	<b>ETHICAL ISSUES MANAGEMENT PROCEDURE</b>		
	<b>INTERNAL OBJECTIVE VERIFICATION</b> <b>Ethics and Compliance Office</b>		
	<b>CODE</b> <b>VEI-P-001</b>	<b>DATE</b> <b>04/05/2015</b>	<b>Version: 2</b>

## 1. OBJECTIVE

Describe the Ethical Issues Management Procedure for Ecopetrol and its corporate group, to manage complaints, dilemmas or queries that are reported through the established channels that may be related to unethical behavior, to address, coordinate and report matters to the competent bodies or authorities, by ensuring the management of these bodies or authorities, through permanent monitoring and follow-up.

Define the guidelines to follow when an official or third party identifies situations that may eventually lead to behaviors that go against the principles and values of Ecopetrol and its business group or put at risk compliance with the rules that prevent fraud, conflict of interest, corruption, money laundering and financing of terrorism, including those that violate human rights, international regulations against corruption such as the Foreign Corrupt Practices Act (FCPA). Likewise, the procedure for responding to queries and ethical dilemmas.

## 2. GLOSSARY

**ECOPETROL S.A. case manager:** ECOPETROL S.A. officer in charge of managing the matters received by the channel operator, who is responsible for reviewing the information of the complaint, query or dilemma, and assigning a professional verifier according to the required specialty, following up on the configuration of the hypothesis and closing the case.

**Act of commitment:** Document through which the employee who has incurred in a behavior that violates the Code of Ethics, commits to comply with the principles and values established for Ecopetrol and its business group, in all actions and scenarios where he/she represents the Company.

**Service Level Agreements (SLA):** It is an agreement between a product/service supplier and the customer to set the product specifications and/or service conditions in terms of quality, time, cost, among others. The SLA is a mechanism that allows the interested parties to reach a consensus in terms of the expectations of the product/service, in aspects such as: response times, hourly availability, necessary documentation, assigned equipment, level of user satisfaction, among others.


Basically, SLAs establish the relationship between the parties: supplier and customer of the product/service. An SLA identifies and defines the customer's needs while controlling their service expectations in relation to the supplier's capability, additionally provides a framework of understanding, simplifies complicated issues and reduces the differences between the areas.

**Issue:** Complaint, ethical dilemma or consultation made through the receiving channels enabled by Ecopetrol and its business group.

**Competent authority:** Any administrative or judicial body or entity that has competence to know or clarify the facts related to the complaint.

**Reception channels:** Channels enabled by Ecopetrol and its corporate group to receive complaints, queries and ethical or compliance dilemmas. Enabled channels are understood as the following: website, Iris and ethics hotline.

**Ethics and compliance cases:** Complaints that involve behaviors that constitute possible violations to the principles and values of Ecopetrol and its corporate group or put at risk the compliance with the rules related to fraud, conflict of interest, corruption, money laundering, financing of terrorism and matters related to any

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violation to the principles of human rights and international regulations against corruption such as the Foreign Corrupt Practices Act (FCPA).

**Impact cases:** These are those matters that are related to ethics and compliance typologies, where the reported party of Ecopetrol or its business group is: President, Vice Presidents, Members of the Board of Directors, Compliance Officer, Head of the Disciplinary Control Office, Director of Internal Audit, Head of the Ethics and Compliance Office, and the members of these teams.

Likewise, cases that are related to violations to the FCPA, or have a potential risk of materialization of fraud in the financial statements of Ecopetrol and its corporate group are considered impact cases.

These cases will be known by the Audit Committee of ECOPETROL S.A.'s Board of Directors.

**Consultation:** Question related to the proper interpretation and application of a rule or procedure, related to the prevention of Fraud, corruption, Money Laundering and Financing of Terrorism, FCPA or restrictive lists, real estate, and land issues, by suppliers, contractors, partners, or employees, among others.

**Individual conversation:** Conversation held by the verifier of the matter with an official of Ecopetrol and its business group, who has incurred in a behavior that violates the Code of Ethics, to generate a space for reflection and awareness, about the behavior that the organization expects from its employees.


**Whistleblowing:** Mechanism through which any person communicates, through the enabled reception channels, the facts or inappropriate behaviors that constitute a violation of the Code of Ethics, Human Rights, non-compliance with national or international standards that prevent fraud, conflict of interest, corruption, FCPA cases, money laundering, financing of terrorism, issues related to any violation of Human Rights and international regulations regarding any of these behaviors.

**Human rights:** Those faculties, prerogatives, and fundamental freedoms inherent to human beings and characterized by being irrevocable, inalienable, non-transferable and non-renounceable, whose effective exercise is indispensable for the integral development of the individual. All those behaviors that go against these rights and that are recognized in the Political Constitution of Colombia, in the laws and in the international conventions.

**Ethical dilemmas:** Doubts or concerns that any person may have, about the best option to proceed, in real or apparent situations, according to the Code of Ethics and all guidelines and procedures that regulate the behavior of Ecopetrol's officers and its corporate group such as those related to fraud, conflict of interest, corruption, FCPA cases, money laundering, financing of terrorism and matters related to any violation of Human Rights, use of privileged information, handling of gifts, hospitality and/or courtesies (See Guide for handling gifts and hospitality ECP-UEG-G-001, and Instructions for Conflicts of Interest, Disqualifications, incompatibilities and Prohibitions ECP-SEG-1-003).

**Analysis team:** Group of ECOPETROL S.A. and its Business Group officials or third parties hired by them, in charge of analyzing and managing the complaints received through the receiving channels. In general, it is determined depending on the specialty required in each case.

**First level officials:** Officials of Ecopetrol and its corporate group, whom given to the role and function they perform, the complaints, dilemmas and consultations which involve them must be known by a competent official at a higher level or by whom that higher lever officer delegates.

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**Case management tool:** Application software accessed through the web page, which receives, consolidates and records the management of all complaints, ethical dilemmas and/or queries received by the channel operator and stores all the information collected in the verification process.

**Hypothesis:** Question that assumes a certain degree of possibility of the occurrence or non-occurrence of a fact. Its confirmation depends on the study of verifiable evidence.

**Competent authority and/or body for handling complaints, dilemmas or queries:** area or body to which the complaint, dilemma or query is transferred because it is a matter within its competence.

The competent instances that act in the Management of Ethics and Compliance matters in Ecopetrol and its corporate group are: Audit Committee of the Board of Directors, Ethics and Compliance Officer, ad hoc Ethics and Compliance Officer, Group Ethics and Compliance Officers, Head of the Ethics and Compliance Office or whoever is acting in the group, Ethics and Compliance Management Team and the Analysis Team.

**Ad hoc Ethics and Compliance Officer:** first level management officer, to be appointed by the Chairman of the Audit Committee of the Board of Directors, temporarily in charge of managing matters involving a member of the Audit Committee of the Board of Directors, the Ethics and Compliance Officer, the Head of the Ethics and Compliance Office or a member of the Ethics and Compliance Office of ECOPETROL S.A. team.

**ECOPETROL S.A. Ethics and Compliance Officer:** Official responsible for overseeing the design, implementation and supervision of the proper functioning of the System of Prevention, Detection and Mitigation of the Risks of fraud, corruption, FCPA, conflict of interest, money laundering or terrorist financing in compliance with national and international regulations in Ecopetrol and its business group.

**Corporate Group Ethics and Compliance Officer:** Official within each Company of the Business Group, responsible for the monitoring, design, implementation and supervision of the proper functioning of the system of prevention, detection and mitigation of the risks of fraud, corruption, FCPA, conflict of interest, money laundering or financing of terrorism with respect to compliance with national and international regulations in Ecopetrol and its business group.


FCPA cases, conflict of interest, money laundering and financing of terrorism as well as compliance with national and international regulations on related issues.

**Channel Operator:** Independent third party that manages the reception channels enabled by ECOPETROL S.A. to receive complaints, ethical dilemmas and/or consultations.

**Principles:** Description of the ethical behavior expected from each of the employees in the development of activities both inside and outside the Company.

**Recommendation to the processes:** Action derived from the verification of a case in which warning signs are identified and as prevention a recommendation is sent to the respective area. The follow-up for compliance is done by the Ethics and Compliance Office (See Guide for the definition and monitoring of action plans UEC-UEC-G-001).

**Response time:** Maximum period of time that must elapse between the receipt of the complaint, inquiry or dilemma through the receiving channels, until the closing of the case (including the recommendation if applicable) or response to the dilemma or inquiry.

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Impact cases or with FCPA typology: Ninety (90) working days \*; Compliance cases: Seventy (70) working days \*; Compliance cases: Seventy (70) working days \*; Compliance cases: Seventy (70) working days \*. (70) working days; Ethics cases: Fifty-five (55) working days; Dilemmas and consultations: eight (8) working days.

\*An extension may be requested in writing with the authorization of the competent officer in which the days in which the case is extended must be established.

The first extension shall be authorized by the Detection Leader and the second, exceptionally, shall be authorized by the Head of the Ethics and Compliance Office. In the case of cases where the verifier is the Detection Leader, the extensions shall be signed by the Head of the Ethics and Compliance Office.

**Typology:** It is the description of an inappropriate conduct of an official of Ecopetrol or its corporate group, related to the violation of rules for the prevention of fraud, conflict of interest, corruption, bribery, money laundering, financing of terrorism and matters related to any violation of human rights, and international regulations such as the Foreign Corrupt Practices Act FCPA, whose realization will give application to the consequences provided in this procedure.

**Values:** desirable ways of being and acting of people, which enable the construction of coexistence for the achievement of the Company's challenges and are manifested in behaviors.

**Verifier of issues:** An official of ECOPETROL S.A., its Business Group or a third party, who analyzes, manages and responds to complaints, queries or dilemmas received through the receiving channels.

### 3. GENERAL CONDITIONS

#### 3.1. Principles for the management of complaints, ethical dilemmas and queries:

**Transparency:** the user and/or complainant must know, comply with the procedures and use the channels to make complaints, dilemmas and raise their queries.

**Independence:** All matters must be received through the authorized channel, which is handled by a third party independent from Ecopetrol and its corporate group.


**Anonymous reporting:** It is a right that the user and/or whistleblower has to request that his/her complaint, ethical dilemma or consultation be processed anonymously and both the reception channel and the different instances of the process must ensure that anonymity.

**Confidentiality:** All ethics and compliance matters must be handled in a confidential and reserved manner.

**Good faith:** Any complaint, dilemma or consultation must be made in good faith, by the complainant or user, not issuing unsubstantiated value judgments, respecting the fundamental rights to privacy and the good name of individuals.

**Whistleblower protection:** No retaliation of any kind will be tolerated against people who make use of the channels provided to receive complaints, dilemmas and queries, and the Company will take the corresponding legal measures against anyone who violates this principle.

If a whistleblower and/or external user approaches an official of Ecopetrol and its business group with the purpose of presenting a complaint, dilemma or ethical and compliance consultation, he/she must inform


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him/her of the appropriate channels for this purpose and encourage him/her to make use of them, since these are the only authorized means to process the matters brought to his/her attention.

### **3.2 Roles and responsibilities in the process of handling complaints, queries and ethical dilemmas.**


For the purposes of the application of this procedure, the roles and responsibilities of the bodies and persons involved in the Ethical and Compliance Issues Management Procedure in ECOPETROL S.A. and its Business Group must be considered:

<b>Role</b>	<b>Responsibility in the management of ethics and compliance issues</b>
Ethics Committee	Recommend actions to strengthen the ethical environment of the organization and the Ethics and Compliance program of ECOPETROL S.A. and its Business Group.
Chairman of the Audit Committee of the Board of Directors	1.- To bring to the attention of the Audit Committee of the Board of Directors the matters received that are within the competence of that Committee, in accordance with the delegation for the attention of Ethical and Compliance Matters. 2.- To ensure the management of the verification of the cases that are within their competence.
Audit Committee of the Board of Directors	1.- To process and manage impact cases, including those that violate international anti-corruption standards (FCPA) and related regulations. 2.- To ensure the management of the verification of the cases that are within their competence.
Ethics and Compliance Officer of Ecopetrol S.A.	1.- To process and manage the matters assigned to him/her. 2.- Assign one or more officers to form an analysis team or a third party as verifiers of the matter. 3.- Report on a monthly basis to the Audit Committee of the Board of Directors, the management of ethics and compliance matters received and processed during the respective period. 4.- Designate to whom corresponds the attention of the cases that are within its competence.
Ethics and Compliance Officer of the companies of the corporate group.	1.- To process and manage the matters assigned to him/her. 2.- Assign one or more officers to form an analysis team or a third party as verifiers of the matter. 3.- Report on a monthly basis to the Head of the Ethics and Compliance Office of Ecopetrol, the management of ethics and compliance matters received and processed during the respective period.
Ad hoc Ethics & Compliance Officer	1.- To process and manage the matters assigned to it. 2.- To handle cases of inappropriate behavior of the Ethics and Compliance Officer of ECOPETROL S.A. members of the Audit Committee of the Board of Directors.  Paragraph: This function may be assumed by the Financial Vice-President, the Legal Vice-President or the Internal Audit Director and shall be appointed by the Chairman of the Audit Committee of the Board of Directors.
Chief of the Office of Ethics and Compliance	1.- To process and manage the matters assigned to him/her. 2.- To integrate the required verification teams. 3.- Report on a half monthly basis to the Ethics and Compliance Officer of

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	<p>ECOPETROL S.A., the matters received and processed during the respective period.</p> <p>4.- Sign the extensions of its competence.</p>
Ethics and Compliance Office Detection Leader	<p>1.- To process and manage the matters assigned by the Ethics and Compliance Officer of ECOPETROL S.A., and the Head of the Ethics and Compliance Office.</p> <p>2.- Report on a weekly basis to the Chief of the Ethics and Compliance Office of ECOPETROL S.A., the impact matters received and processed during the respective period.</p> <p>3.- Ensure the processing and attention of the cases brought to the attention of the Ethics and Compliance Office.</p> <p>4. - To sign the extensions of its competence.</p>
Case Manager	<p>1.- To process and manage the matters received through the channels enabled for the reception of complaints.</p> <p>2.- Perform the previous analysis and assign the cases that are filed in the tool to the case verifiers according to the competence by the position of the related official and the typology.</p> <p>3.- Process the matters received through the receiving channels that do not fall under the competence of the Ethics and Compliance Office and transfer the matters for the pertinent purposes.</p> <p>4.- To perform the required reports.</p> <p>5.- Report to the Head of the Ethics and Compliance Office and to whomever he/she may require all matters of impact received through the tool and the progress in the verification of the same.</p> <p>6.- Make a weekly report to the Head of the Ethics and Compliance Office on the status of the cases handled.</p> <p>7.- Alert on the expiration of terms of the cases assigned to the case verifiers and ensure compliance with them.</p> <p>8.- Submit monthly statistical reports on the matters received and processed, as well as the issues received, and recurring issues detected.</p> <p>9.- To transfer the complaints received to the Human Rights Committee, the complaints received and related to human rights violations, in which the hypothesis has been configured.</p> <p>10.- Transfer the complaints received under the competence of the Citizen Participation Office and communicate to the petitioner the respective filing, through the tool, by mail or correspondence.</p> <p>11.- In the rights of petition handled or forwarded by the Office of Citizen Participation, immediately inform the petitioner about the application of the procedure for the management of ethical issues and the term in which the response will be provided.</p> <p>12.- At the request of the verifiers, close the cases in the Tool.</p>
Verifier of issues	<p>1.- To process and manage the matters assigned to him/her.</p> <p>2.- To report at the systematic screening meeting of the Ethics and Compliance Office of ECOPETROL S.A. on the matters received and processed during the respective period.</p> <p>3.- Deliver to the monitoring professionals all the information related to recommendations, improvement actions and transfers to the competent authority for monitoring and follow-up once the assigned case is closed. (See Guide for the definition and monitoring of action plans UEC-UEC-G-001).</p>



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	4- Enter in the tool the information required for case closure and request closure to the Case Manager.
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## 4. DEVELOPMENT

### 4.1 Receipt of complaints, ethical dilemmas and queries

Ecopetrol and its business group have set up a channel for the reception of complaints, consultations, and ethical dilemmas, in order to guarantee confidentiality and anonymity in the attention of matters brought to their attention through the National and International telephone line and the link of the Web page or iris.


### 4.2 Criteria for determining the assignment of the management of complaints, queries and ethical dilemmas

For the purposes of initiating the management of complaints, and assigning the verifier of the matter, the following must be considered:

#### 4.2.1. Officer involved in the complaint or dilemma.

The channel operator must evaluate the information received and make a pre-classification of the type of complaint received, according to the established classification. For the assignment of management, the position and level of the official involved shall be contemplated, and his or her competence shall be defined accordingly:


Competent Body	Competence for the assignment and management of the report	Typology
Chairman of the Board of Directors	Process and manage directly or through the teams or persons designated for the analysis, the ethical or compliance complaints, related to or involving: <ul style="list-style-type: none"> <li>- Chairman of the Audit Committee of the Board of Directors.</li> <li>- Members of the Audit Committee of the Board of Directors.</li> </ul>	Inappropriate behaviors regarding Fraud, Corruption, FCPA violations.
Audit Committee of the Board of Directors	Process and manage directly or through the teams or persons designated for the analysis, the ethical and compliance complaints, where top level officials of Ecopetrol and its Business Group are involved, as well as: <ul style="list-style-type: none"> <li>- The Ethics and Compliance Officer of ECOPETROL S.A. (For this case the President of the Committee, appoints an</li> </ul>	Inappropriate behaviors regarding Fraud, Corruption, FCPA violations.

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	Ethics and Compliance Officer Ad Hoc to attend the case). - Director of Internal Audit - Head of the Disciplinary Control Office - Head of the Ethics and Compliance Office of ECOPETROL S.A. and its officers.	
Ethics and Compliance Officer of ECOPETROL S.A.	Process and manage directly or through the teams or persons designated for the analysis, the Ethical or compliance complaints where Ethics and Compliance Officer of the corporate group are involved.	Inappropriate behaviors that violate business ethical values and those related to Fraud, Corruption, FCPA, LA/FT
Ethics and Compliance Officer of the corporate group	Process and manage directly or through the teams or persons designated to analyze or persons designated for the analysis, the Ethical or compliance reports or complaints, related to employees who are not first level of the Group and those assigned to them.	Inappropriate behaviors that violate business ethical values and those related to Fraud, Corruption, FCPA, LA/FT
Head of the Ethics and Compliance Office	Process and manage directly or through the teams or persons designated for the analysis, the Ethical or Compliance complaints, related to:  ECOPETROL S.A. employees, who are not first level, nor of the Ethics and Compliance Office and those assigned to it.	Inappropriate behavior that violate business ethical values and those related to Fraud, Corruption, FCPA, LA/ET.  Those designated by the Audit Committee of the Board of Directors and the Ethics and Compliance Officer.

**Paragraph:** If a complaint associated with Fraud, Corruption, FCPA, Money Laundering or Financing of Terrorism, which does not involve a first level officer and situations or alerts for alteration of financial statements are identified, it shall be sent directly to the Chairman of the Audit Committee of the Board of Directors with a copy to the Ethics and Compliance Officer of ECOPETROL S.A. If the complaint involves the Ethics and Compliance Officer, the Head of the Ethics and Compliance Office or a member of his team, it shall be sent only to the Chairman of the Audit Committee of the Board of Directors.



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The Chairman of the Audit Committee of the Board of Directors must notify the members of the committee of the allegations received in order to designate the team or officer to analyze the allegation. Once the matter has been verified by the designated officer or team, it will present its conclusions and recommendations to the committee, based on which the Committee will formulate recommendations to determine the actions to be taken and the closure of the case.

#### **4.2.1.1 Ethical Dilemmas and Consultations**

These will be referred by the channel operator to the case manager, who will assign the Ethics and Compliance Office team and the group's compliance officers for management and response.

If the dilemma comes from a member of the Board of Directors, a first level management officer, a member of the Steering Committee, the Internal Audit Director, the Head of the Disciplinary Control Office, a member of the Ethics and Compliance Office team of Ecopetrol, Ethics and Compliance Officers of the Group, it will be referred by the channel operator to the Ethics and Compliance Officer of ECOPETROL S.A. who may designate the Head of the Ethics and Compliance Office for its management. If it comes from the Ethics and Compliance Officer of ECOPETROL S.A. and the Head of the Ethics and Compliance Office, it shall be sent directly to the Chairman of the Audit Committee of the Board of Directors, who may designate the ad-hoc Ethics and Compliance Officer for its response.

Once the analysis has been carried out by the designated officer, his/her conclusions shall be presented to the Ethics and Compliance Officer or to the Chairman of the Audit Committee of the Board of Directors, and based on these conclusions, a response shall be given and the matter shall be closed.


**Paragraph:** For the attention of dilemmas and/or consultations, as well as for the determination of inabilities, incompatibilities and/or legal prohibitions, the Ethics and Compliance Office shall support and request advice from the Legal Vice-Presidency of ECOPETROL S.A. and the Vice-Presidency of Human Resources, according to their competence, so that the Ethics and Compliance Office can respond to the applicant.

Such support shall be defined in the previously established service level agreements.

#### **4.3.1.2 Matters that are received through the receiving channels and do not fall under the competence of the Ethics and Compliance Office**

Information that does not constitute a complaint, dilemma or consultation that does not correspond to typologies determined by Ecopetrol and its business group, the communication will be transferred by the Case Manager to the areas in charge of the process, in accordance with the following table:


<b>Topic</b>	<b>Situation</b>	<b>Area to be transferred</b>
Contractual Issues	Complaints related to the contractual process Rights of petition Disputes in the pre-contractual and contractual stage of the contracting process Inconformity in the selection stage of the contractor or supplier Non-conformity in the awarding of the contract Nonconformity at the contract execution stage Non-conformity in the performance evaluation stage of the supplier or contractor	Shared Services Director / Legal Vice-Presidency  Director of Shared Services / Legal Vice-Presidency

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	<p>Non-conformity at the contract liquidation stage.</p> <p>Disparity of technical or legal criteria of the contract.</p> <p>Outstanding payments of salaries and social benefits by the contractor to its workers.</p> <p>Contractor's outstanding salary and social benefits payments to its employees</p> <p>Delay in the payment of parafiscal contributions by the contractor.</p> <p>Delay in the payment of contributions to the General System of Social Security</p> <p>Social Security System (health, professional risks and pensions) by the contractor.</p> <p>Delay in the payment of severance and interest on severance payments to the Severance Pay Fund by the contractor.</p> <p>Complaint related to easements and real estate management.</p>	<p>Director of Labor Relations - Labor Obligations Assurance Unit</p>
Labor Harassment Issues	Labor Harassment	Coexistence Committee
Labor issues	<p>Administrative complaints</p> <p>Rights of petition</p> <p>Requests for reimbursement</p> <p>Dissatisfaction with the settlement of salaries and social rights of ECOPETROL S.A. employees.</p> <p>Inconformity with the settlement of the pension allowance of the retirees of ECOPETROL S.A.</p> <p>Request for recognition of benefits</p>	Vice-Presidency of Human Resources - Labor Relations Division
Health issues	<p>Dissatisfaction with the provision of health care services</p> <p>Dissatisfaction with the medicines established in the Health Plan of ECOPETROL S.A.</p> <p>Non-conformity with regard to health care professionals assigned to the health care service</p>	Vice-Presidency of Sustainable and Environmental Development
HSE	<p>Dissatisfaction with the hiring of personnel for not giving priority to the community</p> <p>Dissatisfaction with social investment in the regions.</p> <p>Claims due to spills or environmental contamination.</p> <p>Damages caused by hydrocarbon spills involving ECOPETROL S.A.</p> <p>Improper allocation of resources</p>	Vice-Presidency of Sustainable and Environmental Development
Behaviors of third parties	All matters related to situations involving complaints against Contractors and Subcontractors	Services Management Shared Services
Others	<p>Domestic violence</p> <p>Abandonment of alimony</p> <p>Extra-marital relationships</p>	Competent authority

#### 4.2.1.3 Assignment of the ethical dilemma or issue analysis team or verifier

The analysis team may be made up of members of the Ethics and Compliance Office of ECOPETROL S.A. or whoever takes its place in the Group, officials from other areas of Ecopetrol and its corporate group, Ethics and Compliance Officers of the Group or an independent third party (external advisors or consultants). The

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team shall be formed according to the typology, the specialty that the matter requires, and the organizational level of the person involved.

#### 4.2.2 Typologies of ethical and compliance complaints

The following is a description of behaviors that go against the ethical principles and values of Ecopetrol or its Business Group.


##### 4.2.2.1 Behaviors associated with ethical typologies

<b>Ethical tipologies</b>	<b>Description</b>
Discrimination	Statements or decisions about people, hiring, selection, development, and promotion of employees, based on criteria other than merit, meaning factors such as age, color, race, origin, nationality, sexual orientation, gender, civil condition, disability, religion, recruitment condition or type of payroll.
Sexual harrasment	Statements or actions that express sexual undesirable and inappropriate approximations, requests for sexual favors, unwelcome insinuations of sexual character, physical contact not accepted, constant hints of sexual character, verbal or visual expressions of sexual nature.
Intimidation, retaliation or revenge	Statements or actions performed to degrade, or to retaliate a person that do not access to the pretensions from his superior or from any person that want to obligate it to decide or act.
Hostile Environment	Statements or actions that deteriorate the labor ambient, such as behaviors or statements that can be qualified as offensive, intimidating, malicious or insulting. To force or to participate in inappropriate work practices for the worker to fit into the ECOPETROL environment.
Unfair job practices	Decisions or actions taken by the hierarchical authority without considering the conditions of the work, organizational changes that generate overwork or pressure caused for the business goals.
Unsafe or unhealthy practices in work	Practices or actions that violate the rules, regulations, or laws in detriment of the health or the safety or that can impact the environment, the health or the safety of the employee or any group of interest.
Abuse of substances	The use, possession, sale, distribution, concealment or transportation of illegal drugs, narcotics, alcoholic beverages, or any psychoactive substance in the facilities of the company, or being under the effects of any of them during the development of the labors or when acting in representation of ECOPETROL S.A.
Physical threats and violence	Threatening statements or actions that can be considered as acts of violence. Bearing of weapons, such as short sharp, fire, rifles, ammunition or explosives in the work place, or during the development of the labors or in representation of ECOPETROL SA
Disrespect or mistreatment	Form of physical or psychic assault with the use of verbal or attitudinal language, with rude actions, or attacking the dignity and integrity of the person.
Breach of rules and procedures	All acts or omissions that generate the breach of rules contained in the constitutional, legal or normative framework, or procedures established internally either externally.
Breach of citizen obligations	Every act or omission that generate the breach of citizen obligations, such as lack of credits payment, loans, alimentary obligations, or any other breach.
Other inappropriate behaviors	Those behaviors that do not fall under the typologies described but that could generate a behavior that results in a breach of the Code of Ethics.

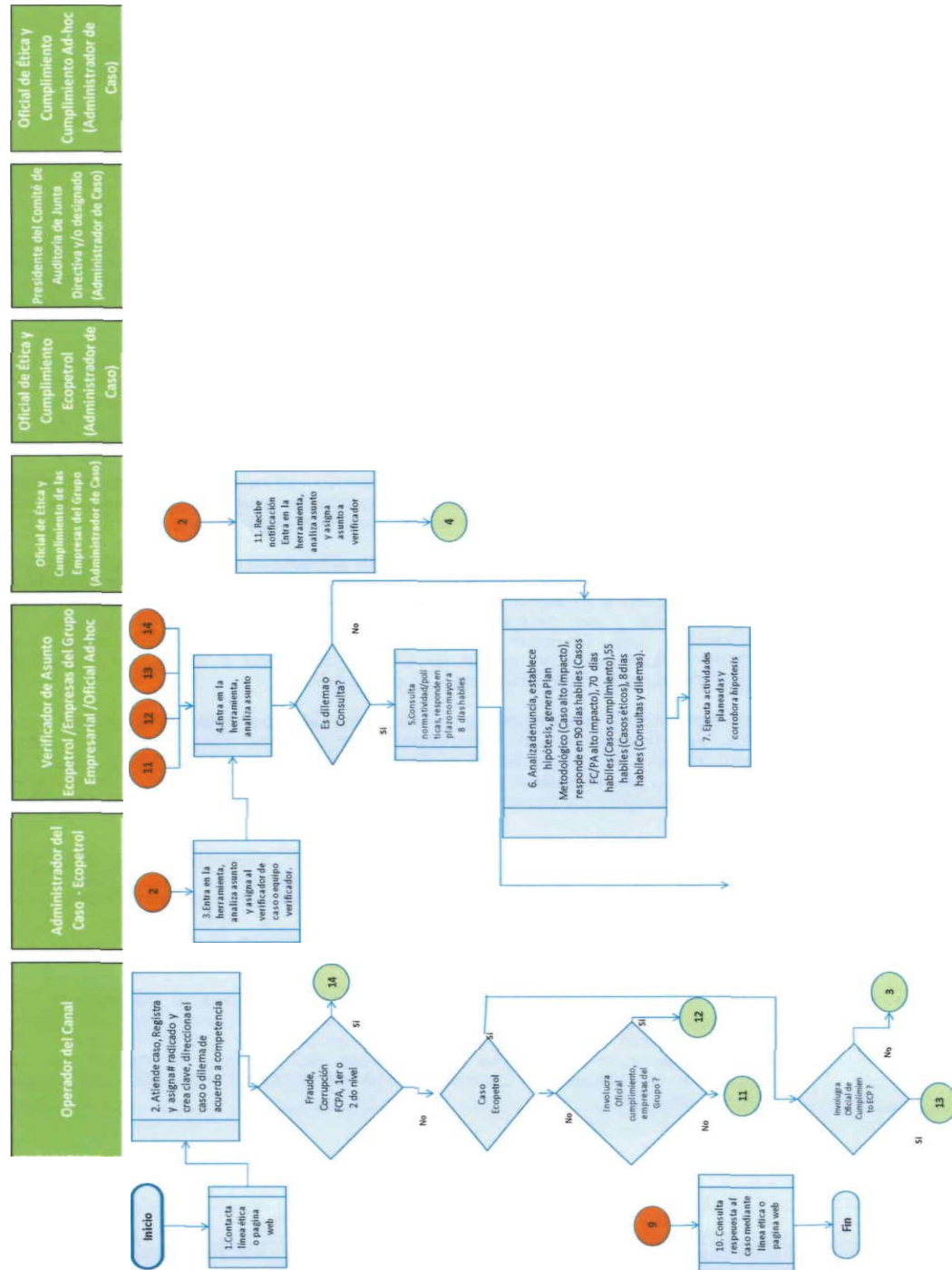
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#### **4.2.2.2 Behaviors associated with Compliance typologies (Fraud, Corruption, FCPA, Money Laundering and Terrorist Financing)**

The compliance typologies are listed in the Anti-Corruption Manual ECP-UEC-M- 002, (FCPA corruption typologies), Anti-Fraud Manual ECP-UEC-PI-003 (Fraud typologies), Manual for the management of risks of Money Laundering (ML) and Financing of Terrorism (FT) ECP-UEC-M-001 (ML/FT typologies).

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## FLOW CHART MANAGEMENT OF ETHICAL ISSUES




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#### 4.3. Description of the management of queries, ethical dilemmas and inquiries

Step	Responsible	What he/she do/does	Register
	Complainant or interested	Who fill a complaint, consult or present a dilemma through the receiving channels (telephone national and international line, web page or Iris)	
	Channel Operator	<p>Receives the issue through the authorized media and makes interview to the complainant to obtain the necessary information. Register the case, regardless of whether the complainant identifies himself or prefers to be in the anonymity (including the utilization from an alias).</p> <p>When the interview has finished, the system assigns a number of filing and the complainant can create an access code , the number settled is delivered to the complainant as unique mechanism to follow-up the affair.</p> <p>Once the matter has been dealt with, the operator directs it according to the roles and responsibilities within the process of management of complaints and ethical dilemmas (Numeral 4.3)</p> <p>Analyze the information obtained. If the complaint contains elements that may constitute a breach of international anti- corruption standards or the person involved is from the first management level of Ecopetrol and its business group, the complaint is assigned to the Chair of the Audit Committee of the Board of Directives of ECOPETROL SA, with a copy to the Ethics and Compliance Officer of ECOPETROL SA. Continue with the step 14.</p> <p>If the complaint: does not contain elements of typologies associated with FCPA, does not involve a first level management official, does not involve the Ethics and Compliance Officer of ECOPETROL SA and the related facts correspond to ECOPETROL SA, is assigned to the administrator of cases from ECOPETROL SA Continue with the step 3.</p> <p>If the related facts do not contain elements of fraud, typologies associates with FCPA, do not involve an official of first either second level managerial, does not involve the Compliance Officer of the Business Group, and the acts are related to Group companies, the case is assigned to the Compliance Officer of the Business Group. Continue with the step 11.</p> <p>If the related facts do not contain elements of fraud or corporate corruption, do not involve an official of the first or second management level, but they do involve the Ethics Officer and Compliance or the analysis team of the Group, the complaint is assigned to the Official from Compliance from ECOPETROL SA. Continue with the step 12.</p>	<p>Complaint / dilemma /query</p> <p>Number from filing fromaffair</p>




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3	Management of the Case	<p>Enter the tool with your username and password, analyze the case information and assigns it to the issue verifier according to their responsibilities and skills, or transfer or give response in case it is not a matter of competence of the Office of Ethics and Compliance.</p> <p>Proceeds to assign one or several officials for case, until conforming an equipment enough accordingly to the complexity of the complaint.</p> <p>Note: The administrator of the case can act as verifier of the issue.</p>	<p>E-mail notification to the administrator of case received or the receiving channels.</p> <p>E-mail for assignment of the case to a person or group of verifiers of the case.</p>
4	Verifier of the issue	<p>Receives the assignment via electronic mail (automatic notification of the system)</p> <p>Access the tool with his username and password and consult the assigned issue.</p> <p>If the affair assigned is a dilemma or a query, please refer to step 5.</p> <p>Yes the affair assigned is a complaint, keep going with him He passed 6.</p>	E-mail notification of affair to the verifier
5	Verifier of the issue	Respond the dilemma or query in a period not superior to eight (8) days calendar. The answer must be fund in a) the current and applicable norms, b) corporate position or c) history of responses issued to similar and comparable cases.	Record of the answer in the tool
6	Verifier of the issue	Respond the impact cases, either with typology FCPA in a period of Ninety (90) working days; compliance cases in seventy (70) working days, Ethical cases in Fifty - five (55) business days, in all cases a duly authorized request of an extension up to the necessary term may be filled. Analyze the information provided in the complaint (interview, web form, documents, etc.), raises a hypothesis and establishes a methodological plan in impact cases, which considers the planning of the necessary activities and if necessary the case will be assigned to the support consultant.	Record of the activities made in the tool, and exhibit of supporting documents.
7	Verifier of the issue	<p>Perform the activities planned according to the methodological plan (interviews, requests and achievement of documents, among others)</p> <p>At the end of the activities planned, either any exercise required, the case verifier determines whether or not the hypothesis raised would be corroborate.</p> <p>At any time, from the analysis of the documentation and performance from activities, the verifier can add hypothesis.</p>	Register of the activities made in the tool, and exhibit of supporting documents

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8	Verifier of the issue	<p>If considered necessary, can elaborate a memorandum of recommendations to the competent, to avoid the recurrence on the acts, or the improvement of the internal control system of Ecopetrol and its business group, which shall be sent to the front from monitoring for his follow-up.</p> <p>If considered necessary, the case is forwarded to the Office of Disciplinary Control, Office of the Attorney General of the Nation or control entity.</p> <p>Burden in the tool every documents collected, analyzed and elaborated in the development of the verifications that support the conclusions and fields required in the platform of the channel operator.</p> <p>Respond to the complainant or interested and access it in the system.</p>	<p>Documents collected</p> <p>Upgrade from the tool</p> <p>Memorandum of recommendations</p> <p>Reply to the complainant or interested.</p>
9	Administrator of the case / Person Competent according to the matrix of typification	Check out the information charged in the system, check the reply to the complainant and close the case in the system.	<p>Approve the response and reply it to the complainant through the platform.</p> <p>Extension form</p>
10	Complainant or Interested	<p>Consult through the Web page the reply to the complaint, query or dilemma, in accordance to the terms established entering the file number of the matter and the password, in case the complainant cannot access the response due to loss of the key will be transferred to the answer through the mail of the OEC.</p> <p>No emails or communications are generated to the accused to notify the result of the complaint, because the principle of the complaint is to preserve the anonymity of the complainant. For that reason there is not interlocution or contact different from the complaints tool.</p>	Record in the tool
11	Ethics and Compliance Officer of the business group.	<p>Receives e - mail notification of the assigned case.</p> <p>Enter the tool with your username and password, analyze the information of the case and assigns it to the case verifier according to with their responsibilities and skills.</p> <p>The Ethics and Compliance Officer of the business group may assign one or several verifiers per case, until forming a sufficient team according to the complexity and volume of the complaint, assuming a role of administrator of case assigned.</p> <p>Continue with step Four.</p>	<p>E-Mail notification to the Ethics and Compliance Officer of the group, of the new case received.</p> <p>Email of allocation of case to person or group of verifiers.</p>

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12	Ethics and Compliance Officer of Ecopetrol SA	<p>Receives e-mail notification of the assigned case.</p> <p>Enter the tool with its username and password, analyze the information of the case and assigns it to the case verifier according with their responsibilities and skills. One or several officials can be assigned per case, until forming a sufficient team according to the complexity of the complaint, assuming a role of administrator of the assigned case.</p> <p>Continue with step 4.</p>	<p>Email notification to the Ethics and Compliance Officer of Ecopetrol SA of the new case received</p> <p>E- Mail assignment _ of the case to a person or group of verifiers.</p>
13	Chair the of Committee Audit from the board of directors, or designated person.	<p>Receives notification by electronic mail, of the case assigned.</p> <p>The Chairman of the Audit Committee of the Board of Directors enters the tool with its username and password, analyzes the information of the case and reports it to the Audit Committee.</p> <p>According to the provisions of the Audit Committee of the Board of Directors, assigns to a verifier of issues or an internal or external team of analyzers</p> <p>Continue with step 4.</p>	<p>Email notification to the Chairman of the Audit Committee of the Board of Directors or the designated person.</p>
14	Ad- hoc Ethics and Compliance Officer	<p>Receives notification of the assigned case by electronic mail.</p> <p>The Ad - Hoc Ethics and Compliance Officer enters the tool with its username and password, analyzes the information of the matter and assign it to the case verifier, according to their responsibilities and skills.</p> <p>The Ad- hoc Ethics and Compliance Officer have the role of administrator of the case in the tool and continue with step 4.</p>	<p>Email notification to the Ad- hoc Ethics and Compliance Officer</p>

#### 4.4 Response times for complaints, dilemmas and queries


The response times defined for handling complaints, dilemmas and queries are as follows:

##### Impact cases and/or FCPA typologies:

Ninety (90) working days, which may be extended for the required term with the prior written authorization of the Head of the Ethics and Compliance Office.

##### Compliance Cases:

Seventy (70) working days, which may be extended for the required term upon authorization of the ECOPETROL S.A. Detection Leader in the first extension, if they are cases verified by the Detection leader the respective extensions will be authorized by the head of the Ethics and Compliance Office.

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#### **Ethical cases:**

Fifty-five (55) working days, which may be extended for the required term upon authorization of the ECOPETROL S.A. Detection Leader in the first extension.

#### **Dilemmas and queries:**

Eight (8) working days, which may be extended for the required term upon authorization of the ECOPETROL S.A. Detection Leader.

**Paragraph:** In all cases, if a second extension is required, it may only be authorized by the Head of the Ethics and Compliance Office.

#### **4.5 Forms of Closure for ethics and compliance complaints**

Once the case verifier has completed the process, in which the hypothesis is corroborated, he/she shall present his/her conclusions and recommendations to the case manager or the competent official to request the closure of the case:

Closure of the case
Individual Conversation with the person that presented the inadequate behavior by the professional designated by the Chief of the Office of Ethics and Compliance.
Subscription of minutes of commitment in ethical cases.
Workshop for strengthening ethical principles and values.
Transfer to the competent instance (Legal Vice presidency, Human Talent Vice Presidency, Internal Audit, Control Disciplinary Office, among others).
Transfer to the competent authority (Prosecutor's Office, Comptroller, Ordinary Justice, among others), if situations that must be investigated by such authorities are found.
Transfer to the Human Rights Committee of ECOPETROL SA, when related with human rights typologies.


If warning signs have been identified and lead to an action plan directed to a unit in charge of its implementation, the Action Plan is prepared together with the Monitoring team and will be transferred to the Monitoring group of the Ethics and Compliance Office for the respective follow-up of its compliance. (Refer to the Guide for the definition and monitoring of action plans derived from the complaints process UEC-UEC-G-001).

#### **4.6 Consequences derived from the analysis of the complaints.**

The consequences may be:

- Individual conversation with the denounced person.
- Signing of a commitment act.
- Initiation of Disciplinary Investigations
- Initiation of investigations by the competent authorities.
- Others that may be established.

**Paragraph:** If it becomes evident that a whistleblower has been subjected to retaliation for having reported an incident to the Ethics and Compliance Office, the employee will be subject to the appropriate administrative actions and the competent department will be notified.

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#### 4.7 Handling of retaliatory complaints

When the reported employee signs for the second time a commitment report for the same behavior, the copy of the report indicating such situation shall be brought to the attention of the Disciplinary Control Office for the purposes that may be appropriate according to its competence, always keeping the confidentiality of the complainant.


Likewise, such information shall be forwarded at the request of the Vice-Presidency of Human Resources.

**Paragraph:** When a person refuses to attend an individual conversation, to participate in a workshop on principles and values or to sign the commitment act, the situation shall be referred to the Vice President of Human Resources, so that in the development of its competence, decisions may be adopted according to the Internal Labor Regulations and the Substantive Labor Code.

#### 4.8 General rules for complaint management

- Confidentiality will be preserved in all cases; however, if the complainant or contacts direct their complaint with a copy to other employees or third parties, it is not possible to guarantee total confidentiality due to the level of involvement of the person who brings the facts or situations to their attention.
- During the interviews carried out for the purpose of verification, the complainants, contacts, officials or third parties may not attend with a lawyer, representative, other official or third party as companion or defender because it is a preventive procedure that does not contemplate the presence or accompaniment of third parties in the verification carried out, nor may the interview be recorded by any means.
- During the verification of typologies associated with compliance, the Ethics and Compliance Office is empowered to access the information contained in the corporate mail, in folders or files that are not classified by the user as personal, provided that express authorization is obtained from the employee for its recording, taking into account the following:
  - (i) The authorization must be based on the purpose and use of the corporate mail, as provided for in Ecopetrol's internal regulations in force.
  - (ii) Clearly expressing the purposes that Ecopetrol would have with the registration, without at any time the Company may exceed the specific purpose for which the registration is required, purpose that must be informed in each specific case (at the time of registration leaving a record of such warning the worker).
  - (iii) The registration parameters must be the same for all employees regardless of their position in the Company.
  - (iv) The records must be treated with the highest discretion towards third parties, in the sense that the practice of registration will be as discreet as possible and will guarantee the confidential treatment of the information obtained.
- Reprisals are not allowed for any reason and in case situations are identified, the competent authority will be informed under penalty of legal action.

**Paragraph:** In case of receiving a complaint related to FCPA (Foreign Corrupt Practices Act) typologies, it must be reported immediately to the Audit Committee of the Board of Directors with a copy to the Ethics and Compliance Officer, who will designate an officer, analysis team or third party, ensuring the suitability and independence of the team, preserving the legal privilege and ensuring the application of best practices for the management of such complaints in accordance with international practices.

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## 5. CONTINGENCIES

Not applicable

### LIST OF VERSIONS

Last version			
Version	Date	Code and title of the document	Changes
1	27/08/2012	ECP- SEG-P-009- Ethical Issues Management Procedure	Update of the document accordingly to changes in the Office of Ethics and Compliance. Repealed the Procedure Channel Operator, ECP- SEG- P- 012 and the Matrix of Ethical Behaviors.
New document			
Version	Date	Changes	
1	03/12/2014	Update of the procedure according to the changes in the processes of the Ethics and Compliance Office. Simplification of response times regarding queries, dilemmas, and consultations. Update of the code of the document due to the verification process.	
2	04/05/2015	Update of the procedure extending the terms of response queries, dilemmas, and consultations to working days.	

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<p><i>Document signed electronically, in accordance with the provisions of Decree 2364 of 2012, by means of which article 7 of Law 527 of 1999 is regulated, on the electronic signature and other provisions are issued. To verify compliance with this mechanism, the system generates an electronic report that shows the traceability of the review and approval actions by those responsible. If you need to verify this information, request the report from the Service Desk.</i></p>	