



|   |                                     |             |
|---|-------------------------------------|-------------|
|  | <b>INTEGRATED MANAGEMENT SYSTEM</b> | SIG-4963    |
|   |                                     | Version 2   |
|   | COMMUNICATIONS POLICY               | 11/25/2020  |
|   |                                     | Page 1 of 5 |

**COMMUNICATIONS POLICY**

**CODE: SIG-4963**


|                               |   |
|-------------------------------|---|
| <b>Elaborated (Position):</b> | Communications Department   |
| <b>Reviewed (Position):</b>   | Pablo Urrutia<br>Public Affairs & Communications Vice-President Drummond Ltd. |
| <b>Approved (Position):</b>   | Richard Mullen<br>CEO Drummond Co.  |

| CHANGE CONTROL |            |  |
|----------------|------------|--|
| Version        | Date       | Summarized description of change         |
| 1              | 02/19/2014 | Initial version                          |
| 2              | 11/25/2020 | General update for the management system |

|   |                                     |             |
|---|-------------------------------------|-------------|
|  <b>DRUMMOND LTD.</b><br><small>COLOMBIA</small> | <b>INTEGRATED MANAGEMENT SYSTEM</b> | SIG-4963    |
|   |                                     | Version 2   |
|   | COMMUNICATIONS POLICY               | 11/25/2020  |
|   |                                     | Page 2 of 5 |

## TABLE OF CONTENTS

|                                     |                                     |
|-------------------------------------|-------------------------------------|
| <b>1. OBJECTIVES .....</b>          | <b>3</b>                            |
| <b>2. SCOPE.....</b>                | <b>3</b>                            |
| <b>3. DEFINITIONS .....</b>         | <b>3</b>                            |
| <b>4. PRINCIPLES.....</b>           | <b>3</b>                            |
| <b>5. POLICY GUIDELINES .....</b>   | <b>4</b>                            |
| <b>6. RESPONSIBLE .....</b>         | <b>5</b>                            |
| <b>7. REFERENCE DOCUMENTS .....</b> | <b>Error! Bookmark not defined.</b> |

|   |                                     |             |
|---|-------------------------------------|-------------|
|  | <b>INTEGRATED MANAGEMENT SYSTEM</b> | SIG-4963    |
|   |                                     | Version 2   |
|   | <b>COMMUNICATIONS POLICY</b>        | 11/25/2020  |
|   |                                     | Page 3 of 5 |

## 1. OBJECTIVES

- Provide guidelines that guarantee the adequate dissemination of information to groups of interest.
- Protect the company's reputation and mitigate sensitive scenarios in terms of communication.
- Make the communication role visible in the development of the business and on the impact of crisis situations.

## 2. SCOPE

This policy is applicable to all employees, suppliers, contractors, and interested parties of Drummond Ltd.

## 3. DEFINITIONS

**Communication:** The set of elaboration and message dissemination actions destined for the company's internal and external audiences, with the purpose of building a corporate image and identity that is in agreement with the organization's values.


**Social networks:** These are structured by persons or organizations who connect to the internet, based on common interests and values. Through them, relationships are quickly created between individuals or companies, without any hierarchy or physical limits. The social networks that are mostly used in Colombia, according to a study from the Ministry of Information Technology and Telecommunications are: Whatsapp, Facebook, Youtube, Instagram, and LinkedIn.

**Reputation:** Refers to the opinion or perception we have of someone or something, and designates the standing of an individual or organization, as a consequence of the activity that is developed and the way in which it is carried out.

## 4. PRINCIPLES

**Transparency:** All of Drummond's communications rely on facts and do not omit relevant information for all groups of interest.

**Responsibility:** Any of the company's official communications are based on the principle of responsibility in terms of the information that is disseminated, the Colombian regulations, and that of the audiences.

|   |                                     |             |
|---|-------------------------------------|-------------|
|  | <b>INTEGRATED MANAGEMENT SYSTEM</b> | SIG-4963    |
|   |                                     | Version 2   |
|   | COMMUNICATIONS POLICY               | 11/25/2020  |
|   |                                     | Page 4 of 5 |

**Opportunity:** The Company must ensure that all the information issued to its stakeholder groups is both accurate in content and timely.

**Coherence:** All Drummond communications must be coherent between what is informed and what the company does.

**Accuracy:** Any communication issued by Drummond must be verified with the purpose of delivering information without any type of imprecision or ambiguities.

## 5. POLICY GUIDELINES

### External Communications

All employees must try to interact with Drummond Ltd.'s stakeholders in a responsible manner, and consequently, they must ensure the adequate use of all institutional information, stimulating an open dialogue with all audiences.

In this sense, no employee must assume the role of spokesperson for the company with any communications media or at public events without prior authorization, nor assume any political or ideological stance on behalf of the company.


Drummond Ltd. has a Corporate Identity Manual, which includes designs and templates, and which must be consulted with the goal of guaranteeing the adequate use of the company's corporate image, following the instructions enshrined therein and complying with them.

All company employees must report any sensitive situation for the groups of interest or the company's reputation. Likewise, they must use the communications channels established to report any ethical violations or to the Code of Conduct.

### Internal Communications

Drummond Ltd. believes its communications media are basic tools to develop a close relationship with employees, and which help in achieving the company's objectives.

Consequently, any communication issued must be transparent, direct, timely, and precise. To compliment these parameters, Drummond Ltd., stimulates two-way communications processes, involving employees from all levels in an individual way and in the employee associations that exist within the company. This promotes a climate that allows obtaining a direct feedback that results in a better working environment and in the optimization of human resource processes.

|   |                                     |             |
|---|-------------------------------------|-------------|
|  | <b>INTEGRATED MANAGEMENT SYSTEM</b> | SIG-4963    |
|   |                                     | Version 2   |
|   | COMMUNICATIONS POLICY               | 11/25/2020  |
|   |                                     | Page 5 of 5 |

Drummond Ltd. has a Corporate Identity Manual, which includes designs and templates, and which must be consulted in advance in order to guarantee the proper use of the company's corporate image in all graphic pieces or POP material, following the instructions enshrined therein and complying with them.

### **Social Networks**

The use of social networks by employees must try to be responsible, as every single worker can affect the company's brand with their daily lives, including their interaction with third parties via the Internet. Making claims on behalf of the company on personal social network accounts is not permitted, as well as revealing confidential company information or that belonging to clients, providers, competitors, or peers.

On the other hand, the company has created adequate channels for people to be able to make comments or claims about the company. For concerns, complaints, or claims, people may write to: [atencionalusuario@drummondLtd.co](mailto:atencionalusuario@drummondLtd.co), or to [denuncias@drummondLtd.com](mailto:denuncias@drummondLtd.com).

Even if a profile states that the comments do not involve the company, in social networks it is very difficult to separate the personal environment from the work environment. For this reason, all employees are responsible for the information they decide to disseminate and share through their social networks and instant messaging platforms (chats), even legally.

### **6. RESPONSIBLE**

Public Affairs & Communications Vice-Presidency

### **7. REFERENCE DOCUMENTS**

Employee manual

Corporate Identity Manual [https://www.drummondLtd.com/wp-content/uploads/14032022\\_Manual-de-Identidad-Corporativa\\_2022-VF.pdf](https://www.drummondLtd.com/wp-content/uploads/14032022_Manual-de-Identidad-Corporativa_2022-VF.pdf)