



CODE OF ETHICS AND CONDUCT

ISA AND ITS COMPANIES



We are ISA and its companies. Connections that inspire!

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i. **Integrity, the basis of our excellence and performance**

The update of the Code of Ethics and Conduct is an iconic milestone for ISA and its companies as part of the Ecopetrol Group. This document is much more than a behavioral guide; for it is our backbone, the foundation supporting the trust and credibility we have built. The Code sets the tone for our organization by defining the behaviors we expect from everyone and by reinforcing our commitment to integrity.

As members of the Board of Directors, we are proud to lead this initiative for the reinforcement of our ethical culture. We know that clear, cross-sectional, and demanding standards are essential to reflect the principle of integrity. These principles are a compass guiding every choice, action, and command, reaffirming ISA as a pillar of consistency within the Ecopetrol Group.

This Code of Ethics and Conduct is the mirror of who we are as individuals and as an organization. It inspires us to live with integrity and to act with beliefs and enthusiasm, convinced that each of us is essential in building a better country and a more efficient, responsible management. It also drives us to protect the sustainability of our company while making a positive impact on society.

Adhering to this Code involves us deeply reflecting on our commitment to always doing the right thing, choosing the ethical path in every action, and proudly representing this Group. It also invites us to promote inclusive, respectful, and empathetic environments, where collective well-being is the priority.

We invite you to apply these principles in every aspect of your life, to let ethics guide and motivate you every day, and to continue making a difference through your work.



CAMILO ZEA GÓMEZ
Presidente Junta Directiva de ISA

ii. **No excellence is possible without integrity**

As CEO of ISA and its companies, I kindly invite all our employees, partners, and stakeholders to not only comply, but also to firmly apply and promote the principles that guide our Code of Ethics and Conduct.

This Code goes beyond a set of rules: it is a guide that inspires us to act the right way, always with integrity, commitment to life, respect, transparency, responsibility, and honesty. These principles not only define our role in the Group, but also drive us to be an ethical model in our environment. With integrity, we reaffirm our zero tolerance policy against corruption, fraud, bribery, and any conduct that violates the law or the principles we defend.

Transparency is one of our core pillars. We reject any practice that endangers objectivity or fair competition; we condemn conflicts of interest, bribes, and any diversion of the resources aimed at improving our society. We believe in clarity and in always acting honestly.

We are deeply committed to the promotion and advocacy of human rights, inclusion, diversity, and peace in all the territories where we operate. We reject all forms of discrimination, as we work in a place where coexistence is an expression of mutual respect.

I invite you to continue making ethics, transparency, and integrity your driving forces in your daily actions. This is the only way we will continue to transform Colombia through the energy born out of our deepest convictions.



JORGE ANDRÉS CARRILLO CARDOSO

Presidente de ISA

iii. **Be the multiplier that makes the difference**

At ISA and its companies, we understand that our commitment to life, respect, transparency, honesty, and responsibility not only defines us as an organization, but drives us to be better every day. This new Code of Ethics and Conduct is more than a set of guidelines: it is an invitation to apply these principles in every decision, action, and interaction. It is a reflection of who we are and what we want to project into the world.

Being a multiplier means making this commitment more than an individual one by inspiring others to do the right thing, act with integrity, and build relationships based on trust. Together, we can make a real difference, creating a workplace where respect and ethics are the foundation of our actions and the driver of our positive impact on society. You are key to this goal, because when we multiply our principles, we create connections that improve our ability to transform lives and build a sustainable future for all.

A handwritten signature in black ink, appearing to read 'S. Lewis', followed by a long horizontal line extending to the right.

Chief Risk and Compliance Officer

iv. **Introduction**

At ISA and its companies, we are committed to integrity and ethics in every one of our activities, working every day to meet the highest ethical standards.

We know that every decision has an impact and, for this reason, integrity is the guiding point for our daily actions. Our firm commitment to excellence and adaptability to change; the achievement of goals and our purpose; and our ethical, legal, and transparent behavior led us to embrace integrity as a principle contributing to the generation of trust.

We are committed to creating a circle of integrity with our stakeholders by understanding that an end does not justify any means to achieve it, and that ethical business conduct involves a firm stance on what is non-negotiable.

We are motivated to set an example in building a safe, inclusive work environment that recognizes and values diversity as a basic element of clean, respectful, healthy, and constructive interactions.

We believe in the strength of collective work, so that everyone, without exception, assumes the responsibility of adopting the ethical culture and encouraging it in others. We proudly bring the message that together we make it better and that we practice ethics on a daily basis, both inside and outside the organization.

Our Code of Ethics and Conduct invites us to see ourselves as individuals with strong standards, who celebrate individual contributions to a fairer society and who motivate decisions and actions to reflect the consistency that makes a difference.

v. **Recipients of the Code of Ethics and Conduct**

All stakeholders¹ of ISA and its companies, as recipients of this Code, must act pursuant to applicable national and international laws, as well as the guidelines contained herein, which are mandatory and their omission may lead to labor, disciplinary, legal and other consequences.

vi. **Inspiring Leadership**

At ISA and its companies, leadership sets the ethics and transparency tone for our actions. **A leader is a person who stands out for their behavior, inspiring and motivating other people**, leaving their mark, and acting under the conviction that small actions, put together, are transformed into big changes. A leader recognizes the multiplier effect of their actions and works hard to plant the seeds of change and reflection, being a model for those who follow them, generating a positive impact.

This Code empowers **recipients** to exercise each of their roles and actions with respectful, inclusive, and model leadership.

¹ Stakeholder: administrators, employees, suppliers, partners, the State, shareholders, investors, society, communities, customers, and users

It encourages teamwork, is based on empathy, is applied humbly, and invites us to take responsibility for our tasks and work on them with passion and commitment.

Our leadership extends to all walks of life: family, friends, workspaces, personal and work projects; but especially, to how we interact with our environment.

We promote a **chain of examples**, generating an innovative dynamic that allows creating a multiplier effect of ethical behaviors in the pursuance of excellence. All under the premise that a good deed drives good actions, and a good example promotes exceptional behavior. Let our leadership become connections that inspire.

How do we lead by example?

The following are behaviors that are expected from everyone:

- Know, understand, internalize, and promote this Code and apply it with integrity, consistency, and conviction.
- Express knowledge of and commitment to our Code and the Declaration of Conflicts of Interest, as well as adherence to the Guidelines provided by ISA and its companies in terms of ethics and transparency.
- Know and accept the rules and regulations that govern our activities, as well as the ones relating to the prevention of money laundering, financing of terrorism, financing of the proliferation of weapons of mass destruction, fraud, bribery, corruption, and protection of free competition and others that regulate the ethics and compliance behaviors indicated herein.
- Cooperate in internal or external investigations aimed at detecting possible violations of this Code and the code of ethics and conduct for suppliers, contractors, subcontractors, and partners.

While all of us are leaders, there are some additional responsibilities that should be strictly observed by those in charge:

- Expressly communicate to their work teams their duty to act with integrity and to implement the cultural principles of ISA and its companies in the performance of their responsibilities and functions.
- Promote the appropriation of this Code in their teams through regular actions that encourage its understanding and implementation, as well as verify that its contents are applied.
- Monitor the efforts made, in order to verify the application of these guidelines and of the company's internal controls, which are based on the need to mitigate risks.
- Not to retaliate against those who make good faith reports of suspected violations of the Code. Comply with and promote the protection of bona fide whistleblowers.
- Enable and promote the use of the Ethics Line for inquiries, dilemmas, and reports.
- Disseminate and ensure the application of internal guidelines on compliance risks in accordance with the documents adopted by ISA and its companies.

Administrators² of ISA and its companies are in charge of planning, organization, management, and control, as well as strategic decision making and other responsibilities inherent to their management. They must also comply with the obligations attributed by law, the Corporate Bylaws, and the operating regulations of the Board of Directors and its committees, or the corporate body of which they are a part.

Likewise, they shall lead under the concept of “*tone at the top*”.. The tone at the top concept is understood as the appropriation and promotion, at all levels, of the ethical culture that must permeate ISA and its companies. This way, administrators must live and lead, with their decisions and behaviors, the environment for employees and beneficiaries to follow their example.

vii. Our duty and commitment is to abide by the applicable regulatory framework and internal guidelines, and to follow the highest standards

We recognize our obligation to comply with binding national and international laws; however, as excellence is our passion, we are committed to going above and beyond, embracing regulatory compliance and high standards of ethics and compliance.

We challenge ourselves every day to improve our potential while maintaining motivation and implementing cutting-edge knowledge, without ever compromising our integrity.

We invite you to promote integrity and continue to raise the bar beyond what is regulated by this Code. Let's make a difference whenever we can.

viii. Integrity: the baseline and the drivers that build it

Integrity, our floor and our ceiling, is the principle that embodies all of who we are and sets the path that leads us towards our destination. It represents the consistency between what we think, say, and do. The harmony between being and appearing. The transversality of ethics in all areas of our lives. The attribute that comprises the basic principles that make us committed to life, respect, transparency, responsibility, and honesty, acting ethically and being firm when it comes to the non-negotiable.

Integrity has an axiological scope that goes beyond the legal principles established for the different fields (labor, administrative, criminal, disciplinary or fiscal, etc.).

Our ethical conduct is a consequence of our essence and autonomy; it does not result from awareness or fear of a sanction, without prejudice to the fact that non-compliance implies a breach of the ethical or legal framework and their respective consequences.

Integrity reflects a set of characteristics we call drivers.

² Administrators: members of the boards of directors, legal representatives, managers, and those who, in accordance with the laws of the relevant country and the Bylaws of ISA or the respective Company, have the capacity to administrate or direct.

What is a driver?

In the industry, a *driver* is a resource that optimizes the operation of a system and improves its efficiency. Its main function is to transform energy. The drivers of integrity are: commitment to life, respect, transparency, accountability, and honesty.

These drivers provide energy to our ethics and compliance system, as its gearing creates a powerful, transformative dynamic that reaches higher levels, allowing it to flow towards our purpose.

The binding, enforceable integrity drivers focus our journey on the path to excellence. As recipients of this Code, our duty is to follow these drivers:

Commitment to life, implementing self-care actions and following the guidelines aimed at protecting life, safety, health, and the environment.

Respect by accepting and recognizing differences, free of contempt or discrimination based on gender identity, sexual orientation, ethnicity, disability, nationality, origin, level of education, socio-cultural situation, religion, worldview, or other characteristics of diversity.

Transparency by providing clarity, without hiding information and avoiding inaccuracies or vagueness.

Honesty by acting truthfully without deceiving, lying, stealing, and/or cheating.

Responsibility by being reliable, complying with the commitments acquired, acting consistently, and generating credibility.

ix. **Behaviors that protect integrity**

ISA and its companies are all of us. Its greatness comes from the individual contribution of each of us. We are the countries where we operate and where we are present. We are territory and operation, we are planning and strategy.

At ISA and its companies, we seek to protect the respect of human rights and due diligence in the field of our business, as well as the value chain, by implementing compliance procedures. We have instruments in place to guide our management and business activities, and we identify the legal standards set forth in the universal, Inter-American and national human rights systems, which are aligned with the principles, initiatives, and frameworks we adopted voluntarily.

We express our strong, unwavering stance about not tolerating any act aimed at causing harm and, particularly, of any act of corruption. Likewise, we reject any conduct that violates or disregards the ethical or legal framework, as we reject any malicious acts, malicious behavior, and any situation that threatens transparency and violates human rights. We declare our firm purpose to preserve our individual integrity and the integrity of ISA and its companies.

We reject corruption

At ISA and its companies, we have zero tolerance for corruption. When people use power, trust, authority or responsibility, and abuse such position to obtain any undue benefit or advantage for themselves or a third party, they incur in acts of corruption.

We do not engage in facilitation payments, donations, political contributions, diversion of money, or lobbying

At ISA and its companies, we prohibit facilitation payments and the diversion of money for social investment or sponsorships towards political activities or activities unrelated to the purposes established for them.

We prohibit political donations and contributions, as well as any donations contravening the provisions of the applicable laws in each country.

We do not allow direct or indirect payments of money or any kind for lobbying services. Lobbying is understood as payments to influence the decision-making of authorities on matters of interest to the payer. Our engagement with the public sector is in line with the activities of ISA and its companies. Integrity must prevail in this relationship, so any act that may suggest a lack of transparency is forbidden, as well as acts of corruption, bribery, offering or receiving favors, courtesies, gifts, among others.

ISA and its companies neither finance nor promote political parties, or their representatives or candidates, and they do not sponsor seminars or activities aiming at political propaganda. Therefore, administrators and employees cannot use the assets or resources (information systems, internal or external meetings, among others) of ISA and its companies for such purposes.

In those countries where an administrator or employee is allowed active political participation either because of their legal nature or ownership of the company, these actions are to take place in their personal capacity, outside of their work hours, and in compliance with the stipulations above.

We reject bribery in any form

ISA and its companies do not allow: offering, proposing, promising, receiving, accepting, giving, or soliciting undue advantages for any amount, whether in money or in kind (products or services, an offer, or promise to pay for something in the future), directly or indirectly, in exchange for an undue benefit for themselves, for a third party, or for the company, or for a person to act or refrain from acting. This is a form of corruption that seeks to gain unfair advantages or privileges through improper incentives.

When a natural or legal person offers, promises, or gives something of value, such as money or gifts to a foreign public official for their own benefit or the benefit of a third party in order to obtain or retain business or undue advantage in the international business sphere, they commit transnational bribery, also known as foreign bribery. Foreign bribery involves offers to obtain illegitimate benefits in commercial or governmental relationships across national borders.

It is important to clarify that the simple promise or offer is enough to constitute an act of domestic or foreign bribery.

The recipients of this Code comply with the provisions of the FCPA (Foreign Corrupt Practices Act), a U.S. law to prevent acts of transnational bribery and corruption involving foreign public servants by U.S. persons or corporations listed on the U.S. stock exchange, their subordinates, or companies that have a relationship with the United States. The FCPA is applicable even to foreign companies that do not operate in the United States, by the mere fact that they use any U.S. financial, technological, data transmission system, or other means.

We do not accept or offer gifts, courtesies, or entertainment that violate our internal regulations

At ISA and its companies, we recognize that commercially valuable and proportionally reasonable promotional items have brand positioning purposes and that, for the fulfillment of certain functions and tasks, the relationship with counterparties is essential.

We reject any promotional gift, courtesy, hospitality, or entertainment with the potential to affect personal or company integrity, create a perception of lack of transparency, or constitute a bribe or improper engagement, regardless of the amount.

The aim of this guideline is to avoid any situation that may affect the impartiality, objectivity, or independence of an administrator or employee by accepting or giving a gift to themselves, their beneficiaries, or a third party, as well as to preserve transparency and fairness in all processes, decisions, and management of ISA and its companies.

The provisions on giving, receiving, offering or accepting gifts, courtesies, or hospitality can be found in the Corporate Anti-Corruption and Anti-Bribery Guidelines of ISA and its companies.

We prevent money laundering

We do not accept any action to conceal or disguise the illicit origin of money from certain activities such as drug trafficking, corruption, fraud, kidnapping, extortion, human trafficking, among other source crimes, making it appear to have been obtained legitimately.

It is important to know that this crime materializes when money from these illegal sources enters the formal financial system through complex financial transactions to make the illicit money appear legal or legitimate. For example, through financial movements involving different people and multiple bank accounts, which are difficult to trace and track, even passing through different countries, thus complicating detection by the authorities.

We do not fund terrorism

Under any circumstances, we reject the provision of funds, resources, or financial support to groups or individuals engaged in terrorist activities. These activities may include purchasing weapons, investing to plan attacks, training and coaching terrorists, and other actions aimed at promoting terrorism and violence.

We do not contribute to the financing of the proliferation of weapons of mass destruction

At ISA and its companies, we do not accept, provide or allocate funds, resources or financial support to individuals, organizations or countries that seek to develop, acquire or spread weapons that can harm humanity and cause destruction on a massive scale; for example, nuclear, chemical or biological weapons.

The fight against money laundering and the financing of terrorism and the proliferation of weapons of mass destruction involves all of us, as these are latent risks that we must mitigate through due diligence procedures and the implementation of sufficient and appropriate controls.

We manage our counterparties

We recognize that risk management involves carefully evaluating the financial, commercial or legal transactions that involve us, so we know that due diligence is necessary.

We are required to comply with economic sanctions and restrictions imposed by the Office of Foreign Assets Control (OFAC) of the United States Department of the Treasury. Therefore, we all protect the reputation of ISA and its companies, as well as our own integrity, through information analysis before entering into any formal relationship.

United against fraud

Intentional or deliberate deception to obtain any undue, dishonest, or unfair advantage constitutes fraud and is expressly prohibited and enforceable by the recipients of this Code. We do not manipulate, falsify, or misrepresent information to mislead another person. We are required not to participate directly or indirectly in any activity involving fraud and to reject any falsification of documents, misinformation about products or services, manipulation of financial records, among others.

Always transparent and clear

We strongly reject the lack of transparency or clarity in any situation, as it can generate distrust and complicate or affect informed decision making.

We protect free economic competition

We ensure that ISA and its companies compete fairly, loyally and transparently in the market, without engaging in practices that affect the normal functioning of the market, such as: engaging in or promoting agreements that limit free competition, abusing a dominant position in a market, or acting unfairly. Likewise, we ensure that contractual processes are transparent and promote plurality, equal conditions, access to information, and rejection of preferences in the selection of suppliers and contractors.

We manage conflicts of interest appropriately and timely

Administrators and employees are in a situation of conflict of interest when due to their functions they must make a decision, or perform or omit an action, and they are able to choose between the interests of ISA, and their own interest or that of a third party³, so when choosing any of these last two, they would be compromising their objectivity or independence. Third parties in a conflict of interest may include close relatives⁴ of the administrators or employees.

Regarding conflicts of interest, the performance of Administrators and employees of ISA and its companies must be governed by principles of loyalty, abstention, confidentiality, and duty to report any situation of a potential conflict of interest arising from the relationships of the Administrators and employees with their relatives. The following figure illustrates the degrees of consanguinity, affinity, and civil relationship in which conflicts of interest may arise.



A conflict of interest arising from the relationship of a person, administrator, or employee with a third party does not necessarily require some degree of

³Third Party: A contractor, supplier, distributor, consultant, intermediary, shareholder, investor, client, public officer, and in general everyone with whom a commercial, contractual, or cooperative relation is established, as well as family members of Administrators and Employees of ISA and its Companies.

⁴Close Relatives: Spouses or permanent partners or persons with an equivalent personal relationship, family members up to the fourth degree of consanguinity (parents, children, siblings, grandparents, great-grandparents, grandchildren, great-grandchildren, uncles, nieces, nephews, cousins), second degree of affinity (parents, children, grandparents, grandchildren and siblings of the spouse or permanent partner) and sole civil relationships (adoptive parents children).

consanguinity, affinity, or civil relationship to exist. A conflict of interest may occur in any situation where an individual's objective and independent judgment may be overshadowed by their direct or indirect interest, not necessarily economic, in the decision or work entrusted to them. Proper management of conflicts of interest is essential, as it preserves the trust between us and the trust of third parties in the company.

At ISA and its companies, we manage conflicts of interest so that transparency is not affected in decisions, actions, procedures, or objectivity.

We ensure an environment free from violence, sexual and workplace harassment, and workplace violence

Workplace harassment refers to persistent and demonstrable behaviors against an employee, a supervisor, an immediate or middle manager, a co-worker, or a subordinate, aimed at instilling fear, intimidation, terror, and anguish, therefore causing work injuries, demotivation, or the resignation of the victim.

Sexual harassment can be defined as inappropriate sexual advances; demands for sexual favors; or any verbal, nonverbal, or physical conduct of an unwelcome sexual nature inside or outside of the workplace, creating a hostile environment.

Sexual violence entails any aggression or non-consensual sexual conduct causing physical, emotional, psychological, or spiritual harm; for example, sexual abuse, unwanted physical contact, touching, physical approaching, physical sexual harassment, rape, or any other type of sexual coercion.

We strongly reject these behaviors that impact human rights, affecting the well-being, safety, dignity, and integrity of people.

We recognize, respect, and value diversity, equitable participation, and equal opportunities

Any kind of processes and procedures in ISA and its companies must be non-discriminating and must reject any conduct that prevents, obstructs, or restricts the full exercise of rights due to ethnicity, nationality, gender identity, sexual orientation, disability, age, or other diversity traits. Therefore, we encourage you to consider using inclusive language, avoiding words that may be exclusionary, discriminatory, or violent, while recognizing, within the framework of equity, the particular differences and risks to which certain groups may be susceptible.

Through our procedures and practices, we promote a workplace that recognizes, respects, and values diversity in all its forms while encouraging equitable participation in decision-making and equal opportunities for everyone at ISA and its companies.

We develop operations free of occupational accidents and diseases

At ISA and its companies, we protect life in all its forms, promote and comply with OSH guidelines, manage risks with a preventive approach, and stop an activity when we see that conditions change and acts or situations increase the risk of an unsafe or

substandard event. We openly and timely report incidents and investigate them, simultaneously improving our HSE⁵ management system.

We take care of the environment

We are responsible for the planet and it is our duty to act wisely to protect it, as our operations directly impact environmental sustainability. Through preventive and mitigation actions, we recognize and manage impacts to the environment.

We are committed to the environment and to the efficient use of energy and natural resources. We have actions in place aimed at reducing greenhouse gas emissions, pollution, and waste management, which follow applicable environmental policies, standards, procedures, laws, and regulations.

Likewise, we ensure the proper comprehensive management of water in operations, continuously monitoring the effects of climate change. Through the HSE management system, we report the related incidents in a timely manner and maintain clear guidelines on emergency protocols.

ISA and its companies make environmental awareness efforts and strengthen their relationship and dialogue with stakeholders according to the environmental strategy and applicable regulations.

We ensure the integrity of financial information

We act honestly, ensuring accuracy and transparency in the recording and presentation of ISA and its companies' financial information pursuant to national and international standards, accounting principles, and reporting standards. We do not manipulate or distort any type of financial information, so we ensure that shareholders, investors, or any stakeholder receive true information reflecting the financial reality of the companies.

In order to ensure the integrity of financial information, ISA and its companies have an internal control system in place that ensures that the company's assets are handled and administered appropriately and that, with reasonable detail, accurately and correctly reflects the transactions and uses of the company's assets.

All the employees of ISA and its companies are part of the internal control system, and we strictly comply with the controls under our responsibility, so that the accuracy of the financial statements can be certified to auditors and government authorities who require it.

All financial information to be reported internally or externally must follow the applicable regulations against the disclosure of relevant and non-relevant information, be accurate, and ensure completeness and precision. Therefore, any errors should be reported immediately. Accounting records will be supported in a secure, reliable, and systematized manner.

We properly use the resources of ISA and its companies

⁵ HSE: Workplace Health, Safety, and Environment

The company's resources include equipment, materials, information, services, among others, which we use efficiently and effectively for work and not for personal purposes.

Additionally, the resources involve the benefits granted to employees, which must be obtained and used following ISA and its companies' requirements.

We recognize that the assigned technological equipment and the information stored in them belong to the company; therefore, they must be used for corporate purposes. We manage assets responsibly, maintaining their value, and making the most of them to generate revenue and profits without breaching ethics and fair use.

We recognize our duty to comply with guidelines on the use of licensed software and do not download tools without following the guidelines defined for this purpose.

We protect resources against loss, damage, or misuse and use them to meet goals, following company-defined guidelines. We recognize that improper use of these resources may result in disciplinary, employment, criminal, and/or tax penalties.

Our businesses are transparent and objective

At ISA and its companies, our procurement business and processes are honest; transparent; and in compliance with applicable laws, regulations, and internal procedures.

We act fairly, knowing and respecting the clauses, terms, and procedures agreed. We do not decide, engage in, or manage any situation when our objectivity, impartiality, or independence is compromised. We treat all parties to the processes in an equitable, respectful, and fair manner.

Under no circumstances do we directly or indirectly allow, encourage, endorse, tolerate, or engage in any act that could involve bribery, affected competition, corruption, or misconduct that might compromise the validity of the business or contract.

We protect bona fide whistleblowers

At ISA and its companies, we recognize the importance of having reliable complaint mechanisms and, in this regard, we protect bona fide whistleblowers so that they do not fear retaliation after reporting facts or situations that possibly go against the ethical or legal framework. Therefore, we are strongly committed to ensuring, in addition to the confidentiality and anonymity of the whistleblowers, an environment of tranquility and trust where raising one's voice cannot be subject to any adverse consequences.

We respect human rights (HR)

At ISA and its companies we actively know, respect, and promote human rights by:

- Compliance with applicable local and international standards regarding fair labor practices and human rights, including prohibitions on forced labor or child labor.
- Voluntary joining the United Nations Global Compact, an initiative that promotes the commitment of the private and public sectors and civil society to align their

strategies and operations through ten universally accepted principles in four areas: human rights, labor standards, environment, and anti-corruption.

- Inclusive understanding and dialogue to contribute to the development of communities considered allies of our work.
- Identification and prevention of risks and, when necessary, mitigation and remediation of negative impacts from operations on populations.

We share the belief that business practices that ensure respect for human rights contribute to achieving a more stable, equitable, inclusive global market that fosters more prosperous and developed societies.

We ensure the protection of personal data

We recognize that confidentiality is a fundamental right aimed at protecting the privacy and personal data of information holders. Personal data refers to any information that is linked or can be associated with one or more specific or determinable persons. This includes information that can identify us, such as our name and ID number, or location, gender, medical, or financial information. ISA and its companies act in accordance with the applicable laws in each of the countries of operation.

We recognize the special care required for the processing of private or sensitive data. Some examples of the latter are medical history, sexual orientation, participation in trade unions, or information related to minors, among others. Information associated with a victim status or inclusion and diversity aspects are sensitive data. Respect, one of the drivers of integrity, motivates us to properly process the personal data under our responsibility within the framework of our activities. Each department is responsible for the information it handles and, if it includes personal data, it must be treated appropriately.

Therefore, we apply the principles for processing personal data such as restricted access and circulation, security and confidentiality; as well as the principles of purpose and freedom, and others indicated by law. Its application is essential to safeguard data against any form of damage, theft, loss, access, or improper or unauthorized use.

We protect the confidentiality of information

The information of ISA and its companies must be protected against internal and external threats that may compromise its integrity, confidentiality, and availability.

We recognize the strategic value of our information and, therefore, we adopt mechanisms for the protection of processes, technology, and people. This means that we must adopt measures and procedures to maintain security and prevent loss, leakage, intrusion, and cyberattack.

The confidentiality of information is essential to prevent the disclosure to unauthorized parties of any information that is not public; to this extent, we must adopt the specific legal standards and the internal regulations to ensure that it is treated accordingly. Each department of the companies has the duty of properly managing the confidential information under their responsibility, ensuring aspects such as its classification, risk analysis and treatment implementation plan, etc. Teamwork with the departments supporting document management and cybersecurity is key.

Remember that our duty to protect information remains even after no longer being linked to ISA or any of its companies. It is prohibited to use confidential information for your own benefit or for the benefit of third parties.

We use artificial intelligence (AI) ethically and responsibly

We promote the timely and responsible implementation of artificial intelligence (AI) solutions, as they can leverage the response to many needs of ISAs and their companies. While we recognize its advantages, we know that AI must be used responsibly, safely, ethically, and in a way respectful of the human rights that might be impacted by it. This approach is ratified by international best practices.

We focus on the human aspect as the core of decision-making, so that technology, however powerful and sophisticated it may be, remains as a support element.

We do not use inside information in stock trading (*insider trading*)

As administrators and employees of ISA and its companies, we must refrain from buying or selling directly or indirectly through an intermediary; or recommending to third parties, buying, or selling stocks of any of the companies based on inside, reserved, or internal information of ISA or the respective company to which it has access due to its relationship, and which is not available to the general public. We must also refrain from doing so from the moment we become aware that relevant transactions are being carried out, such as a Public Offering for Acquisition (OPA), mergers or spin-offs until the transaction has ended and the closing of the transaction is reported to the general public.

The purchase or sale of stocks with inside information implies having unfair and improper advantages and affects the confidence of other shareholders or potential shareholders, as well as the transparency of public markets.

We recognize the prohibition on trading stocks during blackout periods.

We are responsible to territories and society

Since the Business Group to which we belong is a generator of social value in the territories where we are present; and recognizing that, as a company, we have a great responsibility to contribute daily to society through our actions and contributions, we are committed to support territorial development and business sustainability along the entire value chain and the Group's business lines through the responsible management of natural resources, the construction of relationships of trust with stakeholders, and investments to generate collective prosperity. For this reason, we strive and work to generate value in the territories where we are present, ensuring the well-being of the communities and those around us.

We are committed to the well-being of our stakeholders

Our ethical culture invites us to treat all our stakeholders with respect, empathy, justice, and dignity. For this reason, we are honest, assertive, clear, and consistent. We recognize that stakeholders are proxies of our mission and, through our relationships and our own scope, we work on ISA and its companies' strategy within the framework of the general guidelines of the Ecopetrol Group and the generation of trust. We strive to recognize needs, expectations, and opportunities in interactions with stakeholders, engage in open and ongoing communication channels, fulfill our value promise, and contribute to the achievement of the strategy and the well-being of society and our stakeholders.

We cooperate with authorities and external and internal investigations

Recipients of this Code must cooperate transparently in the development of internal or external investigations to detect potential violations of this Code, the Constitution, and the law applicable to each country.

We actively support the provision of information requested by the control entities or the areas linking us to any of them and ensure that our answers are complete, truthful, conducive, and consistent.

We are committed to service excellence

We are committed to guaranteeing quality standards in our services and to maintaining the channels and relationship mechanisms with customers so that they can express their needs, expectations, and perceptions about products and services.

We recognize and respect the right of association

We recognize the right of free association of our employees and respect their participation in any type of collective bargaining. We do not discriminate against anyone participating in these associations. We understand and respect the legal framework that supports them.

x. Red flags

If we identify any of the following situations that may create a risk to the company or violate this Code, we must address it and report it to the Ethics Line:

- **Unusual or suspicious financial transactions:** whenever we know or have doubts about excessive or unjustified payments, irregular invoicing, payments

lacking the corresponding approvals, money transfers to suspicious bank accounts or with no clear contractual commercial justification, or financial movements not supported by proper documentation.

- **Due diligence results evidencing situations putting ISA and its companies or other companies of the Ecopetrol Group at risk:** whenever sanctions containing prohibitions or limitations on business and transactions with certain countries, including individuals and entities, are evidenced after due diligence, a detailed analysis must be made for assertive decision-making with a risk-based approach.
- **Questionable or unclear relationships with suppliers and contractors:** the contracting of suppliers or contractors without a transparent process, close relationships with companies or individuals known for corrupt practices, or contracts entered into with companies linked to government officials or influential individuals without clear justification.
- **Poor accounting records and internal controls:** all financial information to be reported internally or externally must be correct and ensure completeness and accuracy; therefore, any errors must be reported immediately. Every transaction must be carried out according to the corresponding procedures and powers and recorded accurately and correctly in the books. Accounting records must be supported in a secure, reliable, and systematized manner. Likewise, the lack of timeliness and proper execution of controls could result in not detecting deviations, difficulty in monitoring, and ineffective controls, impacting the opinion on ISA and its companies' internal controls.
- **Excessive gifts, courtesies, hospitality, or entertainment:** If we detect that any administrator, employee, or beneficiary of ISA and its companies receives or accepts gifts, courtesies, hospitality, or entertainment from any counterparty outside the established guidelines, we must raise a red flag since these practices could seek to influence commercial, contractual, or governmental decisions. Even the mere offer of gifts, courtesies, hospitality, or entertainment by any counterpart or public servant is a red flag.
- **Lack of transparency in operations:** all operations must be transparent, reasonably justified, and verifiable. Failing to carry out operations as indicated, or unjustified refusal to disclose or provide relevant information regarding commercial, financial, investment operations, relationships with counterparties, ownership structures, agreements, contracts, or approaches, must be informed or addressed in a timely manner, as these are potential attempts to conceal illegal activities.
- **Previous history of corruption or legal sanctions:** when any administrator or employee enters into a relationship with a natural or legal person who has been subject to previous sanctions for corruption or legal sanctions, or appears on any restriction or control list, a detailed review and a risk-based approach for the corresponding actions and decisions is required, always prioritizing the best interest of the company.
- **Unreported conflicts of interest:** if you detect any situation suggesting a conflict of interest that has not been reported following with the corresponding instructions, you must notify the Chief Risk and Compliance Officer or whoever acts as such in each company. Although a relationship that suggests a conflict of interest is not a reproachable situation or a red flag on its own, not reporting it or refraining from acting or addressing it does affect the transparency and integrity of ISA and its companies. Therefore, we must recognize this red flag and, likewise, our commitment to report and address the conflict.

- **High-risk jurisdictions (restricted jurisdictions, or jurisdictions recognized for their high level of corruption):** when entering into relationships with a counterparty, appropriate risk management and assertive decision-making involves analyzing the different conditions for the level of risk to be reasonably established. The presence of a counterparty in a country classified as non-cooperative against money laundering and terrorism financing is a red flag that should be considered. Likewise, deeper analyses must be carried out regarding the need and inherent risks of conducting business in countries recognized for their high level of corruption, or when counterparties are located in these countries.
- **Inadequate or undocumented relationships with public or government officers:** in ISA and its companies, relationships with public officers follow strict standards of legality, transparency, and necessity. Interactions should be documented, emphasizing a justified reason for them. Any suspicion of any undue payment, direct or indirect, must be reported through the Ethics Line.
- **Anti-competitive business practices:** At ISA and its companies, we reject any act that may involve a restrictive or anti-competitive practice. Any signal of preferential conditions, disclosure of confidential or early information to a single bidder or competitor, or any situation that may represent one of these practices must be alerted for the corresponding internal review.
- **Cash payments:** as a general rule, at ISA and its companies we do not make cash payments. Exceptions apply in special cases, in accordance with internal regulations. This must be in line with the risks of money laundering, terrorism financing, and financing the proliferation of weapons of mass destruction. Any type of cash payment should be considered as a red flag.
- **Refusal by counterparties to provide information or lack of transparency in corporate structures:** Counterparties pursuing a contractual relationship with ISA or any of its companies must disclose the requested information. When the counterparty refuses to provide such information, especially regarding its final beneficiaries or associated companies or when there are complex structures that make it difficult to identify their structure, special attention must be paid.
- **Transactions with tax havens:** if you detect any financial transaction with countries known for their lack of tax regulation or transparency, this should be considered a red flag, potentially indicating the intention to hide the origin of illicit funds.
- **Transactions with Politically Exposed Persons (PEPs):** people under this category may pose a risk. Thus, individuals who hold political office or are associated with senior government or public officers require a detailed risk analysis and appropriate checks to mitigate such risks.
- **Absence of compliance policies and procedures by counterparties:** ISA and its companies have a strong business ethics and compliance program in place to address associated risks, as well as risk management and internal control. To protect the reputation of ISA and its companies and to prevent and mitigate other consequences, counterparties are expected to have strong compliance programs allowing an appropriate approach when it comes to exposure to risks. The lack of internal controls, provisions, policies, procedures, or other corporate documents may indicate vulnerability to these activities and should be considered an important red flag.

xi. You are part of the solution

We understand the importance of fostering environments guided by the principle of integrity and the power of people to alert the company when situations violate our ethical and compliance guidelines.

When we have questions and concerns, detect red flags, or learn information about a questionable situation or misconduct involving a recipient of this Code, we must report it immediately in a detailed, accurate manner to facilitate verification and effective response.

We are bona fide whistleblowers; we do not make accusations that are false or for revenge or retaliation purposes.

We must keep in mind that we are not alone in this commitment and to raise our voice, we count on the **Ethics Line**, a reliable, easily accessible tool for the deterrence, detection, and prevention of inappropriate behaviors or violations of this Code of Ethics and Conduct or the code of ethics and conduct for suppliers, contractors, subcontractors, and partners. This channel is operated by external independent third parties, who provide us with total transparency in the process.

xii. We focus on prevention

The focus of our ethical culture and, therefore, of our Code of Ethics and Conduct, is on prevention rather than punishment. Understanding this, we strive to communicate and educate in a periodic, effective, timely, and dynamic manner on the guidelines, best practices, procedures, and documentation of the business ethics and compliance program. This program compiles the regulations for us to ensure legal requirements and high standards.

Using the right preventive tools, we can mitigate risks in a coordinated manner and make assertive decisions, in addition to avoiding situations that lead to verifications, investigations, and sanctions.

Although our commitment is to educate, transmit knowledge, provide tools, and communicate, not knowing the guidelines does not exempt us from the responsibility of acting in accordance with them. Your knowledge is key.

xiii. Behaviors that promote our principle of integrity

Examples of acting with integrity include:

- We talk about the company's ethical culture in our personal environment and invite our family and friends to apply the same values.
- Our decisions are objective and consistent with the Code of Ethics and Conduct.
- We demonstrate accuracy and reliability in all our reports, figures, and information we produce, both internally and externally.
- We are honest with the use of economic resources, using them only for their original purposes when granted, and strictly complying with internal guidelines.

- We make ethical, responsible, and careful use of AI platforms, so as not to plagiarize or infringe intellectual property. We have the organizational permissions required to implement AI in the optimization of our processes.
- We do not disclose confidential information of the company, employees, contractors, family members, or anyone involved with ISA and its companies.
- We take care of the inventories of goods and warehouse items so that they are used rationally, in accordance with process needs.
- We respect sexual orientation and gender identity, being careful with their personal life and the use of their pronouns.
- As employees, we use the benefits to which we have access efficiently, responsibly, and legally.
- We promote and contribute to fostering an emotionally safe space free of discrimination, violence, or harassment.
- We adhere to working hours and ensure carefulness and diligence in all our activities.
- We identify hazards, assess risks, and implement barriers and controls. We ensure the confidentiality of information related to recruitment processes assigned to us and do not directly or indirectly disclose any information classified as confidential or privileged.
- We ensure that due diligence is exercised prior to entering into commercial or legal relationships with third parties, in order to know the counterparty in detail to prevent risks.
- We rigorously exercise the controls under our responsibility to prevent the materialization of risks for the company. Internal controls are designed to protect our operations. Therefore, we are all part of the internal control system.
- We ensure that we have received the informed consent of the individuals providing personal data as requested, and we process such information responsibly.
- We respect the good name and honor of people, therefore; we do not report untrue facts.

Above all, we act responsibly by carefully and consciously exercising our role as the first line of defense, in accordance with the control architecture. This means that those of us who are part of ISA and its companies are responsible for carrying out our daily tasks with commitment, thoroughness, and attention to detail, and for identifying, evaluating, handling, controlling, and communicating the risks to which we are exposed. This empowers us to achieve the effective management and promotion of the culture of control that we must preserve. Risk management makes it possible to prevent risks from materializing, generating adverse consequences, or to mitigate them.

xiv. **Our legacy: a strong commitment to society**

At ISA and its companies, we generate social, economic, and environmental value, which encourages us to consolidate an ethical, transparent commitment based on the trust of all our stakeholders. Without that trust, we would not be sustainable.

By virtue of our influence, based on the principle of integrity, we strive to promote an ethical culture and inspire everyone to base their relationships on transparent actions for the common good.

We seek to act as agents of change by promoting and driving social transformation in all the territories where we are present; being a role model; bringing the message and the capacity for stakeholders to acquire and adopt the behaviors that represent us; and ensuring reciprocal relationships with high standards of transparency, justice, and responsibility.

xv. **Making decisions with integrity**

Although ethics have no nuances, we can face situations that cause doubts about how to approach them assertively based on the principle of integrity.

In addition to submitting the consultation to the Ethics Line, the following guiding questions allow us to challenge our stance before making a decision or acting, as they provide us with the most appropriate tools to act in a consistent, transparent manner and to be proud of ourselves for standing up for our name:

- What would a close family member or someone I admire say about this situation or my decision?
- Have I compared my decision or action with the provisions of this Code or internal procedures? Am I compliant?
- Do I feel my decision is right?
- Does this decision or action give me peace of mind?
- Do I feel any pressure to make this decision or act this way?
- Are the reasons or justifications for my decision or action transparent, clear, and auditable?
- Do I have any personal interest, direct or indirect, in this decision or its outcome?
- Do I know the effects and consequences of the decision?

In addition to these questions, when you are about to make a decision, it is important to take a break. Apply the PARA model for applying critical thinking in all your decisions.

Decision Making Process – PARA (*Pause, Analyze, Reflect, Act*) model



Pause – It is our ability to pause before taking a step in certain situations or when making decisions. This stage allows us to identify the situation that gives rise to doubts in the face of the information overload and the multiple daily tasks. It is important to stop and take the opportunity to look for the necessary information for a proper analysis and to think better.

Analyze – In this stage, we can open our minds to apply technical and empirical knowledge to decision making. When analyzing, we use a logical, detail-oriented thinking system to consider variables and different perspectives, even for decisions for which we do not have all the information. In this stage, we must thoroughly analyze the situation, its context, the applicable legal framework, and organizational standards and procedures.

Reflect – As we reflect, we can assess the situation to determine whether we think it is fair, right, and relevant, in line with our organization's principles and values, including integrity and its drivers.

Act – In this last stage, we can take appropriate actions according to the situation or decision, but with the peace of mind that our decisions have undergone a process of thought and reflection.

xvi. Code enforcement FAQs

1. Do my beneficiaries need to know and comply with the Code of Ethics and Conduct?

Yes, the Code of Ethics and Conduct is also aimed at the beneficiaries of ISA and its companies' employees.

2. How long does it take to get an answer to a query, dilemma, or complaint?

Response times are defined in the internal regulations applicable to the management of ethical issues.

Once a query has been reported or submitted, a follow-up number should be consulted regularly to see if further information is required or if more information is provided.

It is essential to clarify that results of verifications can only be disclosed to the relevant authorities or entities.

3. What would be the applicable process if I am investigated for breaching the Code of Ethics and Conduct?

Regarding violations of the Code of Ethics and Conduct, the ethics committee of each company, or the relevant body, carries out a verification process in accordance with internal procedures. Depending on the type of violation and the severity thereof, the adoption of preventive or corrective actions will be recommended.

4. What is the difference between sexual harassment and workplace harassment?

There are several differences. The first one is the purpose of each of these unethical behaviors. Sexual harassment has non-consensual sexual purposes in the personal or work environment, while workplace harassment seeks to instill fear, demotivation, induction to resign, among other types of pressure that may affect the work environment or labor relationship.

5. Is the Code of Ethics and Conduct applicable after working hours?

Yes. Integrity involves consistency and harmony in all areas of our lives, even when we are not being observed. Being part of ISA and its companies requires us to behave ethically everywhere and at all times. However, it is important to consider that any conduct to be verified by the Ethics Line and analyzed by ISA or any of its companies must be framed within one of the classifications defined by ISA and/or the respective company.

6. What should I do if I experience a conflict of interest?

Whenever an administrator or employee is faced with a conflict of interest, they must report the situation through the internal mechanism defined for this purpose. In addition, the person must refrain from participating in the corresponding activity and decision-making process until the situation is analyzed.

Each year, employees must submit a conflict of interest declaration. Likewise, during the year when any doubt or conflict of interest arises.

7. How do the Ethics Lines of ISA and its companies operate?

The ethics lines are operated by an independent company specialized in the design and development of software solutions for ethics and compliance matters.

The purpose of having independent operators is to guarantee a neutral, impartial, reliable, secure channel, available at all times, allowing anonymity and guaranteeing the confidentiality of information.

The response to dilemmas and queries, as well as verifications, are the responsibility of the compliance departments of ISA and its companies.

8. What should I keep in mind when I receive an invitation to attend events or trainings promoted by bidders, suppliers, or contractors?

In line with our principle of integrity and the drivers that define us at ISA and its companies, as well as the guidelines for the policy on courtesies and gifts, we

recommend to anyone who is invited to an event held by a contractor company to ask themselves the following questions before attending or authorizing an employee to attend:

- Does the invitation received relate to the purpose of the contract, its performance or any of the roles defined in the procurement process? Or is it a social invitation?
- Does the purpose of the invitation fall within the scope of the technology transfer/know-how clause of the contract with that counterparty?
- Is the contractor's or bidder's invitation related to a new product, tool, or technology?
- Is the invitation aimed at offering goods or services corresponding to commercial matters that, in the future, may involve ISA and its companies?
- Do I have a personal, friendship, or business relationship with the legal representative or contact person of the inviting contractor?
- Is the contractor's or bidder's invitation directly related to the business, method of choice, contract, service order, procedure, or action or decision that I must participate in or approve?
- Have I been linked or do I intend to be linked to the contractor or bidder issuing the invitation?
- Prior to this invitation, have I declared conflicts of interest with the organizing contractor or bidder?
- Does the purpose of the invitation received lead to an obligation by ISA and its companies or an expectation by the bidder or contractor to contract its goods or services?
- Can the goods or services subject of the invitation be added to an ongoing contract?
- Do I have any contractual duties with this contractor? Am I an authorized officer, requesting officer, monitoring officer, planner?

If the answer to these questions involves any compromise or affects independence, objectivity, or impartiality in decision-making according to the roles and responsibilities assigned to you, please refrain from accepting.

In case of any doubt we should consult the internal regulations and, should these guidelines not resolve it, a query should be made through the Ethics Line of ISA and its companies.

9. Can I pay a State entity to expedite a procedure?

No, as these payments are known as facilitation payments and are prohibited in ISA and its companies, however small they may be.

10. Can I target the conditions of a selection method to favor the selection of a particular bidder?

No. In this case, free economic competition would be affected because objectivity, independence, and equal opportunities for all bidders would not be guaranteed.

11. Can I share information related to the company's business opportunities?

No. Information on prices, quantities, and qualities of goods produced, business strategies or other competitive variables is confidential and under no circumstances should it be shared with third parties. Sharing confidential information may facilitate agreements between competitors or concerted or parallel practices, that is, anti-competitive practices.

12. Can ISA and its companies sponsor an event?

Yes. Sponsorships, contributions to social investment, and donations that do not have political purposes are allowed and can be made as long as they comply with the relevant corporate regulations. To prevent such legal activities from being used for political purposes, a strict due diligence process must be carried out in order to know the recipients, their activities, operations, business, or beneficiaries, as well as to adhere to the internal procedures and approval entities assigned for this purpose.

13. Can I post on my social networks content related to business opportunities in which ISA or its companies or other Ecopetrol Group companies are involved?

No. Employees are bound by the principle of confidentiality of information, so we are prohibited from publishing, disseminating, or disclosing confidential or reserved information by any means, including digital media.

xvii. We are proud of our constant cycle of improvement

At ISA and its companies, we face the daily challenges of transformation, innovation, and change, the core of our business.

Our optimistic journey to keep contributing to the development, prosperity, and improvement of the lives of those who consider this THEIR COMPANY, is the reflection of common efforts towards social wellbeing. In the process of growing, faced with so many changing variables, we can make mistakes, but we cannot act recklessly.

The process of learning inevitably involves mistakes, overcoming, and new attempts; however, it must never involve malicious intent or behaviors deliberately aimed at deceiving or harming. Therefore, to preserve integrity and trust within the organization, we strongly emphasize that ISA and its companies promote safe environments; assertive risk-taking; and development as individuals, employees, and teams. We do not encourage actions or decisions that affect our integrity, no matter who they come from or what their impact may be. With energy and optimism, we declare our commitment to what makes us unique as part of a Group that accompanies the growth of the regions, based on the principle that the path to reach our goal is one of transparency, ethics, and legality.