

# **OUR CODE OF Ethics and Conduct**





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***Board of Directors***

Felipe Bayón Pardo  
***CEO***

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# Board of Directors Statement

At Ecopetrol S.A., its Business Group and the Board of Directors, we consider ethics and transparency are fundamental pillars of our business. This Code reflects this orientation and aims to serve as a guide to maintain the highest level of integrity, respect, responsibility and commitment to life.

Therefore, it is essential that all employees, their beneficiaries, suppliers, contractors, partners and customers act and perform their functions and activities in accordance with this Code and the regulations that govern us.

We should all keep in mind that the way we act reflects who we are, not only as individuals but also as a related party with Ecopetrol and its Group, and that the conduct of the recipients of this Code directly impacts the reputation and quality of our operations. We have managed to consolidate ourselves as solid, profitable companies geared towards local and international recognition for our good practices as regards ethics and compliance; hence, we rely on each of you to maintain and enhance our reputation through the execution of specific actions defined herein.

Let us encourage permanent reference to this Code and its use as a tool aimed at eradicating any form of violation of ethics and bad practices, including corruption, bribery, fraud, money laundering, terrorist financing and ignorance of the local and international regulations that govern us. The Board of Directors invites you to fulfill the zero tolerance promise relative to the aforementioned actions and to report, through the institutional channels, any suspicious facts or activities that ignore the guidelines set out in this Code.

**Thanks for your cooperation and commitment.**

# Message from our Chief Executive Officer

This Code of Ethics and Conduct is the main guide for our actions and defines the manner in which we must act to perform our assigned functions and activities. Therefore, it is essential that each of us review, understand and comply with the guidelines established therein.

The Company has made this update to state, in a general manner and without limitation, the rules of conduct that must be applied at work and personal environments, to protect the image of Ecopetrol and its Group. It also states the roles and responsibilities of the recipients, matters related to conflict of interest and ethical conflict, compliance with the law and internal regulations, provisions on bribery, corruption, fraud, money laundering, terrorist financing, Foreign Corrupt Practices Act - FCPA, gifts, entertainment and hospitality, as well as the general procedures of the reporting process. Likewise, some frequent questions are included to guide the reader in everyday situations that may breach ethical principles. Therefore, this update of the Code integrates several elements that are to be considered to prevent events that do not fulfill the principles of integrity, responsibility, respect and commitment to life.

By adhering to our corporate ethical rules, each one of us becomes a protagonist with respect to the fulfillment of our challenges and contributes materially to the success of the organization. Let's not forget that we all have an important role in the goal of exceeding the expectations of our stakeholders.

The principles of the Code of Ethics and Conduct and its guidelines are not far from the common sense that we use in our own lives, but they must be even more rigorous. To ensure such rigor, I invite you to ask for help in case of doubt. At Ecopetrol and its Group, we have created a corporate structure with sections and workers to guide us on issues related to the ethics and compliance program, address queries and dilemmas, and manage complaints related to alleged violation of ethical principles.

I commit and require your commitment to comply with our Code of Ethics and Conduct so that we may continue demonstrating that Ecopetrol, besides being the largest company in Colombia, is also the most transparent. **We produce clean, efficient and ethical barrels.**

**I rely on you to achieve these goals.  
Remember, being ethical, we are Ecopetrol!**

**FELIPE BAYÓN PARDO**

## What is the Code of Ethics and Conduct?

It is a set of rules that define the standards of conduct expected by the organization and guide the actions of Ecopetrol S.A., of the Group companies, and of all the recipients of the Code, pursuant to the ethical principles of integrity, responsibility, respect and commitment to life.

Having this instrument constitutes a business purpose and a responsible personal commitment, thus contributing to a prestigious image, with a culture based on superior conduct principles

## To whom does this Code apply?

This Code is intended for the members of the Board of Directors and employees of Ecopetrol S.A. and its Group, all individuals or legal entities that have any relationship with it, including beneficiaries, shareholders, contractors, suppliers, agents, partners, customers, allies and suppliers, in addition to the personnel and companies that the contractors engage for the execution of the agreed activities.

Therefore, the knowledge and application of this Code will be mandatory for its recipients, who must ensure that their actions are always framed within its rules.

The Group companies must adopt the rules set out in this Code and assure their dissemination and application.

*\* The references made hereunder to Ecopetrol, company, business, or similar correspond to Ecopetrol S.A. as well as to the affiliates and subsidiaries that make up the Business Group.*

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This Code does not intend to resolve or define every behavior, but it is a guide for our actions and responsible decision making.

***Compliance Corporate  
Vice Presidency***

***Ecopetrol S.A.***

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Recipients of our Code of Ethics and Conduct: before acting, we must review the principles and behaviors of this set of rules. If the decision does not match the ethical guidelines established herein or in any way deviates from them, you must abstain from taking it, and define other options in accordance with our corporate principles.

***FELIPE BAYÓN PARDO  
CEO – Ecopetrol S.A.***

## **What are the Responsibilities of the recipients?**

- To know and embrace the information contained in the Code and promoting similar actions among other recipients.
- To subscribe documents, certifications or statements defined by Ecopetrol stating knowledge and commitment to the Code, and that its provisions have not been infringed.
- To act in accordance with the principles of integrity, responsibility, respect and commitment to life.
- To accept the regulations that govern our activities as well as that related to the prevention of money laundering, terrorist financing, fraud, bribery and corruption, and others that regulate the ethical and compliance risks set forth in this Code.
- To raise any queries, dilemmas and complaints related to the Code of Ethics and Conduct.
- To cooperate in internal or external investigations aimed at verifying possible violations of this Code.

## **What are the responsibilities of the leaders?**

- To lead by example in accordance with the Code principles.
- To expressly communicate to their work teams the obligation of abiding by the ethical principles and regulations set out by Ecopetrol for the performance of their work responsibilities.
- To conduct periodic actions with the members of their work teams to encourage embracing of the Code in their section activities.
- To monitor management, verifying the application of the Code principles and company internal controls, which are based on the need to mitigate business risks.
- To abstain from applying retaliation against those who file complaints for alleged violations of the Code.
- Zero tolerance for behaviors that breach the principles or applicable regulations.
- To allow and promote reporting of queries, dilemmas and complaints.
- To disseminate and ensure the application of internal regulations regarding compliance risks.

# **Ethical principles of Ecopetrol and its Business Group**

The following principles are rules of the organization that constitute a source of responsibility and guide the expected conduct of the recipients of this Code:

## **INTEGRITY**

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

## **RESPONSIBILITY**

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

## **RESPECT**

It is the ability to accept and recognize differences with others. Based on this principle, fundamental and social human rights are protected, while encouraging recognizing others without distinction of gender, orientation, race, nationality or family origin, language, religion, political or philosophical opinion, economic, physical or mental conditions. By virtue of this principle, one acts in a cordial manner without making any discrimination or mistreating or attacking others, not speaking ill of others, nor affecting the image of the people or the Company.

## **COMMITMENT TO LIFE**

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

# **Compliance with the law and internal regulations**

Ecopetrol and its Business Group comply with the provisions that are applicable to it, contained in the Political Constitution, the local and international laws, and its internal regulations. This includes, without limitation, laws, decrees, procedures, manuals, guides, instructions and other formal guidelines. In particular, internal control provisions, fight against money laundering, terrorist financing, fraud, bribery and corruption and others that regulate the mitigation of compliance risks are accepted.



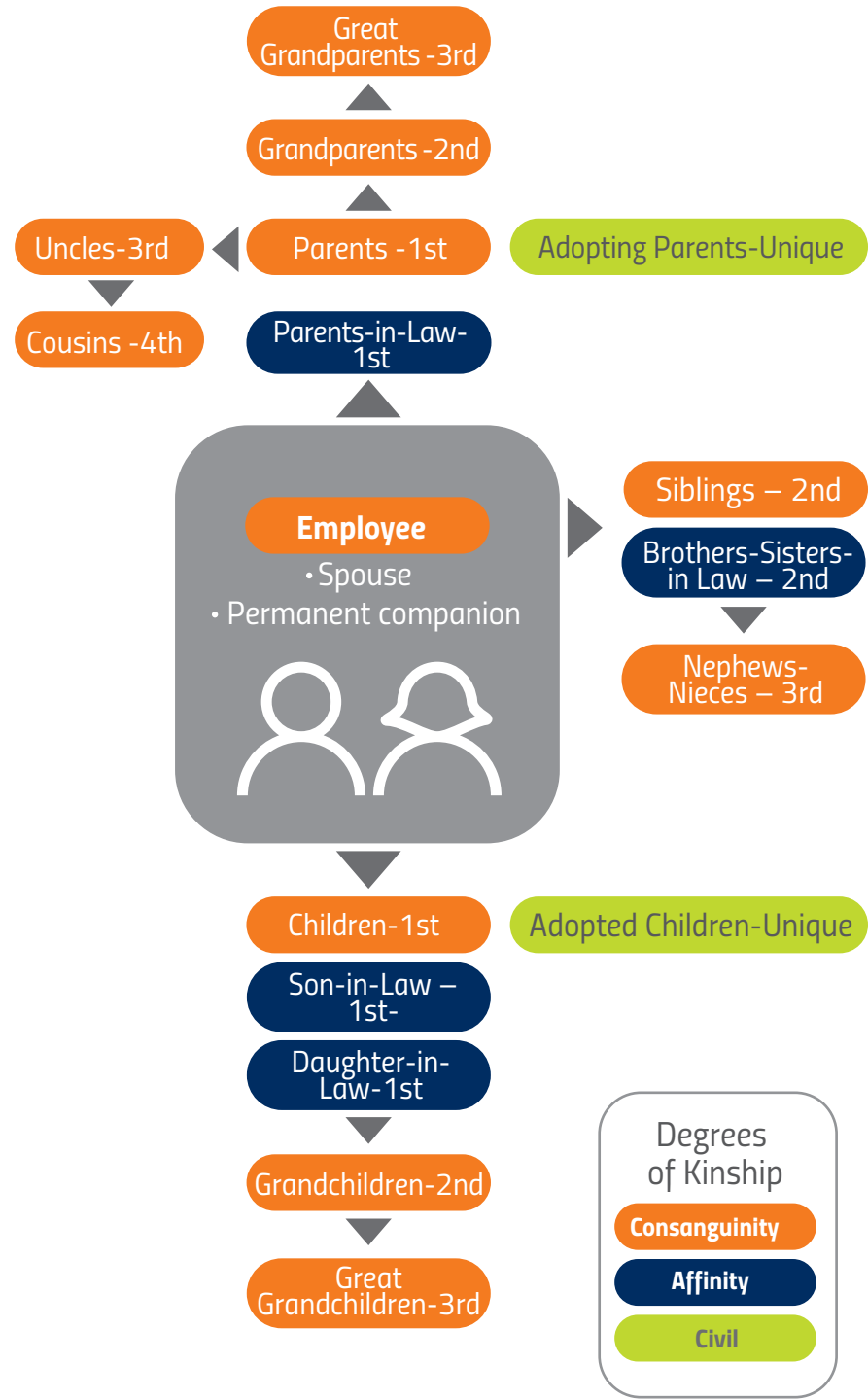
# Conflict of Interest

Corresponds to the performance of public servants in matters in which they have a particular and direct interest in its regulation, management, control or decision, or that could be related to their spouse, permanent companion, or one of its relatives within the fourth degree of consanguinity, second of affinity or first civil, or its partner or partners of fact or law, in accordance with the provisions of article 40 of Law 734 of 2002.

# Ethical conflict

Ecopetrol, pursuant to its internal regulations, also considers an ethical conflict that violates the principle of integrity, any act or circumstance that may imply a conflict of interest or that impairs the objectivity, equity, independence or impartiality, because the private interest or decision-making may prevail for own or third party benefit and/or to the detriment of the interests of the Company.

Conflicts of interest and ethical conflicts are typologies of acts of corruption.



**What to do if, as a public servant, I have a conflict of interest (pursuant to the terms of Law 734 of 2002) or if, as a recipient of this Code, I am involved in circumstances that may affect the objectivity, independence or impartiality in the management of matters in which I participate (ethical conflict)?**

In both cases, you must report such situation to your immediate supervisor in writing and send a copy to the Ethics and Compliance Officer of Ecopetrol S.A. or the Compliance Officer of the respective company, while withdrawing from the respective procedure or management, in accordance with internal procedures. If you have a doubt about any circumstance that may configure the aforementioned cases, you should consult with the ethics hotline.

We should keep in mind that there is a regime of inabilities, incompatibilities and prohibitions applicable to current or former public servants and/or interested in contracting with public entities, which contains a number of limitations for hiring or employment. Ignoring them constitutes a violation of this Code.

## Prohibition of bribery

Bribery is an offer or proposal of payment in cash or offering any object of value, such as products or services in kind, an offer, a plan or a promise to pay something (even in the future), directly or indirectly, in exchange for an undue personal benefit, of a third party or for the company.

### **Bribery is not related only to money!**

**Do not allow yourself to be bribed with travel expenses, gifts, entertainment, hospitality or benefits for members of your family, services, courtesy favors, scholarships, internship and sponsorship, payments to local officials disguised as social or environmental development contributions, and payments to members of the police or military forces also disguised as contributions, etc.**

It should be noted that the Foreign Corrupt Practices Act - FCPA, to which we are subject as a company that is registered in the stock market of the United States of America, whose fulfillment we are committed to, establishes that it is a crime to pay or offer anything of value, directly or indirectly, to a non-US public servant, to obtain or retain business or to be given an improper business advantage, under penalty of pertinent sanctions by the U.S. Department of Justice - DOJ and the U.S. Securities and Exchange Commission - SEC. These same prohibitions, among others, are contained in Law 1778 of 2016, and are investigated and sanctioned by the Superintendence of Companies, as well as by the different local control bodies.

**Did you know that the FCPA, in addition to containing prohibitions of transnational bribery, provides for compliance with internal controls, especially in terms of adequate bookkeeping and accounting of all monetary transactions, under penalty of sanction by the U.S. Securities Exchange Commission - SEC?**

Each worker at Ecopetrol is part of the Internal Control System; therefore, it is critical that they comply strictly with the controls for which they are accountable, in such manner that the accuracy of the financial statements can be certified against auditors and government authorities in Colombia and abroad.

### WHAT SHOULD YOU DO?

To avoid risks of violation of the FCPA, you must ensure: **(1)** That you have complied with the due diligence processes; **(2)** That there is a signed contract, which expressly describes the services rendered or goods acquired, the obligations, the amount, form of payment and accounts for which such payment may be received; **(3)** That the agreement or contractual document contains ethics and compliance clauses; **(4)** That the third party, its workers and/or subcontractors understand and commit to comply with the applicable local and foreign anti-bribery and anti-corruption laws, as well as with the guidelines and principles of this Code of Ethics and Conduct; **(5)** That every invoice clearly reflects the services rendered or goods acquired and that the approval and payment thereof complies with the internal controls of Ecopetrol.

### WHAT SHOULD YOU DO?

All transactions must be performed according to pertinent procedures and empowerment, and be registered accurately and correctly in the books.

Specifically, as an employee of Ecopetrol, you must ensure that the accounting information is based on the following guidelines:

- Comply with internal controls.
- Have complete and detailed information of the transaction.
- The transaction is authorized in due form and accurately recorded in the respective books or systems.
- The access to and management of Ecopetrol resources, assets and records are limited to authorized personnel.
- The registered assets are compared with the frequency required in the internal regulations, to remedy the respective discrepancies.

## Integrity of accounting

Ecopetrol has an Internal Control System that, as regards accounting matters, ensures that the assets of the company are managed and administered in due form and that, with reasonable detail, they reflect in an accurate, correct manner the transactions and disposal of company assets.

# Warning signs

- Difficulty in obtaining or verifying information from a counterpart.
- Inconsistency between the information provided by the counterpart and information from other sources.
- Counterpart activity that has no obvious commercial justification or seems strange in a normal business context.
- Counterpart presence in a country classified as non-cooperating in the fight against money laundering and terrorist financing.
- Transactions that seem to be structured to evade requirements.

## We act against money laundering and terrorist financing (AML/CTF)

These are facts that violate the principles of integrity and accountability of the Code of Ethics and Conduct as they are means that facilitate transactions that support the concealment or use of monies of criminal or terrorist origin. Therefore, it is prohibited to accept funds or make transactions knowingly or with the suspicion that they come from an illegal activity.

### WHAT IS MONEY LAUNDERING?

It is the process by which the revenues derived from illegal activities are moved through legitimate businesses and the global banking system to eliminate or hide their source. It includes activities to acquire, protect, invest, transport, transform, guard or administer goods of an illicit origin.

It is pertinent to bear in mind that in the event that Ecopetrol or its employees participate in a transaction with a third party involved in an improper payment, they can be held liable even if they are not the direct authorizers of the improper payment.

### WHAT IS TERRORIST FINANCING?

It means actions of collection, provision, delivery, receipt, administration, contribution, or custody of funds or assets or resources, whose purpose is the promotion, organization, support, maintenance, financing or support of groups outside the law, terrorists, or organized crime. For the terrorist financing to be configured, it is not required that the facilitation resources have been obtained illegally.

### WHAT SHOULD YOU DO?

It is necessary to carefully evaluate every financial transaction in which Ecopetrol participates, being imperative to perform due diligence on any counterpart to ensure that it is not included in restrictive lists and that there is no other warning signal.

Ecopetrol must comply with the sanctions and economic restrictions imposed by the Office of Foreign Assets Control (OFAC) of the U.S. Treasury Department, which contain prohibitions or limitations on business and transactions with certain countries, including individuals and entities, so their analysis is essential before subscribing to any agreement.

Consequently, you should consult Ecopetrol regulations on money laundering, terrorist financing and due diligence.

## Gifts, entertainment and hospitality

Ecopetrol workers are not authorized to give, offer, demand, request or accept gifts, courtesies, meals, trips or other benefits outside the parameters defined in its internal regulations. This prohibition extends to the family members of the worker and counterparts. Therefore, it is mandatory to know and apply the pertinent provisions.

Ecopetrol recognizes that there may be situations in which it is culturally appropriate to accept or give gifts or other forms of entertainment to a client or provider. However, this practice is considered high risk pursuant to anti-corruption laws; therefore, the guidelines set forth in the internal regulations must be strictly followed. In general, in every case, as regards the receiving or offering of gifts, entertainment and hospitality, the following aspects should be analyzed:

- Is it directly related to a promotional activity and is it moderate?

- Is it reasonable, consistent with what is customary, appropriate in nature and according to the occasion on which it is offered, and to the position and circumstances of the recipient in the specific context (such as gifts of a promotional nature that are identified with the name of a brand, service or product of an organization)?
- Is it allowed by Colombian law and that of each country where the activity occurs, and by internal regulations?
- Has it been received or granted in a transparent manner, with no intention to hide it and in accordance with usual business practices?
- Is there any reasonable chance of its being considered in some way or having the appearance of a bribe, a facilitation payment or an improper payment?
- Has it been supported with accurate and adequate documentation?
- Was it registered and/or correctly reported in the systems or information formats that are established according to internal procedures?

In any event, **it is prohibited** that the reception or granting of gifts, entertainment and hospitality or other benefits:

- Be intended to influence any type of decision or to obtain an inappropriate advantage.
- Generate a sense of obligation or commitment for the receiver.

- Be luxurious, excessive or frequent.
- Be offered or given to family members of a worker, contractor, partner, ally, customer or supplier.
- Be cash or a commercial instrument convertible into cash (titles, securities, gift cards, letters of credit, bills of exchange, etc.).
- Be requested by an employee of Ecopetrol to direct a benefit or advantage, or given to someone who offers a benefit or advantage to Ecopetrol.
- Be requested or delivered to a worker of Ecopetrol in exchange for fulfilling an obligation that legally or functionally is his responsibility.

**If you are not sure about receiving gifts, entertainment and hospitality, you should consult the ethics hotline for guidance.**

## **Protection and use of Ecopetrol resources**

In Ecopetrol it is encouraged to avoid the misuse of resources owned by the company, including physical assets, information, and intellectual property. Inadequate practices may include:

- Personal and excessive use of information technology services, systems and equipment.
- Personal use of equipment or office supplies.
- Disclosure of company information.
- Processing, use or improper obtaining of benefits.

- Subtraction of the above in any way.
- Inadequate use of the goods or services delivered.
- Fail to protect the integrity of company equipment.
- Enter into contracts for goods or services that are not required.
- Payment of goods or services not received or that do not meet the technical specifications.
- Purchase or contract of services for amounts that do not match the real market prices.

## **Information management and security**

Ecopetrol gives appropriate use to personal and sensitive data, while protecting the information it registers in its databases, in accordance with the legal provisions that regulate the subject as applicable, especially the Statutory Law for the Protection of Personal Data, the Transparency Law and others that may modify them. Any collaborator who manages or acquires access to personal information must protect it and may only share it in accordance with applicable rules.

**The laws governing the use of personally identifiable information may vary. If you are not sure or do not know the regulations, you should consult the pertinent area for guidance.**

Similarly, every worker has the responsibility to protect the information and technological resources provided by Ecopetrol (electronic addresses, internet access, computers, mobile devices, etc.), which are uniquely

and exclusively intended for the performance of their functions and/or tasks, and should not be used for other purposes, in accordance with internal regulations.

The disclosure of reserved or classified information of the company by any means is prohibited, except for legal obligation or requirement of a competent authority. Likewise, it is prohibited to use institutional information for personal purposes or for the benefit of a third party.

Ecopetrol, as the owner of the information contained in the equipment, devices and servers that it assigns to its collaborators, can, through the control or compliance areas, ensure, access, capture, review, treat, transfer, use or monitor, at any time, the information that is created, generated, managed, guarded, sent, received or stored in said equipment, mobile devices and servers, for institutional purposes.

For further details about the obligations of Ecopetrol employees, consult the handbooks, procedures, guides and instructions relative to the information security issues and proper handling of email and social networks, as well as other internal regulations related to information management.

At Ecopetrol, personal data is treated according to the parameters and principles established in Law 1581 of 2012, its regulatory standards and others that modify and/or complement them.

Further, we have a Treatment of Personal Information Statement, which is available in the corporate responsibility section of our website

**[www.ecopetrol.com.co](http://www.ecopetrol.com.co)**

## **Act with social responsibility and respect for Human Rights**

The success of Ecopetrol is based on the generation of constructive, dynamic and reliable relationships with its counterparts and stakeholders. These relationships grow and prosper through mutual care, understanding and respect.

Likewise, Ecopetrol carries out actions of understanding and support for the development of the communities that are considered allies of management, recognizing the human rights of the stakeholders.

In particular, the principles of respect and commitment to life commit the company to guarantee the defense and promotion of human rights, to prevent discrimination, and to comply with the HSE norms. Furthermore, this Code requires compliance with the law, which means that the company is committed to abide by applicable local and international regulations regarding fair labor practices and human rights, including prohibition of forced or child labor.

In that sense, Ecopetrol has voluntarily signed the Global Compact of the United Nations, an initiative that promotes the commitment of the private and public sector and the civil society to align their strategies and operations with ten principles that are accepted universally on four thematic areas: human rights, labor standards, environment and anti-corruption. The UN Global Compact is considered an action framework that facilitates the social legitimization of businesses and markets. Adhering organizations share the conviction that business practices, based on universal principles,



contribute to the generation of a more stable, equitable and inclusive global market thus promoting more prosperous societies.

These principles and regulations reflect the commitment to prevent and, when necessary, remedy the negative impacts generated by the operation on human rights. Similarly, they ensure the effective identification of risks associated with human rights in operations, with the purpose of continuously improving processes. To such end, we must undertake due diligence actions, get involved with our stakeholders, and communicate our expectations to our business partners.

Ecopetrol is also committed to take actions to protect the environment in the places where it operates. This includes the reduction of emissions and waste management, applying all environmental policies, standards, procedures and applicable laws and regulations.

The company prioritizes safety at work and in the environment, to protect the integrity of people, facilities and areas where operations are performed. Therefore, it is imperative to stop any work considered unsafe or harmful, without fear of reprisal.

## **Report any event that infringes this Code!**

If you know or suspect of a situation that involves a worker or recipient of this Code and that leads to its violation, you are required to report the matter in the ethics hotline:

**<http://lineaetica.ecopetrol.com.co>**

## **HOW SHOULD YOU REPORT?**

Any complaint must be reported immediately, in good faith and in sufficient detail to allow the company to perform a verification and provide an effective response. Therefore, when reporting, keep in mind the following:

- You can report the situation anonymously to the ethics hotline and the information in the report will be treated confidentially.
- It must indicate the conditions of the way, time and place of the events.
- The report, the identification of the complainant, the material, elements and evidence collected in the process are confidential, unless the matter should be transferred to the competent authorities for decision making, or if there is a requirement issued by a competent authority, or if it is necessary to reveal information to carry out a thorough verification.
- Be willing to cooperate with the management of reported issues, responding to requests for further information through the tool or contact provided by the complainant, and providing the required evidence.
- It is an obligation to respect the human dignity and the good name of the accused parties; therefore, no accusations can be made that are not true or are intended for revenge or retaliation. It should be borne in mind that reporting an issue knowing that it does not correspond to reality constitutes a violation of integrity and responsibility principles. With respect to contractors, the unrealistic complaint constitutes a violation of this Code and of the contractual integrity clause.



- During a verification process, it is mandatory to always speak with the truth and without any particular or subjective intention aimed at causing harm or affecting any person.
- Filing a complaint or participating in a verification process cannot be the basis for retaliation. If you think that someone has breached this rule, you should report it immediately.
- Remember that you can also consult or raise dilemmas.

## Ethical conducts

Include actions and behaviors that materialize the ethical principles of the Business Group. This section describes some of the behaviors expected based on the principles of this Code.

### INTEGRITY

I act with **integrity** when:

- I work with righteousness, loyalty, justice, honesty and transparency.
- I act in a consistent manner, according to what I think, speak and do.
- My decisions and actions are impartial and objective. I do not intend to seek privileges, or undue personal benefits, nor do I take actions based on favoritism, nepotism or clientelism.
- Neither my family, nor I, have private business relationships with Ecopetrol workers, suppliers, contractors, customers, co-workers, or the competition, from which it is possible to obtain

any undue benefit thanks to the role, function or activity that I perform for the company.

- I report conflicts of interest, inabilities and incompatibilities, and situations where I perceive a lack of objectivity, independence or impartiality, as well as associated dilemmas, in accordance with internal procedures. I abstain from acting when a circumstance arises that could constitute a conflict of interest or ethical conflict, or which breaches the regulation of inabilities, incompatibilities and prohibitions.
- I do not accept, request, offer, approve or pay bribes. I do not ask for favors or benefits from Ecopetrol contractors, suppliers, clients and workers.
- I do not make any deals or offer or receive gifts, entertainment or hospitality from stakeholders that may affect the reputation of Ecopetrol or that breach internal regulations.
- I do not use the assets, resources, supplies or material assigned to me for matters other than those inherent in my work or for my own benefit or that of a third party.
- Before managing, executing, authorizing or consenting a payment, I ensure the respective controls and fulfillment of the requirements, without performing actions tending to unduly favor a third party or to obtain an improper benefit.
- I do not present false and malicious reports intended to harm third parties.
- All the information and documentation processed has been verified and I have no knowledge that they correspond to false facts.

- I always speak with the truth, which is above all in every actions and relationships.
- I lead by example.
- My actions respond to the imperatives of common good above private interests.
- I do not tolerate events implying compliance risks (fraud, bribery, corruption, money laundering, terrorist financing, violation of the FCPA), and I promote actions to encourage transparency.

## RESPONSIBILITY

I act with **responsibility** when:

- I deliver the assigned works in a timely manner and with the required quality.
- If something goes wrong, I do not blame others. I identify errors and causes, I take the corrective actions, and I communicate the lessons learned, always promoting continuous improvement.
- I am responsible for my actions and omissions, as well as for knowledge of and compliance with local and international regulations and internal provisions applicable to the matters for which I am accountable.
- I am accountable for the lack of due diligence and care in my actions, as well as for the management of matters or assigned functions, without knowing and applying in-house guidelines, handbooks, procedures, guides and instructions.
- I perform my work efficiently and effectively.
- I protect information, assets and resources that belong to Ecopetrol. I make rational use of the elements assigned to me, guaranteeing their protection and I am accountable for any omission of these duties.
- I honor my promises, duties and commitments.
- I am aware that all recipients of this Code are identified by our engagement with Ecopetrol; therefore, I avoid any work or personal behavior that may impair the good name and reputation of the company.
- I know and comply with the internal and external regulations applicable to my work or activity, the internal work regulations, the culture principles and agreed obligations, and I assure their enforcement.
- I try to meet the required skills to perform the functions or activities assigned.
- I do not breach the duties and prohibitions established in the Constitution, the pertinent contracts, the legal framework and any applicable internal provisions.
- I am accountable for mitigating business and activity risks, abiding by the pertinent controls and executing those that are my responsibility.
- I am responsible for the strengthening and improvement of the Internal Control System.
- I promote information security, thus preventing the leak of strategic confidential, reserved or classified information, according to internal regulations, as well as the dissemination or conveyance of data that could give rise to an improper benefit.
- I do not disclose by any means, whether electronic, printed or audiovisual, improper, illegal, pornographic or racist information.

- I preserve, protect and use the resources assigned to me in a rational, austere and efficient manner.
- I know that the assigned hardware is the property of Ecopetrol, as well as the information contained therein.
- I share my knowledge and experience, I work as a team, and I am collaborative and creative, promoting optimal development of the functions and activities.

## RESPECT

I act with **respect** when:

- I neither discriminate nor harass my workmates because of different sex orientation, race, nationality or family origin, language, gender, religion, political or philosophical opinion, economic, physical or mental condition. I respect and defend differences.
- I promote equality among my colleagues.
- I neither attack nor make fun of people with whom I relate, and I maintain courteous relations. I do not refer to other people using derogatory or offensive words.
- I avoid publishing by any means false or inaccurate information, or performing any action of disrespect or defamation that may affect the image of Ecopetrol, its employees, other people or companies who have a relationship with the company and the group, which may harm their reputation or investors' confidence.
- I accept differences of opinion and encourage the discussion of ideas that promote better practices to perform company activities.
- I treat everyone with respect regardless of their status or position in the company.
- I recognize that as a worker or party related to Ecopetrol, I represent it at all times, and that is why my behavior is appropriate and respectful at work and in my engagement with the society.
- I recognize and do not violate intellectual property and copyrights.
- I reject unfair competition and, therefore, I abstain from making judgments, disqualifying or making negative comments that may affect other companies.
- By no means I perform, disclose or publish offenses or threats against the company or its workers.
- I maintain courteous, cordial relations with my colleagues, clients, suppliers and with all people at large.
- Neither my family, nor I, use my position as employee of Ecopetrol as a mechanism to demand preferences or special treatment, different than that conferred to other citizens, nor do we mistreat the people with whom we interact or from whom we receive the benefits of Ecopetrol.
- I respect the time of others, and arrive on time to appointments, interviews and work meetings.
- I acknowledge and accept the habits, traditions and customs of the communities with which I interact.
- I promote a cordial and positive environment, expressing my disagreement with responsibility and respect. I care about the improvement of interpersonal communication and working climate.

## COMMITMENT TO LIFE

I act **committed to life** when:

- I respect and promote respect for human rights.
- I perform my tasks with self-care.
- I comply with and enforce HSE rules.
- I give priority to my health and safety and that of my collaborators.
- I protect the environment. I try that my actions preserve and improve the environment and the social milieu surrounding me.
- I report incidents related to compliance with internal HSE rules.
- I avoid violent actions in all areas, both in my work and personal life, to protect people's life, health and integrity.
- The activities I perform for the benefit of the community are aligned with the guidelines for environmental management and the business strategy.
- I place garbage and recyclable material in the designated containers.
- I respect and enforce internal security rules and the conditions or guidelines established in terms of access to, permanence, and exit from the company facilities.

## Dear collaborators and related parties:

Our company has strategic objectives, processes that support them, risks implied in the tasks and controls to mitigate them, and all these are part of the Internal Control System. At Ecopetrol, we all have the obligation to fulfill our duties, with the aim of achieving objectives and preventing risk materialization. Failure to do so generates faults against the accountability principles set forth in this Code and failures in our Internal Control System.

The internal controls are designed to protect our management, and that is why we are all part of this system.

***Compliance Corporate Vice Presidency - Ecopetrol S.A.***

## **Behaviors that are contrary to ethics, with immediate and global repercussion on the contractors of Ecopetrol and its Business Group**

The legal representative, attorney, authorized officer or whoever acts on behalf of Ecopetrol S.A. and any of the subordinates or subsidiaries of the Group for contracting purposes, shall exercise the power to terminate the contracts or agreements entered into with the contractor for Ecopetrol and the Group companies, regardless of the singular or plural nature of the contractor (not considering the form of association), once the established and agreed contractual procedures have been exhausted, and after obtaining the opinion of the Ethics and Compliance Officer of Ecopetrol S.A., confirming one or more of the conducts described below:

- Any of the situations described in the declaration contained in the supplier registry (Declaration of Prevention of AML/CTF).
- Any action or omission that corresponds to acts of fraud, bribery and corruption, violations of the FCPA, gifts, entertainment and hospitality, conflicts of interest or ethics, in accordance with the provisions of this Code and applicable regulations.

### **PROCEDURE**

Once the complaint is received in the ethics hotline, the competent department will assess the merit of the information. For this purpose, you may request information or any type of evidence that allows to confirm the existence of the conduct.

Within the term that is estimated based on the complexity of the ethical case, the competent area will call the contractors involved to give explanations, request or provide evidence to support their defense, and contradict existing facts or evidence.

Once the explanations of the contractor involved have been assessed, the elements of judgment submitted, as well as those collected by the competent area in accordance with their conduct, relevance and validity, the merit of the action will be evaluated.

After concluding the previous process, should there be merit to show the existence of behaviors that are contrary to ethics, which have immediate and global repercussion and that give rise to the termination of contracts, the Ethics and Compliance Officer of Ecopetrol S.A. will review or render an unfavorable confirming opinion, as the case may be, which will be sent to the legal representative, attorney-in-fact, authorized official, or whoever acts on behalf of Ecopetrol S.A. and any of the subordinates or subsidiaries of the Group for contracting purposes, for the exhaustion of the processes required for the termination of the respective contracts or agreements.

In case that the judgment elements do not lead to the reasonable conviction that any of the unethical behaviors have been committed to merit the termination of the contracts entered into with Ecopetrol and its group, the claim shall be closed. If at any time new elements relative to any of the behaviors described above and taking into account the explanations of the contractor, if appropriate, the Ethics and Compliance Officer will state his respective opinion.

Other conducts that infringe this Code will be managed according to the procedures set out and to other legal and contractual provisions that may be applicable. The foregoing, without prejudice to the powers that Ecopetrol has to invite and select the different suppliers and contractors, as well as to evaluate their performance.

## **Frequently asked questions Code of Ethics and Conduct:**

### **Who are beneficiaries at Ecopetrol?**

Beneficiaries are those who receive services from the company, because of or in relation with a link with Ecopetrol or that of their relatives, such as pensioners, users of the health service, education or any other service, assistance or retribution that implies the use of goods or resources of Ecopetrol.

### **Does the Code of Ethics and Conduct apply to the workers and contractors of the Ecopetrol Business Group?**

**Yes.** Keep in mind that the Code of Ethics and Conduct is applicable to Ecopetrol, to the companies of the Business Group, and to persons who, regardless of their corporate or individual nature, have any relationship with Ecopetrol. This includes workers, beneficiaries, members of the Board of Directors, shareholders, contractors, suppliers, agents, partners, allies and clients, as well as to personnel and companies that the contractors engage in the execution of the contracted activities, as applicable.

### **Does the Code of Ethics and Conduct apply to the beneficiaries of Ecopetrol workers?**

**Yes.** It applies as related to those who are registered as beneficiaries, that is, those who receive services because of or in relation with their link with Ecopetrol, such as pensioners, users of health and education services, or any other form that implies the use of assets or resources of the company.

### **Where should I report potential situations that may constitute a violation of the Code of Ethics and Conduct?**

Register your complaint in the ethics hotline of Ecopetrol, entering **<http://lineaetica.ecopetrol.com.co>**.

### **What is a complaint?**

It is the mechanism or action of any person to report, by means of the ethics hotline, the facts or inappropriate conducts that may constitute a violation of the Code of Ethics and Conduct that require verification. Complaints may be of ethical or compliance nature, as set out in internal regulations.

## **What is a dilemma?**

These are doubts that may arise from the actions of the recipients of the Code of Ethics and Conduct regarding the principles of the Code and its guidelines relative to conflicts of interest or ethics, gifts, entertainment and hospitality, corruption, bribery, fraud, money laundering, terrorist financing, FCPA, human rights, social responsibility, use of goods and information management, among others, which aim to receive guidance so as not to commit undue acts not complying with the ethics of the organization.

## **What is a query?**

These are requirements related to due diligence procedures, associated with the prevention of acts of fraud, corruption, bribery, money laundering, terrorist financing and violation of the FCPA. Through these consultation, possible warning signs are reviewed regarding contractors, suppliers, partners or workers, among others, and recommendations are issued to mitigate the warning signals detected.

## **Ecopetrol is a Colombian company. Why do we have to comply with US laws?**

Ecopetrol is registered in the United States securities market and it also has offices and businesses in that country. Because of such links, it is subject to the application of certain US laws, including the Foreign Corrupt Practices Act - FCPA. This standard contains a number of prohibitions on corruption, bribery and internal controls that must be accepted by the company.

## **I am a Colombian citizen. Why does the FCPA apply to me?**

The FCPA applies to you as a worker of Ecopetrol or your Group, because we are an organization that has business activities in that country, and is registered in the stock exchange, as mentioned above. That is why you can be sanctioned in the United States if you offer, promise, give or authorize payments or anything of value to public officials or politically exposed persons, directly or indirectly through third parties, with the intention of maintaining or obtaining improper advantages. Likewise, for violating the prohibitions related to demanding to accept anything of value to generate an undue benefit.

## **Does the FCPA prohibit providing gifts, entertainment and hospitality to friends who are public officials?**

The FCPA prohibits giving "anything of value" to a public official. This includes gifts, entertainment and hospitality. Although your relationship with the official is personal, the fact that you invite him to dinner or give him a gift, entertainment or hospitality could become a risk for Ecopetrol. Therefore, before extending an attention or giving a gift, you should consult the internal regulations or the respective compliance area, through the ethics hotline of Ecopetrol.

## **What does the FCPA require in relation with third parties?**

The FCPA requires: (1) conducting due diligence before hiring a third party; (2) requiring all third parties to certify that they understand FCPA obligations and agree to comply with them; (3) any contract with a third party includes the obligation to comply with the FCPA, according to internal regulations; and (4) monitoring of compliance of the third party with the obligations of the FCPA.



**What do I do if one of my workers reports a conflict of interest or ethics conflict?**

It is the obligation of every supervisor to send a copy of the conflict to the Ethics and Compliance Officer of Ecopetrol S.A. or to the Compliance Officer of the respective company with the response or procedure applied to that statement. Likewise, it is your obligation to adopt measures so that the conflict does not materialize in the exercise of the activities assigned to the worker.

**I am aware of a situation that may breach the Code of Ethics and Conduct, but I am afraid to report the situation to the ethics hotline, because my immediate boss may retaliate against me. What should I do?**

You must report the aforementioned facts to the ethics hotline. There is no reason for fear; reporting is an obligation that does not generate retaliation against the complainant.

In any event, it is pertinent to bear in mind that you cannot make complaints with the knowledge that it is false information, as you can violate the principles of integrity and responsibility set out in this Code.

**The manager of the contractor company with respect to which I perform supervision activities has invited me to give a talk in a hotel in Cancun (Mexico), to go with my wife and children. The academic sessions take place in the morning and in the afternoon they invite us to the scheduled recreational activities or leave the afternoon free. Can I accept the invitation?**

Report the case to your immediate supervisor and present a dilemma in the ethics hotline. According to what is set forth in the internal procedures, you should

not accept extra work invitations to workers and their relatives from people who have a commercial interest with the company. Therefore, you must refrain from accepting the invitation and wait for the corresponding ethical concept to be issued.

**Currently I work in the XX Vice Presidency and as part of my functions I must receive report and different deliverables from the ZZ firm, where a brother-in-law works as a member of the team that presents the contract products. What should I do?**

You must withdraw from the functions you are performing that are related to the functions of your brother-in-law or with the activities carried out by the contractor who employs it, because this circumstance generates a conflict of interest. You must report the situation to your superior and to the Ethics and Compliance Officer of Ecopetrol S.A. or to the respective Compliance Officer.

**I worked for four years in the firm XYZ. Six months ago I joined Ecopetrol and today I was appointed to be part of the planning team in a selection process related to the branch of that company and it is likely that I be designated to evaluate the offers. The firm in question could be interested in submitting an offer, according to the information that my ex-colleagues with whom I have a friendship relationship have given me. What should I do?**

Whenever an ethical conflict can materialize, you must immediately report it to your superior in order to be assigned to other processes or projects in which who are not going to have a relationship with your previous employer or with your friends.



This situation must be reported to the Ethics and Compliance Officer of Ecopetrol S.A. or to the respective Compliance Officer.

**As part of my functions, I must review and approve the reports delivered by the contractor YY. As a result of that interaction with that company, I became friends with two of their employees, whose work I must supervise. They now have a sentimental relationship, have decided to get**

**married and have asked me to be their wedding best man. What should I do?**

Bearing in mind that you must verify and approve the reports submitted by the employer who are now your friends and being their wedding best man, there is an ethical conflict; therefore, you must report the situation to your supervisor, withdraw immediately from the work related to the contractor YY, and report it to the Ethics and Compliance Officer of Ecopetrol S.A. or the respective Compliance Officer.

**Do you know that Ecopetrol S.A and its Business Group have a series of procedures, instructions, guides, handbooks, risks and controls that we must apply? How well do you know them?**

**Knowing the rules of the company is a must. Not knowing them and failing to apply them results in breaching the Code of Ethics and Conduct. Consult the ethics hotline.**

**<http://lineaetica.ecopetrol.com.co>**

<http://lineaetica.ecopetrol.com.co>



International line

**01 800 912 1013**



Bogotá

**234 39 00 ext. 43900**



<http://lineaetica.ecopetrol.com.co>  
[www.ecopetrol.com.co](http://www.ecopetrol.com.co)

# Do not let that happen to you!

**The main sanctions for violations of the FCPA have been imposed because of events such as:**

- Bribe to customs agents, aimed at securing the renewal of contracts.
- Signature of a fictitious consulting contract with a third party, characterizing the payments in the books and records as legitimate consultancy expenses, to support a bribe.
- Payments to government officials to be granted environmental licenses, regulatory approvals and authorizations.

**Ask yourself the following questions in order to avoid accepting gifts, entertainment or hospitality that ignore the business guidelines:**

- Is the intention to show kindness or is it intended to influence a decision?
- Would accepting it be an obligation to the third party?
- Would you be embarrassed or fearful if your colleagues find out that you received it?
- If you see that your partner is offered this kind of gift, entertainment or hospitality, how would you see it?
- Would you offer this kind of gift, entertainment or hospitality without expecting anything in return?

# Do not let that happen to you!

**I am the administrator of a contract and I authorized the payment of some goods that were delivered by the contractor, supported by the certificate of compliance with the technical specifications issued by it, without having personally verified them. Doing this could mean that I am breaching the Code of Ethics and Conduct?**

**Yes.** It is your obligation to protect the resources of the Company; therefore, such actions breach the principle of responsibility. Remember that before making any payment, you must confirm that the contractor has complied with all that agreed.

**I registered in a notary, as my son, a cousin's child so that he could access the benefits of Ecopetrol. Since I do not have my own descendants, I did not consider it inconvenient because I love this child as if it were my own and he needs the resources to be able to study because his father is undergoing a difficult economic situation. Did I breach the Code of Ethics and Conduct?**

**Yes.** Failing to state the truth and reporting inconsistent information to receive a benefit for you or for a third party, which also involves the improper use of resources, violates the principles of integrity and responsibility of the Code. Additionally, keep in mind that altering civil registries may constitute an offense sanctioned by criminal law.

**My daughter needs computer paper to print a school paper, can I take some paper from the office?**

**No.** The paper supplied by Ecopetrol is intended for your company work and not for personal use of personnel at their home. Such action breaches the integrity and responsibility principles.

# Do not let that happen to you!

**My cousin works with a contractor and I am the administrator of that contract; however, he and I are not close. Am I obliged to withdraw from this role because of a conflict of interest?**

**Yes.** You cannot be the administrator of that contract. Cousins correspond to the fourth degree of consanguinity and regardless of their degree of affection or closeness, there is a legal impediment to act. You must report the matter to your supervisor and to the respective compliance area.

**My stepfather works in a Vice Presidency other than mine. My boss has appointed me to do a job with that area and my mother's husband will be the team leader. Is there a problem if we work together?**

**Yes.** Your stepfather has no kinship relationship, but given your relationship with him, whether good or bad, this can affect your independence and objectivity, in which case it would be an ethical conflict. Being part of this activity without reporting the conflict branches the integrity principle, so you must report the fact to your immediate boss so that one of the two is withdrawn from the process. Likewise, you must report it to the compliance area of the company.

**I support the supervision of a material transport contract and I must validate the quantities and services for billing. My son-in-law is a partner of the contractor and one of the vehicles with which he provides the service is owned by my uncle. Is this a conflict of interest or ethical issue, even if I am not the contract administrator?**

**Yes.** You are in conflict because you make decisions relative to the contract in which your relatives are involved.

# Do not let that happen to you!

**I worked for a firm in the Oil & Gas sector and I have been selected to work for Ecopetrol. In this new role, I have been appointed to the evaluation committee of a contractor selection process, in which the company for which I worked before is participating. The people who would sign and structure the offer are my previous bosses and colleagues, who, before my appointment as an evaluator, had mentioned to me their interest in talking about the process, the evaluation mechanism, and how they could improve their offer to be awarded the contract. Should I report this situation?**

**Yes.** You must report a dilemma in the ethics hotline and report, in writing, to your immediate supervisor that you face an ethical conflict because in the assigned process your former bosses and colleagues will participate. Also, it is necessary reporting the fact as the contractor is trying to have an improper advantage.

**I am the supervisor of a contract, not the administrator. My job is to validate the work schedules of the contractor's staff. I have a sister who is unemployed. Can I ask the contractor to hire my sister for execution of a contract other than the one they have with Ecopetrol?**

**No.** In accordance with the Code of Ethics and Conduct, neither the workers nor their families should use their position in Ecopetrol to obtain benefits.

**We are close to the end of the year and the contract that I manage is somewhat delayed, but I know that it can be updated in early January. Is it possible to certify the receipt to satisfaction of an activity and authorize its payment with the commitment that it will be completed in January as this will enable us to execute the resources allocated to this period?**

**No.** Keep in mind that the integrity principle imposes the obligation of assuring internal controls, guaranteeing contractors' fulfillment of their commitments, and ensure that contractors meet their commitments and verify that all information processed for a payment is true.