



CODE OF ETHICS AND CONDUCT

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Code of Ethics and Conduct, a Fundamental Pillar of Company Sustainability

Ecopetrol USA and its subsidiaries, Ecopetrol Permian, Ecopetrol America, and Ecopetrol US Trading, represent one of the most important bastions of the Ecopetrol Business Group through its commitment to social, environmental, financial, and corporate responsibility in adherence with the principles of this Code of Ethics and Conduct, a fundamental pillar of company sustainability.

Ecopetrol USA recognizes, accepts, and promotes the application of this instrument as our guidance for proper behavior which is essential to achieving our higher purpose of acting with integrity, respect, responsibility, and commitment to life.

In accordance with our cultural statement, we reject any conduct that is inconsistent with the aforementioned postulates, and with this framework, we set for ourselves the ultimate goal of being Always Ethical.

We reaffirm our unwavering commitment to building a company that is recognized worldwide for its exceptional compliance practices, which is why we reiterate the duty of all recipients of this Code to learn, implement, and spread the values contained herein.

Message from the Board of Directors of Ecopetrol USA

The Board of Directors of Ecopetrol USA, its Executive Committee and all company employees, declare that there is a higher purpose that inspires us, which is “To be Energy that Transforms”; we also declare that our culture defines us, and together we live by these principles.

In order to uphold our declaration and live our transformative culture, we must always act in accordance with the guidelines set forth in this Code and act with integrity, with commitment to life, in a responsible manner, and with respect.

With the aim of strengthening our beliefs in the values that unite us, we adopt Ecopetrol Group’s Code of Ethics and Conduct, and reject wrongful conduct such as sexual harassment and discrimination in any of its forms. In this context, reference is made to our policy of inclusion and diversity, which is a fundamental tenet that promotes tolerance and respect of differences and encourages a healthy coexistence.

Furthermore, we reaffirm the express prohibition against facilitation payments, corporate political contributions and donations, lobbying services, and the diversion of monies from social investment activities or sponsorships towards political activities or activities outside the purposes established by the company. We promote free and healthy competition, and we emphatically reject any unfair act that may affect the interests of the company, its shareholders or third parties.

Ecopetrol reiterates its commitment to fulfill the mandates of this Code of Ethics and Conduct and calls upon the recipients of this Code to model your conduct under the provisions therein. Remember that ethics is an essential part of our identity.

What is the Code of Ethics and Conduct?

The Code is a set of rules that define the standard of conduct expected by the organization and that guide the actions of Ecopetrol USA, of its subsidiary companies, and of all the recipients of the Code, pursuant to the ethical principles of integrity, responsibility, respect and commitment to life.

Having this instrument constitutes a business purpose and a responsible personal commitment, thus contributing to a prestigious image, with a culture based on principles of exceptional conduct.

To whom does this Code apply?

This Code applies to the members of the Board of Directors, employees of Ecopetrol USA, Inc. and its subsidiaries (collectively "Ecopetrol USA or Ecopetrol USA Companies"), all individuals or legal entities with whom the Ecopetrol Companies maintains a relationship, including, but not limited to, beneficiaries, shareholders, contractors, suppliers, agents, partners, customers, allies, co-venturers, and suppliers, in addition to the personnel and legal entities that the contractors engage for the execution of the agreed activities.

Therefore, recipients of this Code are required to understand and to acknowledge this Code, and to apply these defined rules to their actions.

The Ecopetrol USA Companies shall adopt the rules set out in this Code and ensure their dissemination and application.

** Any reference made herein to Ecopetrol, company, business, or similar term, is a reference to Ecopetrol USA as well as to the affiliates and subsidiaries that make up the Ecopetrol USA Companies.*

This Code is not intended to resolve or define every action, but it is intended as a guide for our actions and responsible decision making.

Compliance
Ecopetrol USA Inc

Recipients of our Code of Ethics and Conduct: Before undertaking any activity or making any decision, we must review the principles and behaviors set out in these rules. If the activity or decision does not match the ethical guidelines established herein, or in any way deviates from the guidelines, you must abstain from taking such decision, and seek other options in accordance with our corporate principles.

What are the responsibilities of the recipients?

- To know and implement the information contained in the Code and promote the same among other recipients.
- To subscribe documents, certifications, or statements stating the recipient's knowledge and commitment to the Code and certifying that its provisions have not been infringed.
- To act in accordance with the principles of integrity, responsibility, respect, and commitment to life.
- To accept the regulations that govern our activities as well as the regulations related to the prevention of money laundering, terrorist financing, fraud, bribery and corruption, and other regulations relevant to the ethical and compliance risks set forth in this Code.
- To raise any queries, concerns, dilemmas, or complaints related to the Code of Ethics and Conduct.
- To cooperate with internal or external investigations aimed at verifying possible violations of this Code.

What are the responsibilities of the leaders?

- To lead by example in accordance with the Code principles.
- To expressly communicate to their teams our obligation to abide by the ethical principles and regulations set out by Ecopetrol for the performance of their duties.
- To conduct periodic status meetings with members of their teams to encourage implementation of the Code within their department's activities.
- To monitor, manage, and verify the application of the Code principles and company internal controls, which are based on the need to mitigate business risks.
- To abstain from retaliating against those who file complaints for alleged violations of the Code.
- To have "zero tolerance" for behaviors that breach the principles or applicable regulations.
- To allow and promote the reporting of queries, dilemmas, and complaints.
- To disseminate and ensure the application of internal regulations regarding compliance risks.

Ethical principles of Ecopetrol USA Companies

The following principles are rules of the organization that constitute a source of responsibility and guide for the expected conduct of the recipients of this Code:

INTEGRITY

It is behavior that shows that we are moral people, who are loyal, fair, objective, honest and transparent to the company and to society. A moral person acts in accordance with the aforementioned characteristics, the applicable internal and external regulations, and the principles and rules adopted by the organization to prevent violation of the ethical standards and expectations referred to in this Code. Acting in accordance with this conduct allows us to state that acts related to money laundering, terrorist financing, fraud, bribery, and corruption (violations of the FCPA Law, gifts, entertainment, and hospitality), conflicts of interest and non-ethical conducts are not tolerated.

RESPONSIBILITY

It is our moral obligation to make the best effort to achieve business objectives and to ensure the efficient management of resources. Based on this principle, we are required to take all necessary steps to fulfill corporate activities and goals, to comply with Applicable Law, and internal regulations, and to adopt the Internal Control System. Under this principle, we accept the consequences of our decisions, actions, or inactions.

RESPECT

It is the ability to accept and recognize the differences among us.

Based on this principle, we protect fundamental human rights, and encourage the recognition of others without distinction of gender, orientation, race, nationality or family origin, language, religion, political or philosophical opinion, disability, economic condition, physiognomy, genetic characteristics, educational level, socio-cultural characteristic, difference of thought, expression, or any other situation that goes against the diversity and inclusion policy adopted by Ecopetrol.

By virtue of this principle, we act in a cordial manner without discriminating, mistreating, or attacking others, nor speaking ill of others, thereby protecting the reputation of our people and our Company.

COMMITMENT TO LIFE

It is the practice of self-care during work or personal time, through the application of hygiene, safety and environmental rules set out by Ecopetrol, as a mechanism for the protection of life, health, and the environment.

Compliance with the law and internal regulations

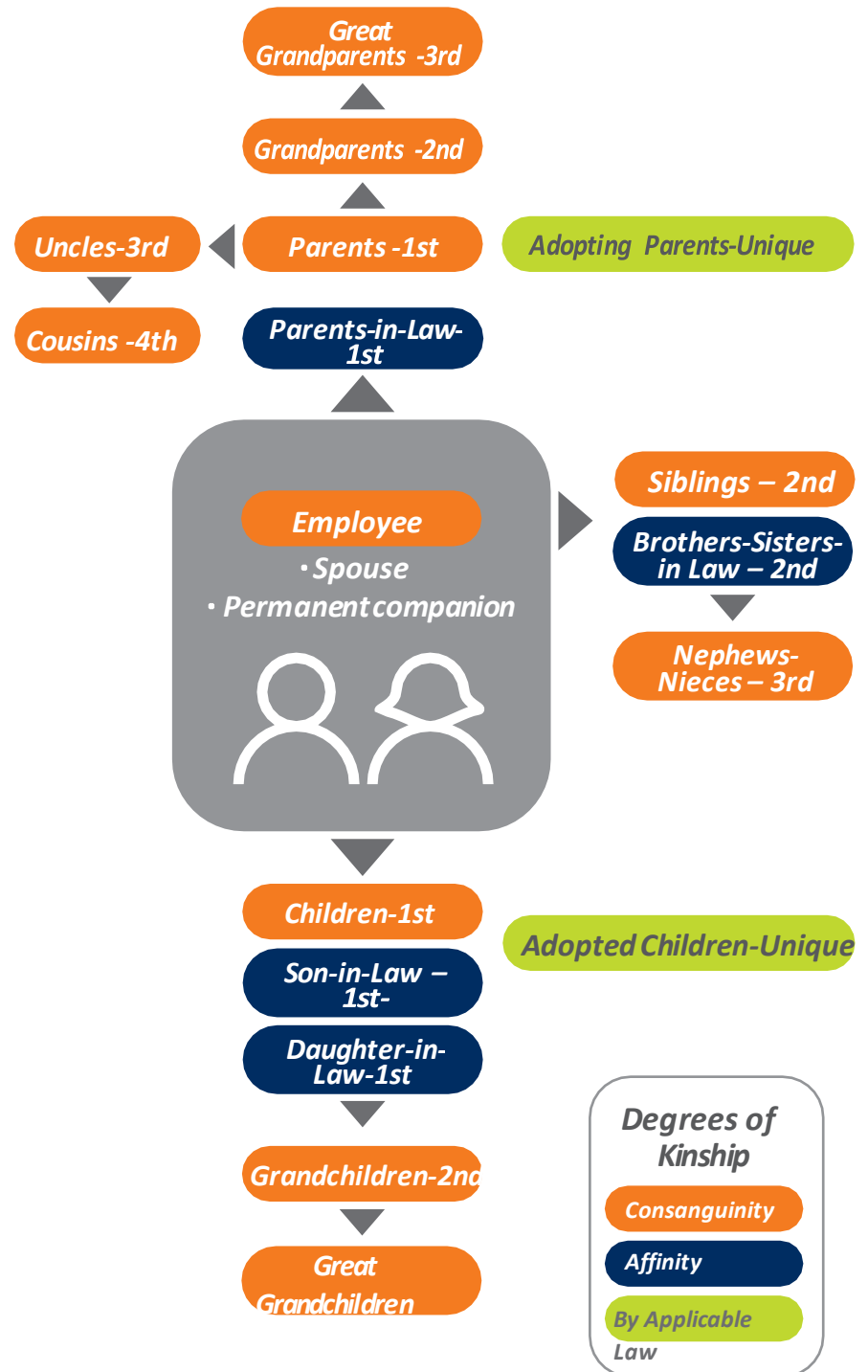
Ecopetrol and its Business Group comply with the provisions that are applicable to it, contained in the Applicable Law, and its internal regulations and the regulations in force in the jurisdictions in which it carries out its business. Applicable Law and regulations include, without limitation, laws, decrees, procedures, manuals, guides, instructions, other formal guidelines, internal control provisions (against money laundering, terrorist financing, fraud, bribery, and corruption) and any other provisions intended to mitigate compliance risks.

Conflict of Interest

Corresponds to the involvement of public servants in matters in which they have a particular and direct interest in its regulation, management, control or decision, or in matters that could be related to their spouse, permanent companion, or one of their relatives within the fourth degree of consanguinity, second degree of affinity or first degree of kinship by Applicable Law, in accordance with the provisions of the Applicable Law and the Employee Handbook.

Ethical conflict

Per internal regulations, Ecopetrol considers an ethical conflict that violates the principle of integrity to be any act or circumstance that may imply a conflict of interest or that impairs objectivity, independence, or impartiality, because decision-making may prevail for self-interest or third-party benefit to the detriment of the interests of the Company.



What to do if, as a public servant, I have a conflict of interest (pursuant to the terms of Applicable Law or the Employee Handbook) or that which modifies or repeals them. Or if, as a recipient of this Code, I am involved in circumstances that may affect the objectivity, independence, or impartiality in the management of matters in which I participate (ethical conflict)?

In both cases, you must report such situation to your immediate supervisor in writing and send a copy to the Compliance Officer of the Ecopetrol USA Companies, and withdraw from the respective procedure or management, in accordance with internal procedures. If you have a doubt about whether a situation rises to the level of the aforementioned cases, you should utilize the ethics hotline.

We should keep in mind that there is a regime of inabilities, incompatibilities, and prohibitions applicable to current or former public servants and/or those interested in contracting with public entities, which contains a few limitations on hiring such persons. Ignoring these prohibitions constitutes a violation of this Code.

Prohibition against bribery and other forms of corruption

Bribery is an offer, proposal, promise, delivery, acceptance or request of an undue advantage of any value, whether in the form of money or in-kind (products or services, an offer or promise to pay something in the future), directly or indirectly, in exchange for (i) a personal benefit, a third-party benefit or a company benefit, or (ii) for a person's action or inaction.

Bribery is not related only to money!

Do not bribe or be bribed with travel expenses, gifts, entertainment, hospitality or benefits for family members, services, courtesy favors, scholarships, internships and sponsorships, employment, improper payments disguised as contributions, among others (especially if they are for or come from public servants).

The Company does not tolerate facilitation payments, political contributions and donations that do not comply with Applicable Law and this Code, activities and payments for lobbying services, and the diversion of money from social investment activities or sponsorships towards political activities or other than the purposes established by the Company. Remember that violation of these prohibitions could lead to the imposition of sanctions in accordance with Applicable Law and our internal regulations.

The employees of the Ecopetrol USA Companies may only interact with the public sector for the development and execution of the Company's own activities, in all cases, in accordance with the provisions that govern the matter for that purpose. In this relationship, no activities and payments for lobbying services, any act of corruption, bribery, provision or receipt of hospitality, and any event that may affect or call into question transparency will be tolerated.

Applicable Law means all current laws, ordinances, constitutions, regulations, statutes, treaties, rules, codes, licenses, certificates, permits, principles of common law, ordinances and orders adopted, enacted, implemented, promulgated, issued, entered, or deemed applicable by or under the authority of any governmental body having jurisdiction in the U.S.A. over a specified Person or any of such Person's properties or assets.

It should be noted that the Foreign Corrupt Practices Act - FCPA, to which we are subject as U.S. companies establishes that it is a crime to pay or offer anything of value, directly or indirectly, to a foreign government official or public servant, to obtain or retain business or to be given an improper business advantage, under penalty of pertinent sanctions by the U.S. Department of Justice - DOJ and the U.S. Securities and Exchange Commission - SEC. These same prohibitions, among others, are contained in the Ecopetrol USA Companies' Anti-corruption Policy, and are investigated by the Compliance Department.

Did you know that the FCPA, in addition to containing prohibitions of transnational bribery, provides for compliance with internal controls, especially in terms of adequate bookkeeping and accounting of all monetary transactions, under penalty of sanction by the U.S. Securities Exchange Commission - SEC?

WHAT SHOULD YOU DO?

To avoid the risks of violating the FCPA, you must ensure: **(1)** That you have complied with the due diligence processes; **(2)** That there is a signed contract, which expressly describes the services rendered or goods acquired, the obligations, the amount, form of payment and accounts for which such payment may be received; **(3)** That the agreement or contractual document contains ethics and compliance clauses; **(4)** That the third party, its workers and/or subcontractors understand and commit to comply with the applicable local and foreign anti-bribery and anti-corruption laws, as well as with the guidelines and principles of this Code of Ethics and Conduct; **(5)** That every invoice clearly reflects the services rendered or goods acquired and that the approval and payment thereof

comply with the internal controls of Ecopetrol.

Integrity of accounting

Ecopetrol has an Internal Control System that, regarding accounting matters, ensures that the assets of the company are managed and administered in due form with reasonable detail, and reflect the transactions and disposal of company assets in an accurate manner.

Each worker at Ecopetrol is part of the Internal Control System; therefore, it is critical that you comply strictly with the controls for which you are accountable, in such manner that the accuracy of the financial statements can be certified against auditors and government authorities in U.S.A. and abroad.

All financial information that must be reported internally or externally, must be correct and certified for completeness and accuracy; therefore, any errors should be reported immediately.

Accounting records will be archived in a safe, reliable, and systematic way.

WHAT SHOULD YOU DO?

All transactions must be performed according to pertinent procedures and delegation of authority and must be registered accurately and correctly in the books. Specifically, as an employee of Ecopetrol, you must ensure that the accounting information is based on the following guidelines:

- Comply with internal controls.
- Possess complete and detailed information of the transaction.
- The transaction is authorized in due form and accurately recorded in the respective books or systems.
- The access to and management of Ecopetrol resources, assets and records are limited to authorized personnel.
- The registered assets are compared with the frequency required in the internal regulations, to remedy the respective discrepancies.

Warning signs

- Difficulty in obtaining or verifying information from a counterpart.
- Inconsistency between the information provided by the counterpart and information from other sources.
- Counterpart activity that has no obvious commercial justification or seems strange in a normal business context.
- Counterpart presence in a country classified as non-cooperating in the fight against money laundering and terrorist financing.
- Transactions that seem to be structured to evade requirements.

We act against money laundering and terrorist financing (AML/TF)

These are activities that violate the principles of integrity and accountability of the Code of Ethics and Conduct as they are means that facilitate transactions that support the concealment or use of monies of criminal or terrorist origin. Therefore, it is prohibited to accept funds or make transactions knowingly or with the suspicion that they come from an illegal activity.

WHAT IS MONEY LAUNDERING?

It is the process by which the revenues derived from illegal activities are moved through legitimate businesses or through the global banking system to eliminate or hide their source. It includes activities to acquire, protect, invest, transport, transform, store, or administer goods of illicit origin.

It is important to bear in mind that if Ecopetrol or its employees participate in a transaction with a third party involved in an improper payment, they may be held liable even if they are not the direct authorizers of the improper payment.

WHAT IS TERRORIST FINANCING?

It means actions of collection, provision, delivery, receipt, administration, contribution, or custody of funds or assets or resources, whose purpose is the promotion, organization, maintenance, financing or support of unlawful groups, terrorists, or organized crime. For the terrorist financing to be configured, it is not required that the facilitation resources have been obtained illegally.

WHAT SHOULD YOU DO?

It is necessary to carefully evaluate every financial transaction in which Ecopetrol participates, and to perform due diligence on any counterpart to ensure that that such counterpart is not included in restrictive lists and that there is no other warning signal.

Ecopetrol must comply with the sanctions and economic restrictions imposed by the Office of Foreign Assets Control (OFAC) of the U.S. Treasury Department, which contain prohibitions or limitations on business and transactions with certain countries, including individuals and entities. A thorough OFAC analysis is essential before subscribing to any agreement.

Therefore, you should consult the EUSA Anti Money Laundering and Financing Terrorism Policy and internal regulations regarding due diligence.

Gifts, entertainment, and hospitality

Ecopetrol USA Companies' employees are not authorized to give, offer, demand, request or accept gifts, courtesies, meals, trips or other benefits outside the parameters defined in its internal regulations: EUSA Employee Handbook and EUSA Anticorruption Policy and Procedure. This prohibition extends to Ecopetrol USA Companies' Covered Person (as this term is defined in the FCPA) and to employees' immediate family members (i.e., spouses, partners, children, and parents). Therefore, it is mandatory to know and apply the pertinent provisions.

Ecopetrol recognizes that there may be situations in which it is culturally appropriate to accept or give gifts or other forms of entertainment to a client or provider. However, this practice is considered high risk pursuant to anti-corruption laws; therefore, the guidelines set forth in the internal regulations must be strictly followed. In general, in every case, as regards the receiving or offering of gifts, entertainment and hospitality, the following aspects should be analyzed:

- Is it directly related to a promotional activity and is it moderate?

- Is it reasonable, consistent with what is customary, appropriate in nature and according to the occasion on which it is offered, and to the position and circumstances of the recipient in the specific context (such as gifts of a promotional nature that are identified with the name of a brand, service, or product of an organization)?
- Is it allowed by Applicable Law and that of each country where the activity occurs, and by internal regulations?
- Has it been received or granted in a transparent manner, with no intention to hide it and in accordance with usual business practices?
- Is there any reasonable chance of its being considered in some way or having the appearance of a bribe, a facilitation payment, or an improper payment?
- Has it been supported with accurate and adequate documentation?
- Was it registered and/or correctly reported in the systems or information formats that are established according to internal procedures?

In any event, it is prohibited that the reception acceptance or granting of gifts, entertainment and hospitality or other benefits is prohibited when such benefits are:

- Be intended to influence any type of decision or to obtain an inappropriate advantage.
- Generate a sense of obligation or commitment for the receiver.

- Luxurious, excessive, or frequent.
- Offered or given to family members of an employee, contractor, partner, ally, customer, or supplier.
- Cash or a commercial instrument convertible into cash (titles, securities, gift cards, letters of credit, bills of exchange, etc.).
- Requested by an employee of Ecopetrol to direct a benefit or advantage or given to someone who offers a benefit or advantage to Ecopetrol.
- Requested or delivered to a worker of Ecopetrol in exchange for fulfilling or not fulfilling an obligation that legally or functionally is his responsibility.

If you are not sure about receiving gifts, entertainment, and hospitality, you should utilize the ethics hotline for guidance.

Protection and use of Ecopetrol USA Companies' resources

Ecopetrol prohibits the misuse of resources owned by the company, including physical assets, information, and intellectual property.

Inadequate practices may include:

- Personal and excessive use of information technology services, systems, and equipment.
- Personal use of equipment or office supplies.
- Disclosure of company information.
- Processing, use or improper obtaining of benefits.
- Theft of the above in any way.

- Inappropriate use of the goods or services delivered. Failure to protect the integrity of company equipment.
- Enter into contracts for goods or services that are not required.
- Payment of goods or services not received or that do not meet the technical specifications.
- Purchase or contract of services for amounts that do not match the actual and current market prices.

Information Management, security, and confidentiality

Ecopetrol recognizes the strategic value of information and establishes mechanisms that promote its proper treatment, as well as the conditions of ownership, responsibility, and protection. Therefore, the recipients of this Code have a duty to properly handle the information held by this company.

Ecopetrol makes appropriate use of personal and sensitive data, while protecting the information that it registers in its databases, in accordance with Applicable Law. Any collaborator who handles or acquires access to personal information must protect it and can only share it based on the applicable rules.

Laws governing the use of personally identifiable information can vary. If you are not sure or do not know the regulations, you should consult the Compliance Officer for guidance.

Every worker has the responsibility to protect the information and technological resources that Ecopetrol has provided (e-mail, internet access, computers, mobile devices, etc.), which are exclusively intended for the performance of their functions or tasks, and should not be used for any other purposes, in accordance with internal regulations. Remember your duty to protect the intellectual property rights of others. If you need to download software on your corporate computer, please discuss with IT beforehand.

Ecopetrol has specific guidelines for the protection and handling of confidential information such as:

- **Confidential information** must be treated according to the guidelines established in Applicable Law and internal regulations regarding its registration, reporting and retention -as applicable-.
- The information that contains professional, commercial, technical, administrative, technological, and asset location secrets, among others, should only be used for business purposes and by authorized persons according to their functions and responsibilities.

Use of confidential information for your own benefit or that of a third party, or for the purpose of causing any damage or harm to the company or its shareholders is prohibited.

- Confidential or reserved information may not be published, disclosed, or made known by any means, except to the extent legally compelled by a competent authority. The delivery of the same will be subject to internal procedure and will require prior authorization from the legal department.

- The reliability of the information disclosed to the market must be guaranteed, with the review and approval of the competent person in the organization.
- Confidentiality must be always preserved, even if the employment or contractual relationship with the company has ended.

Ecopetrol, as the owner of the information contained in the equipment, devices and servers that it assigns to its collaborators, can, through the control or compliance areas, ensure, access, capture, review, treat, transfer, use or monitor, at any time, the information that is created, generated, managed, guarded, sent, received or stored in said equipment, mobile devices and servers, for institutional purposes.

Ecopetrol has a cybersecurity management system.

For more details on the obligations of Ecopetrol collaborators, consult the manuals, procedures, guides, and instructions that refer to information security issues and proper handling of email and social networks, as well as other internal regulations related to the handling of information.

At Ecopetrol USA, personal data is treated according to the parameters and principles established in Applicable Law, the Employee Handbook and Records Manual, its regulatory standards and others that modify and/or complement them.

www.ecopetrol-usa.com

Remember that Ecopetrol USA has internal regulations that define procedures and guide how we must treat and secure information. Check these provisions and stay updated; if in doubt, remember to ask.

Prohibition of insider trading and use of inside information

Those who are users of, responsible for or have access to privileged, confidential and / or reserved information must:

- Strictly comply with the Applicable Laws and internal regulations regarding the trading of shares and the use of privileged information which is: (a) subject to confidentiality or restrictions, (b) has not yet been disclosed to the public, and (c) may influence the analysis of any diligent and prudent investor, when negotiating any commodity-related transaction.
- Refrain from using said privileged information of Ecopetrol USA Companies or Ecopetrol USA's parent companies, for its own benefit or that of a third party.
- Comply with the restriction periods for trading shares notified by Ecopetrol USA Companies and Ecopetrol USA's parent companies.

Social responsibility:
respect human rights
and reject
discrimination.

Ecopetrol USA rejects any form of discrimination.

The success of Ecopetrol USA is based on constructive, dynamic, and reliable relationships with its counterparts and stakeholders. These relationships grow and prosper through mutual

care, understanding and respect.

Likewise, Ecopetrol USA carries out actions of understanding and support for the development of the communities that are considered allies of management, recognizing the human rights of the stakeholders.

In particular, the principles of respect and commitment to life commit the company to guarantee the defense 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 Law and regulations regarding fair labor practices and human rights, including prohibition of forced or child labor.

These principles and regulations reflect the commitment to prevent and, when necessary, remedy the negative impacts generated by the operation on human rights. Similarly, they ensure the effective identification of risks associated with human rights in operations, with the purpose of continuously improving processes. To such end, we must undertake due diligence actions, get involved with our stakeholders, and communicate our expectations to our business partners.

ENVIRONMENTAL POLICY

Ecopetrol USA Companies are committed to the protection of the environment, to the efficient use of energy and natural resources to the implementation of actions aimed at reducing greenhouse gas emissions and managing waste, following environmental policies, standards, procedures, and Applicable Laws.

Likewise, the company ensures adequate comprehensive water management in operations, monitors continually the effects of climate change through the HSE management system; makes the timely report of related incidents and maintains clear guidelines on emergency protocols.

The company directs efforts to generate environmental awareness and to strengthen its relationship with stakeholders through continued communication in accordance with the environment and applicable regulations.

The company prioritizes safety at work and in the environment, to protect people, facilities, and areas where operations are performed. Therefore, it is imperative to stop any work considered unsafe or harmful, without fear of reprisal.

ANTITRUST AND ANTICOMPETITIVE PRACTICES

Ecopetrol USA rejects any practice that promotes monopolization and that limits or violates free competition; that puts at risk the interests of consumers and markets; that may undermine the reputation of the Company in its activities and business; that go against the legal and internal provisions in this matter, or that may be seen as collusive practices. In any case, the protection of copyright and intellectual property is promoted.

Report any event that infringes this Code!

If you are aware of a situation that involves a worker or recipient of this Code that you know or suspect may be a violation of this Code and, you are required to report the matter in the ethics hotline:

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

HOW SHOULD YOU REPORT?

Any complaint must be reported immediately, in good faith and in sufficient detail to allow the company to verify the report through investigation and provide an effective response. Therefore, when reporting, keep in mind the following:

- You can report the situation anonymously to the ethics hotline and the information will be treated confidentially up to the extent that, in the company sole discretion, it becomes necessary to be disclosed for legitimate reasons.
- The report must indicate the time, manner, and place of the events, the identification of the complainant, the material, elements, and evidence collected in the process are confidential, unless the matter should be transferred to the competent authorities for decision making, or if there is a requirement issued by a competent authority, or if it is necessary to reveal information to carry out a thorough verification.
- Be willing to cooperate with the management of reported issues, responding to requests for further information through contact provided by the complainant, and providing the required evidence.
- It is an obligation to respect the human dignity and the good name of the accused parties; therefore, no accusations should be made that are not true or are intended as revenge or retaliation. Reporting an issue knowing that one knows to be untrue constitutes a violation of integrity and responsibility principles. With respect to contractors, the false complaint constitutes a violation of this Code which can lead to contractual consequences.

- During a verification process, it is mandatory to always speak truthfully and without the intent of causing harm or affecting any person.

Ethical conduct

Include actions and behaviors that embody the ethical principles of the Ecopetrol USA Companies. This section describes expected conduct based on the principles of this Code.

INTEGRITY

I act with **integrity** when:

- I work with righteousness, loyalty, justice, honesty, and transparency.
- I act in a consistent manner, according to what I think, speak, and do.
- My decisions and actions are impartial and objective. I do not intend to seek privileges, or undue personal benefits, nor do I take actions based on favoritism, nepotism or clientelism.
- Neither my family, nor I, have private business relationships with Ecopetrol workers, suppliers, contractors, customers, co-workers, or the competition, from which it is possible to obtain any undue benefit thanks to the role, function, or activity that I perform for the company.
- I report conflicts of interest, inabilities and incompatibilities, and situations where I perceive a lack of objectivity, independence, or impartiality, as well as associated dilemmas, in accordance with internal procedures. I abstain from acting when a circumstance arises that could constitute a conflict of interest or ethical conflict, or which breaches the regulation of inabilities, incompatibilities, and prohibitions.
- I do not accept, request, offer, approve, or pay bribes. I do not ask for favors or benefits from Ecopetrol contractors, suppliers, clients, and workers.
- I do not make any deals or offer or receive gifts, entertainment or hospitality from stakeholders that may affect the reputation of Ecopetrol or that breach internal regulations.
- I do not use the assets, resources, supplies or material assigned to me for matters other than those inherent in my work or for my own benefit or that of a third party.
- Before managing, executing, authorizing, or consenting to a payment, I ensure the respective controls and fulfillment of the requirements, without performing actions tending to unduly favor a third party or to obtain an improper benefit. I do not present false and malicious reports intended to harm third parties.
- All the information and documentation processed has been verified and I have no knowledge that they correspond to false information.
- I always speak the truth, which is above all in every action and relationship.
- I lead by example.
- My actions adhere to the imperatives of common good above private interests.
- I do not tolerate activities that lead to compliance risks (fraud, bribery, corruption, money laundering, terrorism financing, violation of the FCPA), and I promote actions to encourage transparency.

RESPONSIBILITY

I act with **responsibility** when:

- I deliver quality work in a timely manner in response to all my assignments.
 - If something goes wrong, I do not blame others. I identify errors and causes, I take the corrective actions, and I communicate the lessons learned, always promoting continuous improvement.
 - I am responsible for my actions and omissions, as well as for knowledge of and compliance with local and international regulations and internal provisions applicable to the matters for which I am accountable.
 - I am accountable for any lack of due diligence and care in my actions, as well as for the management of matters or assigned functions due to any failure to understand and apply in-house guidelines, handbooks, procedures, guides, and instructions.
 - I perform my work efficiently and effectively.
 - I protect information, assets and resources that belong to Ecopetrol **USA Companies**. I make rational use of the elements assigned to me, guaranteeing their protection and I am accountable for any failure of these duties.
 - I honor my promises, duties, and commitments.
 - I am aware that all recipients of this Code are identified by our engagement with Ecopetrol USA Companies; therefore, I avoid any work or personal behavior that may impair the good name and reputation of the Company.
- I know and comply with the internal and external regulations applicable to my work or activity, the culture principles, and the agreed obligations, and I assure their enforcement.
 - I try to meet the required skills to perform the functions or activities assigned.
 - I do not breach the duties and prohibitions established in Applicable Law and this Code, the pertinent contracts, the legal framework, and any applicable internal provisions.
 - I am accountable for mitigating business and activity risks, abiding by the pertinent controls, and executing those that are my responsibility.
 - I am responsible for the strengthening and improvement of the Internal Control System.
 - I promote information security, thus preventing the leak of strategic confidential, reserved, or classified information, according to internal regulations, as well as the dissemination or conveyance of data that could give rise to an improper benefit.
 - I do not disclose by any means, whether electronic, printed, or audiovisual, any improper, illegal, pornographic, or racist information.
 - I preserve, protect, and use the resources assigned to me in a rational, austere and efficient manner.
 - I know that the assigned hardware is the property of Ecopetrol, as well as the information contained therein.
 - I share my knowledge and experience, I work as a team, and I am collaborative and creative, promoting optimal development of the functions and activities.

RESPECT

I act with **respect** when:

- I do not discriminate or harass my colleagues based on sex, orientation, race, national or family origin, language, gender, religion, political or philosophical opinion, disability, economic condition, physiognomy, genetic characteristics, educational level, socioeconomics, difference of thought, expression, way of being or any other situation that goes against the diversity and inclusion policy adopted by Ecopetrol USA Companies. I respect differences.
- I reject any act of sexual harassment at work.
- I neither discriminate nor harass my workmates based on sexual orientation, race, nationality or family origin, language, gender, religion, political or philosophical opinion, socioeconomics, physical or mental condition. I respect differences.
- I promote equality among my colleagues.
- I neither attack nor make fun of people with whom I interact, and I maintain courteous relations. I do not refer to other people using derogatory or offensive words.
- I avoid publishing by any means false or inaccurate information, or performing any act of disrespect or defamation that may affect the image of Ecopetrol, its employees, other people or companies who have a relationship with the company and the group, which may harm their reputation or investors' confidence.
- I accept differences of opinion and encourage the discussion of ideas that promote better practices to perform company activities.
- I treat everyone with respect regardless of their status or position in the company.
- I recognize that as a worker or party related to Ecopetrol USA, my behavior should be appropriate and respectful during work and in my engagement with society.
- I recognize and do not violate intellectual property and copyrights.
- I reject unfair competition and, therefore, I abstain from making judgments, disqualifying, or making negative comments that may affect other companies.
- By no means do I make or publish threats against the company or its workers.
- I maintain courteous, cordial relations with my colleagues, clients, suppliers and with all people at large.
- Neither my family, nor I, use my position as employee of Ecopetrol as a mechanism to demand preferences or special treatment, different than that conferred to other citizens, nor do we mistreat the people with whom we interact or from whom we receive the benefits of Ecopetrol.
- I respect the time of others, and arrive on time to appointments, interviews, and work meetings.
- I acknowledge and accept the habits, traditions, and customs of the communities with which I interact.
- I promote a cordial and positive environment, expressing my disagreement with responsibility and respect. I care about the improvement of interpersonal communication and working climate.

COMMITMENT TO LIFE

I act with **commitment to life** when:

- I respect and promote respect for human rights. I perform my tasks with self-care.
- I comply with and enforce HSE rules.
- I give priority to my health and safety and the health and safety of my collaborators.
- I protect the environment. Through my actions, I strive to preserve and improve the environment and the social milieu surrounding me.
- I report incidents related to compliance and non-compliance with internal HSE rules.
- I avoid violent acts in all areas, both in my work and personal life, to protect people's life, health, and well-being.
- The activities I perform for the benefit of the community are aligned with the guidelines for environmental management and the business strategy.
- I place garbage and recyclable materials in their respective containers.
- I respect and enforce internal security rules and the conditions or guidelines established in terms of access to, permanence, and exit from the company facilities.

At Ecopetrol USA we reject sexual harassment in the workplace

WHAT IS SEXUAL HARASSMENT?

It is unwanted behavior, of a sexual nature, in the workplace, which makes the person feel offended, humiliated, or intimidated.

HOW IS SEXUAL HARASSMENT MANIFESTED?

Through such behavior as the following:

- Work or personal pressure, coercion, or blackmail;
- Hostile work environment;
- Attitudes that can be physical such as touching, unnecessary closeness, forcing intimate actions, or giving non-consensual kisses, among others;
- Verbal behavior, in writing, through sexual comments, gestures with sexual connotations, inappropriate messages or notes, sharing pornographic material, etc.

WHAT SHOULD YOU DO IF YOU BECOME AWARE OF A SITUATION OF THIS NATURE?

- You must protect the identity of the victim if this is required.
- You must report the situation to the ethical hotline or recommend to the victim that they proceed to report the situation.
- If you are a leader, you must prevent the situation from recurring, taking the necessary administrative measures while the respective internal and external investigation is carried out.

IF YOU ARE THE VICTIM:

- Do not be afraid to report the facts through the channels set up by the company.
- Remember that your identity will be protected -if you require it-.
- Ecopetrol will not allow any type of retaliation for having presented the complaint.
- Professional support will be provided

Dear collaborators and related parties:

Our company has strategic objectives, processes that support the objective, and risks implied in the tasks and controls to mitigate the objectives, which are a part of the Internal Control System. At Ecopetrol USA, we all have an obligation to fulfill our duties, with the aim of achieving objectives and preventing risk materialization.

Failure to do so violates the accountability principles set forth in this Code and in our Internal Control System.

The internal controls are designed to protect our management, and that is why we are all part of this system.

Behaviors that are contrary to ethics, with repercussions for the contractors, allies, and clients of Ecopetrol USA Companies.

The legal representative, attorney, authorized officer or whoever acts on behalf of Ecopetrol USA Companies for the execution of any agreement, contract, service order, among others, shall be authorized to terminate the contracts or agreements entered into with the contractor for Ecopetrol USA Companies, regardless of the singular or plural nature of the contractor (not considering the form of association), once the established and agreed contractual procedures have been exhausted, and after obtaining the opinion of the Compliance Officer of Ecopetrol USA, confirming one or more of the conducts described below:

- Any of the situations described in the declaration contained in the supplier registry (Declaration of Prevention of AML/CTF).
- Any action or omission that corresponds to acts of fraud, bribery and corruption, violations of the FCPA, unauthorized gifts, unauthorized entertainment and unauthorized hospitality, conflicts of interest or ethics, as identified in the provisions of this Code and applicable regulations.

PROCEDURE

Once the complaint is received through the ethics hotline, the competent department will assess the merit of the information. For this purpose, you may be asked for information or any type of evidence that allows the department to confirm the facts surrounding the reported conduct.

During the term that is estimated based on the complexity of the ethical case, the competent department will contact the person(s) implicated in the complaint to provide explanations, request evidence to support their defense, and contest existing facts or evidence.

Once the competent department submits its findings as to relevance and validity of the reported conduct, the merit of the action will be evaluated by the Compliance Officer of Ecopetrol USA.

After concluding the previous process, should there be merit to show the existence of behaviors that are contrary to ethics, which have repercussion and that give rise to the termination of contracts or agreements, the Compliance Officer of Ecopetrol USA will review or render an unfavorable confirming opinion, as the case may be, which will be sent to the authorized official, or whoever acts on behalf of Ecopetrol USA and any of its subordinates or subsidiaries will be informed, for the exhaustion of the processes required for the termination of the respective contracts or agreements.

If the elements of the findings do not lead to the reasonable confirmation that the reported conduct was contrary to the Code, the complaint will be closed. In the event new information arises that

supports the existence of the previously reported conduct, after a thorough evaluation outlined above, the Company's highest ranked Ethics and Compliance Officer will subscribe and render the appropriate opinion.

Any conduct that violates this Code will be managed according to the procedures set out and to other legal and contractual provisions that may be applicable, without prejudice to the authority that Ecopetrol USA must invite and select different suppliers and contractors, as well as to evaluate their performance.

Frequently asked questions Code of Ethics and Conduct:

Who are beneficiaries at Ecopetrol USA?

Beneficiaries are those who receive services from the company, because of or in relation with a link with Ecopetrol or that of their relatives, such as pensioners, users of the health service, education or any other service, assistance or retribution that implies the use of goods or resources of Ecopetrol.

Does the Code of Ethics and Conduct apply to the workers and contractors of the Ecopetrol USA Companies?

Yes. Keep in mind that the Code of Ethics and Conduct is applicable to Ecopetrol USA Companies, and to people who, regardless of their corporate or individual nature, have any relationship with Ecopetrol USA Companies. This includes:

workers, beneficiaries, members of the Board of Directors, shareholders, 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.

Does the Code of Ethics and Conduct apply to the actions of beneficiaries of Ecopetrol USA Companies' workers?

Yes. It applies as related to those who are registered as beneficiaries, that is, those who receive services because of or in relation with their link with Ecopetrol, such as pensioners, users of health and education services, or any other form that implies the use of assets or resources of the company.

Where should I report potential situations that may constitute a violation of the Code of Ethics and Conduct?

Register your complaint in the ethics hotline of Ecopetrol, entering:

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

What is a complaint?

It is the mechanism or action of any person to report, by means of the ethics hotline, the facts or inappropriate conduct that may constitute a violation of the Code of Ethics and Conduct that require verification. Complaints may be of an ethical nature or a compliance nature, as set out in internal regulations.

What is a dilemma?

These are doubts that may arise from the actions of the recipients of the Code of Ethics and Conduct regarding the principles of the Code and its guidelines relative to conflicts of interest or ethics, gifts, entertainment and hospitality, corruption, bribery, fraud, money laundering, terrorist financing, FCPA, human rights, social responsibility, use of goods and information management, among others,

What is a query?

These are requirements related to due diligence procedures, associated with the prevention of acts of fraud, corruption, bribery, money laundering, terrorist financing and violation of the FCPA. Through these queries, possible warning signs are reviewed regarding contractors, suppliers, partners, or workers, among others, and recommendations are issued to mitigate the potential risks detected.

Does the FCPA prohibit providing gifts, entertainment and hospitality to friends who are public officials?

The FCPA prohibits giving "anything of value" to a public official. This includes gifts, entertainment, and hospitality. Although your relationship with the official is personal, the fact that you invite him to dinner or give him a gift, entertainment or hospitality could become a risk for Ecopetrol. Therefore, before giving a gift, you should consult the internal regulations or the respective compliance area, through the ethics hotline of Ecopetrol.

What does the FCPA require in relation to third parties?

The FCPA requires: (1) conducting due diligence before

hiring a third party; (2) requiring all third parties to certify that they understand FCPA obligations and agree to comply with them; (3) any contract with a third party includes the obligation to comply with the FCPA, according to internal regulations; and (4) monitoring of compliance of the third party with the obligations of the FCPA.

What do I do if one of my workers reports a conflict of interest or ethics conflict?

It is the obligation of every supervisor to send a copy of the records related to a conflict to the Compliance Officer of Ecopetrol USA with the response or procedure applied to that statement. Likewise, it is your obligation to adopt measures so that the conflict does not materialize in the exercise of the activities assigned to the worker.

I am aware of a situation that may breach the Code of Ethics and Conduct, but I am afraid to report the situation to the ethics hotline, because my immediate boss may retaliate against me. What should I do?

You must report the aforementioned facts to the ethics hotline. There is no reason for fear; reporting is an obligation that does not generate retaliation against the complainant.

In any event, it is pertinent to bear in mind that you cannot make complaints with the knowledge that it is false information, as you can violate the principles of integrity and responsibility set out in this Code.

The manager of the contractor company with respect to which I perform supervision activities has invited me to give a talk in a hotel in Cancun (Mexico), to go with my wife and children. The academic sessions take place in the morning and in the afternoon, they invite us to the scheduled recreational activities or leave the afternoon free. Can I accept the invitation?

Report the case to your immediate supervisor and present a dilemma in the ethics hotline. According to what is set forth in the internal procedures, you should

not accept such invitations from people who have a commercial interest with the company. Therefore, you must refrain from accepting the invitation and wait for the corresponding ethical concept to be issued.

Currently I work in the XX Department and as part of my functions I must receive reports and different deliverables from the ZZ firm, where a brother-in-law works as a member of the team that presents the contract products. What should I do?

You must withdraw from the functions you are performing that are related to the functions of your brother-in-law or from the activities carried out by the contractor who employs it, because this circumstance generates a conflict of interest. You must report the situation to your superior and to the Compliance Officer of Ecopetrol USA.

I worked for four years in the firm XYZ. Six months ago, I joined Ecopetrol and today I was appointed to be part of the planning team in a selection process related to the branch of that company and it is likely that I may be designated to evaluate the offers. The firm in question could be interested in submitting an offer, according to the information that my ex-colleagues with whom I have a friendship relationship have given me. What should I do?

Whenever an ethical conflict has the potential to materialize, you must immediately report it to your superior in order to be assigned to other processes or projects in which you are not going to have a relationship with your previous employer or with your friends.

This situation must be reported to the Compliance Officer of Ecopetrol USA.

As part of my functions, I must review and approve the reports delivered by the contractor YY. As a result of that interaction with that company, I became friends with two of their employees, whose work I must supervise. They now have a sentimental relationship, have decided to get married and have asked me to be their wedding best man. What should I do?

Bearing in mind that you must verify and approve the reports submitted by the employer who are now your friends and being their wedding best man, there is an ethical conflict; therefore, you must report the situation to your supervisor, withdraw immediately from the work related to the contractor YY, and report it to the Compliance Officer of Ecopetrol USA.

If I report symptoms of Covid-19 or any other disease, will I be discriminated against?

No. The company requests the timely reporting of symptoms precisely to protect your life and that of your environment. Reporting your health status is your responsibility, it is your demonstration that you are committed to life. Ecopetrol and its business group reject all types of discrimination.

I noticed that a co-worker turns off the camera and microphone in order to be absent and walk her dog during periodic department meetings - giving the appearance that she is present - Is this ethical behavior?

No. Compliance with work hours and participation in work activities are mandatory. Remember that all Ecopetrol workers must respect the spaces provided by the organization or agreed with our bosses; This absence, in addition to constituting a deception, exhibits a lack of respect towards colleagues and management.

A few days ago, I realized that a contractor worker is receiving sexual advances from an Ecopetrol worker and he is afraid to report it because he may lose his job. Can I report it?

Yes. You must do it through the ethical line where your identity and the victim's identity will be protected. Remember the importance of doing it with relevant data and facts, indicating conditions of, time, manner and place of the situations. If you have evidence, provide it. At the same time, encourage the victim to file a report. At Ecopetrol we do not tolerate disrespectful treatment and we reject behaviors of sexual harassment.

What is a facilitation payment?

They are small, unofficial, and improper payments made to obtain or expedite the performance of a routine or necessary action to which the person making the payment is entitled. These payments are known as speed or grease payment.

What is a lobbying fee?

It is the delivery of money or in-kind benefit to a person or group of people to influence the decisions of public authorities, on matters that are of interest to whoever makes the payment. This type of payment by or in the name of Ecopetrol USA Companies is prohibited in Ecopetrol USA.

Do you know that Ecopetrol USA have a series of procedures, instructions, guides, handbooks, risks and controls that we must apply? How well do you know them?

Knowing the rules of the company is a must. Not knowing them and failing to apply them can result in a breach of the Code of Ethics and Conduct.

Consult the ethics hotline.

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

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



Ethics Hotline

+1 855 216 6142



www.ecopetrol-usa.com

Do not let this happen to you!

The main sanctions for violations of the FCPA have been imposed because of events such as:

- Bribe to customs agents, aimed at securing the renewal of contracts.
- Signature of a fictitious consulting contract with a third party, characterizing the payments in the books and records as legitimate consultancy expenses, to support a bribe.
- Payments to government officials in order to be granted environmental licenses, regulatory approvals and authorizations.

Ask yourself the following questions in order to avoid accepting gifts, entertainment or hospitality that ignore the business guidelines:

- Is the intention to show kindness or is it intended to influence a decision?
- Would accepting it be an obligation to the third party?
- Would you be embarrassed or fearful if your colleagues find out that you received it?
- If you see that your partner is offered this kind of gift, entertainment or hospitality, how would you see it?
- Would you offer this kind of gift, entertainment or hospitality without expecting anything in return?

Do not let this happen to you!

I am the administrator of a contract and I authorized the payment of some goods that were delivered by the contractor, supported by the certificate of compliance with the technical specifications issued by it, without having personally verified them. Could doing be considered a breach of the Code of Ethics and Conduct?

Yes. It is your obligation to protect the resources of the Company; therefore, such actions breach the principle of responsibility. Remember that before making any payment, you must confirm that the contractor has complied with all that has been agreed.

I falsely registered a cousin's child, as my own son, so that he could access the benefits of Ecopetrol USA. Since I do not have my own descendants, I did not consider it improper because I love this child as if it were my own and he needs the resources to be able to study because his father is undergoing a difficult economic situation. Did I breach the Code of Ethics and Conduct?

Yes. Failing to state the truth and reporting inconsistent information to receive a benefit for you or for a third party, which also involves the improper use of resources, violates the principles of integrity and responsibility of the Code.

My daughter needs computer paper to print a school assignment, can I take some paper from the office?

No. The paper supplied by Ecopetrol is intended for your company work and not for personal use of personnel at their home. Such action breaches the integrity and responsibility principles.

Do not let this happen to you!

My spouse works with a contractor, and I am the administrator of that contract. Am I obliged to withdraw from this role because of a conflict of interest?

Yes. There is an ethical imperative to withdraw. You must report the matter to your supervisor and to the respective compliance area.

My stepfather works in a department other than mine. My boss has appointed me to do a job with that area and my mother's husband will be the team leader. Is there a problem if we work together?

Yes. Your stepfather has no kinship relationship, but given your relationship with him, whether good or bad, this can affect your independence and objectivity, in which case it would be an ethical conflict. Being part of this activity without reporting the conflict is a breach of the integrity principle, and therefore requires you to report the conflict to your immediate boss so that one of the two employees is withdrawn from the process. Likewise, you must report the conflict to the compliance department of the company.

I support the supervision of a material transportation contract and I must validate the quantities and services for billing. My son-in-law is a partner of the contractor and one of the vehicles with which he provides the service is owned by my uncle. Is this a conflict of interest or ethical issue, even if I am not the contract administrator?

Yes. You are in conflict because you make decisions relative to the contract in which your relatives are involved.

Do not let this happen to you!

I worked for a firm in the Oil & Gas sector, and I have been selected to work for Ecopetrol. In this new role, I have been appointed to the evaluation committee of a contractor selection process, in which the company for which I worked before is participating. The people who would sign and structure the offer are my previous bosses and colleagues, who, before my appointment as an evaluator, had mentioned to me their interest in talking about the process, the evaluation mechanism, and how they could improve their offer to be awarded the contract. Should I report this situation?

Yes. You must report a dilemma through the ethics hotline and report, in writing, to your immediate supervisor that you face an ethical conflict because your former bosses and colleagues will participate in the assigned process. Also, it is necessary to report the fact that the contractor is trying to obtain an improper advantage.

I am the supervisor of a contract, not the administrator. My job is to validate the work schedules of the contractor's staff. I have a sister who is unemployed. Can I ask the contractor to hire my sister for execution of a contract other than the one they have with Ecopetrol?

No. In accordance with the Code of Ethics and Conduct, neither the workers nor their families should use their position in Ecopetrol to obtain benefits.

We are close to the end of the year and the contract that I manage is somewhat delayed, but I know that it can be updated in early January. Is it possible to certify the receipt to satisfaction of an activity and authorize its payment with the commitment that it will be completed in January as this will enable us to execute the resources allocated to this period?

No. Keep in mind that the integrity principle imposes the obligation of assuring internal controls, guaranteeing contractors' fulfillment of their commitments, and verifying that all information processed for a payment is true.