



# THIRD PARTY GUIDELINES FOR ECOPETROL USA, INC.'S BUSINESS PARTNERS

## Statement

Ecopetrol USA Inc. and its affiliates do not, under any circumstances, participate directly or indirectly in the activities described below; as such, funds or capital associated with Joint Venture agreements are prohibited to be used in any fashion outside of the terms of the agreement.

## Objective of the Guidelines

In accordance with the Ecopetrol USA, Inc.'s Code of Ethics and Conduct, practices of political contributions, lobbying and facilitation payments are prohibited. Under U.S. law, these practices are permitted under specific circumstances.

These guidelines serve as an overview of Ecopetrol USA Inc.'s position regarding these practices and their conflict with our Code of Ethics and Conduct.

## Actions of Joint Venture Partners

Joint Ventures and Operating partners for Ecopetrol USA Inc., Ecopetrol America LLC and/or Ecopetrol Permian LLC are not prohibited under any contractual terms or legal consideration to continue with practices such as, lobbying, political contributions, and facilitation payments.

## Agent of Ecopetrol

Joint Ventures and Operating partners for Ecopetrol USA Inc., Ecopetrol America LLC and/or Ecopetrol Permian LLC shall not, under any circumstances, act as an Agent or Representative for

any of our companies with regards to conducting practices such as: lobbying, political contributions, and facilitations payments.

## Contractual Terms

Joint Ventures and Operating partners shall not use funds provided by Ecopetrol USA Inc. or its affiliates under the terms of the Joint Venture contract for the purpose of the practice such as: lobbying, political contributions, and facilitation payments. Any such misuse of funds shall be considered a breach of contract and subject to termination.

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For any questions or concerns regarding these guidelines please contact:

By phone, please call: 1-855-216-6142

Website: <https://secure.ethicspoint.com/domain/media/en/gui/41224/index.html>