

	<b>Business and Human Rights Policy</b>		
	<b>Corporate Responsibility System</b> <b>Secretary General &amp; Assistant to the President</b>		
	<b>Code</b> <b>SRC-G-002</b>	<b>Created</b> <b>28/06/2019</b>	<b>Version: 1</b>

## 1. PURPOSE

To establish the main elements of the management of the Human Rights (HRs) for the Ecopetrol Group (EG), in accordance with national and international standards, as well as requirements and expectations from companies on this matter.

## 2. DEVELOPMENT

### A. CORPORATE RESPONSIBILITY SYSTEM

The Corporate Responsibility System (CRS) guides the behavior of the EG, considering stakeholders' changing expectations, best practices and international standards of corporate responsibility. This is done with the purpose of leveraging the achievement of the company's objectives and behavior based on:

- **Corporate integrity:** coherence between the company's statements, commitments, and practices.
- **Human rights:** respect and promotion of HR, based on the due diligence principle.
- **Sustainable development:** materialization of the company's contribution to sustainable development.

Accordingly, Ecopetrol explicitly recognizes its commitment to respect HRs, guiding its corporate performance on the following international standards: (i) UN Guiding Principles on Business and Human Rights, (ii) the Ten Principles of the United Nations Global Compact, (iii) the ILO Declaration on Fundamental Principles and Rights at Work, and (iv) the Voluntary Principles on Security and Human Rights.

Ecopetrol's commitment to respect HRs extends to all internationally recognized rights; however, within its operational framework and management of its HRs, the company grants special consideration for these rights and liberties:

- ∩ Right to life
- ∩ Right to integrity of the person
- ∩ Right to liberty
- ∩ Freedom of association and the right to collective bargaining
- ∩ Right to dignified, favorable, and appropriate working conditions
- ∩ Rights of the Child
- ∩ Right to equality and non-discrimination in employment or occupation
- ∩ Right to freedom of expression
- ∩ Right to information
- ∩ Ethnic groups' right to participate through prior consultation
- ∩ Collective and environmental rights

### B. PRINCIPLES ON MANAGEMENT OF HUMAN RIGHTS

The guiding principles of Ecopetrol's management of HRs management:

- **Human Rights Due Diligence:** Ecopetrol identifies apparent or real risks and impacts related to HRs caused by company activities or environmental conditions to avoid, mitigate, and repair them, in the event they materialize.
- **Continuous improvement:** Monitoring and self-assessment are key elements for the improvement on how HRs are managed in Ecopetrol. The criteria, which includes objectives,

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plans, and indicators, is jointly defined with different areas who are responsible of the HRs relevant affairs within the company.

- **Transversality:** The respect for HRs is a commitment of the entire company, which must be carried out with its seven stakeholder groups, as well as shown through the responsible area's performance, as detailed within their corporately defined functions.
- **Complementarity:** Ecopetrol recognizes that the roles and powers of the Colombian State regarding HRs differ from those of the Company. The Company also recognizes the States' obligation to respect, guarantee, and protect HRs, as well as companies' responsibilities to respect and to repair them when affected.
- **Collaborative working:** Ecopetrol aims at articulating its HRs management policy with the HRs policies of public and private entities as well as with policies of other relevant actors.

### C. IMPLEMENTATION

#### a. Strategy and addressing

The Secretary General (SEG), through its Corporate Responsibility Department (CRD) and its mandate to use and implement the CRS and the Corporate Responsibility Strategy, provides strategic direction in HRs issues.

##### (i) Human Rights Guidelines

The CRD is in charge of preparing and updating periodically, or whenever required, Ecopetrol's documents and policies related to HRs. Ecopetrol's documents that develop related subjects must be coherent with the definitions of this guideline. The General Secretary reviews and approves the HRs guidelines.

For the EG, the CRD will promote the adoption of the international standards mentioned in section B and will direct its implementation.

#### b. Operations

##### (i) Consultation of perceptions and analysis of stakeholder expectations

The CRD periodically applies the HRs module in the stakeholders' perceptions and expectations study, in order to identify the expectations in this area and to manage them in a way that is consistent with the commitment to respect them. The result of this exercise serves as an input for the elaboration of the Human Rights Plan (HRP) and for carrying out the HRs risks analyses.

##### (ii) Annual Human Rights Plan

To ensure that Ecopetrol properly manages HRs issues, the CRD will prepare an annual Human Rights Plan. The Plan will be part of the management instruments used within the CRS.

This Plan will incorporate the actions defined with the areas in charge of managing relevant HRs issues; these areas will be responsible for implementing the Plan and for reporting on its progress. The Plan may incorporate actions which apply to the GE and guide the management of HRs of the Group's companies. Likewise, the Plan shall include cross-cutting actions of instruction, communication, and monitoring.

In preparing the Human Rights Plan, the results of the surveys carried out during the stakeholder

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perceptions and expectations study (HRs module), the risk analysis, the performance evaluations of contractors, the consolidated reports on petitions, complaints, and claims, as well as the legal actions and complaints related to HRs issues, will be taken into account. Furthermore, normative changes, public policies and good practices, among others, will be considered for this purpose.

(iii) Monitoring

The CRD periodically monitors the development of those risks identified in the HRs risk analysis, as well as the petitions, complaints, and claims related to HRs issues, which are received by Ecopetrol's Office of Citizen Participation.

If necessary, the SEG will create proper alerts to prevent or mitigate HRs risks. Additionally, this area will analyze the pertinence of a public statement regarding alleged violations of HRs that involve the company's stakeholders in some way.

(iv) Supervision and evaluation

Ecopetrol has an indicator to supervise and evaluate HRP compliance. The CRD oversees and reports on this indicator on a quarterly basis.

(v) Mechanisms for Operational Remediation

Ecopetrol has various mechanisms for the reception of petitions, complaints, and claims, which allows the company to respond in a timely, transparent, and efficient manner to the requests of those who consider themselves affected in their HRs by Ecopetrol's operations and decisions. The primary mechanisms are the Office of Citizen Participation and Ecopetrol's Ethical Line.

Ecopetrol recognizes that providing access to these mechanisms to those who consider themselves affected is neither a limiting condition nor an obstacle to resort to official mechanisms established by the national authorities to attend their requests, complaints, and claims.

In the events Ecopetrol identifies that it has caused or contributed to adverse impacts on the HRs of any individual, the company will provide and reasonably cooperate in their remediation through its existing operational mechanisms or any other legitimate process.

For the EG, the CRD will guide and recommend the adoption of standards and good practices related to operational remediation mechanisms.

(vi) Reporting

The CRD compiles and elaborates the HRs Chapter of Ecopetrol's Annual Integrated Sustainable Management Report which promotes the use of the *Global Reporting Initiative* (GRI) standard for reporting the EGs HRs issues.

**D. SCOPE**

These guidelines apply to our employees.

Ecopetrol and the Group's companies will promote, among their contractors and employees, the respect for HRs as well as the implementation of good practices within them.

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Within the framework of its relations with partners and public entities, Ecopetrol promotes respect for HRs and does everything reasonably possible to prevent or mitigate negative impacts on HRs.

Ecopetrol gives the strategic direction towards responsible HRs management, promoting continuous improvement within them to all companies of the Ecopetrol Group.

### VERSION LIST

Previous Document			
Version	Date	Document Code and Title	Changes
1	29/05/2013	GRG-D-001, Human Rights Directive	<ul style="list-style-type: none"> <li>The document is adjusted according to the document management guidelines.</li> <li>The documentary type changes to Directive</li> <li>New terms defined in the glossary are included.</li> <li>Each phase for the implementation of the guideline is described in detail.</li> <li>A section of roles and responsibilities is included.</li> <li>The outline of the Human Rights Management model is included.</li> </ul>
New Document			
Version	Date	Changes	
1	28/06/2019	<ul style="list-style-type: none"> <li>The document is harmonized with the Corporate Responsibility System Guide, part of Ecopetrol's Management System.</li> <li>The code and version is updated according to the new system</li> <li>The international standards applicable to the human rights management of Ecopetrol are reviewed.</li> <li>Principles for human rights management are included.</li> <li>The scope of the document is extended to the Ecopetrol Group.</li> </ul>	

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*Document signed electronically under the provisions of Decree 2364 of 2012, which regulates Article 7 of Law 527 of 1999 on electronic signatures and other provisions. To verify compliance with this mechanism, the system generates an electronic report that evidences the traceability of review and approval actions by those responsible. If you need to verify this information, request this report to Service Desk.*