

**Company Name** Ecopetrol  
**Industry** Extractives  
**UNGP Core Score (\*)** 11.0 out of 26

Score	Out of	For indicators
<b>Governance and Policy Commitments</b>		
1	2	A.1.1 Commitment to respect human rights
1	2	A.1.2 Commitment to respect the human rights of workers
1	2	A.1.4 Commitment to engage with stakeholders
0	2	A.1.5 Commitment to remedy
<b>Embedding respect and Human Rights Due Diligence</b>		
Embedding respect		
1	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
0.5	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
1	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
2	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0.5	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
<b>Remedies and Grievance Mechanisms</b>		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
1	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0.5	2	C.7 Remedying adverse impacts and incorporating lessons learned
<b>11.0</b>	<b>26</b>	

(\*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

## Detailed assessment

### Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: UNGC principles 1 &amp; 2: The Company is signatory to the UN Global Compact [UNGC Company site, N/A: <a href="http://unglobalcompact.org">unglobalcompact.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: UNGPs: The Company's 'objective is to ensure that the Company carries out its activities in compliance with the United Nations Guiding Principles on Business and Human Rights (UNGP)'. However, having the 'objective' to act 'in compliance with' is not considered a formal statement of commitment to the initiative according to CHRB wording criteria. [2019 Integrated Sustainable Management Report, 03/2020 &amp; Human Rights website, 30/04/2020: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Not met: OECD</li> </ul>
A.1.2	Commitment to respect the human rights of workers	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: UNGC principles 3-6: The Company is signatory to the UN Global Compact. [UNGC Company site, N/A: <a href="http://unglobalcompact.org">unglobalcompact.org</a>]</li> <li>• Met: Explicitly list All four ILO apply to EX BPs: According to the Company's website: 'The company's declarations and commitments in relation to the issue are contained in the Human Rights Guide (link to PDF), which includes a series of principles and rights: Freedom of association and collective bargaining. Elimination of forced and compulsory labor. Abolition of all forms of child labor. Elimination of discrimination in employment and occupation'. The Company's integrated report of 2016 states the following: 'The annex on human rights and corporate social responsibility was reviewed and updated for all Ecopetrol contracts. It sets out the clear commitment that contractors must make with regard to respecting human rights, as well as identifying, preventing, and mitigating situations that may potentially or actually affect the exercise of rights during the course of operations and the performance of their contractual obligations, in light of relationships with stakeholders'. [Our Commitment to Human Rights, 08/11/2014: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a> &amp; Management of Human Rights Information, 13/11/2014: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Explicit commitment to All four ILO Core: On its website, in the section Voluntary Adherences, the Company states it's a member of the Global Compact. However, on this new version of the website, it does not list commitments relating to child labour, forced labour, discrimination, freedom of association and collective bargaining. Additionally, in its Integrated Sustainable Management Report, the Company states it 'is committed to the absolute respect for the right of association and freedom of association in accordance with constitutional and legal parameters', however, no commitment to collective bargaining could be found. No formal commitments to the other ILO Core could be found. [Voluntary Adherences, 30/04/2020: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a> &amp; 2019 Integrated Sustainable Management Report, 03/2020]</li> <li>• Not met: Respect H&amp;S of workers: In its Code of Ethics and Conduct, the Company discloses the following: 'The company prioritizes safety at work and in the environment, to protect the integrity of people, facilities and areas where operations are performed.' However, no formal commitment to respect health and safety of workers could be found. [Code of Ethics, 04/2018: <a href="http://google.com">google.com</a>]</li> <li>• Not met: H&amp;S applies to EX BPs</li> </ul>
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Regular stakeholder engagement: The Company discloses the following in its Integrated Sustainable Management Report: 'In alignment with the ISO 26000 standard, stakeholder engagement establishes guidelines to promote responsible</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>business management by Ecopetrol with each of its seven stakeholders.' These include workers, customers, suppliers, and society and community. As an example of engagement, the Company discloses that 'the Secretary General periodically consults the perception and expectations of stakeholders. The Survey includes the stakeholders' appraisals of the economic, social and environmental issues'. [2019 Integrated Sustainable Management Report, 03/2020]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement: The Company states that 'mechanisms must be in place to properly receive and manage requests, complaints, claims and suggestions (PQRS for its Spanish acronym), ensuring a timely and thorough response. In the same manner, involvement scenarios are necessary, which offers the opportunity to learn about their expectations and to keep them informed regarding the activities performed by the Company. To effectively conduct this dialogue with stakeholders, Ecopetrol has Citizen Participation Offices (OPC for its Spanish acronym) that guarantee the rights of the interested parties to express their positions and concerns to the Company.'</li> </ul> <p>Additionally, The company formerly ran a Mobile Citizen Participation strategy aimed at stakeholder engagement and entry into new territories. This collected requests, claims and suggestions from the communities in which it operates. As of 2016, it is no longer operational. However, it is unclear if the Company regularly engages with stakeholders to design or monitor its human rights approach. [2019 Integrated Sustainable Management Report, 03/2020 &amp; Integrated Sustainable Management Report 2016, 07/2017: <a href="http://storagestreamcp.blob.core.windows.net">storagestreamcp.blob.core.windows.net</a>]</p>
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to remedy: The Company states that 'through this component Ecopetrol seeks to execute its activities in harmony with the needs of the communities and the development goals of the territorial entities. It also seeks for environmental handling programs and measures to be key elements in preventing negative impacts on the population and to prevent conflicts caused by the company's operations.' However, no evidence found of statement of commitment to remedy the adverse impact on individuals and workers. Conflicts due to water use and supply, tertiary roads, negative impacts on land and impacts on traditional economic activity, are specified. The application of these compensation activities upon extractives business partners is not specified. Nothing further could be found in the 2019 report. [2019 Integrated Sustainable Management Report, 03/2020 &amp; Integrated Sustainable Management Report 2017, June 2018: <a href="http://storagestreamcp.blob.core.windows.net">storagestreamcp.blob.core.windows.net</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with EX BPs to remedy impacts</li> </ul>

## Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to ILO core conventions: See indicator A.1.2. Signatory to the UNGC.</li> <li>• Met: Senior responsibility for HR: The Company indicates the following in its Business and Human Rights Policy: 'The Secretary General (SEG), through its Corporate Responsibility Department (CRD) and its mandate to use and implement the CRS and the Corporate Responsibility Strategy, provides strategic direction in HRs issues.' [Business and Human Rights Policy, 28/06/2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility</li> <li>• Not met: Day-to-day responsibility for EX BRs</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Identifying risks in own operations: The Company details that Comprehensive risk management in Ecopetrol is analysed at two levels: 1. Business risks and 2. Process risks. It also publishes a 'corporate risks map' that includes operational risks such as 'Incidents due to operational causes or natural events' and 'Ethical and compliance. However, these seems to refer to risks generally, and not particularly due diligence referring to human rights. Also, the Company's policy states the following: 'The CRD [Corpora Responsibility Department] periodically applies the HRs module in the stakeholders' perceptions and expectations study, in order to identify the expectations in this area and to manage them in a way that is 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.' However, it is not clear which is the process followed to identify human rights potential risks and impacts, company seems to refer to stakeholder &amp; expert consultation without additional details. [Business and Human Rights Policy, 28/06/2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a> &amp; Integrated Sustainable Management Report 2018, 06/2019: <a href="http://nuevoportal.ecopetrol.com.co">nuevoportal.ecopetrol.com.co</a>]</li> <li>• Not met: identifying risks in EX business partners: No evidence found in a current publicly available document of risk identification for extractive business partners. [Assurance, 28/10/2014: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification</li> <li>• Met: In consultation with stakeholders: As indicated above, the Company consults stakeholders in order to identify human rights risks. [Business and Human Rights Policy, 28/06/2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Met: In consultation with HR experts: The Company has worked with the Ideas para la Paz Foundation to analyze its human rights risks. [2019 Integrated Sustainable Management Report, 03/2020]</li> <li>• Not met: Triggered by new circumstances</li> <li>• Not met: Explains use of HRIAs or ESIA (inc HR)</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Salient risk assessment (and context): The Company's integrated report (prior to 2019) provides information regarding a materiality assessment conducted by the Company, the materiality assessment was conducted in consultation with stakeholders perceptions and expectations. The issues were then prioritised the issues considering the importance to Ecopetrol in a sustainability context, and their importance to stakeholders. The report provides a graph of material issues, grading them as per importance to the company and stakeholders against severity. The graph includes human rights and occupational health and safety as material risks (rated at 2.5 on a 0-3 scale. However, no details found of actual saliency assessment, including how social, geographical, economic or other factors were taken into account. The Company's 2019 Integrated Report provides evidence of analysis of risks across various geographies, stating 'In accordance with the principles defined in the Human Rights Guide (2019), Ecopetrol continued moving forward in its risk analysis by regional', including Central Regional, Orinoco Regional, and Eastern Regional, however, no description of the process or how these factors are taken into account could be found. [2019 Integrated Sustainable Management Report, 03/2020 &amp; Integrated Sustainable Management Report 2016, 07/2017: <a href="http://storagestreamecp.blob.core.windows.net">storagestreamecp.blob.core.windows.net</a>]</li> <li>• Met: Public disclosure of salient risks: The Company notes in its 2016 report an ongoing human rights risk of child labour and exploitation at operational sites and discloses action plans taken to address these risks and their progress. This includes NGOs (UNICEF) and the number of supplier parties involved, the details of the initiative and the number of activities that were taken out as a result of the plan. One result discussed regarded the inclusion of a new clause in code of conduct and supplier agreements. Separately, rights of association and trade union freedom, and security and human rights are other areas in which risks were identified and details are provided of actions taken. [Integrated Sustainable Management Report 2016, 07/2017: <a href="http://storagestreamecp.blob.core.windows.net">storagestreamecp.blob.core.windows.net</a> &amp; Integrated Sustainable Management Report 2018, 06/2019: <a href="http://nuevoportal.ecopetrol.com.co">nuevoportal.ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Action Plans to mitigate risks: The Company's Business and Human Rights Policy describes the following: 'To ensure that Ecopetrol properly manages HRs issues, the CRD will prepare an annual Human Rights Plan. The Plan will be part of the management instruments used within the CRS [Corporate Responsibility System]. This Plan will incorporate the actions defined with the areas in charge of managing relevant HRs issues; these areas will be responsible for implementing the Plan and for reporting on its progress. The Plan may incorporate actions which apply to the GE and guide the management of HRs of the Group's companies. Likewise, the Plan shall include cross-cutting actions of instruction, communication, and monitoring.' [Business and Human Rights Policy, 28/06/2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Not met: Including amongst EX BPs: See below. Company described actions taken for the different key issues. No more recent evidence found in latest reports regarding general system to mitigate human rights risks and impacts in extractive business partners. [Integrated Sustainable Management Report 2016, 07/2017: <a href="http://storagestreamcp.blob.core.windows.net">storagestreamcp.blob.core.windows.net</a> &amp; Integrated Sustainable Management Report 2018, 06/2019: <a href="http://nuevportal.ecopetrol.com.co">nuevportal.ecopetrol.com.co</a>]</li> <li>• Met: Example of Actions decided: The Company provides conclusions reached and actions taken on a range of risk areas. This includes child labour and sexual exploitation, right of association and trade union freedom and security and human rights. For example, the Company signed the Covenant for the prevention of the exploitation of children and adolescents, along with 20 of its contractors. This Covenant does the following: 'Promote scenarios for the communication and training for workers and collaborators for the prevention of exploitation. Incorporate into their codes of conduct a zero tolerance policy on the exploitation of children and adolescents. Report compliance with these commitments.' [Integrated Sustainable Management Report 2016, 07/2017: <a href="http://storagestreamcp.blob.core.windows.net">storagestreamcp.blob.core.windows.net</a> &amp; Integrated Sustainable Management Report 2018, 06/2019: <a href="http://nuevportal.ecopetrol.com.co">nuevportal.ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: System to check if Actions are effective</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Comms plan re identifying risks: See indicator B.2.1</li> <li>• Not met: Comms plan re assessing risks: See indicator B.2.2</li> <li>• Met: Comms plan re action plans for risks: See indicator B.2.3</li> <li>• Not met: Comms plan re reviewing action plans: See indicator B.2.4</li> <li>• Not met: Including EX business partners</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Responding to affected stakeholders concerns</li> <li>• Not met: Ensuring affected stakeholders can access communications</li> </ul>

## Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: The Company has an ethics line available to all employees and contractors. [2019 Integrated Sustainable Management Report, 03/2020]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved: The Company indicates in the integrated report: 'In 2019, 370 concerns and 329 consults were received (for a total of 699), seeking advice and guidance on ethical issues and how best to proceed in order to ensure compliance with the law and corporate ethical principles; 100% of these submissions were addressed. The main typologies were: ethical or conflicts of interest, due diligence of counterparts, compliance with internal rules and procedures. A total of 447 complaints were received, of which 296 were on ethical issues and 151 on compliance issues. The main typologies received were: breach of rules and procedures, disrespect and third parties faults. Of the cases addressed, 80% were found to be uncorroborated complaints. The remaining 20% were distributed as follows: 71% ethical, 19% third-party events and 10% compliance.' However, it is not clear how many complaints related to human rights were resolved or addressed. [2019 Integrated Sustainable Management Report, 03/2020]</li> <li>• Met: Channel is available in all appropriate languages: The line is available in Spanish, English, and Portuguese, which seem to cover all the official languages of the Company's operating countries. [2019 Integrated Sustainable Management Report, 03/2020]</li> <li>• Not met: Expect EX BPs to have equivalent grievance system</li> <li>• Not met: Opens own system to EX BPs workers</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism for community: The Company indicates the following: 'An adequate exercise of corporate responsibility implies the existence of communication channels that contribute towards maintaining and improving the relationship with stakeholders. For this, mechanisms must be in place to properly receive and manage requests, complaints, claims and suggestions (PQRS for its Spanish acronym), ensuring a timely and thorough response. In the same manner, involvement scenarios are necessary, which offers the opportunity to learn about their expectations and to keep them informed regarding the activities performed by the Company. To effectively conduct this dialogue with stakeholders, Ecopetrol has Citizen Participation Offices (OPC for its Spanish acronym) that guarantee the rights of the interested parties to express their positions and concerns to the Company.' These stakeholders include Society and Community. [2019 Integrated Sustainable Management Report, 03/2020]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages</li> <li>• Not met: Expects EX BPs to have community grievance systems</li> <li>• Not met: EX BPs communities use global system</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Describes how remedy has been provided: The Company indicates that 'During 2019, as part of the human rights risk assessment carried out in the Magdalena Medio region, special attention was paid to risks associated with populations in vulnerable situations, including children and adolescents. When the results are socialized in 2020, measures to prevent the risks identified will be established.' However, these measures have yet to be released. [2019 Integrated Sustainable Management Report, 03/2020]</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Changes introduced to stop repetition: The Company notes its work in preventing child labour and sexual exploitation resulted in new clauses being introduced to contracts, and describes work undertaken with 26 contractors to change transfer services. [Integrated Sustainable Management Report 2018, 06/2019: <a href="http://nuevoportal.ecopetrol.com.co">nuevoportal.ecopetrol.com.co</a> &amp; Integrated Sustainable Management Report 2016, 07/2017: <a href="http://storagestreamecp.blob.core.windows.net">storagestreamecp.blob.core.windows.net</a>]</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

## Performance: Responses to Serious Allegations (Not included in the overall score)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> <li>• <b>Headline:</b> Colombia's attorney general launches a probe into Ecopetrol oil spill in Santander province</li> <li>• <b>Area:</b> Environmental damage</li> <li>• <b>Story:</b> On April 2 2018, Colombia's attorney general's office announced the initiation of an investigation to determine whether officials from Ecopetrol could be held criminally responsible for an oil spill of 550 barrels in Santander province. According to Colombian authorities, the Lisama 158 well which was in the process of being shut down due to low production, leaked crude into a ravine over a three-week period. This reportedly resulted in killing more than 2,400 animals and affecting more than 1,000 trees. Hundreds of residents were evacuated in the rural areas of Santander province The spill has also depleted the livelihoods of fishing communities along Liazma and Sogamoso rivers, and a number of residents are being treated for dizziness, headaches and vomiting. The spill stretched over 24 kilometres in the Lizama River and 20 kilometres in the Sogamoso River. The company has been criticized by Colombia's National Environmental Licensing Authority (ANLA) for not having an effective contingency plan, for not providing an adequate emergency response given the magnitude of the leak and for failing to disclose the true magnitude of the event.</li> <li>• <b>Sources:</b> [Reuters - 03/04/2018: <a href="http://uk.reuters.com">uk.reuters.com</a>][BN Americas - 02/04/2018: <a href="http://subscriber.bnamericas.com">subscriber.bnamericas.com</a>][Ecowatch - 27/03/2018: <a href="http://ecowatch.com">ecowatch.com</a>][Smithsonian magazine - 03/04/2018: <a href="http://smithsonianmag.com">smithsonianmag.com</a>]</li> </ul>
E(1).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• <b>Met:</b> Public response available: The company's CEO Felipe Bayon Pardo told journalists the company would fully cooperate with all three investigations, he said "We will do everything necessary to re-establish environmental and social conditions in the area. It's our commitment and we will invest the human, financial and technological resources which are required." Mr. Bayon also argued that that seismic activity in the department of Santander on March 1 could be responsible for cracking the well and not technical failures. [Colombia's attorney general to investigate Ecopetrol oil spill, 02/04/2018: <a href="http://reuters.com">reuters.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• <b>Met:</b> Response goes into detail: Mr. Bayon said that a high-pressure relief unit, imported from the United States, will reduce pressure and allow engineers to cut the flow of hydrocarbons. Ecopetrol also reported it would install 17 control points, including barriers, dykes, and evacuation pools alongside the 20 kilometres of the Lizama river and 18 kilometre riverbank of the Sogamoso [Colombia's attorney general to investigate Ecopetrol oil spill, 02/04/2018: <a href="http://reuters.com">reuters.com</a>]</li> </ul>
E(1).2	The Company has appropriate policies in place	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• <b>Met:</b> Company policies address the general issues raised: The company's clean air and environmental commitment states "At Ecopetrol, corporate responsibility is an essential part of the corporate strategy, because it contributes to guarantee business sustainability by adding social and environmental dimensions to the value offer of the company. This principle is intended for the company to be in harmony and balance with the groups of interest and the environment." [Environment, 23/11/2014: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• <b>Not met:</b> Policies apply to the type of business relationships involved: The company's clean air and environment policy applies to Ecopetrol. There is no evidence the policy applies to suppliers. [Environment, 23/11/2014: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• <b>Not met:</b> Policies address the specific rights in question: There is no evidence that the company's policies address the specific rights in question.</li> </ul>
E(1).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• <b>Not met:</b> Engages with affected stakeholders: There is no evidence the company has engaged with affected stakeholders.</li> <li>• <b>Not met:</b> Encourages linked business to engage affected stakeholders: There is no evidence the company has encouraged linked businesses to engage with affected stakeholders.</li> <li>• <b>Not met:</b> Provides remedies to affected stakeholders: There is no evidence the company has provided remedies to affected stakeholders.</li> <li>• <b>Not met:</b> Has reviewed management systems to prevent recurrence: There is no evidence the company has reviewed management systems in light of the allegations. Following the spill, Ecopetrol indicated that it would cooperate with all</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>investigations. The company's CEO stated "We will do everything necessary to re-establish environmental and social conditions in the area. It's our commitment and we will invest the human, financial and technological resources which are required." Additionally, Ecopetrol has reported it would install 17 control points, including barriers, dykes, and evacuation pools alongside the 20 kilometres of the Lizama river and 18 kilometre riverbank of the Sogamoso.</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims: There is no evidence that the company has provided remedies to the victims.</li> <li>• Not met: Has improved systems and engaged affected stakeholders: There is no evidence that the company has improved systems and engaged affected stakeholders.</li> </ul>
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> <li>• Headline: woman union leader abducted and tortured</li> <li>• Area: FoA and CB</li> <li>• Story: Colombia's main oil workers union, USO, has denounced the recent attack on Dibeth Quintana, the latest in a string of incidents targeting her over trade union activity. On 13 February, Dibeth was abducted, bound, beaten and abandoned outside Aguachica in the department of Cesar. In a statement, USO accused police and security personnel at the state oil company Ecopetrol of targeting and harassing Dibeth and her family. USO has suffered high levels of political persecution over the years, with several members murdered, displaced, attacked and harassed.</li> <li>• Sources: [BHRRC - 25/02/2019: <a href="http://business-humanrights.org">business-humanrights.org</a>][Justice for Colombia - 18/2/2019: <a href="http://justiceforcolombia.org">justiceforcolombia.org</a>]</li> </ul>
E(2).1	The Company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Public response available</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Response goes into detail</li> </ul>
E(2).2	The Company has appropriate policies in place	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Company policies address the general issues raised: 'In the case of freedom of association, the company promotes respect for workers belonging to trade unions and provides them guarantees for their freedom of action by preventing situations of harassment or discrimination.' [Human Rights Practices, 13/11/2014: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Met: Policies apply to the type of business relationships involved: The Company's Human Rights guidelines which also cover the four ILO core labour standards are also part of contracts with business partners. This includes freedom of association. [Integrated Sustainable Management Report 2016, 07/2017: <a href="http://storagestreamecp.blob.core.windows.net">storagestreamecp.blob.core.windows.net</a> &amp; Our Commitment to Human Rights, 08/11/2014: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Policies address the specific rights in question: no discussion is provided around what measures are in place to guarantee non-retaliation against employees. The company only notes that it complies with and monitors agreements. [Human Rights Practices, 13/11/2014: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul>
E(2).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Engages with affected stakeholders</li> <li>• Not met: Encourages linked business to engage affected stakeholders</li> <li>• Not met: Provides remedies to affected stakeholders</li> <li>• Not met: Has reviewed management systems to prevent recurrence</li> <li>• Not met: Denies allegations, but has engaged affected stakeholders</li> <li>• Not met: Denies allegations, but reviewed systems to prevent such impacts</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims</li> <li>• Not met: Has improved systems and engaged affected stakeholders</li> <li>• Not met: Denies allegations, but implements review recommendations</li> <li>• Not met: Denies allegations, and ensures systems prevent such impacts</li> </ul>

## Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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