

**Corporate Human Rights Benchmark  
2023 Company Scorecard**

**Company name**      Ecopetrol  
**Sector**                Extractives  
**Overall score**        37.9 out of 100

Theme score	Out of	For theme
3.6	10	A. Governance and Policy Commitments
9.8	25	B. Embedding Respect and Human Rights Due Diligence
6.5	20	C. Remedies and Grievance Mechanisms
10.4	25	D. Performance: Company Human Rights Practices
7.6	20	E. Performance: Responses to Serious Allegations

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 2022 Methodology document for the sector concerned. 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 Policy Commitments (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	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: International Bill of Human Rights: The Guide on Human Rights and Business indicates: 'Ecopetrol commits to respect and advance HHRR and requires that its employees and suppliers abide by this commitment in the execution of their business activities. [...] Ecopetrol reaffirms its commitment to respect HHRR as set forth in the International Bill of Human Rights'. The webpage section Human Rights indicates: 'The Guide on Human Rights and Business reflects Ecopetrol Group's commitment to respecting and promoting Human Rights in the development of its activities and within the framework of its relations with stakeholders. [...] Ecopetrol encourages its business partners to operate respecting and advancing human rights, and in compliance with its Guide on Human Rights and Business'. This documents seems to supersede the previous Human Rights policy. [Guide on Human Rights and Business, 06/04/2022: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [Human Rights website, 28/03/2022: <a href="https://ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Commitment to UNGPs: The Guide on Human Rights and Business indicates: 'Ecopetrol adheres to the United Nations Guiding Principles on Business and Human Rights [...] and the OECD Guidelines for Multinational Enterprises'. See above. [Guide on Human Rights and Business, 06/04/2022: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [Human Rights website, 28/03/2022: <a href="https://ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	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: Commitment to ILO core principles: The Guide on Human Rights and Business indicates: 'Ecopetrol reaffirms its commitment to respect HHRR as set forth in [...] the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work'. [Guide on Human Rights and Business, 06/04/2022: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Met: Explicitly lists all four ILO core principles: The Company states in its Code of Ethics and Conduct that '[...] requires compliance with the law, which means that the company is committed to abide by applicable local and international regulations regarding fair labor practices and human rights, including prohibition of forced or child labor'. The Guide on Human Rights and Business indicates: 'Ecopetrol's commitment to respect HHRR encompasses all internationally recognized rights. However, within the framework of its business activities and its contractual and commercial relations, Ecopetrol acts proactively and in a differentiated manner to respect and promote the following rights and freedoms: [...] Freedom of association and collective bargaining, [...] Children's rights, Right to equality and non-discrimination [...]'. [Code of Ethics, 04/2018: <a href="google.com">google.com</a>] &amp; [Guide on Human Rights and Business, 06/04/2022: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Expects BPs/JVs to commit to ILO core principles: See above. The Code of ethics, in its FAQs section, indicates that 'Keep in mind that the Code of Ethics and Conduct is applicable to [...] persons who, regardless of their corporate or individual nature, have any relationship with Ecopetrol. This includes [...] contractors, suppliers, agents, partners, allies and clients, as well as to personnel and companies that the contractors engage in the execution of the contracted activities, as applicable'. However, no evidence found of commitment to ILO Declaration or explicit commitment to each ILO core area of fundamental rights in this document. The Guide on Human Rights and Business indicates: 'Ecopetrol commits to respect and advance HHRR and requires that its employees and suppliers abide by this commitment in the execution of their business activities. Additionally, Ecopetrol promotes the implementation of its commitment by its partners and other actors with whom it has contractual or commercial relations, especially in the framework of the activities that are carried out jointly. Ecopetrol reaffirms its commitment to respect HHRR as set forth in the International Bill of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work'. However, 'promote' is not considered a formal statement of commitment according to CHRB wording criteria. It is not clear it expects business partners to comply with ILO core principles. [Code of Ethics, 04/2018: <a href="google.com">google.com</a>] &amp; [Guide on Human Rights and Business, 06/04/2022: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Not Met: Explicitly lists all four ILO core principles for BPs/JVs: See above. The Code of ethics, which applies to business partners, states the following: 'In particular, the principles of respect and commitment to life commit the company to guarantee the defence and promotion of human rights, to prevent discrimination, and to comply with the HSE norms. Furthermore, this Code requires compliance with the law, which means that the company is committed to abide by applicable local and international regulations regarding fair labor practices and human rights, including prohibition of forced or child labor'. No further details found, including a requirement for extractive business partners to respect freedom of association and collective bargaining. The Guide for Labor Aspects and Conditions in Activities Contracted by Ecopetrol notes: 'ECOPETROL adhered to the Global Compact, which, among its Ten Principles, includes the following four labor standards: Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining'. It adds: 'Ecopetrol commits to respect and advance HHRR and requires that its employees and suppliers abide by this commitment in the execution of their business activities. Additionally, Ecopetrol promotes the implementation of its commitment by its partners and other actors with whom it has contractual or commercial relations, especially in the framework of the activities that are carried out jointly. However, 'promote' is not considered a formal statement of commitment according to CHRB wording criteria. It is not clear it expects business partners to commit to uphold the freedom of association and collective bargaining. [Code of Ethics, 04/2018: <a href="google.com">google.com</a>] &amp; [Guide for labor aspects in activities contracted by Ecopetrol, 26/01/2022: <a href="saauecprdrpecp.blob.core.windows.net">saauecprdrpecp.blob.core.windows.net</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	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: Commitment to respect H&amp;S of workers: The Guide on Human Rights and Business indicates: 'Ecopetrol's commitment to respect HHRR encompasses all internationally recognized rights. However, within the framework of its business activities and its contractual and commercial relations, Ecopetrol acts proactively and in a differentiated manner to respect and promote the following rights and freedoms: [...] Right to occupational health and safety'. The Comprehensive Policy notes: 'Commitment to life, environmental protection and the prevention of injuries and illnesses are present in all our activities. As a result, we make every effort to protect people's lives and the environment by applying appropriate occupational health and safety standards, while we care for the environment and ensure the sustainability of the operations'. [Guide on Human Rights and Business, 06/04/2022: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [Comprehensive Policy, N/A: <a href="saauecprdpcepc.blob.core.windows.net">saauecprdpcepc.blob.core.windows.net</a>]</li> <li>• Not Met: Commitment to ILO working hours standards or 48 hour regular work week</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Expects BPs/JVs to commit to H&amp;S of workers: See above. The Guide on Human Rights and Business indicates: 'Ecopetrol commits to respect and advance HHRR and requires that its employees and suppliers abide by this commitment in the execution of their business activities. Additionally, Ecopetrol promotes the implementation of its commitment by its partners and other actors with whom it has contractual or commercial relations, especially in the framework of the activities that are carried out jointly'. However, 'promote' is not considered a formal statement of commitment according to CHRB wording criteria. It is not clear it expects business partners to commit to health and safety of their workers. [Guide on Human Rights and Business, 06/04/2022: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Not Met: Expects BPs/JVs to commit to ILO working hours standards or 48 hour regular work week</li> </ul>
A.1.3.a.EX	Commitment to respect human rights particularly relevant to the sector – land, natural resources and indigenous peoples' rights (EX)	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: Commitment to respect land ownership/natural resources as in VGGT: The Social Settings Management Strategy indicates: 'ECOPETROL and its Business Group will seek to improve the accessibility and land connectivity conditions necessary for the communities in the areas of their interest, in order to promote commercial exchange'. It also explains its profitsharing policy in the context of the benefits for commercial extraction of hydrocarbons. However, no evidence found of a commitment to respect ownership/use of land and natural resources and respect legitimate tenure rights as set out in the relevant part(s) of the Voluntary Guidelines on the Responsible Governance of Tenure of Land (VGGT) to recognize the importance of communities' right to access to land and other natural resources. Alternatively, it could be according to the IFC Performance Standards. Moreover, commitments are expected to be placed in formal policy documents. [Social Settings Management Strategy, 12/03/2020: <a href="ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Not Met: Commitment to respect land ownership/natural resources as in IFC Performance Standards: The Guide on Human Rights and Business indicates: 'The Company is also committed to following the provisions of the Voluntary Principles on Security and Human Rights, the ILO's 169 Convention, and the International Finance Corporation's (IFC) Performance Standard 7: Indigenous Peoples'. Although the Company commits to follow the IFC Performance Standard 7, this subindicator would look for a commitment to the IFC Performance Standard 5 [Land Acquisition and Involuntary Resettlement]. The Procedure for people's resettlement in furtherance of operations and projects notes that among its reference regulations is the 'Manual for Preparation of the Resettlement Plan of the International Finance Corporation (IFC)'. Finally, the webpage section Land rights adds: 'Ecopetrol has a procedure in place for population resettlement, based on the United Nations Guiding Principles on Business and Human Rights - PRNU, and international policies on population resettlement: [...] the Manual for the preparation of the resettlement plan of the International Finance Corporation – IFC'. However, no publicly available policy statement found committing it to respect ownership/use of land and natural resources and respect legitimate tenure rights related to the ownership and use of land and natural resources as set out in the IFC Performance Standards. Moreover, commitments are expected to be placed in formal policy documents. [Guide on Human Rights and Business, 06/04/2022: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [Procedure for people's resettlement in furtherance of operations and projects, 30/11/2019: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Commitment to respect indigenous rights or ILO No.169 or UN Declaration: The Guide on Human Rights and Business indicates: 'The Company is also committed to following the provisions of [...] the ILO's 169 Convention, and the International Finance Corporation's (IFC) Performance Standard 7: Indigenous Peoples'. [Guide on Human Rights and Business, 06/04/2022: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Not Met: Expects EX BPs to make these commitments: The Guide on Human Rights and Business indicates: 'Ecopetrol commits to respect and advance HHRR and requires that its employees and suppliers abide by this commitment in the execution of their business activities. Additionally, Ecopetrol promotes the implementation of its commitment by its partners and other actors with whom it has contractual or commercial relations, especially in the framework of the activities that are carried out jointly'. Although the Company indicates it requires suppliers to abide by the commitment to respect and advance HHRR and it promotes the implementation of its commitment by its partners, it is not clear it expects business partners to commit to respect ownership/use of land and natural resource as set out in the VGGT or the IFC Performance Standards. Business Partners are also expected to respecting indigenous peoples' rights or references the relevant part(s) of the ILO Convention on Indigenous and Tribal Peoples No.169 or of the UN Declaration on the Rights of Indigenous Peoples. [Guide on Human Rights and Business, 06/04/2022: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>] Score 2</li> <li>• Not Met: Commitment to obtain FPIC or zero tolerance to land grabbing: The Integrated report indicates that the 'the relationship approach [for engaging with indigenous peoples] includes, among others': [...] Free, Prior and Informed Consent. The Guide on ethnic community relations indicates: indicates: 'The right to participate is assured for ethnic communities through a differentiated approach, in the application of the processes of Prior Consultation and in the occupation of popularly elected positions in the legislative bodies. The Prior Consultation is a space for agreement where the communities, in the presence of their representative authorities, have the opportunity to learn and understand the projects, works, or activities that are to be carried out in their territories, as well as their phases, concrete actions and the changes (or impacts) that could be done in their communities. In the same way, it could be a space for the agreement of administrative or legislative acts that directly affect them. Based on this information, the community can evaluate the potential impacts and participate in the formulation of measures for their management. They can also propose prevention, mitigation, and compensation measures considering their knowledge of the social setting, their concept of development, and their priorities regarding the future of the community'. The webpage section Ethnic Information adds: 'The prior consultation is performed to comply with legal and environmental regulations, as well as to seek concerted and informed agreements with indigenous and Afro-Colombian communities, managing the impact of projects that respect the cultural heritage they represent. In Colombia, the Constitutional Court, through Judgment Su-123 of 2018, has established that prior, free, and informed consent is necessary for the execution of projects that involve any of the situations established by the Constitutional Court'. However, no publicly available policy statement committing it to respecting ownership/use of land and natural resources which also includes a commitment to obtain the free prior and informed consent (FPIC) from indigenous peoples and local communities for transaction(s) involving land and natural resources found (even if was established as necessary by the Constitutional Court in Colombia, this subindicator looks for an explicit commitment from the Company to obtain FPIC whether in Colombia or abroad). Alternatively, the Company could commit to a zero tolerance for land grabbing. Moreover, commitments are expected to be placed in formal policy documents. [Integrated Sustainable Management Report 2021, 2021: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [Guide on ethnic community relations(Ecopetrol S.A.), 06/12/2021: <a href="saaeuecprdrpecp.blob.core.windows.net">saaeuecprdrpecp.blob.core.windows.net</a>]</li> <li>• Met: Commitment to respect the right to water: The Company participates in the CEO Water Mandate and Water Coalition for Colombia and it states that 'Currently, the water security initiatives promoted by Ecopetrol are part of the Water Action Hub, the global collaboration and knowledge exchange platform for water sustainability and climate resilience'. The webpage section Sustainability and water security in the environment reaffirms it: 'Since 2014, Ecopetrol has been publicly committed to sustainable water management through its adherence to the CEO Water Mandate initiative, promoted by the United Nations Global Compact'. Although webpages and reports are not a considered a suitable source according to CHRb approach, being a member to the CEO Water Mandate is considered a proxy</li> </ul>

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			<p>for this subindicator. [Integrated Sustainable Management Report 2021, 2021: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [Sustainability and water security in the environment_web, 10/02/2023: <a href="https://ecopetrol.com.co">ecopetrol.com.co</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Expects EX BPs to make these commitments: See above. The Guide on Human Rights and Business indicates: 'Ecopetrol commits to respect and advance HHRR and requires that its employees and suppliers abide by this commitment in the execution of their business activities. Additionally, Ecopetrol promotes the implementation of its commitment by its partners and other actors with whom it has contractual or commercial relations, especially in the framework of the activities that are carried out jointly'. Although the Company indicates it requires suppliers to abide by the commitment to respect and advance HHRR and it promotes the implementation of its commitment by its partners, it is not clear it expects business partners to commit to respect the water to water and to respect ownership/use of land and natural resources also to include a commitment to obtain the free prior and informed consent (FPIC) from indigenous peoples and local communities for transaction(s) involving land and natural resources or to a zero tolerance for land grabbing. [Guide on Human Rights and Business, 06/04/2022: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul>
A.1.3.b.EX	Commitment to respect human rights particularly relevant to the sector – security (EX)	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: Commitment to Voluntary Principles on Security and HRs: The Guide on Human Rights and Business indicates: 'The Company is also committed to following the provisions of the Voluntary Principles on Security and Human Rights'. [Guide on Human Rights and Business, 06/04/2022: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Not Met: Commits to International Humanitarian Law: The Guide on Human Rights and Business indicates: 'Given that some of the areas where Ecopetrol operates are affected by conflict, a situation that increases the risk that the Company, its suppliers, partners, and other stakeholders with whom it maintains relationships may be involved in HHRR abuses, Ecopetrol will intensify its due diligence and promote strong due diligence in its value chain. For these cases, Ecopetrol will rely on the competent institutions in each of the jurisdictions where they operate, so they reinforce their human rights due diligence process with relevant information to determine, prevent, and address the main human rights and International Humanitarian Law (IHL) risks, based on all applicable legislation'. However, this subindicator looks for a publicly available policy statement committing it to respect international humanitarian law (IHL). No further evidence found. [Guide on Human Rights and Business, 06/04/2022: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Expects EX BPs to commit to these rights: See above. The Guide on Human Rights and Business indicates: 'Ecopetrol commits to respect and advance HHRR and requires that its employees and suppliers abide by this commitment in the execution of their business activities. Additionally, Ecopetrol promotes the implementation of its commitment by its partners and other actors with whom it has contractual or commercial relations, especially in the framework of the activities that are carried out jointly'. However, 'promote' is not considered a formal statement of commitment according to CHRB wording criteria. It is not clear it expects business partners to respect the Voluntary Principles on Security and Human Rights (VPs) or to only uses security providers who are members of the International Code of Conduct of Private Security Providers Association (ICoCA) as well as to commit to respect international humanitarian law (IHL). [Guide on Human Rights and Business, 06/04/2022: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul>
A.1.4	Commitment to remedy	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: Commitment to remedy adverse HRs impacts: The Guide on Human Rights and Business indicates: 'In cases where Ecopetrol identifies that it has caused or contributed to adverse impacts on the human rights of others, the Company and its companies will provide, or reasonably cooperate in the compensation or remediation of impacts, through the operational grievance mechanisms provided or in the framework of any other legitimate process'. The Code of ethics states that 'These principles and regulations reflect the commitment to prevent and, when necessary, remedy the negative impacts generated by the operation on human rights'. [Code of Ethics, 04/2018: <a href="https://google.com">google.com</a>] &amp; [Guide on Human Rights and Business, 06/04/2022: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Met: Expects EX BPs to make this commitments: The Code of ethics applies to business partners: 'Keep in mind that the Code of Ethics and Conduct is applicable to [...] persons who, regardless of their corporate or individual nature, have any relationship with Ecopetrol. This includes [...] contractors, suppliers, agents, partners, allies and clients, as well as to personnel and companies that the</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>contractors engage in the execution of the contracted activities, as applicable'. The Company provided feedback to CHRB regarding this indicator, however, key evidence [from other source] was already in use. [Code of Ethics, 04/2018: <a href="http://google.com">google.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to collaborate with judicial or non-judicial mechanisms: The Guide on Human Rights and Business indicates: 'Ecopetrol S.A. has internal and external communication channels accessible to all stakeholders. Likewise do other Group companies to which this Guide applies. All types of grievances are addressed through these channels, including those related to human rights. Rights holders who feel affected by Ecopetrol's business activity can use these channels to express their grievances. Ecopetrol acknowledges that access to these communication channels is neither a condition nor an impediment for those who consider themselves affected, to resort to mechanisms provided by the State for handling grievances and claims. Therefore, those who use such communication channels are not required to waive their right to file a claim through judicial or administrative processes, as a precondition for filing their claims'. However, no policy statement committing it to collaborating with both judicial or non-judicial mechanisms to provide access to remedy found. [Guide on Human Rights and Business, 06/04/2022: <a href="http://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Not Met: Commitment to work with EX BPs on remedy: The Guide on Human Rights and Business indicates: 'Ecopetrol commits to respect and advance HHRR and requires that its employees and suppliers abide by this commitment in the execution of their business activities. Additionally, Ecopetrol promotes the implementation of its commitment by its partners and other actors with whom it has contractual or commercial relations, especially in the framework of the activities that are carried out jointly. [...] Given that some of the areas where Ecopetrol operates are affected by conflict, a situation that increases the risk that the Company, its suppliers, partners, and other stakeholders with whom it maintains relationships may be involved in HHRR abuses, Ecopetrol will intensify its due diligence and promote strong due diligence in its value chain'. Although the Company indicates it requires suppliers to abide by the commitment to respect and advance HHRR and it promotes the implementation of its commitment by its partners, as well as intensify its due diligence and promote strong due diligence, no commitment to work with business partners to remedy adverse impacts which are directly linked to the Company's operations, products or services found. [Guide on Human Rights and Business, 06/04/2022: <a href="http://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul>
A.1.5	Commitment to respect the rights of human rights defenders	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: Zero tolerance of threats/attacks on HRDs: There is a 'Commitment to Respect Human Rights Defenders' document where the Company states that '[...] rejects any action that directly or indirectly contributes to threats, physical damage, or any other circumstance that prevents the free, safe, and legitimate exercise of the work of Human Rights defenders'. [Policy on Human Rights Defenders, N/A: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Met: Expects BPs to make this commitment: The Company states that '[...] promotes and expects its partners, throughout the supply chain, to assume and implement this same policy and urges them to carry-out continuous management processes to face their responsibility to respect Human Rights and reject any direct or indirect action that may threaten or affect life, physical integrity, or the free exercise of the right to defend Human Rights.' [Policy on Human Rights Defenders, N/A: <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: Commitment to working with HRDs to create safe and enabling environment: The Company states that 'In development of the principle of complementarity established in its Human Rights Policy, Ecopetrol acts jointly with the State to ensure that it protects and guarantees the work of defenders'. However, this subindicator looks for a commitment to work with human rights defenders to create safe and enabling environments for civic engagement and human rights at local, national or international levels. No further evidence found. [Policy on Human Rights Defenders, N/A: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul>

## A.2 Board Level Accountability (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	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: Board level responsibility for HRs: The Guide on Human Rights and Business indicates: 'The Board of Directors of Ecopetrol S.A., as the Company's strategic guiding body, is regularly informed of relevant HHRR issues. [...] They are also addressed in greater detail in the Corporate Governance and Sustainability Committee of the Board of Directors'. The 2022 Integrated Management Report notes: 'the Corporate Governance and Sustainability Committee is in charge of analyzing the sustainability agenda adopted by Ecopetrol and the Ecopetrol Group. Human Rights are a relevant issue [...] Accordingly, this Committee is also responsible for Human Rights management and the progress made in this regard'. [Guide on Human Rights and Business, 06/04/2022: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [2022 Integrated Management Report, 2023: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Not Met: Describes HRs expertise of Board member: The Company has provided comments to CHRB regarding this indicator on the duties of the Corporate Governance and Sustainability Committee [see above], however, this subindicator looks for a description of the human rights expertise of the Board member or Board committee tasked with that governance oversight. No further evidence found. [2022 Integrated Management Report, 2023: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Board member/CEO signal importance of HRs in their communications: The Company's CEO states, in the webpage section Human Rights: 'Human Rights at Ecopetrol begin in each one of us, in our homes, in our workplace, in the spaces for dialogue with communities, in every action of our operation. As a company "From All to All" we recognize, among others, diversity and inclusion, we seek the safety of our employees, and we promote the Sustainable Development Goals'. The webpage also indicates: 'The Guide on Human Rights and Business reflects Ecopetrol Group's commitment to respecting and promoting Human Rights in the development of its activities and within the framework of its relations with stakeholders'. The 2022 Integrated Management Report discloses the message from the CEO: 'We also wish to highlight the work of the companies under the Ecopetrol Group, which procured goods and services totalling COP 32.6 trillion in 2022, of which 5 TRILLION COP were contracted with local suppliers and generated more than 130 thousand jobs, including the hiring of more than 28,000 people with disabilities, members of ethnic groups, victims of armed conflict, and people in their first jobs. This demonstrates the contribution and importance of the Group to the local economy and its commitment to the promotion of human rights, inclusion, and business development in Colombia'. As for the Message from the Chairman of the Board of Directors to the Stakeholders, it includes: 'Today, we are proud to show our stakeholders that we continue to lead by example, and that our commitment to Colombia and the world is ever-present in all our actions: In safeguarding life, as expressed in our cultural principle of "Life First," honoring it with tangible and historical results in the reduction of our accident rates. In protecting the environment, [...] In the importance we place on local development and employment to contribute to improving the quality of life of the population and closing socioeconomic gaps. In the undertaking of responsible, safe, and efficient operations, and in decision-making following rigorous corporate governance processes and practices focused on generating value. [...] All of the above, within the framework of building trust and harmonious relationships with our stakeholders, based on ethics, transparency, respect, and the promotion of human rights'. However, no communication found where Board members or the CEO clearly signal the Company's commitment to human rights, discussing why human rights matter to the business or any challenges to respecting human rights encountered by the business. [Human Rights website, 28/03/2022: <a href="https://ecopetrol.com.co">ecopetrol.com.co</a>] &amp; [2022 Integrated Management Report, 2023: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul>
A.2.2	Board responsibility	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: Process to review HRs strategy at board level: The Guide on Human Rights and Business indicates: 'The Board of Directors of Ecopetrol S.A., as the Company's strategic guiding body, is regularly informed of relevant HHRR issues. This is how the Company ensures that HHRR are considered comprehensively in all business activity and strategy. They are also addressed in greater detail in the Corporate Governance and Sustainability Committee of the Board of Directors. The Board of Directors of Ecopetrol S.A. receives quarterly reports on human rights performance'. The Internal Regulations of the Corporate Governance and Sustainability Committee adds: 'For the effective fulfilment of its duties, the Corporate Governance Committee will meet ordinarily at least three (3) times a</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>year, and extraordinarily when convened by the Board of Directors, by any of the Committee members, by the President of the Company or by the Chairman of the Board of Directors'. The Committee's duties include: 'Prepare the annual management report of the Committee, to be included in the Integrated Sustainable Management Report'. The 2022 Integrated Management Report notes that '[the Corporate Governance and Sustainability Committee] Committee has reviewed the strategy, trends, and progress made in the area of Human Rights, as well as the critical issues arising from the due diligence exercises carried out periodically'. The Human Rights Risk Management Cycle Guide adds that the following roles and responsibilities are established. The Board of Directors, Audit and Risk Committee and the Presidency have the following responsibilities: 'Communicate the commitment to respect human rights by means of the following actions: Adopting a commitment or public declaration to respect human rights. Ensuring that the variable of not affecting HHRR is considered in the definition of the strategic risks of the organization'. The Corporate Governance and Sustainability Committee of the Board of Directors 'Review[s] and follow[s] up HHRR risk management, at their strategic and process level'. [Guide on Human Rights and Business, 06/04/2022: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [Internal Regulations of the Corporate Governance and Sustainability Committee, 25/09/2020: <a href="https://ecopetrol.com.co">ecopetrol.com.co</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Example of HRs issues/trends discussed in last reporting period: The 2021 Integrated Sustainable Management Report states that 'The Committees of the Board of Directors are bodies that support the discussions conducted by the Board of Directors. The General Counsel organizes the topics according to the corresponding matter and assigns them to the different Support Committees of the Board of Directors according to their competence, in line with the provisions set forth in the corresponding internal regulations. These Committees are created and appointed by the Board itself and at least one of the members of each committee must be independent. The main objective of these Board Committees is to review the issues that the Board of Directors should be aware of in advance and issue recommendations'. The 2022 Integrated Management Report discloses topics discussed by the different Board Committees in 2022. The discussions of the Corporate Governance and Sustainability Committee included: 'Progress made on the Human Rights strategy in 2022'. However, no further detail found, such as clarifying what human rights issues have been discussed. [Integrated Sustainable Management Report 2021, 2021: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [2022 Integrated Management Report, 2023: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Describes how affected stakeholders / HRs experts inform board discussions: The Human Rights Risk Management Cycle Guide notes: 'As a starting point, in relation to the external information, the following relevant information should be available: [...] The information collected in previously conducted baseline surveys, audits, environmental analyses, or HHRR risk analyses must be considered, as it may be relevant for identification and assessment purposes'. The 2022 Integrated Management Report provides further explanation on the Human Rights Risk Management Cycle, including the different phases, stages and actions it is composed of. It also contains information on its Human Rights risk mitigation plans: 'Prevention and mitigation actions are taken in Ecopetrol's operations in order to prevent or mitigate negative impacts on rightsholders'. It includes 'Block of rights: society and local communities', which, entails [among other aspects] the right to information and citizen participation and the right to prior consultation. However, no description found of how the experiences of affected stakeholders or external human rights experts informed Board level discussions related to human rights. [Human Rights Risk Management Cycle Guide, 26/01/2022: <a href="https://saauecprdrpecp.blob.core.windows.net">saauecprdrpecp.blob.core.windows.net</a>] &amp; [2022 Integrated Management Report, 2023: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</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: At least one board member incentive linked to HRs commitments: The 2022 Integrated Management Report notes: 'The Company's public commitment, contained in the Human Rights and Business Guide, is cross-cutting to all work teams at the strategic, tactical, and operating levels, and extends to all rights internationally recognized [...] The guide establishes that the Ecopetrol Group is committed to respecting Human Rights, and requires that its workers and suppliers abide by this commitment for the performance of their activities. It also promotes adoption among its partners, associates, and other players with whom the Group engages in contractual or commercial relationships, especially within</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>the framework of the activities undertaken jointly with the Company'. However, this subindicator looks for evidence that one Board member has an incentive or performance management scheme linked to the Company's human rights policy commitment(s) or strategy. No further evidence found.</p> <ul style="list-style-type: none"> <li>• Not Met: Incentive scheme linked to key HRs risks beyond employee H&amp;S</li> <li>Score 2</li> <li>• Not Met: Performance criteria linked to HRs made public</li> <li>• Not Met: Review of other board incentives for coherence with HRs policies</li> </ul>
A.2.4	Business model strategy and risks	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 process to review business model and strategy for HRs risks: The Guide on Human Rights and Business indicates: 'The Board of Directors of Ecopetrol S.A., as the Company's strategic guiding body, is regularly informed of relevant HHRR issues. This is how the Company ensures that HHRR are considered comprehensively in all business activity and strategy. They are also addressed in greater detail in the Corporate Governance and Sustainability Committee of the Board of Directors. The Board of Directors of Ecopetrol S.A. receives quarterly reports on human rights performance'. The Human Rights Risk Management Cycle Guide notes: 'HHRR risk management in the companies of Ecopetrol Group is framed under the leadership and commitment of the Board of Directors, the President, and the Senior Management Committees. The Board of Directors, the Audit and Risk Committee (or whoever takes its place in each company of the Group), the President, the leading area of the Integrated Risk Management System, Corporate Responsibility as the HHRR risk management area, and the areas that manage them, are each assigned supervision, execution, and reporting responsibilities'. It adds that the following roles and responsibilities are established. The Board of Directors, Audit and Risk Committee and the Presidency have the following responsibilities: 'Communicate the commitment to respect human rights by means of the following actions: Adopting a commitment or public declaration to respect human rights. Ensuring that the variable of not affecting HHRR is considered in the definition of the strategic risks of the organization'. The Corporate Governance and Sustainability Committee of the Board of Directors 'Review[s] and follow[s] up HHRR risk management, at their strategic and process level'. However, although it indicates that Board of Directors, Audit and Risk Committee and the Presidency must ensure Ensuring that the variable of not affecting HHRR is considered in the definition of the strategic risks of the organization, it is not clear the process it has in place to discuss and review its business model and strategy for inherent risks to human rights at board level or a Board Committee. This indicator focuses on the Company business model or strategy adaptation rather than focusing on the risk. [Guide on Human Rights and Business, 06/04/2022: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [Human Rights Risk Management Cycle Guide, 26/01/2022: <a href="saaeuecprdpcep.blob.core.windows.net">saaeuecprdpcep.blob.core.windows.net</a>]</li> <li>• Not Met: Describes frequency and triggers for reviewing business model: The 2022 Integrated Management Report notes: 'the Corporate Governance and Sustainability Committee is in charge of analyzing the sustainability agenda adopted by Ecopetrol and the Ecopetrol Group. Human Rights are a relevant issue for all Stakeholder Groups and are cross-cutting to the TEG pillar under the Ecopetrol Group's 2040 Strategy. Accordingly, this Committee is also responsible for Human Rights management and the progress made in this regard'. Also, the Report discloses the topics discussed in 2022 by the different Committees. As for the Corporate Governance and Sustainability Committee, it includes: 'Progress made on the Human Rights strategy in 2022'. However, this subindicator looks for a description of the frequency of and triggers for reviewing its business model or strategy and potential impacts on human rights. No further evidence found. [2022 Integrated Management Report, 2023: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>Score 2</li> <li>• Not Met: Meets both requirements under score 1: See above.</li> <li>• Not Met: Example of actions resulting from reviews</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	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: Score of 1 on A.1.2.a</li> <li>• Met: Senior responsibility for HRs implementation and decision making: The Guide on Human Rights and Business indicates: ‘The Secretary General, through Corporate Responsibility (GRT), is responsible for the governance and direction to advance HHRR in Ecopetrol. Both corporate and operational areas of the Company are responsible for advancing human rights in all business activity (for instance, identification and management of operational HHRR risks). [...] The annual HHRR plan is the tool that ensures the adequate application of the human rights Guideline. The preparation, monitoring, and assessment of this plan for Ecopetrol S.A. are led by Corporate Responsibility, in collaboration with other areas of the organization’. According to the 2022 Integrated Management Report, the Secretary General is part of the Senior Management. [Guide on Human Rights and Business, 06/04/2022: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [2022 Integrated Management Report, 2023: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes day-to-day responsibility for implementing HRs commitments: See above. The annual HHRR plan is the tool that ensures the adequate application of the human rights Guideline. The preparation, monitoring, and assessment of this plan for Ecopetrol S.A. are led by Corporate Responsibility, in collaboration with other areas of the organization’. According to the 2022 Integrated Management Report, the Secretary General is part of the Senior Management.</li> </ul> <p>[Human Rights Risk Management Cycle Guide, 26/01/2022: <a href="saaeuecprdpcep.blob.core.windows.net">saaeuecprdpcep.blob.core.windows.net</a>]</p> <ul style="list-style-type: none"> <li>• Met: Day-to-day resources and expertise allocation in own operations: Also, the Human Rights Risk Management Cycle Guide discloses a table which shows the person responsible for management in accordance to the risk assessment, with risks varying from one to four. If the risk is four, the person responsible for it is ‘The Vice President or General Manager approves the risk analysis and the actions to be taken’. If it is three: ‘The General Manager, Technical Manager, Production Manager, Maintenance Manager, Project Manager, directors, superintendents, or department managers approve the risk analysis and the actions to be taken’. When the risk is level two: ‘Coordinators, the project leader, the plant shutdown leader, or the supervisor approve risk analysis and actions to be taken’. For level one risks: ‘The controls are applied directly by the officer in charge, according to their responsibilities, and reports to the higher level’. It adds: ‘In the event of level 3 or level 4 risks, HHRR risk management reports must be submitted in this phase at least twice a year to stakeholders, especially the GRT [Corporate Responsibility Management] and the parties responsible for the analyzed system, process, project, or operation, and their corresponding counterparts in the other companies of Ecopetrol Group’. It adds: ‘Likewise, Corporate Responsibility provides guidelines for the implementation of HHRR elements described in this Guide, and other documents directly related to the subject through Ecopetrol’s Relationship Model. The implementation and operation of these guidelines is the responsibility of the areas leading HHRR in each company’. [Human Rights Risk Management Cycle Guide, 26/01/2022: <a href="saaeuecprdpcep.blob.core.windows.net">saaeuecprdpcep.blob.core.windows.net</a>] &amp; [Guide on Human Rights and Business, 06/04/2022: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Not Met: Resources and expertise allocation with EX BPs</li> </ul>
B.1.2	Incentives and performance management	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: Senior manager incentives linked to HRs commitments: The Guide on Human Rights and Business indicates: ‘Ecopetrol establishes on an annual basis, the relevant indicators to account for how it is advancing human rights in its business activity. These are defined in the Company’s balanced Scorecard and are subject to periodic monitoring in the corresponding committees for each vice-presidency. The information on the behavior of each vice-presidency is recorded in the business performance tool and feeds Ecopetrol’s human rights evaluation cycle. The following are common indicators for measuring business human rights performance: Right to life, integrity, and decent working conditions: Total Recordable Injuries Frequency – TRIF Climate change and water [...]’. The 2022 Integrated Management Report explains the remuneration of the members of</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Senior Executives: 'The CEO's total compensation at Ecopetrol S.A.'s consists of an estimated ratio of 40% fixed compensation and 60% variable compensation'. It adds that 'To reinforce the risk culture, the Company contemplates indicators that affect variable compensation on an annual basis, as part of the performance evaluation at all hierarchical levels: HSE: Fatalities or environmental incidents (5% to 10%)'. The 2022 Integrated Management Report adds on senior remuneration: 'Ecopetrol's compensation scheme includes two (2) components associated with the achievement of business results: (i) Short-term variable compensation payable to the entire team of direct workers based on the achievement of the strategic objectives defined in the Ecopetrol Group's Balanced Management Board - TBG. (ii) Long-term incentives payable to management and some critical positions associated with the achievement of long-term objectives that guarantee the sustainability and protect the value and future of the Company. [...] For 2022, the Ecopetrol Group's TBG integrates the relevant topics of the Business Plan and reflects the main focuses aligned with the strategic challenges and the Declaration of Culture of the Group, prioritized as follows: Life first – HSE (10%)'. [2022 Integrated Management Report, 2023: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [Integrated Sustainable Management Report 2021, 2021: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Incentive scheme linked to key HRs risks beyond employee H&amp;S: See above. However, it is not clear it also includes health and safety of local communities and workers of extractives business partners. The Guide on Human Rights and Business indicates: 'Ecopetrol establishes on an annual basis, the relevant indicators to account for how it is advancing human rights in its business activity'. It includes Total Recordable Injuries Frequency – TRIF and Water Reuse. Although HSE is part of senior management incentive scheme, it is not clear how water reuse is. [2022 Integrated Management Report, 2023: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [Guide on Human Rights and Business, 06/04/2022: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Performance criteria linked to HRs made public: See above. The Company explains the different types of senior management incentives, the criteria linking the senior managers' remuneration to HSE performance: '10% HSE' in 2022 or 'HSE: Fatalities or environmental incidents (5% to 10%)' in 2021. [2022 Integrated Management Report, 2023: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [Integrated Sustainable Management Report 2021, 2021: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Not Met: Review of other senior management incentives for coherence with HRs policies: The 2021 Integrated Management Report discloses information on senior management remuneration: '40% fixed compensation and 60% variable compensation', with HSE metrics. However, no evidence found that it has reviewed other senior management performance incentives to ensure coherence with its human rights policy commitment. [Integrated Sustainable Management Report 2021, 2021: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul>
B.1.3	Integration with enterprise risk management	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: HRs risks integrated as part of enterprise risk system: The Company has a 'Human Rights Risk Management Cycle Guide' and it states that 'In accordance with the reference framework of the Integrated Risk Management System - SRI and the single risk management cycle, for the specific case, this document describes the specific characteristics of human rights risk management [...] The Company further details that its process for human rights risks management, which is as an integrated part of the Company risk system. has the following stages: communication, planning, identification, evaluation, treatment, monitoring, recording and reporting. [Human Rights Risk Management Cycle Guide, 26/01/2022: <a href="https://saauecprdrpecp.blob.core.windows.net">saauecprdrpecp.blob.core.windows.net</a>]</li> <li>• Not Met: Provides an example: The Company has provided comments to CHRB regarding this indicator. However, its content has not been found in publicly available sources.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Risk assesment by Audit Committee or independent third party: Regarding its Human Rights Assessment, the 2022 Integrated Management Report notes: 'As part of its due diligence efforts, Ecopetrol identified and evaluated possible impacts and risks associated with respect for Human Rights in its own activities, and also in the supply chain and other commercial relationships. [...] This evaluation allowed Ecopetrol to identify risks and create action plans for prevention and treatment, while also covering the analysis of the rights expressly recognized by the Company in its Human Rights Guide, including the right to life and personal integrity, the right to a dignified life, the right to a healthy environment and to health, access to information and participation, among others'. However, this subindicator looks for a description of how it assesses the adequacy</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			of the enterprise risk management system specifically in managing human rights during the Company's last reporting year. The assessment is expected to either be overseen by the Board Audit Committee or conducted by an independent third party. [2022 Integrated Management Report, 2023: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a> ]
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	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>• Met: Score of 1 on A.1.2.a</li> <li>• Not Met: Communicates HRs policies to all workers in own operations: The 2022 Integrated Management Report notes: 'Ecopetrol conducts annual training on Human Rights for its Stakeholder Groups, including government bodies, personnel, suppliers, and partners. They address internal policies and the commitment to respect human rights at Ecopetrol, as well as issues related to the UNGPs, the ILO Tripartite Declaration, and other labor issues, including decent work and the prevention of forced labor. [...] More than 8,600 workers trained through Ecopetrol's virtual course on Human Rights and Business [...] Human Rights training was provided to approximately 1,200 workers [...] emphasizing Human Rights due diligence, respect for social leaders, and the commitment to respect Human Rights in the Company'. The webpage section Human Rights states: 'Ecopetrol raises awareness and provides training in human rights. This ensures respecting and advancing human rights throughout its operations, supply chain, and other business relationships. In the process of raising awareness and training in Human Rights, Ecopetrol has e-learning tools through which it helps workers understand how their commitment to respecting and promoting Human Rights should be implemented. The Virtual Course on Human Rights and Business, the Ethics Course, as well as other documents, policies, case of studies, and other resources, are available on Ecopetrol's technological platforms'. However, although the Company indicates it trains workers and that it has human rights related material available, it is not clear that all workers are communicated about the human rights policy commitments. The Company has provided an additional source to this subindicator, which seems to be a supply chain hub in Spanish. [2022 Integrated Management Report, 2023: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [Human Rights website, 28/03/2022: <a href="ecopetrol.com.co">ecopetrol.com.co</a>] <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Communicates HRs policies to stakeholders: The 2022 Integrated Management Report notes: 'Ecopetrol conducts annual training on Human Rights for its Stakeholder Groups, including government bodies, personnel, suppliers, and partners. [...] The following achievements can be highlighted [...] A total of 1,127 people connected to the human rights streaming sessions [...] Human Rights training was provided to approximately 1,200 workers, more than 900 suppliers, around 2,500 physical security contractors, and 10 partners'. Also, 'The Diversity, Equity, and Inclusion (DEI) Program, launched since the beginning of 2019, develops a holistic approach to integrate DEI into the TSEG pillar and the processes. It is targeted at all Stakeholder Groups, with a focus on employees, the community, and suppliers. The program is made up of five (5) cornerstones, as follows: Gender; Disability; Reconciliation (victims of armed conflict, veterans, and ex-combatants); Ethnic groups, origin, and sociocultural conditions; Sexual orientation and non-binary gender identity'. However, it is not clear how it communicates its policy commitments, in general, to affected stakeholders. It must include local communities. The Company has provided an additional source to this subindicator, which seems to be a supply chain hub in Spanish. No further evidence found. [2022 Integrated Management Report, 2023: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [Portal Ecopetrol (In Spanish), N/A: <a href="ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Not Met: Example of how HRs policies are accessible for intended audience: See above the information about the different courses that Company provides as well as the supply chain hub [in Spanish]. However, the subindicator looks for an example how the Company ensures the form and frequency of the information communicated [its policy commitments] is accessible to its intended audience, including local communities. [2022 Integrated Management Report, 2023: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [Portal Ecopetrol (In Spanish), N/A: <a href="ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul> </li></ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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: Meets ILO requirement for suppliers on A.1.2.a</li> <li>• Met: Describes steps to communicate HRs policies to EX BPs: The Guide on Human Rights and Business indicates: 'Ecopetrol promotes these issues among their suppliers and other stakeholders. This ensures advancing human rights respect throughout their operations, their supply chains, and other business relationships. To this end, Ecopetrol facilitates access to information through face-to-face and virtual spaces and, when deemed necessary, relies on external experts</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>or State agencies with expertise in the field. This policy must be disseminated periodically to Ecopetrol employees and other stakeholders, in the spaces established for this purpose'. The 2022 Integrated Management Report notes: 'There are guidelines for pre-contractual enlistment in the supply chain to ensure the suitability of the suppliers prior to being hired, and there are also contractual clauses on Human Rights and contractor performance evaluation mechanisms that include criteria associated with Human Rights'. It adds: 'the Company sets the labor standards to be met by all suppliers with their workers when conducting activities for Ecopetrol, by means of its internal labor regulations applicable to the contracted activities. This policy evinces the Company's commitment to respect all human rights, with special emphasis on the supply chain'. [2022 Integrated Management Report, 2023: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [Guide on Human Rights and Business, 06/04/2022: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes how HRs policies are contractual/binding for suppliers: The 2021 Integrated Sustainable Management Report states that 'Within the various contractual clauses, Ecopetrol contemplates mechanisms to control and measure performance in all activities under the contract, including Human Rights'. The 2022 Integrated Management Report notes: 'There are guidelines for pre-contractual enlistment in the supply chain to ensure the suitability of the suppliers prior to being hired, and there are also contractual clauses on Human Rights and contractor performance evaluation mechanisms that include criteria associated with Human Rights'. [Integrated Sustainable Management Report 2021, 2021: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [2022 Integrated Management Report, 2023: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Not Met: Requires EX BPs to cascade contractual/binding HRs policies to their BPs: The 2022 Integrated Management Report notes: 'There are guidelines for pre-contractual enlistment in the supply chain to ensure the suitability of the suppliers prior to being hired, and there are also contractual clauses on Human Rights and contractor performance evaluation mechanisms that include criteria associated with Human Rights'. It adds: 'the Company sets the labor standards to be met by all suppliers with their workers when conducting activities for Ecopetrol, by means of its internal labor regulations applicable to the contracted activities. This policy evinces the Company's commitment to respect all human rights, with special emphasis on the supply chain'. The Guide on Human Rights and Business indicates: 'Ecopetrol promotes the implementation of its commitment by its partners and other actors with whom it has contractual or commercial relations, especially in the framework of the activities that are carried out jointly'. However, this subindicator looks for evidence that the Company requires business partners to cascade the contractual or other binding requirements down their supply chain. No further evidence found. [Integrated Sustainable Management Report 2021, 2021: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [Guide on Human Rights and Business, 06/04/2022: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul>
B.1.5	Training on Human Rights	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: Score of at least 1 on A.1.2.a</li> <li>• Met: Describes how workers are trained on HRs policy commitments: The Guide on Human Rights and Business indicates: 'Ecopetrol also raises awareness and provides training in human rights to the members of Ecopetrol S.A. Steering Committee and the members of the governing bodies that represent them in other companies, as well as to all workers'. The 2022 Integrated Management Report notes: 'Ecopetrol conducts annual training on Human Rights for its Stakeholder Groups, including government bodies, personnel, suppliers, and partners. They address internal policies and the commitment to respect human rights at Ecopetrol, as well as issues related to the UNGPs, the ILO Tripartite Declaration, and other labor issues, including decent work and the prevention of forced labor. Training is ensured through the following means: virtual human rights course, virtual and in-person training with internal or external experts, human rights talks via streaming, sending information with key messages on the subject, and conducting focus groups to assess human rights risks, among others'. Also: 'Number of employees receiving training' in 2022: 2,107. [Guide on Human Rights and Business, 06/04/2022: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [2022 Integrated Management Report, 2023: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Met: Trains relevant managers including security on HRs: The Company states that 'Ecopetrol establishes training requirements for all direct workers and organizations providing security staff'. It shows a chart of security personnel who received formal training in specific HR policies. In addition, there is 'specific 'Human Rights training for the Law Enforcement Agencies'. The Company provided</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>feedback to CHRB regarding this indicator, however, key evidence was already in use. [Integrated Sustainable Management Report 2021, 2021: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [Due Diligence in Human Rights_web, 30/04/2020: <a href="ecopetrol.com.co">ecopetrol.com.co</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Met: Meets both requirements under score 1</li> <li>• Met: Trains BPs to meet HRs commitments: The Company states that 'The HHRR guidelines are mandatory for all Company workers, senior executives, and suppliers in the development of their activities.' Besides that, 'Ecopetrol annually conducts trainings on Human Rights for its suppliers, addressing issues related to the ILO Tripartite Declaration and other labor issues, including decent work and the prevention of forced labor.' The Company provided feedback to CHRB regarding this indicator, however, key evidence was already in use. [Integrated Sustainable Management Report 2021, 2021: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Not Met: Discloses % suppliers trained: The 2022 Integrated Management Report notes: 'Human Rights training was provided to [...] more than 900 suppliers [...] Human rights issues were included on the agenda of Regional Supplier Summits (Cartagena and Orinoquía), with the participation of more than 350 companies'. However, it is not clear the percentage extractive business partners that these figures represent. [2022 Integrated Management Report, 2023: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul>
B.1.6	Monitoring and corrective actions	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>• Met: Score of at least 1 on A.1.2.a</li> <li>• Not Met: Monitors implementation of HRs policy commitments across global ops and EX BPs: The Guide on Human Rights and Business indicates: 'The annual HHRR plan is the tool that ensures the adequate application of the human rights Guideline. The preparation, monitoring, and assessment of this plan for Ecopetrol S.A. are led by Corporate Responsibility, in collaboration with other areas of the organization. It is also part of the Corporate Responsibility System management tools. In the other Group companies, the definition of the plan will be led by the area equivalent area to Corporate Responsibility. The preparation of this plan considers the results of the analysis of the perceptions and expectations of the stakeholders, risks analysis, self-diagnoses, reports related to operational HHRR risks, performance assessments of contractors, external standards and measurements, including assessment results (DJSI6, CHRB7, inter alia), consolidated reports on pleas, complaints and claims, legal actions, and complaints related to HHRR issues. Regulatory changes, public policies, and the development of good practices, inter alia, are also considered'. The 2022 Integrated Management Report notes: 'Ecopetrol's human rights management is framed within six (6) principles under the Human Rights Guide: Due diligence, Cross-cutting nature, Complementarity, Collaborative work, Differential approach, Monitoring and evaluation. Every year, Ecopetrol produces its Human Rights Action Plan, a tool that ensures the proper adoption of due diligence and Human Rights guidelines. Based on the PDCA cycle, the actions to be deployed are established to ensure management in accordance with relevant standards'. However, it is not clear it involves monitoring across its extractive business partners. [Guide on Human Rights and Business, 06/04/2022: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [2022 Integrated Management Report, 2023: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Not Met: Discloses % of EX BP's monitored: The 2022 Integrated Management Report discloses the percentage of total operating sites where human rights risks have been assessed in 2022 of Contractors and Tier 1 Suppliers [100%] and Joint Ventures [100%]. However, this indicator looks for the percentage of business partners that had their compliance monitored. Human rights risk assessment is assessed in B.2. [2022 Integrated Management Report, 2023: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Not Met: Describes how workers are involved in monitoring: The Guide on Human Rights and Business indicates: 'The annual HHRR plan is the tool that ensures the adequate application of the human rights Guideline. [...] The preparation of this plan considers the results of the analysis of the perceptions and expectations of the stakeholders'. However, this subindicator looks for a description of how the Company's workers are involved in carrying out the monitoring process itself. [Guide on Human Rights and Business, 06/04/2022: <a href="files.ecopetrol.com.co">files.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.a</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Describes corrective actions process: The 2022 Integrated Management Report notes: ‘Prevention and mitigation actions are taken in Ecopetrol’s operations in order to prevent or mitigate negative impacts on rightsholders’. The Company discloses various prevention or mitigation measures adopted for different Human Rights issues. However, no further description of the corrective action process regarding the whole group was found. This indicator looks for the standard process it has in place to implement corrective action plans where non-compliances are found as part of the monitoring process. Mitigation and prevention measures are assessed in B.2.3. [2022 Integrated Management Report, 2023: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Not Met: Discloses findings and number of correction action processes: As indicated above, the Company discloses various prevention or mitigation measures adopted for different Human Rights issues as well as the explanation of its human rights Risk Management Cycle Guide. However, no further evidence found on the findings of its human rights monitoring process and number of corrective action processes as a result of the monitoring. [2022 Integrated Management Report, 2023: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul>
B.1.7	Engaging and terminating business relationships	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: HRs performance affects selection EX BPs: The 2022 Integrated Management Report notes: ‘Ecopetrol’s supply chain process defines any event or action with negative impacts on economic growth and social well-being as being of high risk for TEGS [Technology, Environment, Social, and Governance]. For this reason, the Company monitors and evaluates critical environmental, social, and economic aspects to ensure harmony in its operations and reduce TEGS risks. Ecopetrol has designed a methodology and different criteria to conduct its supplier performance evaluation to ensure the proper execution of contracts and objectively establish long-term commercial relationships. [...] There are guidelines for pre-contractual enlistment in the supply chain to ensure the suitability of the suppliers prior to being hired, and there are also contractual clauses on Human Rights and contractor performance evaluation mechanisms that include criteria associated with Human Rights’. However, although it indicates there are guidelines for pre-contractual enlistment, no further description found on how human rights is taken into account prior to entering into commercial relationships. [2022 Integrated Management Report, 2023: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Not Met: HRs performance affects ongoing BPs relationships: The Guide for Labor Aspects and Conditions in Activities Contracted by Ecopetrol notes: ‘Once non-compliance by the contractor with the provisions contained in this document is verified, the contract follow-up official will implement the sanctioning instruments agreed in the contract, which will also affect the performance evaluation as appropriate’. The Guide contains provisions on human rights and labour standards. The 2022 Integrated Management Report adds: ‘there are also contractual clauses on Human Rights and contractor performance evaluation mechanisms that include criteria associated with Human Rights’. However, although the Company indicates that Company’s will be sanctioned accordingly for not complying with the Guide and that there are contractual clauses on Human Rights as well as performance evaluation of it, it is not clear how human rights performance is taken into account in the decisions to renew, expand or terminate business relationships, including business partners. [2022 Integrated Management Report, 2023: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [Guide for labor aspects in activities contracted by Ecopetrol, 26/01/2022: <a href="https://saauecprdrpecp.blob.core.windows.net">saauecprdrpecp.blob.core.windows.net</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes positive HRs incentives for business relationships</li> <li>• Met: Works with EX BPs to meet HRs requirements: The Company states that ‘In 2022, the Vice Presidency of Subsidiaries and Assets with Partners developed a strategy together with the cross-cutting areas to manage partner relationships, including the following initiatives: [...] Human rights: Training was provided and efforts were undertaken to disseminate messages related to this subject’. Also, ‘Ecopetrol conducts annual training on Human Rights for its Stakeholder Groups, including government bodies, personnel, suppliers, and partners. [...] Human Rights training was provided to [...] more than 900 suppliers, around 2,500 physical security contractors, and 10 partners. Emphasizing Human Rights due diligence, respect for social leaders, and the commitment to respect Human Rights in the Company. Communication pieces about human rights were sent to 100% of the partners. [...] Human rights issues were included on the agenda of Regional Supplier Summits (Cartagena and Orinoquia), with the participation of more than 350 companies’. [2022 Integrated Management Report, 2023: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.8	Approach to engagement with affected stakeholders	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: Discloses stakeholders whose HRs may be affected: The 2022 Integrated Management Report notes: 'Ecopetrol has identified seven (7) Stakeholder Groups, as listed below: [...] Customers; Employees, pensioners, and their beneficiaries; Shareholders and investors; Associates and partners; State; Suppliers, contractors, and their workers; Society and community. [...] Stakeholder Groups' perception and expectations survey: in 2022, the Company conducted this survey with a total of 91,534 people and organizations according to the databases and the information provided by the vice-presidencies that lead engagement processes. The survey determined the perception of the seven (7) Stakeholder Groups regarding the fulfilment of Ecopetrol's value pledge to each of them. The Company states that its human rights 'risk management cycle must be applied in the systems, processes, or activities in which there is a propensity to impact stakeholder groups negatively or positively, especially the community, and society, as well as employees, retirees and their beneficiaries, and contractor and vendor employees who are Human Rights holders.' [Human Rights Risk Management Cycle Guide, 26/01/2022: <a href="http://saauecprdrpecp.blob.core.windows.net">saauecprdrpecp.blob.core.windows.net</a>]</li> <li>• Not Met: Provides two examples of engagement with stakeholders: The 2021 Integrated Sustainable Management Report notes that among its seven stakeholder groups are 'Society and Community' for which it has identified 'Prioritized Social Elements: 1. Local development 2. Access to information and citizen participation 3. Public policy'. Another stakeholder group are 'Suppliers, Contractors, and their Workers'. For this group, it lists the same priority social elements. Regarding the (ECP011) Compliance with Conventional Human Rights Commitments, the 2022 Integrated Management Report notes: 'The 2018-2022 Collective Bargaining Agreement incorporates Chapter XVII on "Human Rights and Peace," by virtue of which Ecopetrol and the Oil Industry Workers' Union - USO join efforts to foster respect, compliance, and disclosure of Human Rights in the Company and in the regions where it operates'. Also, as for the Stakeholder Groups' perception and expectations survey, it notes: 'in 2022, the Company conducted this survey with a total of 91,534 people and organizations according to the databases and the information provided by the vice-presidencies that lead engagement processes. The survey determined the perception of the seven (7) Stakeholder Groups regarding the fulfilment of Ecopetrol's value pledge to each of them, as well as the prioritization assigned by each of them to the material issues under the Generating Value with TSEG pillar of the 2040 Strategy'. The Company has provided comments to CHRB regarding this indicator pointing out its Commitment to Human Rights Defenders. However, although the Company has engaged with a union to draw a human rights related agreement recently, the Company is expected to provide at least two examples of its engagement with stakeholders whose human rights have been or may be affected by its activities (or their legitimate representatives or multi-stakeholder initiatives) in the last two years. [Integrated Sustainable Management Report 2021, 2021: <a href="http://files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [2022 Integrated Management Report, 2023: <a href="http://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Analysis of stakeholder views on company's HRs issues: The 2022 Integrated Management Report notes: 'Ecopetrol conducts this survey annually for all Stakeholder Groups to evaluate the Company as a corporate citizen, as well as to find out their assessments and expectations regarding the Company's management efforts towards the Generating Value with TSEG pillar under its 2040 Strategy, represented by the material elements and other corporate responsibility matters. The results of the survey are presented to the Board of Directors' Corporate Governance and Sustainability Committee, and they also serve as an important input for the annual construction of engagement plans for each Group, as well as to conduct the materiality analysis that defines the structure and content of this report'. However, the Company is expected to provide a summary analysis of the input/views given by stakeholders [whose human rights have been or may be affected by its activities] on human rights issues during engagements. The Report also discloses the prioritization of Ecopetrol's material elements. However, the Company is expected to provide inputs from affected stakeholders, and the materiality assessment gathers the views of the Company's stakeholders in general. [2022 Integrated Management Report, 2023: <a href="http://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Not Met: Describes how stakeholders views influenced company's HRs approach: The Guide on Human Rights and Business indicates: 'The implementation of these guidelines is part of the Corporate Responsibility System (SRC, from its name in Spanish) that guides Ecopetrol's behavior as a corporate citizen, considering the</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			changing expectations of stakeholders. [...] Ecopetrol ensures to consider the perceptions and expectations of its stakeholders, especially those who may be more vulnerable. [...] The preparation of this plan considers the results of the analysis of the perceptions and expectations of the stakeholders'. However, this subindicator looks for specific actions that followed affected stakeholder views on particular topics. Current evidence seems to refer to general feedback influencing general approach. [Guide on Human Rights and Business, 06/04/2022: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a> ]

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	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: Describes process of identifying risks in own operations: The Company states that 'The identification of HHRR risks must be conducted periodically regardless of the phase of the projects or activities and, in any case, at least once a year. The identification of risks must take place based on the best information available internally and externally that accounts for circumstances in which human rights of their holders may be negatively impacted, due to business activities or other commercial relationships.' The Company further describes the information required for this process, which includes information of the area/operation, such as demographics, pre-existing conflicts, social and economic context. Additional information to be gathered includes 'Process characterization' (inputs, outputs, etc) and 'Identification of the relevant stakeholders (communities in the area, social organizations, international organizations in the area, entity representatives, etc.),' including vulnerable groups. Finally, the Company notes that information from previous activities such as audits or surveys should also be considered. The Company also provides information on how to identify such information, namely through speaking to different local departments, conducting 'Focus groups and interviews ...with relevant identified stakeholders, to understand their human rights perceptions, complaints, and concerns' as well as undertaking 'consultations with experts and external sources.' The Company provided additional feedback to CHRB regarding this indicator, however, key evidence was already in use. [Human Rights Risk Management Cycle Guide, 26/01/2022: <a href="saauecprdrpecp.blob.core.windows.net">saauecprdrpecp.blob.core.windows.net</a>] &amp; [Integrated Sustainable Management Report 2021, 2021: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>Met: Describes process for identifying risks in EX BPs: In relation to the scope of its human rights due diligence process, the Company states that 'HHRR risks that may be generated by direct operations must be identified, evaluated, and mitigated, as well as those operations developed with partners or through contractor partners.' For the risk identification process described under A, it notes that 'The identification of risks must take place based on the best information available internally and externally that accounts for circumstances in which human rights of their holders may be negatively impacted, due to business activities or other commercial relationships.' It further explains that the 'Percentage of total operating sites where human rights risks have been assessed' is 100% for its 'Tier 1 Contractors and Suppliers' and its joint ventures. The Company provided additional feedback to CHRB regarding this indicator, however, key evidence was already in use. [Human Rights Risk Management Cycle Guide, 26/01/2022: <a href="saauecprdrpecp.blob.core.windows.net">saauecprdrpecp.blob.core.windows.net</a>] &amp; [Integrated Sustainable Management Report 2021, 2021: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Describes global risk identification system incl. stakeholder consultation: In its Human Rights Risk Management Cycle Guide, the Company states that 'risk identification shall be conducted at least once a year.' The Company describes that its risk assessment 'as a starting point' should include the 'Identification of the relevant stakeholders (communities in the area, social organizations, international organizations in the area, entity representatives, etc.).' As a next step, it notes that 'Focus groups and interviews should similarly be conducted with relevant identified stakeholders, to understand their human rights perceptions, complaints, and concerns, directly or indirectly related to the presence of business activities in the area. The list of risk types identified regarding human rights issues, as well as consultations with experts and external sources, are also useful for this exercise.' [Human Rights Risk Management Cycle Guide, 26/01/2022: <a href="saauecprdrpecp.blob.core.windows.net">saauecprdrpecp.blob.core.windows.net</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Describes how risk identification system is triggered by new circumstances: The 2022 Integrated Management Report notes: 'Given that some of Ecopetrol's areas of operation are affected by conflicts, thus increasing the risk of the Company, its suppliers, partners, and other related stakeholders of being involved in human rights abuses, Ecopetrol will therefore intensify its due diligence enforcement actions and will promote them along its value chain'. However, no description of how the human rights risk and impact identification is triggered by new conflict affecting particular locations. The Human Rights Risk Management Cycle Guide adds: 'The identification of HHRR risks must be conducted periodically regardless of the phase of the projects or activities and, in any case, at least once a year. The identification of risks must take place based on the best information available internally and externally that accounts for circumstances in which human rights of their holders may be negatively impacted, due to business activities or other commercial relationships'. It adds: 'As a starting point, in relation to the external information, the following relevant information should be available: Characterization of the area and operation (if applicable to the analysis) [...] ii. Historical (human rights, armed conflict), social, and economic context (e.g., level of unsatisfied basic needs, presence of previous activities in the area) [...]'. However, although information on conflict should be available at the beginning to the process, no description found of how the process is triggered by new country operations, new business relationships, new human rights challenges or conflict affecting particular locations. [2022 Integrated Management Report, 2023: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [Human Rights Risk Management Cycle Guide, 26/01/2022: <a href="saaeuecprdpcep.blob.core.windows.net">saaeuecprdpcep.blob.core.windows.net</a>]</li> <li>• Not Met: Describes risks identified in relation to new circumstances: The 2022 Integrated Management Report notes: 'As part of its due diligence efforts, Ecopetrol identified and evaluated possible impacts and risks associated with respect for Human Rights in its own activities, and also in the supply chain and other commercial relationships'. It then discloses the risks. Also: 'Prevention and mitigation actions are taken in Ecopetrol's operations in order to prevent or mitigate negative impacts on rightsholders'. The Company discloses the prevention or mitigation measures adopted for the Human Rights that receive special consideration. In addition, 'Given that some of Ecopetrol's areas of operation are affected by conflicts, thus increasing the risk of the Company, its suppliers, partners, and other related stakeholders of being involved in human rights abuses, Ecopetrol will therefore intensify its due diligence enforcement actions and will promote them along its value chain'. However, it is not clear the risks were identified specifically in relation to new country operations, new business relationships, new human rights challenges or conflict affecting particular locations. [2022 Integrated Management Report, 2023: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul>
B.2.2	Assessing human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes assessment process and discloses salient HRs risks: The Human Rights Risk Management Cycle Guide discloses how it evaluates the risks it identified, namely that it assesses the severity, scale, scope, and irremediable nature of each risk. It provides a table with detailed assessment criteria, that specify how to assess subareas of the aforementioned criteria on a scale between 1-3. An example under 'scale' includes 'Effects on the rights of vulnerable populations' with 1 equalling 'No effects on the rights of vulnerable populations (women, children, indigenous and afro descendant populations, etc.) have been identified', two equalling 'There are real and potential effects on the rights of vulnerable populations (women, children, indigenous and afro-descendant populations, etc.)' and three equalling 'There are real and potentially serious and irremediable effects on the rights of vulnerable populations (women, children, indigenous and afro-descendant populations, etc.)'. It further depicts a severity, a probability, and a risk assessment scale. It adds: 'As a starting point, in relation to the external information, the following relevant information should be available: Characterization of the area and operation (if applicable to the analysis) i. Relevant demographic data (number of inhabitants, age, and gender distribution, among other aspects) ii. Historical (human rights, armed conflict), social, and economic context (e.g., level of unsatisfied basic needs, presence of previous activities in the area). [...] Some useful criteria to determine the scale of the effect are the degree of impact and the type of rights that could be involved. This refers to the level of involvement of the company in the generation of a risk and the vulnerability of the individuals or groups affected due to particular conditions, such as their age, social condition, or being recognized as vulnerable groups by the legal system'. The webpage section due diligence adds: 'As a result of the risk and impact assessment exercises that have been carried out periodically within the organization, a series of</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>areas have been identified in which certain human rights may be negatively impacted, due to the nature of our activities or commercial activities'. In the 2022 Integrated Management Report, the Company discloses the 'Human Rights that receive special consideration' into four different blocks: Block of rights: Life and Personal Safety; Block of rights: Dignified life and adequate standard of living; Block of rights: Decent working conditions; Block of rights: society and local communities. Each block constrains a series of risk [and respective mitigation measures], including: 'Right to life; Right to personal integrity; Right to free movement; Right to personal liberty; Right to decent conditions and the nonsexual exploitation of minors; Right to decent work and rejection of forced, compulsory, and child labor, among other risks. [Human Rights Risk Management Cycle Guide, 26/01/2022: <a href="http://saauecprdrpecp.blob.core.windows.net">saauecprdrpecp.blob.core.windows.net</a>] &amp; [Due Diligence in Human Rights_web, 30/04/2020: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how process applies to EX BPs: Regarding the planning phase, the Human Rights Risk Management Cycle Guide notes: 'All activities conducted by Ecopetrol are subject to HHRR risk analysis, insofar as HHRR risks can arise in any of the life cycle phases of a project or operation; they can derive from the execution of any of the company's cross-cutting processes (e.g., human talent, environmental licensing) or systems; and they can arise from the commercial activities conducted both with partners, clients, and in the supply chain, provided that they may affect rights holders. In this sense, it is necessary to consider the following aspects: [...] Scope - HHRR risks that may be generated by direct operations must be identified, evaluated, and mitigated, as well as those operations developed with partners or through contractor partners'. However, although all activities are included in the planning phase, and while the risk identification process of the Company seems to focus on supply chains also (see B.2.1), in its risk assessment focus, the Company appears to focus on its own operations only. Specifically, in relation to its assessment of 'Level of involvement of the company' the Company lists three different options, all of which focus on its own operations only. It provides further information on the treatment of these risks, in specific on the prioritization of treatment, which also takes into consideration actions taken together with partners, however no further evidence found on the process it has in place to assess its human rights risks at its business partners. [Human Rights Risk Management Cycle Guide, 26/01/2022: <a href="http://saauecprdrpecp.blob.core.windows.net">saauecprdrpecp.blob.core.windows.net</a>]</li> <li>• Met: Public disclosure of results of HRs risk assessment: The Company states that 'After the Human Rights risk analysis, no situations involving the risk of forced labor were identified in the operations or in the supply chain.' The Company also discloses the results of its assessments considering each local operation, determining the impacts and management measures for each one. For example: In Piedemonte, Colombia, the identified impacts were: Generation and/or alteration of social conflicts; Modification of the economic activities in the area; Changes in the labor dynamics of the communities and guilds given. The Company provided additional feedback to CHRB regarding this indicator, however, key evidence was already in use. [Integrated Sustainable Management Report 2021, 2021: <a href="http://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1: See above.</li> <li>• Not Met: Describes how assessment involved affected stakeholders: The Guide on Human Rights and Business indicates: 'In developing this [HHRR evaluation] cycle, Ecopetrol ensures to consider the perceptions and expectations of its stakeholders, especially those who may be more vulnerable'. However, this piece of evidence makes reference to Ecopetrol S.A., it is not clear the Company has similar policy company-wide. Regarding the Communication stage of the human rights risk management, the Human Rights Risk Management Cycle Guide notes: 'This phase consists in exchanging information with stakeholder parties to understand the risk, as well as to obtain information and feedback for the supervision thereof and for decision-making purposes, considering different standpoints. The UNGP suggest that human rights due diligence processes involve significant participation of potentially affected groups and other stakeholder parties, in order to understand the concerns of the people whose rights may be potentially impacted by the activities of the company. Given that these risks are associated with a potential impact on human rights, it is important, at this stage, that the parties subject to this risk management cycle consult with internal sources that may account for the potential impacts on the human rights of Ecopetrol stakeholder groups (workers, contractor workers, communities), as part of their own activities or other commercial relationships with partners or vendors'. It clarifies: 'Among the sources that may be consulted are the Citizen Participation Office, Corporate Responsibility, and the context, environmental, and legal teams'.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>The 2022 Integrated Management Report notes: 'By monitoring 17 grouped issues, Ecopetrol analyzes the behavior of 80% of all complaints received, allowing the Company and its decision makers to be alerted about the behavior of issues that entail business or process risks; once the trends and risk issues have been identified, an alert is sent to the Citizen Participation Office, which then conducts a root cause analysis and establishes improvement or mitigation plans to reduce said dissatisfactions to zero'. However, this subindicator looks for a description of how it involves affected stakeholders in the assessment processes of due diligence. No further evidence found. [Guide on Human Rights and Business, 06/04/2022: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [Human Rights Risk Management Cycle Guide, 26/01/2022: <a href="https://saauecprdpcep.blob.core.windows.net">saauecprdpcep.blob.core.windows.net</a>]</p>
B.2.3	Integrating and acting on human rights risks and impact assessments	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: Describes system to prevent, mitigate and remediate HRs issues: The Company states that 'In accordance to the Integrated Risk Management Guide, this phase aims to establish and implement applicable actions according to the identified risk. In this sense, the expectations are: To formulate, plan, and execute risk treatment measures; To evaluate the effectiveness of the treatment measures; To decide if the residual risk is acceptable; To execute additional treatment if the residual risk is not acceptable. For HHRR risks, one or more prevention or mitigation actions may be taken. In this sense, the expectations are: (i) to entirely avoid the risk by removing the potential source of the impact; (ii) to mitigate the risk, should it occur, by reducing the severity of the impact, or (iii) to mitigate the risk by reducing the probability of the impact.' [Human Rights Risk Management Cycle Guide, 26/01/2022: <a href="https://saauecprdpcep.blob.core.windows.net">saauecprdpcep.blob.core.windows.net</a>]</li> <li>• Met: Describes how global system applies to EX BPs: Regarding the treatment and prioritization of it, the Human Rights Risk Management Cycle Guide notes: 'Given that there may be multiple HHRR risks identified in the previous step, they need to be prioritized to ensure the treatment thereof. In this sense, the expectation is to identify the prioritized HHRR risks based on the results of their severity and probability evaluation. Thus, priority treatment must be given to the risks that are more severe and those whose delayed treatment may result in irremediable effects or consequences. [...] Some of the actions to be taken by the company can be integrated to actions defined in the environmental or social management plans; can be incorporated in corrective action plans; or can correspond to HHRR training actions to help address the identified risks. Other actions can be taken together with third parties such as the State, local authorities, suppliers, partners, civil society organizations, among others. Once the treatment has been defined, the residual risks must be determined, considering the effects of the corresponding treatment actions. If the residual risk level is not within acceptance levels, the treatment stage can be conducted again before accepting the risk. To ensure the implementation of the treatment actions, they must be integrated in the business conduct, and must be understood by the parties involved, with a follow-up thereon by the responsible team or officer and the GRT, when applicable'. [Human Rights Risk Management Cycle Guide, 26/01/2022: <a href="https://saauecprdpcep.blob.core.windows.net">saauecprdpcep.blob.core.windows.net</a>]</li> <li>• Met: Example of actions decided on at least 1 salient HRs issue: The Company states that 'The Management focused its efforts on the implementation of risk prevention plans in Security and Human Rights. This analysis includes all the people who work in physical security in the regions where the company is present. The regional approach allows a differentiated analysis of the territorial context, dynamics of violence and identifying subjects at risk and targeting relevant actions. The analysis begins with two workshops with GSF security leaders, officials and contractors, to determine basic concepts regarding risks, voluntary security principles, obligations of companies in respect of human rights, due diligence, early prevention, urgent prevention and lessons learned'. [Human Rights Risk Management Cycle Guide, 26/01/2022: <a href="https://saauecprdpcep.blob.core.windows.net">saauecprdpcep.blob.core.windows.net</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Meets all requirements under score 1: See above.</li> <li>• Not Met: Describes how stakeholders involved in decisions about actions taken: As indicated above, in the prioritization phase, the Company indicates: 'Other actions can be taken together with third parties such as the State, local authorities, suppliers, partners, civil society organizations, among others'. However, it is not clear how it involves affected stakeholders in decisions about the actions to take in response to its salient human rights issues. [Human Rights Risk Management Cycle Guide, 26/01/2022: <a href="https://saauecprdpcep.blob.core.windows.net">saauecprdpcep.blob.core.windows.net</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	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: Describes system for evaluation effectiveness of actions: The Company states that 'The purpose of this stage is to conduct periodic monitoring of the treatment measures established in the previous stage. This monitoring must be conducted by the responsible areas at least twice a year and, depending on the severity of the risk, the responsible area must determine whether more constant monitoring is required. At this stage, the results of the adopted measures must be recorded to determine whether it is necessary to update the risk (there assessment thereof), maintain the adopted measures, or adopt new ones.' [Human Rights Risk Management Cycle Guide, 26/01/2022: <a href="saauecprdpcep.blob.core.windows.net">saauecprdpcep.blob.core.windows.net</a>]</li> <li>• Not Met: Example of lessons learned from evaluation effectiveness of actions: The Company indicates that 'By managing the material element of Local Development and the dynamics and results of its strategic options, adjustments were incorporated into the policy documents based on the results and lessons learned. In 2022, the new version of Ecopetrol's Procedure for the Management of Social Investment and Engagement Projects - GDE-P001 entered into force, as well as the Guide for the Construction of Ecopetrol's Sustainable Development Portfolio of Strategic and Mandatory Investments, which are regulatory documents that have a direct relationship with the management of Local Development'. However, no example was found of the lessons learned while tracking the effectiveness of its actions on at least one of its salient human rights issues as a result of its due diligence process. [2022 Integrated Management Report, 2023: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1: See above.</li> <li>• Not Met: Involves stakeholders in evaluation effectiveness of actions</li> </ul>
B.2.5	Communicating on human rights 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: Provides two examples of comms with stakeholders: The Company conducts an annual Stakeholder Perception and Expectation survey with the objective of learning about the assessments and expectations of the stakeholders regarding the Company's management. It states that the results of the surveys are used in the Human Rights Plan preparation. The 2022 Integrated Management Report indicates that 'The U'wa Reflection Center is an effort between Ecopetrol, Asou'wa, and the Governorship of Boyacá. The purpose is to secure a space where the community can hold activities to strengthen its own governance and cultural practices. The agreement for the construction of the center was signed in 2022 and a protocolary act was held to place the first stone for the start of the construction'. Also, 'The dialogue and consensus with the Alto Unuma Meta Reserve of the Sikvani ethnic group, adjacent to the Rubiales field, allowed its members and Ecopetrol to not just become neighbors but also friends. The foregoing was a process based on trust, respect for cultural differences, and indigenous self-governance. Two (2) large meetings were held in 2022 between Company executives and authorities of the Unuma Reserve, one in their territory and the other in the Bogotá offices'. However, although the Company provides examples of engagement with different stakeholders, this indicator looks for two examples demonstrating how it communicates with affected stakeholders regarding specific human rights impacts raised by them or on their behalf. It focuses on how the Companies ensure meaningful information reaches affected stakeholders, how it responds, in communication terms, to issues raised by stakeholders and about their access to those communications. [Integrated Sustainable Management Report 2021, 2021: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [Human Rights Risk Management Cycle Guide, 26/01/2022: <a href="saauecprdpcep.blob.core.windows.net">saauecprdpcep.blob.core.windows.net</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes challenges to effective comms and how it is working to address them: The 2022 Integrated Management Report notes: 'Since 2018, an engagement plan began between Ecopetrol and Asou'wa (Association gathering the 17 communities of the United U'wa Reserve in Santander, Norte de Santander, and Boyacá) for the construction of a joint vision for the territory based on three (3) pillars: direct and permanent dialogue, mutual understanding, and the strengthening of trust. The plan has allowed communities to shift away from confrontation and resistance to being willing to establish dialogue, mutual understanding, and to exchange knowledge. Moreover, the engagement plan focuses on delving into environmental protection strategies and on determining how to avoid or mitigate the impacts arising from the deployment of extractive activities'. However, this subindicator looks for description of any challenge to effective communication it has identified and how it is working to address them in</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			the context of raising concerns in relation to impacts produced by the Company to specific affected stakeholders. [2022 Integrated Management Report, 2023: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a> ]

### C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for 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: Grievance mechanism accessible to all workers: The Company states that 'Ecopetrol has accessible internal and external channels so that all Stakeholders can express their disagreements, expectations, and needs to the Company. This is how Ecopetrol manages, analyzes, and provides a timely and quality response to their requests'. Then, it discloses different channels available where the stakeholders can express their concerns. [Due Diligence in Human Rights_web, 30/04/2020: <a href="https://files.ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Grievance mechanism available in appropriate languages and workers made aware: The 2022 Integrated Management Report notes: 'In order to ensure responsible business conduct, Ecopetrol establishes and provides Stakeholder Groups with the necessary mechanisms and spaces to communicate their expectations, disagreements, and needs, while ensuring a timely and thorough response to the petitions, complaints, claims, suggestions (PQRS), and compliments received. In the same way, participation sessions are organized for Stakeholder Groups to become informed about the activities conducted by the Company and to understand their perceptions, in order to build a close and trusting relationship with them'. Also, '[The Ethics Hotline] is a corporate channel operated by an independent international company, ensuring full transparency in the process and availability throughout the year, 24 hours a day, 7 days a week in Spanish, English, and Portuguese'. The Guide on Human Rights and Business indicates: 'Ecopetrol also raises awareness and provides training in human rights to the members of Ecopetrol S.A. Steering Committee and the members of the governing bodies that represent them in other companies, as well as to all workers'. The Guide contains information on the Hotline. [2022 Integrated Management Report, 2023: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [Guide on Human Rights and Business, 06/04/2022: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>Not Met: Describes how workers in EX BPs access grievance mechanism: The Company indicates that '- available to workers, contractors, suppliers, clients, allies, business partners, and other third parties'. The webpage section User Services indicates the Participation scenarios promoted by the Citizen Participation Office 'consists in promoting the development of opportunities intended for engagement with stakeholders, which enable attention, dialogue, accountability, and strengthening of citizen competences by creating synergies with the institutionality and the different mission and support areas of the company. These scenarios promote knowledge about the industry, the company, and its management. Themes relevant for relationships are communicated. Stakeholders needs and expectations are listened to. Operational outcomes and projections are disclosed, and citizen competencies are strengthened'. However, it is not clear if business partners' employees have access to file complaints in relation to suppliers' behaviour. It could be either by using the Company's own mechanism or the Company expects its suppliers to establish a mechanism for their workers to raise such complaints or concerns. [Integrated Sustainable Management Report 2021, 2021: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [User Services_web, N/A: <a href="https://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>Not Met: Expects EX BPs to convey expectation to their BPs</li> </ul>
C.2	Grievance mechanism(s) for 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 accessible to all external individuals and communities: The Company has several channels directed to each category of stakeholder. In addition, it has a website for complaints related to the Code of Ethics and Conduct which can be accessed by any worker or stakeholder. [Code of Ethics, 04/2018: <a href="https://google.com">google.com</a>] &amp; [Due Diligence in Human Rights_web, 30/04/2020: <a href="https://files.ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: The webpage section Due Diligence in Human Rights states that any stakeholder can use the channels available to communicate complaints and grievances, and they are directed to all locals where the Company has operations. The Company provides on its website many ways for all the stakeholders to direct their concerns, as e-mail, telephones, correspondence and</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>offices for personal attention. All these options are disclosed in the 'User Services' page of the Company's website. The 2022 Integrated Management Report notes: 'In order to ensure responsible business conduct, Ecopetrol establishes and provides Stakeholder Groups with the necessary mechanisms and spaces to communicate their expectations, disagreements, and needs, while ensuring a timely and thorough response to the petitions, complaints, claims, suggestions (PQRS), and compliments received. In the same way, participation sessions are organized for Stakeholder Groups to become informed about the activities conducted by the Company and to understand their perceptions, in order to build a close and trusting relationship with them'. Also, '[The Ethics Hotline] is a corporate channel operated by an independent international company, ensuring full transparency in the process and availability throughout the year, 24 hours a day, 7 days a week in Spanish, English, and Portuguese'. However, although there are participation sections with stakeholders, it is not clear how the Company ensures all affected external stakeholders at its own operations are made aware of it. [Due Diligence in Human Rights_web, 30/04/2020: <a href="https://ecopetrol.com.co">ecopetrol.com.co</a>] &amp; [2022 Integrated Management Report, 2023: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how external individuals/communities access grievance mechanism: The webpage section User Services indicates the Participation scenarios promoted by the Citizen Participation Office 'consists in promoting the development of opportunities intended for engagement with stakeholders, which enable attention, dialogue, accountability, and strengthening of citizen competencies by creating synergies with the institutionality and the different mission and support areas of the company. These scenarios promote knowledge about the industry, the company, and its management. Themes relevant for relationships are communicated. Stakeholders needs and expectations are listened to. Operational outcomes and projections are disclosed, and citizen competencies are strengthened'. However, it is not clear that external individuals and communities have access to the grievance channels, in order to raise Complaints or concerns about human rights issues at the Company's business partners (or to the Company's own mechanism to report in relation to business partners' behaviour). [User Services_web, N/A: <a href="https://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Not Met: Expects EX BPs to convey expectation to their BPs</li> </ul>
C.3	Users are involved in the design and performance of the mechanism(s)	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: Describes how users engaged on design and performance: The 2022 Integrated Management Report notes: 'To understand the users' perception of the [grievance] mechanism, surveys are conducted every month on the usefulness and operability thereof'. [2022 Integrated Management Report, 2023: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how users engaged on improvement of mechanism: The 2022 Integrated Management Report notes: 'The Citizen Participation Office monitors the relationships with its Stakeholder Groups. The purpose is to identify opportunities for process improvement using the PQRS [petitions, complaints, claims, and requests] received by the Company as a source of information, pinpointing expectations, non-conformities, process deviations, and alarms in the environment, and conducting a trend analysis of the PQRS and, in general, detecting situations that may affect the relationship by conducting monitoring reports, reporting PQRS sensitive to alarms, and using KRIs as a control limit methodology based on historical data. By monitoring 17 grouped issues, Ecopetrol analyzes the behavior of 80% of all complaints received, allowing the Company and its decision makers to be alerted about the behavior of issues that entail business or process risks; once the trends and risk issues have been identified, an alert is sent to the Citizen Participation Office, which then conducts a root cause analysis and establishes improvement or mitigation plans to reduce said dissatisfactions to zero'. However, this subindicator looks for a description of how it engages with potential or actual users (or individuals or organisations acting on their behalf) specifically on the improvement of the mechanism. Current evidence seems to study grievances received, rather than to proactively engage with users. [2022 Integrated Management Report, 2023: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Not Met: Provides user engagement examples (at least two) on improvement: The 2022 Integrated Management Report notes: 'By monitoring 17 grouped issues, Ecopetrol analyzes the behavior of 80% of all complaints received, allowing the Company and its decision makers to be alerted about the behavior of issues that entail business or process risks; once the trends and risk issues have been identified, an alert is sent to the Citizen Participation Office, which then conducts a root cause analysis and establishes improvement or mitigation plans to reduce said</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>dissatisfactions to zero’. However, this subindicator looks for at least two examples of engagement with potential or actual users on the improvement of the grievance mechanism [see above]. [2022 Integrated Management Report, 2023: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</p>
C.4	Procedures related to the mechanism(s) are equitable, 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: Describes procedure and timescales for managing complaints or concerns: The webpage section User Services explains the ‘Attention to citizens in the management of the right of petition (PQRS)’: It consists in ‘guaranteeing a timely and substantive response to all Petitions, Complaints, Claims and Suggestions - PQRS submitted to Ecopetrol. To this end, the procedure for managing Ecopetrol’s right of petition, the conditions, competences, and other substantial and instrumental management and control aspects have been established. This management is assessed with the indicator of timely assistance to citizens. To ensure timely attention to PQRS, there is a process and a network of approximately 220 solvers distributed in all areas of the company. This process is governed by the procedure for managing Ecopetrol’s right of petition, which sets out the general conditions, the competence respond, the stages of the process, and all other substantial and instrumental aspects that guarantee timely and adequate attention of citizen petitions. In the last 5 years, approximately 198,452 citizen requests have been addressed. The indicator of timely attention to citizens in this period averaged 99.97% and 99.94% in 2022’. The webpage section Due Diligence add: ‘In accordance with the type of petition filed, response times may vary from 10 to 30 business days. This term may be expanded up to twice the initial term’. It discloses a table which shows attention times under the law. However, no further description found on procedures for informing the complainant. [User Services_web, N/A: <a href="https://ecopetrol.com.co">ecopetrol.com.co</a>] &amp; [Due Diligence in Human Rights_web, 30/04/2020: <a href="https://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Not Met: Describes technical, financial, advisory support to enable equal access: The webpage section User Services explains the ‘Participation scenarios promoted by the Citizen Participation Office’: it consists in ‘promoting the development of opportunities intended for engagement with stakeholders, which enable attention, dialogue, accountability, and strengthening of citizen competences by creating synergies with the institutionality and the different mission and support areas of the company. These scenarios promote knowledge about the industry, the company, and its management. Themes relevant for relationships are communicated. Stakeholders needs and expectations are listened to. Operational outcomes and projections are disclosed, and citizen competencies are strengthened. To this end, the OPC structured the following portfolio: Pedagogy; Dialogue and accountability; Attention of stakeholders’. However, this subindicator looks for the technical, financial or advisory support available to complainants to enable equal access to and participation specifically in the grievance process [it could be for instance, training, access to a fund, etc]. [User Services_web, N/A: <a href="https://ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe types of outcome to complainant through use of mechanism: The 2022 Integrated Management Report indicates: ‘The Citizen Participation Office monitors the relationships with its Stakeholder Groups. The purpose is to identify opportunities for process improvement using the PQRS received by the Company as a source of information, pinpointing expectations, non-conformities, process deviations, and alarms in the environment, and conducting a trend analysis of the PQRS and, in general, detecting situations that may affect the relationship by conducting monitoring reports, reporting PQRS sensitive to alarms, and using KRIs as a control limit methodology based on historical data. By monitoring 17 grouped issues, Ecopetrol analyzes the behavior of 80% of all complaints received, allowing the Company and its decision makers to be alerted about the behavior of issues that entail business or process risks; once the trends and risk issues have been identified, an alert is sent to the Citizen Participation Office, which then conducts a root cause analysis and establishes improvement or mitigation plans to reduce said dissatisfactions to zero’. However, this subindicator looks for an explanation of the type of outcome to the complainant through use of the grievance mechanisms. [2022 Integrated Management Report, 2023: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Not Met: Describes escalation to senior levels / independent adjudicators: The Human Rights Risk Management Cycle Guide notes: ‘Given that there may be multiple HHRR risks identified in the previous step [evaluation in the context of addressing human rights risks], they need to be prioritized to ensure the treatment thereof. In this sense, the expectation is to identify the prioritized HHRR risks based on the results of their severity and probability evaluation. Thus, priority treatment</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>must be given to the risks that are more severe and those whose delayed treatment may result in irremediable effects or consequences. Accordingly, in the scenarios in which HHRR risks are valued at levels 3 or 4, prevention and mitigation measures must be issued by the people responsible for the project or activity, up to the level at which the risk is tolerable'. However, this subindicator looks for a description of how complaints or concerns [in the context of grievance mechanisms] for workers and all external individuals and communities may be escalated to more senior levels or independent third party adjudicators or mediators to challenge the process or outcome at the complainant's discretion. [Human Rights Risk Management Cycle Guide, 26/01/2022: <a href="http://saauecprdrpecp.blob.core.windows.net">saauecprdrpecp.blob.core.windows.net</a>]</p>
C.5	Prohibition of retaliation for raising complaints or concerns	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: Public statement prohibiting retaliation against workers/stakeholders: The Company states 'At Ecopetrol and its group, there is zero tolerance for retaliation against the persons who report acts contrary to the Code of Ethics and Conduct'. The 2022 Integrated Management Report adds: 'Ecopetrol and its Group admit zero tolerance for retaliatory actions against whistleblowers, as indicated in the Code of Ethics and Conduct, for which the Company ensures the following: [...] Retaliation is not allowed'. As indicated in C.2, external stakeholders are allowed to use grievance mechanisms. [Integrated Sustainable Management Report 2021, 2021: <a href="http://files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [2022 Integrated Management Report, 2023: <a href="http://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Met: Describes practical measures to prevent retaliation: The Company ensures 'anonymity, confidentiality of information and data protection.' The 2022 Integrated Management Report reaffirms it. [Integrated Sustainable Management Report 2021, 2021: <a href="http://files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [2022 Integrated Management Report, 2023: <a href="http://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Specifies no legal action, firing or violence: The Code of Ethics indicates that part of the responsibilities of the leaders include: 'To abstain from applying retaliation against those who file complaints for alleged violations of the Code'. As for reporting, it adds: 'Filing a complaint or participating in a verification process cannot be the basis for retaliation. [...] Ecopetrol will not allow any type of retaliation for having presented the complaint'. However, no further evidence found explicitly indicating that it will not retaliate against workers and stakeholders through the specific ways required by this subindicator. [Code of Ethics, 04/2018: <a href="http://google.com">google.com</a>]</li> <li>• Not Met: Expects EX BPs to prohibit retaliation against workers/stakeholders: See above. The Code of Ethics indicates 'This Code is intended for the members of the Board of Directors and employees of Ecopetrol S.A. and its Group, all individuals or legal entities that have any relationship with it, including beneficiaries, shareholders, contractors, suppliers, agents, partners, customers, allies (included Joint ventures) and suppliers, in addition to the personnel and companies that the contractors engage for the execution of the agreed activities. Therefore, the knowledge and application of this Code will be mandatory for its recipients, who must ensure that their actions are always framed within its rules'. However, it is not clear it has prohibition of retaliation which also covers individual stakeholders and communities at business partners level [as it is not clear the mechanism is open to them]. [Code of Ethics, 04/2018: <a href="http://google.com">google.com</a>]</li> </ul>
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	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: Complainants not asked to waive legal rights: The webpage section Due Diligence indicates: 'Ecopetrol has accessible internal and external channels so that all Stakeholders can express their disagreements, expectations, and needs to the Company. This is how Ecopetrol manages, analyzes, and provides a timely and quality response to their requests. Ecopetrol recognizes that access to these channels is not a condition or impediment for those who consider to be affected, to resort to the mechanisms provided by the State, for the attention of their requests, complaints, and claims'. The Guide on Human Rights and Business indicates: 'Ecopetrol acknowledges that access to these communication channels is neither a condition nor an impediment for those who consider themselves affected, to resort to mechanisms provided by the State for handling grievances and claims. Therefore, those who use such communication channels are not required to waive their right to file a claim through judicial or administrative processes, as a precondition for filing their claims'. [Due Diligence in Human Rights_web, 30/04/2020: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>] &amp; [Guide on Human Rights and Business, 06/04/2022: <a href="http://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Does not require confidentiality provisions: The Company has provided comments to CHRB regarding this indicator. However, its content has not been found in publicly available sources.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Cooperates with state based non judicial mechanisms: The Guide on Human Rights and Business indicates: 'Regarding the controversies originated within the framework of its operation, notwithstanding the right of the community or any other stakeholder to have access to the administration of justice, Ecopetrol promotes the use of Alternative Dispute Resolution Mechanisms (ADRM, or MASC from its name in Spanish) which, in the case of Ecopetrol S.A., since it is a state-owned company, must always be preceded by compliance with the requirements of state responsibility and subject to the control of the Attorney General's Office and the contentious-administrative jurisdiction. Ecopetrol acknowledges that the National Contact Point, provided for in the Guidelines of the Organization for Economic Cooperation and Development (OECD), regulated through Decree 1400/2012 and currently headed by the Colombian Ministry of Commerce, Industry and Tourism, is a mediation mechanism for situations in which there is controversy regarding the application of the aforementioned Guidelines'. [Guide on Human Rights and Business, 06/04/2022: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Not Met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse 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: Describes approach taken to remedy adverse HRs impacts: The Company has provided comments to CHRB regarding this indicator extendedly disclosing the guidelines for Human Rights integration in its business practice, including: communication, planning, identification, evaluation, treatment, and monitoring of the identified risk. However, this subindicator looks for a description of the approach it took to provide or enable a timely remedy for victims, for adverse human rights impacts which it has caused or to which it has contributed. This indicator is about remedy to make up for an impact that has already taken place, rather than mitigation of impacts. [Human Rights Risk Management Cycle Guide, 26/01/2022: <a href="saaeuecprdpcep.blob.core.windows.net">saaeuecprdpcep.blob.core.windows.net</a>]</li> <li>• Not Met: Describes how remedy would be provided if no adverse impact identified: The webpage section Due Diligence describes the grievance mechanism and notes: 'In accordance with the type of petition filed, response times may vary from 10 to 30 business days. This term may be expanded up to twice the initial term'. However, this subindicator looks for a description of the approach it would take to provide or enable timely remedy for victims [if no adverse impacts have been identified]. Timescales are assessed in C.4. [Due Diligence in Human Rights_web, 30/04/2020: <a href="ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes changes to systems, processes and practices to prevent future impacts: The Company has provided comments to CHRB regarding this indicator extendedly disclosing the guidelines for Human Rights integration in its business practice, including: communication, planning, identification, evaluation, treatment, and monitoring of the identified risk. However, the subindicator looks for a description of changes to systems, processes and practices to prevent similar adverse impacts [adverse human rights impacts which it has caused or to which it has contributed] in the future. No further evidence found. [Human Rights Risk Management Cycle Guide, 26/01/2022: <a href="saaeuecprdpcep.blob.core.windows.net">saaeuecprdpcep.blob.core.windows.net</a>]</li> <li>• Not Met: Describes approach to monitoring/implementing agreed remedy: The Company has provided comments to CHRB regarding this indicator extendedly disclosing the guidelines for Human Rights integration in its business practice, including: communication, planning, identification, evaluation, treatment, and monitoring of the identified risk. As for monitoring, it notes: 'The purpose of this stage is to conduct periodic monitoring of the treatment measures established in the previous stage. This monitoring must be conducted by the responsible areas at least twice a year and, depending on the severity of the risk, the responsible area must determine whether more constant monitoring is required. At this stage, the results of the adopted measures must be recorded to determine whether it is necessary to update the risk (there assessment thereof), maintain the adopted measures, or adopt new ones. The effectiveness of the controls or measures, as well as the results of the follow-up, must be reported to the corresponding level of supervision, and once they have been valued and reported as 3 or 4, the follow-up thereon must be communicated to the GRT'. However, this subindicator looks for a description of its approach to monitoring implementation of the agreed remedy for victims in the context of grievance mechanisms. Current evidence seems to focus on monitoring the actions in the context of risk management, which is assessed in</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>B.2.4. [Human Rights Risk Management Cycle Guide, 26/01/2022: <a href="http://saauecprdrpecp.blob.core.windows.net">saauecprdrpecp.blob.core.windows.net</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Describes approach to learning from incidents if no adverse impacts identified</li> </ul>
C.8	Communication on the effectiveness of grievance mechanism(s) 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: Discloses number of grievances filed, addressed or resolved and outcomes achieved: The 2022 Integrated Management Report notes: '55,575 PQRS [petitions, complaints, claims, and requests] were managed throughout 2022: 40,438 were petitions and 15,137 complaints and claims. Also, 543 congratulation messages were received, accounting for a timely management indicator of 99.94% (32 cases addressed outside the terms of the law)'. It discloses a table with 'Main Issues of Dissatisfaction of Ecopetrol Stakeholder Groups'. It includes: Community support [1,423], Damage to third parties generated by Ecopetrol or by contractors [1,226], Discontent with payroll settlement [625], Alleged breach of contractors' labor obligations [613]. However, no information found specifically on the number of human rights related grievances filed, addressed or resolved and outcomes achieved for its own workers, for external individuals and communities that may be adversely impacted by the Company. [2022 Integrated Management Report, 2023: <a href="http://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Met: Example of how lessons from mechanism improved HRs management system: The report also indicates that 'The Citizen Participation Office monitors the relationships with its Stakeholder Groups. The purpose is to identify opportunities for process improvement using the PQRS received by the Company as a source of information, pinpointing expectations, non-conformities, process deviations, and alarms in the environment, and conducting a trend analysis of the PQRS and, in general, detecting situations that may affect the relationship by conducting monitoring reports, reporting PQRS sensitive to alarms, and using KRIs as a control limit methodology based on historical data. By monitoring 17 grouped issues, Ecopetrol analyzes the behavior of 80% of all complaints received, allowing the Company and its decision makers to be alerted about the behavior of issues that entail business or process risks; once the trends and risk issues have been identified, an alert is sent to the Citizen Participation Office, which then conducts a root cause analysis and establishes improvement or mitigation plans to reduce said dissatisfactions to zero. [...] The information arising from the PQRS, as well as the different participation scenarios promoted by Ecopetrol and/or those in which it participates, allows the identification of opportunities for improvement in the Company's processes and the structuring of alternative solutions to situations of dissatisfaction'. [2022 Integrated Management Report, 2023: <a href="http://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes process to evaluate mechanism and changes made as a result: The 2022 Integrated Management Report notes: 'Ecopetrol has implemented guidelines with procedural and instrumental tools to ensure that the right of petition is managed. As part of the control and monitoring measures, indicators are implemented to measure the opportunity in citizen service, as well as internal management indicators to determine the quality and opportunity of the times established within the process'. However, the Company is also expected to provide an example of changes made to improve it based on the review, no further evidence found. [2022 Integrated Management Report, 2023: <a href="http://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Not Met: Describes procedures to address delays of outcomes agreed with stakeholders: The Company indicates that it 'has implemented guidelines with procedural and instrumental tools to ensure that the right of petition is managed. As part of the control and monitoring measures, indicators are implemented to measure the opportunity in citizen service, as well as internal management indicators to determine the quality and opportunity of the times established within the process'. However, no further description found, including the procedures it has in place to address delays or non-implementation of outcomes agreed with stakeholders. [2022 Integrated Management Report, 2023: <a href="http://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul>

## D. Performance: Company Human Rights Practices (25% 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: Pays living wage or sets time-bound target: The 2022 Integrated Management Report notes: 'Ecopetrol offers a Compensation Policy that ensures working conditions to encourage employees to give the Company their maximum commitment and potential, in order to attract, generate loyalty, and ensure the retention of the human talent required for the advancement of the strategy. The main total compensation components at Ecopetrol are fixed compensation, benefits, and variable compensation'. It adds: 'In 2022, the current legal monthly minimum wage [...] in Colombia was 1,000,000 COP. At Ecopetrol, according to the salary structure in force as of January 1, 2022, the lowest defined monthly salary is COP 2,320,200 (2.31 SMLV), which is equivalent to 132% more than the legal minimum salary'. However, no information about operations in other countries found. Although the Report indicates Ecopetrol S.A. only operates in Colombia, Ecopetrol Group has operation in other countries. [2022 Integrated Management Report, 2023: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Not Met: Describes how living wage determined: The 2022 Integrated Management Report discloses information on its fixed compensation: 'Fixed compensation consists of all guaranteed payments received by employees. In addition to the basic salary, it includes legal and extra-legal benefits and other components. In fixed compensation (monetary income), Ecopetrol offers a salary range between 80% and 120% of the reference market, allowing a progressive salary increase for employees, according to performance requirements, experience, skills, and other criteria, and also according to the labor expense budget defined for each term. An equity analysis is systematically conducted to ensure that the employees who hold equivalent positions receive a fixed compensation within the established ranges, according to the level of the position held'. However, it is not clear the process to determine a living wage for the regions where it operates includes involvement of relevant trade unions [or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law]. [2022 Integrated Management Report, 2023: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Achieved paying living wage: The Company states that 2.4 times the legal minimum wage of Colombia and indicates that it is enough as a living wage. However, other countries' operations are not described. [Integrated Sustainable Management Report 2021, 2021: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Not Met: Reviews definition living wage with unions: The Company has provided sources to the subindicator, however, they were in Spanish and only documents in English are accepted according to CHRB criterion.</li> </ul>
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	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: Member of EITI: The 2022 Integrated Management Report notes the Company partakes in 'Extractive Industries Transparency Initiative (EITI)'. Its webpage Indexes and rankings contains the same information. However, it is not clear it is an EITI member. [2022 Integrated Management Report, 2023: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Not Met: Reports of taxes and revenues beyond legal minimums: The Company has provided comments to CHRB regarding this indicator, however, it is not clear it publicly reports, by country, the taxes and revenue payments to some countries beyond legal requirements for disclosure. [TesG, N/A: <a href="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 a tax report which indicates the payments to all countries where it operates. [Tax Report Ecopetrol Group, 2021: <a href="ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul>
D.3.3	Freedom of association and collective bargaining (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>• Met: Measures to prohibit violence/retaliation against workers for joining trade union: The Company follows the regulation aimed to protect the workers' trade union rights. Significant union recognition, as seen below, is considered a proxy for not intimidating or retaliating in practice. [Guide for labor aspects in activities contracted by Ecopetrol, 26/01/2022: <a href="saaeuecprpdpecp.blob.core.windows.net">saaeuecprpdpecp.blob.core.windows.net</a>]</li> <li>• Met: Discloses % of total direct operations covered by CB agreements: The Company states that 'in accordance with the legal provisions that regulate the matter, the Current Collective Bargaining Agreement applied to 77.7% of total Ecopetrol S.A. Workers.' [Integrated Sustainable Management Report 2021, 2021: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Meets both requirements under score 1</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.4	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own extractive operations, which includes JVs)	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: Describes process to identify H&amp;S risks and impacts: The Company states the following: 'Although there are different methodologies for identifying hazards, analyses, and risk assessments depending on the type of hazard, Ecopetrol uses the "bowtie" methodology for hazards associated with industrial safety, and for occupational health hazards and risks, the Company applies the HRA (Health Risk Assessment) methodology. A task risk analysis must be conducted for all activities, which must be prepared in advance and approved by competent personnel from the executing party and by the person in charge of the area where the activity will take place. Each hazard identification and risk analysis and assessment methodology defines intervention priorities by applying controls aligned with the hierarchy established in the ISO 45001:2018 standard. Risk analysis is applied continuously to each activity, and health and "bowtie" risks are updated periodically or each time a new hazard is identified, a new production or technological process is introduced, or a change is made that may pose risks to the health of people or the environment.' It further states that 'workers have a tool at their disposal for reporting unsafe behaviors and conditions, either electronically or via telephone. Visits, inspections, and spaces for conversation between leaders and collaborators are also facilitated to report dangerous situations and conditions and strengthen existing controls.' [Integrated Sustainable Management Report 2021, 2021: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Met: Discloses injury rate or lost days for last reporting period: The Company discloses an injury rates of 0.37 in 2021. [Integrated Sustainable Management Report 2021, 2021: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Met: Discloses fatalities for last reporting period: The Company discloses the fatalities rate for last reporting period. According t the evidence provided by the company there were no fatalities related to workplace accidents among its own employees in 2021 and 0 among employees of contracting companies. Fatalities related to occupational disease for the Company's own employees in 2021 are stated as 0. [Integrated Sustainable Management Report 2021, 2021: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Met: Discloses occupational disease rate for last reporting period: The Company discloses the number of cases of occupational illnesses and diseases in 2021 to have been 3. [Integrated Sustainable Management Report 2021, 2021: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Set targets for H&amp;S performance: The Company discloses short, medium and long term targets for "Frequency rate of process safety incidents. [Corporate Governance Code Ecopetrol S.A, N/A: <a href="ecopetrol.com.co">ecopetrol.com.co</a>] &amp; [Integrated Sustainable Management Report 2021, 2021: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Not Met: Met targets or explains why not or actions to improve H&amp;S management systems: Regarding stakeholders Involved in Taking Action to Manage Process Safety, the 2022 Integrated Management Report notes: 'The employees and contractors that make up the different areas of Ecopetrol and its affiliated companies are responsible for managing the measures to prevent or mitigate potential negative impacts. The Stakeholder Groups, such as local authorities and communities, are informed of the management exerted for the high consequence scenarios identified in the Ecopetrol Group's different areas of influence. The different work teams participate in the drafting and implementation of national regulations in partnership with government authorities and associations'. However, no further details of how it works to improve its health and safety management systems found. [2022 Integrated Management Report, 2023: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul>
D.3.5	Indigenous peoples' rights and free prior and informed consent (FPIC) (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: Process to identify/recognise indigenous rights holders: The 2022 Integrated Management Report notes: 'For engagement with ethnic communities and the development of activities in their territory, Ecopetrol has adopted instruments such as the Human Rights and Business Guide, the Guide for engaging with ethnic communities, and the Procedure for prior consultations, which guide and organize engagement processes with ethnic communities, based on the determinations made in international and national instruments for the protection of Human Rights'. However, it is not clear the process it has in place to identify and recognise affected indigenous peoples. [2022 Integrated Management Report, 2023: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Describes how indigenous communities are engage during assessment: The Guide on ethnic community relations indicates its objective: 'Establish relationship guidelines with ethnic communities settled in Ecopetrol S.A.'s areas of interest, within the framework of current legal regulations and business best practices, with the objective of aligning the viability and sustainability of activities, projects, and operations, with ethnic communities' social, political, economic and cultural dynamics'. However, it is not clear whether the Company engages with indigenous communities in carrying out the impact assessment of operations/proposed operations company-wide. [Guide on ethnic community relations(Ecopetrol S.A.), 06/12/2021: <a href="http://saauecprdrpecp.blob.core.windows.net">saauecprdrpecp.blob.core.windows.net</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to FPIC: The Company states that 'In Colombia, free, prior, and informed consent is necessary for the implementation of projects involving any of the situations below specified by the Constitutional Court.' But, the information about other countries' operations is not disclosed. [Integrated Sustainable Management Report 2021, 2021: <a href="http://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Not Met: Recent example of obtaining FPIC or not pursuing indigenous people's land/resources: The 2022 Integrated Management Report notes: 'In 2022, Ecopetrol had nine (9) projects undergoing prior consultation processes. Four (4) of these closed their consultation processes, and one (1) corresponded to the notarization of agreements for the modification of the environmental instrument (Development of the Occidente Norte Area)'. However, this subindicator looks specifically for the most recent example where it has obtained free prior and informed consent (FPIC) or where it decided not to pursue the land or resources impacting on indigenous peoples. No further evidence found. [2022 Integrated Management Report, 2023: <a href="http://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul>
D.3.6	Land rights: Land acquisition (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: Describes approach to indentifying lang tenure rights holders and negotiating compensation: The webpage section Land Rights indicates: 'Ecopetrol has a procedure in place for population resettlement, based on the United Nations Guiding Principles on Business and Human Rights - PRNU, and international policies on population resettlement: World Bank OP 4-12, the IDB standard OP-710 and the Manual for the preparation of the resettlement plan of the International Finance Corporation - IFC. The procedure establishes the conceptual and methodological route to prevent, mitigate, correct, and compensate the economic and social impacts caused by the involuntary displacement of the population, caused by the Company's operations and projects. Likewise, it defines the actions to reestablish socioeconomic conditions and generate an opportunity to improve the conditions of the population to be resettled'. However, it is not clear how it identifies legitimate tenure rights holders, including through engagement with the affected or potentially affected communities in the process, with particular attention to vulnerable or marginalised tenure rights holders and how it negotiates with them to provide adequate compensation or requested alternatives to financial compensation. [Land rights_web, 05/2023: <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 approach to compensation including valuation: The webpage section Land Rights indicates: 'Ecopetrol has a procedure in place for population resettlement, based on the United Nations Guiding Principles on Business and Human Rights - PRNU, and international policies on population resettlement: World Bank OP 4-12, the IDB standard OP-710 and the Manual for the preparation of the resettlement plan of the International Finance Corporation - IFC. The procedure establishes the conceptual and methodological route to prevent, mitigate, correct, and compensate the economic and social impacts caused by the involuntary displacement of the population, caused by the Company's operations and projects. Likewise, it defines the actions to reestablish socioeconomic conditions and generate an opportunity to improve the conditions of the population to be resettled'. However, no details found on how legitimate tenure rights holders are involved in determining the valuation. [Land rights_web, 05/2023: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> <li>• Not Met: Describes steps to meet IFC PS 5 in state deals: The Company follows the 'Performance Standard 7: Indigenous people of the International Finance Corporation (IFC)' and adheres the 'Handbook for Preparing a Resettlement Action Plan' of IFC. However, no details found on specific steps followed to meet IFC PS5 in state deals. [Human Rights Risk Management Cycle Guide, 26/01/2022: <a href="http://saauecprdrpecp.blob.core.windows.net">saauecprdrpecp.blob.core.windows.net</a>] &amp; [Derechos sobre la tierra, 11/02/2021: <a href="http://ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.7	Security (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>• Met: Describes security implementation (incl. VPs or ICOC) and provides an example: The 2021 Integrated Management Report states that it 'enters into contracts with private security companies, which contain a common clause based on the Voluntary Principles on Security and Human Rights related to private security.' Besides that, the Company states to 'establishes training requirements for all direct workers and organizations providing security staff' concerning specific human rights policies and procedures, and it ensures that 2,947 security workers have participated. The 2022 Integrated Management Report notes: 'as part of all contract clauses, Ecopetrol lays down control mechanisms and performance measurements in all contractual activities, including human rights. Every six months, Ecopetrol reviews all non-compliances with Human Rights clauses. Training is also provided to strengthen capabilities and ensure joint processes. The contracts incorporate an ethics, transparency, and compliance clause, empowering Ecopetrol to conduct administrative, financial, operating, and compliance audits to verify compliance with anti-bribery laws and the guidelines contained in the Company's Code of Ethics and Conduct'. [Integrated Sustainable Management Report 2021, 2021: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [2022 Integrated Management Report, 2023: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Met: Ensures Business Partners/JVs follow security approach: The Company states that '100% of its security contracts entered into by Ecopetrol contain a specific clause on the Voluntary Principles on Security and Human Rights.' Also, as indicated above, the Company 'establishes training requirements for all direct workers and organizations providing security staff' concerning specific human rights policies and procedures, and it ensures that 2,947 security workers have participated'. [Integrated Sustainable Management Report 2021, 2021: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Security and HRs assessment includes input from local communities: The 2022 Integrated Management Report notes: 'Ecopetrol has established the OPC to receive Petitions, Complaints, Claims, and Suggestions (PQRS) from all Stakeholder Groups. Also, periodic meetings are held with the security forces to review and update the analysis of security and human rights risks and exchange information on the concerns submitted through the grievance mechanism on human rights impacts in the territories'. However, no evidence found that its security and human rights assessments [beyond grievance mechanisms] include inputs from the local community, including about their security concerns. [2022 Integrated Management Report, 2023: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Not Met: Two examples of working with local communities to improve security [Due Diligence in Human Rights_web, 30/04/2020: <a href="https://ecopetrol.com.co">ecopetrol.com.co</a>]</li> </ul>
D.3.8	Water and sanitation (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>• Met: Describes preventative/corrective action plans for water and sanitation risks: The Company states that 'By implementing actions to reduce the water footprint, potential environmental impacts and water-associated conflicts are also reduced, thus promoting water security in the environment.' In this way, some actions such as improving operational efficiency in water management by maximizing internal reutilization and the use of alternative water sources, besides that they intend to implement collective actions to protect water basins compensating the use of water in its own operations. [Integrated Sustainable Management Report 2021, 2021: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Sets targets on water stewardship that consider water use by local communities: The Company has short, medium and long-term targets and it states that 'The Integrated Water Management Roadmap towards Water Neutrality sets goals to optimize water use, maximize reutilization, increase reutilization, and reduce water catchments and discharges.' These goals are specified in the sequency and the local factors are taken into account through the information provided by the e Group's businesses in the SIGAR-Aguas tool. [Integrated Sustainable Management Report 2021, 2021: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> <li>• Met: Reports progress in meeting targets and trends demonstrating progress: The Company discloses the results of efforts made since 2019 for reduction, reutilization, recovery and treatment of water, and it also discloses the reduction of water collection for its operations, what matches with the Company's target. [Integrated Sustainable Management Report 2021, 2021: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.9	Women's rights (in own extractive operations, which include JVs)	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: Describes processes to stop harassment and violence against women: The Guide for labor aspects in activities contracted by Ecopetrol states that 'it deems pertinent to create mechanisms that promote the inclusion of populations with difficult labor insertion [...]', however it does not describe a process to stop harassment. It also states in the Code of Ethics and Conduct that everyone attached to it must not harass the workmates. The 2022 Integrated Management Report notes: 'It adopts a zero-tolerance approach to discrimination and harassment, for which it has policies and programs that specify its commitment to non-discrimination and the prohibition of harassment in all its forms, among others. The Company has similarly implemented measures to prevent these situations and has set the corresponding training guidelines, especially on issues such as the complaint process, behaviors constituting discrimination or violence, escalation of incidents, and corrective and disciplinary measures associated with confirmed behaviors of harassment or discrimination'. The webpage section Diversity and Inclusion Program further explains the Program. [Guide for labor aspects in activities contracted by Ecopetrol, 26/01/2022: <a href="https://saeuecprdrpecp.blob.core.windows.net">saeuecprdrpecp.blob.core.windows.net</a>] &amp; [Code of Ethics, 04/2018: <a href="https://google.com">google.com</a>]</li> <li>• Not Met: Working conditions take into account gender issues</li> <li>• Not Met: Measures and steps to address gender pay gap at all levels of employment: The 2022 Integrated Management Report indicates that 'In terms of human talent, the Company adopts labor practices aligned with this framework, applicable to the Board of Directors, senior management, and all people working at the Ecopetrol Group. In this sense, it is worth highlighting the Diversity and Inclusion Program (DEI), which is based on the principles of meritocracy, equity, and justice'. The webpage section Diversity and Inclusion Program explains the objectives of the programme: 'Our objectives are: "More diverse Talent": 40-70% of the candidates in the recruitment process must be people from underrepresented groups (Women, People with Disabilities, Ethnicities, Veterans, Victims of internal conflicts, Ex combatants, First employment young people) in 2030. "An inclusive experience for all": &gt;= 90 pts, favorability on DEI experience of our stakeholders (employees, suppliers and community) in 2030 "High standards on DEI to foster innovation and equal opportunities": 4,5 GDIB, 90 pts. and progress in Ranking SOGI, WEPs, Par y and Equipares'. However, no details found on the process to address gender pay gap, including at all levels of employment. [Integrated Sustainable Management Report 2021, 2021: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>] &amp; [2022 Integrated Management Report, 2023: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Met: Provides analysis of trends demonstrating closing gender pay gap: The 2022 Integrated Management Report notes: 'The salary segregation index is designed to monitor the salary differences between population groups. Both men and women are used for the current base'. It discloses salary segregation indexes between 2019 to 2022. It uses Equipares Methodology. It adds 'the average wage difference in 2022 between men and women was 2.1%'. [2022 Integrated Management Report, 2023: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</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>• Area: Right to safe, clean, healthy and sustainable environment</li> <li>• Headline: Colombia's attorney general launches a probe into Ecopetrol oil spill in Santander province</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. On February 9, 2021, the National Environmental Licensing Authority (ANLA) imposed a fine of COP 3,863,918,267 (EUR 858,000) for the oil spill in the vicinity of the Lisama 158 well occurred in March 2018. On November 18, 2021 during a protest involving road blocks and confrontation with authorities a protester was shot by police and died. [Reuters, 03/04/2018, "Colombia's attorney general to investigate Ecopetrol oil spill": <a href="https://www.reuters.com">reuters.com</a>] [The Bogota Post, 12/04/2018, "Oil spill wreaks havoc in La Lizama, Santander": <a href="https://www.thebogotapost.com">thebogotapost.com</a>] [Ecowatch , 27/03/2018, "More Than 2,400 Animals Killed by Oil Spill in Colombia": <a href="https://www.ecowatch.com">ecowatch.com</a>] [Business &amp; Human Rights Resource Centre, 14/12/2021, "Colombia: Michelsen Vargas, a young man protesting Ecopetrol's Cenit, dies after being shot by police": <a href="https://www.business-humanrights.org">business-humanrights.org</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: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response: After the announcement of the opening of the investigation, Ecopetrol Chief Executive Officer Felipe Bayon Pardo told journalists late on Monday the company will cooperate fully with all three investigations. In addition, Bayón, told the Fifth Committee of the Senate, who are debating the disaster, that “we are committed to solving this emergency, we take responsibility for the final closure of the well and the compensation of the communities affected.” The company also declared that the spill was contained and posed no threat to drinking water sources. The Company also provided a statement addressing the death of Mr. Michelsen Vargas in 2021. [Ecowatch, 27/03/2018: <a href="https://www.ecowatch.com">ecowatch.com</a>] [The Bogota Post, 12/04/2018: <a href="https://www.thebogotapost.com">thebogotapost.com</a>] [Business and Human Rights Resource Centre, 15/12/2021, "Respuesta de Ecopetrol sobre asesinato y heridos en Bolívar, Santander": <a href="https://www.business-humanrights.org">business-humanrights.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Detailed response: The company did address all aspects of the allegations in its Integrated Management Report 2022, which it declares: 'Ecopetrol continues with the execution of the environmental recovery activities established due to the contingency presented in the Lisama 158 well in March 2018, following the actions described in the Environmental Recovery Plan - PRA, which integrated the guidelines and management measures set forth in the Comprehensive Environmental Management Plan Applicable to Seas, the recommendations issued by the Alexander von Humboldt Institute (IAvH), the guidelines generated by the UN, and the advice of partner expert consultants, the Geotechnology company, and Universidad Industrial de Santander - UIS'. [2022 Integrated Management Report, 2023: <a href="https://files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul>
E(1).2	The company has investigated and taken	2	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Engaged with stakeholders: Ecopetrol said that: 'As part of the strategy for the advancement of environmental recovery, engagement sessions were held with communities, authorities, and institutions, including spaces for tripartite dialogue</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
	appropriate action		<p>and systematic meetings with artisanal fishermen. These spaces led to the establishment of a two-way communication channel with stakeholders, presenting the progress made on the PRA and the complementary measures adopted with the communities of influence'. [2022 Integrated Management Report, 2023: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</p> <ul style="list-style-type: none"> <li>• Met: Identified cause: Felipe Bayón, the president of Ecopetrol, has said he believes that seismic activity—and not technical failures—caused Lizama 158 to crack.</li> </ul> <p>In the company's Annual Report on Form 20-F 2018, it is reported that "Ecopetrol's internal investigation concluded that there were four concurrent critical factors leading to the incident and that in the absence of any of them, the incident would not have occurred.</p> <p>The four critical factors were the following: a reservoir in natural overpressure, the rupture or failure of the "blanking plug, presence of a natural system of geological faults in the area, time of exposure" [Smithsonian magazine, 03/04/2018, "Oil Spill in Colombia Kills 2,400 Animals": <a href="smithsonianmag.com">smithsonianmag.com</a>] [Form 20-F 2018, 05/04/2019: <a href="google.it">google.it</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Identified and implemented improvements: When the size of the spill became apparent, Ecopetrol responded installing mechanical booms to slow the progress of the oil downriver and hiring multiple work teams to remove as much as possible from the waterways and surrounding vegetation. They imported mechanical equipment from the US to seal the well, and have been supplying humanitarian aid and supplies to affected communities.</li> </ul> <p>Pursuant to the Environmental Recovery Plan as approved by ANLA, Ecopetrol carried out tasks, such as fine cleaning in the affected bodies of water, wildlife reincorporation in the Lizama and Caño La Muerte streams, beginning the recovery of the riparian forest by planting native species of the region and structuring 33 social and environmental investment projects in the aggregate amount of COP\$ 23,769 million, among the main activities.</p> <p>Ecopetrol continued monitoring activities in the following years to verify the quality of surface water, groundwater, sediments and air, with results that fall within the reference values allowed by the environmental authority.</p> <p>According to the company's Annual Report on Form 20-F 2018, on May 27, 2018, after ensuring that the activities were successfully performed to control the spill, the 63 families (approximately 177 individuals) which were directly affected by the spill returned to their homes. [CISION, 09/02/2021, "Ecopetrol Reports on the Environmental Agency ANLA's Decision on Lisama 158": <a href="prnewswire.com">prnewswire.com</a>] [The Bogota Post, 12/04/2018: <a href="thebogotapost.com">thebogotapost.com</a>] [Form 20-F 2018, 05/04/2019: <a href="google.it">google.it</a>]</p> <ul style="list-style-type: none"> <li>• Met: Stakeholder input to steps taken: Ecopetrol said that: 'As part of the strategy for the advancement of environmental recovery, engagement sessions were held with communities, authorities, and institutions, including spaces for tripartite dialogue and systematic meetings with artisanal fishermen. These spaces led to the establishment of a two-way communication channel with stakeholders, presenting the progress made on the PRA and the complementary measures adopted with the communities of influence'. [2022 Integrated Management Report, 2023: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul>
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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: Provided remedy: See above. The company describes 'actions [that] were adopted as part of the comprehensive management of biodiversity for the ecosystemic recovery of the area.' [2022 Integrated Management Report, 2023: <a href="files.ecopetrol.com.co">files.ecopetrol.com.co</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders: As local residents were still protesting in 2021, it can be assumed that they did not consider the actions taken in 2018 to be satisfactory. [Business &amp; Human Rights Resource Centre, 14/12/2021: <a href="business-humanrights.org">business-humanrights.org</a>]</li> <li>• Met: Remedy delivered: The company indicates that the affected families were returned to their homes.</li> <li>• Not Met: Independent remedy process used</li> </ul>

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