 DRUMMOND LTD. <small>COLOMBIA</small>	INTEGRATED MANAGEMENT SYSTEM	SIG-4631
		Version 1
	COMMUNITY RELATIONS POLICY	01/02/2021
		Page 1 of 5

COMMUNITY RELATIONS POLICY

CODE: SIG-4631

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TRACKED CHANGES		
Version	Date	Summary description of changes
1	2011	Initial version.
2	January 2021	<ul style="list-style-type: none"> Update to the Community Relations Policy, aligned with the Corporate Social Responsibility Policy and Strategy. Inclusion in the Social Management System (objective, scope, definition, managers and reference documents.)


 DRUMMOND LTD. <small>COLOMBIA</small>	INTEGRATED MANAGEMENT SYSTEM	SIG-4631
		Version 1
	COMMUNITY RELATIONS POLICY	01/02/2021
		Page 2 of 5

TABLE OF CONTENTS

1. **OBJECTIVE** 3


2. **SCOPE** 3

3. **DEFINITIONS** 3

4. **POLICY GUIDELINES** 4

5. **MANAGERS** 5

6. **REFERENCE DOCUMENTS** 5

 DRUMMOND LTD. <small>COLOMBIA</small>	INTEGRATED MANAGEMENT SYSTEM	SIG-4631
		Version 1
	COMMUNITY RELATIONS POLICY	01/02/2021
		Page 3 of 5

1. OBJECTIVE

To establish the guidelines for how Drummond Ltd. conducts its relations with the communities in its area of influence, the importance of these relationships for the Community, how strategies are designed to ensure compliance with the law, respect for human rights and maintenance and strengthening of its social license to operate.

Specific community relations objectives:

1. Ensure and generate conditions for coexistence and dialogue between the Company and the community.
2. Promote and encourage projects that improve local capabilities in the area of influence.
3. Maintain constant contact and dialogue with the various stakeholders in the community.

2. SCOPE

Applicable to the communities in the area of direct influence of the mining and port operations.

3. DEFINITIONS

AREA OF INFLUENCE: An area or regional entities in which the most significant environmental, social and economic impacts caused by the execution of the mining and port operations are directly manifested.

CAS: Community Attention System.


CITIZEN: Any member of the community or a public and/or private organization. An individual right holder.

COMMUNITY(IES): Group of people settled in the areas of direct influence of the Company's mining and port operations in the departments of Cesar and Magdalena.

PQRSF (Spanish acronym): Request, Complaint, Claim, Suggestion and Congratulations.

STAKEHOLDER: Individual or group that has an interest in any decision or activity of an organization.¹

¹ Guidance on Social Responsibility, ISO 26000:2010 (official translation).

	INTEGRATED MANAGEMENT SYSTEM	SIG-4631
		Version 1
	COMMUNITY RELATIONS POLICY	01/02/2021
		Page 4 of 5

4. POLICY GUIDELINES

COMMUNITY RELATIONS POLICY


It is Drummond Ltd.'s policy to conduct our relationships with the various stakeholders in the community under statements of respect and constant communication, contributing to building trust and co-responsibility in our relations, and in the projects and programs that are carried out as part of the Company's social management. Through these relationships, we seek to generate spaces for development, building social fabric, communication, information and responses to requests, complaints, claims, suggestions and congratulations (PQRSF) and any complaints that may arise regarding the execution of the mining and port projects, which are managed through the Community Attention System (CAS).

For Drummond Ltd., interaction with community stakeholders takes place within due diligence and respect for human rights. We do not tolerate any kind of violation of these rights and prohibit any discrimination that may arise within the framework of our relationships with respect to ideologies, race, sex, social class, religion, beliefs, or others. We promote good neighbor practices, social and gender equality and respect for diversity.

The Company maintains, develops and implements mechanisms that facilitate and promote the continuous improvement of relations with the stakeholders from the communities in the area of influence of our mining and port operations.

To develop this Policy, Drummond Ltd.:

1. Reiterates its commitment to the communities in the area of influence of its operations in Colombia to have a positive impact, highlighting as a general principle that, through the development of its relationships, it does not replace the State in its functions and obligations.
2. Recognizes that relations with the communities located in the area of influence of its operations are fundamental in the development of its activities.
3. Designs and implements strategies to facilitate and improve community-business relations.
4. Responds to requests, complaints, claims, suggestions and congratulations (PQRSF) and complaints submitted by the community or its stakeholders using criteria of kindness, promptness and efficiency, managed through the Community Attention System (CAS).
5. Keeps all information of interest regarding the development of its mining and port projects available to the community.
6. Facilitates through good relations and constant dialogue, compliance with the applicable legislation on matters that are sensitive to the community, such as taxes and royalties, safety and the environment, as well as the obligations established by the competent authorities.

 DRUMMOND LTD. <small>COLOMBIA</small>	INTEGRATED MANAGEMENT SYSTEM	SIG-4631
		Version 1
	COMMUNITY RELATIONS POLICY	01/02/2021
		Page 5 of 5

7. Develops its social and investment management plan based on socioeconomic studies of the areas of influence of its operations, the needs of the communities and the national, departmental and municipal development plans, contributing to quality of life and social welfare.
8. Works hand-in-hand with the communities, local authorities and different actors and institutions in the region, as co-managers and co-financiers of programs and projects that improve citizens' quality of life.
9. Periodically evaluates the programs that have been established to facilitate its relationships with the community to measure their effectiveness and thereby define options to improve compliance with this Policy.

5. MANAGERS

- **Community Relations Department:** Establish the guidelines for relations with the communities in the area of direct influence of the Company's mining and port operations. Define the adjustments that need to be made to this Policy as part of the continuous improvement process and monitor compliance with it.
- **Communities:** Understand the Policy, participate in its implementation and, through dialogue and feedback, be part of the continuous improvement processes.

6. REFERENCE DOCUMENTS

- Sustainability Policy and Corporate Social Responsibility Strategy.
- Community Attention Policy Manual
- Guidance on Social Responsibility, ISO 26000:2010 (official translation)
- Human Rights Policy