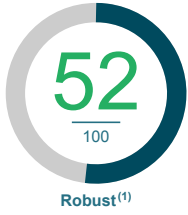


## Company and Sector Performance

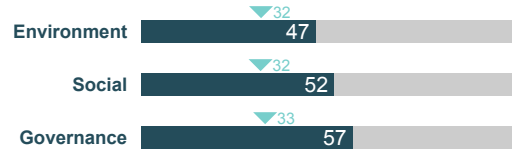
### ESG OVERALL SCORE



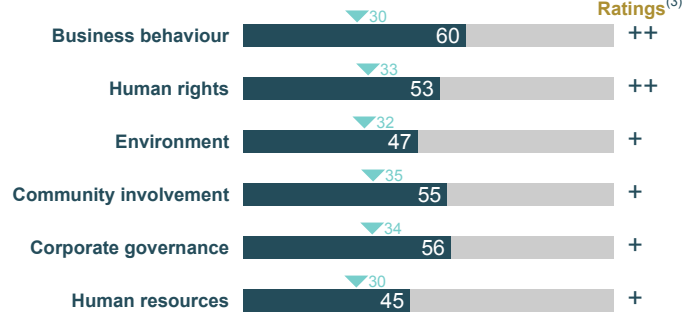
Information rate	77%
sector average	57%
Cooperation level <sup>(2)</sup>	Not responsive
High severity controversies	Yes
Rank in Sector	1/38
Rank in Region	8/890
Rank in Universe	199/4453



### ESG PERFORMANCE (/100)



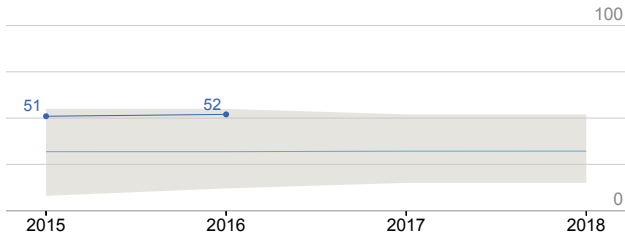
### 6 DOMAINS PERFORMANCE (/100)



Company inclusion in Vigeo Eiris indices<sup>(4)</sup>: Yes

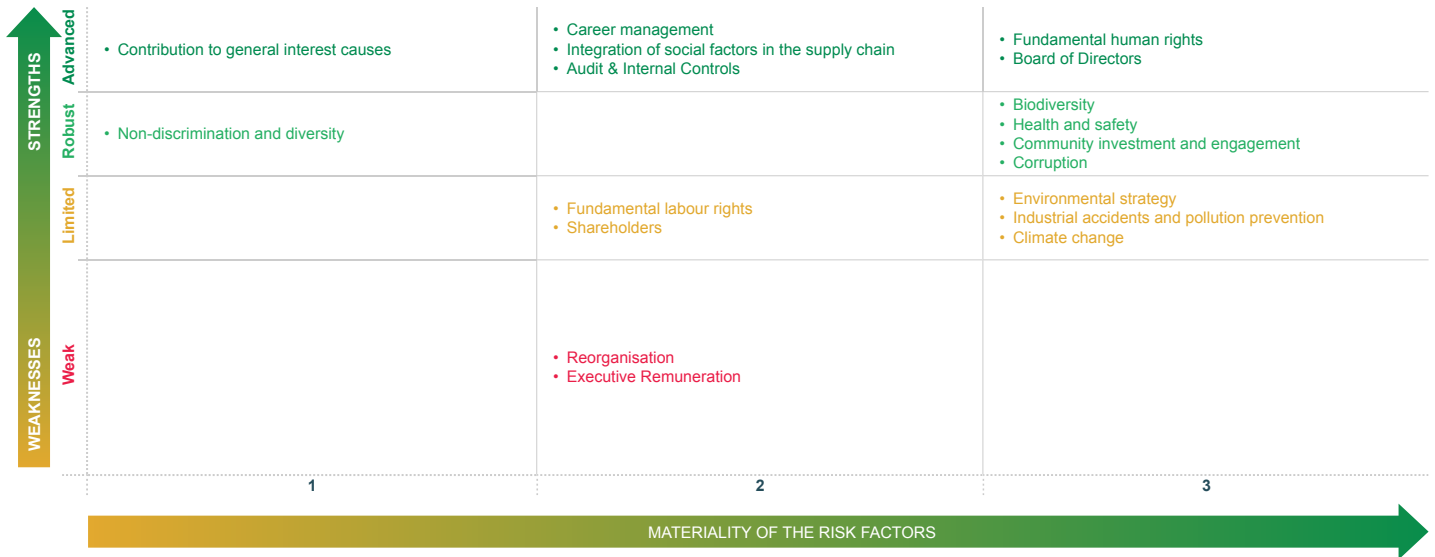


### HISTORICAL PERFORMANCE

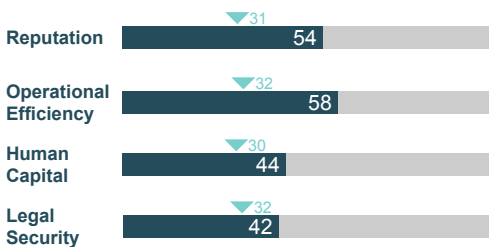


## Management of risks and opportunities

### MATERIALITY & PERFORMANCE MATRIX



### RISK MITIGATION INDEX (/100)



### ANALYST FOCUS

Analyst Focus is not available at this time

## Carbon Footprint and Energy Transition\*

"The Carbon Footprint & Energy Transition research provides an assessment of a company's carbon footprint combined with the strategy to manage risks and opportunities related to the transition to a low carbon economy. NI (No Info) is used to indicate that the information is not available."

### CARBON FOOTPRINT



SCALE	EMISSIONS (T CO2 EQ)	CATEGORIES
A	<100 000	Moderate
B	>= 100 000 and <1 000 000	Significant
C	>= 1 000 000 and <10 000 000	High
D	>= 10 000 000	Intense

### ENERGY TRANSITION SCORE



ENERGY TRANSITION SCORE	CATEGORIES
60-100	Advanced
50-59	Robust
30-49	Limited
0-29	Weak

## Goods and services contributing to sustainable development\*

"Sustainable Goods & Services research provides a positive screening on companies to identify business activities devoted to sustainable solutions."



INVOLVEMENT	CATEGORIES
>=50%	Major
20-49%	Significant
0-19%	Minor
0%	None

## Involvement in controversial activities\*

"The Controversial Activities research provides screening on companies to identify involvement in business activities that are subject to philosophical or moral beliefs."

Involvement in controversial activities: Not available in this version

### Screened Areas:

- Alcohol
- Animal welfare
- Chemicals of concern
- Civilian firearms
- Fossil fuels
- Gambling
- Genetic engineering
- High interest rate lending
- Military
- Nuclear power
- Pornography
- Reproductive medicine
- Tobacco

For more information please contact us at [customer.service@vigeo-eiris.com](mailto:customer.service@vigeo-eiris.com)

(1) Performance level: weak (0-29/100), limited (30-49/100), robust (50-59/100), advanced (60-100/100)  
 (2) Cooperation level on a 4-level scale: proactive, responsive, partially responsive, not responsive  
 (3) Ratings outline companies' benchmarked domain performance within a sector, on a 5-level scale: "-", "=", "+", "++", "+++" (4) Indices: based on the most recent indices at the date of publication. More details on vigeo-eiris.com.

Company performance in all the Sustainability Drivers

Weight		Overall score 52/100			Trend	Score	Leadership	Implementation	Results
		<b>Environment</b>			↗	47	51	43	35
E	ENV1.1	3	Environmental strategy		↘	48	76	20	N/A
E	ENV1.2	3	Industrial accidents and pollution prevention		↗	42	30	31	65
E	ENV1.4	3	Biodiversity		↗	57	65	53	54
E	ENV2.2	3	Climate change		↗	40	32	69	19
		<b>Human Resources</b>			↘	45	55	39	41
S	HRS3.2	3	Health and safety		↗	56	88	48	32
S	HRS2.3	2	Reorganisation		↘	12	0	0	35
S	HRS2.4	2	Career management		↗	63	62	66	60
		<b>Human Rights</b>			↘	53	72	46	42
S	HRT1.1	3	Fundamental human rights		↗	65	79	51	65
S	HRT2.1	2	Fundamental labour rights		↘	34	58	30	15
S	HRT2.4	1	Non-discrimination and diversity		↘	57	79	65	28
		<b>Community Involvement</b>			↗	55	52	82	30
S	CIN1.1	3	Community investment and engagement		↘	52	55	83	18
S	CIN2.2	1	Contribution to general interest causes		↗	62	41	79	65
		<b>Business Behaviour (C&amp;S)</b>			↗	60	62	66	52
G	C&S3.1	3	Corruption		↗	57	72	67	32
S	C&S2.4	2	Integration of social factors in the supply chain		↗	65	48	65	81
		<b>Corporate Governance</b>			↗	56	71	50	49
G	CGV1.1	3	Board of Directors		↘	72	76	69	72
G	CGV2.1	2	Audit & Internal Controls		↗	71	84	65	65
G	CGV3.1	2	Shareholders		↘	47	77	39	26
G	CGV4.1	2	Executive Remuneration		↗	28	43	18	22

■ Weak (0-29/100)    
 ■ Limited (30-49/100)    
 ■ Robust (50-59/100)    
 ■ Advanced (60-100/100)



Involvement in allegations



Involvement in allegations with evidence of corrective measures

Benchmark  
Position versus sector peers

Position versus sector peers		Environment	Human resources	Human rights	Community involvement	Business behaviour (C&S)	Corporate governance	Overall Score
<b>COC04PA00016</b>	<b>Ecopetrol</b>	<b>+</b>	<b>+</b>	<b>++</b>	<b>+</b>	<b>++</b>	<b>+</b>	<b>52</b>
HU0000153937	MOL	++	++	++	++	++	=	51
INE910H01017	Cairn India	++	++	+	+	=	+	48
INE002A01018	Reliance Industries	+	=	+	=	+	+	45
PLLOTOS00025	LOTOS Group	+	+	+	+	+	=	44
ZAE000006896	Sasol	=	++	+	=	+	++	44
TH0796010R11	Thai Oil	=	+	+	+	+	=	40
INE213A01029	Oil & Natural Gas Corporation	+	=	=	++	=	=	39
PLPKN0000018	PKN Orlen	=	=	=	=	+	+	39
RU0006944147	Tatneft	+	+	=	+	=	=	38
TH0646010R18	PTT	=	=	=	-	+	+	37
TH0355010R16	PTT Exploration and Production	+	=	=	=	=	+	37
TRATUPRS91E8	Tupras	=	=	+	+	+	=	37
KR7010950004	S-Oil Corporation	+	=	=	=	+	=	36
TRAKCHOL91Q8	KOC Holding	=	=	+	=	+	=	35
BRPETRACNOR9	Petrobras	+	=	=	=	-	=	35
US3682872078	Gazprom	=	=	=	-	=	=	34
CNE1000003W8	PetroChina	=	=	-	+	=	=	34
RU000A0J2Q06	Rosneft Oil	=	=	=	=	=	+	34
KR7096770003	SK Innovation	=	=	+	=	=	=	34
XS0456477578	Petroleos Mexicanos	=	-	++	=	=	=	33
XS0799658637	KazMunaiGaz	=	=	-	-	-	+	31
US6698881090	NOVATEK	-	=	=	-	+	=	31
INE029A01011	Bharat Petroleum Corp	=	=	=	=	-	-	29
CNE1000002Q2	China Petroleum & Chemical	-	-	-	-	-	=	27
HK0883013259	CNOOC	-	=	=	=	-	=	27
BMG5320C1082	Kunlun Energy	-	-	-	=	=	-	27
US69343P1057	Lukoil	=	-	-	=	-	=	27
PLPGNIG00014	Polskie Gornictwo Naftowe i Gazownictwo	=	=	-	-	-	-	27
CNE1000004C8	SINOPEC Shanghai Petrochemical	-	-	-	=	-	=	26
BROGXPACNOR3	OGX Petroleo e Gas	-	-	=	-	=	-	23

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Position versus sector peers		Environment	Human resources	Human rights	Community involvement	Business behaviour (C&S)	Corporate governance	Overall Score
	Participacoes							
MA0000010803	Samir	=	=	-	-	-	--	20
US8688612048	Surgutneftegas	-	-	--	-	-	-	19
MA0000010951	Afriquia Gaz	-	-	-	--	-	--	18
TW0006505001	Formosa Petrochemical	-	-	-	-	-	--	17
XS0605559821	IPIC	--	-	-	-	-	--	17
KR7078930005	GS Holdings	-	--	-	--	-	--	15
MA0000012262	Total Maroc	-	--	-	--	-	--	15

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## General information

Ecopetrol S.A. is an integrated oil and gas company engaging in exploration and production activities in Colombia, where its extraction fields are located, and abroad, as well as in the transportation and marketing of crude oil, motor fuels, diesel and biofuels among others.

Ecopetrol also engages in refining and processing activities to produce fuels, petrochemicals and industrial products such as paraffin waxes, lube base oils, aromatics and asphalts.

## Selected financial data

Key data	Revenues	EBIT	Employees
2015	COP 52,347bn	COP 2,131bn	10,765
2014	COP 65,972bn	COP 14,449bn	11,076
2013	COP 70,429bn	COP 21,835bn	10,686
2012	COP 68,852bn	COP 23,342bn	9,701
2011	COP 65,968bn	COP 25,044bn	8,770

Main shareholders	2016
Colombian Ministry of Finance	88.5%

Geographical Breakdown	Turnover 2015	Employees
Colombia	49.8%	N/A
United States of America	22.8%	N/A
Asia and Europe	19.3%	N/A
Central America and Caribbean	6.4%	N/A
South America and others	1.7%	N/A

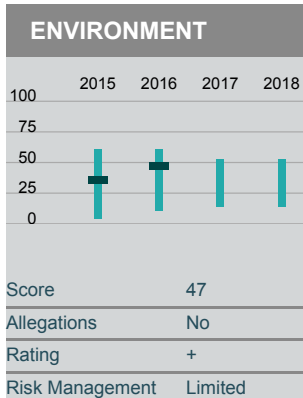
Main economic segment	Turnover 2015
Exploration and production	49%
Refining and petrochemicals	43%
Transportation and logistics	8%

## Selected ESG Indicators

	2015	2014
Non-executive Board member(s) responsible for CSR issues	Yes	Yes
Executive remuneration linked to CSR performance	Yes	Yes
3-year energy consumption trend in main business segment (normalized to production)	N/A	N/A
Percentage of independent Board members	75	67
Percentage of women on Board	0	0
Percentage of women in Executive team	22	20
Percentage of women in workforce	23.4	24
Percentage of employees covered by collective agreements on working conditions	N/A	N/A
3 year trend for safety at work	↘	↗
Involvement in armament	No	No
Transparency on payment of tax	Insufficient	N/A

## CSR performance per domain

■ Sector performance  
■ Company performance  
Rating : min- / max ++

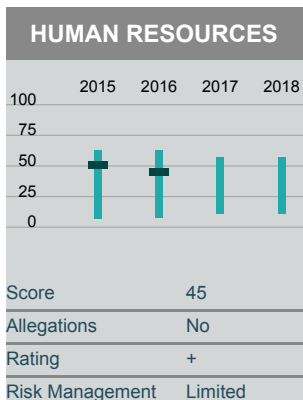


### Key issues

Most companies have increased their involvement in risky business activities including producing oil & gas in weak governance zones, deep waters or from unconventional sources. This context increases the exposure to operational safety failures, such as major accidental pollution events including pipeline ruptures, fires at refineries, oil spills and chemical soil contamination. Accidents leading to massive quantities of petroleum spills represent major risks for land and marine ecosystem. Despite the uncertainty on future climate regulations and energy prices, mitigating greenhouse gases emissions and energy consumption is necessary given the heavy impact of energy companies on climate change.

### Company performance

- The Company's performance in the Environment domain is limited in absolute terms.
- The domain's performance has improved compared to the previous review.
- The improvement is due notably to disclosure of means dedicated to pollution prevention such as pollution control audits and risk assessment.
- The company also improved its disclosure on means implemented in reducing energy consumption and greenhouse emissions. Also compared to previous review, there is a positive trend of key indicators on energy consumption, GHG emissions, and flaring & venting in its upstream operations.
- Managerial tools such as environmental impact assessments, monitoring and relevant management guidelines are still in place to address biodiversity. Preservation of habitats and protection of endangered species are implemented to reduce impact of the company's operation. However, quantitative biodiversity indicators were not disclosed.

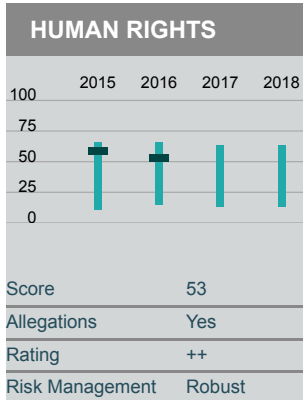


### Key issues

Reducing the recurrence of fatalities among employees and contractors through establishing a strong culture of health and safety risk management is a matter of prime importance for companies. In a context of intense competition for talents, oil and gas companies are also exposed to human capital deficit. Attracting new qualified workers and anticipating the turnover related to an ageing workforce through the development of career management and promotion of employability represents a major sector challenge.

### Company performance

- The Company's performance in the Human Resources domain is limited in absolute terms.
- The domain's performance has deteriorated compared to the previous review.
- The deterioration is due to a decline in the coverage of means dedicated to addressing mental health.
- Ecopetrol disclosed measures dedicated to improving health and safety conditions for its employees such as training programmes, OHSAS 18001 certification, and internal audits. Disclosed safety KPIs show an improving trend.
- Although, Ecopetrol has disclosed dedicated means to career management and wide coverage, the number of training hours per employee showed a negative trend.
- The Company does not appear to have taken a formal commitment to responsible reorganisations or to have implemented outplacement services. Meanwhile, the number of employees has decreased over three years and the company reported to have undergone organisational changes recently.

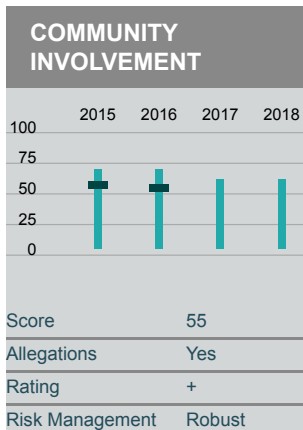


**Key issues**

Ensuring the respect of fundamental rights is crucial for the oil and gas industry as it is regularly criticised for its security arrangements, indigenous relationship management and indirect support to repressive regimes, notably in such countries as Burma, Kazakhstan, Azerbaijan or the UAE. In order to ensure respect for fundamental labour rights, it is also important, especially for international companies operating in various legislative environments, to have policies and management systems in place, to guarantee freedom of association and the right to collective bargaining.

**Company performance**

- The Company's performance in the Human Rights domain is robust in absolute terms, which is consistent with the previous review.
- The deterioration is mostly due to the allegation faced by the company on anti-trade union practices which the Company is not transparent on.
- Despite that, the Company made references to freedom of association and right to collective bargaining in its public reporting. Ecopetrol also implemented permanent measures with third-party involvement to monitor the respect of freedom of association.
- The Company has exhaustively reported on significant measures to ensure respect of human rights such as training, internal audits and consultation with local stakeholders.
- Ecopetrol's formalised commitment on non-discrimination is supervised by the Human Rights Committee. A confidential reporting system has been set up to prevent discrimination. Lastly, the number of women in management positions have increased over the last three years.



**Key issues**

Oil & gas companies are often associated with disruptive social and environmental impact on local communities and notably health issues or restricted access to subsistence means arising from heavy pollution accidents. Companies are therefore expected to engage with communities on mitigating these negative impacts, for the durability of their own projects as for the well-being of local populations. In addition, philanthropy can be a powerful tool for enhancing a company's reputation. This is especially important in developing countries, where a business may face outside expectations. Various forms of philanthropy can include financial support, in-kind giving and volunteering.

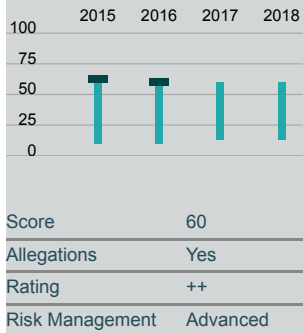
**Company performance**

- The Company's performance in the Community Involvement domain remains robust in absolute terms.
- Ecopetrol has made reference to promote local social and economic development in its integrated sustainable management report. Also dedicated means such as financial resources and local employment programmes have been implemented. Furthermore, Ecopetrol disclosed its direct social investment which exhibited a positive trend.
- Regarding tax transparency, the company reports only on gross taxes paid, with no breakdown per country or regions. Besides, it does not justify its presence in offshore financial centres such as in Bermuda and in Panama.
- The Company commits to general interest causes and has allocated means such as employee volunteering programmes, donations and a dedicated foundation to general causes. The number of hours employees utilised in volunteering programme has increased over the past two years.
- Stakeholders' feedback revealed that the Company faced an allegation on promotion of the social and economic development on which it was not transparent.

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**BUSINESS BEHAVIOUR (C&S)**



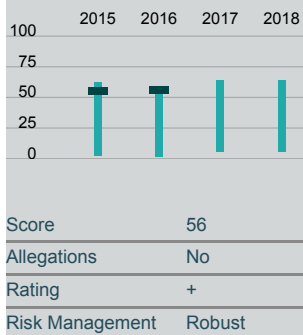
**Key issues**

The prevention of corruption and of conflicts of interest is the main sector challenge for various reasons: bribes paid for the award of contracts are frequent, public authorities are involved in the selection process and operations often take place in weak governance zones. It is unlawful for oil and gas companies to avoid competing with one another when not selling crude oil, natural gas and refined products, but also when leasing mineral rights.

**Company performance**

- The Company's performance in the Business Behaviour domain remains advanced in absolute terms.
- Ecopetrol has a visible policy on prevention of corruption and exhaustively reports on dedicated means audits, risk assessment and confidential reporting systems set up on this issue. Furthermore, key indicators were disclosed.
- The Company's reported exhaustively on means dedicated to integration of social standards in the supply chain namely; supplier development programme, supplier questionnaires, social audits, and training of employees in charge of purchasing. Ecopetrol reports transparently on the number of improvement plans implemented following suppliers audits.
- Stakeholders' feedback revealed the occurrence of one allegation on corruption in Colombia which the company does not transparently report.

**CORPORATE GOVERNANCE**



**Key issues**

Sound corporate governance is required to oversee a company's strategic direction, including the CSR strategy. Vigeo's framework has been adapted to capture the level of integration of CSR topics at Board-level, supplementing traditional signals on efficient governance practices. Directors are notably evaluated on their level of diversity and experience with operational, financial, and CSR topics. The audit and internal controls system is examined regarding the efficiency and reach of its risk management. Shareholders are expected to have fair voting rights and access to all relevant information on emerging ESG risks. Executive remuneration is assessed for transparency and alignment with balanced stakeholder interests.




**Company performance**

- The Company's performance in the Corporate Governance domain remains robust in absolute terms.
- The majority of the members of the board are considered independent while the roles of the chairman and CEO are separated. Also, a sustainability committee is part of the board.
- Ecopetrol has an independent Audit Committee with a comprehensive role. Internal controls systems cover CSR risks and dedicated processes to manage these risks are in place.
- Ecopetrol respects the "one share - one vote" principle and does not seem to put any restrictions on voting rights. Yet, not all major items are put to shareholders' vote.
- Executive remuneration appears to be linked to CSR performance objectives though quantified targets are not disclosed.
- A review of stakeholder sources did not reveal any allegations against Ecopetrol during the period under review.

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## CSR performance per criterion

### Detailed Analysis

<b>Environment</b>		<b>12</b>
ENV1.1	Environmental strategy	12
ENV1.2	Pollution prevention and control (soil, accident)	14
ENV1.3	Development of alternative fuels and renewable energy sources	16
ENV1.4	Protection of biodiversity	17
ENV2.1	Protection of water resources	19
ENV2.2	Management of energy consumption and greenhouse gas emissions	20
ENV2.4	Management of non greenhouse gas emissions	22
ENV2.5	Waste management	23
<b>Human resources</b>		<b>24</b>
HRS1.1	Promotion of labour relations	24
HRS2.3	Responsible management of reorganisations	25
HRS2.4	Career management and promotion of employability	26
HRS3.2	Improvement of health and safety conditions	28
<b>Human rights</b>		<b>30</b>
HRT1.1	Respect for human rights standards and prevention of violations	30
 HRT2.1	Respect for freedom of association and the right to collective bargaining	32
HRT2.4	Non-discrimination	34
<b>Community involvement</b>		<b>36</b>
 CIN1.1	Promotion of the social and economic development	36
CIN2.2	Contribution to general interest causes	38
<b>Business behaviour (C&amp;S)</b>		<b>39</b>
C&S1.1	Product safety	39
C&S2.3	Integration of environmental factors in the supply chain	40
C&S2.4	Integration of social factors in the supply chain	41
 C&S3.1	Prevention of corruption	43
C&S3.2	Prevention of anti-competitive practices	45

## Corporate governance

		46
CGV1.1	Board of Directors	46
CGV2.1	Audit & Internal Controls	48
CGV3.1	Shareholders	50
CGV4.1	Executive Remuneration	51

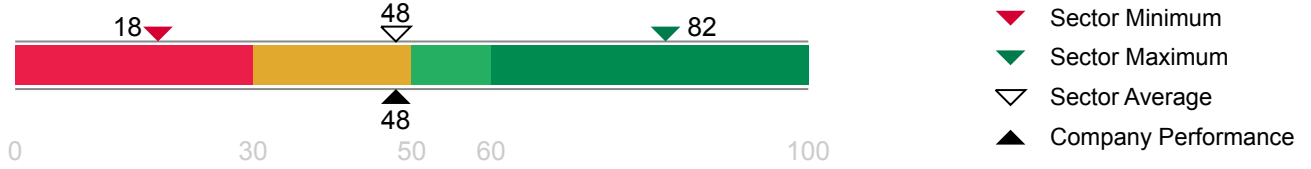
 Involvement in allegations
  Involvement in allegations with evidence of corrective measures

Environment

Score: 47

ENV1.1 Environmental strategy

(score: 48, weight: 3)



Visibility of commitment to environmental issues

The company has made references to environmental protection in its 2015 Integrated Sustainable Management Report, and sets specific targets regarding:

- Pollution prevention and control
- Greenhouse gas emissions

In addition, the company is a signatory of the Global Compact and communicates on this principle.

Relevance of environmental strategy

The company commits to most of its responsibilities in terms of environmental protection:

- Protection of biodiversity
- Pollution prevention and control (soil, accident)

Relevance of climate change strategy

The company commits to the majority of its responsibilities in terms of climate change:

- Management of energy consumption and related greenhouse gas emissions

Ownership of commitment

The commitment applies throughout the company, supported by senior management.

Means allocated to environmental management

The company has allocated significant resources to environmental management:

- Environmental manual specifying procedures and responsibilities: Ecopetrol has an internal guide that includes information for decision-making related to environmental issues in the company's process.
- Environmental performance measured against targets: Ecopetrol has set targets regarding environmental incidents, barrels of oil spilled, and greenhouse gases and the company measured its environmental performance against these targets.
- External Verification of reporting on environmental performance: The data reported by the company on its environmental performance is verified by an independent external party.

Coverage of certified environmental management systems

Ecopetrol is ISO 14001 certified in the following production facilities:

- Regional Management Middle Magdalena
- South Regional Management
- Central Regional Management
- Catatumbo Orinoquia Regional Management

However, the percentage of sites covered by the certification is not disclosed.

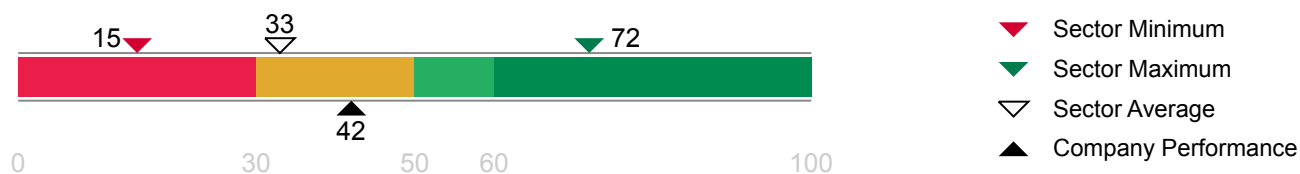
Integration of climate change costs into operational decisions

The company reports it does not value the externality of GHG emissions as a variable internal cost.

Leadership	76	Implementation	20
Visibility	100	Means & resources	39
Relevance	82	Coverage	0
Ownership	30		

**ENV1.2 Pollution prevention and control (soil, accident)**

(score: 42, weight: 3)



**Relevance of commitments on pollution prevention and control**

The company commits to some of its responsibilities in terms of the prevention and control of industrial accidents and pollution:  
- pipeline integrity (spills)

**Means allocated to pollution prevention and control (onshore & offshore)**

Basic resources are allocated to pollution prevention and control:  
- Pollution Control Audits: The Company has implemented audits on its operational procedures to check the likelihood of environmental incidents.  
- risk assessment/identification studies: Ecopetrol reported that it has implemented identification processes to identify critical equipment especially pipelines that pose high or very high risk to pollution and accidents.

**Coverage of the means**

There is no evidence that these means were allocated in majority of the company's sites.

**Share of double-hulled tankers (managed and time-chartered) and average age of tankers that transports the company's oil products**

The company does not disclose the percentage of double-hulled tankers (managed and time-chartered) used to transport its oil products.

**Decommissioning and rehabilitation of polluted soil**

Ecopetrol spent EUR 29m for soil recovery and protection programmes which is 12% less than the amount spent in 2014. In addition, the company was involved in 98 environmental restoration operations linked to decommissioning of wells in 2015.

**Stakeholders' feedback on industrial accidents**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral

**Spill volumes (normalised to production)**

Spill volumes normalised to upstream production have decreased but not continuously over the past five years by 92% to stand at 0.2721 barrels per kBOED in 2015.

**Results on minor environmental incidents**

Minor environmental incidents normalised to production have decreased by 74% but not continuously over the past five years to stand at 0.0144 incidents per kBOED in 2015.

<b>Leadership</b>	<b>30</b>	<b>Implementation</b>	<b>31</b>	<b>Results</b>	<b>65</b>
Relevance	30	Means & resources	31	Performance	65
		Coverage	30	Trends	65

---

**ENV1.3      Development of alternative fuels and renewable energy sources**  
(deactivated)

---

This Sustainability Driver is only analysed for large companies in the Energy Emerging Market sector. It is therefore not analysed for this company.



ENV1.4 Protection of biodiversity

(score: 57, weight: 3)



Relevance of the commitment

The company's commitment towards biodiversity protection covers the main impacts of its activities:

- Loss or degradation and fragmentation of ecosystems and habitats during exploration & production
- Effects on sensitive species
- Soil erosion

Managerial tools allocated to biodiversity protection

The company has implemented relevant measures to identify the impacts of its operations on biodiversity, including:

- Environmental impact assessments: The Company has developed a project with the Alexander Von Humboldt Institute to identify priority areas for biodiversity conservation (preservation, restoration, sustainable use and generation of knowledge), by means of a bio-geographic, ecological and sector strategic planning approach.
- Monitoring of biodiversity indicators: The company monitors the lands and species impacted by its activities as well as by its biodiversity projects. It also keeps a list of vulnerable species included in its study area.
- Relevant biodiversity management guidelines: The company has internal documents like the Environmental Information Model for Ecopetrol provides information on the environmental nature and suitable mechanisms on operation in environmentally protected areas. There is also a methodological guide that provides information on the environmental structure and bases for analysing risk, relevance and priority of environmental investments.

Local measures taken to protect biodiversity on operation sites

The Company has implemented some measures to limit the impacts of its operations on biodiversity such as:

- Preservation of habitats, buffer areas for relocation of disturbed species before and during extractions operations: In line with Ecopetrol's Environment management strategy, there has been design and implementation of action plans to restore ecosystems such as morichales, swamps and rain forest. These action plans include forest improvement, silvopastoral development, conservation agreements for connectivity and monitoring of these restoration.
- Protection strategies for endangered species: The Company in collaboration with the Wildlife Conservation Society work in the conservation of 10 species in the regions of Magdalena Medio and Llanos Orientales.

Coverage of means allocated to biodiversity protection

Ecopetrol reported that the measures covers Andean region, the Llanos Orientales, the Chocó biogeographic region, the Amazon Foothills and the Caribbean region. These represent the majority of sites.

Results with regard to biodiversity protection

The company does not disclose indicators on its impact on biodiversity.

Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the

company during the period under review: stakeholders' feedback is neutral.

<b>Leadership</b>	<b>65</b>
Relevance	65

<b>Implementation</b>	<b>53</b>
Means & resources	48
Coverage	65

<b>Results</b>	<b>54</b>
Performance	65
Trends	0

## ENV2.1 Protection of water resources

(deactivated)

This Sustainability Driver is only analysed for large companies in the Energy Emerging Market sector. It is therefore not analysed for this company.

**ENV2.2 Management of energy consumption and greenhouse gas emissions**

(score: 40, weight: 3)



**Relevance of the company's commitment in terms of reducing its energy consumption.**

The company's commitment to reduce its energy consumption is general.

**Relevance of the company's commitment in terms of reducing its greenhouse gases related to energy consumption.**

*The company has set quantified targets with regard to its greenhouse gas emissions, and these cover one or more business segments. Ecopetrol has a target to reduce GHG emissions associated with its operations by 143,131 tons in 2016.*

**Relevance of the company's commitment in terms of reducing flaring and venting.**

The company does not disclose any commitment to reduce flaring and venting.

**Means allocated to reduce energy consumption and related GHG emissions**

*The company uses innovative measures compared to its peers in order to reduce its energy consumption and its related emissions:*

- *Monitorig: Ecopetrol monitored its energy consumption and published it in its Sustainability reports.*
- *Carbon footprint assessment: The company has put in place computational tools to analyse, identify and quantify GHG emissions and possible mitigation potential in the company's operations.*
- *Use of state of the art technologies to improve energy efficiency: Ecopetrol has embarked on a project which focused on use of gas for power cogeneration to reduce GHG emissions.*
- *Use of more energy efficient processes: In 2015, Ecopetrol reported to have implemented programs in energy efficiency such as installation of vapour recovery units in tank systems.*

**Coverage**

*There is no evidence that such measures cover a majority of the company's sites.*

**Means allocated to flaring & venting and carbon capture & storage**

*In 2015, Ecopetrol installed annular gas networks connecting 135 wells to reduce gas venting. In addition, there is a pilot and research project that aims to capture CO2 in Ecopetrol's relevant stationary sources, the project is designed to be utilised in enhanced oil recovery projects.*

**Energy consumption in upstream operations (E&P)**

*The company's energy consumption in its upstream operations, normalised to upstream production stood at 2.71 GWh per kBOED in 2015 an increase from 2.50 GWh per kBOED in 2014.*

**Energy consumption in downstream operations (R&M)** The company does not disclose quantitative data on energy consumption.

**Energy-related GHG emissions in upstream operations (E&P) (direct and indirect)**

*The company's GHG emissions linked to its upstream operations (direct and indirect), normalised to upstream production, have decreased by 9% but not continuously over the past five years to stand at 4.74 kt per kBOED in 2015.*

**GHG emissions in downstream operations (R&M) (direct and indirect)**

*The company's GHG emissions linked to its downstream operations (direct and indirect), normalised to downstream production, have increased by 41% over the past three years. It stood at 15.35 Kt per kBOD in 2015.*

**Flaring and venting in upstream operations**

*The company's emissions from flaring and venting in upstream operations, normalised to upstream production, have decreased by 11% but not continuously over the past three years. It stood at 3.15 kt per kBOED in 2015.*

<b>Leadership</b>	<b>32</b>
Relevance	32

<b>Implementation</b>	<b>69</b>
Means & resources	85
Coverage	30

<b>Results</b>	<b>19</b>
Performance	19

## ENV2.4 **Management of non greenhouse gas emissions** (deactivated)

This Sustainability Driver is only analysed for large companies in the Energy Emerging Market sector. It is therefore not analysed for Ecopetrol S.A.

## ENV2.5 Waste management (deactivated)

This Sustainability Driver is only analysed for large companies in the Energy Emerging Market sector. It is therefore not analysed for Ecopetrol S.A.

**Human resources**

**Score: 45**

**HRS1.1 Promotion of labour relations**

(deactivated)

This Sustainability Driver is only analysed for large companies in the Energy Emerging Market sector. It is therefore not analysed for this company.



**HRS2.3 Responsible management of reorganisations**

(score: 12, weight: 2)



**Relevance of commitment to manage reorganisations responsibly** The company does not disclose any commitment to manage reorganisations responsibly.

**Involvement with employee representatives** The company does not disclose any commitment to inform and consult employee representatives on reorganisations.

**Means allocated to prevent and manage reorganisations** *Information obtained from the company and public sources regarding measures allocated to prevent and manage reorganisations is insufficient.*

**Coverage**

**Stakeholders' feedback** A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

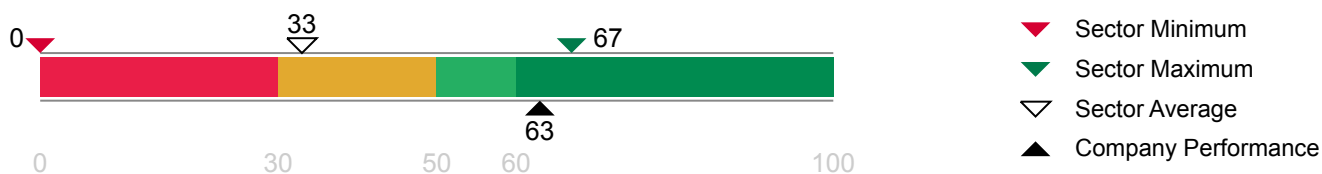
**Result of the company's commitment to manage reorganisations responsibly** *The information on measures implemented to limit impacts of reorganisations recently conducted by the company is insufficient, moreover its workforce has decreased since 2013.*

<b>Leadership</b>	0	<b>Implementation</b>	0	<b>Results</b>	35
Relevance	0	Means & resources	0	Performance	35
Ownership	0	Coverage	0		

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**HRS2.4 Career management and promotion of employability**

(score: 63, weight: 2)



**Visibility of commitment**

The company has issued a largely publicised, formal commitment to promote career management and training which is publicly available in its Integrated Policy.

**Relevance of commitment**

The company's commitment to promoting career management and training addresses its main responsibilities:

- Ensure training
- Promote career development
- Put in place a concerted career management framework, which is transparent and individualized

**Ownership of commitment**

The Head of HR is part of the company's Board or Executive Committee. However it is not clear if line managers are evaluated on their performance in terms of HR management.

**Career management systems**

The Company has formalised the skill requirements for the various job positions and has set up an internal job opportunity marketplace. Moreover, employees have annual performance assessment interviews.

**Coverage of career management systems**

100% of the employees were covered by the performance evaluations in 2015.

**Types of training provided to non-managers**

The training programmes are aimed at adapting employees' skills to the requirements of their current position and also enable them to develop additional skills. These include programmes such as:

- Diplomas in gas and gas condensate
- Masters in Chemical Engineering program
- International Local Operation Certification by the National Center for Construction, Education and Research.

**Means allocated to training for all employees**

The number of training hours per employee has decreased over the past three years by 31% to stand at 52.90 hours per employee in 2015.

**Mobility / turnover**

The company does not disclose quantitative data on performance indicators such as employee turnover or mobility rates.

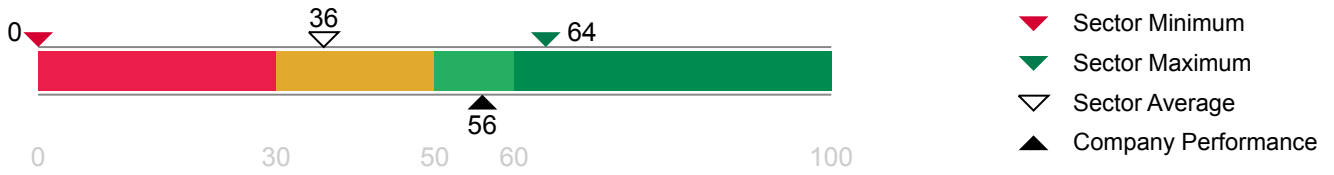
**Training delivered during the year under review**

92% of the employees received training during the year under review.

Leadership	62	Implementation	66	Results	60
Visibility	100	Means & resources	32	Performance	60
Relevance	65	Scope	100		
Ownership	30	Coverage	100		

**HRS3.2 Improvement of health and safety conditions**

(score: 56, weight: 3)



**Visibility of health & safety commitments**

The company has made a formalised commitment to health and safety issues, which covers both its own employees and sub-contracted workforce, in its Code of Ethics.

**Relevance of commitment**

The company's commitment addresses all of its responsibilities:

- Ensure awareness about health and safety issues
- Reduce the number of work accidents and their severity
- Prevent occupational disease
- Promote well-being
- road safety
- public health

**Ownership of commitment**

The company has Joint Committees on Occupational Health which are bodies comprised of employee and company representatives, which aim to promote and monitor compliance with the occupational health programs in Ecopetrol. The company has a National Joint Committee, 12 Regional Joint Committees and 34 Local Committees, in which 268 people participated in 2015.

**Means allocated to health and safety**

The Company has allocated means to address these issues, including a certified health and safety system:

- training and awareness raising programs: Ecopetrol organises an annual occupational health week to raise awareness on occupational safety, emergencies and self-care. The company has also training programs for people on electrical safety with aim to reach a target of zero accidents, hazards and diseases resulting from electrical system activities.
- internal monitoring: Ecopetrol monitors key health and safety indicators such as accident frequency rates, accident severity rates for both employees and contractors.
- risk assessments: Ecopetrol stated as part of its prevention of risks associated to occupational accidents and diseases there is an identification process of conditions that affect health and safety.
- internal H&S audits: There are overall health assessments performed annually carried out in order to better understand the employees' health status and determine preventive actions. There are also industrial hygiene action plans that include identification and evaluation of physical and chemical hazards which may cause occupational diseases.
- OHSAS 18001 certifications: Ecopetrol has the OHSAS 18001 certification for its production and transportation activities.

**Coverage of health and safety system**

In 2015, 99% of employees were covered by the annual overall health assessment. Although the coverage of the other measures remain globally unclear.

**Means allocated to reduce stress at work**

The company has allocated significant means to address stress at work, including:

- *Monitoring of absenteeism: The company stated that it monitors data relating to absenteeism due to occupational diseases. Though the company has not publicly published its absenteeism data for 2015.*
- *Assessment of stress through analysis of internal H&S data: Ecopetrol carried out psycho-social risk assessment in 2015. The assessment covered 120 business areas which is equivalent to 4,500 assessments.*
- *Monitoring of stress through opinion surveys: the company conducts surveys at corporate level to assess satisfaction of employees with the working environment.*
- *Stress support instruments (hotline, counselling service, employee assistance programme): The company has a 24-hour hotline service that offers assistance to employees and provides assistance on how to handle stress.*

**Coverage of means allocated to address mental health**

*Ecopetrol reported that the implementation of its psycho-social action programme covered 2,565 employees which is about 29% of the workforce. Furthermore, the hotline service is reported to be provided to 120 employees.*

**Indicators for employees - Accident frequency rate**

*The total recordable incident frequency for employees have decreased by 71% but not continuously over the past five years, to stand at 0.224 per 200,000 hours worked in 2015.*

**Indicators for employees - Stress at work & Occupational diseases**

The company does not disclose quantitative data on occupational disease rates.

**Indicators for employees - Severity rate & Fatality rate**

*The company's severity rate for both employees and contractors has decreased continuously by 94% over the past three years to stand at 1.60 days per 200,000 hours worked in 2015.*

**Indicators for contractors - Accident frequency rate**

*The accident frequency rate for contractors decreased by 59% but not continuously over the past three years, to stand at 0.168 per 200,000 working hours in 2015.*

**Indicators for contractors - Stress at work & Occupational diseases**

*The company does not disclose quantitative data on contractors' absenteeism and rate of occupational disease.*

**Indicators for contractors - Severity rate & Fatality rate**

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

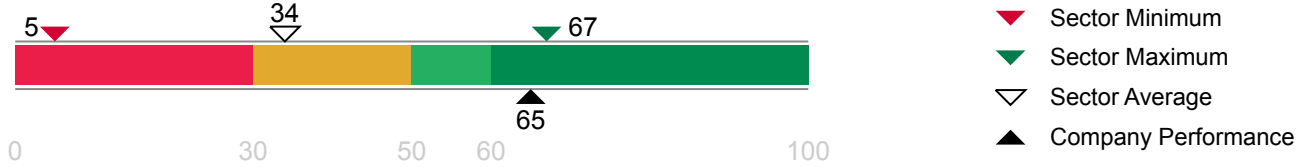
<b>Leadership</b>	<b>88</b>	<b>Implementation</b>	<b>48</b>	<b>Results</b>	<b>32</b>
Visibility	65	Means & resources	65	Performance	32
Relevance	100	Coverage	30		
Ownership	100				

Human rights

Score: 53

HRT1.1 Respect for human rights standards and prevention of violations

(score: 65, weight: 3)



Visibility of commitment

The company has issued a formalised commitment to respect and promote human rights in society in its Integrated Policy. In addition, the company is a signatory of the Global Compact and communicates on this principle.

Relevance of commitment

The Company's commitment to respect and promote human rights in society addresses its most of its responsibilities:

- respect property rights
- prevent cruel, inhuman, or degrading treatment
- prevent complicity in human rights violations
- respect the right to security of the person
- prevent human rights violations related to the use of security forces
- respect of indigenous rights

Ownership of commitment

The commitment applies throughout the company, supported by senior management. In addition, the Human Rights Committee is responsible for defining actions to be taken to prevent or mitigate a risk or impact related to human rights.

Means allocated

- The company has allocated significant measures to ensure the respect and promotion of human rights in society that include:
- awareness-raising programmes for employees: Ecopetrol implemented a communication plan in 2015 to raise awareness on human rights issues within the company.
  - training programmes for employees: Ecopetrol reported that Employees were trained on issues of human rights and business via virtual modules in 2015. Some Employees have also undergone face-to-face trainings in 2015.
  - grievance mechanisms (Reporting mechanisms of alleged violations by security providers): There is a reporting system where complaints on human rights involving employees and contractors are addressed.
  - Internal human rights audits: the company conducts field visits with regard to situations related to the human rights of Ecopetrol's stakeholders.
  - consult local independent and representative stakeholders: Ecopetrol reports that there are consultations with local communities on exploration and production projects. The company provides intercultural dialogues to foster mutual understanding to prevent ethnic conflicts that could arise from its operations. Lastly, Ecopetrol partakes in voluntary initiatives that exchange knowledge and identify best practices regarding human rights.
  - training and awareness-raising programmes for security forces: Ecopetrol has training programmes for members of the armed forces that provide security for its infrastructure.

Coverage

There is no evidence that such systems cover all of the company's operations.

## Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

<b>Leadership</b>	<b>79</b>
Visibility	65
Relevance	100
Ownership	65

<b>Implementation</b>	<b>51</b>
Means & resources	65
Coverage	30

<b>Results</b>	<b>65</b>
Performance	65

**HRT2.1 Respect for freedom of association and the right to collective bargaining**

(score: 34, weight: 2)



**Visibility of commitment**

The company has made references to freedom of association and the right to collective bargaining in its 2015 Integrated Sustainable Management Report. In addition, the company is a signatory of the Global Compact and communicates on this principle.

**Relevance of commitment**

- The company's commitment addresses its main responsibilities:
- Protection of freedom of association and the right to organise
  - Respect of the right to collective bargaining
  - Respect and protection of workers' representatives
  - Prevent employee representative discrimination
  - Guarantee the effective exercise of the trade unions rights in the workplace
  - Prevent violations of the freedom of association and the right to organise.

**Ownership of commitment**

The commitment applies throughout the company, supported by senior management. In addition, there is an Ecopetrol-Petroleum Industry Workers' Trade Union National Committee as well other regional subcommittees involved.

**Monitoring**

- The company has implemented permanent measures, with third-party involvement, to monitor the respect of freedom of association within its operations:
- On-going monitoring of labour rights risks: The committees and subcommittees continually monitor the trade union leaders and workers that could be at risk of human right violation.
  - Cooperation with unions (joint grievance procedure): The Company and the Petroleum Industry Workers' Trade Union have formed collective committees and subcommittees that include response programs for cases involving violation of rights to freedom of association and collective bargaining.

**Promotion of collective bargaining**

The company has provided employees with some information on their trade union rights through introductory training, contracts, as part of human rights training, etc.

**Coverage**

There is no evidence that the company has set up such programmes throughout the company.

A review of stakeholders' sources revealed that the Company is involved in isolated or occasional controversies of minor or significant severity

**Stakeholders' feedback**

As of 11/2016, Ecopetrol S.A. was involved in 1 controversy

- Case 1 (15/05/2016): Ecopetrol to be investigated for anti-trade union practices in Colombia.



A complete analysis of the severity of each case mentioned is available in Vigeo Controversy Product.

## Company's responsiveness

Overall, the company is non-communicative

For each of the above mentioned cases, Ecopetrol S.A.'s response is considered:  
- case 1: The company is non communicative: the company denies the facts without further explanations OR only provides vague and general statements on the case

The analysis of Ecopetrol S.A. management of each case is available in Vigeo's controversy profile.

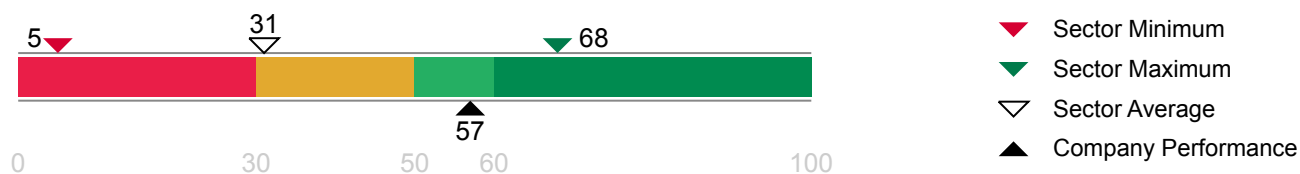
Leadership	58
Visibility	30
Relevance	65
Ownership	65

Implementation	30
Means & resources	30
Coverage	30

Results	15
Performance	15

**HRT2.4 Non-discrimination**

(score: 57, weight: 1)



**Visibility of commitment**

The company has issued a formalised commitment to non-discrimination in its 2015 Integrated Sustainable Management Report and Company Website. In addition, the company is a signatory of the Global Compact and communicates on this principle.

**Relevance of commitment**

The company's commitment to non-discrimination explicitly defines most of the categories and the management processes to which these apply:

- Social background
- Religion
- Political opinion
- Gender
- Race / ethnicity / nationality
- Disabilities
- Discrimination in employment decisions (hiring and promoting)
- Discrimination in working conditions (remuneration)

**Ownership of commitment**

The Human Rights Committee, which is the highest body in the organisation for these matters and is responsible for defining actions to be taken to prevent or mitigate a risk or impact related to human rights including non-discrimination. The Ethics and Compliance Office and Disciplinary Control Office are in charge of handling discrimination complaints.

**Means allocated**

The company has set up basic measures to prevent discrimination and promote diversity:

- awareness raising: The Company conducts awareness activities in human rights and values such as non-discrimination and diversity, to the benefit of its employees, contractors and other relevant stakeholders.
- training: The Company conducts trainings on non discrimination and diversity aimed at its employees, contractors, and other relevant stakeholders.
- monitoring: The Company keeps track of discrimination complaints in the workplace as well as KPIs related to employees and new hires by gender.
- disciplinary procedures: The Company take measures against employees violating anti-discrimination standards at the work place through. Such measures are: prohibitions, and going through a disciplinary board.
- confidential reporting system: The company has a hotline service through which cases of discrimination can be reported.

**Coverage**

The company has set up programmes to promote diversity (eg: training, awareness-raising, etc.) throughout the company.

**Results in terms of gender distribution**

The share of women in management positions has increased by 4.06 percentage points but not continuously over the last three years, to stand at 21.7% in 2015.

## Results in terms of employment of disabled persons

The company does not disclose quantitative data on performance indicators such as the share of disabled persons in the total workforce.

## Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral.

<b>Leadership</b>	<b>79</b>	<b>Implementation</b>	<b>65</b>	<b>Results</b>	<b>28</b>
Visibility	65	Means & resources	30	Performance	65
Relevance	100	Coverage	100	Trends	15
Ownership	65				

Community involvement

Score: 55

CIN1.1 Promotion of the social and economic development

(score: 52, weight: 3)



Visibility of the policy

The company has issued a formalised and accessible commitment to promote local social and economic development in its Integrated Policy.

Relevance of commitment

The company's commitment to promote local social and economic development addresses its main responsibilities:

- Support local employment
- Promote social development of local population
- Implement a responsible tax strategy
- Reduce negative social impacts of operations

Ownership of commitment

The commitment applies throughout the company, supported by senior management.

Means allocated

The company has allocated extensive means or innovative measures to manage the impacts of operations on local social and economic development including:

- Financial resources: The company has set up a programme called Ecopetrol High School Graduates, in which scholarships are awarded to high school graduate to pursue their undergraduate studies. Both the academic achievement and socioeconomic status of the students are considered for these scholarships.
- Programmes to develop local employment: There is a Training for the Future programmes that is aimed at developing local human resources for the activities in the territory. Human resources for the production sector is targeted. In an alliance with other NGOs, Ecopetrol provided Colombia with a drilling school to offer free public training on issues of drilling.
- Direct operational involvement in social development programmes: the Company has invested in the local supplier development programme in its areas of operation.
- Social impact assessments: the company brings together communities and authorities to participate in workshops to identify impacts and measures for the management of biotic, abiotic and socioeconomic environments associated with the territory, where the company will implement its activities.
- Community engagement tools: The Company conducts consultation meetings with the community and local authorities, under the framework of relocation processes to ensure that people get a better housing than the original one.

Geographical coverage

In 2015, Ecopetrol reported that its social investment programs had a coverage of a national level and impacted more than one region.

Performance trend

The company's direct social investment normalised to EBIT has increased by 0.2 percentage points but not continuously over the past three years, to stand at 0.41% in 2015.

**Transparency of tax reporting**

*The company reports only on gross taxes paid. There is no breakdown on a regional or country basis.*

**Presence in IMF 'offshore financial centers' and/ or in jurisdictions considered by the OECD as not compliant enough with tax transparency rules**

*Although Ecopetrol operates in Bermuda, Panama and the Cayman Islands, considered as IMF offshore financial centres, it has justified its presence in most of these countries except in Bermuda and two subsidiaries in Panama. Ecopetrol is involved in Hydrocarbon exploration, exploitation and production in the Cayman Islands and pipeline transportation of crude oil in Panama.*

 **Stakeholders' feedback**

A review of stakeholders' sources revealed that the Company is involved in isolated or occasional controversies of minor or significant severity

*As of 11/2016, Ecopetrol S.A. was involved in 1 controversy*

*- Case 1 (31/05/2016): Indigenous people occupy Ecopetrol's Gibraltar gas plant in Colombia*

*A complete analysis of the severity of each case mentioned is available in Vigeo Controversy Product.*

**Company's responsiveness**

Overall, the company is non-communicative

*For each of the above mentioned cases, Ecopetrol S.A.'s response is considered: - case 1: The company is non communicative: the company denies the facts without further explanations OR only provides vague and general statements on the case*

*The analysis of Ecopetrol S.A. management of each case is available in Vigeo's controversy profile.*

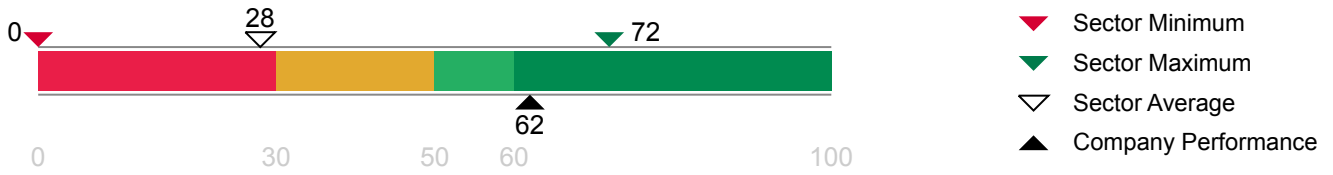
Leadership	55
Visibility	65
Relevance	65
Ownership	30

Implementation	83
Means & resources	100
Coverage	65

Results	18
Performance	15
Trends	30

**CIN2.2 Contribution to general interest causes**

(score: 62, weight: 1)



**Relevance of commitment**

The company's commitment to supporting general interest causes is general.

**Ownership of commitment**

The commitment applies throughout the company, supported by senior management. In addition, other employees are directly involved.

*The company has the Ecopetrol People Foundation.*

**Means allocated**

*The company has allocated significant means to general interest causes, including:*

- *Financial support: The Company allocated special investments, with the collaboration of the Ministry of Education and the Organisation of Iberoamerican States, to eradicate illiteracy.*
- *In-kind donations: The Company donated computers with satellite connectivity and solar energy to education institutions.*
- *Sponsoring employee volunteering: The company has set up a corporate volunteering programme through which employees can invest up to 16 working hours per year in social activities organised by the Ecopetrol People Foundation.*
- *Dedicated foundation: The company has the Ecopetrol People Foundation to implement its social programmes.*

**Geographical coverage**

*These means are allocated in all the regions in Colombia where the company operates.*

**Trend in contributions to general interest causes**

*The number of hours utilised by the volunteering programme has increased from 6330 hours in 2014 to 6530 hours in 2015.*

<b>Leadership</b>	<b>41</b>	<b>Implementation</b>	<b>79</b>	<b>Results</b>	<b>65</b>
Relevance	30	Means & resources	65	Trends	65
Ownership	65	Coverage	100		

## Business behaviour (C&S)

Score: 60

### C&S1.1 Product safety

(deactivated)

This Sustainability Driver is only analysed for large companies in the Energy Emerging Market sector. It is therefore not analysed for this company.

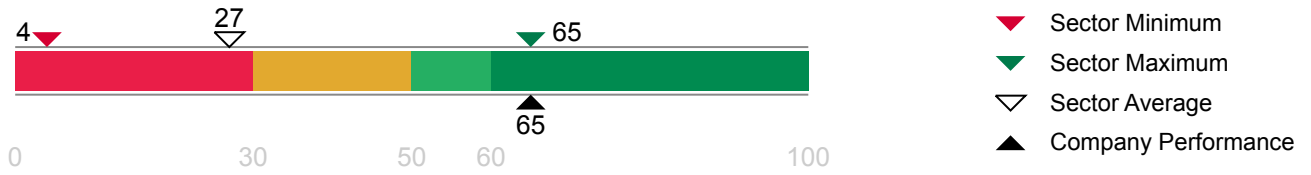
## C&S2.3 **Integration of environmental factors in the supply chain** (deactivated)

This Sustainability Driver is only analysed for large companies in the Energy Emerging Market sector. It is therefore not analysed for this company.



**C&S2.4 Integration of social factors in the supply chain**

(score: 65, weight: 2)



**Visibility of commitment**

*The company has made references to including social factors in supply chain management in its annual Integrated Sustainable Management Reports.*

**Relevance of commitment**

*The company's social requirements for suppliers address the main relevant issues in the sector:*

- Freedom of association and right to collective bargaining
- Abolition of child labour
- Abolition of forced labour
- Non-discrimination
- Health and Safety

**Ownership of commitment**

*The commitment applies throughout the company, supported by senior management.*

**Means allocated**

*The company has set up at least three measures to include social factors in supply chain management:*

- Integration of social issues into contractual clauses: Ecopetrol has labour guidelines which are contained in the guide on employment aspects and preconditions for contracted activities.
- Supplier support: Among the objectives of the the Supplier Development Programme is to make sure that the Company's contractors have a Corporate Responsibility plan that goes in alignment with Ecopetrol's guidelines.
- supplier questionnaires: the company conducted a survey to measure suppliers' perception of business ethics and transparency in collaboration with the National Consulting Centre.
- training/awareness raising of employees in charge of purchasing: In 2015, Ecopetrol carried out training on labour issues for its contract planners, contract managers, administrative contract managers, employees for the strategic supply department and labour relations area.

**Audits of suppliers/subcontractors**

*Ecopetrol reported that dedicated labour audits are carried out.*

**Coverage**

*The measures implemented cover the main suppliers.*

**Share of corrective measures / problems uncovered**

All major social problems uncovered in the supply chain were addressed by corrective measures.

*In 2015, the company evaluated 6,196 suppliers based on occupational health & safety compliance and CSR criteria. 104 of the suppliers were implementing improvement plans.*

## Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral

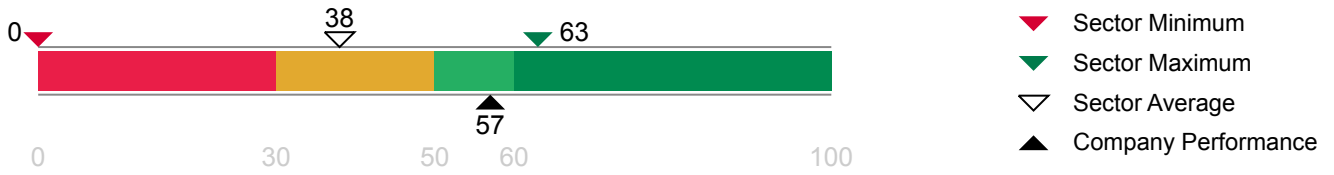
<b>Leadership</b>	<b>48</b>
Visibility	30
Relevance	65
Ownership	30

<b>Implementation</b>	<b>65</b>
Means & resources	65
Coverage	65

<b>Results</b>	<b>81</b>
Performance	81

C&S3.1 Prevention of corruption

(score: 57, weight: 3)



Visibility of commitment

The company has issued a formalised commitment to preventing corruption in its Code of Ethics. In addition, the company is a signatory of the Global Compact and communicates on this principle.

Relevance of commitment

The Company's commitment to preventing corruption addresses its main responsibilities:

- Bribery
- Gifts and invitations
- Extortion
- Fraud
- Money laundering
- Conflicts of interest
- Illegal financing of political parties
- Prohibition of facilitation payments

Ownership of commitment

The commitment applies throughout the company, supported by senior management. In addition, the company supports the EITI on an international level. The ethics and compliance unit is also directly involved.

Involvement of employees

Ecopetrol trains both direct employees and employees of contractors in order to raise awareness and create a culture of zero tolerance to corruption.

Means allocated

The Company has set up internal and external controls to prevent corruption, including a confidential reporting system, that include:

- Confidential reporting system: The Company has a dedicated confidential channel for reporting violations of corporate ethics.
- Internal audits: The Audit department performs audits to identify weakness in the system that are likely to breed corruption-related events.
- Risk assessment of company vulnerability: Ecopetrol conducts a risk assessment of its exposure to corruption according to a methodology defined by the Ethics and Compliance unit.
- external audits: Ecopetrol has developed its anti-corruption strategy that includes audits by external auditors to inspect specific issues, such as procurement processes and projects.

Coverage

The measures implemented appear to cover all significant parts of the company but there is no evidence that sales agents and business partners are covered.

Reporting

Ecopetrol reported that in 2015, 247 complaints received were related to corruption of which 18 complaints were corroborated. Regarding the corroborated cases, 14

were transferred to the Disciplinary Control Unit, three cases were transferred to the process owner areas, and one case was closed upon the signing of a record of commitment.

A review of stakeholders' sources revealed that the Company is involved in isolated or occasional controversies of minor or significant severity

As of 11/2016, Ecopetrol S.A. was involved in 1 controversy

 **Stakeholders' feedback**

- Case 1 (16/06/2015): Authorities Charge Six People linked to Ecopetrol With Bribery in Colombia

A complete analysis of the severity of each case mentioned is available in Vigeo Controversy Product.

**Company's responsiveness**

Overall, the company is non-communicative

For each of the above mentioned cases, Ecopetrol S.A.'s response is considered:  
- case 1: The company is non communicative: the company denies the facts without further explanations OR only provides vague and general statements on the case

The analysis of Ecopetrol S.A. management of each case is available in Vigeo's controversy profile.

<b>Leadership</b>	<b>72</b>
Visibility	65
Relevance	65
Ownership	100

<b>Implementation</b>	<b>67</b>
Means & resources	82
Coverage	30

<b>Results</b>	<b>32</b>
Performance	32

## C&S3.2 **Prevention of anti-competitive practices** (deactivated)

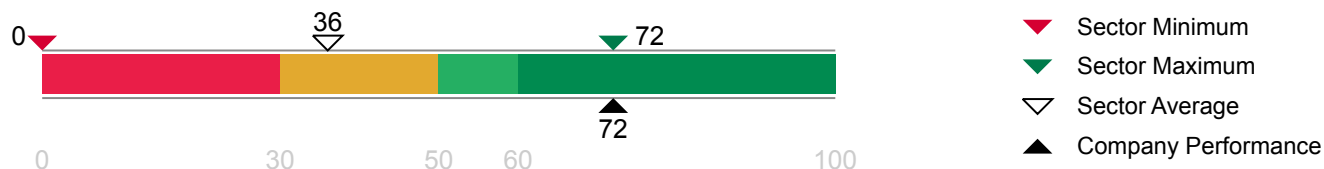
This Sustainability Driver is only analysed for large companies in the Energy Emerging Market sector. It is therefore not analysed for this company.

Corporate governance

Score: 56

CGV1.1 Board of Directors

(score: 72, weight: 3)



**[LISTED COMPANIES] Existence and independence of Nomination Committee** *Three members of the four-member Nomination Committee are considered independent.*

**Independence of the Board Chairman** *The roles of Chairman and CEO are separated, and the Chairman is considered independent.*

**Responsibility allocated over CSR issues** *There is a Corporate Governance and Sustainability Committee that is part of the board. One of its functions is to follow up on the Corporate Social Responsibility and recommend improvement in the CSR implementation.*

**Share of independent shareholder-elected Board members** *Six members of the eight-member Board are considered independent.*

**Diversity of the skills and backgrounds of the Board** *The Board of Directors diversity appears to be partial:  
- Board members with demonstrated professional experience in the company's sector of activities: The board has members with professional experience in Hydrocarbon Production and Exploration & Production Business Economics.*

**Training and expertise provided to board members** *The company states that board members attend training and update sessions scheduled by management in matters that reportedly enrich and strengthen their role as Directors. There is no information on the regularity of these trainings.*

**Regular election of Board members** *Board members are elected at the annual shareholders' meeting for a one-year term, and may be reelected.*

**Evaluation of Board's functioning and performance** *Ecopetrol stated that its Board of Directors are assessed every two years by a third party. The company disclosed the results of the evaluation in 2014.*

**Review of CSR issues at Board meeting** *Only few of the relevant CSR issues appear to be discussed at Board level:  
- Corruption prevention: Matters relating to the ethics and compliance process were discussed at Board level.*

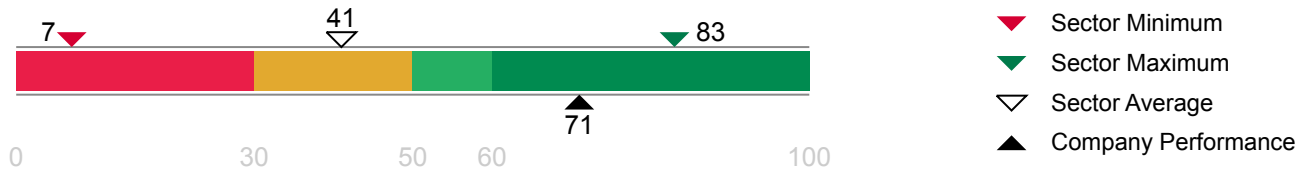
## Regularity of and attendance at Board meetings

16 Board Meetings were held in 2015 and the attendance rate was 92.1%

Name of Board member	Role	Executive	Non executive	Employee representative	Nomination	Audit	Remuneration	Former executive	> 9 years on Board	Stock options	Paid > 1/2 executive salary	Represent > 3% company's shares	Other	Independency
Mauricio Cárdenas					X		X					X	Minister of Finance and Public Credit Considered as non-independent by the company	
Simón Gaviria												X	Director of the National Planning Department Considered as non-independent by the company	
Carlos A. Cure Cure	President Board		X		X		X							X
Jorge Pinzon Snachez			X			X								X
Joaquin Moreno			X		X		X							X
Jaime Ardilla Gomez	Chair, AC		X			X								X
Horacio F. Rueda			X			X								X
Roberto Steiner	Chair, RC NC		X		X		X							X

**CGV2.1 Audit & Internal Controls**

(score: 71, weight: 2)



**[LISTED COMPANIES] Existence and independence of Audit Committee** *All four members are independent non-executive directors.*

**Skills and backgrounds of Audit Committee members** *Members appear to have financial experience and relevant operational experience.*

**Operational and CSR risks covered by the company's internal controls system**

*The internal control system covers the standard issues related to financial, operational, and legal risks. In addition, the system covers some of the CSR risks inherent to the company's business operations:*

- *Corruption prevention: The company covers risks associated with failure in ethics and compliance*
- *Pollution prevention: The company covers risks associated with incidents due to operational causes or natural events.*

**Role of the Audit Committee in overseeing internal and external controls**

The Audit Committee has a comprehensive role that includes:

- Oversee internal audit and internal controls
- Review accounting policies and be responsible for updates
- Nominate the statutory auditor
- Oversee the work of the external auditor
- Approve the type of audit and non-audit services provided and fees paid to the external auditor

**Management of the CSR risks**

*Relevant processes dedicated to management of CSR risks are in place:*

- *Monitoring of key risk indicators: Ecopetrol reported in its 2015 Sustainability Report that it monitors key risk indicators and its materialisation.*
- *Reporting system to the Board: Ecopetrol stated the materialised risks are presented to the steering committee and the Risk committee of the board.*
- *Risk mapping/materiality assessment: In 2015, Ecopetrol implemented a risk map that contained two CSR risks out of the 11 risks that were identified.*

**Independence of the firm's external auditors**

*Non-audit fees represented 6.9% of total fees paid to PricewaterhouseCoopers Ltda in 2015.*

**Inclusion of CSR issues in the company's reporting**

*The company publishes significant CSR reporting on key material issues, with an independent third party assessment of the reliability of key performance indicators in accordance with the AA1000AS standards, with moderate level of the assurance.*

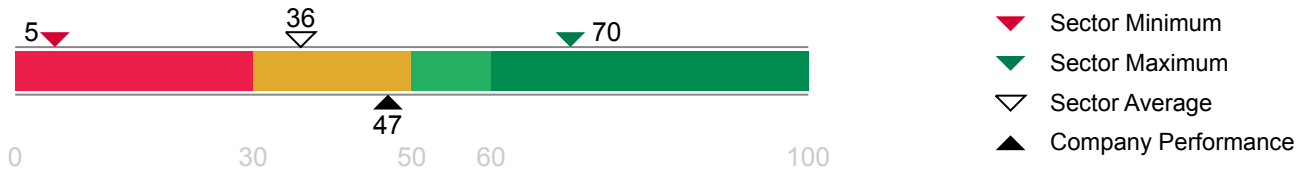


## Stakeholders' feedback

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral

**CGV3.1 Shareholders**

(score: 47, weight: 2)



**Nonexistence of voting rights restrictions**

The company respects the "one share - one vote" principle.

**Safeguards on transactions with major shareholder(s)**

More than half of the board is independent. However, there are no additional safeguards in place to monitor transactions between the company and its major shareholder(s).

**Ability to add items to the agenda of the AGM and to convene an EGM**

No major restrictions have been identified.

**Access to voting at General Meetings**

There are no major restrictions on shareholders' ability to vote, however there is no possibility of voting through online services.

**Ability to vote on relevant issues in separate resolutions at AGM**

*The following items are not put to a vote at the AGM:*  
 - Board fees  
 - Executive remuneration  
 - Changes in capital (increase, buy-backs)

**Presentation of CSR strategy to shareholders and investors**

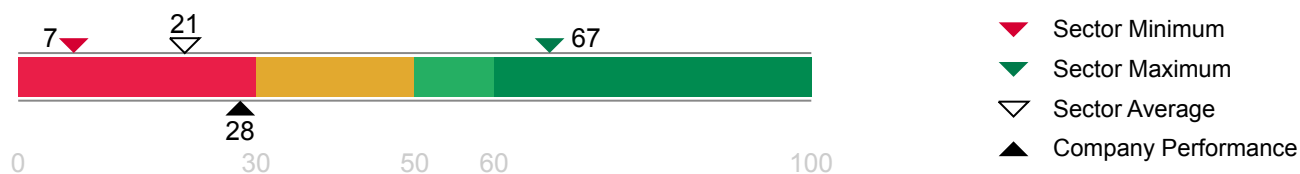
*Information disclosed from the entity and public sources regarding the presentation of CSR strategy to shareholders and investors is insufficient.*

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral

CGV4.1 Executive Remuneration

(score: 28, weight: 2)



**[LISTED COMPANIES] Existence and independence of Remuneration Committee** *Three members of the four-member Remuneration Committee are considered independent.*

**Disclosure of senior executives' individual remuneration**

Disclosure of individual executive remuneration data for senior executives is insufficient.

*Ecopetrol only disclosed the minimum and maximum base integrated salary of the senior executives.*

**Link between Short Term Incentive Plans and the performance of the company**

*Bonuses are linked to predetermined and disclosed economic and operational performance indicators:*

- return on investment
- profit
- addition of reserves
- indicators on environmental impact
- accident rates

*However the actual quantified targets are not disclosed.*

**Link between the main Long Term Incentive Plan and the performance of the company**

Information on the rules and performance conditions guiding the allocation of long-term incentives to senior executives is insufficient.

**Link between variable remuneration and CSR performance of the company**

*CSR performance objectives are considered in the determination of variable remuneration of senior executives:*

- Health and safety
- Pollution prevention

*but information on performance targets are not disclosed.*

**Severance pay for senior executives**

*Information obtained from the company and public sources regarding severance pay for senior executives is insufficient.*

**Evolution of CEO-to-employee compensation ratio**

*The ratio of CEO compensation vs average employee salary has increased between the two year period of 2014-2015. This information available in the public is not sufficient to determine a trend.*

**Stakeholders' feedback**

A review of stakeholder sources did not reveal any allegations against the company during the period under review: stakeholders' feedback is neutral

## Detailed Scores and Ratings

### CURRENT AND PREVIOUS RATINGS

Period	Environment	Human resources	Human rights	Community involvement	Business behaviour (C&S)	Corporate governance
2016/11	+	+	++	+	++	+
2015/09	+	++	++	++	++	++
2014/11	-	=	+	+	+	=

### SCORES PER DOMAIN

Domain	Average Score	Leadership	Implementation	Results
Environment	47	51	43	35
Human resources	45	55	39	41
Human rights	53	72	46	42
Community involvement	55	52	82	30
Business behaviour (C&S)	60	62	66	52
Corporate governance	56	71	50	49

### SCORES PER CRITERIA

Sub-domain	Criterion	Score
Environment 1	1	48
	2	42
	3	N/A
	4	57

Sub-domain	Criterion	Score
Environment 2	1	N/A
	2	40
	4	N/A
	5	N/A

Sub-domain	Criterion	Score
Human resources 1	1	N/A
Human resources 2	3	12
	4	63
Human resources 3	2	56

Sub-domain	Criterion	Score
Human rights 1	1	65
Human rights 2	1	34
	4	57

Sub-domain	Criterion	Score
Community involvement 1	1	52
	2	62

Sub-domain	Criterion	Score
Business behaviour (C&S) 1	1	N/A
	3	N/A
Business behaviour (C&S) 2	4	65
	1	57
Business behaviour (C&S) 3	2	N/A

Sub-domain	Criterion	Score
Corporate governance 1	1	72
Corporate governance 2	1	71
Corporate governance 3	1	47
Corporate governance 4	1	28

## Contacts

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## Overview of the latest updates

Date of the latest update	Information updated
2018/07	Carbon & Energy Transition
2018/06	Controversy Risk Assessment
2017/09	Controversial Activities Screening
2017/08	Sustainable Goods & Services
2016/11	<b>Full ESG profile</b>

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