

GRIEVANCES AND COMPLAINTS MECHANISM

Drummond Ltd. will make available a Grievances and Complaints Mechanism so that any suspicion or knowledge of any irregularity in matters of policy compliance, regulations, contracts, among others, is presented in a safe manner for the complainant and is promptly resolved. Those situations or claims that involve a personal interest will not be processed through this mechanism. The anonymity of whoever presents the claim of any irregularity or complaint is fully guaranteed; however, if a person, within his/her own will, prefers to be identified, Drummond Ltd. will maintain absolute confidentiality of the actions that may be taken as a result of these claims.

This mechanism does not exclude, but complements, those mechanisms established in the Colombian regulations and that are developed in administrative and legal matters.

This mechanism may be used by any person, as it mainly seeks to focus on dialogue and agreement as the main path to solve the irregularities or controversies presented.

Drummond Ltd. is committed not to use retaliation, as we believe that the protection of the individuals who have presented claims in good faith, is a way to reinforce the culture of honesty and integrity within the organization, through prevention, detection, and reporting of improper acts.

On the other hand, if the party interested in presenting a claim prefers it, he/she will have the option to be treated as anonymous, case in which the necessary measures will be taken to preserve the confidentiality and safety of whoever presents the claim.

The person interested in presenting a claim may do so through the mechanisms made available by Drummond Ltd. for said purpose in name of the Ethics Committee, which will be made up by representatives of the Legal, Human Resources, Materials, and Internal Audit Departments.

Means made available by Drummond Ltd. to present grievances and complaints:

- denuncias@drummondltd.com
- Written report to: Calle 72 No. 10-07 Office 1302 Bogota D.C.
- Ethics hotline: 018000919161



- Direct number 57 (5) 5719499
- Internal extension: 8499
- Complaint format

If the person prefers to identify him/herself by using these means, he/she may be called upon to present his/her claim, and will receive a formal response regarding the investigations performed on the allegations.

Regardless of the claimant's identification or lack thereof, the information must be put into context and supported with evidence, as long as it is possible.

The final report of the investigation elaborated by the Ethics Committee will be presented to the immediate supervisor of the person(s) involved, with the recommended actions that should be taken in regards to the employees who do not comply with that established by the Code of Conduct and/or the policies of the Corporate Ethics Program.

If from the investigations performed it is concluded that a violation of the policies, regulations, contracts, collective agreements, among other, has occurred, disciplinary processes may be initiated without prejudice of a future termination of the contractual relationship, as well as if findings have an incidence of another order, claims may be presented before the competent authorities.

The Company will implement all the means possible so that all stakeholders are aware of the existence of the *Grievances and Complainants mechanism*.

Authorized: *Richard Muller*
Date: *11/5/12*
Updated: