

## CODE OF CONDUCT

### CONFLICTS OF INTEREST AT DRUMMOND LTD.

Drummond Ltd. expects that the behavior of all its employees, providers, and contractors eliminates the risk of internal or external pressures that could compromise honest actions, and as a result, undermine the trust placed in them, so that this does not affect the quality of their work or harms the corporate image.

A conflict of interest exists when an employee, provider or contractor, when performing his or her job; or when applying for its registry as provider or contractor, participating in a bid, or when executing the objective of a contract, is influenced by personal considerations that do not go in line with Drummond Ltd.'s interests. This calls into question the objective performance and the effectiveness of its work, as well as its capacity, impartiality, reasonableness or integrity.

Any employee could become involved in a conduct that constitutes a conflict of interest, and therefore it is imperative to report to the Company any conflict of interest that could arise in relation to family relations that exist or could exist with other employees or candidates who are in the process of becoming involved with Drummond Ltd., including contractors and providers.

Following this reasoning, we must avoid people who have a family relationship to work within the same area, as well as one of them being under the direct or indirect supervision of the other, as we not only want employees, providers, and contractors to be loyal to the company, but also for this loyalty to be spontaneous, without pressure, and exempt from any conflict. If any of these situations arise, the employee or candidate has the obligation to fill out the Declaration of Conflict of Interest format, which must have the signature of his/her immediate boss, and must be filed with Human Resources, who will report the conflict to the Ethics Committee. The provider or contractor must inform the contact person at Drummond Ltd., who at the same time will follow the regular process mentioned before.

Family is considered to include spouses, permanent partners, and family members to a third degree of kinship (grandparents, parents, children, grandchildren, siblings, aunts



and uncles, and nieces or nephews), second degree of affinity (in-laws, spouses, or brothers or sisters in-law), adopters or adoptees.

It is the duty of employees, providers, and contractors to declare in its totality, and with full transparency, all current and potential conflicts of interest. They must complete and make public the declaration of conflict of interest at the beginning of their contractual relationship.

The declaration of conflict of interest must be presented to the immediate supervisor and Human Resources for their review by the Ethics Committee, who will make the proper decisions according to each case.

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