
	<b>Procedure for the Management of Ethics and Compliance Issues</b>		
	<b>Compliance Management System</b> <b>Corporate Compliance Management</b>		
	<b>CODE</b> <b>GEE-P-013</b>	<b>Drafted on</b> <b>02/14/2025</b>	<b>Version: 1</b>

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## 1. OBJECTIVE

The purpose of this document is to define the principles, rights, duties, responsibilities, among other aspects, related to the management of ethical and compliance issues in which the facts and conduct of the recipients of the Code of Ethics and Conduct<sup>1</sup> are verified. Likewise, the competencies and guidelines that guide the management of reports, complaints, dilemmas, consultations and use of the ethics hotline.

## 2. GENERAL CONDITIONS

### 2.1. Scope

This procedure applies to Ecopetrol S.A. ("Ecopetrol") and the companies within the Ecopetrol Group, and will be implemented according to the nature, jurisdiction, and structure of each company.

This document applies to administrators (members of the Board of Directors and legal representatives) and employees at all levels of Ecopetrol S.A. (Ecopetrol), as well as to those of the companies controlled or subordinated to the Ecopetrol Group (the "Group" or "GE"), along with their beneficiaries.

It also applies to all natural and legal persons (including suppliers, contractors, subcontractors, and strategic partners), as well as any individuals or entities engaged by these parties in any capacity for performing activities related to contractual relationships with the Ecopetrol Group. This is enforced through contractual clauses, integrity commitments, and other binding mechanisms, depending on the nature of the relationship.

In line with the Corporate Governance Model for the Ecopetrol Group (outlined in Guide GEE-G-041, or any document that replaces, repeals, or modifies it), this document must be adopted by Ecopetrol S.A. and those companies over which it exercises control (i.e., controlled/subordinate companies, including subsidiaries and affiliates). For entities not under Ecopetrol's control, this document may serve as a reference, with its principles and guidelines adopted as best practice where appropriate.


### 2.2. Terms and definitions

The terms and definitions associated with the interpretation of these instructions are listed in the [Ecopetrol S.A. Corporate Glossary](#)

### 2.3. General guidelines

Ecopetrol has set up an independent, efficient and reliable channel for the submission of reports, complaints, dilemmas and queries, called Ethics Line, easily accessible by anyone, which is available 24/7, enjoys confidentiality, even receiving anonymous reports, and is managed by a third party.

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

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According to the nature of the issue, the ethical line covers:

**Reports or complaints:** Description of facts and conduct allegedly constituting a violation of the Codes of Ethics and Conduct.

**Dilemmas:** These are doubts or concerns that the recipients of the Codes of Ethics and Conduct may have when faced with different situations that may have an impact on compliance with the principles, guidelines, rules and other aspects established in the Code. The purpose of presenting dilemmas is to receive advice and guidelines that must be followed.

**Consultation:** These are requirements related to the adequate fulfillment of their roles, functions and responsibilities by the participants or decision makers in due diligence procedures, for example, review of Ecopetrol's and/or its counterparties' ethics and compliance clauses and forms, associated with the prevention of acts of fraud, corruption, bribery, money laundering, terrorist financing, financing of proliferation of mass destruction weapons (ML/TF/FPMDW), violations of the FCPA and restrictions on free competition, among other conducts.

Through these consultations, warning signs are identified, evaluated and managed in a timely manner and with a preventive approach. Warning signals are issued to contractors, suppliers, partners or workers or other related counterparties, and preventive recommendations are issued to mitigate the warning signals detected, manage risks and make informed decisions by those responsible for each process, without incurring in co-management, but seeking to provide cross-cutting, strategic, and timely support to the business.

#### **2.4. Principles and rights in the presentation of dilemmas, consultations, reports or complaints.**


During the process of managing ethical and compliance issues filed through the ethics hotline, the following principles must be guaranteed:

**Good name and honor:** The right to good name and honor of those reported is respected, thus the submission of reports with false or biased information, or harmful statements and for purposes of revenge or retaliation are prohibited.

**Good faith:** Any report or complaint must be made in good faith, without making unsubstantiated value judgments, respecting the fundamental rights to privacy, dignity and the good name of individuals. Nobody should act maliciously, untruthfully, seeking to obtain benefits or to cause harm to a third party.

Submitting a report knowing that the elements or information contained therein do not correspond to reality constitutes a violation of the principle of good faith without prejudice of labor, disciplinary, criminal or civil sanctions.

**Promptness:** Dilemmas, queries or reports shall be handled in the shortest possible time, without unjustified delays.

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**Harmonious collaboration:** The management of dilemmas, consultations and reports will be carried out within the framework of cooperative and coordinated relations between the different competent areas.

**Confidentiality:** Reports will be handled confidentially. Confidentiality covers the identification of the reporter or complainant, facts, elements, evidence collected in the report processing. However, it is subject to the exceptions provided for by law or that due to the nature of the matter requires being transferred to a competent authority and/or area of Ecopetrol empowered to make decisions. Anyone who becomes aware of information related to an ethical matter must guarantee its confidentiality and adequate protection, care, custody and administration and may only share it for the purposes expressly permitted.

Likewise, the person who raises a report, dilemma and/or consultation must refrain from disclosing information related to these in their work, family and personal environment, including, but not limited to: (i) refraining from disclosing personal information about those involved, (ii) not sharing information in the course of meetings with co-workers, family, friends, among others, (iii) refraining from posting information on social networks related to the report, dilemma and/or consultation, (iv) not allowing access to electronic devices where the reported information is located, and (v) keeping the password to access the tool in a safe place.

**Human Dignity:** Dilemmas, queries, complaints and/or reports will be handled respecting and protecting the human dignity of all participants.


**Impartiality/Objectivity:** The persons who manage the information of an ethical matter from its presentation must abstain from intentionally favoring or harming a person or counterpart, maintaining objectivity in its management.

**Integrity:** It is the principle that represents coherence between what we think, say and do. An honest person is firm in the face of what is non-negotiable. They act consistently with commitment to life, respect, responsibility, rectitude, loyalty, justice, objectivity, honesty and transparency in the eyes of the company and society; they comply with the applicable internal and external regulations, the principles and rules adopted by the organization to prevent violations to the ethical standards and expectations referred to in this Code. However, integrity has an axiological scope that goes beyond the legal premise contained in the rules concerning various disciplines (labor, administrative, criminal, disciplinary or fiscal, etc.).

**Privacy:** In the management of reports, the privacy of those reported must be protected; therefore, it must be guaranteed that the information reported will not be disclosed or accessed in an irregular manner by personnel outside the ethics and compliance function.

**Non-retaliation:** Any direct or indirect action that adversely affects a bona fide whistleblower for the purpose of deterring, punishing, intimidating or injuring the whistleblower for filing or intending to file a report is prohibited.

**Data protection:** Dilemmas, queries, complaints and reports will be managed applying technical, human and administrative measures that are necessary to protect personal data, avoiding its alteration, loss, consultation, treatment, use or unauthorized access.

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**Integral protection for whistleblowers:** Whistleblowers in good faith who report facts and situations that may violate the Codes of Ethics and Conduct and applicable regulations will be protected. Hence, Ecopetrol defines the protection mechanisms in the Good Faith Whistleblower Protection Guide identified with the code SCU-G-001 or the document that takes its stead, seeking to generate an environment of trust that promotes free and safe reporting, particularly those conducts or acts of corruption, bribery, fraud, ML/TF/FPMDW, infringements to free competition, among others.

Similarly, when a situation is identified that may put the integrity of the user at risk, be it a worker, an external third party or the user's family members, the competent authorities will be informed in order to take the necessary actions.

**Confidentiality:** Dilemmas, queries, complaints and reports may include information that is restricted to the public for reasons defined in the Constitution and the law, among which are the right to privacy and intimacy of individuals and the protection of data concerning financial and commercial information.

The persons defined as administrators by Law 222 of 1995 have the duty to safeguard and protect Ecopetrol's commercial and industrial reserve.

**Sufficiency:** The response to dilemmas, queries, complaints and reports shall have the development, record and reasons that justify it.

## 2.5. Reliability and Security of the Ethics Line

The Ethics Line of Ecopetrol and its Group is the official channel for receiving queries, dilemmas and reports; it operates 24 hours a day, 7 days a week, guaranteeing confidentiality, impartiality and security of information, in addition to allowing anonymity.

This channel is managed by an internationally recognized independent third party, which adheres to the rigorous data protection standards of Europe and North America and has proven experience and security protocols for the information that is recorded through this channel.


The information contained in the ethical line is constituted as a personal database, duly registered and periodically reported to the Superintendence of Industry and Commerce (SIC for its initials in Spanish), thus complying with the regulations of personal data protection Law 1581 of 2012 or others that substitute it.

Internally, process control is implemented whereby permissions and accesses granted to ethical line users are periodically monitored, in full compliance with cybersecurity policies.

## 2.6. Management elements in the reports

During the management process, the following will be guaranteed:

**Objective and supported verification of the facts:** The Ethics and Compliance Management (GEC for its initials in Spanish) of the Corporate Compliance Department (RCU for its initials in Spanish) of Ecopetrol, or whoever takes its stead in the subordinate companies, through a qualified interdisciplinary team, performs the verifications based on criteria of specialty, proportionality, immediacy and

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seriousness of the conduct, thus, prioritizing conducts that may have greater impact on the materialization of risks at Ecopetrol.

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

Consequently, all those involved in the management of the report must notify their hierarchical superior of any situation that may generate a potential or actual ethical conflict and/or conflict of interest.

**Follow-up:** The ethics hotline user must monitor the process, even if it was formulated anonymously, using the key issued by the system and the password created by the user; this ensures that the questions that arise during the verification process will be resolved in a timely manner, allowing their proper processing and closure.

**Response:** Through the ethics hotline, a response should be issued on the management of the matter informing in a general manner its termination.


**Conservation of documents:** Verifications shall be duly documented, and such documentation shall be kept permanently in the repository provided for such purpose. The information entered into the tool by each verifier is supported by document retention tables in accordance with the Document Management guidelines of the respective company and the applicable legislation.

**Specialty:** The verifications will be conducted according to the particular conditions, the context, the potential conduct to be verified and the individual circumstances that allow establishing the most suitable methodology to ensure timely and rigorous results; however, they will maintain a general framework of action that promotes transparency and prior knowledge of the steps to be taken, the stages, and the observance of an objective procedure, the protection of rights, and minimum guarantees.

**Cooperation:** Workers and contractors have the responsibility to cooperate opportunistically in the management of reports or complaints. Consequently, the RCU may require the submission of information, which must be sent within 5 working days. In the exceptional event that it is not possible to respond within this period, it may be extended for an additional 5 days.

## 2.7. Jurisdiction for managing cases


COMPETENT BODY	COMPETENCY
<b>AUDIT AND RISK COMMITTEE OF ECOPETROL'S BOARD OF DIRECTORS (CAUD, FOR ITS ACRONYM IN SPANISH)</b>	In accordance with the provisions of the Internal Regulations of the Audit and Risk Committee of the Board of Directors of Ecopetrol (article 10, paragraphs 31 and 32), reports involving the President of the CAUD shall be handled by the other members of the CAUD, who may rely on the RCU, in any case, the President of said committee.
<b>PRESIDENT OF THE AUDIT</b>	Reports or complaints that:

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<p><b>AND RISK COMMITTEE OF ECOPETROL'S BOARD OF DIRECTORS</b></p> <p>The CAUD will assign the knowledge of the matters under its competence<sup>2</sup> to its President, who will manage them directly or will rely on the RCU or on the ad hoc Compliance Officer.</p>	<ul style="list-style-type: none"> <li>• Link members of Ecopetrol's Board of Directors.</li> <li>• It involves the President of Ecopetrol and senior management personnel, as defined by the Corporate Vice Presidency of Organizational Talent, as follows: "Positions considered part of Senior Management include those classified as 'first level' and 'second level' according to the company's organizational structure, and which report directly to the President and/or the Executive Operational Vice Presidency. This also includes Managers who exercise disciplinary authority as expressly required by law. This classification serves as a guiding criterion in accordance with the legally regulated levels for public employment." This applies to cases involving alleged acts of corruption, fraud, bribery, money laundering, terrorist financing, financing the proliferation of weapons of mass destruction, as well as violations of the FCPA, SOX, and restrictions on free economic competition.</li> <li>• May cause a material impact on the Internal Control System, Integrated Risk Management System, or imply a high reputational, economic, financial or operational risk for Ecopetrol.</li> <li>• Impact Ecopetrol's financial statements, its reputation or its subsidiaries.</li> <li>• Link to the Corporate Director of Compliance, their Managers or RCU staff and Corporate Director of Internal Audit.</li> <li>• Involve former RCU employees and former Corporate Internal Audit Managers.</li> </ul> <p>The president of Ecopetrol's CAUD and the presidents of the body that take its stead in subordinate companies, may assign the matters under its responsibility to Ecopetrol's Corporate Director of Compliance, with the following exceptions:</p> <ul style="list-style-type: none"> <li>• When the report involves Ecopetrol's Corporate Compliance Director, RCU Managers or RCU personnel, the CAUD President may appoint an Ad hoc Compliance Officer.</li> <li>• When the report involves former RCU employees. In that case, the CAUD President may appoint an Ad hoc Compliance Officer.</li> </ul>
<p><b>AUDIT AND RISK COMMITTEES OF BOARDS OF DIRECTORS OF ECOPETROL GROUP COMPANIES</b></p>	<p>In accordance with the provisions of the Internal Regulations of the Audit and Risk Committee of the Board of Directors, or the one that takes its place in each subordinate, the reports or complaints that:</p> <ul style="list-style-type: none"> <li>• Involve members of the Board of Directors of the respective company.</li> <li>• Involve the President, senior management employees or those who take their place in the respective subordinate, referring to</li> </ul>


<sup>2</sup> Internal Regulations of the Audit and Risk Committee of the Board of Directors of Ecopetrol, Article 10, paragraphs 31 and 32.



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	<p>alleged acts of corruption, fraud, bribery, money laundering, terrorist financing, financing of the proliferation of mass destruction weapons, violations of the FCPA, SOX and antitrust regulations.</p> <ul style="list-style-type: none"> <li>• May generate a material impact on the Internal Control System, Integrated Risk Management System or imply a high reputational, economic, financial or operational risk for the respective subordinate company.</li> <li>• Impact the subordinate company's financial statements.</li> <li>• Link former employees of the subordinate's compliance area.</li> </ul>
<b>ECOPETROL ETHICS COMMITTEE</b>	In accordance with Circular GOC-J-001, which regulates the operation of Ecopetrol's Ethics Committee, this committee will be in charge of the closure decisions suggested in the ethics and compliance verifications that have an impact on the employment relationship of the employee(s) involved.
<b>CORPORATE COMPLIANCE DIRECTOR OF ECOPETROL - COMPLIANCE OFFICER OF ECOPETROL</b>	<p>Reports or complaints that:</p> <ul style="list-style-type: none"> <li>• May impact the consolidated financial statements of Ecopetrol and its subsidiaries, when the competence is not assumed by CAUD.</li> <li>• Are from Ecopetrol or a subordinate and are not under the jurisdiction of the CAUD according to their complexity, potential impact on the effectiveness of the Compliance Program System, business risk or Internal Control System, Integrated Risk Management System.</li> <li>• Are filed against Compliance Officers or former Compliance Officers of the subordinates, when they do not fall under the jurisdiction of the CAUD. Process impediments, recusals or situations of ethical conflict or conflicts of interest of Compliance Officers of subordinates.</li> <li>• Are assigned by the CAUD President.</li> </ul>
<b>ECOPETROL ETHICS AND COMPLIANCE MANAGEMENT</b>	<ul style="list-style-type: none"> <li>• Ecopetrol's reports or complaints filed through the ethics hotline that have not been assigned a special competence and those that correspond to subordinate companies that are selected due to their complexity, potential impact on the effectiveness of the Compliance Program System, upon request of the subordinate or by instruction of the RCU or the CAUD.</li> <li>• Ecopetrol dilemmas and consultations formulated by the members of the Board of Directors, Presidents, Vice Presidents and Compliance Managers, Compliance Officers of the subordinates or those acting in their stead, as well as, residually, the other consultations and dilemmas presented.</li> </ul> <p>In the case of subordinates' matters, cases will be assigned through the Ethics Line to the Ethics and Compliance Manager of the corresponding subordinate.</p>
<b>COMPLIANCE MANAGERS OF THE SUBORDINATE</b>	Reports, complaints, dilemmas and consultations of the subordinate not having specific instance and competence in




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<b>COMPANIES OR WHOEVER IS ACTING IN THEIR STEAD</b>	Ecopetrol.
<b>CORPORATE LEGAL VICE PRESIDENT AND GENERAL SECRETARY - AD HOC COMPLIANCE OFFICER OF ECOPETROL</b>	<ul style="list-style-type: none"> <li>Process reports or complaints involving people or situations that generate conflicts of interest or ethical conflicts with respect to Ecopetrol's Compliance Officer.</li> </ul> <p>Ecopetrol's Compliance Officer will inform the CAUD, who will decide whether the conflict exists, in which case the CAUD president will designate, via e-mail, the person holding the position of Corporate Vice President, Legal and General Secretary as Ad hoc Compliance Officer.</p> <ul style="list-style-type: none"> <li>Process reports or complaints assigned directly by the CAUD President.</li> </ul> <p>The assigned verification processes may require the support of:</p> <ul style="list-style-type: none"> <li>Case Manager of the Ethics and Compliance Management for the following activities: (i) reception of the report; (ii) assignment; (iii) management of extensions if necessary; (iv) closure of the verification at the request of the Ad Hoc Compliance Officer. The independence of the Case Manager shall be guaranteed in matters within the competence of the ad hoc Compliance Officer.</li> <li>Forensic analysis: The CAUD President will designate the area in charge of providing this support, upon request of the ad hoc Officer. This support will not be provided by RCU personnel.</li> </ul>
<b>CORPORATE LEGAL VICE PRESIDENCY AND GENERAL SECRETARY, ADMINISTRATIVE AND SERVICES VICE PRESIDENCY</b>	In the event that a report and the corresponding closing actions are related to contractual matters in the framework of the relationship with suppliers and contractors, the closing action will be forwarded to the Corporate Legal Vice Presidency and General Secretary, and the Administrative and Services Vice Presidency for the appropriate decisions to be taken in accordance with the binding legal and contractual provisions.

## 2.8. Roles and Responsibilities of Ethics and Compliance Management

### 2.8.1. Corporate Compliance Director of Ecopetrol:

- Issue corporate guidelines related to the compliance function in the Ecopetrol Group, which is comprised of: The Internal Control System, the Integrated Risk Management System, ethical standards and functions of control entities, in the management of verifications and cases of impact for the Group.
- Lead the relationship with business areas to promote the adoption of the highest ethical standards, to prevent violations to the Codes of Ethics and Conduct.
- Provide support in key EG decision making to identify, prevent and control risks.
- Lead the continuous improvement of the Internal Control System, Integrated Risk Management System based on the conclusions of the verification of reports.

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- Define the management indicators of matters registered in Ecopetrol's ethics line and follow up on them.
- Establish guidelines for the adequate assurance of cases, their prioritization, identification of synergies, patterns of conduct and application of the ethical clause as per the scope of Ecopetrol and its subordinates.
- Inform the Ethics Committee and the CAUD about relevant cases and results of the management of ethics and compliance issues covered by this procedure.
- Exercise the role of Leader of the Ethics Committee.
- Issue guidelines for prevention, detection, response, monitoring and strategic accompaniment in the integral management of compliance issues with the areas of internal control, risks, ethics, control and disciplinary entities, among other areas, and roles in Ecopetrol and its subordinates.
- Generate synergies and coordination of the compliance function in the EG with the risk management areas, preserving the independence and objectivity of his functions.

### **2.8.2. Ethics and Compliance Manager of Ecopetrol:**

- Report to the Corporate Compliance Department, the management of matters received and processed, which are considered impact cases (reputational impact, compliance typologies, impact on consolidated financial statements). Further, those related to violations of the FCPA, SOX Act, corruption, bribery, fraud, money laundering, terrorist financing and financing of the proliferation of mass destruction weapons, violations of the free competition regime, discrimination, harassment or sexual violence, among others.
- Issue answers to the dilemmas and queries registered in the Ethics Line and that are under the competence of Ethics and Compliance Management.
- Authorize the extension of the terms for the processing of reports, dilemmas and consultations on the affairs of Ecopetrol and its subsidiaries.
- Appointing the Ethics Line administrator for case management.
- Prepare the reports that the Corporate Compliance Department must submit to the Board of Directors, the CAUD, the President, the Ethics Committee and other authorities that may require it due to its competence.
- Act as Secretary and Chief Verifier on the Ethics Committee.
- Make timely follow-up on the management of matters registered in the ethics line and prioritize the issues, in accordance with the guidelines provided by the Corporate Compliance Department.
- Assign issues to internal or external verifiers according to their profile and specialty.
- Follow up and issue guidelines on the verifications performed in Ecopetrol and in the companies that make up the Group, for possible violations of the Codes of Ethics and Conduct. Advise the subordinate companies of Ecopetrol S.A. in the compliance investigations they conduct, including continuous improvement actions.
- Carry out transfers to internal areas and external authorities as required.
- Analyze management results to propose actions for continuous improvement.

### **2.8.3. Compliance Managers of the Group's companies or whoever acts in their stead:**

- Provide support for the company's strategic decisions, risk analysis and controls.
- Implement the guidelines issued by Ecopetrol aimed at promoting a culture of integrity in the company.
- Coordinate the areas of the company in the identification, administration and management of its risks.

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- Report progress, statistics and indicators to the Corporate Compliance Department on the management of ethics and compliance matters and follow up accordingly.
- Present and support before the Ecopetrol's Corporate Director of Compliance, or the person delegated by him/her, the matters and their management, when required.
- Submit the necessary and sufficient information for the management and closure of cases, when required by the Corporate Compliance Department, or to meet requests from areas of the subordinate, Ecopetrol and/or external authorities.
- Follow up on the matters registered on the ethics line and prioritize the issues, in accordance with the guidelines provided by the Corporate Compliance Department.
- Inform Ecopetrol's Ethics and Compliance Manager of the closing actions that imply transfers to the internal areas of the subordinate or to external authorities, for the corresponding analysis, in accordance with the guidelines issued for the management of issues filed in the ethics line.
- Analyze management results to propose actions for continuous improvement and to establish the company's training and coaching plan on ethics and compliance issues.

#### **2.8.4. Compliance Investigations Leader:**

- Coordinate compliance investigations related to corruption, fraud, bribery, money laundering, terrorist financing, financing of the proliferation of mass destruction weapons, ethical conflicts and/or conflicts of interest, sexual harassment or violence, violation of the competition regime, issues related to the procurement of goods and services, and other ethics and compliance typologies.
- Coordinate the identification of behavior patterns, affected areas and divisions to improve prevention, detection and monitoring actions performed by the Directorate.
- Consolidate and report to the Ethics and Compliance Management the progress, statistics and indicators of the management of ethics and compliance matters.
- Advise Management regarding implementation of best practices for compliance matters, as well as in the permanent updating of the national and international regulations governing Ecopetrol S.A.
- Support the preparation of reports to be submitted by the Corporate Director of Compliance to the Board of Directors, the CAUD, the President, the Ethics Committee and other authorities.
- Make timely follow-up on the management of the reports registered in the ethics hotline and prioritize the issues, in accordance with the guidelines given by the Corporate Compliance Department and Ethics and Compliance Management.
- Assign issues associated with compliance typologies to internal or external verifiers according to their profile and specialty.
- Issue guidelines to the verifiers for the processing and definition of methodological plans for the assigned issues, ensure the proper classification of the issues according to the different typologies, as well as their closure.
- Carry out transfers to internal areas and external authorities as required.
- Analyze management results to propose actions for continuous improvement.
- Receive, analyze and approve/deny requests for digital evidence required by ethics and compliance verifiers.

#### **2.8.5. Computer forensic analyst:**


- Ensure the reliability, legality, traceability and sufficiency of the technical deliverable to the verifier of the issue, dilemma or consultation and to the authorities that request it.
- Adequately document computer forensics and digital evidence securing procedures.
- Follow the principles of Identification, Collection, Acquisition and Preservation of Digital Evidence (ISO 27037 Standard).

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- Attend to the requirements of ethical and compliance matters, which have been requested and justified through the tool provided for such purpose.
- Maintain an updated inventory of cases and queries of digital evidence that has been collected and processed.
- Render the management reports requested on matters under their charge.
- Ensure that the technical deliverables comply with the requirements of the expert opinion, established in the General Code of the Process, or the regulation that replaces it.

#### **2.8.6. Verifiers of the issues:**

- Act with the utmost diligence, objectivity, independence, impartiality, responsibility and assurance of the matters under their charge.
- Maintain the confidentiality of matters under their charge, even after their termination or completion of the assignment.
- Promote continuous learning of topics and disciplines in accordance with the assigned typologies.
- Design the methodological plan to verify the issues assigned, in accordance with the provisions of this procedure, the issue management flowchart (Annex 1) defined by the Corporate Compliance Department and the particularities of each case. In any event, the following stages must be ensured: hypothesis, collection of information and data, analysis, conclusions, closing actions (if applicable).
- Report in a timely manner any situation that may result in an ethical conflict or conflict of interest or that has the potential to affect objectivity, independence or impartiality in a verification. This report must be conveyed to the Compliance Investigations Leader, so that, if appropriate, a new verifier can be appointed for the particular case.
- Gather the necessary information for the analysis of cases, by means of documents, data, technological tools, without limitation.
- Request computer forensic analysis (when required), identifying the elements that delimit the search.
- Conduct interviews, when deemed pertinent for the development of the verification.
- Ensure that the termination of the issue is based on background, evidence, precedents, documents, among other means that allow reaching sound, sufficient and credible conclusions.
- Prepare closure reports containing the corresponding decision, stating the activities performed, respective findings and recommendations, if applicable.
- Maintain evidence and support for the verifications, conclusions and statements made in the reports and ensure that they are recorded in a timely manner in the ethics line, as the only official repository for reports, dilemmas and queries.
- Resolve reports within the terms established in this document and request extensions if necessary.
- Evaluate the impact of the facts analyzed against the risks and process controls, in which case it will be transferred to the respective areas for analysis and action taking.
- Evaluate the transfer of the matter to internal or external areas, prior validation of the Corporate Compliance Director, Compliance Investigations Leader, the Ethics and Compliance Manager or the subordinate.
- Conduct the ethical talks provided at the closing of each case and leave a record of this activity in the ethics line.
- Follow up on the decisions adopted by the competent areas and report their support and closure in the ethics hotline. All information on the management of the matter must be in the ethics hotline, the official repository of institutional information.
- Render the management reports requested on the matters under their charge.
- Provide the necessary information to respond to the requirements of internal areas or external authorities on the matters in their charge.
- Support in due form the cases in their charge, in the instances in which they are required.

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- Update, including after closing, the cases managed, with the information received related to each matter.
- Develop the hypotheses subject to verification and assurance of cases with a vision of synergy with the other RCU working groups and preventive assurance of process risks with the areas impacted by the cases in their charge.
- Adequately document the review of all data required to resolve all questions, concerns or aspects of dilemmas, queries and reports.


The matters may be assigned among the different RCU work teams, the Compliance Officers of the subordinates and their teams. Third parties may also be contracted for verification, ensuring the applicable regulations, the scope of each team and the risks inherent to each specific case.

#### **2.8.7. Ethics Line Manager (Case Manager):**

- Perform with the Compliance Investigations Leader and/or the Ethics and Compliance Manager, as appropriate, the analysis to assign and classify the matters for the distribution by competencies of the verifier and/or the corresponding subordinate, in accordance with the criteria set forth in this procedure.
- Validate the sufficiency and quality of the initial data recorded in the ethical line, prior to distribution, and complete the data where applicable
- Transfer to the corresponding areas the issues that do not fall under their competence, according to the provisions of this procedure, and inform the user of such management.
- Handle and close all matters classified as "Informational", i.e., matters that do not fall under the competence of the ethics and compliance function and do not require management by the company.
- Manage the follow-up and timely compliance of the matters in charge of the verifiers and the Compliance Officers of the Subordinates, to generate alerts on the expiration of terms and the adequate closure in the tool.
- Respond to ethics background requests to Ethics and Compliance Management personnel and/or verifiers, Compliance Officers of subordinates, upon written and justified request.
- Close cases in the system, after approval or authorization, as appropriate, by the Compliance Investigations Leader, the Ethics and Compliance Manager, or whoever takes their place in the respective subordinate, recording the evidence of approval or authorization in each case.
- Close the consultations and dilemmas, on which the corresponding response has been sent.
- Verify that all matters closed in the tool have the respective report or record of closure, and that there is a record of the management and follow-up of the closure actions.
- Support the statistics of the matters filed in the ethics hotline to identify areas, complainant, denounced, typologies, annuality, stakeholders, topics, and other characteristics.
- Consolidate on a quarterly basis a report of all closure actions in effect for follow-up by verifiers.
- Conduct the activities defined in section 2.7. referred to "Competence for handling matters" of this procedure, in the management of reports or complaints that fall under the competence of the ad hoc Compliance Officer.

#### **2.9. Matters that are not within the competence of the Corporate Compliance Management**


In the case of matters that correspond to other areas of the company or external entities, the transfer will be made in accordance with the subject matter.

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SUBJECT	FACTS	TRANSFERS
<b>Contractual</b>	<ul style="list-style-type: none"> <li>• Observations or claims filed in the processing of a contractual process that should be known by the authorized officer and/or the evaluation committee within the contractor selection stages; provided that they are not derived from possible breaches of functional duties or principles managed by the parties to the contract.</li> <li>• Complaints from contractors/suppliers against other contractors/suppliers, for events occurring in facilities other than those of Ecopetrol or its subordinates or outside the development of their contracts with Ecopetrol or its subordinates; provided that they are not derived from possible breaches of functional duties or principles managed by the parties to the contract.</li> <li>• Rights of petition within the framework of contract management.</li> <li>• Delay in the payment of obligations by suppliers and contractors, or non-compliance with civil obligations that are not the responsibility of Ecopetrol or the respective Group company; provided that they are not derived from possible non-compliance with functional duties or principles of the parties to the contract.</li> </ul>	Administrative and Services Vice Presidency or the area acting in its stead.
<b>Labor</b>	<ul style="list-style-type: none"> <li>• Issues associated to non-payment or late payment of salaries, social benefits, per diems, travel expenses and other emoluments derived from the employment relationship with Ecopetrol or a subordinate company.</li> <li>• Requests for reimbursement.</li> <li>• Employee performance appraisals, except in the case of procedural errors.</li> <li>• Workplace Harassment.<sup>3</sup></li> </ul>	Corporate Vice Presidency of Organizational Talent or the area that takes its stead.  Labor Coexistence Committee (Workplace harassment)
<b>Health</b>	<ul style="list-style-type: none"> <li>• User dissatisfaction with the provision of health services.</li> <li>• Issues associated with disability evaluations or medical-occupational restrictions.</li> <li>• Requests or complaints from users regarding medications, treatments, medical orders, medical opinions or concepts, facilities where</li> </ul>	Corporate Vice Presidency of Territorial Transformation and HSE or the area that takes its place.

<sup>3</sup> Law 1010 of 2006 defines it as any persistent and demonstrable conduct, exercised on an employee or worker by an employer, a boss or immediate or immediate superior, a co-worker or a subordinate, aimed at instilling fear, intimidation, terror and anguish, to cause labor damage, generate demotivation at work, or induce resignation from work.



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	medical services are provided.	
<b>Communities</b>	<ul style="list-style-type: none"> <li>• Requests for social investment in the regions.</li> <li>• Non-compliance with hiring of personnel due to lack of priority in the community.</li> <li>• Claims for dumping or environmental contamination.</li> <li>• Damage caused by oil spills.</li> </ul>	Corporate Vice Presidency of Territorial Transformation and HSE or the area that takes its stead.
<b>Others*</b>	<ul style="list-style-type: none"> <li>• Domestic violence.</li> <li>• Food non-attendance.</li> <li>• Issues that involve the protection of minors or that are within the knowledge of the ICBF or the family justice system.</li> <li>• Extramarital affairs, infidelities that do not imply a violation of Ecopetrol's Code of Ethics and Conduct.</li> <li>• Non-compliance of civil obligations on the part of workers, due to issues unrelated to the company, and that do not affect the work environment, without prejudice to those that should be transferred to the Disciplinary Instruction Management, in accordance with the provisions of Law 1952 of 2019, or that which modifies or repeals it.</li> <li>• Alleged misuse of social networks or digital media for personal use.</li> </ul>	Competent authority (e.g. Attorney General's Office, Family Commissariats, ICBF, conciliation centers, judicial branch, etc.).  *Because of the nature of these matters, it is up to each interested person to bring them directly to the attention of the competent authorities.

### 3. DEVELOPMENT

#### 3.1. Reports or complaints

##### 3.1.1. Protection and respect for Fundamental Rights


The protection and guarantee of the fundamental rights of all those involved in a verification process is the starting point of any action and serves as the backbone on which the procedural stages and actions are based.

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

The internal verification procedure aims to corroborate facts and/or conducts that do not comply with the ethical or legal framework regarding compliance and the application of the provisions contained in the Code of Ethics and Conduct of the Ecopetrol Group, as well as in the Code of Ethics and Conduct for Suppliers and Contractors, which ends with the conclusion as to whether the matter is corroborated, without this having a sanctioning scope.

The activities and actions carried out within the framework of a verification must, in addition to observing the provisions contained in this document, ensure that the following rights are guaranteed:



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- **Dignity:** Is the source of all rights and consists of a profound expression of respect for human beings, of the recognition and self-worth of each individual.
- **Equality:** All people involved in a verification must be treated equally whenever the circumstances are the same; differences in treatment must have a well-founded and reasonable justification. Equal consequences must be applied to equal factual assumptions.
- **Privacy:** Consists of the right to enjoy a private and reserved area to develop a full and free personal and family life, excluded from the knowledge and intrusions of third parties, provided that the fullness and freedom do not interfere with the rights of third parties or imply a violation of the ethical or legal framework.

Further, segregation of duties is ensured in the process, whereby the verification process and decision-making are carried out by different workers.

As a result of the verifications, the Compliance Investigations team, as well as other areas of the RCU, when appropriate, make recommendations to the competent areas of the company to accept them or not. The respective areas will conduct the corresponding internal procedure in cases where the imposition of sanctions is necessary.

In such events, when the competent area determines a consequence of a punitive nature, it must ensure the due process of the action, guaranteeing the following minimum parameters: (i) application of the procedure previously established in the corresponding norms; (ii) impartiality; and (iii) the fundamental rights of the affected party.

### 3.1.2. Methodology of the verification process


Any report or complaint received through the Ethics Line will undergo the corresponding verification process to establish with rigor and reasonableness the alleged deviation to the ethical or legal framework in compliance matters.

Anonymous reports may be submitted in good faith, must be supported and documented, with evidence. Anonymous reports that are reckless, unfounded, lacking evidence, and that affect the privacy, good name, honor and dignity of individuals will not be received.

Therefore, when the report does not contain the necessary information for its management, the verifier shall make up to two requests for complementation or expansion to the reporter through the ethics line and/or the means identified by the reporter (when applicable). If no or insufficient response is obtained, the matter will be closed as "Insufficient Information", subject to the approval of the competent person, ensuring due diligence, traceability and documentation related to the approach. All issues may be re-verified when additional information is available.

A prior validation stage will be carried out when the report or complaint does not include circumstances of time, manner and place or other relevant data that show indications of a violation of the Code of Ethics and Conduct.

Each case will be analyzed and reviewed according to its nature and circumstances; however, in all cases it will be necessary to have objective elements and analysis of evidence that allow us to reach the conclusions proposed with sufficiency and reasonableness.

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For this purpose, different activities may be carried out, as required, to corroborate or not the hypothesis raised, such as interviews, review of documents consulted, submitted or requested by the assigned verifier, review of the profile published in the corporate tool, computer forensic analysis, analysis of records, corporate tools, data, monitoring, among others, without incurring in evidentiary fees.

The RCU, through the verifier of the matter, shall prepare a report concluding, based on the elements described in the previous paragraph, if the hypothesis raised is corroborated or not, and if closure actions are recommended.

The Ethics Committee will be the decision-making body for the closing recommendations derived from the verification process carried out by RCU in cases that have an impact on the termination of labor relations

### **3.1.2.1. General protocol for conducting interviews**

- Interviews will be carried out in accordance with individual needs and criteria established during the individual analysis of the cases and will serve as one of the different means to learn, deepen or confirm information in order to ensure the proper verifications.
- When the verifier chooses to conduct an interview, he/she must perform a rigorous analysis and have the required knowledge, training, skills, sound logic and professional skills.
- The verifier must be clear about the purpose of the interview and validate the source of the information that gives rise to the report in order to assess its reliability and credibility, and thus determine its origin and relevance.
- The verifier should emphasize to the interviewee the confidential and individual nature of the interview and that the interview is part of an ethical duty of collaboration and cooperation with the company.
- As a general rule, the interview should start from the general to the particular, therefore, the background, the people involved including their roles and responsibilities, the context of the issue, the applicable regulations, the company process related to the issue, the Management and Internal Control System, the associated controls and risks, the relevant alarms generated by the Monitoring group, etc. should be clear.
- The interview should take place in a safe, calm, respectful and cordial environment, where the interviewee can freely express everything he/she knows about the facts without feeling intimidated, pressured or oriented to give suggested answers.
- The verifier should generate an atmosphere of empathy with the interviewee without losing the independence and objectivity of the interview.
- The verifier should ask simple, relevant, useful and concrete questions instead of ambiguous, confusing, contradictory, accusatory, persuasive, suggestive or disqualifying questions that create a hostile environment with the interviewee and frustrate the objective of the interview.
- Each question should address a relevant aspect as the main idea and not several simultaneous facts, always taking into account chronological aspects and harmoniously intertwined.
- The verifier shall maintain control and control of the interview by preventing the interviewee from directing, distracting, confusing or diverting attention from the relevant aspects, and emphasizing the implication of incurring in falsehoods, dilatory maneuvers or hindering the verification of the facts.
- The verifier will assess the direct and personal knowledge of the facts being validated by the interviewee, in order to recognize whether his or her statement is based on perceptions, assumptions, undefined denials, hypothetical or conditioned situations.
- The verifier, if necessary, may exhibit the documents that support any question raised.

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- The verifier, depending on the nature of the case, may interview the respondent before closing and consider the hypothesis of the case to be corroborated or not.
- In the event that the interview is recorded by any technological means, the interviewee must be previously informed and the corresponding authorization must be obtained for the purposes covered by the Ethics and Compliance Management Procedure.
- In cases where recording is not authorized, the interview should be written up, closed and subscribed immediately. Space and time should not be given for subsequent subscription as this may jeopardize its genuine intent, integrity, reliability and confidentiality. The text and statements of the interview may not be disseminated to third parties.
- If deemed necessary, a new interview may be carried out in order to address facts that were not covered, initially unknown or, if required, to clarify, deepen or validate issues already known.
- The verifier shall at no time make agreements, offers or transactions to the interviewees regarding the matter.

### 3.1.3. Stages of the Procedure

The reports will be filed with the ethics line and the following steps will be followed, as appropriate:

- **Recording:** In the ethical line, by the reporter or whoever has knowledge of the matter by any means.
- **Transfer to the competent internal area:** When the matter should not be handled through the ethics hotline, as defined in section 2.9. of this procedure.
- **Analysis of the attributes of the issue:** Impact, credibility, complexity, security conditions and urgency.
- **Prior validation<sup>4</sup>:** When the report or complaint does not present elements or clear indications of violation of the Code of Ethics and Conduct, a verifier will be assigned to carry out a preliminary analysis of the information provided, following the methodology of the verification process established in section 3.1.2.
- **Assignment of the verifier (internal or external):** When the report concludes the previous validation stage or has been determined as verification from the moment of its reception, it will be assigned according to the characteristics of the matter, the experience, the profile of the work teams, including their academic background and professional trajectory with respect to the topics of the previously assigned matters.
- **Review and approval by the Corporate Director of Internal Audit:** Review and approval by the Corporate Director of Internal Audit regarding permissions for verifiers to access information tools and databases.
- **Adoption of preservation measures:** Custody requirements of relevant information, capture of company information stored in the different corporate physical or electronic media, securing the respective images, copy of information recorded in technological tools, or accounting records, among others, in accordance with the applicable regulations in force, the corporate technological tools available for such purpose, and taking into account the management of the applicable risks according to the measure adopted.
- **Adoption of preventive measures:** Request to the competent area that the reported or denounced person be removed or transferred to another area, suspend an internal procedure, designate new interlocutors, transmit an alert to an internal area, among others, taking into account in all cases the risks associated with the processes and the business risks that may derive from the adoption of the measures.

<sup>4</sup> Applies only to Ecopetrol

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- **Approach and development of the methodological plan:** The hypothesis will be defined (initial approach to be verified), as well as the work plan, according to the hypotheses, determining the steps to be followed, the way to ensure it and the follow-up of its progress; this plan must be comprehensive, with a preventive approach to the company's processes, with a risk management and control vision.
- **Interviews - when applicable:** Interviews will be conducted when deemed appropriate or necessary and will be carried out with the required participants or experts. Failure to respond will not preclude closure of the issues.
- **Closing decision:** With the corresponding conclusions and recommendations.
- **Approval of the final report:** With details of the matters verified and the respective evidence. Depending on the matter, the report is sent to the Corporate Legal Vice Presidency or to the Corporate Vice Presidency of Organizational Talent, so that these areas can validate whether an administrative labor process is appropriate.
- **Final report approved:** With the approval of the corresponding instance (Compliance Investigations Leader, Ethics and Compliance Manager, Corporate Director of Compliance).
- **Notification of termination to the reporter or whistleblower:** Through the ethics hotline in general, taking into account the confidentiality of the verification process.
- **Corresponding transfer documents:** Alarms, recommendations, among other actions to the competent areas (Corporate Vice Presidency of Organizational Talent, Administrative Vice Presidency and Services, etc.) or to the subordinates with corporate approach of Ecopetrol Group. These areas make decisions according to their competence, ensuring the risks arising from these decisions.
- **Conduct of ethics talks (when applicable):** By the verifier of the subject matter.
- **Closure of the matter in the tool:** After uploading the closure report, the supporting evidence, transfer memorandums (when applicable), official letters (when applicable), proof of completion of the ethics talk (when applicable).

### 3.1.4. Applicable actions

#### 3.1.4.1. Pre-closing actions by Ethics and Compliance Management


During verification, prior to closure, early warnings may be carried out by the competent areas upon request by the RCU.

**Early warnings** will be issued to responsible areas when there is knowledge of facts that may lead to possible disciplinary, criminal or fiscal misconduct or violation of the Codes of Ethics and Conduct and/or the Internal Work Rules, so that the corresponding actions may be taken, if applicable. For an early warning to be generated, a corroborated verification is not required.

At the end of the verification, the reports or complaints are closed, indicating whether the matters brought to the attention of the Ethics and Compliance Management through the ethics hotline were corroborated, not corroborated or if the information was insufficient. Based on the conclusions of the verification included in the closure report, one or more actions will be taken by the following instances:

#### 3.1.4.2. Closing actions by the Ethics and Compliance Department

- **Preventive talks**, through the Excellence in Prevention and Monitoring team of the Ethics and Compliance Management, talks oriented to personal strengthening and training may be given to

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reiterate the commitment to the ethical guidelines, or in groups to disseminate knowledge of the ethical guidelines and/or competencies, leaving a written record.

- **Ethics talk:** By the case verifier, to reiterate the commitment to the ethical principles and guidelines, leaving a written record.
- **Internal transfer - other areas of the Company:** Administrative and Services Vice Presidency in the aspects not regulated in section 3.1.4.4 Corporate Internal Audit Department, Disciplinary Instruction Department or those acting in their stead, as appropriate, Corporate Vice Presidency of Organizational Talent when the recommendation does not imply the termination of the employment relationship, among others. The competent areas shall decide whether or not to adopt the actions recommended by the Management, which shall be recorded accordingly.
- **Transfer to risk management and internal control areas or those acting in their stead:** In order to determine whether the fact corresponds to: (i) materialization of a business/process risk, (ii) absence of a business/process risk cause or event, (iii) absence and/or failure of a mitigating factor (control and/or TA) associated with the business/process risk, (iv) overstepping of the company's Internal Control System by the individual (not manageable by GIR-GCI), and implement the applicable mitigating factors. In the case of subordinates with a direct compliance function, it is up to the Compliance Officers, or whoever takes their place, to carry out such analysis.
- **Transfer to competent authorities:** Office of the Attorney General of the Nation, Office of the Comptroller General of the Republic, Office of the Attorney General of the Nation, Superintendencies, Central Board of Accountants, Superior Council of the Judiciary, UIAF, or those acting in their stead, among other authorities or state entities for their knowledge and competence when appropriate.

### 3.1.4.3. Actions emanating from the Ethics Committee

The Committee shall decide on the closure actions recommended in the closure report of the ethics and compliance verifications that have an impact on the employment relationship of the employee(s) involved, in accordance with the provisions of its Internal Regulations (SCU-R-001).

- **With respect to employees:** Termination of the employment contract.


### 3.1.4.4. Actions emanating from the Corporate Legal Vice Presidency and General Secretariat and the Administrative and Services Vice Presidency

- **With respect to contractors, suppliers, customers, clients, allies, partners:** Termination of the contract with the Ecopetrol Group, design and execution of an improvement plan, incentives, among others, in accordance with the review carried out by these vice presidencies in consideration of the recommendations issued in the closing report of the ethical verifications.

### 3.1.5. Special considerations related to alleged situations of sexual harassment or violence

Sexual harassment or sexual violence are strongly rejected by the Ecopetrol Group as they constitute behaviors that impact human rights, affecting the welfare, safety, dignity and integrity of people.

The verifications related to the alleged commission of these conducts will be developed in harmony

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with the Guide for the Prevention and Attention of Sexual Harassment and/or Discrimination in the Workplace, which addresses these situations integrally and provides protection, confidentiality, and tools that avoid re-victimization and covers all measures to promote a safe environment for the alleged victims, without ignoring the fundamental rights of the alleged aggressor, as well as the presumption of innocence.

Verifiers in charge of matters under this typology will be provided with special training due to the nature and implications of these behaviors.

### 3.2. Dilemmas and queries

In relation to dilemmas and consultations, the ethics and compliance professionals appointed by the Ethics and Compliance Management must provide timely, complete, substantive and concrete answers, when the information provided by the consultant is sufficient and adequate, and point out the recommendations and action plans, which are mandatory for the areas and workers.


Patterns will be defined, actions aimed at continuous improvement of the process will be defined, and precedents will be identified by theme in order to strengthen the preventive approach.

Dilemmas and queries shall be submitted to the ethics line and the following steps shall be followed, as appropriate:

- **Registration** in the ethical line, by the user.
- **Transfer to the competent internal area:** When the matter should not be handled on the line, as indicated in this procedure.
- **Analysis of the attributes of the matter:** Taking into consideration its impact, credibility, complexity, security conditions and urgency.
- **Assignment of the professional:** Taking into account the characteristics of the matter, the experience, the profile of the members of the work teams, including their academic background and professional trajectory with respect to the topics of the matters previously assigned.
- **Adoption of preservation measures:** Such as custody requirements for relevant information, capture of company information stored in the different corporate physical or electronic media, securing the respective images, copying of information recorded in technological tools, or accounting records, among others, in accordance with the applicable regulations in force, the corporate technological tools available for such purpose, and taking into account the management of the applicable risks according to the measure adopted.
- **Extension of information:** When the consultation or dilemma does not contain the necessary information for its management, the professional will be able to make requests for complementation or extension to the petitioner. If no response is obtained or it is not sufficient, the matter will be closed as "Insufficient Information", indicating to the petitioner that he/she must make a new request with the necessary information to obtain a substantive response on the matter.
- **A substantive response to any query or dilemma:** Addressed to the sender, provided that the consultant has submitted all the information necessary for the respective analysis.
- **Closing of the case in the tool:** After uploading the response and the respective evidence.

The Ethics and Compliance Management will follow up on the closure actions recommended to the competent areas, and will provide the support required by said areas, whenever and wherever possible within the framework of its competence.



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### 3.3. Terms for deciding on the issues

- **High-impact reports or complaints** (under the jurisdiction of the CAUD President): 90 working days.
- **Prior validation of reports or complaints:** 5 business days.
- **Compliance reports or complaints:** (corruption, bribery, fraud, FCPA, SOX, ML/TF/ FPMDW, anti-competitive practices, harassment and sexual violence): 70 business days.
- **Ethical reports or complaints** (those that do not involve compliance typologies): 50 business days
- **Ethical or compliance reports – subordinates:** According to the number of reports received annually will have the following terms:
  - When the number of reports received in the last year exceeds 50, they will have a maximum term of 55 working days.
  - When the number of reports received in the last year is less than 50, they will have a maximum term of 30 working days.
- **Dilemmas and consultations:** 5 working days.

Extensions may be requested and authorized, indicating their objective, progress and justification. In the case of reports that must be prioritized, the terms may be reduced, according to the defined methodological plan.

The terms are counted from the next business day after the report is filed in the ethics hotline.


## 4. CONTINGENCIES

Not applicable.

### VERSION RATIO

Previous Document			
Version	Date mm/dd/yyyy	Document Code and Title	Changes
2	05/04/2015	Ethics and Compliance Management Procedure VEI-P-001.	The content of the Procedure is updated in accordance with the structure of the Corporate Compliance Department and its roles and responsibilities, the competent areas to hear the matters, the closing terms and the best practices applicable to the matter. The scope is extended to Ecopetrol's subordinates.
New Document			
Version	Date mm/dd/yyyy	Changes	
1	02/11/2025	A review is carried out by the Corporate Governance Management of the General Secretary's Office to verify the correct use of terminology and the definition of the scope of this document for the companies of the Ecopetrol Group according to the criteria set forth in the Corporate	



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	<b>CODE</b> <b>GEE-P-013</b>	<b>Drafted on</b> <b>02/14/2025</b>	<b>Version: 1</b>


		Governance Model. The content of the Procedure is updated in accordance with the structure of the Corporate Compliance Department and its roles and responsibilities, the areas competent to hear the matters, the closing terms and the best practices applicable to the matter.
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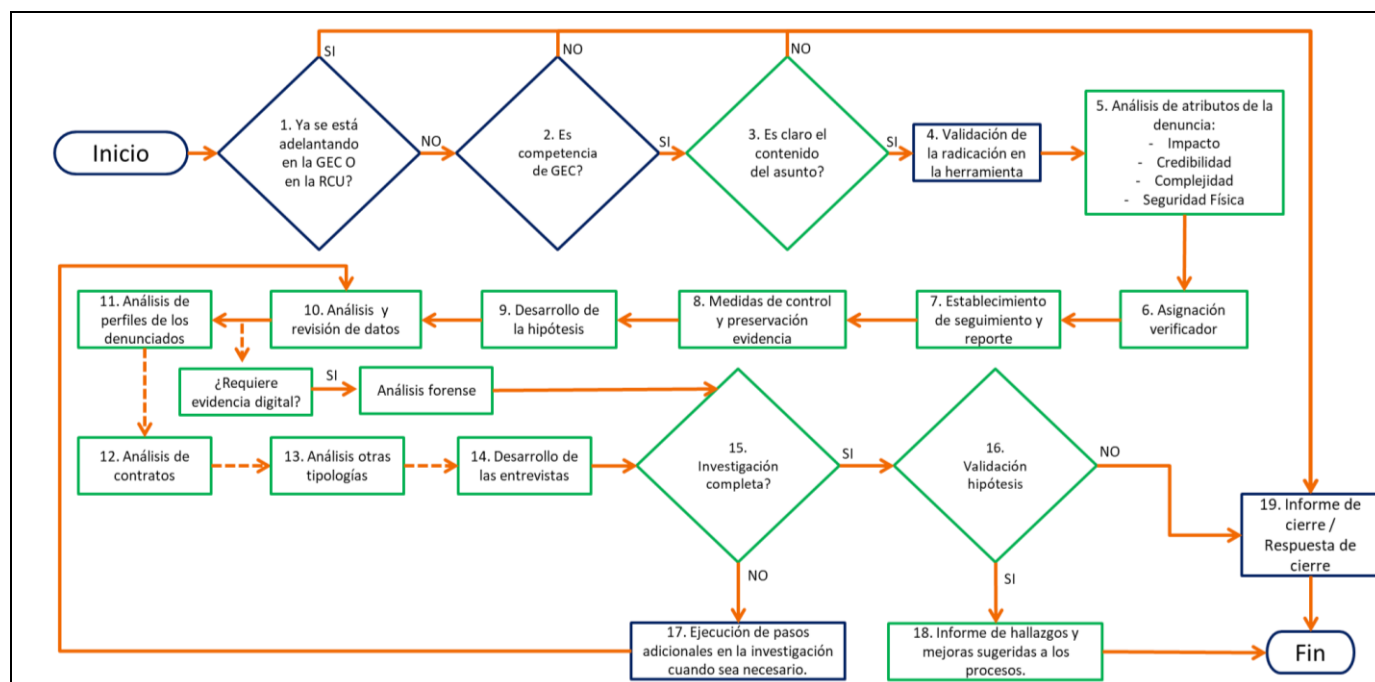
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<i>Electronically signed document, in accordance with the provisions of <b>Decree 2364 of 2012</b>, which regulates Article 7 of Law 527 of 1999, on electronic signature and other provisions.          To verify compliance with this mechanism, the system generates an <b>electronic report that evidences the traceability of</b> the review and approval <b>actions</b> by the responsible parties. If you need to verify this information, please request this report from the Service Desk.</i>	

## 5. ANNEX 1

### FLOWCHART

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Traducción de la gráfica:

## FLOWCHART

YES NO NO

## START

1. Is it already being conducted in the GEC or the RCU?
2. Is it of the competence of the GEC
3. Is the content of the matter clear?
4. Validation of the filing in the tool
5. Analysis of the attributes of the claim:
  - Impact
  - Credibility
  - Complexity
  - Physical Security
6. Assignment of Verifier
7. Establishment of follow-up and reporting
8. Measures for monitoring and preservation of evidence
9. Development of hypothesis
10. Data analysis and review
11. Analysis of profiles of those accused
12. Contracts analysis
13. Analysis of other typologies
14. Conduction of interviews
15. Is the investigation complete?
16. Validation of hypothesis

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17. Execution of additional steps in the investigation when necessary
18. Report on findings and improvements suggested for the processes

**END**