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

1. PURPOSE

To establish the principal elements of the Human Rights (HRs) management for the Ecopetrol Group (EG), according to national and international standards and requirements for 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, to leverage the achievement of the company objectives from 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 over 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 its HRs management, the company grants special consideration for these rights and liberties:

- ∩ Right to life
- ∩ Right to personal integrity
- ∩ Right to personal freedom
- ∩ Freedom of association and the right to collective bargaining
- ∩ Right to dignified, favorable, and appropriate working conditions
- ∩ Children's rights
- ∩ 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 HUMAN RIGHTS MANAGEMENT

The guiding principles of Ecopetrol's HRs management are:

- **Due diligence on human rights:** 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 cardinal elements for the HRs management improvement, **which has criteria** (objectives, plans, and indicators) jointly defined

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- by different departments of the company in charge of HRs relevant affairs.
- **Transversality:** Respect for HRs is a commitment of the entire company, which must be materialized regarding its stakeholders and be manifested in the performance of its departments, according to their 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 repair them if affected.
 - **Collaborative working:** Ecopetrol aims to articulate its HRs management policy with HRs policies of public and private entities, and of other relevant actors on these affairs.

C. IMPLEMENTATION

a. Strategy and addressing

The Secretary General (SEG), through the Corporate Responsibility Department (CRD) and implementing 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, the documents and policies related to HRs of Ecopetrol. Under this exercise, the internal documents of Ecopetrol that develop related subjects must be consistent 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 perception and analysis of stakeholder expectations


The CRD periodically applies the HR module in the consultation on stakeholders' perceptions and expectations, in order to identify the expectations in this area and to manage them, in a manner 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 Human Rights Plan). The HRP will be part of the management instruments of the CRS.

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

In preparing the HRP, the results of the surveys on stakeholder perceptions and expectations (HRs module), risks analyses, performance evaluations of contractors, consolidated reports on petitions,

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complaints, and claims, legal actions, and **complaints** related to HRs issues will be taken into account. Furthermore, normative changes, public policies, and good practices development, among others, will be considered for this purpose.

(iii) Monitoring

The CRD periodically monitors the development of those risks identified in the HRs risks analyses, as well as the petitions, complaints, and claims related to HRs issues known by Ecopetrol.

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 a **process** indicator to supervise and evaluate the compliance with the HRP. The CRD supervises the process indicator on a quarterly basis.

(v) Operational Remediation Mechanisms

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

Ecopetrol recognizes that accessing to its mechanism is neither a condition nor an obstacle to those who consider themselves affected, to resort to mechanisms established by the national authorities to attend their requests, complaints, and claims.

In the events Ecopetrol identifies that has caused or contributed to adverse impacts on the HRs of any person, 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 the Integrated Sustainable Management Report of Ecopetrol. That department will promote the use of the *Global Reporting Initiative* (GRI) standards for reporting HRs issues by the EG.

D. SCOPE

These guidelines apply to relations with and between our employees.

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

