

**Company Name** Ecopetrol  
**Industry** Extractives  
**Overall Score (\*)** 40.4 out of 100

Theme Score	Out of	For Theme
1.7	10	A. Governance and Policies
16.4	25	B. Embedding Respect and Human Rights Due Diligence
2.5	15	C. Remedies and Grievance Mechanisms
8.8	20	D. Performance: Company Human Rights Practices
6.3	20	E. Performance: Responses to Serious Allegations
4.8	10	F. Transparency

(\*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also 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 2019 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

### A. Governance and Policies (10% of Total)

#### A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: General HRs commitment: The Integrated Sustainable Management Report states that the Company 'has declared its commitment to respect and promote human rights'. The report is signed off by the President of Eco petrol. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>Met: UNGC principles 1 &amp; 2: The Company Integrated Sustainable Management Report highlights and describes the 10 principles of the UNGC. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>Not met: International Bill of Rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: UNGPs</li> <li>Not met: OECD</li> </ul>
A.1.2	Commitment to respect the human rights of workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: ILO Core: The company discloses a commitment to human rights and undertakes to "Carry out all its business operations within the framework of respect for Human Rights and in accordance with the principles enshrined in the Constitution of Colombia and international laws and treaties such as the Universal Declaration of Human Rights, the American Convention on Human Rights, the declarations of the ILO, the United Nations Global Compact, and the Voluntary Principles on Security and Human Rights." However, this is only disclosed on the Company Website. [Our Commitment to Human Rights, 08/11/2014: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: UNGC principles 3-6: Ecopetrol joined the United Nations Global Compact in 2009. The Company also describes and lists the UNGC 10 principles in their integrated sustainability report. [Global Compact, 08/11/2014: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a> &amp; Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Met: Explicitly list All four ILO apply to EX BPs: The Company's Human Rights guidelines which also cover the four ILO core labour standards are also part of contracts with business partners. 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.' [Our Commitment to Human Rights, 08/11/2014: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a> &amp; Management of Human Rights Information, 03/11/2014: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Explicit commitment to All four ILO Core: In its website section 'Global Compact', the Company states its commitment to the respect of Human Rights: 'Ecopetrol formally joined the Global Compact in 2009 through a letter signed by the President of the company and addressed to the Secretary General of the United Nations, which expresses support for the Global Compact and its principles. The ten Global Compact principles are presented below: [...] Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining. Principle 4: Businesses should uphold the elimination of all forms of forced and compulsory labor. Principle 5: Businesses should uphold the effective abolition of child labor. Principle 6: Businesses should uphold the elimination of discrimination in respect of employment and occupation.' [Global Compact, 08/11/2014: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Not met: Respect H&amp;S of workers</li> <li>• Not met: H&amp;S applies to EX BPs</li> </ul>
A.1.3.EX	Commitment to respect human rights particularly relevant to the industry (EX)	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: Based on UN Instruments</li> <li>• Not met: Voluntary Principles (VPs) participant: The Company is states their commitment to the Voluntary Principles on Security and Human Rights. The Company states on their website 'since 2008, Ecopetrol has implemented a series of practices aimed at the application of the Voluntary Principles'. However, the Company is not an official corporate participant of the Voluntary Principles. [Voluntary Principles, 08/11/2014: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Not met: Uses only ICoCA members</li> <li>• Not met: Respecting indigenous rights: The company notes the importance of respecting indigenous rights and has committed to a code of conduct for their Gibraltar Gas Processing Plant as based on "respect for the cultural differences of the local population, both indigenous and settler, and the environmental protection of the project's area of influence." However, this information is disclosed on the Company's website and not in a formal policy document. [Ethnic Groups, 17/10/2014: <a href="https://ecopetrol.com.co">https://ecopetrol.com.co</a>]</li> <li>• Not met: ILO 169</li> <li>• Not met: UN Declaration on the Rights of Indigenous People (UNDRIP)</li> <li>• Not met: Expects BPs to respect these rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: FPIC commitment</li> <li>• Not met: Voluntary Guidelines on Tenure Rights</li> <li>• Not met: IFC performance standards</li> <li>• Not met: Zero tolerance for land grabs</li> <li>• Not met: Respecting the right to water: The Company states 'Responsible water resource management is critical to ensuring environmental protection and conservation and operational continuity of the various areas of the business'. It also notes its support of the CEO Water Mandate - Global Compact. However, the company is not listed on the CEO water mandate website and water rights are not specifically noted in its disclosures. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Not met: Expects BPs to commit to all these rights</li> </ul>
A.1.4	Commitment to engage with stakeholders	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: Regular stakeholder engagement: "The Company runs a stakeholder engagement plan which specifies the groups it engages with and the specific policies and issues discussed and measured against. The Company has detailed that they have identified 'seven stakeholders' shareholders and investors; customers;</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>partners; employees, pensioners and their beneficiaries; contractors and their employees; society and community, and the State. The Company then identifies the 'stakeholder subgroups' for the society and community - which includes NGOs, ethnic organisations and land owners. This information is detailed in the Company's integrated report.</p> <p>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. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Regular stakeholder design engagement: The stakeholder engagement plan for society and community specifically mentions compliance with human rights as per its tactical plan on human rights. The process through which company's actions are adjusted based on issues identified from stakeholder engagement is disclosed in the integrate report. The Company 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. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul>
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, there is no clear commitment to tackle with 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. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a> &amp; Integrated Sustainable Management Report 2017, June 2018: <a href="http://storagestreamecp.blob.core.windows.net">storagestreamecp.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>
A.1.6	Commitment to respect the rights of human rights defenders	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: Zero tolerance attacks on HRs Defenders (HRDs)</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Expects EX BPs to reflect company HRD commitments</li> </ul>

## A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	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: CEO or Board approves policy</li> <li>• Not met: Board level responsibility for HRs</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Speeches/letters by Board members or CEO</li> </ul>
A.2.2	Board discussions	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: Board/Committee review of salient HRs</li> <li>• Not met: Examples or trends re HR discussion</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both examples and process</li> </ul>
A.2.3	Incentives and performance management	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: Incentives for at least one board member</li> <li>• Not met: At least one key EX RH risk, beyond employee H&amp;S</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>

## B. Embedding Respect and Human Rights Due Diligence (25% of Total)

### B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Commits to ILO core conventions</li> <li>Not met: Senior responsibility for HR: A Human Rights Committee is discussed, but the relationship of this committee to the Board or Senior levels is not specified. [Human Rights Committee, 17/10/2014: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul> Score 2 <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>
B.1.2	Incentives and performance management	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Senior manager incentives for human rights: The variable compensation includes some H&amp;E components including fatalities, environmental incidents and ethical or disciplinary events. [Integrated Sustainable Management Report 2017, June 2018: <a href="http://storagestreamecp.blob.core.windows.net">storagestreamecp.blob.core.windows.net</a>]</li> <li>Not met: At least one key EX HR risk, beyond employee H&amp;S: The Company does discuss frequency rate as part of variable compensation. However, this does not extend to the health and safety of local communities or workers in the supply chain. Variable compensation is determined through Balanced Scorecards for senior management, however the specific content of the scorecards is not disclosed. Fixed compensation and general comments regarding assessment are disclosed in the integrated report. [Integrated Sustainable Management Report 2017, June 2018: <a href="http://storagestreamecp.blob.core.windows.net">storagestreamecp.blob.core.windows.net</a> &amp; Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Performance criteria made public: There is no disclosure of human rights beyond H&amp;S related to incentives for senior managers. [Integrated Sustainable Management Report 2017, June 2018: <a href="http://storagestreamecp.blob.core.windows.net">storagestreamecp.blob.core.windows.net</a>]</li> </ul>
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: HR risks is integrated as part of enterprise risk system</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Commits to ILO core conventions</li> <li>Met: Communicates its policy to all workers in own operations: The Company's sustainability agenda includes 'labour practices and human rights'. This agenda is communicated across the company's seven stakeholders - which includes employees at own operations. The Company's human rights policy covers core ILOs (covering all 10 UNGC principles) [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Met: Commits to all 4 ILO core conventions</li> <li>Met: Communication of policy commitments to stakeholder: The integrated report discusses the stakeholder engagement framework and notes that the company's human rights strategy is discussed. Society and community are one of the groups with which engagement occurs. The Company website and integrated report also discuss human rights commitments. Communication of human rights in local languages is not specifically discussed. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>Met: How policy commitments are made accessible to audience: The integrated report discusses the stakeholder engagement framework and notes that the Company's human rights strategy is discussed. Society and community are one of the groups with which engagement occurs. The Company website and integrated report also discuss human rights commitments. Ecopetrol performs an annual consultation regarding their perception in terms of general and specific attributes relating to corporate responsibility. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul>
B.1.4.b	Communication /dissemination of policy	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Commits to all 4 ILO core conventions for suppliers</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	commitment(s) to business relationships		<ul style="list-style-type: none"> <li>• Met: Communicating policy to EX contractors and joint ventures: The Company notes that supplier contracts and third party contracts include clauses requiring adherence to the Company's human rights commitments, specifying the UN Global Compact. A human rights evaluation is noted for completion among new partners, and reaffirmed each year for existing partners. The Company's human rights policy covers all ten UNGC principles (covers ILO). [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Met: Including to EX BPs (removed)</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How HR commitments made binding/contractual: The Company's integrated report notes that "100% of Ecopetrol's contracts include a specific human rights clause. Concerning agreements with partners, human rights clauses were included or were the object of analysis in four joint venture agreements." [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Met: Including on EX BPs: The Company's integrated report notes that "100% of Ecopetrol's contracts include a specific human rights clause. Concerning agreements with partners, in 2017 human rights clauses were included or were the object of analysis, in four joint venture agreements." [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul>
B.1.5	Training on 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: Scores at least 1 on A.1.2</li> <li>• Not met: Trains all workers on HR policy commitments: The stakeholder engagement plan notes that relevant stakeholder groups are notified of the human rights commitments, and employees, suppliers and third parties are provided with training. In addition, the Company disclose the number of employees who attended the training. However, it is not clear whether this covers all workers. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Met: Trains relevant EX managers including security personnel: The Company discloses the number of employees trained and the type of human rights training provided within its integrated report. It separately discloses specified training for security personnel and other specialised personnel regarding human rights. The Company discusses training of security personnel on human rights, and provides data on the number of relevant employees and contractors trained in the human rights policy. [Integrated Sustainable Management Report 2018, June 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: Score of 2 on A.1.2</li> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.1.6	Monitoring and corrective actions	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>• Met: Scores at least 1 on A.1.2</li> <li>• Met: Monitoring implementation of HR policy commitments: The Company measures quarterly indicators on its Tactical Plan on Human Rights and discloses the percentage of compliance. The number of human rights complaints recorded is also disclosed publicly. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Not met: Monitoring EX BP's</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Score of 2 on A.1.2</li> <li>• Not met: Describes corrective action process</li> <li>• Not met: Example of corrective action</li> <li>• Not met: Discloses % of EX supply chain monitored</li> </ul>
B.1.7	Engaging business relationships	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: HR affects selection EXs business partners: The Company website notes that joint venture contracts now include a clause on international Human Rights agreements which must be adhered to in order to proceed. It also notes that "All Ecopetrol contractors must declare their adherence to the company's Code of Ethics. Significant effects are attributed to this declaration within the contracts, because the Code qualifies as a contractual obligation, whose breach generates the application of the agreed sanction measures (Penalty clause for enforcement, early termination). Similarly, workers, contractors and third parties involved in the company's operations must know and accept the guidelines on corporate social responsibility (CSR) and the Human Rights Guide, which establish the company's rejection of child labor, and forced and compulsory labor." The company also has a</li> </ul> <p>Indicator Code Indicator name Score (out of 2) Explanation Supplier Rating System which includes a section on whether or not the supplier adheres to each of the ten</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>principles of the UN Global Compact. This adherence is evaluated and reaffirmed in every new contract (evaluation content is not provided) [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</p> <ul style="list-style-type: none"> <li>• Met: HR affects on-going EX business partner relationships: The company website notes that "Ecopetrol requires a commitment from its employees and contractors on Human Rights, the rejection of child labor, forced labor, and discrimination in employment, through various means. In the first instance, through the Code of Ethics, which is a formal and institutional reference for personal and professional conduct." It also notes that "All Ecopetrol contractors must declare their adherence to the company's Code of Ethics. Significant effects are attributed to this declaration within the contracts, because the Code qualifies as a contractual obligation, whose breach generates the application of the agreed sanction measures (Penalty clause for enforcement, early termination). Similarly, workers, contractors and third parties involved in the company's operations must know and accept the guidelines on corporate social responsibility (CSR) and the Human Rights Guide, which establish the company's rejection of child labor, and forced and compulsory labor." The company also has a Supplier Rating System which includes a section on whether or not the supplier adheres to each of the ten principles of the UN Global Compact. This adherence is evaluated and reaffirmed in every new contract (evaluation content is not provided). [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirement under score 1 met: See above. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Met: Working with EX business partners to improve performance: In addition, the Company indicates that it 'worked jointly with the GRI on designing the Sustainable Development Plan for Providers, oriented toward creating strategies for the sustainable development of Ecopetrol's suppliers, through training and monitoring in the process of preparing sustainability reports. The project is aimed at ensuring that Ecopetrol's small and medium sized suppliers acquire a greater level of maturity in matters of sustainability and human rights' [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul>
B.1.8	Approach to engagement with potentially affected stakeholders	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: Stakeholder process or systems: The Company's stakeholder engagement program with society and community explicitly mentions human rights and measures compliance with the tactical plan on human rights as a percentage. Values, objectives, indicators, and the results of consultations from the stakeholder management plan are disclosed in detail. The integrated report provides details on how the stakeholder engagement framework includes indicators on human rights. Stakeholder feedback against these indicators is disclosed, including survey responses against individual elements of the tactical plan, and the results are used to adjust the corporate responsibility model. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Met: Frequency and triggers for engagement: The integrated report provides details on how the stakeholder engagement framework includes indicators on human rights. Stakeholder feedback against these indicators is disclosed, including survey responses against individual elements of the tactical plan, and the results are used to adjust the corporate responsibility model. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Met: Engagement includes EX business partners workers: The integrated reports provides the details of the engagement methodology for suppliers and discloses the number of summits the Company had with suppliers. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Not met: Engagement includes EX business partners communities: The stakeholder groups identified include landowners, employees and beneficiaries, but does not specify communities affected by the supply chain.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Analysis of stakeholder views and company's actions on them: The company discloses a comprehensive stakeholder engagement program including assessment of its human rights strategy and comments provided by stakeholders with regards to key human rights risks. The results, and how they inform work focus areas for the following year, are provided. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul>

## B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	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: Identifying risks in own operations: The Company details in their integrated Sustainable Management Report, the Company details that Comprehensive risk management in Ecopetrol is analysed at two levels: 1. Business risks and 2. Process risks. The Company also publishes a 'corporate risks map' that includes operational risks such as 'Incidents due to operational causes or natural events' and 'Ethical and compliance. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Met: identifying risks in EX business partners: The company website notes that "All Ecopetrol contractors must declare their adherence to the company's Code of Ethics. Significant effects are attributed to this declaration within the contracts, because the Code qualifies as a contractual obligation, whose breach generates the application of the agreed sanction measures (Penalty clause for enforcement, early termination). Similarly, workers, contractors and third parties involved in the company's operations must know and accept the guidelines on corporate social responsibility (CSR) and the Human Rights Guide, which establish the company's rejection of child labor, and forced and compulsory labor." The company also has a Supplier Rating System which includes a section on whether or not the supplier adheres to each of the ten principles of the UN Global Compact. This adherence is evaluated and reaffirmed in every new contract (evaluation content is not provided). [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: The company discloses a comprehensive stakeholder engagement program including assessment of its human rights strategy and comments provided by stakeholders with regards to key human rights risks. The results, and how they inform work focus areas for the following year, are provided. Separately, the company also discloses situations in which external NGOs have been involved in initiatives to address human rights concerns. [Assurance, 28/10/2014: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Met: In consultation with HR experts: Grassroots organisations and "ethnic organisations" are included in stakeholder engagement. State and Judicial courts are also included in the stakeholder engagement plan, and the company discloses summaries of cases they have taken to court for decision. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Not met: Triggered by new circumstances [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</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)	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: Salient risk assessment (and context): The Company's integrated report 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). [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Met: Public disclosure of salient risks: The Company notes 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 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met: See above</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 notes 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 and action plans developed. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Met: Including amongst EX BPs: In 2018, the pilot assessment of human rights were introduced for suppliers within Ecopetrol's strategic lines and 60 companies participated. The Company intends to continue this assessment in the following years. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">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. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">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>• Met: Comms plan re identifying risks: The Company has communicated on its website and in the integrated report how it has a system to identify human rights risks and impacts including own operations and business partners (see b.2.1). [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a> &amp; Assurance, 28/10/2014: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Met: Comms plan re assessing risks: The Company has communicated in its integrated sustainable management report how it has a system to assess which are its human rights issues, including a disclosure of these (see b.2.2).</li> <li>• Not met: Comms plan re action plans for risks</li> <li>• Not met: Comms plan re reviewing action plans</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>

### C. Remedies and Grievance Mechanisms (15% of Total)

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. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Number grievances filed, addressed or resolved: The integrated report provides details on the number of human rights complaints made in relation to the Tactical Plan for Human Rights. This includes the level of escalation, and the responsible department, as well as the stage at which the complaint is in relation to resolution. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Not met: Channel is available in all appropriate languages: It is not clear whether the channel is accessible in all appropriate languages.</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Opens own system to EX BPs workers: The Company does not states that extractives business partners must have grievance mechanisms or that the company's mechanisms are open to EX Business partners. [Integrated Sustainable Management Report 2017, June 2018: <a href="http://storagestreamecp.blob.core.windows.net">storagestreamecp.blob.core.windows.net</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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: Grievance mechanism for community: The Company indicates that it has various channels to report the breaches of the Code of Ethics through telephone or email and they are available for worker, contractor, shareholder or citizen. However, there is no information regarding the reporting system that covers the issues outside the Code of Ethics. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</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: 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: Aside from the Contractor Work Service Scheme, there is no description of how external individuals can use the company's channels.</li> </ul>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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 users to create or assess system</li> <li>• Not met: Description of how they do this</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Engages with users on system performance</li> <li>• Not met: Provides user engagement example on performance</li> <li>• Not met: EX BPs consult users in creation or assessment</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	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: Response timescales: The company does not disclose who handles human rights complaints. A Human Rights Committee is discussed, but their responsibilities and the escalation of issues to the committee is not explained.</li> <li>• Not met: How complainants will be informed</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Escalation to senior/independent level</li> </ul>
C.5	Commitment to non-retaliation over complaints or concerns made	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>• Met: Public statement prohibiting retaliation: The company's Code of Ethics notes that retaliation against those who inform about breaches of the Code will not be accepted. The Code notes that "workers who inform about the breach of the Code will not be able to receive any kind of reprisals. Those who take action against said collaborators will have to face the corresponding disciplinary actions."</li> <li>• Not met: Practical measures to prevent retaliation</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Has not retaliated in practice</li> <li>• Not met: Expects EX BPs to prohibit retaliation</li> </ul>
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	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: Won't impede state based mechanisms</li> <li>• Not met: Complainants not asked to waive rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Will work with state based or non judicial mechanisms</li> <li>• Not met: Example of issue resolved (if applicable)</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 notes 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. The company does not explain how this human rights concern arose from the human rights risk detection mechanisms, or that this initiative was provided as a remedy. Human rights risks identified, and</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>remedied, are not explicitly stated otherwise. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</p> <ul style="list-style-type: none"> <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 that 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, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a> &amp; Integrated Sustainable Management Report, 2016: <a href="http://ecopetrol.com.co">ecopetrol.com.co</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>

### D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	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: Living wage target timeframe or achieved</li> <li>• Not met: Describes how living wage determined: With regards to wages, the company notes that "The legal monthly minimum wage in force (SMLV) in Colombia for 2018 was \$781,242. " However, no discussion of living wages was identified. [Integrated Sustainable Management Report 2018, June 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: Pays living wages</li> <li>• Not met: Reviews livings wages definition with unions</li> </ul>
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	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>• Not met: Member of EITI: The Company notes that it is a participant in the Extractive Industries Transparency Initiative and discusses the progress made with respect to the relevant governments in the areas in which it operates. However, the Company is not listed as an EITI Supporting Company on the EITI Website. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Met: Reports of taxes and revenues beyond legal minimums: The company discloses taxes paid to the State and territorial agencies by year and type. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Reports taxes and revenue by country: The company discloses taxes paid to the State and territorial agencies by year and type. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Met: Steps taken re non EITI countries: The Company states that "Consistent with its commitment to transparency and to combating corruption, Ecopetrol participates actively in the Extractive Industries Transparency Initiative (EITI) in Colombia." "In 2017, Ecopetrol formed part of the National Tripartite Committee and the Technical Support Group, where it contributed to developing the initiative's work plan for the 2017 – 2018 period and preparation of the EITI Report corresponding to fiscal year 2016. " [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a> &amp; Integrated Sustainable Management Report 2017, June 2018: <a href="http://storagestreamecp.blob.core.windows.net">storagestreamecp.blob.core.windows.net</a>]</li> <li>• Not met: Disclosures contract terms where not a requirement</li> </ul>
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	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: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: The integrated report discloses that the company will act within the framework of respect for the right of association and trade union freedom. It also notes the unions that it's members are a part of and the percentage of workers that were part of a union or covered by a collective bargaining agreement. No discussion is provided around what commitments are made to non-retaliation against employees. The company only notes that it complies with and monitors agreements. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Met: Discloses % covered by collective bargaining: The integrated report discloses the percentage of workers covered by collective bargaining agreements as well as the unions to which employees belong. The Company discloses that 50.4% of workers were members of a union. At the same date, the current Collective Bargaining Agreement applied to 77.7% of workers at Ecopetrol S.A. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not met: Both requirement under score 1 met
D.3.4	Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Injury Rate disclosures: The company discloses Occupational Accident Frequent Rate in its integrated report. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a> ] • Met: Lost days or near miss disclosures: The company discloses absenteeism rates in its integrated report. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a> ] • Met: Fatalities disclosures: The company discloses fatalities in its integrated report. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a> ] Score 2 • Met: Set targets for H&S performance: The Company discloses its performance against Health and Safety as a material issue within its sustainability processes, providing the average rating against the importance level. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a> ] • Met: Met targets or explains why not: The Company provides detailed analysis of its health and safety incidents - including an analysis of targets in their integrated sustainable management report. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a> ]
D.3.5	Indigenous peoples rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Process to identify indigenous rights holders: The Company's integrated report discusses that a Procedure for ethnic group management is in place at the company. It also notes that activities in new areas are preceded by a discussion with the Ministry of the Interior to identify ethnic groups in the area and the Ministry provides direction on the communities that need to be consulted. The Company then proceeds with consultations, and determines indigenous reserves and lands certified to Community Councils. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a> ] • Not met: How engages with communities in assessment: The company provides information on the communities that have been consulted and the stage of consultation, but there is no explanation of how indigenous communities are engaged in assessment outside of the regular stakeholder engagement program. Score 2 • Not met: Commits to FPIC (or ICMM) • Not met: Gives recent example FPIC or dropping deal
D.3.6	Land rights (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Approach to identification of land tenure rights holders: The Company's integrated report notes that activities in new areas are preceded by a discussion with the Ministry of the Interior to identify ethnic groups in the area and the Ministry provides direction on the communities that need to be consulted. The company then proceeds with consultations, and determines indigenous reserves and lands certified to Community Councils. No discussion of the processes regarding identification of legitimate land tenure holders is provided otherwise. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a> ] • Not met: Describes approach to doing so if no recent deals Score 2 • Not met: How valuation and compensation works: No details are disclosed regarding how valuation and compensation works. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a> ] • Not met: Steps to meet IFC PS 5 in state deals • Not met: Describes approach if no recent deals
D.3.7	Security (in own extractive operations, which includes JVs)	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: How implements security (inc VPs or ICOC): The integrated report notes that private security contractors undergo training on the Voluntary Principles on Security and Human Rights. No requirements are disclosed for extractives business partners to enforce the voluntary principles in their human rights and security training. For example, the Company states that 'In 2017, three training rounds were held in Ecopetrol's Southern, Caribbean and Orinoquia regions, in which 39 direct employees and 109 contractors from the company's physical security area participated.' [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a> & Integrated Sustainable Management Report 2017, June 2018: <a href="http://storagestreamecp.blob.core.windows.net">storagestreamecp.blob.core.windows.net</a> ]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Example of respecting HRs in security</li> <li>• Not met: Ensures Business Partners follow security approach</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Assesses and involves communities</li> <li>• Not met: Working with local community</li> </ul>
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Action to prevent water and sanitation risks: The company is a member of the CEO Water Mandate. It outlines a range of initiatives regarding water supply and protection of water supply across several locations of operation. Water reuse programs, produced water and general sanitation investments are detailed. Key water risks are briefly identified. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Water targets considering local factors: The Company states that it is making contributions to the goals that have been set out by public policies and guidelines, however, the Company does not have its own targets. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Not met: Reports progress in meeting targets and shows trends in progress made</li> </ul>

### E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> <li>• Headline: Colombia's attorney general launches a probe into Ecopetrol oil spill in Santander province</li> <li>• Area: Environmental damage</li> <li>• Story: 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>• Sources: [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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: 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> Score 2 <ul style="list-style-type: none"> <li>• Met: 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</li> </ul>
E(1).2	The Company has appropriate policies in place	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: 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> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: 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> Score 2 <ul style="list-style-type: none"> <li>• Not met: 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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Engages with affected stakeholders: There is no evidence the company has engaged with affected stakeholders.</li> <li>• Not met: Encourages linked business to engage affected stakeholders: There is no evidence the company has encouraged linked businesses to engage with affected stakeholders.</li> <li>• Not met: Provides remedies to affected stakeholders: There is no evidence the company has provided remedies to affected stakeholders.</li> <li>• Not met: 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 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.</li> </ul> Score 2 <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>

## F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	2.42 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, Ecopetrol made data public that met one or more elements of the methodology in 23 cases, leading to a disclosure score of 2.42 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> <li>• Met: Company reports on GRI: The Company maps their Integrated Sustainable Management Report to the GRI G4 Standards. This document includes a GRI Index. [Integrated Sustainable Management Report 2018, June 2019: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Not met: Company reports on SASB</li> <li>• Not met: Company reports on UNGPRF</li> </ul>
F.3	Key, High Quality Disclosures	0.4 out of 4	Ecopetrol met 1 of the 10 thresholds listed below and therefore gets 0.4 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.2 : Board discussions</li> <li>• Not met: Score 2 for B.1.6 : Monitoring and corrective actions</li> <li>• Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers</li> <li>• Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s)</li> </ul> Discussing challenges openly <ul style="list-style-type: none"> <li>• Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</li> <li>• Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned</li> </ul> Demonstrating a forward focus <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.3 : Incentives and performance management</li> <li>• Not met: Score 2 for B.1.2 : Incentives and performance management</li> <li>• Not met: Score 1 for D.3.1 : Living wage (in own extractive operations, which includes JVs)</li> <li>• Met: Score 2 for D.3.4 : Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)</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 2019 Key Findings report and technical annex for more details of the research process.

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As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.