 DRUMMOND LTD. <small>COLOMBIA</small>	INTEGRATED MANAGEMENT SYSTEM	SIG-6113
		Version 1
	SEXUAL HARASSMENT PREVENTION AND ATTENTION POLICY	September 2024
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SEXUAL HARASSMENT PREVENTION AND ATTENTION POLICY

CODE: SIG-6113

Drummond Ltd. is aware of its legal and contractual responsibilities, which is why it has always operated within the legal framework and has adopted the highest industry standards in order to provide healthy and safe work environments through robust policies on Human Rights, Safety and Health at Work and Environment, Equity and Inclusion, Human Resources, Prevention and Intervention against workplace harassment, among others.


Nevertheless, in order to continue contributing to mining with a positive impact, Drummond Ltd. declares and assumes the purpose of guaranteeing an environment free of sexual harassment and gender violence with an inclusive approach to all people who participate in the work context of its operations, regardless of the nature of their contract status, commercial or contractual relationship.

All of the above means that Drummond Ltd., in accordance with the principles of equality, respect and non-discrimination, which it declares to be non-negotiable, and in order to maintain environments free of harassment and violence in which the honor, dignity, good name, privacy and freedom of people in the workplace are protected, the company declares not to accept any form of discrimination, harassment, bullying or violence, for which it is committed to develop and manage preventive actions to protect, address and correct behaviors that could constitute sexual harassment.

In order to comply with this Policy, Drummond Ltd. is committed to the following actions:

1. Prevent, investigate, sanction and report conduct proven as sexual harassment in the work context in light of Law 2365 of 2024.
2. Respect for human dignity.
3. Respect for the rights of victims and persons under investigation.
4. Zero tolerance of any form of sexual harassment.
5. Actions of dissemination, general training, diffusion and socialization of this policy.
6. Publication every six months of the number of complaints processed and sanctions imposed through the channels established by law for this purpose.

Therefore, based on this profound commitment, Drummond Ltd. will take the corresponding actions and measures in the event of non-compliance with this Policy.

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1. PROTOCOL AND ATTENTION ROUTE

The person who considers being in a situation that constitutes sexual harassment, or who has knowledge that another person in the work context may be a victim of sexual harassment, in the terms established in Law No. 2365 of 2024, may submit his/her written complaint through the following means, which will guarantee absolute confidentiality:

1. E-mail: atencionacososexual@drummondlt.com
2. Mailing address: Calle 72 # 10 - 07 office 1302, Bogotá D.C., addressed to the Vice-Presidency of Human Resources.

Upon receipt of the complaint, which shall contain a detailed account of the facts and summary evidence thereof, the following protocol shall be followed:

1. It will be transferred to the Vice-Presidency of Human Resources.
2. If the complaint involves employees of contractors, it will be forwarded to them through our Contracts Department.
3. Through the Vice-Presidency of Human Resources and the Vice-Presidency of the corresponding area, immediate protection guarantees will be implemented by developing actions that will allow the cessation of sexual harassment conducts and avoid irreparable damage to individuals.
4. Persons who consider themselves victims of the crime of sexual harassment will be informed that they may report their case directly to the Attorney General's Office.
5. At the request of the victim, the complaint or claim shall be transferred to the competent authorities.
6. In cases where the alleged harasser is the President, the complaint must be filed with the Labor Inspection, which will be responsible for following up on the complaint and, if it finds merit, will send copies to the competent authority.
7. Individual meetings with those involved in the events will be scheduled through the Human Resources Department at each location.
8. Any others established by law, the Colombian constitutional and jurisprudential framework and the guidelines established in the Transversal Plan for the elimination of sexual harassment once it is issued by the national government.

Based on the analysis of the investigation, the Company will evaluate the adoption of administrative, corrective or punitive measures, as provided for in the Internal Labor Regulations, employment contracts, collective bargaining agreements in force and/or arbitration awards.