.
- Generate synergies and alignment of the compliance function within the Ecopetrol Group with risk management and administrative areas, while preserving the independence and objectivity of the function under its responsibility.

2.7.2. Ethics and Compliance Manager:


- Report to the Corporate Compliance Directorate on the management of received and processed matters that are considered impact cases (reputational impact, compliance typologies, impact on consolidated financial statements), as well as those related to violations of the FCPA Law, SOX Law, corruption, bribery, fraud, money laundering, terrorist financing, financing of the proliferation of weapons of mass destruction, violations of free competition regulations, discrimination, harassment, or sexual violence, among others.
- Issue responses to dilemmas and inquiries registered through the Ethics Line that fall within the scope of the Ethics and Compliance Management.

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- Authorize extensions of deadlines for the processing of reports, dilemmas, and inquiries related to Ecopetrol and its subsidiaries.
- Designate the Ethics Line administrator for case management.
- Prepare the reports that the Corporate Compliance Directorate must submit to the Board of Directors, the CAUD, the President, the Ethics Committee, and other competent authorities upon request.
- Act as Secretary and Chief Verifier of the Ethics Committee.
- Monitor and prioritize matters registered in the Ethics Line and prioritize issues in accordance with the guidelines issued by the Corporate Compliance Directorate.
- Assign matters to internal or external verifiers based on their profile and area of expertise.
- Monitor and issue guidelines for verifications conducted within Ecopetrol and the companies that make up the Group regarding potential violations of the Codes of Ethics and Conduct. Advise Ecopetrol S.A.'s subsidiaries in the compliance investigations they conduct, including continuous improvement actions.
- Carry out referrals to the relevant internal areas and external authorities, as applicable.
- Analyze management results in order to propose continuous improvement actions.

2.7.3. Subsidiary Compliance Managers:


- Support strategic decisions of the company through risk and control analysis.
- Implement guidelines issued by Ecopetrol to promote a culture of integrity.
- Coordinate the company's areas in the identification, administration, and management of their risks.
- Report advances, statistics, and indicators on the management of ethical and compliance matters to the Corporate Compliance Directorate, and perform the corresponding follow-up.
- Present and substantiate matters and their management before Ecopetrol's Corporate Compliance Director, or the person delegated by them, when required.
- Submit the necessary and sufficient information for the management and closure of cases, when required by the Corporate Compliance Directorate, or to address requests from subsidiary areas, Ecopetrol, and/or external authorities.

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- Monitor matters registered through the Ethics Line and prioritize issues in accordance with the guidelines issued by the Corporate Compliance Directorate.
- Inform the Ethics and Compliance Manager of Ecopetrol of closure actions that involve referrals to internal areas of the subsidiary or to external authorities, for the corresponding analysis, in accordance with the guidelines issued for the management of matters reported through the Ethics Line.
- Analyze management results in order to propose continuous improvement actions and to establish the company's training and education plan on ethical and compliance matters.

2.7.4. Ethics and Compliance Verification Lead

- Coordinate ethics and compliance reviews related to corruption, fraud, bribery, money laundering, terrorist financing, financing of the proliferation of weapons of mass destruction, ethical and/or conflicts of interest, sexual harassment or violence, violations of competition regulations, matters related to the procurement of goods and services, and other ethics and compliance typologie.
- Coordinate the identification of behavioral patterns, areas, and impacted departments in order to improve the prevention, detection, and monitoring actions carried out by the Directorate.
- Consolidate and report to the Ethics and Compliance Management the progress, statistics, and indicators related to the management of ethics and compliance matters.
- Advise the Directorate on the implementation of best compliance practices, as well as on the ongoing updating of national and international regulations governing Ecopetrol S.A.
- Support the preparation of the reports that the Corporate Compliance Director must submit to the Board of Directors, the CAUD, the President, the Ethics Committee, and other authorities.
- Timely follow up on the management of reports logged through the ethics hotline and prioritize matters in accordance with the guidelines issued by the Corporate Compliance Directorate and the Ethics and Compliance Management.
- Assign matters related to compliance typologies to internal or external reviewers based on their profile and expertise.
- Issue guidelines to reviewers for the processing and definition of methodological plans for assigned matters, ensure proper classification of cases according to the different typologies, and ensure their closure.
- Carry out transfers to internal areas and external authorities, as applicable.
- Analyze management results to propose continuous improvement actions.

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- Receive, analyze, and approve/deny digital evidence requests required by ethics and compliance case reviewers.


2.7.5. Computer Forensic Analyst:

- Ensure the reliability, legality, traceability, and sufficiency of the technical deliverables provided to the verifier of the matter, dilemma, or inquiry, as well as to any authorities that may request them.
- Properly document forensic computing procedures and the processes for securing and handling digital evidence.
- Adhere to the principles of Identification, Collection, Acquisition, and Preservation of Digital Evidence (ISO 27037 Standard).
- Address ethical and compliance matter requirements that have been duly requested and justified through the tool designated for this purpose.
- Keep the inventory of cases and consultations involving collected and processed digital evidence up to date.
- Submit the required management reports regarding the matters under their responsibility.
- Ensure that technical deliverables meet the requirements of expert evidence reports as established in the General Code of Procedure, or any regulation that replaces or supplements it.


2.7.6. Ethics and Compliance Reviewers:

For the purposes of this procedure, Ethics and Compliance Verifiers (hereinafter referred to as the "verifiers") are considered to be RCU employees, the Compliance Officers of subsidiaries and their teams, and Ad Hoc Ethics and Compliance Verifiers (internal or external), provided that ethical and compliance matters are assigned to them for management. They shall have the following responsibilities:

- Act with the highest level of diligence, objectivity, independence, impartiality, responsibility, and assurance in the matters under their responsibility.
- Maintain the confidentiality of the matters assigned to them, including after the termination or completion of the assignment.
- Promote continuous learning in the topics and disciplines related to the assigned typologies.
- Conduct verifications in accordance with this procedure and the specific characteristics of each report or complaint. In all cases, the following stages must be ensured: identification of verification lines, formulation and development of the methodological plan, collection of information and data, analysis, conclusions, and closure actions (where applicable).

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- Timely report any situation that may give rise to an ethical conflict or conflict of interest, or that may potentially affect objectivity, independence, or impartiality in a verification. Such report must be submitted to the Ethics and Compliance Verification Lead so that, if applicable, a new verifier may be appointed for the specific case.
- Gather the information required for case analysis through documents, data, technological tools, among other means.
- Request forensic computing analysis (when required), identifying the elements that define and limit the scope of the search.
- Conduct interviews, when deemed pertinent for the development of the verification.
- Ensure that the closure of the matter is supported by background information, evidence, precedents, documents, and other means that allow for solid, sufficient, and credible conclusions.
- Prepare closure reports containing the corresponding decision, including a description of the activities performed, findings, and recommendations, where applicable.
- Maintain evidence and supporting documentation for the verifications, conclusions, and statements made in the reports, and ensure that they are timely recorded in the Ethics Line, as the sole official repository for reports, dilemmas, and inquiries.
- Resolve reports within the timeframes established in this document, with the possibility of requesting extensions when necessary.
- Assess the impact of the analyzed facts in relation to process risks and controls and, if applicable, refer the matter to the relevant area for analysis and action.
- Evaluate the referral of the matter to internal or external areas, subject to prior validation of the appropriate reporting or supervisory level.
- Conduct ethics awareness sessions established as part of the closure of each case and record such activity in the Ethics Line.
- Follow up on the decisions adopted by the competent areas and report the supporting documentation and closure of management actions in the Ethics Line. All information related to the management of the matter must be recorded in the Ethics Line, the official institutional information repository.
- Submit management reports as requested regarding the matters under their responsibility.

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- Provide the necessary information to respond to requests from internal areas or external authorities regarding the matters under their responsibility.
- Properly support and present the cases under their responsibility before the instances in which they are required.
- Update the cases under their responsibility, including after closure, with any information received related to each matter.
- Develop verification and case assurance activities with a synergy-oriented approach toward other RCU work groups and with a focus on preventive assurance of process risks together with the areas impacted by the cases under their responsibility.
- Sufficiently document the review of all data required to resolve any doubts, concerns, or aspects related to dilemmas, inquiries, and reports.

2.7.7. Ethics Line Administrator (Case Manager):

- Conduct, together with the Ethics and Compliance Verification Lead and/or the Ethics and Compliance Manager, as applicable, the analysis to assign and classify matters for allocation based on the verifier's competencies and/or to the corresponding subsidiary, in accordance with the criteria established in this procedure.
- Validate the sufficiency and quality of the initial data registered in the Ethics Line prior to assignment, and complete any missing or required information, as applicable.
- Refer matters outside competence to corresponding areas and communicate to the user.
- Process and close all matters classified as "Informational," meaning matters that do not fall within the scope of the ethics and compliance function and do not require management by the Company.
- Manage the monitoring and timely completion of matters assigned to verifiers and to the Compliance Officers of Subsidiaries, in order to generate alerts regarding approaching deadlines and ensure proper closure in the system.
- Respond to requests for ethical background information of employees submitted by the Ethics and Compliance Management and/or verifiers, or by the Compliance Officers of Subsidiaries, upon written and duly justified request.
- Close cases in the system, subject to the prior approval or authorization, as applicable, of the Ethics and Compliance Verification Lead, the Ethics and Compliance Manager, or their equivalent in the respective subsidiary, recording evidence of such approval or authorization for each matter.
- Close consultations and dilemmas for which the corresponding response has already been issued.


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- Verify that all matters closed in the system include the corresponding report or closure record, and that evidence of management actions and follow-up related to closure is duly documented.
- Support the compilation of statistics related to matters reported through the Ethics Line, enabling the identification of areas, reporting parties, reported parties, typologies, years, stakeholders, topics, and other relevant characteristics.
- Quarterly consolidate a report of all active closure actions for follow-up by the verifiers.
- Carry out the activities defined in Section 3.1.2, "Authority for the Processing of Matters," of this procedure, in the management of reports or complaints that fall under the scope of the Ad Hoc Ethics and Compliance Verifier.

2.8. Matters Outside the Scope of this Procedure


As these are matters that correspond to other company areas or external entities, referral shall be made according to the topic.

TOPIC	FACTS	TRANSFERS
Contractual	<ul style="list-style-type: none"> • Observations or claims submitted during the processing of a contractual procedure that must be reviewed by the authorized official and/or the evaluation committee during the contractor selection stages, provided that they do not arise from potential breaches of functional duties or principles attributable to the contractual counterparts. • Complaints submitted by contractors/suppliers against other contractors/suppliers, regarding events that occurred at facilities other than those of Ecopetrol or its subsidiaries, or unrelated to the performance of their contracts with Ecopetrol or its subsidiaries, provided that they do not arise from potential breaches of functional duties or principles attributable to the contractual counterparts. • Petitions (right of petition) within the framework of contractual management. • Delays in the payment of obligations by suppliers and contractors, or non-compliance with civil obligations that are not the responsibility of Ecopetrol or the corresponding Group company, 	Administrative and Services Vice Presidency, or the area performing its functions.

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	provided that such facts do not arise from potential breaches of functional duties or principles attributable to the contractual counterparts.	
TOPIC	FACTS	TRANSFERS
Employment	<ul style="list-style-type: none"> Issues related to the non-payment or late payment of salaries, employee benefits, per diem allowances, travel expenses, and other emoluments arising from the employment relationship with Ecopetrol or a subsidiary company. Requests for reinstatement. Employee performance evaluations, except in cases involving procedural errors. Workplace harassment.³ 	<p>Corporate Vice Presidency of Organizational Talent or the area performing its functions.</p> <p>Labor Coexistence Committee (Workplace Harassment)</p>
health	<ul style="list-style-type: none"> User dissatisfaction with the provision of health services. Issues related to evaluations of medical leave or occupational medical restrictions. User requests or complaints regarding medications, treatments, medical orders, medical opinions or assessments, and the facilities where medical services are provided. 	Corporate Vice Presidency of Territorial Transformation and HSE, or the area performing its functions.
Communities	<ul style="list-style-type: none"> Requests regarding social investment in the regions. Dissatisfaction related to personnel hiring due to lack of priority given to the local community. Complaints regarding discharges or environmental pollution. Damages caused by hydrocarbon spills. 	Corporate Vice Presidency of Territorial Transformation and HSE, or its equivalent area.
Others*	<ul style="list-style-type: none"> Domestic violence. Failure to provide child support. 	Autoridad competente (ej. fiscalía general de la Nación, Comisarías de Familia, ICBF,
TOPIC	FACTS	TRANSFERS

³ Law 1010 of 2006 defines it as any persistent and demonstrable conduct exercised against an employee or worker by an employer, an immediate or higher-level supervisor, a coworker, or a subordinate, aimed at instilling fear, intimidation, terror, and distress; causing harm to employment conditions; generating demotivation at work; or inducing the employee's resignation.

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	<ul style="list-style-type: none"> • Matters involving the protection of minors or those under the jurisdiction of the Colombian Family Welfare Institute (ICBF) or family courts. • Extramarital relationships or infidelities that do not constitute a violation of Ecopetrol’s Code of Ethics and Conduct. • Failure by employees to comply with civil obligations related to matters unrelated to the company and that do not affect the work environment, without prejudice to those cases that must be referred to the Disciplinary Investigation Management, in accordance with Law 1952 of 2019 or any regulation that amends or repeals it. • Alleged misuse of social networks or digital media for personal use. 	<p>Conciliation centers, the judicial branch, etc.)</p> <p>* Due to the nature of these matters, it is the responsibility of each interested person to report them directly to the competent authorities.</p>
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3. DEVELOPMENT

3.1. Reports or Complaints

3.1.1. Protection and Respect for Fundamental Rights


The protection and guarantee of the fundamental rights of all parties involved in a verification process constitute the starting point of any action and serve as the backbone upon which the stages and procedural actions carried out are upheld.

Under this understanding, the verification shall be conducted within the limits established in this procedure, with full observance and guarantee of the principles defined in Section 2.4 and of the fundamental rights of the parties involved, especially those subject to the verification.

Ethical or compliance verification is an internal investigative process, independent and autonomous in nature, aimed at confirming or disproving the facts and/or conduct that have been reported or reported as an alleged violation of the Code of Ethics and Conduct of the Ecopetrol Group, as well as the Code of Ethics and Conduct for Suppliers and Contractors. Ethical or compliance verifications shall under no circumstances have a sanctioning scope in and of themselves.

The activities and actions carried out within the framework of a verification process must, in addition to complying with the provisions set forth in this document, ensure the protection of the following rights:

- **Dignity:** This is the source of all rights and consists of a profound expression of respect for human beings, as well as the recognition and inherent value of each individual.

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- **Equality:** All persons involved in a verification process must be treated equally whenever circumstances are the same. Any differences in treatment must be based on well-founded and reasonable justification. Equal factual situations must be subject to equal consequences.
- **Privacy:** This refers to the right to enjoy a private and reserved sphere in which to develop a full and free personal and family life, free from the knowledge or interference of third parties, provided that such freedom and fulfillment do not interfere with the rights of others or entail a violation of ethical or legal frameworks.

Additionally, segregation of duties within the process is ensured, whereby the verification process and the decision-making process are carried out by different employees.


As a result of the verifications, the verifiers, as well as other areas of the RCU when applicable, issue recommendations addressed to the competent areas of the company, which may decide whether to adopt them or not. The competent areas shall carry out the corresponding internal procedure in cases where the imposition of sanctions is required.

In cases where the competent area determines a sanctioning measure, it must ensure due process, guaranteeing at least the following minimum requirements: (i) application of the procedure previously established in the applicable regulations; (ii) impartiality; and (iii) respect for the fundamental rights of the affected party.

3.1.2. Receipt and Registration of the Report or Complaint

Reports shall be filed through the Ethics Line, and the following stages shall be followed, as applicable:

- a. Complainants may submit their reports or complaints through the channels made available by Ecopetrol:
 - A toll-free and confidential telephone line, available nationally and internationally.
 - The Ethics Line portal, available on Ecopetrol's corporate website.
- b. Complainants may submit their reports or complaints anonymously and confidentially; however, they may also choose to identify themselves in the Ethics Line tool if they wish to be contacted subsequently by the verification team.
- c. When the Complainants submits the report or complaint through the website, they shall record the information requested by the Ethics Line tool and may attach any evidence or supporting documentation in their possession. When the report is made via the telephone line, the Ethics Line operator shall receive the information from the whistleblower and upload it into the Ethics Line tool. In both cases, the whistleblower shall be requested to provide a detailed account of the facts and identify the persons allegedly involved in the conduct (if such information is known).


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- d. Regardless of the channel used to submit the report or complaint, the whistleblower may track the status of the report—even if it was submitted anonymously—by using the access code provided by the tool or by the Ethics Line operator. This mechanism ensures bidirectional communication between the whistleblower and the team responsible for managing the report or complaint, allowing the whistleblower to provide additional information, attach new evidence, and learn about the status of the report.
- e. If the report or complaint is brought to the attention of ethical mentors or internal area leaders at Ecopetrol, they shall guide the whistleblower to submit the report through the channels enabled for the Ecopetrol Ethics Line. However, when the facts are made known to the Corporate Compliance Director or any employee of the RCU, they must forward the information to the Case Manager, who shall proceed with registering the report in the Ethics Line tool. In such cases, the Case Manager shall avoid registering the person who reports the facts (for example, the ethical mentor or RCU employee) as the main whistleblower and shall register the report as anonymous, unless the reporting person states that they have direct knowledge of the reported facts.
- f. The Case Manager may also register reports ex officio, upon instruction from the compliance officers of subsidiaries, the Ethics and Compliance Manager, or the Corporate Compliance Director. Such reports may arise from the monitoring of reputational news in national and international media, among other sources.

3.1.3. Assignment of the Report or Complaint


Based on the facts or persons reported, the Case Manager shall refer the matter to the competent internal areas in accordance with the instructions described in the following table. When the matter is not required to be managed through the Ethics Line, it shall be referred to the corresponding internal areas as defined in Section 2.8 of this procedure.

COMPETENT AUTHORITY	JURISDICTION
Audit and Risk Committee of the Ecopetrol Board of Directors (CAUD)	In accordance with the provisions set forth in the Internal Regulations of the Audit and Risk Committee of the Ecopetrol Board of Directors (Article 10, Sections 31 and 32), the reports
COMPETENT AUTHORITY	JURISDICTION
	that involve the Chair of the CAUD shall be managed by the other members of the CAUD, who may rely on the support of the RCU team, in all cases excluding the Chair of said Committee.


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<p>Chair of the Audit and Risk Committee of the Ecopetrol Board of Directors</p> <p>The CAUD shall assign matters within its jurisdiction⁴ to its Chair, who shall manage them directly or rely on the support of the RCU team or on an Ad Hoc Ethics and Compliance Verifier appointed for the matter.</p>	<p>Reports or complaints that:</p> <ul style="list-style-type: none"> • Involve members of the Ecopetrol Board of Directors. • Involve the President of Ecopetrol, senior management employees as defined by the Corporate Vice Presidency of Organizational Talent as follows: <i>"Positions included within Senior Management (which correspond to those positions that, according to the Company's [Ecopetrol's] organizational structure, are classified as 'first-level' and 'second-level' positions and therefore report directly to the President and/or to the Executive Vice Presidency of Hydrocarbons or the Executive Vice Presidency of Energy Transition, as well as Managers who exercise disciplinary authority by express legal provision) shall be understood to fall within this level, as guiding criteria in accordance with the levels regulated by law for public employment."</i> This includes reports related to alleged acts of corruption, fraud, bribery, money laundering, terrorist financing, financing of the proliferation of weapons of mass destruction, violations of the FCPA, SOX, and restrictions on free economic competition. • May generate a material impact on the Internal Control System or the Integrated Risk Management System, or that imply a high reputational, economic, financial, or operational risk for Ecopetrol. • Impact Ecopetrol's financial statements, reputation, or those of its subsidiaries. • Involve the Corporate Compliance Director, their Managers, RCU employees, or the Corporate Director of Internal Audit.
COMPETENT AUTHORITY	JURISDICTION
	<ul style="list-style-type: none"> • Involve former employees of the RCU or former Corporate Directors of Internal Audit. • The Chair of the Ecopetrol CAUD may assign the matters under his or her responsibility to the Corporate Compliance Director of Ecopetrol, with the exception of the following cases: • When the report involves the Corporate Compliance Director of Ecopetrol, Managers, or RCU employees; in

⁴ Internal Regulations of the Audit and Risk Committee of Ecopetrol's Board of Directors, Article 10, Sections 31 and 32

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	<p>such cases, the Chair of the CAUD may appoint an Ad Hoc Ethics and Compliance Verifier.</p> <ul style="list-style-type: none"> • In the event that the report involves former RCU employees, the Chair of the CAUD may appoint an Ad Hoc Ethics and Compliance Verifier.
Audit and Risk Committees of the Boards of Directors of Ecopetrol Group Companies	<p>In accordance with the provisions set forth in the Internal Regulations of the Audit and Risk Committee of the Board of Directors, or its equivalent body in each subsidiary, reports or complaints that:</p> <ul style="list-style-type: none"> • Involve members of the Board of Directors of the respective company. • Involve the President, senior management employees, or their equivalents in the respective subsidiary, related to alleged acts of corruption, fraud, bribery, money laundering, terrorist financing, financing of the proliferation of weapons of mass destruction, violations of the FCPA, SOX, and free economic competition regulations. • May generate a material impact on the Internal Control System or the Integrated Risk Management System, or that imply a high reputational, economic, financial, or operational risk for the respective subsidiary company. <p>Impact the financial statements of the subsidiary company.</p>
COMPETENT AUTHORITY	JURISDICTION
	<p>Involve employees or former employees of the subsidiary's compliance area. The Committee may assign these matters to the Corporate Compliance Director of Ecopetrol.</p>
Corporate Compliance Director – Compliance Officer.	<p>Reports or complaints that:</p> <ul style="list-style-type: none"> • Are assigned by the Chair of the CAUD or by the body performing equivalent functions in the subsidiary. <p>Originate from Ecopetrol or a subsidiary and are not within the jurisdiction of the CAUD or the body performing equivalent functions in the subsidiary, based on their complexity or potential impact on the effectiveness of the Compliance Program, enterprise risk, or the Internal</p>

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	Control System and the Integrated Risk Management System.
Ecopetrol Ethics and Compliance Management	<ul style="list-style-type: none"> • Reports or complaints from Ecopetrol that are assigned by the Chair of the CAUD or by the Corporate Compliance Director of Ecopetrol. • Reports or complaints from Ecopetrol filed through the Ethics Line that do not have a specifically assigned jurisdiction. • Reports or complaints from subsidiaries that, due to their complexity or potential impact on the effectiveness of the Compliance Program, are assigned by instruction of the Corporate Compliance Director of Ecopetrol, the CAUD, or the body performing equivalent functions in the subsidiary.
Compliance Managers of the Subsidiary Companies, or their equivalents	Reports or complaints from the subsidiary that do not have a specifically designated competent authority or jurisdiction within Ecopetrol.
Ad Hoc Ethics and Compliance Verifier A natural or legal person appointed by the Chair of the CAUD to manage the report or complaint.	Process reports or complaints that involve persons or situations that generate conflicts of interest or ethical conflicts ⁵ with respect to the Ecopetrol Compliance Officer. In such cases, the Ecopetrol Compliance Officer shall inform the CAUD, and in the event that there is.
COMPETENT AUTHORITY	JURISDICTION
To be appointed, the individual must demonstrate the training and experience established in Annex No. 1: Profile of the Ad Hoc Ethics and Compliance Verifier. The appointment shall be made by the Chair of the CAUD by email and shall be reported to the CAUD at a subsequent session.	In the event of a conflict, said Committee shall determine the measures required for its effective management. Process the reports or complaints assigned directly by the Chair of the CAUD.

The flow that must be followed for the assignment of reports according to competencies is as follows:

a. Assignments to the CAUD

The Case Manager will notify the receipt of complaints through an email addressed to the Corporate Director of Compliance of Ecopetrol. The latter will be responsible for presenting or forwarding this information to the CAUD or to the President of the CAUD. If CAUD members require access to the Ethics

⁵ Guidelines for the Management and Prevention of Conflicts of Interest and Ethical Conflicts

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Line tool to review cases within their competence, they must request such access by email from the Case Manager.

The CAUD or the President of the CAUD may designate the management of complaints to the Corporate Director of Compliance of Ecopetrol, which must be duly documented through an email. The Corporate Director of Compliance of Ecopetrol may rely on RCU employees to support the verification process. The CAUD or the President of the CAUD may assign the management of complaints to an Ad Hoc Ethics and Compliance Verifier when the reports or complaints involve: (i) the Corporate Director of Compliance of Ecopetrol, RCU managers or RCU personnel, or (ii) former RCU employees.


For reports or complaints involving the Corporate Director of Compliance of Ecopetrol, current or former RCU employees, the Case Manager will ensure that the email includes only the notification of the complaint and the case typology, without allowing identification of the individuals involved or the reported facts. Additionally, the email must include the list of potential candidates to be appointed as Ad Hoc Ethics and Compliance Verifier, according to the typologies previously communicated by the Case Manager. In order to preserve confidentiality, the Corporate Director of Compliance of Ecopetrol will not have access to these complaints through the Ethics Line tool.

The following may be appointed as an Ad Hoc Ethics and Compliance Verifier:

- i. Employees of the Corporate Legal Vice Presidency and General Secretariat, the Corporate Vice Presidency of Finance and Sustainable Value, and the Corporate Vice Presidency of Science, Technology and Innovation, provided that they meet the requirements of this role. The list of employees who meet these requirements shall be updated and administered by Ecopetrol's Corporate Vice Presidency of Organizational Talent, which shall formalize this role through a memorandum addressed to each authorized Ad Hoc Ethics and Compliance Verifier and to the Vice President of the corresponding area. The list of employees who meet the profile of Ad Hoc Ethics and Compliance Verifier shall be available for consultation by Ecopetrol's CAUD, the Corporate Director of Compliance, and the Vice Presidents of the aforementioned areas or departments.


In these cases, the President of the CAUD shall seek to appoint the employee from the Vice Presidency most appropriate to the case typology, through an email addressed to Ecopetrol's Corporate Vice Presidency of Organizational Talent, which shall formalize the appointment through a memorandum addressed to the designated employee and to the Vice President of the area or department to which the employee belongs. If the designated Ad Hoc Ethics and Compliance Verifier is a Vice President from any of the aforementioned areas, such Vice President may delegate the role to a member of his or her team who has the necessary capabilities to conduct the verification, provided that such person is included in the list of employees who meet the profile of Ad Hoc Ethics and Compliance Verifier.

The Vice Presidents shall inform the Case Manager of the name of the employee designated by the President of the CAUD or by the Vice Presidents of the areas or departments authorized to act as Ad Hoc Ethics and Compliance Verifier, together with the request to enable access to the complaints for such employee through the Ethics Line tool.

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The President of the CAUD may consider the reported facts and the typologies of the reports or complaints in order to appoint the Ad Hoc Ethics and Compliance Verifier, without the following proposed assignment being deemed exhaustive:

Typologies	Possible Designation of the Verification Leadership	Possible Designation of Verification Support
Fraud	Corporate Vice Presidency of Finance and Sustainable Value	Support in Computer or Digital Forensic Procedures – Corporate Vice Presidency of Science, Technology and Innovation
Typologies	Possible Designation of the Verification Leadership	Possible Designation of Verification Support
		Support in Procedures Requiring Legal Analysis – Corporate Legal Vice Presidency and General Secretariat
<ul style="list-style-type: none"> - Corruption - Bribery - Transnational Bribery - ML/TF/FPADM 	Corporate Vice Presidency of Finance and Sustainable Value Corporate Legal Vice Presidency and General Secretariat	Support in Computer or Digital Forensic Procedures – Corporate Vice Presidency of Science, Technology and Innovation
<ul style="list-style-type: none"> - Anti-competitive Practices - Conflicts of Interest - Sexual Harassment - Failure to Comply with Civil Obligations 	Corporate Legal Vice Presidency and General Secretariat	Support in Computer or Digital Forensic Procedures – Corporate Vice Presidency of Science, Technology and Innovation Support in Procedures Requiring Economic or Financial Analysis – Corporate Vice Presidency of Finance and Sustainable Value

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<ul style="list-style-type: none"> - Non-compliance with Rules and Procedures - Disrespect, Mistreatment, and Hostile Work Environment - Discrimination - Intimidation, Retaliation, or Revenge - Other Inappropriate Conduct 	<p>Corporate Legal Vice Presidency and General Secretariat</p> <p>Corporate Vice Presidency of Science, Technology and Innovation</p> <p>Corporate Vice Presidency of Finance and Sustainable Value</p>	<p>As required: Support in Computer or Digital Forensic Procedures – Corporate Vice Presidency of Science, Technology and Innovation</p> <p>Support in Procedures Requiring Economic or Financial Analysis – Corporate Vice Presidency of Finance and Sustainable Value</p> <p>Support in Procedures Requiring Legal Analysis – Corporate Legal Vice Presidency and General Secretariat</p>
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In any event, employees of the Corporate Legal Vice Presidency and General Secretariat, the Corporate Vice Presidency of Finance and Sustainable Value, and the Corporate Vice Presidency of Science, Technology and Innovation who are appointed as Ad Hoc Ethics and Compliance Verifiers may rely on employees from the other two Vice Presidencies to carry out the verification activities (for example, if the Ad Hoc Ethics and Compliance Verifier is an employee of the Corporate Legal Vice Presidency and General Secretariat, he or she may rely on an employee of the Corporate Vice Presidency of Science, Technology and Innovation to conduct digital forensic analyses, if required), ensuring the confidentiality of the information. In such cases, support from employees of Ecopetrol’s RCU shall not be used.

- ii. Compliance Managers of the Subsidiary Companies. In these cases, the Case Manager shall grant access to the complaint to the assigned Compliance Manager through the Ethics Line tool, so that he or she may initiate the verification process. The Compliance Manager may rely on external expert professionals or on members of his or her team to carry out this task; however, under no circumstances may such support be provided by employees of Ecopetrol’s RCU. The designation and support instructions shall be documented via email and archived by the Case Manager within the Ethics Line tool.

When the Ad Hoc Ethics and Compliance Verifier is an employee of any of the areas or departments referred to in items “i” and “ii,” such individuals shall manage the reports or complaints assigned to them in accordance with the methodology defined in section 3.1.4 of this procedure and shall assess the closing actions or the referral of the matter to internal or external areas, in line with the instructions set forth in section 3.1.5.2 of the same procedure, subject to prior validation of the results with the President of the CAUD.

Additionally, in these cases, the Ad Hoc Ethics and Compliance Verifier may rely on an expert contractor to conduct the digital forensic analysis, and the Corporate Vice Presidency of Finance and Sustainable

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Value shall be the area responsible for managing the budget balancing with the area to which the Ad Hoc Ethics and Compliance Verifier belongs.

- iii. The President of the CAUD may notify the need for a complaint to be managed (verified) by expert contractors. In such cases, the President of the CAUD shall communicate this decision to the Corporate Legal Vice Presidency and General Secretariat, the Corporate Vice Presidency of Finance and Sustainable Value, or the Corporate Vice Presidency of Science, Technology and Innovation. Whichever Vice Presidency is notified by the President of the CAUD shall act as the requesting authority for the commercial procurement mechanism for the engagement of the expert contractors.

The administration of the contracts shall be the responsibility of the Administrative and Services Vice Presidency, in accordance with the supply model. The expert contractors shall be engaged by any of the Vice Presidencies mentioned in the preceding paragraph through service orders.

Adicionalmente, las vicepresidencias deberán notificar al contratista experto la designación de la verificación de la denuncia y solicitarle al Gestor de Casos la habilitación de las denuncias a través de la herramienta de la Línea Ética a los miembros del equipo del contratista experto.


The Case Manager shall maintain contact with the contractor solely for the following purposes:

- The activation and/or deactivation of each contractor's user accounts within the Ethics Line tool.
- The assignment and communication of complaints.
- The notification of the expiration of the deadlines previously established for the management of the complaint, in accordance with the timelines set forth in section 3.3 of this procedure.
- The receipt of requests for extensions for the management of the complaint.
- Addressing inquiries raised by the contractor regarding the uploading of working papers, reports, and other supporting documentation required for approval of the closure of the verification within the Ethics Line tool.

In these cases, the independence of the Case Manager shall be ensured with respect to matters that fall within the scope of responsibility of the Ad Hoc Ethics and Compliance Verifier. Each contractor shall have full autonomy to define and develop the methodological plan for the verification and to manage the information required with Ecopetrol's internal areas, including the management of reporting forums and the communication of results before the corresponding governing bodies.

b. Assignments to the Subsidiaries CAUD

The Case Manager shall notify the receipt of complaints that fall within the scope of responsibility of the Audit and Risk Committee of the Boards of Directors of the subsidiary companies through an email initially addressed to the Compliance Manager of each Subsidiary Company. The Compliance Manager shall be responsible for presenting or forwarding said information to the aforementioned Committee. The designation instructions defined by the Committee shall be documented via email or any other written means and shall be archived by the Compliance Manager or the Case Manager within the Ethics Line tool.

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In cases where complaints involve the Compliance Manager or employees of the Compliance Management function of the subsidiary companies, the Case Manager shall ensure that the email only notifies the receipt of the complaint and does not, under any circumstances, identify the individuals involved or the reported facts. In order to preserve confidentiality, the Compliance Manager shall not have access to such complaints through the Ethics Line tool.

The reports or complaints falling within the scope of this body may be handled in accordance with the methodology defined in section 3.1.4 of this procedure.

c. Assignments to the Corporate Director of Compliance of Ecopetrol

The Case Manager shall notify the Corporate Director of Compliance, via email, of the receipt of complaints that fall within his or her scope of responsibility and, if required by this authority, shall grant access to the complaint through the Ethics Line tool. The Corporate Director of Compliance may instruct the Case Manager to assign a verifier, who shall be responsible for conducting the verification. Such verifications may be carried out by employees of the RCU, as well as by the Ethics and Compliance Manager or the Ethics and Compliance Verification Leader of Ecopetrol.

Access to these complaints within the Ethics Line tool shall be limited exclusively to the employees designated by the Corporate Director of Compliance. Should the Ethics and Compliance Manager or the Ethics and Compliance Verification Leader of Ecopetrol require support from RCU employees, they must obtain prior authorization from the Corporate Director of Compliance for the inclusion of the employees who would provide such support.


The reports or complaints falling within the scope of this authority may be handled in accordance with the methodology defined in section 3.1.4 of this procedure, and any referral of the matter to internal or external areas shall be carried out subject to prior validation by the Corporate Director of Compliance.

d. Assignments to the Ethics and Compliance Manager of Ecopetrol

For cases that fall within the scope of responsibility of Ecopetrol's Ethics and Compliance Management, the Case Manager shall prepare a proposed allocation of the complaints received during the previous seven (7) days through the Ethics Line tool. This proposal shall be reviewed jointly by the Ethics and Compliance Manager and the Ethics and Compliance Verification Leader, who shall assess the attributes of impact, credibility (plausibility assessment), and urgency of each complaint, and shall instruct the Case Manager to open either an informational file or a complaint file, as applicable.

The Ethics and Compliance Manager and the Ethics and Compliance Verification Leader shall instruct the Case Manager in the assignment of the verifier, who shall be responsible for carrying out: (i) the prior validation of cases registered as informational files⁶, or (ii) the verification of files registered as complaint

⁶ Information repository enabled within the tools provided by the Ethics and Compliance Management for the preservation of evidence, working papers, reports, and other documentation that support the complete traceability of the complaint, from its receipt through the actions carried out by the ethics and compliance verification professional to address the reported facts (resolution).

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files. In either case, the verifier shall apply the methodologies documented in section 3.1.4 of this document and in the guidelines set forth in Annex No. 2 – Guide for the Management of Ethics or Compliance Verifications under the responsibility of Ecopetrol S.A.’s Ethics and Compliance Management. The assignment of the verifier shall be made in accordance with the characteristics of the matter, the experience, and the profile of the members of the work teams, including their academic background and professional experience related to the subject matters of the cases previously assigned.


e. Assignments to the Compliance Manager of the Subsidiary Companies

Cases that fall within the scope of responsibility of the Compliance Management of the subsidiary companies (subsidiary compliance officers) shall be referred by the Case Manager to the individuals holding such positions, under the registration of a complaint file in the Ethics Line tool, and may be managed by these bodies in accordance with the methodology defined in section 3.1.4 of this procedure.

3.1.4. Methodology for the Verification Process of Reports or Complaints

For this purpose, the following stages shall be carried out: (i) identification of the lines of verification based on the reported facts; (ii) definition of a methodological plan to confirm or refute the reported facts; (iii) execution of the methodological plan and safeguarding of the evidence supporting the lines of verification; (iv) documentation and issuance of a report; and (v) formulation of conclusions and the corresponding closing actions, as applicable.


- I. The lines of verification shall document the fact (factual aspect); the identification of the alleged parties involved in the events; the conduct carried out; and descriptive, legal, regulatory, and extra-legal elements (where applicable).
- II. The methodological plan shall address the following questions: what will be done (activities or procedures)? What type of information will be required (internal or external)? Who will be responsible? When will it be completed? How will the results be monitored and evaluated? How will it be updated, as applicable? How will the results be communicated?
- III. The execution of the methodological plan may include the performance of activities or procedures as required based on the facts subject to verification, such as conducting interviews; reviewing internal process documentation; reviewing profiles published in the corporate tool; conducting computer forensic analyses on corporate equipment or electronic mailboxes; and analyzing records in accounting systems or corporate tools containing non-accounting information (including supplier, customer, and employee data, monitoring records, among others), without this implying the incurrence of evidentiary fees. The following are some general guidelines for the execution of the activities under the methodological plan:
 - a. Submit at least two requests for the supplementation or expansion of information to the complainant through the tool and/or through the means identified by the complainant (where applicable).

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- b. Conducting interviews – where applicable: Interviews shall be conducted when deemed appropriate or necessary and shall be carried out with the relevant participants or required experts. For the conduct of interviews, the verifier may consider the guidelines set forth in **Annex No. 3 – Interview Guidelines for Ethics and Compliance Verifications.**
 - c. Approval and review by the Corporate Director of Internal Audit shall be obtained with respect to the permissions that may be enabled for verifiers to access Ecopetrol’s information tools and databases.
 - d. Adoption of preservation measures – where applicable: Such measures shall be implemented when it is necessary to establish custody of relevant information, capture company information stored in the various corporate physical or electronic media, secure the corresponding images, copy information recorded in technological tools or accounting records, among others, in accordance with the applicable current regulations, the corporate technological tools made available for this purpose, and taking into account the management of the applicable risks associated with the measure adopted.
 - e. Adoption of preventive measures – where applicable: Requesting the competent area to remove or transfer the reported or accused individual from their position or area; suspending an internal process; appointing new points of contact; issuing an alert to an internal area, among others, always taking into account the risks associated with the processes and the business risks that may arise from the adoption of such measures.
- IV. The report shall clearly describe how the methodology was carried out and should be drafted in a neutral and balanced tone.
- V. The conclusion shall include the results of the verification and shall determine whether the concern or complaint is substantiated, unsubstantiated, or inconclusive. Accordingly, the conclusions of the report shall be based solely on observations derived from factual evidence; therefore, any speculation, personal opinion, or undue emphasis shall be avoided. If, as a result of the verification, it is necessary to propose closing actions, the actions documented in section 3.1.5 of this procedure shall be considered, as applicable.

During the verification process, prior to closure, alerts may be issued and communicated to the responsible areas when facts are identified that may give rise to potential disciplinary, criminal, or fiscal violations, or to breaches of the Codes of Ethics and Conduct and/or the Internal Work Regulations, in order for the corresponding actions to be taken, if applicable. It is important that each verifier submit such alerts for review and approval by the appropriate levels or authorities before they are communicated to internal areas or external authorities.

The reports resulting from the verifications shall be subject to the following levels of reporting, supervision, and approval by:

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Competent Authority for the Report or Complaint	Authority Designated for the Verification and Issuance of the Report of Results of the Report or Complaint	Potentially for the Supervision and Approval of Results (Report and Closing Actions)
Audit and Risk Committee of Ecopetrol's Board of Directors (CAUD) Presidente Comité de Auditoría y Riesgos de la Junta Directiva de Ecopetrol	Ad Hoc Ethics and Compliance Verifier	Audit and Risk Committee of Ecopetrol's Board of Directors (CAUD) or the President of the CAUD (as applicable).
Audit and Risk Committees of the Boards of Directors of Ecopetrol Group Companies	Corporate Director of Compliance of Ecopetrol Compliance Managers or Employees of the Subsidiary Companies	Audit and Risk Committees of the Boards of Directors of Ecopetrol Group Companies
Corporate Director of Compliance of Ecopetrol	Ecopetrol's Ethics and Compliance Management Ethics and Compliance Verification Leader RCU Employees	Corporate Director of Compliance of Ecopetrol
Ecopetrol's Ethics and Compliance Management	RCU Employees	Ethics and Compliance Verification Leader (*) Details of the reporting level are documented in Annex No. 2 Guide for the Management of Ethics or Compliance Verifications under the responsibility of the Ethics and Compliance Management.
Competent Authority for the Report or Complaint	Authority Designated for the Verification and Issuance of the Report on the Results of the Report or Complaint	Potentially for the Supervision and Approval of Results (Report and Closing Actions)

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Compliance Managers of the Subsidiary Companies or Whoever Acts in Their Place	Employees or Compliance Managers of the Subsidiary Companies	Ecopetrol Ethics and Compliance Management

Each authority shall approve the issuance of the final version of the report and shall issue the instructions to proceed with the closing actions (if applicable), or, failing that, shall propose new activities to be incorporated into the methodological plan and addressed by the verifiers.

The verifiers shall monitor the follow-up on the closing actions recommended to the competent areas and shall provide the support required by such areas, provided that this is feasible within the scope of their responsibilities.

The verifiers shall ensure that the reporting party or complainant is notified of the conclusion of the verification process through the Ethics Line, in a general manner, taking into account the confidentiality of the verification process and the closure of the case within the tool, following the prior uploading of the closing report, the supporting evidence, referral memoranda (where applicable), official communications (where applicable), evidence of the delivery of an ethics awareness session (where applicable), among other documents.


3.1.5. Applicable Actions

3.1.5.1. Special Considerations Related to Alleged Situations of Harassment or Sexual Violence

The verifiers may implement the closing actions established in **Annex No. 2 – Guide for the Management of Ethics or Compliance Verifications under the responsibility of the Ethics and Compliance Management of Ecopetrol S.A.**

3.1.5.2. Closing Actions Handled by the Compliance Management of the Subordinate Companies or by the Ad Hoc Ethics and Compliance Verifier

- **Preventive awareness**, sessions may be conducted by the Ad Hoc Ethics and Compliance Verifier, and, in cases that fall within the scope of responsibility of the Compliance Management of the subsidiary companies, they may be carried out by the verifiers assigned by such management units. These sessions shall be aimed at strengthening and providing personal training to reaffirm commitment to ethical guidelines, or conducted at a group level to disseminate knowledge of ethical guidelines and/or competency-related standards, with written evidence duly recorded.

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- **Ethics awareness** sessions may be conducted by the Ad Hoc Ethics and Compliance Verifier, and, in cases that fall within the scope of responsibility of the Compliance Management of the subsidiary companies, they may be carried out by the verifiers assigned by such management units, for the purpose of reiterating the commitment to ethical principles and guidelines, with written evidence duly recorded.
- **Internal referral** to other areas of the Company, as applicable. The competent areas shall decide whether or not to adopt the recommended actions, and the corresponding record thereof shall be duly documented. Such referrals may be carried out when the following events are identified, without being limited thereto:
 - Identification of alleged breaches in risk management or internal control, in order to determine whether the event corresponds to: (i) the materialization of a business/process risk; (ii) the absence of a business/process risk cause or event; (iii) the absence and/or failure of a mitigator (control and/or Action Plan) associated with the business/process risk; or (iv) the override of the Company's Internal Control System by an individual (not manageable by GIR-GCI), and to implement the applicable mitigation measures.
- **Referral to competent authorities:** the Office of the Attorney General (Fiscalía General de la Nación), the Office of the Comptroller General (Contraloría General de la República), the Office of the Inspector General (Procuraduría General de la Nación), Superintendencies, the Central Board of Accountants (Junta Central de Contadores), the Superior Council of the Judiciary (Consejo Superior de la Judicatura), the Financial Intelligence Unit (UIAF), or whoever acts in their stead, among other authorities or state entities, for their awareness and within their respective jurisdiction, when applicable.


Internal or external transfers proposed by the Ad Hoc Ethics and Compliance Reviewer shall be authorized by the Chair of the CAUD and submitted by whomever this body designates; internal or external transfers related to cases that fall under the authority of the Compliance Management of subordinate companies shall be authorized and submitted by the Compliance Manager of the respective subordinate company.

3.1.5.3. Actions Arising from the Ethics Committee of Ecopetrol S.A.

The Committee shall decide on the closing actions recommended in the verification closing report that have an impact on the employment relationship of the involved employee(s), in accordance with the provisions set forth in its Internal Regulations (SCU-R-001).

3.1.5.4. Actions Arising from the Corporate Legal Vice Presidency and General Secretariat and the Administrative and Services Vice Presidency of Ecopetrol S.A.

With respect to contractors, suppliers, customers, allies, and partners: termination of the contract with the Ecopetrol Group, design and implementation of an improvement plan, enforcement measures, among others, in accordance with the review conducted by these Vice Presidencies, considering the recommendations issued in the verification closing report.

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3.1.6. Special Considerations Related to Alleged Situations of Harassment or Sexual Violence

Sexual harassment or sexual violence are categorically rejected by the Ecopetrol Group, as they constitute conduct that impacts human rights, affecting the well-being, safety, dignity, and integrity of individuals.

Las verificaciones relacionadas con la presunta comisión de estas conductas se desarrollarán en armonía con la Guía para la Prevención y Atención del Acoso sexual y/o Discriminación en el ámbito laboral, que aborda estas situaciones integralmente y brinda protección, confidencialidad, y herramientas que evitan preventing revictimization and encompassing all measures aimed at fostering a safe environment for alleged victims, without thereby disregarding the fundamental rights of the alleged aggressor, including the presumption of innocence.

Verifiers responsible for matters falling under this typology shall receive specialized training and instruction, given the nature and implications of such conduct.


3.2. Dilemmas and Inquiries

With respect to dilemmas and inquiries, a timely, complete, substantive, and specific response shall be provided by the ethics and compliance professionals designated by the Ethics and Compliance Management, provided that the information supplied by the inquiring party is sufficient and appropriate. Such response shall include the corresponding recommendations and action plans, which shall be mandatory for the areas and employees involved.

Patterns shall be defined, and actions aimed at the continuous improvement of the process shall be established, and precedents by subject matter shall be identified in order to strengthen the preventive approach.

Ethics dilemmas and inquiries shall be submitted through the Ethics Line, and the following stages shall be followed, as applicable:

- **Registration** in the Ethics Line by the user.
- **Referral to the competent internal area**, when the matter should not be handled through the Ethics Line, as indicated in this procedure.
- **Analysis of the attributes of the matter**, taking into consideration its impact, credibility, complexity, security conditions, and urgency.
- **Assignment of the professional**, taking into account the characteristics of the matter, the experience and profile of the members of the work teams, including their academic background and professional experience related to the subject matters of previously assigned cases.

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COMPETENT AUTHORITY	SCOPE OF AUTHORITY
Ecopetrol's Ethics and Compliance Management	Ethics dilemmas and inquiries of Ecopetrol submitted by members of the Boards of Directors, Presidents, Vice Presidents, and Compliance Managers, as well as Compliance Officers of the subsidiary companies or whoever acts in their place, and, on a residual basis, any other dilemmas and inquiries submitted.
Compliance Managers of the Subsidiary Companies or Whoever Acts in Their Place	Ethics dilemmas and inquiries of the subsidiary companies that do not have a specific authority or scope of responsibility defined within Ecopetrol.

- **Adoption of preservation measures**, such as requirements for the custody of relevant information; capture of company information stored in the various corporate physical or electronic media; securing the corresponding images; copying of information recorded in technological tools or accounting records, among others, in accordance with the applicable current regulations, the corporate technological tools made available for this purpose, and taking into account the management of the risks applicable to the measure adopted.
- **Request for additional information**, when the inquiry or dilemma does not contain the information necessary for its management, the professional may submit requests for supplementation or expansion of information to the requesting party. If no response is received or if the information provided is insufficient, the matter shall be closed under the status "Insufficient Information," informing the inquiring party that a new request must be submitted with the necessary information in order to obtain a substantive response thereto.
- **Substantive response to every inquiry or dilemma, addressed** to the requesting party, provided that the inquiring party has submitted all the information necessary for the corresponding analysis.
- **Closure of the matter in the system**, following the prior uploading of the response and the corresponding supporting evidence.

The Ethics and Compliance Management shall monitor the follow-up of the closing actions recommended to the competent areas and shall provide the support required by such areas, provided that this is feasible within the scope of its authority.

3.3. Timeframes for Decision-Making on Matters

- **High-impact** reports or complaints (within the scope of responsibility of the President of the CAUD): ninety (90) business days.

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- **Compliance-related reports or complaints** (corruption, bribery, fraud, FCPA, SOX, ML/TF/FPADM, anti-competitive practices, sexual harassment and sexual violence): seventy (70) business days.
- **Ethics-related reports or complaints (those that do not involve compliance-related typologies):** fifty (50) business days.
- **Ethics- or compliance-related reports or complaints – subsidiary** companies, depending on the number of reports received annually, the following timeframes shall apply:
 - When the number of reports received during the previous year exceeds fifty (50), the maximum timeframe shall be fifty-five (55) business days.
 - When the number of reports received during the previous year is fewer than fifty (50), the maximum timeframe shall be thirty (30) business days.
- **Ethics dilemmas and inquiries:** five (5) business days.


An extension may be requested and authorized, stating its purpose, progress to date, and justification. In the case of reports that must be prioritized, the applicable timeframes may be reduced, in accordance with the defined methodological plan. Timeframes shall be calculated starting from the first business day following the registration of the report through the Ethics Line.

4. CONTINGENCIAS


Not applicable.

VERSION HISTORY

Previous Document			
Versión	Date dd/mm/aaaa	Document Code and Title	Document Code and Title


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3	15/12/2025		<p>The role of Ad Hoc Compliance Officer is replaced by that of Ad Hoc Ethics and Compliance Verifier, and the requirements for enabling the designation of the Ad Hoc Ethics and Compliance Verifier, as well as the conditions for the performance of its functions, are updated in the Procedure for the Management of Ethics and Compliance Matters.</p> <p>The content of the Procedure is updated in accordance with the structure of the Corporate Compliance Directorate and its roles and responsibilities, the competent areas responsible for handling matters, the closing timeframes, and the best practices applicable to the subject matter.</p> <p>The Guide for the Management of Ethics or Compliance Verifications under the responsibility of the Ethics and Compliance Management of Ecopetrol S.A., as well as the Interview Guidelines for Ethics and Compliance Verifications, are incorporated.</p>
2	16/07/2025		<p>The requirements to enable the designation of the Ad Hoc Compliance Officer, as well as the conditions for the performance of its functions, are regulated in the Procedure for the Management of Ethics and Compliance Matters.</p> <p>A review is conducted by the Corporate and Corporate Affairs Management of the Corporate Legal Vice Presidency and General Secretariat in order to verify the correct use of terminology and to define the scope of this document for Ecopetrol Group companies, in accordance with the applicable criteria as set forth in the Corporate Governance Model.</p>

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1	11/02/2025		<p>The content of the Ethics and Compliance Matters Management Procedure VEI-P-001 is updated in accordance with the structure of the Corporate Compliance Directorate and its roles and responsibilities, the competent areas responsible for handling matters, the closing timeframes, and the best practices applicable to the subject matter. The scope is expanded to include Ecopetrol's subsidiary companies.</p> <p>A review is conducted by the Corporate Governance Management of the General Secretariat in order to verify the correct use of terminology and to define the scope of this document for Ecopetrol Group companies, in accordance with the criteria set forth in the Corporate Governance Model.</p> <p>The content of the Procedure is updated in accordance with the structure of the Corporate Compliance Directorate and its roles and responsibilities, the competent areas responsible for handling matters, the closing timeframes, and the best practices applicable to the subject matter.</p>
New Document			
Version	Date dd/mm/yyyy	Changes	
N/A	N/A	N/A	

For further information, please contact:	
<p>Autor(es): Lesly Marcela Ariza Carreño; Carolina Soares Garzón Buzón: lesly.ariza@ecopetrol.com.co; carolina.soares@ecopetrol.com.co Department: Ethics and Compliance Management</p>	
Electronically reviewed by:	Electronically approved by:

 <small>ECP INFORMACION EN</small>	Procedure for the Management of Ethical and Compliance Matters		
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FERNANDO BETANCOURT BERMEO Ethics and Compliance Verification Leader Citizen Identification No. 16,938,053 – Ethics and Compliance Manager	LUIS ENRIQUE CABEZAS LEAL Ethics and Compliance Manager Citizen Identification No. 79,569,918 Ethics and Compliance Management
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*This document is electronically signed, in accordance with the provisions of **Decree 2364 of 2012**, which regulates Article 7 of Law 527 of 1999 regarding electronic signatures and establishes other related provisions.*

*To verify compliance with this mechanism, the system **generates an electronic report that evidences the traceability of the review and approval actions** carried out by the responsible parties. Should verification of this information be required, such report may be requested from the Service Desk.*