
	<b>Guide on Human Rights and Business</b>		
	<b>Corporate Responsibility System Vice-Presidency of Corporate Affairs and General Secretariat</b>		
	<b>CODIGO GEE-G-035I</b>	<b>Elaborado 14/03/2024</b>	<b>Versión: 3</b>

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## 1. PURPOSE

Establish the elements that guide Ecopetrol Group Human Rights (HHRR) management<sup>1</sup>, in accordance with the standards established in the universal, Inter-American, and national HHRR systems, related to its business activities.

## 2. GENERALITIES

### 2.1. SCOPE

This Guide is addressed both to the members of the boards of directors and the employees of Ecopetrol S.A. and the companies covered by this Guide, as well as its suppliers, who are required to consider this commitment for the development of their activities. Consequently, this Guide will be of mandatory knowledge and implementation for those to whom it is addressed, who must ensure that their actions are always governed by its guidelines.

Ecopetrol also encourages its partners, allies, customers, agents, and other actors with whom it has a contractual or commercial relationship, to adopt them, especially during activities that are carried out jointly.

### 2.2. DEFINITIONS

In order to facilitate the understanding of this Guide, the following terms will be taken into account: (<https://ecopetrol.sharepoint.com/teams/gentepila/glosariocorpo/SitePages/Glosario.aspx>):

**Human Rights:** Rights inherent to all human beings, for the simple fact of existing, regardless of nationality, gender, ethnic or national origin, color, religion, language or any other status. These rights are all interrelated, interdependent and indivisible<sup>2</sup>.

**Due Diligence on Human Rights:** Ecopetrol understands that due diligence involves the set of interrelated processes to identify risks and negative impacts on HHRR, prevent and mitigate them, follow-up on the implementation of action plans and their results, and report internally and externally on how these impacts are addressed in relation to its own activities, its supply chain and other business relationships.


### 2.3. HUMAN RIGHTS GUIDELINES AND SUPPORT GUIDES

In addition to this HHRR Guide, Ecopetrol has other internal instruments to guide its management and reaffirm its commitment to respect HHRR.

- Ecopetrol's Integral Policy (SGC-POL-001)
- Code of Ethics and Conduct (SCI-B-001)
- Guide to the HHRR Risk Management Cycle (GEE-G-042)
- Declaration of Commitment to Human Rights Defenders
- Guide for labor matters in activities contracted by Ecopetrol (GAB-G-013)
- Diversity and Inclusion Guide (GTH-G-150)

<sup>1</sup> This Guide applies to the companies included in the scope of the Relationship Model (GEE-G-041 document) particularly those in which Ecopetrol has a 100% shareholding, as well as in those controlled companies in which Ecopetrol doesn't have a 100% shareholding. The other companies of the Ecopetrol Group may follow or implement these guidelines as defined by their corporate bodies.

<sup>2</sup> United Nations Human Rights Office of the High Commissioner. *What are human rights?* <https://www.ohchr.org/es/what-are-human-rights>  
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- Strategy for Integrated Land Management (GEE-N-001)
- Procedure for population resettlement in the development of operations and projects (GDE-P-023)
- Guide for relations with ethnic communities (GDE-G-006)
- Procedures for Previous Consultations (GDE-P-008)
- Due diligence instructions for the attention of complaints and threats or affectations to personal integrity (SRC-I-001).

### 3. GUIDELINE DEVELOPMENT

#### 3.1 INTRODUCTION

The Ecopetrol Group 2040 strategy: Energy that Transforms, consists of four strategic pillars: (i) Growing with the Energy Transition, (ii) Generating Value through TESHG, (iii) Cutting-edge Knowledge and (iv) Competitive Returns.

This strategy seeks to position the Ecopetrol Group as a diversified energy group that boosts growth through energy efficiency and the acceleration of decarbonization. The company plans to gradually increase investment in renewable and low-emission energies, which will increase the competitiveness and profitability of the business and significantly reduce its impact on the environment and people.

Adequate management and due diligence around human rights (hereinafter HHRR) are fundamental in the established strategic pillars, since they allow us to monitor the effectiveness of the actions conducted by the Group's companies to respect HHRR and to establish points for improvement to meet the challenges of the industry and the just energy transition, with opportunities, equity and justice for all people.

Ecopetrol is committed to implement a Just Energy Transition based on respect for HHRR and Diversity, Equity and Inclusion (hereinafter DEI) in the development of its activities and understands that the challenges of climate change and decarbonization require inclusive dialogue processes and an understanding of the implications on people's rights.

The HHRR approach is cross-cutting to the management of the material issues<sup>3</sup> that are part of the Generate Value through TESHG® pillar of the 2040 strategy, and the commitment to respect for HHRR extends to all Ecopetrol's stakeholders. Hence, this guide reflects our commitment to respect HHRR.


#### 3.2 OUR COMMITMENT

The Ecopetrol Group is committed to respect HHRR and reaffirms its commitment to the International Bill of Human Rights<sup>4</sup> and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

The Group adheres to the United Nations Guiding Principles on Business and Human Rights (UNGPs), the Ten Principles of the Global Compact and the OECD Guidelines for Multinational Enterprises. Additionally it is committed to following the Voluntary Principles on Security and Human Rights, ILO Convention 169, and the Performance Standards established by the International Finance Corporation (IFC), especially

<sup>3</sup> Ecopetrol S.A. updated its ESG materiality in 2023, prioritizing 14 material elements, among which are: climate change, water, biodiversity, air quality, materials and waste, responsible supply chain, financial sustainability, occupational health, industrial and process safety, human talent, sustainable territories, cybersecurity and information security, innovation, science and technology, and ethics and transparency. This update recognizes that Human Rights is a cross-cutting issue for the 14 issues mentioned above.

<sup>4</sup> The International Bill of Human Rights is composed of the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights and its two Optional Protocols.

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those related to Labor and Working Conditions, Resource Efficiency and Pollution Prevention, Land Acquisition and Involuntary Resettlement, Biodiversity Conservation and Sustainable Management of Living Natural Resources, and Indigenous Peoples.

Furthermore, the Group expresses its commitment to the Convention on Biological Diversity and the United Nations General Assembly Resolution 76/300 on the human right to a healthy environment. All of this as part of a diligent climate action that contributes to the mitigation of the negative impacts of greenhouse gases on ecosystems and people.

The Ecopetrol Group's commitment to respect HHRR extends to all internationally recognized rights. Nevertheless, in the context of its operation and its contractual and commercial relationships, the Company will act in a proactive and differentiated manner to respect the following rights and freedoms<sup>5</sup>:

- Right to life.
- Right to personal integrity.
- Right to personal freedom.
- Children's rights, especially the prohibition of child labor.
- Right to equality and non-discrimination.
- Right to free speech.
- Right to information.
- Right to privacy and personal data protection.
- Right to the participation of ethnic groups through prior consultation.
- Collective and environmental rights.
- The right to work in decent, favorable, and adequate conditions and without discrimination.
- Prohibition of forced or compulsory labor and trafficking in persons.
- Freedom of association and collective bargaining.
- Right to occupational health and safety.


On the other hand, Ecopetrol promotes inclusive work and social environments that recognize the value of people regardless of sex, physical capacity, ethnic identity, physiognomy, genetic characteristics, age, religious beliefs, political or philosophical ideology, educational level, nationality, family origin, language, sexual orientation, gender identity, socioeconomic level, or any other socio-cultural characteristic<sup>6</sup>, as well as thought, expression, and ways of being.

In this regard, Ecopetrol Group, in developing its commitment to diversity, equity and inclusion<sup>7</sup>, the rejection of discrimination and the principle of equity for the equal enjoyment of rights, adheres to the United Nations Women's Empowerment Principles, the Global Compact's Principles of Business Conduct for the Protection of LGBTI people, and is committed to the Guide for companies on the rights of people with disabilities and the ILO's Guide to ethnic diversity at work. Moreover, Ecopetrol Group rejects any action that is associated with modern slavery<sup>8</sup> and trafficking in persons in its operations and business relationships. Ecopetrol reaffirms its commitment to the consolidation and promotion of decent work throughout its value chain, to prevent risks that affect the effective exercise of workers' rights.

<sup>5</sup> These rights and freedoms will be especially analyzed in the risk surveys carried out by the Company in its own operations and in those carried out with partners, as well as in its supply chain.

<sup>7</sup> GTH-G-150 Guide to Diversity, Equity and Inclusion

<sup>8</sup> It is a term that encompasses situations associated with slavery, servitude, forced labor and child labor. This practice is prohibited by national and international normative frameworks and is considered a serious violation of human rights insofar as it affects the freedom and dignity of individuals.

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In order to contribute to the fulfillment of the Sustainable Development Goals (SDGs), the Ecopetrol Group is committed to the Paris Agreement and understands the importance of incorporating respect for HHRR in the energy transition process to mitigate climate change. Therefore, Ecopetrol develops scenarios for dialogue and participation with the stakeholders to prevent possible impacts and identify and implement opportunities and solutions to environmental and social challenges, seeking to generate value in the territories and their different stakeholders in a sustainable manner.

In addition, Ecopetrol acknowledges the importance of regional agreements that promote the respect and promotion of HHRR, such as the Escazú Agreement and its emphasis on access to information and respect for HHRR advocates.

### **Principles for HHRR Management in Ecopetrol**

Eight principles guide the Company's HHRR management:

- 1. HHRR Due Diligence:** Ecopetrol understands that due diligence involves a set of interrelated processes to identify risks and negative impacts on HHRR, prevent and mitigate them, follow up on the implementation of action plans and their results, and report internally and externally on how these impacts are addressed in relation to its own activities, its supply chain and other business relationships.
- 2. Reparation:** In cases where Ecopetrol identifies that it has caused or contributed to adverse impacts on HHRR, the corresponding compensation or remediation will be provided, through the operational grievance mechanisms provided or within the framework of any other legitimate process.
- 3. Cross-cutting nature:** Respect for HHRR is a commitment of the Ecopetrol Group, which guides its relationship with the different stakeholders and is reflected in the management of all areas and each of the companies, within the framework of their functions, in accordance with the highest national and international standards.
- 4. Complementarity:** Ecopetrol acknowledges that the roles and responsibilities of the State regarding HHRR are different from those of companies. Ecopetrol recognizes the obligation of States to respect, ensure and protect HHRR, as well as the responsibilities of companies to respect them and provide remediation when necessary.
- 5. Collaborative work:** Ecopetrol seeks to coordinate HHRR in its business activity and practice with the efforts of other organizations. These include public agencies in the implementation of their policies, private agencies with experience advancing HHRR, international organizations, and other stakeholders that may be relevant at advancing HHRR in business activity.
- 6. Differential approach:** Ecopetrol respects the rights of people belonging to groups or populations that may be particularly vulnerable to adverse impacts on their HHRR. During its business activities, Ecopetrol shall apply the differential approach to prevent, mitigate, or remedy such impacts. The differential approach components are gender, ethnicity, origin and socio-cultural characteristics, disability, sexual orientation, and all those considered in Ecopetrol's Diversity, Equity, and Inclusion Guide (GTH-G-150). Ecopetrol's commitment to safeguard the rights of children and adolescents as subjects of differential attention is highlighted.
- 7. Territorial Approach:** When developing business activities, the Company takes into consideration the particularities of each territory where it operates, in order to prevent risks and impacts on HHRR, according to the context.
- 8. Continuous improvement:** Monitoring and self-evaluation are fundamental elements for the improvement of HHRR management. This management is based on a series of elements (objectives, plans and indicators) defined jointly with the different areas in charge of HHRR affairs.

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### 3.3 DUE DILIGENCE

Ecopetrol has a PDCA<sup>9</sup> cycle (See Annex A) to manage HHRR matters. Under this action framework, Ecopetrol identifies and manages risks and negative impacts arising from business activity, the supply chain or other contractual or commercial relationships, and establishes action plans for their prevention, mitigation, or remediation. This occurs at the strategic, tactical, and operational levels, in accordance with the Integrated Risk Management System<sup>10</sup>.

This exercise identifies the risks and impacts associated with HHRR, establishing whether they occur as a direct consequence of the Company's actions, whether there has been a contribution to the possible effects or whether they are a consequence of its commercial relations. Moreover, it incorporates those risks and impacts on HHRR derived from the dynamics of the environment, with special consideration of the implications on the rights of workers and communities. During this cycle, the Company prioritizes the inclusion of the perceptions and expectations of its stakeholders, particularly those in vulnerable situations and who are considered subjects of special constitutional protection<sup>11</sup>, in order to understand the effects of the Company's actions on the territory and its people.

Given that, some of the areas where Ecopetrol and its Group operate are affected by conflict dynamics, which generates an increase in potential risks and impacts associated with HHRR, the Company reinforces its due diligence actions<sup>12</sup> and promotes it throughout its value chain.

#### Annual HHRR Plan

The annual HHRR plan is the tool that ensures the proper application of the HHRR Guidelines. The preparation, monitoring, and evaluation of this plan<sup>13</sup> for Ecopetrol is led by the Vice-Presidency of Corporate Affairs and General Secretariat, through the Corporate Responsibility Management<sup>14</sup>.

The results of the analysis of perceptions and expectations of the stakeholders, national and international ESG trends, the results of self-diagnoses, reports on operational HHRR risks, HHRR standards and the results of external measurements, and reports of requests, complaints and claims related to HHRR are considered in its preparation. Regulatory changes, public policies, and best practices, among other sources, are also considered.

The Annual HHRR Plan incorporates the actions defined with the areas in charge of managing these issues, which are responsible for implementation and reporting on progress on a quarterly basis. The plans also include cross-cutting training, communication, and monitoring actions. The Vice-Presidency of Corporate Affairs and General Secretariat, through the Corporate Responsibility Management, is in charge of approving and monitoring the plan.

<sup>9</sup> Plan, Do, Check and Adjust.

<sup>10</sup> The Corporate Responsibility Management approved the HR Risk Management Cycle Guide (GEE-G-042), through which it will provide guidelines for the identification and management of HR risks in Ecopetrol, in accordance with the provisions of the Guide for Integrated Risk Management in the Ecopetrol Group and international standards on HR. The areas and/or processes defined therein are responsible for the identification of HR risks at the operational level.


<sup>11</sup> The individuals subject to special constitutional protection are those who, due to their physical, psychological or social condition, deserve positive action to achieve real and effective equality. In this regard, special measures are required for particular conditions in the process of risk management and human rights impacts. This category includes children, adolescents, the elderly, people with disabilities, single mothers, people displaced by violence, indigenous peoples and those living in extreme poverty.

<sup>12</sup> Particularly in relation to identifying, preventing and mitigating risks to human rights, both those arising from its activities and those associated with its business relationships.

<sup>13</sup> Each company will define its annual or biannual action plan, in accordance with its HR management cycle.

<sup>14</sup> In other companies, the drafting of the plan, as well as other due diligence actions, will be led by the area with functions equivalent to those of the Corporate Responsibility Management.



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### 3.4 IMPLEMENTATION AND COMMUNICATION

The implementation of this Guide is part of the Corporate Responsibility System (CRS) that guides Ecopetrol's behavior as a corporate citizen and leverages the pillar of Generating Value through TESHG®, with the purpose of contributing to the achievement of business objectives.

Furthermore, Ecopetrol, through the Ecopetrol Group's Relationship Model<sup>15</sup> and acting through the Vice-Presidency of Corporate Affairs and General Secretariat, provides guidelines for the implementation of the HHRR matters described in this Guide and in other documents directly related to the subject. The implementation and operability of these guidelines is overseen by the areas responsible for the themes in each company.

Human rights matters are addressed at the highest level in Ecopetrol. Thus, this topic is part of the continuous training of its Board of Directors, to remain at the forefront and informed of relevant HHRR issues, which contribute to the strategic decision-making of the Company and its Group.

On the other hand, Ecopetrol raises awareness and provides training in HHRR to the members of Ecopetrol's Steering Committee and the members of the bodies that act as such in the other companies, as well as to all its employees.

The company also promotes these matters among its suppliers, partners, customers, and other stakeholders, to ensure respectful management of HHRR throughout its operations, supply chain and other business relationships.

This policy must be socialized periodically with Ecopetrol Group employees and with the other stakeholders, in the spaces established for this purpose.

### 3.5 HUMAN RIGHTS MANAGEMENT INDICATORS


Ecopetrol, by means of its Performance Model, establishes annually its Balanced Management Board (TBG, *Tablero Balanceado de Gestión*)<sup>16</sup>, which is mandatory for Ecopetrol and the companies of the Group. Indicators are established there to measure performance on issues that incorporate ESG<sup>17</sup> material issues. In addition, at process level, indicators are also incorporated with the purpose of showing the performance of the areas in the management of HHRR matters, which are monitored periodically by the responsible area.

The follow-up of the above indicators is reinforced with the compliance of the Annual HHRR Plan, for which the indicator of compliance with the actions defined in the Company is also reported. The follow-up activity is performed on a quarterly basis by the Vice-Presidency of Corporate Affairs and General Secretariat through the Corporate Responsibility Management, based on the information provided by the responsible areas in accordance with the processes established in Ecopetrol. The monitoring of compliance with HHRR plans in the other companies of the Group must be done by the responsible areas in each of them, according to the process defined internally by each one.

<sup>15</sup> The purpose of the relationship model is to effectively articulate the companies of the Ecopetrol Group, aiming at their alignment and promoting valuable interactions. This model is embodied by functions that deploy management, control and service activities, which define the intensity with which Ecopetrol, as head of the Group, relates to the companies that comprise it.

<sup>16</sup> The progress of the TBG is reviewed by each vice-presidency within the framework of their Management Committees with the objective of identifying their contribution to the achievements or gaps of the TBG. Moreover, the status of the Group's TBG is reported monthly to the Corporate Vice-Presidency of Finance and Sustainable Value, to the Executive Committee (ExCo) and then to the Board of Directors.

<sup>17</sup> The material issues included for TBG 2024 are: Healthcare and safety, local development, water, climate change and human talent. It should be noted that they share a cross-cutting human rights approach.

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The indicators that are formulated to follow-up on HHRR matters are not static and may vary as considered.

### **3.6 GRIEVANCE MECHANISMS**

Ecopetrol has internal and external communication channels accessible to all stakeholders (See Annex B), as well as the other Group companies to which this Guide applies. All types of grievances are addressed through these channels, including those related to human rights. Rights holders who feel affected by Ecopetrol's business activity, including those derived from its commercial relationships, can use these channels to express their grievances.

The Ecopetrol Group acknowledges the judicial and non-judicial mechanisms established by the authorities to resolve disputes and reach a consensus. Those using the mechanisms provided are not required to waive their right to file a complaint through judicial or administrative proceedings as a prerequisite. Ecopetrol encourages its suppliers, partners and other allies to design and implement complaint channels that meet the effectiveness criteria established by the UNGPs.

### **3.7 OPERATIONAL-LEVEL REMEDY MECHANISMS**

In cases where Ecopetrol identifies that it has caused or contributed to adverse impacts on the human rights of others, the Company and its companies will provide, or cooperate reasonably in the compensation or remediation of impacts, through the operational grievance mechanisms provided or in the framework of any other legitimate process.

Regarding the controversies originated within the framework of its operation, notwithstanding the right of the community or any other stakeholder to have access to the administration of justice, Ecopetrol promotes the use of Alternative Dispute Resolution Mechanisms (ADR) which, in its case, as a company affiliated to the Ministry of Mines and Energy, must always be preceded by the fulfillment of the requirements of state responsibility and are subject to the control of the Attorney General's Office (*Procuraduría General de la Nación*) and the contentious-administrative jurisdiction.

### **3.8 GOVERNANCE**

The Board of Directors of Ecopetrol, as the Company's strategic guiding body, is regularly informed of relevant HHRR issues. This is how the Company ensures that HHRR are considered comprehensively in all business activity and strategy. They are also addressed in greater detail in the Corporate Governance and Sustainability Committee of the Board of Directors.


Considering the functions of Ecopetrol's Executive Committee and the Steering Committee, the Company defines the relevance of presenting relevant HHRR issues and the performance in this subject, based on the provisions of Notice 01 (Notice GOC-J-001), Likewise, HHRR performance may be followed up and brought to other instances for information purposes, such as the Segment Committees.

The Vice-Presidency of Corporate Affairs and General Secretariat, through Corporate Responsibility (GRT), is responsible for the governance and direction to advance HHRR in Ecopetrol. Both corporate and operational areas of the Company are responsible for advancing human rights in all business activity (see See Annex C).

### **3.9 REFERENCING**

Ecopetrol acknowledges the value of collaborative work to ensure advancing human rights in all its business activities. Thus, the Company, developing the principle of collaborative work, is part of various initiatives including IPIECA, the United Nations Global Compact, "Guías Colombia", and the Committee



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on Human Rights and Responsible Business Conduct of ANDI (Colombian National Industries Association), inter alia.

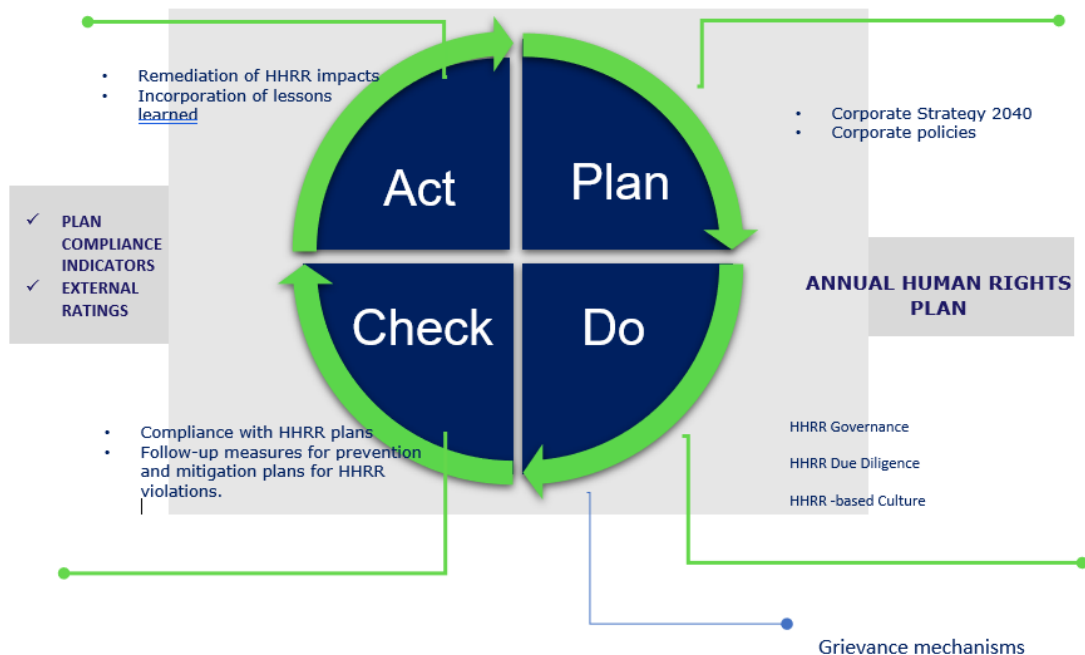
Ecopetrol is also part of the Hydrocarbons and Human Rights Group led by the Colombian Ministry of Mines and Energy.


### 3.10 REPORT

Ecopetrol discloses its HHRR management following best business practices in reporting. To this end, Ecopetrol takes into consideration high standards in this matter, as well as the guidance provided by the Vice-Presidency of Corporate Affairs and General Secretariat, through the Corporate Responsibility Management for such purposes.

## 4. ANNEXES


### A. PDCA CYCLE



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## B. COMMUNICATION CHANNELS

Stakeholders	Communication channels for filing complaints and claims
Employees, early retirees, retirees and their beneficiaries (EMP)	<ul style="list-style-type: none"> <li>- Human Rights Committee of the Collective Bargaining Agreement in Force.</li> <li>- Business partner (BP) for each of the business units</li> <li>- Citizen Participation Offices (OPC, from its name in Spanish) <a href="mailto:quejasysoluciones@ecopetrol.com.co">quejasysoluciones@ecopetrol.com.co</a></li> <li>- Labor Coexistence Committee</li> <li>- Health care hotline: National Toll-Free hotline / medical advice hotline: 018000915556. 24/7</li> <li>- Bogotá hotline: 2344333</li> <li>- Ethics hotline               <ul style="list-style-type: none"> <li>• <a href="http://lineaetica.ecopetrol.com.co">http://lineaetica.ecopetrol.com.co</a></li> <li>• International hotline (Free International Prefix) 018009121013</li> <li>• National hotline in Bogotá 2343900 or Extension 43900 for Ecopetrol's Employees.</li> <li>• Ethics and Compliance Office at Ecopetrol's main building in Bogota.</li> <li>• Ethical advisors nationwide.</li> </ul> </li> </ul>
Suppliers, contractors, and their employees (PRO)	<ul style="list-style-type: none"> <li>- Hotline 2345000 option 3 for suppliers, contractors of Ecopetrol</li> <li>- Bogotá hotline: 2344333</li> <li>- Email: <a href="mailto:relacionamiento.proveedores@ecopetrol.com.co">relacionamiento.proveedores@ecopetrol.com.co</a></li> <li>- Supplier's Meetings</li> </ul>
Society and community (SC)	<ul style="list-style-type: none"> <li>- Community development professionals leading the relationship with communities and local authorities in all areas of the operation.</li> <li>- Online form to submit grievances, complaints, claims, etc.</li> <li>- Email <a href="mailto:participacion.ciudadana@ecopetrol.com.co">participacion.ciudadana@ecopetrol.com.co</a> <a href="mailto:quejasysoluciones@ecopetrol.com.co">quejasysoluciones@ecopetrol.com.co</a></li> <li>- Corporate Call Center. Toll-free National hotline: 01 8000918418</li> <li>- Service brigades. Personalized attention in municipalities without the permanent presence of the Company.</li> <li>- Teleiguanas. Telephone booths that communicate directly with the corporate call center.</li> <li>- Personalized service offices located in different municipalities of the country.</li> </ul>
Customers and shareholders	<ul style="list-style-type: none"> <li>- Hotline 2345000 Option 1</li> <li>- Community Committees and Committees acting in their capacity as such.</li> </ul>


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### C. Governance




### PREVIOUS VERSIONS

Previous document			
Version	Date dd/mm/yy yy	Code and document 's name	Changes
1	29/05/2013	GRG-D-001, Directriz de Derechos Humanos (Human Rights Guideline)	<ul style="list-style-type: none"> <li>The document is adjusted in accordance with the document management guidelines.</li> <li>Changed the document type to Guideline.</li> <li>The terms defined in the glossary are extended.</li> <li>A detailed description of each of the phases for the implementation of the guideline is provided.</li> <li>A number of roles and responsibilities are included.</li> <li>The outline of the HR Management model is included.</li> </ul>
1	28/06/2019	SRC-G-002, Guía de Derechos Humanos y Empresa (Guide on Human Rights and Business)	<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>Code and version are updated according to the new system</li> <li>The international standards on which Ecopetrol advances human rights are reviewed.</li> </ul>


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	<b>Corporate Responsibility System</b> <b>Vice-Presidency of Corporate Affairs and General Secretariat</b>		
	<b>CODIGO</b> <b>GEE-G-035I</b>	<b>Elaborado</b> <b>14/03/2024</b>	<b>Versión: 3</b>

			<ul style="list-style-type: none"> <li>Principles for advancing human rights in business activity are incorporated.</li> <li>The scope of the document is defined for Ecopetrol Group.</li> </ul>
1	30/09/2021	Guía de Derechos Humanos y Empresas (Guide on Human Rights and Business)	<ul style="list-style-type: none"> <li>The document is adjusted in accordance with document management guidelines.</li> <li>The scope and application of the HHRR Guide are described.</li> <li>The Cultural Declaration is incorporated into the Development of the Guideline of HHRR and Business.</li> <li>The TESG strategy is incorporated into the Development of the HHRR and Business Guideline.</li> <li>Ecopetrol's commitment to respect HHRR is extended to their stakeholders and business partners.</li> <li>International standards to which Ecopetrol must adhere to advance human rights in its business activities are reviewed and added.</li> <li>The principle of Differential Approach is incorporated.</li> <li>A section on Governance was added to the description of the implementation of the Guideline, and the Company's strategy, direction, and guidelines on HHRR were developed.</li> <li>Ecopetrol's governance guideline is included.</li> <li>A section on Due Diligence was added to the description of the implementation of the Guideline.</li> <li>The outline of the human rights evaluation cycle is included.</li> <li>A detailed description of the annual HHRR plan and indicators is provided.</li> <li>A detailed description of the grievance and remediation mechanisms for the implementation of the Business and HHRR Guidelines is provided.</li> <li>A detailed description of the training and communication for the implementation of the Business and HHRR Guideline is provided.</li> <li>A detailed description for referencing the implementation of the Business and HHRR Guideline is provided.</li> <li>The description regarding Ecopetrol's reporting is adjusted within the implementation.</li> </ul>
2	28/02/2024		<ul style="list-style-type: none"> <li>The international standards on which the management of ECP in Human Rights will be carried out are reviewed.</li> </ul>

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			<ul style="list-style-type: none"> <li>• New commitments incorporated in accordance with International Finance Corporation (IFC) standards.</li> <li>• The commitment to the United Nations Declaration on Indigenous Peoples is incorporated.</li> <li>• The Escazú Agreement is mentioned as one of the regional agreements on HHRR that the Ecopetrol Group must take into account for its due diligence.</li> <li>• The commitment to the Convention on Biological Diversity and the United Nations General Assembly Resolution 76/300 on the human right to a healthy environment is incorporated.</li> <li>• The commitment to decent work is incorporated, emphasizing the rejection of modern slavery and trafficking in persons.</li> <li>• The Ecopetrol Group's commitment to the Paris Agreement is mentioned.</li> <li>• Ecopetrol's Human Rights Risk Management Cycle Guide is referred to in order to describe HHRR due diligence exercises.</li> <li>• The concept of just energy transition is incorporated as a fundamental element for the management of HHRR in Ecopetrol and as part of the public commitment to HHRR.</li> <li>• Clarification is provided on the application of the guidelines in accordance with the Company's relationship model.</li> <li>• The 2040 strategy and its relationship with HHRR is included.</li> <li>• The principle of reparation is included, bearing in mind the provisions of the UNGPs.</li> <li>• The Integrated Territorial Strategy is incorporated into related guidelines.</li> <li>• The significance of knowing the expectations and perceptions of subjects of special constitutional protection is emphasized.</li> <li>• The grievance mechanism is adjusted and extended to commercial relations.</li> </ul>
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NEW DOCUMENT		
Version	Date dd/mm/yy yy	Changes
3	14/03/2024	<ul style="list-style-type: none"> <li>• Some translation adjustments were made from the original Spanish version to the English version.</li> </ul>

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	<b>CODIGO GEE-G-035I</b>	<b>Elaborado 14/03/2024</b>	<b>Versión: 3</b>

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 Unit: Corporate Responsibility, Vice-Presidency of Corporate Affairs

The President **RICARDO ROA BARRAGÁN**, bearer of ID (C.C.) No. 19.451.246, approved the GEE-G-035 Guide on Human Rights and Business document, by email addressed to the Vice-Presidency of Corporate Affairs and General Secretariat. The President indicated that he had no additional remarks on the content of the document.

Electronically revised by:	Electronically approved by:
<b>MÓNICA ANDREA TANGARIFE PEDRAZA</b> <b>Corporate Responsibility Manager</b> ID (C.C.) 52.869.845 Vice-Presidency of Corporate Affairs and General Secretariat	<b>GERMÁN GONZÁLEZ REYES</b> <b>Vice-Presidency of Corporate Affairs and General Secretariat</b> ID (C.C.) 80.408313 Vice-Presidency of Corporate Affairs and General Secretariat
<i>Electronically signed document, in accordance with the provisions of Decree 2364/2012, which regulates Article 7 of Act 527/1999, regarding electronic signatures and other provisions.            The system generates an electronic report that evidences the traceability of the review and approval actions by the responsible parties to verify compliance with this mechanism. If you need to verify this information, please request this report to Service Desk.</i>	