



ANTI-CORRUPTION AND CITIZEN SERVICE PLAN 2020

**ANTI-CORRUPTION AND
CITIZEN SERVICE PLAN
ECOPETROL 2020**



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1. CONTEXT OF THE STANDARD

In compliance with legal provisions by 2020, Ecopetrol S.A. through this document has updated its Anti-Corruption Plan for the 2020 period, in order to contribute to strengthening the management of the risks identified in the company. This plan is disclosed in order to the citizens to know about the actions that state entities perform to manage the risk of corruption. ECOPETROL works in accordance to the directives and guidelines of the national government not only to work against corruption, but also to improve the different mechanisms of citizen service that are available, building relationships of trust and mutual benefit with interest groups.

2. GENERAL INFORMATION OF ECOPETROL S.A.

A. What is Ecopetrol?

Ecopetrol S.A. is a Mixed Economy Society of a commercial nature¹, of the national order. The company is linked to the Ministry of Mines and Energy, in accordance to the provisions of Law 1118 of 2006; organized under the structure of a public limited company, it is governed by articles of association contained in Public Document No. 5314 of December 14, 2007 (Second Notary Office of the Notarial Circle of Bogotá D.C.), and modified by:

- Public Document No. 560 of May 23, 2011 (Forty six Notary Office of the Notarial Circle of Bogotá D.C.)
- Public Document No. 666 of May 7, 2013 (Sixty five Notary Office of the Notarial Circle of Bogotá D.C.)

- Public Document No. 1049 of May 19, 2015 (Second Notary Office of the Notarial Circle of Bogotá D.C.)

B. Higher purpose

When we say that Ecopetrol is "From All to All", we mean that our talent, leadership and team skills are at the service of the country's growth, well-being and development. That's why we are energy that transforms Colombia

C. Mission y Vision

MISSION

We work every day to build a better future:

- Profitable and sustainable.
- With a healthy, clean and safe operation.
- Ensuring operational excellence and transparency in each of our actions.
- Building mutually beneficial relationships with interest groups.

VISION

Ecopetrol will be an integrated company of world class in oil and gas, oriented to the generation of value and sustainability, with focus on Exploration and Production, committed to its environment and supported by its human talent and operational excellence.

D. Code of Ethics and Conduct

The Code of Ethics and Conduct is the compendium of rules that define the standards of behavior expected by the organization and the main guide to guide the actions of those who work at Ecopetrol S.A., the companies of the Group and all the other recipients of this, under the ethical principles

¹ Ecopetrol Bylaws.



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of integrity, responsibility, respect and commitment to life.

INTEGRITY

It is the behavior that makes us visible as righteous people, who are loyal, fair, objective, honest and transparent to the company and the society. A righteous person acts in coherence with the aforementioned characteristics, the applicable internal and external regulations, the principles and rules adopted by the organization to prevent violation of the ethical standards and expectations referred to in this Code. Acting in accordance with this conduct allows us to state that acts related to money laundering, terrorist financing, fraud, bribery and corruption (violations of the FCPA Law, gifts, entertainment and hospitality, conflicts of interest) and non-ethical conducts are not tolerated at all.

RESPONSABILIDAD

It is the moral obligation to make the best effort to achieve business objectives and ensure the efficient management of resources. Based on this principle, it is mandatory to do everything pertinent to fulfill corporate activities and goals, accepting the applicable provisions contained in the Political Constitution, local and foreign laws, internal regulations, as well as adopting the Internal Control System. Under this principle, the consequences of the decisions taken are accepted, as well as any omission and overreaching.

RESPECT

It is the ability to accept and recognize differences with others. Based on this principle, fundamental and social human rights are protected, while encouraging recognizing others without distinction of gender, orientation, race, nationality or family origin, language, religion, political or philosophical opinion, economic, physical or mental conditions. By virtue of this principle,

one acts in a cordial manner without making any discrimination or mistreating or attacking others, not speaking ill of others, nor affecting the image of the people or the Company.

COMMITMENT TO LIFE

These are self-care actions inside and outside the work, applying hygiene, safety and environment rules set out by Ecopetrol, as a mechanism for the defense of life, health and the environment.

3. OBJECTIVE

The objective of the Anti-corruption Plan is to have a management framework for identifying and controlling the risks of corruption, as well as for strengthening the mechanisms for attending and serving citizens, indicating the main elements for the control and monitoring of corruption in Ecopetrol and the identification of practices for the adequate attention to the citizen.

According to the document entitled "Strategies for the Construction of the Anti-corruption and Citizen Welfare Plan", Ecopetrol must draw up a strategy to combat corruption and provide assistance to citizens, taking into account the following components:

- a. **Methodology for the identification of corruption risks and actions for their management:** Identify, analyze and control possible corruption-generating events, both internal and external. Establishes the general criteria for the identification and prevention of the corruption risks of the entities, allowing the generation of alarms and the development of mechanisms aimed at preventing or avoiding them.

- b. **Anti-formalities strategy:** It seeks to facilitate access to services provided by the public administration. Each entity should simplify, standardize, eliminate, optimize and automate existing procedures, as well as bring the citizen closer to the services provided by the State, by modernizing and increasing the efficiency of its procedures.
- c. **Accountability:** Accountability to the citizen should be an ongoing exercise aimed at strengthening the citizen relationship. Because of its importance, entities are required to develop an annual accountability strategy and to include it in the strategies of the Anti-corruption and Citizen Service Plan.
- d. **Mechanisms to improve citizen service:** It seeks to improve the quality and accessibility of public administration procedures and services and to meet the needs of citizens.

It also raises the possibility of establishing strategies additional to those mentioned in the preceding paragraphs, aimed at promoting integrity, citizen participation, transparency and efficiency in the use of physical, financial, technological and human talent resources, in order to make the actions of the public administration visible.

4. SCOPE

The strategy for 2019 has been defined within the framework of:

- i) Identification, assessment and monitoring of compliance risk²

² Ecopetrol S.A. defines compliance controls as those related to the compliance of the laws and regulations applicable to the company, both internal and external regulations. Compliance controls emphasize fraud, which according to their classification, may have

- ii) Accountability, and
iii) Mechanisms for adequate service to the citizen.

The plan is disseminated through the Ecopetrol website, in the Anti-corruption Strategy section.

5. COMPONENTS OF THE PLAN

5.1 Corruption risk management - corruption risk map

Ecopetrol S.A, has identified the risks, designed compliance controls, and continuously monitors them, to prevent, detect and mitigate or correct materialization situations. These activities in order to comply with the highest standards and best practices, as well as the applicable Colombian legal provisions and others contained in the Foreign Corrupt Practices Act (FCPA) and the OECD (Organization for Economic Cooperation and Development) convention to combat bribery of foreign public official in international commercial transactions.

According to the guidelines of the Secretary of Transparency, Ecopetrol aims to achieve the following objectives:

- i) To achieve and maintain a culture of transparency, whose values of respect, integrity and responsibility are reflected daily in the actions of Ecopetrol's direct officials and their contractors.

the following types: misappropriation of assets; bribery; corruption; fraudulent reporting; money-laundering; and terrorist financing.

- ii) Comply with the requirements of local and international regulation applicable to Ecopetrol, including those related to the prevention of fraud, misappropriation of assets, corruption, bribery, fraudulent reports, money laundering and terrorist financing.
- iii) Training individuals in compliance risk prevention.
- iv) Enhancing synergy with the Internal Control System, which allows for comprehensive risk management.
- v) Strengthening analysis teams and screening mechanisms.
- vi) Mitigate the risks of compliance with the "Foreign Corrupt Practices Act (FCPA).
- vii) Consolidate a world-class compliance agenda.

5.1.1 Identification and analysis of corruption risk

Based on the analysis of the strategic framework, the risks that most divert Ecopetrol from meeting its strategic objectives were identified; for this exercise and taking into account the relevance and importance in the company on the management of the topics of fraud, corruption, LA/FT and ethical issues, by 2020 was identified and structured the business risk "Breaches to ethics and compliance", which frames a culture of zero tolerance to corruption.

This business risk is defined as inappropriate behavior associated with breaches of the Code of Ethics and prevention manuals, corruption, money laundering and terrorist financing by employees, contractors or third

parties who are related to Ecopetrol, that could generate an eventual economic, reputational or legal detriment for Ecopetrol.

In addition to the above-mentioned business risk, Ecopetrol S.A. conducts process risk management on an annual basis, through which the risks of the processes identified by the Company are identified, valued, treated and monitored, including the risks of compliance.

In this regard, as the process risk cycle is implemented, compliance risks are managed.

5.1.2 Corruption Risk Assessment and Corruption Risk Map

The risk assessment methodology of Ecopetrol includes, among other things, criteria for measuring probability and impact, which are referred to the criteria defined in the tool "Strategies for the construction of the Anti-corruption and Citizen Care Plan" as a regulatory complement to best practices implemented in this area. From the exercise of assessment and treatment of compliance risks, through the execution of the process risk cycle, Ecopetrol obtains the map and matrix of compliance risks, and the result of the inherent and residual assessment of compliance risks in the processes are represented in a heat map.

| | | PROBABILIDAD | | | | | |
|---------|--------------|---|---|---|--|---|------------------|
| | | El evento no se ha presentado en los últimos cinco (5) años | El evento se presentó una vez en los últimos 5 años | El evento se presentó una vez en los últimos 2 años | El evento se presentó una vez en el último año | Ha ocurrido más de una vez en el último año | |
| | | Raro | Improbable | Posible | Probable | Con Certeza | |
| | | A | B | C | D | E | |
| IMPACTO | Catastrófico | 5 | Nivel residual | | | | Riesgo inherente |
| | Mayor | 4 | | | | | |
| | Moderado | 3 | Nivel residual | | | | Nivel residual |

Heat Map for Compliance Risks

5.1.3 Monitoring the risks of corruption

The monitoring of compliance risks and the business risk of "Breaches of ethics and compliance" will be executed three times a year with a cut to April 30, August 31 and December 31. Additionally, the compliance risks of Ecopetrol processes are monitored by reviewing the compliance risk management and the effectiveness of the mitigating as proposed in the milestones corresponding to this numeral, that can be seen in the document "Anti-corruption and Citizen Service Plan 2020" annexed.

5.1.4 Activities on the plan 2020

The strategy defined for the mitigation of compliance risks for the present term consists of the following elements:

- Update of the compliance risk matrix supported in the risk management methodology of Ecopetrol S.A.
- Monitoring of compliance risks through the implementation of activities of the Corporate Ethics and

Compliance Management's monitoring and prevention plan, including the following:

Prevention

- Mediated communication on intranet Iris-ethics page, ethics line, Talks e +.
- Practical community in ethics and compliance +.
- Training program.

Monitoring

- Due diligence of counterparties. Identifying and analyze conflicts of interest.
- Disabilities and incompatibilities.
- Analysis and monitoring of bribery of government officials (PEPs).
- Corruption in contracting, partners and subsidiaries.

5.2 Rationalization of Procedures

Ecopetrol S.A. being a company of industrial character has no procedures registered in the Unique Information System of Formalities - SUIT, as reported to the Administrative Department of the Civil Service and in accordance with the concept issued on 2 March 2016 by the Legal Office of the Ministry of Mines and Energy, which concludes:

"Given the high-ranking and/or special nature of Law 142 of 1994 and Law 1118 of 2006, which applies to the companies providing the public electricity service and Ecopetrol respectively, they are not the recipients of the provisions of Decree 2482 of 2012".

5.3 Accountability

The accountability in Ecopetrol is a permanent and constant exercise that is performed through various mechanisms, in order to facilitate access to information for all interest groups. Such mechanisms are:



- A. Annual publication of the Integrated Sustainable Management Report: This report includes general information on the company, its value chain and its business processes, financial results, action behavior, risk management and, in general, the management of the company in its economic, social and environmental aspects. This can be consulted on the website of the entity (www.ecopetrol.com.co) in the following route: Inicio > Nuestra Empresa > Sala de Prensa > Publicaciones > Informes de Gestión y Sostenibilidad.
- B. Provide information corresponding to the EITI Report - Extractive Industries Transparency Initiative.
- C. Transmit the report on the implementation of best corporate practices (Country Code Survey) to the Financial Superintendence of Colombia.
- D. Execute the General Shareholders' Meeting: In the scenario that is held annually, the shareholders of the company are informed about the results of the company and the decisions of that corporate body.
- E. Include in the Integrated Report on Sustainable Management information

about the results of the Perception and Stakeholders Expectations Consultation.

- F. Generate the satisfaction report of the General Shareholders' Meeting based on the survey of attendees.
- G. Generate the Quarterly Report of the Company's results and achievement of goals.

5.4 Mechanisms to Improve Citizen Service

A proper exercise of Corporate Responsibility presupposes the existence of communication channels that contribute to maintaining and improving the relationship with our stakeholders.

To make this dialogue with its stakeholders a reality, Ecopetrol through the Citizen Participation Office (OPC) receives and manages petitions, complaints, complaints and suggestions (PQRS), ensuring a timely and quality response.

Similarly, Ecopetrol's Citizen Participation Office (OPC) leads participation scenarios that allow the Interest Groups to be informed about the activities developed by Ecopetrol and to know their perceptions. It has a number of channels of assistance to citizens, including:



Offices of correspondence. They operate in all the places where Ecopetrol has offices. Bogotá D.C. is located in the Carrera 7 No. 32-42, San Martín Floor 1.



Internet. Online form to submit petitions, complaints, complaints, suggestions or complaints published on the corporate website (www.ecopetrol.com.co > Inicio > Nuestra Empresa > Servicios de Información al Ciudadano > Contáctenos).



e-mail. The following mailboxes are available:
participacion.ciudadana@ecopetrol.com.co
quejasysoluciones@ecopetrol.com.co



Corporate Call Center. Free national telephone line: 01 8000 918418



Brigades of assistance. Personalized attention in municipalities without permanent presence of the company.



Teleiguanas. Telephone booths that communicate directly with the corporate call center located in the Caribbean, Casanare, Central, Huila, M. Medio, Meta, Occidente, Oriente and Nariño-Putumayo regions



Offices for personalized attention. Offices attended directly by Ecopetrol personnel located in different municipalities of the country, actually:

| Departament | City | Address |
|--------------------|-------------------|--|
| Bolívar | Cartagena | Mamonal KM 7, Edificio VIT Ecopetrol |
| Casanare | Yopal | Calle 37 N° 20-55 |
| Cundinamarca | Bogotá D.C. | Carrera 7 N° 37-73, Edificio Teusacá Piso 1 |
| Huila | Neiva | Transversal 9AW N° 7-86, Frente al Puente El Tizón |
| Meta | Acacias | Calle 14 N° 12-51, Barrio Juan Mellao |
| | Castilla La Nueva | Oficinas de Ecopetrol, Km 1 Vía Cacayal |
| | Guamal | Carrera 7 N° 16-9, Barrio Fundadores |
| | Puerto Gaitán | Calle 14 N° 9-17, Centro Empresarial Iguana de los Llanos - Local 01 |
| Norte de Santander | Villavicencio | Calle 15 N° 40-01, Centro Comercial y Empresarial Primavera Urbana Piso 1, Local 153 |
| | | Cúcuta |

| Departament | City | Address |
|-------------|-------------------------|---|
| | Tibú | Mateo - Autopista Internacional Km 1 |
| | | Zona Industrial Ecopetrol S.A., Campo Tibú Km 1 |
| Putumayo | Orito | Gerencia de Operaciones y Desarrollo Putumayo, Barrio Colombia |
| Risaralda | Dosquebradas | Avenida del Ferrocarril N° 17 – 12, Edificio Ópalo Piso 1 |
| Santander | Barrancabermeja | Gerencia Refinería Barrancabermeja, Oficinas del 25 de Agosto Bloque 3, Carrera 20 Calle 71 Esquina |
| | | Instituto Colombiano del Petróleo (ICP), Km 7 Vía Piedecuesta |
| | Corregimiento El Centro | Oficinas Generales de Ecopetrol, El Centro |

The Ecopetrol Citizen Participation Office has a management system for "PQRS" under the Political Constitution of Colombia and the Code of Administrative Procedure and Administrative Litigation, consisting of the following components:

A. Procedure for the management of the requests – PQRS:

It is a document that consolidates the normative and procedural framework that is applied in the organization for the care of the PQRS (petitions, complaints and resources), including the following aspects:

- Competent Officials to solve PQRS.
- Stages of the PQRS attention process.
- Opportunity to respond (Service Level Agreements - SLA).
- Characteristics of the PQRS Response.
- Notification of Responses to Petitioners.

- Other aspects to consider in the treatment of PQRS.
- Substantial aspects of the Right of Petition.
- Roles and responsibilities in the attention of PQRS.

B. Management System:

To facilitate the registration, attention and traceability of requests, Ecopetrol has an appropriate system that guarantees among other functionalities the following:

- Centralization and registration of the cases received in the different channels of care arranged as web form, emails, telephone attention, personalized attention and physical mail.
- Single consecutive assignment that identifies each PQRS received in the organization.
- Traceability of the attention given to each PQRS, leaving the record of the officials who carried out the care and the documentation related to each case.
- Alerts of assignments and deadlines to ensure the timely and adequate response of citizens' requests.
- Real-time reports and reports on case management.

C. Timely attention indicator:

In order to monitor and ensure that all PQRS submitted to Ecopetrol are attended in a timely manner, in addition to the daily control executed through the System, the Indicator of Timely Attention to Citizens is reported on a monthly basis.

5.5 Mechanisms for transparency and access to information

Ecopetrol is aware of the importance of timely disclosure of the main data of our economic, social and environmental activity and the most relevant facts of the companies that make up the Group. For this

reason, it makes available to all its stakeholders different schemes to achieve dissemination, as mentioned below:

5.5.1 Active transparency

The applicable information, according to law 1712 of 2014 and concerning the structure, procedures, services and operation of the entity, is published on the website of ECOPETROL. Access to open data, information on public procurement and all other provisions defined by the Online Government Strategy are also recorded. This information can be consulted in the section of "Nuestra Empresa, Reporte Anual de Sostenibilidad, Atención al Ciudadano y Contratistas".

5.5.2 Passive transparency

All information requirements resulting in the exercise of the Law on Transparency and Access to Public Information (Law 1712 of 2014) are handled through the channels of the Citizen Participation Office, as well as the system provided for that purpose, in which citizens' petitions are identified in the exercise of these regulations.

5.5.3 Information management tolos

All information about the Ecopetrol Documentary Management Program can be found in the citizen attention section of the www.ecopetrol.com.co website, with the name of "Tablas de Retención Documental". In this section, there are published those provisions applicable to Ecopetrol and related to the recording or inventory of information assets, the index of classified and reserved information, as well as the disclosure scheme.

5.5.4 Differential accessibility criteria

Ecopetrol understands the diversity of its stakeholders and that is why the company's website complies with the standards of use provided by the Government Online strategy. The website also applies accessibility standards that allow a better experience for people with some level of visual disability; among these features, the possibility of viewing the page in high contrast mode, among other functions, stands out.

5.5.5 Monitoring the access to public information

Ecopetrol keeps track of access to public information and keeps update information about: number of requests received, requests transferred to another institution, response time to each request and number of requests in which access to information was denied.

5.6 Additional initiatives

Letter of dignified treatment to citizens and interest groups of Ecopetrol S.A.

Ecopetrol S.A., is interested in providing a world-class service and with the purpose of responding in a timely and efficient manner to the requirements of citizens and interest groups of the Organization, in matters relating to our competence and consistent with the defense of human dignity and the effectiveness of the rights of individuals, as set out in the Political Constitution of

Colombia, The Code of Administrative Procedure and Administrative Disputes and the Law on Transparency and Access to National Public Information. The company undertake to recognize and guarantee the rights of citizens, as we know:

- To submit petitions in any of its forms, orally, in writing or by any other appropriate means and without the need for an attorney, as well as to obtain information and guidance on the requirements of the provisions in force for this purpose. These actions may be executed or promoted by any technological or electronic means available in the organization, even outside the hours of attention to the public.
- To know, except with express legal reservation, the status of any action or procedure and to obtain copies, at his expense, of the respective documents.
- Except by legal reservation, obtain information that is contained in the records and files of Ecopetrol in the terms provided by the Constitution and the laws.
- To obtain a timely and effective response to their requests within the deadlines established for this purpose.
- To be treated with respect and due consideration for the dignity of the human person.
- To receive special and preferential attention in the case of persons with disabilities, children, adolescents, pregnant women or older adults and in general persons in a state of helplessness or manifest weakness in accordance with article 13 of the Constitution.
- To demand the fulfillment of the responsibilities of the workers of Ecopetrol.
- Making submissions and providing documents or other evidence in any action

in which it has an interest, to have those documents assessed and taken into account by the organization when deciding moment and to inform the intervener of the outcome of its participation in the procedure.

- Anyone else who is recognized by the Constitution and the laws.

Ecopetrol workers work together to strengthen the relationship between citizens and the organization. We take care of receiving and managing each of your queries, requests, complaints, always oriented to provide answers within the time line established by law and our internal procedures. In order to comply with the foregoing, Ecopetrol makes available to you the channels of attention indicated in section 5.4 of this document, as well as social networks (Facebook and Twitter) and Channel of denunciations.