



Human Rights Policy	
Department: Corporate Affairs	Area: Government Affairs
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## HUMAN RIGHTS POLICY

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## 1. PURPOSE

This Human Rights Policy (the "Policy") declares SierraCol Energy's commitment to respecting and promoting Human Rights.

Respecting and promoting Human Rights is not only fundamental for the fulfillment of SierraCol Energy's values of Integrity, Sustainability, and People, but also to achieve its mission of responsibly developing energy resources to create value for its stakeholders.

## 2. SCOPE

This Policy applies to all Employees, officers and members of the Board of Directors of the Company. The Company communicates this Policy and its expectations regarding the respect and promotion of Human Rights, to all its Contractors and partners.

## 3. DEFINITIONS

**Company or SierraCol Energy:** SierraCol Energy Limited and any subsidiary or entity in which it directly or indirectly owns or controls a majority and/or shareholding interest.

**Employee:** Persons paid through the Company's payroll, including Company officers and executives.

**Contractors:** Any contractor or supplier that provides a service or product to the Company.

**Human Rights:** For the purposes of this Policy, this term means those rights and freedoms universally recognized as such in international and national law, as defined in detail in Section 4 of this Policy.

**Stakeholders:** Individuals and institutions with a direct interest in the way the Company conducts its business, including Employees, Contractors, government entities, non-governmental organizations, and communities located in the areas in which the Company operates.

**Agenda for Sustainable Development:** 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 in the world.

## 4. POLICY

An integral part of SierraCol Energy's ethical standards is to respect and promote Human Rights within the Company's activities and areas of influence. Our Code of Business Conduct strongly supports our commitment to respecting Human Rights.

We are committed to respecting Human Rights as set out in the International Bill of Human Rights (which consists 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 the following Human Rights standards:

- ILO Declaration on Fundamental Principles and Rights at Work
- ILO Convention on Indigenous and Tribal Peoples (ILO 169)
- UN Declaration on the Rights of Indigenous Peoples



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- Principles of the UN Global Compact
- UN Guiding Principles on Business and Human Rights (hereinafter UNGPs)
- Voluntary Principles on Security and Human Rights
- Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises

We conduct our business respecting Human Rights and the environment. We are committed to reducing our environmental footprint and increasing our positive social impact.

We are especially committed to respecting and promoting the social, economic, and cultural rights of vulnerable populations and ethnic communities, including indigenous and Afro-descendant communities, among others.

We promote and apply good practices of due diligence in Human Rights, we respect and abide by applicable international and national regulations related to the right to prior and informed consultation.

We recognize and value social leadership in our territories of operation.

At SierraCol Energy, we support professional development and promote inclusion and diversity in the workplace. We strongly believe that gender equality and women's empowerment are essential to promote the growth of our business and contribute to a more sustainable society.

We carry out 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 form of child labor, forced labor, human trafficking, and modern slavery practices.

In accordance with the UNGPs, in the event that local laws or practices contradict international human rights standards, the Company will always adhere to the highest standard, unless they are in direct conflict, in which case the Company will abide by the national legislation, and at the same time, it will seek to respect international human rights standards, as far as possible.

### **Human Rights impact management**

We are committed to avoiding risks and possible negative impacts on Human Rights that may arise from our operations. As part of our due diligence, we undertake Human Rights impact and security and Human Rights risk assessments in our relationship with the public force.

We are committed to addressing and resolving the negative impacts that may arise in the development of our operations. We incorporate UNGPs into the internal processes and procedures that guide our business, and promote them throughout our value chain. We do not tolerate any violation of Human Rights by our Contractors.

We participate in international initiatives that aim to promote Human Rights, including the Extractive Industries Transparency Initiative (EITI). We also support national multi-stakeholder initiatives that contribute to improving good practices in Human Rights, especially in the areas of our operations. We also adopt Human Rights guidelines and recommendations from organizations such as the United Nations Global Compact and the IPIECA initiative.

We strongly believe that our actions can generate a significant positive impact, not only in the communities in which we operate, but also more broadly in society. Accordingly, we are committed to

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our strategic national and local partners to promote Human Rights and contribute to the Agenda for Sustainable Development.

We believe it is important to proactively communicate our Human Rights policy, commitments, and actions to our Stakeholders. We report annually to our stakeholders on the progress in the implementation of this Policy, in accordance with the UNGPs.

#### 4.1 Stakeholder Engagement

The Company is committed to addressing concerns raised by stakeholders, including those of communities located in the areas in which we operate, and to working with our Stakeholders to support Human Rights in the Company's areas of activity and influence.

The Company is committed to monitoring and reporting on Human Rights impacts and has several feedback mechanisms in place for Stakeholders to raise concerns, when necessary, including the Company's anonymous hotline, as outlined in the Company's Code of Business Conduct.

**4.1.1. Employees:** The Company is committed to promoting an inclusive, equitable, and diverse workplace that is free from harassment and discrimination based on race, gender, age, nationality, marital status, sexual orientation, religion, disability, or membership in any political, religious, or trade union organization.

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

In line with our commitment to respect ILO labor standards, we respect the rights to freedom of association and collective bargaining.

We promote respect for Human Rights and offer regular training on this Policy to our Employees.

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

We communicate our expectations regarding Human Rights to our Contractors.

As part of our due diligence, we conduct Human Rights risk assessments, especially to prevent child labor, forced labor, human trafficking, modern slavery, and any form of labor discrimination. Annually, we select and audit our Contractors to ensure that our supply chain adequately and responsibly manages security and Human Rights risks, complying with the policies and clauses included in our business agreements.

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

**4.1.3. Communities:** The Company is committed to respecting the cultural values of the communities in which it operates, including indigenous peoples recognized by applicable law, adequately serving the self-sufficiency, sustainability, health, safety, and environment of such communities. To the extent permitted by law, the Company is committed to conducting prior consultation processes with ethnic communities that have been recognized and are impacted by our operations. This, in order to minimize or cooperate in the remediation of the possible negative impacts that this type of operations have on these



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communities. We also support and respect the Human Rights of other minority groups who may be particularly vulnerable to negative impacts.

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

We promote social dialogue with communities to understand their concerns, provide an accessible grievance mechanism, and relate to them through an effective and inclusive system to manage their Human Rights-related requests, claims, or complaints.

**4.1.4. Government Institutions and Non-Governmental Organizations:** The Company is committed to engaging with Government Institutions and Non-Governmental Organizations to support Human Rights.

## 5. GOVERNANCE AND IMPLEMENTATION

The Company's CEO, officials, and executives will monitor and track progress in the implementation of this Policy. In addition, they will allocate appropriate resources for the proper implementation of this Policy.

The Vice Presidency of Corporate Affairs will lead, guide, and supervise the implementation of the Company's Human Rights Policy. Implementation will be carried out by the relevant areas.

## 6. REPORTING AND NON-RETALIATION

Any Employee who becomes aware of any incident related to the Company's operations that may potentially involve a violation of this Policy should report it through the communication channels described in the Code of Business Conduct. As set out in the Reporting and Non-Retaliation Policy, the Company strictly prohibits any form of retaliation against Company Employees for raising questions, making reports in good faith, or cooperating in an investigation.

## 7. RELATED POLICIES

Code of Business Conduct

Reporting and Non-Retaliation Policy

Security and Human Rights Policy

Other policies in relation to Physical Security; Employment, Health, Safety and Environment; Social Responsibility; and Inclusion and Diversity, also contain Human Rights-related commitments.

## 8. VIOLATIONS OF THIS POLICY

If the Company determines that a violation of this Policy has occurred, the Company may impose disciplinary action, as appropriate, which may include training, written or verbal reprimands, disciplinary sanctions, suspension, relocation, or termination of the employment contract.