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| Código de Conducta para Proveedores | |
| Departamento: Legal | Área: Legal |
| Tipo de Documento: Policy | Código: 75.050.021 PO |

SUPPLIER CODE OF CONDUCT

I. INTRODUCTION

At SierraCol Energy Limited and its subsidiaries (the “Company”), we are committed to conducting our business in a manner that safeguards our employees, protects the environment, benefits neighboring communities, and strengthens local economies. We demand integrity and personal accountability at every level with an unwavering commitment to safety and environmental stewardship. As a supplier, service provider, or vendor of the Company ("Supplier"), we expect you to act with honesty and strong moral principles while conducting business dealings, by adopting ethical and sustainable practices in your operations.

This Supplier Code of Conduct (the “Supplier Code”), which is aligned with the Company’s Code of Business Conduct (the “Code”), sets forth the minimum principles and guidelines we expect our Suppliers to abide by and implement to conduct business with the Company or for or on behalf of the Company. All Suppliers are required to comply with applicable laws and regulations and this Supplier Code goes beyond mere compliance with law. When differences arise between Company standards (including this Supplier Code) incorporated in Suppliers’ agreements with the Company and legal requirements, the stricter standard shall apply, in compliance with applicable law.

The Supplier Code affirms our collective obligation to high standards of conduct and reinforces our business ethics, policies, and procedures regarding compliance with laws and regulations, corruption and bribery, Human Rights, social and working conditions, communities and the environment.

While we recognize Suppliers are independent, your role in the Company’s operations is crucial, and our goal is to work with our Suppliers to ensure full compliance with the principles contained within this Supplier Code. Suppliers are expected to understand and comply with this Supplier Code and to educate their own employees, agents, subcontractors, and suppliers (the “Supplier Related Persons”) to ensure they also understand and comply with this Supplier Code. If a Supplier knows, or has reason to believe, that a violation by it or a Supplier Related Person has occurred, then the Supplier must promptly inform the Company. Suppliers are expected to self-monitor and enforce compliance with this Supplier Code by Supplier Related Persons. We also expect Supplier’s directors to guide by their example promoting a culture that respects and protects the guidelines set forth in the Supplier Code.

The Company will consider compliance with this Supplier Code in its procurement decisions. If the Company determines that a violation of this Supplier Code has occurred, the Company reserves the right to impose penalties, or even terminate the relationship with the Supplier, without prejudice to any other contractual, legal or administrative actions that may apply. Violations of this Supplier Code will be evaluated on case by case basis in accordance with applicable law and the Company’s internal policies and procedures.



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1. How to Use this Supplier Code

The Supplier Code cannot address every situation that may arise and should be used as a resource for general guidance. Read this Supplier Code in its entirety and think about how it applies in all that you do for the Company. When confronted with a difficult situation, ask yourself the following questions before taking action:

- Is this action legal, ethical, and socially responsible?
- Does this action comply with both the spirit and the letter of the Supplier Code?
- Will this action appear appropriate when viewed later by others?
- Is it clear that the Company and/or the Supplier would not be embarrassed or compromised if this action became known within the Company, the Supplier, or publicly?

Unless you can answer these questions with a “yes,” do not take the action and ask the Company for further guidance.

2. How to Report a Concern or Ask a Question

Suppliers and Supplier Related Persons are encouraged to ask questions to the Company and expected to report concerns of suspected or actual violations of laws, policies, regulations, this Supplier Code and other applicable Company policies. Raising such concerns protects the Company, the Supplier, the Supplier Related Persons, and other stakeholders.

If a Supplier Related Person knows of an unsafe work practice in place by a Supplier, they are also encouraged to report this occurrence to one of the reporting channels listed below. As discussed below, the Company prohibits Suppliers from retaliating against anyone who brings questions or concerns forward in good faith.

The Company has established several reporting channels:

- Integrity Helpline:** You can use the Company’s Integrity Helpline to raise concerns. This Helpline is maintained by an independent third party that immediately refers all reports it receives to the Compliance Officers. The Helpline is available via an online reporting site www.lighthouse-services.com/Sierracol and by phone Toll-Free: 01-800-911-0011, the operator will ask you to enter your number, dial 800-603-2869 and follow the instructions. Information can be provided on an anonymous basis to the Integrity Helpline.
- Compliance Officer:** You can contact the Company’s Compliance Officer directly via email at Etica-Colombia@Sierracol.com



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3. Review of Questions and Concerns

We are committed to reviewing and responding to all matters that may violate our ethical and compliance standards contained in this Supplier Code and the Company's Code and policies. This includes reviewing all concerns that are raised to the Company and determining the appropriate course of action.

4. Cooperation and Confidentiality

The Company expects Suppliers and Supplier Related Persons to cooperate with and provide requested information to facilitate an effective investigation. All reports will be treated confidentially to the fullest extent possible, consistent with applicable legal requirements and the need to conduct an adequate investigation or review.

5. Non-Retaliation

The Company will not tolerate threats or acts of retaliation against persons for asking a question, raising a concern in good faith or cooperating in an internal investigation. All forms of retaliation are prohibited, including any form of discipline, reprisal, intimidation, or other form of retaliation taken against an employee who has acted in good faith. Threats of retaliation should be reported immediately.

6. Compliance with this Supplier Code; Right to Audit

The Company reserves the right to monitor Supplier's compliance with this Supplier Code. This may include onsite audits of you or your subcontractor's, facilities and other operations. As part of these audits, the Company or its agents may (a) inspect, examine, audit and copy your books and records, files, data and systems, in person and through remote virtual access, (b) interview individuals who may have information relevant to the audit, (c) audit and review your operations, practices, policies, and procedures and (d) inspect your facilities; provided, however, in each case, these audit rights are limited to those things that the Company reasonably considers related to Supplier's compliance with this Supplier Code in relation with the services and/or products provided to the Company. The Company may also require similar rights with respect to your suppliers or subcontractors. Monitoring your performance against this Supplier Code may also include document requests related to the traceability of raw materials and certifications verifying internal processes and procedures. By doing business with the Company, you agree to respond to any request in a timely manner and to the best of your abilities. Suppliers must keep and maintain accurate books and records necessary to demonstrate compliance with applicable law and this Supplier Code and retain these records at least for the term of your agreement with the Company or as required by applicable law and the agreement.



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II. SUPPLIERS CONDUCT GUIDELINES

1. Compliance with Laws and Regulations

We aim to conduct our business in accordance with all applicable laws, rules and regulations and in a manner that reflects the highest ethical, legal, environmentally, and socially responsible and sustainable standards. Therefore, Suppliers must understand and comply with the laws, rules, regulations and policies applicable to your responsibilities and locations when doing business with the Company. If a question or potential conflict with law arises, seek guidance from the Company or report the matter to the Company Compliance Officer immediately.

Suppliers must comply with all applicable national and international laws and regulations, including International Labor Organization (the "ILO") standards, whichever requirements impose the highest standards of conduct. Suppliers must operate in compliance with their own applicable professional standards, policies and codes, including requirements established by any organizations (such as licensing commissions) regulating their activities.

2. Doing Business with Integrity

Suppliers shall conduct their business in accordance with the highest ethical and human rights standards. Suppliers must comply with all applicable laws and regulations concerning corruption, bribery, fraud, and unfair and prohibited business practices, and are expected to adopt their own internal policies, procedures and controls to prevent, identify and correct any conduct that may violate the aforementioned.

The Company will not tolerate violations or circumvention of any applicable laws or regulations by a Supplier or a Supplier Related Person, nor will the Company tolerate the disregard or circumvention of any applicable laws or regulations or engaging in unethical dealings in connection with the Company's business.

2.1 Anti-Bribery and Anti-Corruption

The Company prohibits bribery in all forms. We expect Suppliers to comply with all applicable laws and regulations prohibiting bribery, corruption, fraud, and unfair and prohibited business practices, including the Colombian Anti-Corruption Act (Law 1474 of 2011), the Transnational Bribery Law (Law 1778 of 2016), the U.S. Foreign Corrupt Practices Act (FCPA), and the local laws that apply where we conduct business. Suppliers must implement monitoring, record keeping, and enforcement procedures to ensure compliance with anti-corruption laws. Should an event ever occur, you must be honest, direct and truthful in discussions with regulatory agencies and any government professionals. If compliance with



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the aforementioned laws and regulations is not legally required to Supplier, then we expect you to comply with their substance and intent, to the extent reasonably practicable.

We have a zero-tolerance policy for any form of bribery, corruption, extortion and embezzlement. The Company expressly prohibits corrupt promises, offers or payments made through third party intermediaries or by anyone acting for or on behalf of the Company. Bribes, kickbacks or other means of obtaining undue or improper advantage are not to be promised, offered, authorized or given to any company or employee or on our behalf. This prohibition covers promising, offering, authorizing or giving anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

ENGAGING IN ANY FORM OF BRIBERY OR CORRUPT ACTIVITY, DIRECTLY OR INDIRECTLY, IS STRICTLY PROHIBITED.

2.2 Anti- Money Laundering

Money laundering in all forms is strictly prohibited. Suppliers must comply with all applicable anti-money laundering laws. Company procurement, due diligence, vetting, and payment procedures also aid the Company in preventing acts of money laundering. Therefore, we expect Suppliers to cooperate with the Company in the application and execution of such procedures.

2.3 Gifts and Hospitalities

The Company encourages Suppliers not to provide gifts or hospitalities (which include meals, hotels, lodging, travel and entertainment) to Company employees, managers, or directors, their representatives or family members. The Company has strict policies for giving and receiving gifts or hospitalities that include detailed record keeping, certain thresholds and approvals in accordance with Company policies.

Suppliers must not provide gifts or hospitalities of any value to third parties, including government employees or officials in any location, on behalf of the Company or in relation to any good or service that is being provided or executed for the Company, unless expressly instructed by the Company and with the Company's prior written approval, which will be subject to applicable laws and regulations and the Company's policies. Any interaction with a third party, including government employees or officials that could have the appearance of impropriety in relations to goods or services provided to the Company must be avoided.

The Company expects Suppliers and Supplier Related Persons to exercise good judgement and moderation when giving or accepting gifts or hospitalities in business settings related to the goods or services that you provide to the Company. Gifts and hospitalities must have a legitimate business



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purpose, be reasonable and proportionate, be given openly and transparently, and properly recorded in the Suppliers' books and records.

2.4 Conflicts of interest

The Company expects Suppliers and Supplier Related Persons to act transparently, in good faith, by applying its good judgment to avoid situations that may interfere with or unduly influence their contractual obligations and responsibilities with the Company, that could constitute a potential or actual conflict of interest or be perceived as such.

All potential conflicts of interest, including close personal relationships, that could improperly influence or appear to improperly influence Suppliers or Supplier Related Persons business decisions in relation to the Company must be disclosed to the Company under the agreement(s). Suppliers must have mechanisms in place to ensure Suppliers' independence, ability to identify, report to the Company, and perform in the event of a potential or actual conflict of interest of a Supplier or Supplier Related Person.

2.5 Restrictive Trade Practices and Controls

The Company requires Suppliers to comply with the following in their business dealings with the Company:

- **Antiboycott Practices:** U.S. antiboycott laws, which prohibit U.S. companies and their controlled non-U.S. subsidiaries from engaging in any activity that could have the effect of promoting a boycott or restrictive trade practice not approved by the U.S. government.
- **Import and Export Controls:** All applicable export and reexport controls and import laws governing the movement of goods, technology, software and services across borders.
- **Trade Sanctions:** Economic and trade sanctions, or restrictions against certain countries, individuals, entities, vessels and activities. Trade sanctions imposed by organizations like the European Union or United Nations, may also restrict our business. If you identify goods or services potentially received or transferred through a sanctioned country, or conduct involving a sanctioned country, person or activity, you must immediately report to the Company.
- **Antitrust and Competition Laws:** Suppliers are expected to conduct business activities in accordance with all applicable antitrust and competition laws, as well as anti-fraud and fair business practices. Activities that include any form of an agreement or understanding with



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competitors to fix prices, to implement bid rigging, to allocate customers or restrict supplies are strictly prohibited.

3. Financial Reporting and Controls

Fair and accurate books and records are essential for compliance with anti-bribery laws, the management of our business, as well as the integrity of our financial reporting and public disclosures. Suppliers must maintain their books, records and accounts in reasonable detail, to accurately and fairly reflect their dealings with the Company and the delivery of goods and provision of services to the Company.

Suppliers have a responsibility to properly manage records in their dealings with the Company. As noted above, the Company may perform audits, directly or through third parties, of Supplier records related to their dealings with the Company and/or the provision of goods or services to the Company.

Suppliers' and Supplier Related Persons cooperation with all audits is required. Cooperation includes providing clear and truthful information during the audit and investigation process.

4. Information and Data

Suppliers should not disclose the Company's information to anyone unless the recipient is duly authorized to receive the information in order to carry out Company business.

Disclosure or misuse of the Company's intellectual property (such as inventions, improvements or ideas – whether or not eligible for patent, copyright, trademark or other protection – including that which may develop or learn about during Supplier's business dealings with the Company) is prohibited. Suppliers must respect the intellectual property rights and copyright protected material of others.

Suppliers must respect all regulations related to the protection of the personal data and privacy of all individuals, including their employees, community, customers, other Suppliers and any third parties.

Suppliers must take appropriate technical and organizational measures to ensure a level of security of their electronic systems appropriate to the risk in order to protect against all forms of cyber-attack or other intrusions that might result in the data of the Company or its clients or customers being lost, stolen or corrupted.



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Suppliers and Supplier Related Persons must care and preserve the image and reputation of the Company. Suppliers and Supplier Related Persons must abstain from providing information to or responding to inquiries from the press, media, investors or the general public, regarding its dealings with the Company, unless explicit written permission is given by the Company to do so. Any such inquiries should be immediately reported to the Company.

5. Human Rights and Working Conditions

The Company is committed to human rights as defined by the Universal Declaration of Human Rights, the Conventions of the ILO, the UN Guiding Principles on Business and Human Rights and the Voluntary Principles on Security and Human Rights.

Suppliers shall recognize and be committed to upholding the human rights (as defined by the aforementioned instruments) of their employees and treat them with dignity and respect as understood by the international community. Our Suppliers shall respect the following standards:

- **Human Trafficking and Forced Labor:** human trafficking, the use of forced, bonded, indentured or involuntary prison labor, or any other exploitative labor practices are strictly prohibited (collectively referred to as “forced labor”). By accepting engagement as a Supplier, you represent that you do not engage in any form of forced labor. Suppliers are expected to responsibly source any raw materials and products supplied to them and to not source materials that are produced, gathered or otherwise created using forced labor.
- **Freely Chosen Employment:** all work must be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty. Suppliers may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits, unless required by law. You are prohibited from collecting recruitment fees from your workers and you may not require workers to pay employers’ agents or sub-agents’ recruitment fees or other related fees for their employment.
- **Humane Treatment/ Disciplinary practices:** There is to be no harsh or inhumane treatment including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Any form of corporal punishment as disciplinary practice is strictly prohibited.
- **Child Labor:** Suppliers must not, under any circumstances, use child labor as defined by ILO and United Nations Convention and/or national law, whichever is more stringent.



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- **Compensation/ Minimum Living Wages:** workers shall be remunerated fairly with living wages. Suppliers must comply with all applicable laws, regulations, and industry standards concerning wages, overtime hours and benefits.
- **Maximum Working Hours:** Suppliers shall comply with all applicable laws, regulations, and industry standards on working hours.
- **Non-Discrimination:** your workplace must be free of unlawful discrimination. Suppliers must not engage in discrimination in hiring and employment practices, such as wages, promotions, rewards, and access to training, based on race, religion, age, nationality, color, gender, sexual orientation physical ability, health condition, political opinion, creed or other basis prohibited by law.
- **Non-Harassment:** your workplace must be free of harassment. Suppliers must not tolerate any manifestation of harassment, including through violence, exploitation or sexual harassment, or abuse of authority (or threats thereof). Suppliers must provide employees with working conditions free of any form of intimidation, harassment or abuse.
- **Freedom of Association and the Right to Collective Bargaining:** Suppliers must respect the rights of employees to form and join trade unions and bargain collectively.
- **Zero-tolerance policy for any form of extortion:** Suppliers must not pay or contract insurances to cover extortion and kidnapping risks. Suppliers must comply with the national legislation and due diligence standards in security and human rights related to these prohibitions.

6. Health & Safety

Suppliers shall provide their employees with a safe and healthy workplace in compliance with all applicable laws, regulations, and industry standards. Suppliers must also understand and support Company policies regarding health, safety, process risk management, environmental protection, and community involvement, applicable to their business relationship with the Company.

Worker potential for exposure to health and safety hazards are to be identified, assessed, and mitigated. Suppliers are expected to provide ongoing occupational health and safety training as applicable to their business.

Suppliers shall provide their employees with acceptable living conditions when they are required to stay in camps, fields or other areas to execute work. Suppliers must provide adequate working facilities, fire safety, personal protection equipment, access to emergency medical care, and adequate lighting and ventilation. When on the Company's premises, Suppliers must immediately report any accidents, unsafe



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practices or conditions, and any potential noncompliance with applicable laws, regulations or Company policies and procedures to the Company.

7. Environment and Communities

The Company recognizes that environmental and social responsibility is integral to producing high quality products and services. By agreeing to conduct business with the Company, Suppliers agree to work together with the Company to select products and services that minimize environmental impacts. Suppliers are expected to take reasonable efforts to identify the environmental impacts of their business and minimize adverse effects on the community, environment and natural resources.

Suppliers must comply with all applicable environmental laws, regulations, and industry standards, such as maintaining applicable environmental permits and environmental reporting. The Company retains the right to issue additional environmental requirements specific to the products or service being provided to the Company. Suppliers must implement and maintain effective environmental and social policies to meet these requirements.

Open and honest dialogue with communities and stakeholders is a fundamental principle of community relations in Company operations. Company expects Suppliers to be committed to local communities' development and participation. Suppliers must openly and transparently communicate with communities regarding local labor and commercial opportunities and provide channels for the reception and attention of claims, doubts and concerns by any interested person. Suppliers shall abstain from entering into any agreement that may be contrary to the provisions of this Code.

8. Communications and Implementation

The Company will provide a copy of the Supplier Code to Suppliers and appropriate communications regarding this Supplier Code. As noted above, Suppliers must effectively communicate to all Supplier Related Persons the content of this Supplier Code and undertake actions necessary and appropriate to assure its implementation and their compliance.

III. CERTIFICATION OF COMPLIANCE

By its acceptance of any purchase order or contract from the Company, Suppliers thereby acknowledge and certify their compliance with the principles and requirements of this Supplier Code. A Compliance Certification substantially in the form of **Annex I** attached hereto must be signed by a duly authorized representative of the Supplier and returned to the assigned Company contact alongside with the agreement.



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IV. MISCELLANEOUS

1. Development of this Supplier Code

The Company will review this Supplier Code on a regular basis and will introduce revisions where necessary or appropriate. The Company will notify Suppliers of any significant changes.

2. No Third-party Beneficiaries

This Supplier Code does not confer, and shall not be deemed to confer, any rights on the part of any third party. No representative of any Supplier of any other person shall have any rights against the Company by virtue of this Supplier Code, nor shall such representatives or other persons have any rights to cause the Company to enforce any provisions of this Supplier Code, such decisions being reserved by the Company in its sole discretion.



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**ANNEX I
COMPLIANCE CERTIFICATION**

We, the undersigned, hereby confirm:

1. That we have received and understand the Company's Supplier Code of Conduct (the "Supplier Code") and commit ourselves to fully comply with its principles and requirements.
2. That we agree that the Company or third party appointed by the Company may carry out periodic, unannounced inspections/audits on our facilities and records to verify our compliance with the Supplier Code.
3. That we effectively communicate the contents of the Supplier Code to our employees, agents, subcontractors, and suppliers and ensure measures to guarantee compliance with the Supplier Code's principles and requirements are implemented accordingly.

We also acknowledge our understanding that compliance to the Supplier Code is an essential prerequisite for business relations between the Company and Supplier. If the Company determines that a violation of this Supplier Code has occurred, we acknowledge the Company's right to impose penalties, up to and including termination of the business relationship, without prejudice to any other contractual, legal or administrative actions that may apply.

In witness thereof, on this _____, 20____.

Signature:

Name of Supplier:

Supplier's representative:

The Compliance Certification must be signed by a duly authorized representative of the Supplier and returned to the assigned Company contact alongside with the agreement.