



ECOPETROL USA INC.

COMPLIANCE DEPARTMENT

ANTI-CORRUPTION & ANTI-BRIBERY POLICY

Date of approval: 2 Feb 2026

Version: 1

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LIST OF VERSIONS

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PREPARED BY	REVIEWED	APPROVED
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I. ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

Ecopetrol USA, Inc. and its subsidiaries (referred hereafter collectively as the “**Company**”) are committed to conducting our business ethically and in compliance with all applicable laws wherever we operate. Ethical behavior is not merely a legal obligation—it also makes good business sense. It ensures efficiency and effectiveness, two critical components required in today’s increasingly competitive and complex business environment.

This Anti-Corruption and Anti-Bribery Policy (the “Policy”) represents the commitment of the Company to comply with all the laws that criminalize giving bribes to Government Officials, and sometimes to private citizens as well, if the purpose is to obtain an improper business advantage. While that may seem straightforward, the definition of “bribe” under these laws can be extremely broad and can include promising, offering, or giving things of value, such as money, entertainment, gifts, meals, travel, lodging, and charitable and political contributions to or for the benefit of a Government Official. Not only can the Company be liable for violations of these laws, but individual Company personnel can also be liable.

As part of this commitment, the Company has adopted this Anti-Bribery Policy within the framework of implementing an Anti-Bribery Management System aligned with the ISO 37001:2025 international standard.

The Company enforces a “Zero Tolerance” stance against bribery. This Policy establishes specific measures for managing bribery-related risks, ensures compliance with national and international regulations, and strengthens internal controls to prevent, detect, and mitigate such risks within the framework of responsible Stakeholder engagement.

This Policy has the following specific objectives:

1. Promote an ethical culture within the Company based on a “Zero Tolerance” approach, with a focus on preventing corruption and bribery.
2. Establish and strengthen mechanisms for the timely and effective detection, investigation, and mitigation of corruption and bribery incidents within the Company.

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This Policy explains our approach to full compliance with the U.S. Foreign Corrupt Practices Act (“**FCPA**”), and all countries’ anti-corruption laws and regulations that apply to the Company (collectively, “**Anti-Corruption Laws**”). This Policy provides guidelines designed to minimize the risk of criminal or civil enforcement to the Company and its Personnel.

II. SCOPE & APPLICABILITY

This Policy serves as the Company’s principal framework for Anti-Corruption compliance. Any documents developed to support or implement this Policy must remain consistent with its provisions, unless the Compliance Department has expressly authorized an exception.

This Policy, together with the Anti-Bribery Management System Manual, forms the Company’s primary guidance on Anti-Bribery compliance. Any documents developed to support or implement this Policy must remain consistent with its provisions.

This Policy applies to all Company Stakeholders and all Company Personnel, as defined in Section III. Company Personnel must adhere to these Guidelines, comply with all applicable laws in every country where the Company operates, and uphold the highest ethical standards in all business activities.

Furthermore, this Policy applies to all transactions conducted by the Company and its personnel anywhere in the world. Company personnel who violate Guidelines or Anti-Corruption Laws are subject to disciplinary action, up to and including suspension or termination of employment. To the extent permitted by contractual obligations, the Company may exercise right to terminate a contract with any Transaction Partner who is found guilty of violating Anti-Corruption Laws.

1. Expectations for All Company Personnel

All Company Personnel are expected to 1) read and apply this Policy; 2) recognize concerns regarding compliance; 3) ask questions and promptly report any suspected Anti-Corruption Law violation; 4) read, understand and abide by the Company’s Code of Ethics and Conduct; 5) act with the highest level of integrity and avoid even the appearance of impropriety.

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When you are considering an action, think about these questions:

- *Is it legal?*
- *Is it ethical?*
- *Is it consistent with Guidelines?*
- *Would it reflect positively on you and the Company?*

If you are not sure, ask your direct supervisor, a corporate-level executive manager, the General Counsel, or the Compliance Officer.

2. Reporting Requirements

If Company Personnel suspects that any activity could violate this Policy or any Anti-Corruption Laws, it must be reported through the reporting channels set forth in the Company's Complaints and Internal Investigations Manual (Ethics Hotline: <https://secure.ethicspoint.com/domain/media/en/gui/41224/index.html> or 1-855-216-6142). The Company will handle all reports according to that Manual. Company Personnel must not ignore any situation that causes reasonable suspicion and hope it will go away or be handled by someone else. Ignoring a potential violation may result in a potential liability for the Company and its Personnel.

The Company will not tolerate retaliation of any kind against anyone who makes reports in good faith.

3. Expectations from Company Managers and Supervisors

Company personnel who supervise others must promote a culture of compliance by setting ethical examples. A Company manager or supervisor must:

- Ensure that all Company personnel under their supervision understand and comply with this Policy and Anti-Corruption Laws and raise any concerns regarding these;
- Never request—directly or implicitly—that Company personnel achieve business results at the expense of ethical obligations;
- Stop violations of this Policy and Anti-Corruption Laws by Company personnel;
- Notify the Compliance Officer or the General Counsel of any suspected violation; and
- Respond to questions and concerns related to this Policy or refer Company personnel to another Company resource including the Compliance Officer or the General Counsel.

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4. Area of application in the context of organizational structure

This Policy is used on the Company level and applies to all its structural subsidiaries. Such as:

- Ecopetrol USA, Inc.
- Ecopetrol America, L.L.C
- Ecopetrol Permian, L.L.C
- Ecopetrol US Trading, L.L.C.
- ECP Hidrocarburos México, S.A de C.V.

III. KEY CONCEPTS AND DEFINITIONS

Anti-Bribery Management System: A set of coordinated policies, procedures, controls, and responsibilities implemented within an organization to prevent, detect, and respond to Bribery risks in accordance with applicable law.

For the purposes of the Anti-Bribery Management System, the “applicable law” includes, but is not limited to, the following national and international (to the extent adopted by applicable U.S. law) provisions:

- Foreign Corrupt Practices Act (FCPA);
- The Sarbanes-Oxley Act (SOX);
- US Federal Bribery Statute;
- DOJ Compliance Program Guidelines;
- Recommendations for the Implementation of an Anti-Corruption Ethics and Compliance Program for UNODC Companies;
- Business Principles for Countering Bribery - Transparency International; and
- US Sentencing Guidelines.

Anything of Value: Anything of Value is very broad and includes: (i) cash and cash equivalents in any amount; (ii) gifts; (iii) meals, entertainment, travel, and other hospitality; (iv) training; (v) in-kind services; (vi) business, employment, or investment opportunities; (vii) contractual rights or interests; (viii) discounts or credits; (ix) commissions, brokerages, kickbacks, rebates, loans, or other compensation; (x) payment of other expenses; (xi) political donations or charitable contributions; and (xii) any other thing of value.

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Board of Directors: Governing body of the organization, composed of individuals elected or appointed to oversee the organization’s strategic direction, approve major decisions, and ensure effective governance. In the context of an Anti-Bribery Management System, the Board is responsible for demonstrating leadership and commitment, ensuring the adequacy of the system, and promoting a culture of integrity and compliance throughout the organization.

Finance & Administration Manager: refers to a senior executive responsible for managing the financial actions of the Company. The Finance & Administration Manager's duties include: tracking cash flow and financial planning as well as analyzing the company's financial strengths and weaknesses and proposing corrective actions. They are responsible for managing the finance and accounting divisions and for ensuring that the company’s financial reports are accurate and completed in a timely manner.

Compliance Officer: The Company employee with responsibility for day-to-day administration and oversight of this Policy, including responding to inquiries from Company personnel about anti-corruption compliance.

Covered Recipient: Any (i) Government Official (as defined below); (ii) child, spouse, or other close relative of a Government Official; or (iii) any other person, if you know or have reason to know that the person will give, offer, or promise Anything of Value to a Government Official.

Company Personnel: Company officers; directors; employees; agents; employees of any Company affiliate, subsidiary, or other entity controlled by the Company; temporary and contract personnel; and non-employee third parties acting on the Company’s behalf.

General Counsel (GC): it’s the company's head lawyer responsible for managing the Legal Department, as well as serving as Secretary of the Board of Directors.

Government Official: Any (i) officer or employee of any government or public international organization (e.g., United Nations, World Bank) or any agency, department, or instrumentality thereof (including officers and employees of an enterprise entirely or partially owned, controlled, or operated by any government); (ii) political party; (iii) officer or employee of a political party; (iv) candidate for political office; or (v) person acting on behalf of such government or public international organization, or any agency, department, or

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instrumentality thereof.

Improper Performance: The performance or non-performance of an act, or the making of a decision in breach of an expectation or duty of good faith, impartiality, and/or trust.

Red Flag: Any indication of a possible violation, or any fact or circumstance that increases the likelihood of a violation of this Policy, the Guidelines or Anti-Corruption Laws. Red Flags are not necessarily violations, but they do indicate that further review is necessary to determine whether a violation has occurred or whether additional steps must be taken to ensure that no violation occurs.

Senior Management: The person, or group of people, who directs and controls the Company at the highest level (e.g., the power to delegate authority and provide resources within the Company). If the scope of the Anti-Bribery Management System covers only part of an organization (i.e., an affiliate or subsidiary of Ecopetrol USA Inc.), then Senior Management refers to those who direct and control that part of the organization.

Stakeholders: Individuals or entities that may influence, be influenced by, or have an interest in the Company’s activities and its commitment to prevent bribery. This includes, but is not limited to, employees, shareholders, transaction partners and the communities where the Company operates.

Transaction Partner: Any joint venture partner, affiliate, distributor, agent, temporary agency personnel, consultant, service company, service provider, vendor, contractor, subcontractor, or any other third party engaged by the Company to act on its behalf or otherwise having authority to act on the Company’s behalf in transactions with Government Officials, or those that are likely to interact with Government Officials in any way related to the Company’s business.

IV. THE FOREIGN CORRUPT PRACTICES ACT (“FCPA”)

1. Anti-Bribery Requirements

The FCPA prohibits offering, promising, giving, or authorizing the provision of Anything of Value, either directly or indirectly, to any Government Official or Covered Recipient to obtain or maintain business or any other improper advantage. This prohibition is very broad. There is no monetary threshold, and even small payments or items of minimal value could be considered bribes. Bribes are not necessarily payments of money, but can include Anything

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of Value, such as:

- Gifts
- Entertainment
- Payment or reimbursement of travel expenses
- Charitable donation or social contribution
- Discounts on products and services not readily available to the public
- Offer of employment for a non-U.S. government official or a relative of the non-U.S. government official
- Promise or assumption to pay or forgiveness of debt
- Personal favors
- Scholarship to a relative of non-U.S. government official
- Loans at favorable interest rates

Company personnel may not offer or provide Anything of Value to a Government Official or other Covered Recipient in return for favorable business treatment, such as:

- Influencing a desired action or decision;
- Inducing an act in violation of a lawful duty;
- Causing a person to refrain from acting in violation of a lawful duty;
- Securing any improper advantage; or
- Affecting or influencing the decision of a government or government instrumentality.

The bribery of non-government officials is known as “commercial bribery”. It is prohibited for Company personnel to engage in any bribery activity with any private party or government official.

Company personnel must obtain prior approval before offering or providing Anything of Value, directly or indirectly through a Transaction Partner or other third party, to a Government Official or other Covered Recipient. It is the responsibility of Company Personnel to understand whether those with whom they interact are Government Officials or other Covered Recipients. If unsure, Company Personnel must ask the Compliance Officer or the General Counsel.

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2. Accounting Requirements

The FCPA requires public companies whose shares are traded on a U.S. stock exchange to comply with all U.S. Securities and Exchange Commission accounting rules. While the Company is not a publicly traded company, it is the Company's policy to maintain internal accounting controls based upon sound accounting principles. Accordingly, if the Company or its personnel provide Anything of Value to a Government Official or other Covered Recipient, the transaction must be timely and accurately recorded in the Company's books and records. All entries must include reasonable detail so that the accounting records fairly reflect the transactions. At a minimum, all such transactions must:

- Occur only with appropriate Company authorization;
- Be periodically reviewed to identify and correct any accounting discrepancies, errors, and omissions; and
- Be recorded properly and in accordance with all applicable Company policies in Company's books and records, including:
 - The names and positions of the recipients;
 - The names and positions of the Company Personnel involved;
 - A description of the payment or other thing of value;
 - The value of the payment or other thing of value;
 - The reason for providing the thing of value; and
 - If applicable, a description of the Company's products or services being promoted, demonstrated, or explained, or the applicable contractual provision.

Company personnel who provide information leading to false, misleading, or inaccurate entries or those who make false, misleading, or inaccurate entries in the Company's accounting records may be subject to disciplinary action, up to and including termination.

3. Potentially Permissible Payments to Government Officials

In limited circumstances, it may be permissible under the FCPA to provide something of value to or on behalf of a Government Official. This includes payments expressly permitted by the written laws of the Government Officials' country and reasonable and bona fide expenditures made on behalf of Government Officials that are directly related to either (1) the promotion, demonstration, or explanation of a company's direct or indirect operations, goods or services, or (2) a contractual obligation. Examples of such payments include paying:

- A government inspector per diem in accordance with the Company's Travel Policy,

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when that payment is specifically required under the circumstances by the country's written regulations;

- For reasonable travel, meal, and lodging expenses for the appropriate Government Official to attend a demonstration of a company's products; and
- For reasonable travel, meal, and lodging expenses for the appropriate Government Official to attend a meeting required by a contract between a company and the official's country.

These exceptions are very narrow, and Company personnel may never give Anything of Value to a Government Official just for the sake of doing so or under circumstances that create even the appearance of impropriety—no matter how small the value.

Even if it seems likely that payment is permissible under one of these scenarios, Company Personnel must obtain written approval from the Compliance Officer or the General Counsel before providing or offering Anything of Value to a Government Official.

4. Responsibility for Actions of Transaction Partners

Company personnel may not provide Anything of Value to Government Officials or Covered Recipients indirectly through Transaction Partners that the Company could not provide itself. In certain circumstances, the Company and its personnel may be liable for improper payments made by a Transaction Partner to a Government Official or other Covered Recipient **even if the Company did not actually know** about the payment. To minimize this risk, the Company must conduct due diligence on all Transaction Partners before engaging them, and in case the nature of the relationship with a Transaction Partners includes the provision of services, goods or may include acting as representative or agent of the Company, the Transaction Partner must agree to abide by Anti-Corruption Laws before the Company signs any engagement with these providers.

Violations of Anti-Corruption Laws may be subject to criminal liability. Under the FCPA, violations are punishable by a fine, imprisonment or both. Civil penalties also may be assessed.

An individual's violations may also subject the Company to significant fines and other penalties.

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V. ETHICAL BUSINESS STANDARDS: OVERVIEW OF BEST PRACTICES

1. Giving Bribes Prohibited

Company personnel shall not offer, promise, authorize the provision of, or provide Anything of Value to any:

- Government Official or other Covered Recipient to obtain or maintain business or a business advantage;
- Government Official or other Covered Recipient when directly or indirectly requested or demanded by that individual as a condition to acting or refraining from acting;
- Person to obtain or maintain business or a business advantage if it relates to any Company business with any connection to any Government; and
- Person in violation of Anti-Corruption Laws.

2. Receiving Bribes Prohibited

Company personnel shall not request, agree to receive, or accept Anything of Value from any person as an inducement or reward for the Improper Performance of any activity or duty. In addition, occasional unsolicited courtesy gifts or favors can only be accepted if permissible according to the rules set forth in the Company’s Employee Handbook.

3. Business Courtesies

Business courtesies, such as meals, travel, lodging, gifts, and entertainment, can violate Anti-Corruption Laws when provided to influence a Government Official. Business courtesies should never be offered under circumstances that might create the appearance of impropriety, and all business courtesies must comply with the Company’s applicable policies. All such courtesies should be directly related to business discussions, the demonstration, promotion, or explanation of the Company’s goods or services, or a contractual obligation involving the Company’s goods or services. Unless otherwise approved in advance, such courtesies should not exceed the amounts and frequencies described below. Company Personnel may not use their own funds (i.e., ones for which they will not seek reimbursement from the Company) to provide business courtesies. Before providing a business courtesy, Company Personnel must determine if it is unlawful under any applicable law, prohibited by the recipient’s employer, or inconsistent with any relevant contractual language. If you are not sure, ask the Compliance Officer or General Counsel.

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a. Recordkeeping

Expenditures for all business courtesies provided to Government Officials or other Covered Recipients must be clearly and accurately reflected in expense reports and the Company’s books and records and comply with the Company’s applicable policies.

All records, reports, and documents related to steps taken by Company personnel to obtain approval for business courtesies to Government Officials and other Covered Recipients, as well as approvals and any other documents prepared by the Company or its Personnel in such matters should be maintained in the Company’s files and in accordance with the Company’s internal regulations.

b. Specific Restrictions for Company Personnel in the Procurement Department

Company personnel working in the Procurement Department are subject to a “zero tolerance” policy regarding all forms of business courtesies to Government Officials and therefore are prohibited from providing any meals, gifts, entertainment, travel, or lodging to Government Officials or Covered Recipients. Any deviation from this rule requires prior written approval from the Senior Supply Chain Advisor and the Compliance Officer.

VI. TRANSACTION PARTNERS

1. Due Diligence on Transaction Partners

The Company must conduct due diligence before retaining or working with any Transaction Partner. The due diligence must evaluate potential compliance risks and determine whether the proposed Transaction Partner is reputable and qualified. The level of due diligence required depends on the level of potential risk and exposure for the Company as described in **Appendix A**. After completing the appropriate level of due diligence, the Compliance Officer, as applicable depending on the level and/or results of the due diligence, must review and approve the results before the Company may engage or work with the Transaction Partner.

2. Contracts with Transaction Partners

The Company must execute a written contract with each Transaction Partner in accordance with the Contracts Manual, before the Transaction Partner may act on the Company’s behalf. The contract must include the Transaction Partner’s agreement to comply with the FCPA, and all other applicable Anti-Corruption Laws.

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3. Payments to Transaction Partners

Unless the Finance & Administration Manager or President (when applicable) provides prior written approval, the Company will not make the following types of payments to any Transaction Partner:

- In cash;
- With corporate checks payable to “cash,” “bearer,” or third-party designees of the party entitled to payment; or
- To an individual, entity, or account outside the recipient’s country of residence or the country where the work is performed.

All payments made to Transaction Partners must be clearly and accurately reflected in the Company’s accounting records, which should include itemized invoices, expense reports, and other documents that identify the recipient, date, cost, and detailed purpose of the payment.

VII. RED FLAGS: SPOT AND REPORT

If you know about or suspect that Company personnel or a Transaction Partner may have violated or may be about to violate the Guidelines or Anti-Corruption Laws, you must notify the Company immediately through the reporting chains described in the Company’s Complaints and Internal Investigations Manual. Company personnel should trust their instincts in recognizing and acting upon concerns. The Company takes all reports seriously and will address them according to the Company’s Complaints and Investigations Manual. Failure to report a suspected violation may be treated as complicity in the inappropriate activity. The Company will not tolerate retribution of any kind against Company personnel who make reports in good faith.

The following are examples of possible violations (“**Red Flags**”) by a Transaction Partner that should be reported:

- Requests payment before the Company is awarded a lease, contract or other business;
- Requests a large contingency or “success” fee;
- Requests reimbursement of extraordinary, poorly documented, or last minute expenses;
- Requests payment in cash, to a numbered account, or to an account in the name of a different person;

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- Requests payment in a different country, especially if it is a country with little banking transparency;
- Is a Covered Recipient or has a family member who is a Government Official;
- Refuses to disclose its owners, partners, or principals;
- Uses a shell or holding company that obscures ownership without a credible explanation;
- Has a business that seems understaffed, ill-equipped, inexperienced, inconveniently located, or otherwise not capable of undertaking its proposed relationship with the Company;
- Has not been in business very long, is insolvent or has significant financial difficulties that would reasonably be expected to impact the venture;
- Displays ignorance of or indifference to local laws and regulations;
- Has a business or banking reference that unreasonably refuses to answer questions, or provides problematic answers;
- Is the subject of credible rumors or media reports indicating questionable ethics;
- Has been recommended or required by a Government Official or other Covered Recipient;
- Is not expected to perform substantial work;
- Intends to engage third parties (non-employees) to perform the primary services under the contract;
- Requests an unusual contract term or terms;
- Lacks documentation supporting a payment request;
- Provides vague, non-specific descriptions for payments or aggregated (non-itemized) entries;
- Provides invoices with terms that Company personnel do not understand;
- Uses catch-all phrases on invoices or in accounting entries, for fees or payments such as "special," "expediting," "miscellaneous," "other," or "extra";
- Makes payments to third parties in regular or round denominations;
- Requests a political or charitable contribution;
- Refuses to answer due diligence questions; or
- Refuses to agree to anti-bribery provisions in contract.

These are just examples of Red Flags. If any information causes Company Personnel to suspect that a violation may have occurred, or if there are concerns about potential compliance risks, Company Personnel must notify the Company immediately through the reporting mechanisms outlined in the Company's Complaints and Internal Investigations

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VIII. MONITORING COMPLIANCE

The Company may conduct periodic internal or external audits or other reviews of this Policy to determine whether it is reducing the risk of anti-corruption violations effectively and detecting potential violations when they occur. The Compliance Officer will determine if internal or external audits are necessary and will be responsible for the scope and oversight of such audits.

The Company may take other steps periodically to review its compliance with the Anti-Corruption Laws, including:

- Randomly reviewing Company’s books and records related to transactions with Government Officials or other Covered Recipients;
- Providing updated training to and obtaining compliance evaluations from Company Personnel responsible for compliance; and
- Interviewing Company Personnel responsible for relationships with any Transaction Partners.

The Compliance Officer will maintain all audit and review reports and findings in accordance with the Company’s Records Retention Policy and present the findings to Company Management and the Audit Committee of the Company’s Board of Directors. The Company will implement the audit recommendations; address any identified compliance issues; assess the performance of Company Personnel involved in compliance matters and take appropriate steps to reward or discipline the personnel; and make any appropriate changes to Company’s audit process.

IX. PREVENTION & FIGHT AGAINST BRIBERY

The Company, in accordance with its Compliance Program and with the ISO 37001:2025 Standard, has adopted a systematic approach to prevent, detect, mitigate, and remedy bribery-related risks through the implementation of its Anti-Bribery Management System (“ABMS”).

Ensuring the effective implementation, communication, and performance of the ABMS is a shared responsibility of the Board of Directors, Senior Management, General Counsel, and the Compliance Officer based on the roles and responsibilities assigned in the Compliance Program

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and the Anti-Bribery Management System Manual and this Policy.

Periodically, the Company may evaluate its anti-bribery objectives and overall system performance. Based on this review, the Compliance Officer should identify and formulate relevant improvement opportunities. Any required corrective actions will be taken, and changes to processes, controls, or audit mechanisms will be implemented to strengthen the system and ensure its continued effectiveness.

1. Reporting Mechanisms

If any Company Personnel becomes aware of the conduct that could potentially breach this Policy or any relevant anti-bribery regulations, they are required to report it using the reporting mechanisms described in the Company's Complaints & Internal Investigations Manual.

Reports can be submitted through the Ethics Hotline at <https://secure.ethicspoint.com/domain/media/en/gui/41224/index.html> or by calling 1-855-216-6142. The Company will address all concerns in accordance with its Complaints & Internal Investigations Manual.

Company Personnel must take all concerns seriously and not overlook suspicious activity or rely on others to act. Failing to report such issues may result in legal or disciplinary consequences for both Company Personnel and the Company.

The Company is firmly committed to protecting individuals who report concerns in good faith and will not allow any form of retaliation.

2. Disciplinary Measures & Sanctions

Stakeholders of Ecopetrol USA Inc. and its subsidiaries are required to comply with the provisions of this Policy, and all the internal framework and guidelines that compose the Anti-Bribery Management System.

Any breach of this Policy, the Anti-Bribery Management System Manual, or any other related guidelines, shall be considered a violation subject to disciplinary measures.

Company Personnel who violate this Policy or applicable anti-bribery laws may be subject to disciplinary action, including suspension or termination of employment. Where permitted by

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contractual terms, the Company may also terminate agreements with any contractor, supplier, business partner or client found to have breached the obligations outlined in this Policy.

X. INTERNAL COMPLIANCE STRUCTURE

1. Governing Body

The Governing Body shall demonstrate leadership and commitment with respect to the anti-bribery management system by:

- Ensuring that the organization’s strategy and its anti-bribery policy are aligned;
- Receiving and reviewing, at planned intervals, information on the content and operation of the organization’s anti-bribery management system;
- Requiring that adequate and appropriate resources are assigned and made available for the effective operation of the anti-bribery management system;
- Exercising reasonable oversight over the implementation of the anti-bribery management system by top management, its intended outcomes, and its effectiveness.

2. Top Management

The Top Management shall demonstrate leadership and commitment with respect to the anti-bribery management system by:

- Ensuring the establishment of the anti-bribery policy and anti-bribery objectives;
- Ensuring the integration of the anti-bribery management system requirements into the organization’s business processes;
- Ensuring the availability of the resources necessary for the anti-bribery management system;
- Communicating the anti-bribery policy internally and externally;
- Communicating the importance of effective anti-bribery management and of complying with the requirements of the anti-bribery management system;
- Ensuring that the anti-bribery management system achieves its intended outcomes;
- Directing and supporting personnel to contribute to the effectiveness of the anti-bribery management system;
- Fostering an appropriate anti-bribery culture within the organization;
- Promoting continual improvement;

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- Supporting other relevant roles to demonstrate their leadership in the prevention and detection of bribery within their areas of responsibility;
- Encouraging the use of reporting procedures to raise concerns about suspected or actual bribery;
- Ensuring that no member of personnel suffers retaliation, discrimination, or disciplinary action for reporting in good faith, or on the basis of a reasonable belief, violations or suspected violations of the organization’s anti-bribery policy or anti-bribery management system, or for refusing to participate in bribery, even if such refusal may result in a loss of business for the organization;
- Reporting, at planned intervals, to the governing body on the content and operation of the anti-bribery management system and on reports of serious or systemic bribery.

3. Compliance Officer

The Compliance Officer, with the support of the Company’s Compliance Department, is responsible for day-to-day administration and oversight of this Policy. The Compliance Officer is the main point of contact for Company Personnel regarding compliance with this Policy and Anti-Corruption Laws. If the Compliance Officer is not available, Company Personnel should contact an alternative person designated by the Compliance Officer or the General Counsel.

Similarly, the Compliance Officer shall be responsible for the proper operation and functioning of the Anti-Bribery Management System through the exercise of the Anti-Bribery Compliance Function.

The Compliance Officer is vested with responsibility, authority, independence, and sufficient resources to ensure the effective performance of his or her duties. The Anti-Bribery Compliance Function has the responsibility and authority to:

- Ensure that the anti-bribery management system complies with the requirements of this document;
- Report to the governing body and top management on the performance of the anti-bribery management system;
- Oversee the design and implementation of the anti-bribery management system by the organization;
- Provide advice and guidance to personnel and interested parties on the anti-bribery management system and matters related to bribery.

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4. Legal Department

The Company’s Legal Department works under the direction of the General Counsel to ensure consistent company-wide compliance with this Policy and applicable laws. The Legal Department is an additional resource for ensuring the Company’s global compliance and Company personnel may contact them with anti-corruption or anti-bribery compliance questions.

5. Personnel Responsibilities

Company Personnel are expected to:

- Attend training sessions and timely complete the required web training courses relating to Anti-Corruption;
- Ask the Compliance Officer or the General Counsel any questions about this Policy or Anti-Corruption Laws;
- Understand and follow Guidelines;
- Recognize and report all Red Flags;
- Maintain timely, accurate, and complete records of all expenditures of Company funds in accordance with all applicable policies.

6. Training

To ensure that Company Personnel understand this Policy and the Anti-Corruption Laws, the Company will provide anti-corruption training and resources as appropriate. Furthermore, the Company may provide periodic anti-corruption training to Transaction Partners that pose a heightened corruption risk.

* * * * *

The Company reserves the right to amend or revise this Policy at any time and from time to time. If any questions or concerns about this Policy arise, Company personnel should contact their supervisor, the Compliance Officer, or the General Counsel.

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APPENDIX A:

DUE DILIGENCE PROCEDURES

Before Ecopetrol USA, Inc. engages or conducts business with any Transaction Partner, Company personnel must conduct an appropriate level of due diligence to assess and evaluate any potential anti-corruption concerns and execute a written contract with the Transaction Partner. The Procurement Department should keep records of all due diligence.

LEVEL ONE DUE DILIGENCE

For all proposed Transaction Partners, Company Personnel should obtain full name, address, and the W9 or applicable taxpayer identification number to search in the appropriate database for the name(s) of the Transaction Partner. The LexisNexis World Compliance Online Search Database is the current tool used in ECP USA Inc. to perform initial due diligence in several risk categories. Company personnel should raise any Red Flags or concerns to the Compliance Officer and obtain the Compliance Officer's written approval before executing the contract.

Red Flags: If Level One Due Diligence raises any Red Flags, the Compliance Officer shall have the discretion to disqualify the prospective Transaction Partner from doing business with the Company or require Level Two Due Diligence.

LEVEL TWO DUE DILIGENCE

The Compliance Officer should consider whether the Red Flags require that the Company obtain:

- An International Company Profile from the U.S. Commercial Service's International Company Profile service;
- A background report from Dunn & Bradstreet; and
- More detailed background reports from well-established third-party investigative services.

Government Official Affiliation: If Level One or Level Two Due Diligence determines that a Government Official or other Covered Recipient is affiliated with the Transaction Partner (e.g., officer, director, principal, owner, shareholder, etc.), or that there are significant red

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flags, then the Compliance Officer or General Counsel shall conduct **Level Three Due Diligence** before deciding whether to engage the Transaction Partner.

LEVEL THREE DUE DILIGENCE

When determining the appropriate Level Three Due Diligence steps, the Compliance Officer or General Counsel should consider:

- The prospective Transaction Partner’s location;
- The extent of the prospective Transaction Partner’s expected interaction with Government Officials or other Covered Recipients;
- Whether any Government Officials or other Covered Recipients are affiliated with the prospective Transaction Partner;
- The structure and terms of the transaction;
- Whether a commission will be paid and the proposed rate of that commission; and
- The red flags identified during earlier due diligence.

The Compliance Officer or General Counsel should consider taking the following steps, as appropriate:

- Engage local counsel, accountants, consultants or other knowledgeable references (e.g., other companies doing business with the prospective Transaction Partner) to provide background information on the prospective Transaction Partner;
- Interview the prospective Transaction Partner’s key personnel;
- Conduct an in-depth investigation of the prospective Transaction Partner with the assistance of internal Company resources or outside counsel or consultants.

In addition, if the Compliance Officer or General Counsel determines that any of the officers, directors, principals, owners, shareholders, or other key personnel of the Transaction Partner is a current or former Government Official, the responsible Company Personnel should determine whether there are any other companies or individuals with equivalent expertise, knowledge, or skills who can perform the proposed work. If there are no other prospective Transaction Partners with the required expertise, the Compliance Officer or General Counsel should consider the following additional due diligence steps:

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- Retain local counsel to ensure that the prospective Transaction Partner’s involvement does not violate any policy of the government entity or local law;
- Include provision in prospective Transaction Partner’s contract that the Government Official will not be involved in the Transaction Partner’s activities connected to the Company’s business;
- Obtain written approval from the Government Official’s government employer of the proposed relationship with the prospective Transaction Partner;
- Interview the Government Official; and
- Interview the Government Official’s superiors.

Future Red Flags: If Red Flags emerge after the Company engages a Transaction Partner, the Company Personnel responsible for that relationship must promptly notify the Compliance Officer or General Counsel. The Compliance Officer or General Counsel should then determine the due diligence steps appropriate to clear the new Red Flags.



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Final Audit Report

2026-02-26


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