

ANNUAL CORPORATE GOVERNANCE REPORT

Pursuant to the provisions established in Section 21 of Article 26 of the By-laws and Section 5 of Chapter 3 of the Corporate Governance Code, Ecopetrol's Board of Directors, on behalf of the Company President, has presented the General Shareholders Assembly with the following report on compliance with the Corporate Governance Code:

1. Modifications to the Code of Good Governance

In a meeting held on December 11, 2009, the Board of Directors authorized several modifications to Ecopetrol's Code of Good Governance in order to clarify certain aspects relating to the Board of Director's Committees, redefine the networking strategy with Stakeholders, include other entities that exercise a certain degree of control over the Company and update the functions of the Office of Disciplinary Control.

As one of the best practices of corporate governance, the modifications to the Code were reported to the Stakeholders and the market in general by way of a notice published as relevant information and in a widely circulated national newspaper.

2. Important Changes at Ecopetrol

Structure of Equity Interest

During the year 2009, holding by individuals decreased by 0.90% (363 million shares), mainly due to the increase in value of the price per share, the termination of payments in installments and the creation of collective portfolios.

CAPITAL STRUCTURE OF ECOPETROL S.A.				
DECEMBER 31, 2008			DECEMBER 31, 2009	
SHAREHOLDERS	INTEREST	No. OF SHARES	INTEREST	No. OF SHARES
Nation	89,90%	36.384.788.817	89,90%	36.384.788.817
Pension Funds	3,89%	1.575.286.565	4,71%	1.908.244.461
Individuals	5,17%	2.093.018.808	4,27%	1.729.901.400
Foreign Companies and Funds	0,13%	52.871.051	0,18%	73.890.381
Companies	0,81%	329.748.347	0,74%	299.866.208
ECP ADR Program Fund	0,09%	36.799.000	0,19%	75.821.321
TOTAL	100%	40,472,512,588	100%	40,472,512,588

Ecopetrol Corporate Group

Due to the declaration of Ecopetrol Corporate Group, the Company has defined strategies, policies and procedures to make sure subordinated companies adhere to the Group's corporate objectives in order to be able to guarantee a high degree of transparency, competitiveness and ethical direction to promote mutual confidence with its Stakeholders.

In order to fulfill the minimum guidelines of corporate governance, Ecopetrol established providing support for subordinated companies in the design and release of their Corporate Governance Codes as one of its milestones for the year 2009.

In 2009, Ecopetrol carried continued to develop its investment strategy and consolidate its Corporate Group. The company stepped up its involvement in offshore exploratory blocks and production fields. In the refining segment, it increased its share in the Cartagena Refinery, strengthened its strategic position in the most important oil transport conduit in Colombia and consolidated a suitable investment system for the execution of projects and business overseas.

The Corporate Group's structure can be looked up on Ecopetrol's website www.ecopetrol.com.co

3. Important Changes in the Corporate Frame of Reference

Code of Ethics

The Code of Ethics was adjusted in 2009 in order to guarantee compliance with international standards. Corporate regulations were also updated, including processes to deal with cases, measure knowledge and lessons learned as regards ethics.

In order to deal with cases or situations involving possible non-ethical conduct, the following channels of communication were opened for interested parties: e-mail codigodeetica@ecopetrol.com.co, the ethics and transparency hotline 018000 918418, phone number 2345000, fax 2344100 and personalized service by the leader on the matter. Similarly, the Board of Directors approved the Ethics and Compliance Process and the creation of the Ethics Committee.

During the year 2009, the Code of Ethics was broadly disseminated among the Company's Board of Directors, workers, suppliers and contractors, through workshops, lectures, forums, statements and messages. It is important to point out that the Code of Ethics forms a part of the contents of Ecopetrol's induction processes and the documents that make up the contracting processes.

Once the first phase of disseminating the Code of Ethics ended, a first measurement was taken to determine the level of understanding of 3731 people (2321 workers and 1410 contractors). Action plans were designed based on the results of the measurement, and as of September 2009, lessons learned have been published based on reflections on actual cases, which are considered worthy of sharing due to their frequency and impact.

4. Compliance with the Corporate Governance Code

4.1. Rights and Equal Treatment to Shareholders

Political and Economic Rights

During the annual Shareholders Assembly held on March 26, 2009, attending shareholders exercised their political right to participate in the deliberations of the highest decision-making body and approved an annual dividend per share of \$220 pesos (made up of an ordinary dividend of \$115 and a bonus of \$105), payable in three installments in the months of April, October and December. In compliance with the orders given by the Assembly, Ecopetrol paid out the dividends to all listed shareholders within 10 trading days immediately prior to their payment date.

Identification of the Main Shareholders

In compliance with the corporate governance practices, Ecopetrol's website reported the Company's capital structure, indicating the 20 shareholders with the most shares.

Investor and Shareholder Relations Office

Ecopetrol has an Investor and Shareholder Relations Office located in the city of Bogotá, Calle 81 No. 19A-18, Edificio Country, 2nd Floor, where shareholders' requirements are taken care of. In addition, Ecopetrol has the following channels to serve its shareholders and investors: toll free line for the issuance of shares program nationwide, 01 8000 113434, in Bogotá, 3077075; e-mail accionistas@ecopetrol.com.co or investors@ecopetrol.com.co (for Ecopetrol investors); fax 429 24 92 in Bogotá.

In 2009, a total of 33,547 requests were made through the different channels made available for shareholder service, including: Call Center (16,221), Shareholder Service Office (3700), Shareholder e-mail (2224), Requests in writing and Rights to Petition (1609), Shareholder Bus (3024) and Shareholder Fairs (398). Part of these requests was due to proactive campaigns to review and update the shareholder databases, which was done by the Company's service team (6371). 99.9% of the requests were taken care of and settled properly; the other 0.1% could not be solved due to the shareholders' failure to provide the documentation to carry out the respective process.

In comparison with 2008, requests dropped 80% from 164,826 in 2008 to 33,547 in 2009. This decrease is the result of the Company's constant efforts to keep its shareholders informed as regards the stock market, as well as its continuous improvement in its service processes.

Economic Relations with the Majority Shareholder

Ecopetrol's economic relations with the Nation, its majority shareholder, consolidated in 2009 through agreements and contracts, were carried out within the scope of the limitations established by Law, regulations on conflict of interest and market conditions. It is important to point out that the intent of these relations is not to benefit the Nation as Ecopetrol's majority shareholder, nor do they go against the interests of minority shareholders. On the contrary, in its contractual relations with the Nation, Ecopetrol leverages the fulfillment of its corporate objectives, plays a role in the construction of a Social State based on the Rule of Law, and strengthens its model of Corporate Social Responsibility.

According to the information provided by different areas of the Company, approximately 213 agreements and/or contracts were signed or in force with the Nation in 2009. To this effect, the agreements and/or contracts with the entities that form a part of the executive branch of public power nationwide were taken into consideration.

The information regarding these agreements and/or contracts can be referred to on Ecopetrol's website.

4.2. General Shareholders Assembly

In compliance with the provisions established in the By-laws, Ecopetrol published the notice of the General Shareholders Meeting, which was held on March 26, 2009, in widely circulated national newspapers on February 24, 2009. In addition, and in line with the corporate governance practices

adopted by the Company, on Sunday, March 22, 2009, management reminded shareholders of the date of the Assembly and the mechanisms of representation therein using the same medium.

During the legal and statutory period of 15 business days prior to the meeting of the highest decision-making body, all pertinent documents and papers were made available to shareholders in order for them to exercise their right to inspection.

In order to guarantee transparency, the Company used its website to publish all the supporting documents for the Assembly, such as the notification and reminder of the meeting, agenda, management proposals, the Nation's candidates – in its capacity as the majority shareholder – to be members of Ecopetrol's Board of Directors, and their respective CVs.

The Assembly had the quorum required by Law and the By-laws to validly deliberate and make decisions. Shareholders exercised their right to vote and the topics of the agenda subject to votes were passed. The course of the Assembly was broadcast live on TV (institutional channel) and Ecopetrol's website.

It is important to point out that eight out of nine members of the Company's Board of Directors attended the assembly, and several modifications to the Internal Regulations of the Assembly were passed in order to establish the procedure for the integration and functioning of the Committee to Review and Approve the Minutes, update the post of Assembly Secretary and clarify the fact that shareholder interventions are to be limited to the topic of the agenda being discussed.

The Minutes were signed by the President of the Assembly, the Secretary and the members of the Alternate Committee to Review and Approve the Minutes designated by the shareholders. The Minutes also contain the topics introduced, the approvals and authorizations granted by the Assembly and the observations made by shareholders.

In compliance with the stock market regulations applicable to Ecopetrol, a copy of the Minutes was sent to the Colombian Financial Superintendence in due time. The full text of the Minutes was made available to Shareholders on the Company's website.

The decisions contained in the Minutes that were subject to registration, were duly listed at the Chamber of Commerce.

4.3. Board of Directors

At the General Shareholders Assembly held on March 26, 2009, shareholders elected the list of candidates suggested by the Nation, represented by the Ministry of Finance and Public Credit, using the electoral quotient system for a one-year period, consisting of 6 independent members and 3 non-independents. In compliance with the corporate governance practices, the independent members of the Board of Directors committed in writing, upon accepting the position, to maintain their capacity as independents while carrying out their functions.

In compliance with the provisions established in Article 5 of Law 1118 / 2006 and the Nation's Declaration in its capacity as Majority Shareholders, the eighth (8) and ninth (9) place of the Board of Directors were filled respectively, by the representative designated by the Departments Producing Hydrocarbons developed by Ecopetrol and the representative designated by the 10 minority shareholders with the most shareholding.

The table below illustrates the attendance of the members of the Board of Directors at the meetings of said body, as well as the meetings of the 4 specialized Committees:

Attendance at Board of Directors and Committee Meetings					
Board Member	Board of Directors	Auditing Committee	Corporate Governance Committee	Business Committee	Compensation and Nomination Committee
Minister of Mines and Energy	14/15			11/12	3/3
Minister of Finance and Public Credit	13/15		5/5		
National Director of Planning	13/15			10/12	
Fabio Echeverri Correa	12/15				3/3
Ignacio Sanín Bernal	14/15	16/18	5/5		
Maria E. Velasquez Restrepo	12/15	13/18		8/12	
Joaquin Moreno Uribe	13/15	16/18		10/12	
German Bernal Gutierrez	15/15		5/5		3/3
Mauricio Cárdenas Santamaria	15/15	17/18		12/12	

** Information for period ending on February 28, 2010 **

Pursuant to the decision adopted by Ecopetrol's General Shareholders Assembly on March 27, 2008, the attendance fees for the members of the Board of Directors for meetings of the Board and/or internal Committees to be attended in person would be 4 minimum monthly wages (MMW), which was the equivalent of \$1,987,600 Pesos in the year 2009, and \$2,060,000 in the year 2010, minus the VAT and the Industry and Commerce taxes withheld at the source. Attendance of meetings via teleconference is paid at 50% of the fees established for meetings attended in person.

Board of Directors Member Fees	
Board Member	Fees
Minister of Mines and Energy	58'634.200
Minister of Finance and Public Credit	36'770.600
National Director of Planning	30'807.800
Fabio Echeverri Correa	38'938.891
Ignacio Sanin Bernal	63'455.970
Maria E. Velasquez Restrepo	65'590.800
Joaquin Moreno Uribe	76'523.600
German Bernal Gutierrez	33'789.200
Mauricio Cárdenas Santamaria	80'497.800

** Information for period ending on December 31, 2009 **

On another note and in compliance of the best practices of corporate governance, the following is a list of the number of Shares of Ecopetrol held by Board members to December 31, 2009:

Board of Directors Member Shares	
Board Member	No. of Shares for period ending on December 31, 2009
Minister of Mines and Energy	1.000
Minister of Finance and Public Credit	0
National Director of Planning	0
Fabio Echeverri Correa	0
Ignacio Sanin Bernal	0
Maria E. Velasquez Restrepo	0
Joaquin Moreno Uribe	50.000
German Bernal Gutierrez	0
Mauricio Cárdenas Santamaria	2.000

** Information for period ending on December 31, 2009 **

The Secretary General sent the supporting documents of the Board and Committee meetings in time for the thorough fulfillment of the Board members' functions.

At each meeting, compliance with the quorum established in the Company's By-laws was verified and the respective agenda and minutes of the previous meeting were approved.

The minutes of Board meetings are numbered and kept in a binder, stamped by the Bogotá Chamber of Commerce in consecutive order; the binder is safeguarded in the archives of Ecopetrol's Secretary General.

The average length of Board sessions was 8 hours. The sessions held outside Bogotá went on for 10 hours, including the industrial visit and covering the established agenda.

In compliance with the best practices of corporate governance, the Board of Directors was evaluated qualitatively and quantitatively.

On the qualitative self-evaluation, an average of 99.75% of the members stated that the behavior during the course of their functions for the period was as required. In addition, in order to have an idea of the Board members' understanding of specific topics reviewed in the internal committees, and pursuant to the plan for improvement suggested in 2009, management implemented qualitative self-evaluations for the Board's Committees.

The results on the quantitative evaluation were 95.23% (level of fulfillment of the goals established on the Board's Balanced Scorecard).

For further information regarding the operation of the Board of Directors, refer to the complete Report published on Ecopetrol's website.

4.4. Chief Executive and Other Officers

Pursuant to the provisions established in the legal regulations, besides the Board of Directors, Ecopetrol's management consists of the Company President, Vice Presidents, Managers, Directors and all officers in general who, based on the responsibility of their positions, act on behalf of the Company. Ecopetrol's website lists the professional attributes and labor history of the Company's management.

Administrators or senior executives play a role in achieving the corporate objectives through the strategic management of their respective areas and the performance of different activities. They are evaluated based on the indicators established in the Balanced Scorecard of their respective areas and the terms established in the performance agreement signed with their supervisor. The results of the [performance assessment of the senior executives](#) can be consulted at Ecopetrol's website.

The Board of Directors assessed the performance of Ecopetrol's President, Javier Gutierrez Pemberthy at 93.11% considering the objectives achieved on the highest ranking indicators on the Company's Balanced Scorecard and the evaluation of his leadership and organizational skills.

The Company has clear policies for the selection and payment of senior executives. Since Ecopetrol is one of the most attractive companies to work for in Colombia, it has very demanding selection processes. Therefore, the Vice Presidency of Human Talent conducts market research and attends events of the oil industry in order to guarantee the flow of candidates to fill its requirements. Furthermore, the Vice Presidency has the counsel of firms specialized in searching for and evaluating senior executives nationwide and worldwide for internal and external selection processes for operative, tactical and strategic leaders.

With a view to be more attractive on the labor market, the Company strengthened the employment value proposal in 2009, consisting of attributes relating to pay, benefits and opportunities for development and wellbeing, which are considered the most important variables by candidates from the oil and gas sector when considering a job offer.

In order to attract and retain the personnel required by the strategy, Ecopetrol's Board of Directors approved a fixed payment policy benchmarked in the oil sector, which it has been applying since 2007, which led to a decrease in resignations of the target population dropping from 69 people in 2007 to 18 over the last year.

In addition to fixed pay, workers are rewarded with variable bonuses that have no impact on wage to reward them for their results of the areas meeting organizational goals and considering that the Company is result-oriented.

It is important to point out that Ecopetrol's compensation policy does not include special mechanisms of payment or remuneration in Company stock for its workers or administrators.

4.5. Corporate Social Responsibility

The purpose of Ecopetrol's Corporate Social Responsibility Policy is to strengthen and manage relations with stakeholders in a responsible manner, based on the recognition of their needs and expectations, and the implementation of practices for mutual benefit in order to guarantee their confidence in company and its reputation, along with the long term sustainability of the business.

In order to do so, Ecopetrol establishes a result-based commitment with all stakeholders. In 2009, the average fulfillment of the commitments acquired with stakeholders was 85%. The results of management by stakeholders can be referred to in the Sustainability Report.

Accountability

During the year 2009, Ecopetrol's Stakeholders had the chance to come closer through the Citizen Participation Offices located in Bogotá, Barrancabermeja, Yopal, Apiay, Neiva and the Mobile Brigades carried out in Orito, Ortega, Tumaco, Bucaramanga, El Centro, Castilla, Acacias and Monterrey.

In addition, service was provided to Stakeholders through the Contact Center: 234 5000 in Bogotá, and 018000918418 for the rest of the country. They also had access to other channels such as e-mail participacion.ciudadana@ecopetrol.com.co; quejasysoluciones@ecopetrol.com.co, and the company's website www.ecopetrol.com.co in the "Online" link.

In 2009, over 10,700 citizen requests were received, including rights to petition, simple petitions, complaints and claims. In 2009, 96% of the requests and 99% of the rights to petition were dealt with within the established periods.

Finally, Public Accountability Hearings were held in Orito, Cucuta and Cartagena in the months of May, July and December, respectively.

4.6. Transparency, Fluency and Integrity of the Information Provided to the Public

Posting of Information on the Website

All year long, shareholders and investors had access to financial information, credit rating, corporate governance practices, the company's capital interest, stock performance, dividend policy, dividend payment date, projects underway, conformation of the Board of Directors and Auditor Reports on this medium.

In 2009, the website was accessed an average of 7855 times per day. The most visited sites were "Work with Us", which provides information on Ecopetrol's selection and employment policy and receives résumés; the "Supplier" site, where you can check public contracting processes and active suppliers can track the payment of their invoices, and the "Shareholders" site, where shareholders can find information on the payment of dividends, important information reported to the Colombian Finance Governmental Authority, financial and operative results, and the performance of Ecopetrol stock, among others. It is important to point out that the financial information provided on the website is updated on a quarterly basis, and it is the same information presented to the Board of Directors. The information provided is collected and prepared pursuant to the professional practices, criteria and principles on which the financial statements are based and are just as reliable.

During the live broadcast of the General Shareholders Assembly held on March 26, 2009, the website was accessed 3752 times from 25 different countries.

In 2009, different updates were made on the portal, such as the creation of a button for natural gas clients, providing a multimedia description of the gas value chain, its uses, the gas pipeline network and the country's production fields. Similarly, a map was posted containing the exploratory projects in

which Ecopetrol has undergone Prior Consultation processes with neighboring indigenous and/or afro-Colombian communities, providing information on the projects and their progress by surfing through each of the blocks.

In addition, a strategy was developed to fulfill the 2009 phases that make up the Government Online program, an initiative led by the Ministry of Information Technologies and Communications, whose purpose is to make the State's relationship with citizens more efficient and transparent through the use of technology. As a part of this project, the 24-hour Chat service was enabled as an additional medium for the Company's Stakeholders to receive support regarding the information and applications available on the website. A site was also created for children, where Pet, Ecopetrol's mascot, takes an instructive tour through the oil chain, and a survey module was enabled to learn users' perceptions as regards different topics and a glossary with the most commonly used terms of the oil industry and the stock market.

Dissemination of Relevant Information to the Colombian Finance Governmental Authority and the Securities and Exchange Commission (SEC)

In 2009, 128 statements of Relevant Information were published at the Colombian Finance Governmental Authority. Given the obligation to report information simultaneously on the markets on which the company has listed stock, 76 press releases were published in the United States, along with 40 documents using Form 6-K as required by the Securities and Exchange Commission (SEC). All the statements were released in a timely manner and are available on the Comprehensive Stock Market Information System (SIMEV in Spanish), as well as the Company's website.

As part of the relevant information, one of Ecopetrol's most important obligations as a securities issuer in Colombia and the United States consists of revealing the Company's operating and financial results. In 2009, the 20-F report was published and 4 quarterly releases were made, substantially improving the timeliness and content of the reports provided.

In addition, the Regulations for the Dissemination of Relevant Information was updated in order to include the obligations to be fulfilled by Ecopetrol on the matter as a securities issuer in Colombia and the United States.

4.7. Control Structure

External Control

- **Statutory Auditor:** The General Shareholders Assembly held on March 26, 2009 authorized the contracting of Pricewaterhousecoopers Ltda. as Ecopetrol's Statutory Auditor for the 2009 period and authorized the Board of Directors' Auditing Committee to assign additional jobs throughout the year. The recommendation made by the Auditing Committee on appointing the Auditor was based to the fact that the firm had a qualified team, demonstrated quality in the services provided in 2008, extensive expertise in the industry and the Company, its methodology satisfies the Company's needs, it offered the most favorable price, and certified its independence as regards conflicts of interest, inabilities and incompatibilities.

The results of the evaluations conducted by the Statutory Auditor and the progress of the Plans for Improvement resulting from the audits were informed periodically through reports to Executive Management and presentations to the Board of Directors' Auditing Committee.

- **Inspection, Surveillance and Control Agencies:** In 2009, Ecopetrol provided the information required by government regulation agencies exercising a certain degree of control over the Company, such as the Colombian Utilities Governmental Authority, Colombian Finance Governmental Authority and the Colombian Corporate Governmental Authority.
- **Comptroller General of the Republic:** The Plan for Improvement corresponding to the Financial Audit for the 2007 period consisted of 184 actions, 95% of which have been carried out to December 31, 2009 with a fulfillment of 98%.
- **Risk Rating Agencies:** Fitch Ratings Colombia S.A. reiterated its domestic AAA rating for Ecopetrol's corporate debt. The securities rated in the corporate debt category are considered securities of the highest grade. Risk factors are practically inexistent, according to the agency's rating scale.

Similarly, Fitch Ratings, Standard and Poors and Moody's Investor Services, rated Ecopetrol BB+, BB+ and Baa2 respectively, for its foreign currency debt. Ecopetrol's rating is based on the Company's solid financial profile, a high perception by agencies regarding the probability that the Colombian Government will provide the Company with sufficient, timely backing if required, in addition to its leading position in the oil and gas industry in Colombia, as well as its proven access to capital markets.

Internal Control

- **Internal Audit Department:** The General Audit Plan 2009 was fulfilled 100%. Business, financial and supporting processes were evaluated pursuant to the Planning approved by the Board of Director's Auditing Committee, and opportunities for improvement were identified to strengthen the Internal Control System of the processes audited.

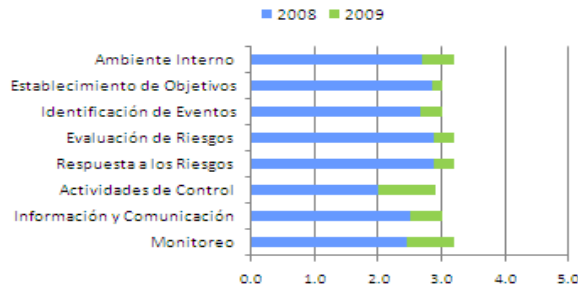
As a result of these evaluations, the areas in charge prepared Plans for Improvement focused on mitigating the critical risks of the processes and improving the effectiveness of controls, pursuant to the recommendations made by the Internal Audit Department.

- **Internal Control System:** In 2009, Ecopetrol carried on with its efforts to strengthen its Internal Control System based on the COSO (Committee of Sponsoring Organizations of the Treadway Commission) international standard. The strengthening project has included initiatives such as SOX (financial and accounting controls), the implementation of the COBIT (Control Objectives for information and Related Technology) reference framework for IT management and the incorporation of international practices in the Internal Auditing function.

The Internal Control system is a part of Ecopetrol's commitment and efforts to generate a reasonable degree of confidence and security for its shareholders and other stakeholders regarding the achievement of its strategic and operating objectives, as well as the goals regarding reports on financial and non-financial information, and legal compliance.

As a final result for the 2009 period, the Internal Control System reached a level of development that enabled company management to set up internal controls on all the organization's processes, evaluate them on a periodic basis and determine and act on significant matters of control.

**Desarrollo del Sistema de Control Interno
Nivel de Madurez del SCI**



Meta	Real	Estado	Cumplimiento
3	3.1		103%

Risk Management

Ecopetrol has a Comprehensive Risk Management System focused on playing a role in the fulfillment of objectives, the preservation and creation of value for the Company and responding to unexpected events.

In 2009, the Risk Record of all the Company's processes at level 0 were updated pursuant to the new process map defined that year. 50% of the risks were concentrated at the High level and 9% were Very High. Moreover, Ecopetrol's Corporate Risk Map was created, consisting of the following 12 risks:

ECOPETROL S.A. Corporate Risks - 2009

Incidents with Potential Impact on People, the Environment and Operations

Deficient search for, structuring and selection of opportunities to create a robust investment portfolio

Deficient project execution (cost, timeliness, quality)

Deficient incorporation of hydrocarbon reserves

Lack of human talent with the required qualifications

Changes in the environment and/or market variables

Loss of continuity in the business

Deficient treatment of Stakeholders

Leaking or loss of critical information

Lack of reliability and effectiveness of management and control systems

Lack of required Financing and Liquidity

Lack of alignment between growth rate and the corporate group's management capacity

4.8. Conflicts of Interest

Ecopetrol has concrete mechanisms to prevent, handle and disseminate conflicts of interest that may arise among shareholders (majority and minority), administrators and officers in general, as regards their own interests and those of the Company.

In order to avoid incurring in a conflict of interest, the following administrators and officers carried out the procedure established by the Company in 2009 and revealed situations that could give rise thereto:

- The Ministry of Mines and Energy abstained from participating in topics relating to the National Hydrocarbon Agency as it was still president of the Executive Council of the organization.
- Ecopetrol's Vice President of Supplying and Marketing abstained from participating in decisions relating the possible contracting of the company Sentido Verde by the Refined Product Management Unit under its responsibility.
- An officer from Ecopetrol's Provisioning of Goods and Services Department abstained from participating in the contracting processes related to the lines of materials provided by the suppliers Seguridad Protección & Soldadura and Tuvacol.
- Ecopetrol's Acting Director of Security abstained from participating in negotiations for contracts and/or agreements with the company Metapetroleum.

4.9. Mechanisms for the resolution of controversies

Ecopetrol has alternative mechanisms to settle disputes to promote foreign investment, commercial relations and facilitate coexistence among shareholders, stakeholders and Company management. These mechanisms, such as direct settlement, "amiable compositeur", conciliators and arbitration, have become an alternative, other than the regular conduct of ordinary justice, to settle contractual disputes in a quick, specialized and, in certain cases, less expensive manner.

Controversies with Shareholders

Pursuant to the provisions established in Article 3 of Law 1118 / 2006, Ecopetrol's stock issuance and placement program would include two first rounds, which could be accessed by the special beneficiaries as discussed in Article 3 of Law 226 / 1995, that is to say, Ecopetrol's pension trusts, territorial entities and all Colombian citizens.

However, after reviewing the database of the people who were awarded shares, it was found that 25 applications submitted by foreigners and 6 by companies, which were not the target audience of the first public stock offering, were accepted.

In the first place, placement companies were approached to ask them to take the steps necessary to return the shares. 22 of the 25 cases involving foreigners have been settled amicably; the remaining 3 are being dealt with through the legal advisor. Similarly, 4 of the 6 company cases were settled amicably.

Controversies with Associates

On another note, it is important to point out that in 2009, Ecopetrol and several of its Associates in Association Contracts decided to use alternative mechanisms to settle controversies. The following is a summary of some of these processes:

Process	Contract and Conflict	Alternative Mechanism
Mansarovar Energy Colombia Ltd vs. Ecopetrol	Cocomá Association Contract (Contract Termination Date)	Court of Arbitration. On February 12, 2010, the Court of Arbitration announced its decision putting an end to the disagreement submitted by the parties as regards the Contract termination date in favor of Ecopetrol in its technical - contractual position. The decision is not final yet, whenever a hearing is needed for clarification and enforcement within.
Ecopetrol vs. HUPECOL.	Caracara Association Contract (Reimbursements in extensive testing).	Court of Arbitration. The conflict began in 2008, but on June 18, 2009, the Board announced its decision in favor of Ecopetrol on the matter of reimbursements in extensive testing.
Ecopetrol vs. Hocol	Palermo Association Contract (Production extensive testing)	Direct Settlement. This conflict began in the year 2008, but ended in 2009. On April 1, 2009, the parties decided to submit a brief by mutual agreement and considering Ecopetrol's acquisition of Hocol, requesting the termination of the Board of Arbitration, pursuant to Section 2 of Article 167, Decree 1818 / 1998. Writ No. 7 / April 16, 2009 accepted the parties' request and ordered the cessation of functions in the arbitration process.
Ecopetrol vs. Emerald	Matambo Association Contract (Reimbursements in extensive testing).	Direct Settlement. Ecopetrol reached an agreement with Emerald, in which the signing of the official document is currently pending. The agreement took place under the protection of the direct settlement stage established in the association contract and will be recorded in the minutes of the executive committee.

** Information for period ending on February 28, 2010 **

4.10. Securities Trading

In compliance with the provisions established in Article 404 of the Business Code and the Corporate Governance Code, during the course of the year 2009, Ecopetrol's Board of Directors gave 34 authorizations for the purchase or sale of shares to Company administrators.

4.11. Shareholder and Investor Claims

In 2009, no claims were reported regarding compliance with the Corporate Governance Code through the hotlines and e-mails available to shareholders and the general public.

The Board of Director makes a recognition to Ecopetrol and all employees for their continued commitment in the implementation of corporate governance practices that ensure good governance, transparency and control of the Company.