



Speak-Up and Non-Retaliation Policy	
Departamento: Legal	Área: Legal
Tipo de Documento: Policy	Código: 75.050.004 PO

SPEAK-UP AND NON-RETALIATION POLICY

1. PURPOSE & SCOPE

The purpose of this Speak-Up and Non-Retaliation Policy (the “Policy”) is to provide guidance to employees of SierraCol Energy Limited and its subsidiaries (the “Company”) should they become aware of or suspect any violation of applicable laws and regulations, as well as any of the Company’s policies and procedures. This Policy applies to (i) the Company and all related entities, direct or indirect, and its (ii) directors, officers, and full- and part-time, temporary employees, and individuals acting on the Company’s behalf (collectively, “Personnel”).

Consistent with our commitment to ethical conduct and legal compliance, the Company encourages you to ask questions and requires you to immediately report concerns of suspected or actual violations of:

- Any applicable laws and regulations.
- The Code of Business Conduct (the “Code”), the Anti-Bribery and Corruption (ABC) Policy, and any other Company policies.
- Any other concerns involving ethics, compliance, fraud, bribery, transnational bribery and/or corruption; conflicts of interest; money laundering; financing of illegal activities; tax evasion; health, environmental management and safety; data breaches; unfair competition; accounting, internal accounting controls or auditing matters; and the creation of a working environment free from harassment and discrimination.

You must always speak up if you believe a violation has occurred. The Company strictly prohibits retaliation in any form against anyone who raises such issues in good faith.

2. POLICY

2.1 Speak-Up – Raising Questions or Concerns

One of our Company’s most valuable assets is its integrity – an unwavering commitment to acting honestly and ethically in all that we do and complying with all applicable laws and regulations. It is up to us to protect this asset, and it benefits each of us, our Company as a whole and our business partners if we ask questions and come forward with concerns promptly.

In order to maintain our Company’s commitment to ethical conduct and compliance with law in all that we do, each of us has a responsibility to remain attentive to situations that may violate the Code and to promptly raise concerns through available and appropriate channels. We understand it is not always easy to raise concerns about possible misconduct, but we encourage you to come forward should you have any concerns and speak up. By doing so, you give the Company the opportunity to review and address the issue. This is the best way to create a positive, open working environment.

2.2 How to Speak Up



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The Company has developed several channels for individuals to ask questions or report concerns:

1. **Integrity Helpline:** You can use the Company's Integrity Helpline to raise concerns confidentially. This Helpline is maintained by an independent third party that immediately refers all reports it receives to the Compliance Officer. The Helpline is available via an online reporting site www.lighthouse-services.com/Sierracol and by phone Toll-Free: from Colombia in Spanish 01-800-911-0011 (code 800-603-2869) or from Colombia in English 01-800-911-0010 (code 800-603-2869). Information can be provided on an anonymous basis to the Integrity Helpline.
2. **Supervisors/Managers:** As a general guideline, the first person to approach when raising a concern is your supervisor, manager, department head or any member of management with whom you feel most comfortable.
3. **Human Resources:** Human Resources is a further point of contact for you to raise concerns about suspected misconduct, for example if you prefer not to raise a concern with your Supervisor/ Manager.
4. **Compliance Officer:** You can contact the Company's Compliance Officer directly via email at etica-colombia@sierracol.com.
5. **Senior Management:** You may also report concerns directly to higher levels of management, including the Company's Chief Executive Officer and Chief Financial Officer.
6. **The Board of Directors:** You can make reports directly to the Board of Directors.

Additional contact information for these reporting channels can be found on the Company's intranet site.

Managers or supervisors who receive reports of potential fraud, corruption or other serious Code violations from subordinates should abstain from conducting their own investigation and promptly escalate such reports directly to the Compliance Officer. Reporting parties who wish to follow up or provide additional information regarding a pending report may contact the person the report was initially made to or the Compliance Officer, or follow up through the Integrity Helpline.

You are always welcome to make your complaint in any format with which you are comfortable (in person, in writing, online or by phone). While complaints may always be made anonymously and we will maintain confidentiality to the fullest extent possible, the Company encourages you to identify yourself so that you can be contacted for additional relevant information to assist any subsequent investigation.

To help the Company address your concerns more efficiently, you should provide as many details as possible. When making a report, please try to include:

- The background, history, and reason for the concern;
- Dates, places, and if possible people's names and other relevant information;



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- Examples of the behavior in question;
- Any documents that may be relevant to the situation, and
- If possible, whether you have already discussed the situation with someone else, and if so, with whom and when.

We encourage you to speak up as soon as possible, ideally before situations get out of hand or damage is done. You should raise all concerns that you encounter, regardless of your own judgment of their merit and even if you do not have all of the facts. It is imperative that reporting parties not conduct their own preliminary investigations. Such actions could compromise the integrity, independence or objectivity of an investigation and adversely affect the outcome.

The Company does not prohibit anyone from reporting concerns, making lawful disclosures, or communicating with any governmental authority about conduct believed to violate laws or regulations. We nevertheless encourage Personnel and any others wishing to raise concerns to speak up internally first using the various reporting channels described above.

2.3 Review of Questions and Concerns

The Company is committed to reviewing and responding to all matters that may violate our ethical and compliance standards. This includes conducting proper, fair, objective, and thorough investigations tailored to the circumstances, and taking appropriate remedial steps as warranted, including disciplinary action. The Company's Compliance Officer is responsible for reviewing all concerns that are raised to the Company and determining the appropriate course of action, including escalation to the Board of Directors if warranted.

All investigations into allegations of misconduct will be conducted in accordance with all applicable laws and policies. Actions taken by the Company in response to a question or concern will depend on the nature and severity of the situation. The Company may retain an outside resource, such as a law firm or accounting firm to supplement our internal resources. Results of any investigation will be reported to the Board of Directors as appropriate.

Remember, all good faith questions, concerns and reports raised under this Policy will be taken seriously.

2.4 Cooperation with Investigations

The Company expects employees to cooperate with and provide requested information to facilitate an effective investigation.

2.5 Retaliation Prohibited

The Company is committed to maintaining an environment that welcomes any reports about conduct that may violate laws, regulations, the Code or any Company policy. Retaliation constitutes a violation of this Policy and such conduct may result in disciplinary action, including termination.



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The Company will not tolerate retaliation of any kind in response to an individual who raises a question or concern in good faith. Any behavior that would prevent or reasonably dissuade an individual from raising or reporting good faith questions or concerns or participating in an investigation of such situations is also prohibited. Some examples of conduct that constitutes prohibited retaliation include:

- Adverse employment action affecting an employee’s salary or compensation.
- Changes to the terms or conditions of employment, such as suspension or termination of employment.
- Taking away opportunities for advancement.
- Deliberate exclusionary behaviors, such as excluding an employee from important meetings.
- Making actual or implied threats against an employee who has made a report.
- Intimidating an employee from making a report.
- Directing an employee who has made a report not to report to outside regulators.
- Rude or hostile behaviors or speech.
- Creating or allowing the creation of a work atmosphere that is hostile toward an employee who has made a report.

It is our policy to adhere to all applicable laws protecting our employees against unlawful discrimination or retaliation as a result of reporting concerns or participating in investigations regarding alleged unethical, illegal or fraudulent matters. If you are aware of an instance or threat of retaliation, please immediately report it.

2.6 Confidentiality

The Company treats all reporting of misconduct or suspected misconduct as confidential, and we will maintain confidentiality to the fullest extent possible, consistent with applicable legal requirements and the need to conduct an adequate investigation or review. In the course of an investigation, the Company may find it necessary to share information with others who have a legitimate need to know, and will do so with appropriate discretion, to ensure that the issues raised are properly reviewed and addressed. The Company’s efforts to maintain confidentiality may not, however, impede lawful rights to communicate with, make lawful disclosures to, or report potential violations of law or regulations to national, local or other government authorities.



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3. IMPLEMENTATION

The Compliance Officer is responsible for the implementation and enforcement of this Policy, including delegation to appropriate department personnel.

4. 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 termination according to the legal disciplinary procedure.

5. RELATED POLICIES

No.	Type	Title
75.050.001-PO	Code	Code of Business Conduct
75.050.002-PO	Policy	Anti-Bribery and Corruption (ABC) Policy
	Policy	SAGRILIFT