

REPORTING ON BREACHES TO THE CODE OF CONDUCT 2024¹

| Conduct Category /Area | Total Reported Incidents ² | Reports Closed Resulting in No Violation | Reports Currently Being Investigated | Reports Closed Resulting in a Violation ³ |
|---|---------------------------------------|--|--------------------------------------|--|
| Corruption or Bribery ⁴ | 14 | 4 | 10 | 0 ⁵ |
| Discrimination or Sexual harassment | 10 | 3 | 6 | 1 ⁶ |
| Customer Privacy Data | 0 ⁷ | 0 | 0 | 0 |
| Conflict of Interests | 72 | 32 | 20 | 22 |
| Money Laundering or Insider Trading Dealing | 0 ⁷ | 0 | 0 | 0 |
| Loss of Confidential Information | 52 | 20 | 14 | 20 ⁸ |
| Theft | 11 | 4 | 4 | 2 |
| Antitrust / Anticompetitive Practices | 2 | 1 | 1 | 1 ⁹ |
| Environment, Health, and Safety | 9 | 5 | 4 | 0 |
| Disrespect, Mistreatment or Hostile Environment | 103 | 43 | 47 | 13 |
| Breach of Rules and Procedures ¹⁰ | 266 | 80 | 134 | 48 |
| Other Case Typologies ¹¹ | 20 | 4 | 15 | 1 |
| TOTAL | 559 | 196 | 255 | 108 |

1 No investigations were communicated or conducted by external authorities in 2024.

2 The numbers that are shown in this column reflects the initial assigned category according to the information given in the report. This includes reports received in 2024 and those that were under investigation on January 1, 2024.

3 Some reports were reclassified in another category during investigation according to the information collected: (i) 3 of the 22 breaches of “Conflict of interests” were initially classified in the following categories: 2 as “Breach of Rules and Procedures” and 1 as “Loss of Confidential Information”; (ii) 4 of the 20 breaches of “Loss of Confidential Information” were initially classified in the following categories: 3 as “Breach of Rules and Procedures” and 1 as “Conflict of interests”; (iii) 2 of the 48 breaches of “Breach of Rules and Procedures” were initially classified in the following categories: 1 as “Loss of Confidential Information” and 1 as “Theft”; (iv) 1 breach of “Antitrust / Anticompetitive Practices” was initially classified as “Breach of Rules and Procedures”.

4 Corruption defined as the will to act dishonestly by abusing the power or trust entrusted by Ecopetrol to obtain personal benefits, either directly or indirectly and/or favoring third parties against the company's interests. Corruption includes bribery practices.

5 During 2024 there were no breaches regarding bribery and corruption.

6 The Report corresponded to sexual harassment, not to discrimination.

7 During 2024, Ecopetrol did not received reports related to: i) money laundering, ii) insider trading / dealing, iii) customers privacy data.

8 These breaches were related to the loss of corporate confidential information.

9 The risk of antitrust or anticompetitive practices did not materialize.

10 This category includes any failure to comply with Ecopetrol’s internal regulation and procedures.

11 “Others Case Typologies” grouped other matters different from the ones required on the chart.

ACTIONS TAKEN WITH RESPECT TO THE CONFIRMED BREACHES¹

| Conduct Category / Area | Confirmed Breaches | Corrective Actions | | | | Preventive Actions | | | | | |
|---|--------------------|--|---|---|--|----------------------------------|--|----------------------------------|--|--|---|
| | | Notification to the Vice presidency of Human Talent of | Notification to the Attorney General's Office | Notification to the Disciplinary Control Management | Notification to the Vice presidency of Legal Affairs | Reports to the UIAF ² | Notification to the Assurance of Risks and Internal Control Management | Preventive Ethical Conversations | Notification to the Vice presidency of Administration and Services | Notification to other areas of the company or to subsidiary companies for preventive actions | Notification to the contract administrat or |
| Corruption or Bribery | 0 | - | - | - | - | - | - | - | - | - | - |
| Discrimination or Sexual harassment | 1 | - | - | - | - | - | - | - | - | 1 | - |
| Customer Privacy Data | 0 | - | - | - | - | - | - | - | - | - | - |
| Conflict of Interests | 22 | 5 | 2 | 14 | 9 | 1 | 3 | 6 | 1 | 7 | 3 |
| Money Laundering or Insider trading Dealing | 0 | - | - | - | - | - | - | - | - | - | - |
| Loss of Confidential information | 20 | - | 2 | 7 | 2 | 2 | 8 | 10 | 1 | 2 | 3 |
| Theft | 2 | 1 | 2 | 2 | 1 | - | 1 | - | 1 | - | - |
| Antitrust / Anticompetitive Practices | 1 | - | - | 1 | - | - | - | - | - | - | - |
| Environment, Health and Safety | 0 | - | - | - | - | - | - | - | - | - | - |
| Disrespect, Mistreatment or Hostile Environment | 13 | 1 | - | 1 | - | - | - | 8 | - | 1 | - |
| Breach of Rules and Procedures | 48 | 3 | 3 | 26 | 4 | 1 | 7 | 18 | 8 | 9 | |
| Other Case Typologies | 1 | - | - | 1 | - | 1 | - | - | - | - | - |
| TOTAL | 108 | 10 | 9 | 52 | 16 | 5 | 19 | 42 | 11 | 20 | 6 |

¹ Please note that a single case may involve one or more actions, depending on the number of people investigated and the category of the conduct.

² The Financial Information and Analysis Unit (UIAF) is an economic and financial intelligence agency of the Colombian Government, that centralizes, systematizes, and analyzes the information provided by reporting entities and open sources, to prevent and detect possible money laundering operations, its source crimes, and the financing of terrorism.