

REPORTING ON BREACHES TO THE CODE OF CONDUCT 2023¹

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	15	4	10	0 ⁵
Discrimination or Harassment ⁶	7	2	3	1
Customer Privacy Data	0 ⁷	0	0	0
Conflict of Interests	95	40	41	11
Money Laundering or Insider Trading Dealing	0 ⁷	0	0	0
Loss of Confidential Information	59	11	28	22 ⁸
Theft	9	4	5	0
Antitrust / Anticompetitive Practices	4	1	3	0
Environment, Health, and Safety	7	3	4	0
Disrespect, Mistreatment or Hostile Environment	91	47	38	6
Breach of Rules and Procedures ⁹	192	68	94	34
Other Case Typologies ¹⁰	18	3	11	3
TOTAL	497	183	237	77

¹ No investigations were communicated or conducted by external authorities in 2023.

² The numbers that are shown in this column reflects the initial assigned category according to the information given in the report. Reports received in 2023 and those that were under investigation on January 1, 2023, are included.

³ Some reports were reclassified in another category during investigation according to the information collected: (i) 3 of the 11 breaches of "Conflict of Interests" were initially classified as "Corruption or Bribery", "Loss of Confidential Information" and "Breach of Rules and Procedures"; (ii) 4 of the 22 breaches of "Loss of Confidential Information" were classified in the following areas: 3 as "Conflict of Interests" and 1 as "Breach of Rules and Procedures"; (iii) 6 of the 34 breaches of "Breach of Rules and Procedures" were initially classified in the following areas: 2 as "Conflict of Interests", 1 as "Loss of Confidential Information", 1 as "Discrimination or Harassment" and 2 as "Other Case Typologies"; (iv) 1 of the 3 breaches of "Other Case Typologies" was initially classified as "Conflict of Interests".

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 2023 there were no breaches regarding bribery and corruption

⁶ Reports corresponded to sexual harassment, not to discrimination.

⁷ During 2023, 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 and concern shareholders different from customers.

⁹ This category includes any failure to comply with Ecopetrol's internal regulation and procedures.

¹⁰ "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 ECP	Notification to the Attorney General's Office	Notification to the Disciplinary Control Management	Notification to the Legal Vice presidency	Reports to the UIAF ²	Notification to the Assurance of Risks and Internal Control Management	Preventive Ethical Conversations	Notification to the Vicepresidency of supply	Notification to other areas of the company or subsidiaries for preventive actions	Notification to the contract administrator
Corruption or Bribery	0	-	-	-	-	-	-	-	-	-	-
Discrimination or Harassment	1	-	1	-	-	-	-	-	-	2	-
Customer Privacy Data	0	-	-	-	-	-	-	-	-	-	-
Conflict of Interests	11	6	3	6	-	1	-	3	4	4	2
Money Laundering or Insider trading Dealing	0	-	-	-	-	-	-	-	-	-	-
Loss of Confidential information	22	2	2	2	-	-	28	15	3	14	2
Theft	0	-	-	-	-	-	-	-	-	-	-
Antitrust / Anticompetitive Practices	0	-	-	-	-	-	-	-	-	-	-
Environment, Health and Safety	0	-	-	-	-	-	-	-	-	-	-
Disrespect, Mistreatment or Hostile Environment	6	2	-	2	-	-	1	2	-	2	-
Breach of Rules and Procedures	34	8	1	13	2	-	9	19	8	10	4
Other Case Typologies	3	1	-	3	3	-	-	-	-	1	-
TOTAL	77	19	7	26	5	1	38	39	15	33	8

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.