	HUMAN RIGHTS RISK MANAGEMENT CYCLE GUIDE		
	Corporate Responsibility General Counsel and Secretary to the CEO		
	Code GEE-G-042I	Prepared ON 26/01/2022	Version: 1

1. OBJECTIVE

This document provides guidelines for addressing Human Rights (HHRR) risks within Ecopetrol Group (GE, by its Spanish acronym, Ecopetrol, the Company), by defining key concepts and considerations for the planning, identification, evaluation, treatment, and monitoring of HHRR risks. This, in accordance with the provisions set forth in Ecopetrol Group's Integrated Risk Management Guide (GEE-G-029) and the highest national and international HHRR standards.

2. DEVELOPMENT

2.1. SCOPE

The General Counsel (SEG, by its Spanish acronym), through Corporate Responsibility (GRT, by its Spanish acronym), is accountable for Human Rights (HHRR) governance in Ecopetrol Group. For this task, it develops guidelines to steer the Company towards adequate HHRR due diligence by all areas and companies subject to this Guide.

The Human Rights Risk Management Guide defines the criteria and the process by which these risks are planned, identified, evaluated, treated, and monitored, under the principle of due diligence established in international and national standards.¹


Given that human rights crosscut the Company's management, and are also relevant to all stakeholders, this guide is regulatory in nature and applies to all units, processes, and systems at Ecopetrol and its Group.²

The HHRR risk management cycle must be applied in the systems, processes, or activities³ in which there is a propensity to impact stakeholder groups negatively or positively, especially the community,

¹ In accordance with the Guide on Human Rights and Business, due diligence involves a set of interrelated processes to identify negative impacts, prevent and mitigate them, monitor the implementation of these processes and their results, and report on how negative impacts are addressed with respect to the company's activities, their supply chains, and other commercial relationships.

² This document is applicable to the companies controlled by Ecopetrol S.A. and its subsidiaries (Ecopetrol S.A., Cenit, Hocol, Esenttia, Ecopetrol América, Ecopetrol Brasil, Ecopetrol México, Ecopetrol Costa Afuera, and Refinería de Cartagena). The terms "Ecopetrol," "we," "our," or the "Company" are then used to refer to companies consolidated into Ecopetrol S.A. and its subsidiaries. The other companies of the Ecopetrol Group may be guided by or implement these guidelines.

³ This HHRR risk cycle shall always be applied for "disaster scenarios," in accordance to the criteria defined in the Process Risk Management Guide and Dynamic Risk Management Model (GDR) - HSE-G-034, described as follows: • Scenarios that have the potential to generate multiple fatalities of people not involved in the operation and that may exceed the capacity of the emergency services at the regional level, or • Loss of containment scenarios that have the potential to generate intense, serious, and widespread environmental effects, and that, given the hazard of the substances involved, require complex environmental recovery processes, or 4 • Loss of containment scenarios in transport pipelines (crude oil or refined products), which may compromise the supply of vital services by more than three (3) days, in at least one (1) municipality with category: special, first, or second (Law 1551 of 20127), or • Loss of containment scenarios that require the evacuation of more than 400 households (approximately 1,240 people) for more than five (5) days, or • Loss of containment scenarios in offshore operations as a consequence of a loss of well control (blow-out?), or • Loss of containment scenarios in river and coastal ports that can generate intense, serious, and widespread environmental effects, as a result of the hazardous characteristics of the substances involved and the difficult control of the emission source.

	HUMAN RIGHTS RISK MANAGEMENT CYCLE GUIDE		
	Corporate Responsibility General Counsel and Secretary to the CEO		
	Code GEE-G-042I	Prepared ON 26/01/2022	Version: 1

and society, as well as employees, retirees and their beneficiaries, and contractor and vendor employees who are Human Rights holders.⁴

2.2. REGULATORY REFERENCES

The Guide on Human Rights and Business determines that Ecopetrol adheres to and/or follows, among others the international standards below:

- The International Bill of Human Rights
- The United Nations Guiding Principles on Business and Human Rights
- The Ten Principles of the Global Compact
- The ILO Declaration on Fundamental Principles and Rights at Work
- The OECD Guidelines for Multinational Enterprises
- The Voluntary Principles on Security and Human Rights
- Convention 169 of the International Labor Organization
- Performance Standard 7: Indigenous Peoples of the International Finance Corporation (IFC), Principles for the Empowerment of Women
- The Global Standard of Conduct for the protection of LGTBI persons in companies
- The Guide for companies on the Rights of Persons with Disabilities

All these standards contain a series of guidelines to steer human rights actions of companies in different areas, and with different population groups. However, in order to identify risks and impacts on human rights, we must consider that Ecopetrol is committed to respecting all internationally recognized human rights set forth in the International Charter of Human Rights (Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, and International Covenant on Economic, Social, and Cultural Rights) available at:

<https://www.ohchr.org/SP/ProfessionalInterest/Pages/CoreInstruments.aspx>.

2.3. DEFINITION OF HHRR RISKS


The particularity of HHRR risks is that they are related to situations in which one or more human rights holders (all human beings) may be affected, as a direct or indirect consequence of the business activities, and not to those situations that may affect the performance of the company. In this sense, "a company's human rights related risks are the risks in which their activities may cause one or more negative consequences on human rights."⁵

The United Nations Guiding Principles on Business and Human Rights (UNGPR) make a distinction between "real" and "potential" consequences on human rights. A real consequence is one that has occurred or is occurring. A potential consequence is one that may occur but has not yet occurred. Real consequences require redress, while potential consequences -or human rights related risks- require the adoption of measures to prevent them from materializing, or at least to mitigate their intensity.⁶

⁴ These stakeholder groups are explicitly mentioned due to their capacity as human rights holders. This does not mean that the activities or processes involving other stakeholder groups, such as partners, suppliers, clients, or the State, are not subject to this risk management cycle.

⁵ [1242258_HHRR_PUB_12_02_SPA.pdf \(acnudh.org\)](#), P.8.

⁶ *Opcit*, P. 19

	HUMAN RIGHTS RISK MANAGEMENT CYCLE GUIDE		
	Corporate Responsibility General Counsel and Secretary to the CEO		
	Code GEE-G-042I	Prepared ON 26/01/2022	Version: 1

HHRR risks can be identified at any of the risk management levels established in the Integrated Risk Management System, namely, at the strategic, tactical, and operational levels. In the first two levels, the Vice-Presidency of Compliance is responsible for the identification and monitoring thereof. At the operational level, all areas of the Company are responsible for adhering to these guidelines.

2.4. PROCESS

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 in the following stages:

1. Communication

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 sources⁷ 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.


Also, for a better understanding of the risk, it is highly recommended to have information from HHRR holders (their perception and knowledge), and from external sources, that document human rights aspects and situations in the areas where the company carries out or expects to carry out its operations⁸.

In developing the principle of "differential approach"⁹ defined in the Guide on Human Rights and Business (ECP GEE-G-035), it is important to consider that, in particular settings, certain population

⁷ Among the sources that may be consulted are the Citizen Participation Office, Corporate Responsibility, and the context, environmental, and legal teams.

⁸ Since the information must be based on historical and current facts, the following sources are recommended: The Ombudsman's Office, Early Warning System; The National Center for Historical Memory (CNMH); The Observatory of memory and conflict; The Observatory of Human Rights and IHL of the Presidential Human Rights Council; The Thematic Rapporteurs Program of Universidad de Los Andes; Independent Thought Centers; sector reports (for example, UNICEF reports on children's rights); internal and external experts.

⁹ Differential approach: Ecopetrol Group respects the rights of people who belong to groups or populations whose human rights may be particularly vulnerable to adverse impacts. In undertaking its business activities, the group shall apply the differential approach to prevent, mitigate, or remedy such impacts. The components of the differential approach include the gender and the ethnic approach, among others. The subjects of differential care are also the population with disabilities, children, and migrant population.

	HUMAN RIGHTS RISK MANAGEMENT CYCLE GUIDE		
	Corporate Responsibility General Counsel and Secretary to the CEO		
	Code GEE-G-042I	Prepared ON 26/01/2022	Version: 1

groups¹⁰ can be vulnerable, and it is therefore necessary to determine whether they can be affected in a special way, due to their condition, by the operations or commercial relationships.

2. Planning

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:

2.1. Internal capabilities assessment

The capabilities to identify, evaluate, mitigate, and repair the possible impacts on human rights that may originate from direct or indirect operations must be evaluated, with the purpose of advancing in the delimitation of the aspects mentioned below.

2.1.1. Party responsible

There must be a team or an officer from each area responsible for advancing and/or coordinating the identification of HHRR risks for Ecopetrol's operations and for establishing the corresponding prevention and mitigation measures, together with other required areas. They shall report on the status of the risks and the effectiveness of the controls to the corresponding officer according to the information indicated in Table 5. Person Responsible for management in accordance with the risk assessment.

2.2. Temporality

Without prejudice to the technical stages of each project, system, or process, periodic activities shall be conducted to identify and update HHRR risks before, during, and at the end thereof, so as to ensure comprehensive management of the risks that can be materialized. In any of the events, risk identification shall be conducted at least once a year.


2.3. 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.

3. Identification

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

¹⁰ Example: women, landless people, migrant workers, nomadic populations, indigenous communities, people with disabilities, displaced populations, refugees, LGBTIQI people, children and adolescents, human rights advocates, and people living with HIV/AIDS. Taken from: IPIECA, *Human Rights due diligence guidelines* (May 2021), P. 13.

	HUMAN RIGHTS RISK MANAGEMENT CYCLE GUIDE		
	Corporate Responsibility General Counsel and Secretary to the CEO		
	Code GEE-G-042I	Prepared ON 26/01/2022	Version: 1

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.

As a starting point, in relation to the external information, the following relevant information should be available:


- a. 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)
 - iii. Institutional capacity (e.g., institutional presence at the local and national level)
- b. Process characterization (if applicable to the analysis)
 - i. People responsible for the process
 - ii. Underlying information
 - iii. Inputs and outputs
 - iv. Stakeholders, beneficiaries, etc.
- c. Identification of the relevant stakeholders (communities in the area, social organizations, international organizations in the area, entity representatives, etc.).

Given that one of the inputs in this type of analysis are the perceptions, expectations, or concerns of rights holders, it is important to identify the stakeholders and vulnerable groups for whom all possible human rights impairments and differentiated treatment actions should be determined, considering their situation.

According to international HHRR standards, it is important to consider that this risk identification should not only consider the risks that can be generated directly by company operations, but also those in which its activities contribute to exacerbating the risk or those to which it is associated with. The foregoing, to establish adequate prevention or mitigation measures adjusted to the possibilities of the company. For this reason, it is important to understand the causes of some HHRR risks, as well as the competent institutions that can assist in risk management.

- d. Previous activities

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.

	HUMAN RIGHTS RISK MANAGEMENT CYCLE GUIDE		
	Corporate Responsibility General Counsel and Secretary to the CEO		
	Code GEE-G-042I	Prepared ON 26/01/2022	Version: 1

3.1. Methodologies for identification

The information collected by the responsible team or officer will be useful to apply the different methodologies for the identification of HHRR risks, as specified in the Integrated Risk Management Guide.

Given the nature of the risks to be identified, brainstorming exercises should be conducted with the areas responsible for managing context (community relations, ethnic populations, physical security), environment (environmental impacts, climate change, water management), supply (working conditions, HSE; real estate management), human talent (diversity and inclusion, labor practices, union affairs), and ethics related issues.¹¹

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 types¹² identified regarding human rights issues, as well as consultations with experts and external sources, are also useful for this exercise.

4. Evaluation

In evaluating HHRR risks, it is necessary to consider the variables of SEVERITY and PROBABILITY.

4.1. Severity:

Refers to the seriousness of the consequences that may arise in the event of a human rights risk. In the UNGP, severity is defined in terms of scale, scope, and irremediable nature.

4.1.1. Scale:

This attribute determines the degree of violation that could occur or that has occurred on a right and how it affects the dignity of the individual and his/her ability to exercise other rights. It addresses the seriousness of the effect by enjoying one or more human rights.

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.


4.1.2. Scope

Refers to the number of people whose rights are affected or may be affected. To determine the scope, it is useful to consider criteria such as the duration of the impact (short or long term, permanent); the frequency of the impact (constant, occasional, eventual); the number of people affected (particular number of people or groups of people affected); geographical scope of the impact (local, regional, international)¹³.

¹¹ The subject areas mentioned here are merely illustrative.

¹² Annex GEE-G-029 Ecopetrol Group's Integrated Risk Management Guide. P. 8.

¹³ IPIECA, *Human Rights Due Diligence Guide*, p. 21.

	HUMAN RIGHTS RISK MANAGEMENT CYCLE GUIDE		
	Corporate Responsibility General Counsel and Secretary to the CEO		
	Code GEE-G-042I	Prepared ON 26/01/2022	Version: 1

4.1.3. Irremediable nature:

This attribute considers the limitation of the ability to return the affected person(s) to a situation equivalent to the one they were in before experiencing the negative consequences.

In this sense, one of the key questions to be answered is whether, once the risk has occurred and the impact has been generated, it is possible to restore the rights holders to the same state they were in before the impact. Severity can be assessed at the corporate or project level, as part of an impact assessment, or in response to an incident or emergency.


For risk assessment purposes, the following assessment criteria table should be used¹⁴:

Table 1. Assessment criteria

Criteria	Assessment		
	1	2	3
Scale			
Level of impact on the rights of the right holders.	Minor impact to human rights (due to its remediable nature)	Potential and/or moderate impact on the rights of holders, that Ecopetrol must pay special consideration to according to its Guide on Human Rights and Business ¹⁵ .	Imminent impact on one or multiple rights that Ecopetrol must pay special consideration to according to its Guide on Human Rights and Business.
Level of involvement of the company	The rights are affected by the context in which operations take place.	The effects are generated as a direct or indirect consequence of the business operation and the context.	The effects are generated mainly due to business activities and operations.
Effects on the rights of vulnerable populations	No effects on the rights of vulnerable populations (women, children, indigenous and afro-descendant populations, etc.) have been identified.	There are real and potential effects on the rights of vulnerable populations (women, children, indigenous and afro-descendant populations, etc.)	There are real and potentially serious and irremediable effects on the rights of vulnerable populations (women, children, indigenous and afro-descendant populations, etc.).
Scope			
Number of affected people	It affects a limited and reduced number of people with respect to the total population in the area of influence.	A moderate number of people is affected with respect to the total population in the area of influence.	The entire population of the area of influence is affected.
Number of people whose rights are affected that belong to a vulnerable population	No vulnerable people or groups affected.	The affected people include vulnerable group members.	It mainly affects vulnerable groups.

¹⁴ The assessment table was prepared based on the assessment table used by Fundación Ideas para la Paz in the risk analyses conducted for some Ecopetrol operations, as well as other company inputs.

¹⁵ List of human rights that Ecopetrol has declared to pay special consideration to, within its management framework: the right to life, the right to humane treatment, the right to personal freedom, the freedom of union association and collective bargaining, the right to decent, favorable, and adequate conditions, preventing forced and child labor, the right to health and safety at work, children's rights, the right to equality and non-discrimination, the right to freedom of expression, the right to information, the right to the privacy and protection of personal data, the right to the participation of ethnic groups through prior consultation, and collective and environmental rights.

	HUMAN RIGHTS RISK MANAGEMENT CYCLE GUIDE		
	Corporate Responsibility General Counsel and Secretary to the CEO		
	Code GEE-G-042I	Prepared ON 26/01/2022	Version: 1

Irremediable nature			
Prevention, mitigation, and remediation actions	Risk management requires the adoption of preventive measures.	Risk management requires the adoption of mitigation measures.	Risk/impact management requires the adoption of remediation or reparation measures.
Level of restoration of the right when implementing remediation measures	The measures adopted to restore the affected right(s) return the situation as it was prior to the impact.	The measures adopted to restore the affected right(s) partially return the situation as it was prior to the impact.	The measures adopted to restore the affected right(s) cannot return the situation as it was prior to the impact.

Table 2. Severity Scale

VERY HIGH	18 - 21
HIGH	14 - 17
MEDIUM	10 - 13
LOW	0 - 9

Once the severity of the risk has been assessed, whose maximum value will be 21 and lowest value 0, the probability must be assessed.

4.2. Probability

This criterion will consider the frequency of the risk event in the past.

Table 3. Probability scale

Frequent	It has happened more than twice in the last year
Probable	It has happened in the last five years
Rarely	It has happened in the last ten years
Unlikely	It has never happened


Table 4. Human Rights Risk Assessment Scale

PROBABILITY	LOW	MEDIUM	HIGH	VERY HIGH
Frequent	2	2	3	4
Probable	1	2	3	4
Rarely	1	1	2	3
Unlikely	1	1	2	3

The cases appraised as 3 or 4 must always be brought to the attention of Corporate Responsibility (GRT) under the General Counsel (SEG), or of the area responsible for HHRR in each of the companies of Ecopetrol Group, for monitoring purposes. This does not replace follow-up actions to be conducted by each officer or team designated to the management thereof.

Table 5. Person responsible for management in accordance to the risk assessment

RISK ASSESSMENT	PERSON RESPONSABLE
4	The Vice President or General Manager approves the risk analysis and the actions to be taken.

	HUMAN RIGHTS RISK MANAGEMENT CYCLE GUIDE		
	Corporate Responsibility General Counsel and Secretary to the CEO		
	Code GEE-G-042I	Prepared ON 26/01/2022	Version: 1

3	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.
2	Coordinators, the project leader, the plant shutdown leader, or the supervisor approve risk analysis and actions to be taken.
1	The controls are applied directly by the officer in charge, according to their responsibilities, and reports to the higher level.

5. Treatment

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.

5.1. Prioritization

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.


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.

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		
	Corporate Responsibility General Counsel and Secretary to the CEO		
	Code GEE-G-042I	Prepared ON 26/01/2022	Version: 1

In this sense, risk treatment plans must contain information related to:

- The rationale for selecting treatment options and expected benefits
- Positions or persons responsible for execution and follow-up
- Proposed actions within the treatment plan
- Necessary resources
- Performance or compliance measures
- Restrictions
- Reports and required follow-ups
- Dates of execution of the actions

6. Monitoring

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, as defined in section 7.

7. Recording, reporting, and responsibilities

7.1. Recording and reporting


The results of each phase of the risk management cycle must be documented and reported by the areas using the mechanisms established for HHRR risks, namely, the HHRR operational risk matrix available in *sharepoint*.¹⁶

The record and report must contain the following information:

- Description of the identified risk and its corresponding assessment.
- The activities of each stage of the risk management cycle and their results.
- Risk information for decision-making in each of Ecopetrol Group's company.

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 and the parties responsible for the analyzed system, process, project, or operation, and their corresponding counterparts in the other companies of Ecopetrol Group. This should be considered in terms of HHRR due diligence, in accordance to senior management's responsibilities, as well as those of the Board of Directors and its Corporate Governance and Sustainability Committee, and the Audit and Risk Committee, as described in section 7.2. These

¹⁶ The *sharepoint* site is called the **Human Rights Operational Risk Matrix**.

	HUMAN RIGHTS RISK MANAGEMENT CYCLE GUIDE		
	Corporate Responsibility General Counsel and Secretary to the CEO		
	Code GEE-G-042I	Prepared ON 26/01/2022	Version: 1

reports must include the analysis of the information relevant to the objectives of the organization, as well as the necessary elements for decision-making.

Considering that the risks identified herein are operational in nature, the Vice Presidency of Compliance's Risk Management must be notified of the residual risks outside the acceptance zone, the materialization of risks, and other aspects requested specifically.

In the case of each company of Ecopetrol Group, the risk management information required by the Corporate Risk Management will be reported in compliance with the times and means established for this purpose.

7.2. Roles and responsibilities

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.


All parties responsible for managing HHRR risks within the organization must apply the provisions set forth in this document, under the principles, framework, and risk management process determined by the Integrated Risk Management System.

Considering that Ecopetrol Group has committed to respecting human rights, that its workers have committed to acting in coherence therewith, and that HHRR risks could arise in any of the operations conducted by Ecopetrol and its Group, it is the responsibility of all employees in the organization to be aware of the HHRR risks that rights holders are exposed to, due to the business activities conducted and the processes in which they participate, in order to manage them appropriately.

The organizational structure of each company must clearly consider the roles and responsibilities for correct human rights risk management.

In the case of Ecopetrol S.A., the following roles and responsibilities are established:

AT ECOPETROL	RESPONSIBILITIES
<ul style="list-style-type: none"> • Board of Directors • Audit and Risk Committee • Presidency 	<p>Communicate the commitment to respect human rights by means of the following actions:</p> <ul style="list-style-type: none"> • 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.
Corporate Governance and Sustainability Committee of the Board of Directors	Review and follow up HHRR risk management, at their strategic and process level.
Risk Assurance and	Oversee the guidelines defined for risk management processes,

	HUMAN RIGHTS RISK MANAGEMENT CYCLE GUIDE		
	Corporate Responsibility General Counsel and Secretary to the CEO		
	Code GEE-G-042I	Prepared ON 26/01/2022	Version: 1

Internal Control Corporate Management	procedures, and/or activities at the strategic, tactical, and operational levels to ensure that they align with the definitions established in the Integral Risk Management System.
Corporate Responsibility	<ul style="list-style-type: none"> Oversee the implementation of the HHRR risk management methodology described in this document. Provide the necessary resources to apply the methodology for the identification, assessment, and treatment of HHRR risks. Review and follow-up on risk management measures. Design and supervise the implementation of the Human Rights Risk Management cycle for Ecopetrol Group. Define HHRR risk management cycle guidelines and update them accordingly, in compliance with national and international standards. Continuously monitor the implementation of the HHRR risk management cycle.
Risk management areas	Carry out the identification, assessment, treatment, and reporting related actions described in this document.

LIST OF VERSIONS

Previous Document			
Version	Date dd/mm/yyyy	Document Code and Title	Changes
New Document			
Version	Date dd/mm/yyyy	Changes	
1	26/01/2022	Drafting of the Human Rights Risk Management Cycle Guide.	

For more information contact:

Author(s): Mónica Andrea Tangarife Pedraza

Telephone: 2341051

Mailbox: monica.tangarife@ecopetrol.com.co

Unit: Corporate Responsibility

Electronically reviewed by:	Electronically approved by:
Carolina Ocampo-Maya Corporate Responsibility Manager Citizenship Card No. 52.800.253 General Counsel and Secretary to the CEO	Mónica Jiménez González General Counsel Citizenship Card No. 52.411.766 General Counsel and Secretary to the CEO
<p><i>Document signed electronically, in accordance with the provisions of Decree 2364 of 2012, which regulates Article 7 of Law 527 of 1999 on electronic signatures and issues other provisions.</i></p> <p><i>To verify compliance with this mechanism, the system generates an electronic report that shows the traceability of the actions reviewed and approved by the responsible parties. If you need to verify this information, request the report from the Service Desk.</i></p>	