



Tipo de documento:	Human Rights Policy
Nº de documento:	20.100.001 PO
Última fecha de revisión:	17/5/2022
Fecha efectiva:	17/5/2022
Preparada por:	Diana Vásquez
Aprobada por:	Board of Directors
Fecha de aprobación:	17/5/2022

HUMAN RIGHTS POLICY

1. PURPOSE

This Policy declares the commitment of the Company, regarding the respect and promotion of Human Rights.

Respecting and promoting Human Rights is not only central to SierraCol Energy's values of integrity, sustainability, and people, but also fundamental in order to achieve its mission of responsibly developing energy resources to create value for its stakeholders.

2. SCOPE

This Policy applies to all Company Employees, Officers, and Directors. The Company communicates this Policy as well as its expectations regarding the respect and promotion of Human Rights to all its Contractors and joint venture partners.

3. DEFINITIONS

Company — SierraCol Energy Limited and any subsidiary or entity in which it directly or indirectly owns or controls a majority voting and/or equity interest.

Employee — Individuals paid through Company payroll including officers and executives of the Company.

Contractors — Any contractor or supplier providing a service or product to the Company.

Human Rights — For the purpose of this Policy, this term denotes those rights and freedoms that have been universally recognized as such in international and national law, as further defined in section 4 of this Policy.

Stakeholders — Those persons and institutions with a direct interest in the way the Company conducts its business, including Employees, Contractors, governmental entities, non-governmental organizations, and the communities located in the areas in which the Company conducts its business.

Sustainable Development Agenda – As defined by the United Nations (UN), this agenda highlights the importance of harmonizing economic growth, social inclusion, and environmental protection to achieve sustainable development worldwide.



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4. POLICY

An integral part of SierraCol Energy’s ethical standards is to respect and promote Human Rights within the spheres of the Company’s activity and influence. Our Code of Business Conduct firmly supports our commitment to respect Human Rights.

We are committed to respecting Human Rights as set out in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights), as well as with the following Human Rights standards:

- ILO Declaration on Fundamental Principles and Rights at Work
- ILO’s Indigenous and Tribal Peoples Convention (ILO 169)
- UN Declaration on the Rights of Indigenous Peoples
- UN Global Compact principles
- The UN Guiding Principles on Business and Human Rights (UNGPs)
- The Voluntary Principles on Security and Human Rights
- The Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises

We develop our business respecting the Human Rights of our Stakeholders and the environment. We are engaged to reduce our environmental footprint and increasing our positive social impact.

At SierraCol Energy, we support professional development and promote inclusion and diversity in the workplace. Particularly, we strongly believe that gender equality and women empowerment is essential to grow our business and contribute to achieve a more sustainable society.

We conduct due diligence processes not only to ensure that our employees and supply chain benefit from safe and fair working conditions, but also to avoid and prevent any kind of child labour, forced labour, human traffic and modern slavery practices.

Consistent with the UNGPs, in the case where local laws or practices may contradict international Human Rights standards, the Company will always adhere to the higher standard, unless they are in direct conflict, in which case the Company would adhere to national law while also seeking to respect international Human Rights standards, to the extent possible.

Addressing Human Right Impacts

We are committed to prevent risks and potential negative Human Rights impacts arising from our operations. As part of our due diligence, we conduct Human rights impact assessments, including security and Human Rights risks assessments when engaging with public forces.

We are committed to address and provide remedies to correct negative impacts that may arise from our operations. We incorporate the UNGP’s into the internal processes and procedures that guide



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our business, and we promote them along our value chain. We do not have tolerance for any violation of Human Rights caused by our Contractors.

We engage with international initiatives that aim to support Human Rights, including the Extractive Industries Transparency Initiative (EITI); and support national multi-stakeholders' initiatives that contribute to improve standards for Human Rights practices, especially in the jurisdictions of our operations. We also take into account the guidance and recommended Human Rights practices from organizations such as the UN Global Compact and IPIECA.

We strongly believe that our actions can generate significant positive impact, not only in the communities where we operate, but more broadly in society. For this reason, we are committed to engaging with strategic national and local partners to promote Human Rights and contribute to the Sustainable Development Agenda.

We believe it is important to proactively communicate to our Stakeholders our human rights Policy, commitments, and actions. We report annually to our Stakeholders, our progress in the implementation of this Policy consistent with the UNGPs.

4.1 Commitment to Stakeholders

The Company is committed to being attentive to concerns raised by Stakeholders, including those of the communities located in the areas in which we operate, and to work with its Stakeholders to support Human Rights within the spheres of the Company's activity and influence.

The Company is committed to monitoring and reporting on Human Rights impacts and has various feedback mechanisms to provide Stakeholders with the ability to raise concerns, when necessary, including through the Company's anonymous hotline, as described in the Company's Code of Business Conduct.

4.1.1. Employees —The Company is committed to promoting an inclusive, equal, and diverse workplace, that is free from harassment and discrimination on the basis of race, gender, age, national origin, marital status, sexual orientation, religion, disability, or membership to any political, religious, or union organization.

We protect the health and safety of our Employees; respect their rights and dignity; offer an adequate compensation; provide equal opportunities and promote personal development through appropriate training.

Aligned with our commitment to respect ILO labour standards, we respect the rights of freedom of association and collective bargaining.

We promote the respect for Human Rights and provide training on this Policy to our Employees.

4.1.2. Contractors— The Company is committed to promoting respect for ethical conduct and Human Rights with its Contractors.



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We communicate our expectations regarding human rights to our Contractors.

As part of our due diligence, we conduct human rights risk assessments, particularly to avoid child labour, forced labour, human traffic, modern slavery, and any form of discrimination in employment and occupation. Annually, we audit selected Contractors to ensure our supply chain adequately and responsibly manages security and Human Rights risks, complying with the policies and clauses included in our commercial agreements.

We work with our private security contractors to promote understanding and implementation of the Voluntary Principles on Security and Human Rights, including proper hiring and training to their employees.

4.1.3. Communities — The Company is committed to respecting the cultural values of the communities in which it operates, including the indigenous peoples recognized by applicable law; to giving appropriate regard to the self-sufficiency, sustainability, health, safety and the environment of such communities. To the extent consistent with the laws of the applicable jurisdiction, the Company is committed to consulting with, and seeking the pre-approval of, recognized local communities affected by its business operations in order to minimize, or cooperate in the remediation of potential negative impacts on such communities of such operations. We also support and respect the Human Rights of other minority groups which may be particularly vulnerable to adverse impacts.

We respect and recognize the work of community leaders, environmental activists and Human Rights defenders.

We promote social dialogue with the communities to understand their concerns; provide an accessible grievance mechanism; and seek to engage through an effective and inclusive system to manage their requests, claims or complaints related to human rights.

4.1.4. Governmental institutions and Non-Governmental Organizations – The Company is committed to engaging with Governmental institutions and Non-Governmental Organizations to support Human Rights.

5. GOVERNANCE AND IMPLEMENTATION

The CEO and the officers and executives of the Company will oversee and follow-up progress in the implementation of this Policy. Additionally, they will allocate the appropriate resources for the proper implementation of this Policy.

The Vice Presidency of Sustainability will be responsible for directing, implementing and enforcing this Policy, including delegation and collaboration with other Company functions and local operations.



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6. RELATED POLICIES

Code of Business Conduct

Speak-Up and Non-Retaliation Policy

Other policies on Security; Employment; Health, Safety and Environment; Social Responsibility; and Inclusion and Diversity, also contain human rights commitments.

7. VIOLATIONS OF THIS POLICY

If the Company determines that a violation of this Policy has occurred, the Company may impose discipline, as appropriate, which may include training, written or oral warnings, probation, suspension, reassignment, or contract termination.