
 <b>DRUMMOND LTD.</b> <small>COLOMBIA</small>	<b>POLICY AGAINST BRIBERY AND CORRUPTION</b>	Version 2
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**POLICY AGAINST BRIBERY AND CORRUPTION**  
**SIG – 3268**


<b>Drafted</b>	COMPLIANCE COORDINATOR
<b>Reviewed</b>	COMPLIANCE OFFICER
<b>Approved</b>	PRESIDENT

TRACKED CHANGES		
Version	Date	Summary Description of the Change
1	November 2018	Creation of the policy
2	October 2020	General update to the policy

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## 1. OBJECTIVE

The objective of this policy is to define the general behavioral parameters that all Drummond Ltd. employees, suppliers and contractors must comply with in order to minimize the occurrence of situations associated with the risks of bribery and corruption, promoting and spreading a culture of ethics and legality within the company, in accordance with the corporate values defined in the Code of Conduct.

## 2. SCOPE

This policy is applicable to all the human team linked to Drummond Ltd. directly or indirectly, suppliers, and contractors and in general those third parties that have some type of contractual or commercial relationship or link with Drummond Ltd., who will be known.

## 3. DEFINITIONS

**Corruption:** Is the abuse of power for an undue benefit, whether personal or corporate.

**Fraud:** Is understood as the intended act or omission designed to deceive others, carried out by one or more individuals with the objective of appropriating, taking advantage of, or taking possession of a material or intangible good that belongs to others, in an undue way and harming another, and generally due to the lack of knowledge or wit of the affected party.

**Bribery:** This is a form of corruption and consists of offering, requesting, receiving, or delivering any object of value with the goal wrongfully complying with an obligation or obtaining an undue advantage.

**Facilitation Payments:** These are payments made to government officials, in order to ensure or expedite a government action or procedure, for the benefit of an employee or Drummond Ltd.

**Transnational Bribery:** Act by virtue of which a legal person through its employees, administrators, associates, contractors or subordinate companies give, offer or promise to a foreign public official, directly or indirectly: (i) sums of money, (ii) objects of pecuniary value or (iii) any benefit or utility in exchange for said public official performing, omitting or delaying any act related to their functions and in relation to an international business or transaction.

## 4. BASIC CRITERIA


- This policy will not be published until it has been approved by the President of DLTD.
- This update to the policy will take effect once it has been approved and published on DLTD's website and in its Integrated Management System, which are the authorized sites that ensure use of the current versions of the company's Corporate Policies.

## 5. POLICY GUIDELINES

Drummond Ltd. reiterates its commitment with its employees, providers, and contractors' compliance of the applicable laws and regulations in the country when carrying out its operations in Colombia in an honest and ethical way.

Drummond Ltd.'s policy has a zero tolerance for bribery and corruption, and it constantly seeks to implement the best practices against criminal activities.

With the objective of complying with its commitment against bribery and corruption, Drummond Ltd:

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- Promotes and establishes an organizational culture based on ethics and legality.
- Prioritizes the activities of prevention against bribery and corruption, without reducing the efforts aimed at detecting and correcting situations related to these crimes.
- Assesses the signs of alleged bribery and corruption acts, under the principles of confidentiality, integrity, transparency, objectivity, Independence, and autonomy of those responsible for the assessments.
- Timely manages all claims of acts related to bribery and corruption, regardless of their amount or of the personnel involved, guaranteeing confidentiality, objectivity, and transparency.
- Does not accept retaliation or negative consequences against any employee, provider, or contractor for preventing, rejecting, or reporting any act of this nature.
- Prohibits facilitating payments, regardless of their amount.
- Does not establish ties with third parties who have been sentenced for criminal activities related to bribery and corruption.
- Has channels through which claims are received related to the non-compliance of that disposed in the Code of Conduct, including the acts related to Bribery and Corruption.

Drummond Ltd will impose disciplinary and/or contractual measures that it considers appropriate to those employees, providers, or contractors that violate what has been established in this Policy. Likewise, the non-compliance of the Policy represents a violation of anti-bribery and anti-corruption laws; in this situation, the Company will refer the issue to the competent authorities, which may represent the imposition of sanctions, fines, prison or any other type of responsibility for those who violate it.

## 6. APPROVAL

### Approved by:

*José Miguel Linares Martínez*

*President Drummond Ltd.*

**Date: 10/19/2020**