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STAKEHOLDER ATTENTION SYSTEM MANUAL

CODE: SIG-4658


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Approval and signature (name and position)	José Miguel Linares: President

CHANGE CONTROL		
Version	Date	Short description of the change
1	2011	Initial version
2	April 2021	Guidelines for the Stakeholder Attention System (SAS)

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I. OBJECTIVE

To establish guidelines for Drummond Ltd. to attend to petitions, complaints, claims, suggestions, congratulations, and reports from its stakeholders in connection with its mining and port projects in the Departments of Cesar and Magdalena, using the different channels for attention provided by its System for Attention to the Public.

II. SCOPE


Applicable to all of the company's stakeholders.

III. PRESENTATION

Within the framework of its Community Relations Policy and with the aim of providing better attention to petitions, complaints, claims, suggestions, congratulations, and reports occurring in connection with the development of the mining and port projects in the Departments of Cesar and Magdalena, Drummond Ltd. provides a series of channels and tools to facilitate and improve communication between the company and its stakeholders.

This **Stakeholder Attention System Manual** constitutes one of these tools. Its publication will help regulate and publicize the process at our company for attending to petitions, complaints, claims, suggestions, congratulations, and reports from our stakeholders. The manual describes the different methods to receive attention either personally at our offices for public attention, via Internet through emails, on our website's page for Attention to the Public, or using the phone lines established. Another option for receiving attention is the Reporting Channel created exclusively for situations of possible bribery or corruption, violations of ethics or of corporate compliance, or any doubts with respect to the application of the Business Ethics Program.


Our human rights due diligence implements the United Nations Guiding Principles on Business and Human Rights, with a highlight on our work to maintain our stakeholders' confidence in our "grievance mechanisms." Communication about these mechanisms is very important to the company with our communities, contractors, employees, and stakeholders in general, because this type of communication gives us user feedback, which helps us improve our processes. Ensuring use of these means is also of vital importance to us. We want to stay in constant conversation, acting with transparency and in accordance with our principles of effectively managing and resolving grievances. These principles are aligned with the eight criteria for effectiveness of the ICM (International Council on)

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Mining and Metals) in its guidance 'Human Rights in the Mining & Metals Sector: Handling and Resolving Local Level Concerns and Grievances.'¹

Drummond Ltd. is therefore confident it will continue to strengthen its ties with the community and other stakeholders with the purpose of encouraging participation and constant communication, in line with the principles of corporate social responsibility.

¹ Guidance: 'Human Rights in the Mining & Metals Sector: Handling and Resolving Local Level Concerns and Grievances.' <https://www.icmm.com/website/publications/pdfs/social-performance/2019/es/es-grievance-mechanism.pdf>

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IV. 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 Stakeholder Attention System (SAS).

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 Stakeholder Attention System (SAS).
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

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and royalties, safety and the environment, as well as the obligations established by the competent authorities.

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.

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V. DESCRIPTION OF THE MANUAL'S CONCEPTS

COMMUNITY: A group of people settled in the area of direct influence of the company's mining and port operations, in the Departments of Cesar and Magdalena.

PUBLIC: All members of the community or of public and/or private organizations that present a petition, complaint, claim, suggestion, or congratulations, or a report to the company. A person holding rights.

DIRECT AREA OF INFLUENCE: A region or regional entity directly impacted by the most significant environmental, social, and economic impacts of the mining and port operations.

STAKEHOLDER: An individual or group with an interest in any decision or activity of the organization.

PETITION: The right of all members of the public to submit a respectful request for information and/or a query to the competent entities or authorities, for reasons of general or particular interest.


COMPLAINT: An expression of disagreement or dissatisfaction made by a person or group with respect to a conduct or situation they believe to be inappropriate on the part of the operation, employees, contractors, or any other party involved with the company. A complaint does not include a request for redress.

CLAIM: A request in which the member of the public expects redress.

SUGGESTION: The expression of an idea or a proposal to improve the company's service or management.

CONGRATULATIONS: An expression made to the company and/or recognition in response to an achievement. An expression of gratitude for a benefit received.

REPORT: A special means established for all Drummond Ltd. stakeholders to communicate any doubt or need for advice about application of and compliance with the Business Ethics Program, or to report any type of conduct related to corruption or counter to compliance with the company's corporate policies.

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ABBREVIATIONS:


SIG: Spanish for Integrated Management System

SAS: Stakeholder Attention System

PQRSFD: The Spanish acronym for Petitions, Complaints, Claims, Suggestions, Congratulations, and Reports

ICMM: International Council on Mining and Metals

UNGP: United Nations Guiding Principles

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VI. STAKEHOLDER ATTENTION SYSTEM (SAS)

Attention to petitions, complaints, claims, suggestions, congratulations and reports.




Drummond Ltd. believes it is important to listen and attend to its stakeholders in pursuit of continuous improvement and greater efficiency in its activities.

We are committed to attending to petitions, complaints, claims, suggestions, congratulations, and reports, guaranteeing access mechanisms and attention to any possible impacts and/or violations of rights, creating accessible, timely, and efficient arenas for communication.

To implement these mechanisms and ensure engagement with our stakeholders using all of the channels for attending to the public, we base our work on 11 principles. These principles are aligned with the 8 effectiveness criteria of the ICMM (International Council on Mining and Metals) in its guidance 'Human Rights in the Mining & Metals Sector: Handling and Resolving Local Level Concerns and Grievances,' and with the United Nations Guiding Principles on Business and Human Rights, which is the international standard for business and human rights².

² Guidance: 'Human Rights in the Mining & Metals Sector: Handling and Resolving Local Level Concerns and Grievances.' <https://www.icmm.com/website/publications/pdfs/social-performance/2019/es/es-grievance-mechanism.pdf>

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Our 11 principles for effectively managing and resolving requests from our stakeholders, are:

Legitimacy: Drummond Ltd. will strive to ensure that its System for Attention to the Public is known by its stakeholders and inspires the trust of the public.

Accessibility: The System will be within reach of all of the company's stakeholders. This implies that Drummond Ltd. will keep all the channels open that have been established for attending to the petitions, complaints, claims, suggestions, congratulations, and reports described in this Manual, guaranteeing easy access to anyone who wishes to file a PQRSFD.

Predictability: The System will reflect the characteristics described in this document. The actions of Drummond Ltd. and its officials must ensure compliance with the characteristics defined for the System.


Confidentiality and anonymity: Drummond Ltd. will respect the confidentiality and anonymity of the members of the public who submit petitions, complaints, claims, suggestions, congratulations, or reports, when so requested.

Transparency: The System for Attention to the Public will operate in a way that is open and verifiable for those who have a legitimate interest in using it. In this sense, Drummond Ltd. will clearly communicate to stakeholders how the system works, including the results it produces, taking care to not violate confidentiality or anonymity when requested.

Constructive dialogue: The System will prioritize dialogue with the public as the preferred mechanism for analyzing and resolving, especially, complaints and claims, promoting constructive communication between the parties.

Cultural relevance: The channels for receiving petitions, complaints, claims, suggestions, congratulations, and reports are culturally appropriate for addressing the concerns of the different stakeholders. They take into account cultural particularities and differences.


Equity: The System will seek to reduce gaps in power, knowledge, and influence between the company and its stakeholders, including seeking collaboration from internal experts, external government experts with expertise in the subject, when available, or private experts, to better understand the cases filed in the System and build solutions jointly with the member of the public.

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Respect: Drummond Ltd. will treat members of the public who file cases in the System with respect.

Corporate backing: The System is aligned with the strategic objectives of the business. We therefore count on monitoring by senior management and a system of indicators that are fully known within the company.

Source of continuous learning: The effectiveness of the System for Attention to the Public will be regularly measured and reviewed in order to document lessons that can be learned, in such a way as to identify opportunities for improvement in the company's work.

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VII. STAKEHOLDER ATTENTION CHANNELS


1. STAKEHOLDER ATTENTION ONLINE PORTAL

Drummond Ltd. has an Online Portal to manage petitions, complaints, claims, suggestions, congratulations, and reports. Its objectives are the following:

1. To record PQRSFD related to specific topics that can increase the efficiency of the work.
2. To implement a tool to evaluate PQRSFD in connection with human rights, in alignment with international standards.
3. To centralize the information about PQRSFD received through the different channels of the System, ensuring a high level of security and confidentiality in their treatment.
4. To use the Online Portal to manage PQRSFD in a comprehensive and transparent manner, receiving feedback, and measuring the effectiveness of the response.
5. To automatically generate reports by subject, location, stakeholder, response, and type of PQRSFD for audits, monitoring, and measuring outcomes.

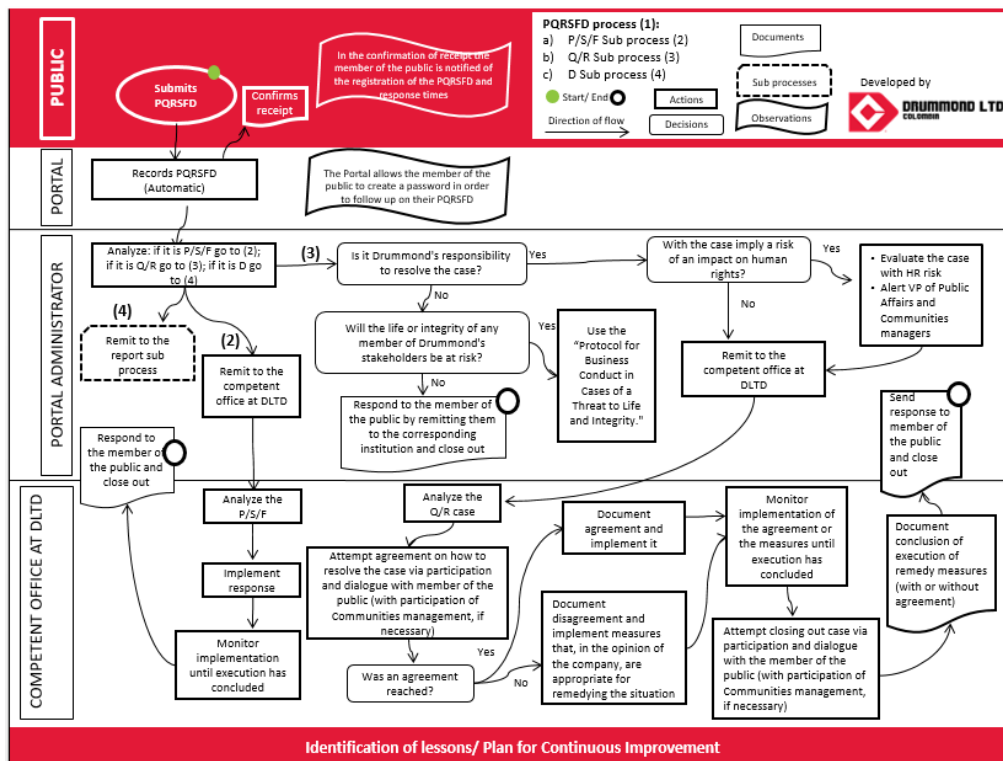
The Borealis software-integrated Online Portal for managing PQRSFD systematizes Drummond Ltd.'s SAS's in accordance with its guidelines in the area of human rights and in line with international standards. It manages case flow based on processes and sub processes so that the company can carry out the corresponding internal procedures and address stakeholder concerns:

- PQRSFD process (1):
 - a. Sub process for petitions, suggestions, and congratulations (P/S/F sub process) (2)
 - b. Sub process for complaints and claims (Q/R sub process) (3)
 - c. Sub process for reports (4)

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1.1. Flow chart for the PQRSFD process (1) and sub processes (2, 3, 4)

- PQRSFD process (1):
 - a. Sub process for petitions, suggestions, and congratulations (P/S/F sub process) (2)
 - b. Sub process for complaints and claims (Q/R sub process) (3)

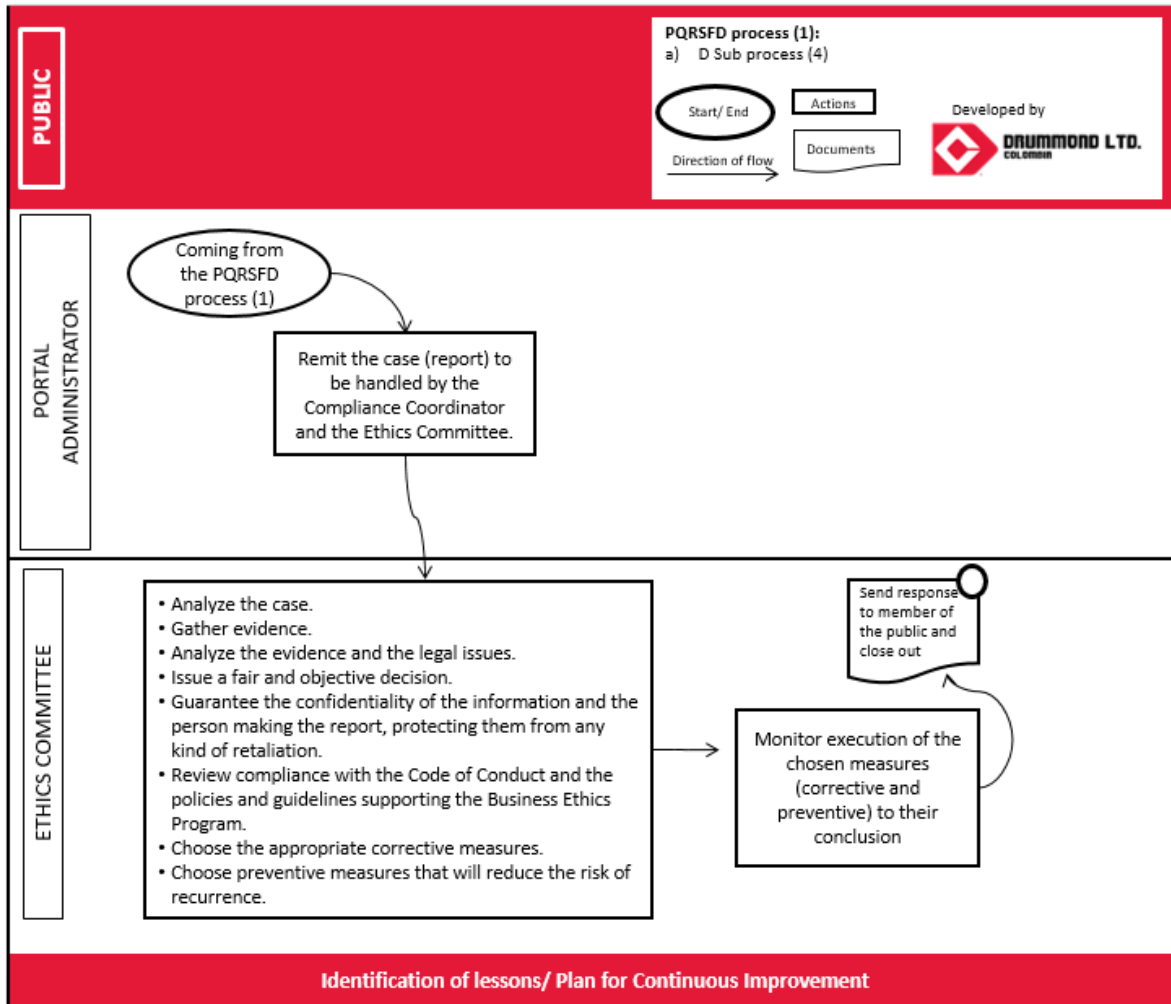



To keep in mind:

- When the life or integrity of a member of one of Drummond's stakeholders is at risk, the "protocol for corporate action in the case of threats to life and integrity," formulated by the Working Group on Human Rights and Coal - made up of the Presidential Council for Human Rights and International Affairs, the Ministry of Mines and Energy, the National Mining Agency, the Colombian Mining Association, and the companies Cerrejón, Drummond Ltd. Colombia, the Prodeco Group and C.N.R. - must be activated so this sector can contribute to best practices in human rights.

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c. Sub process for reports (4)

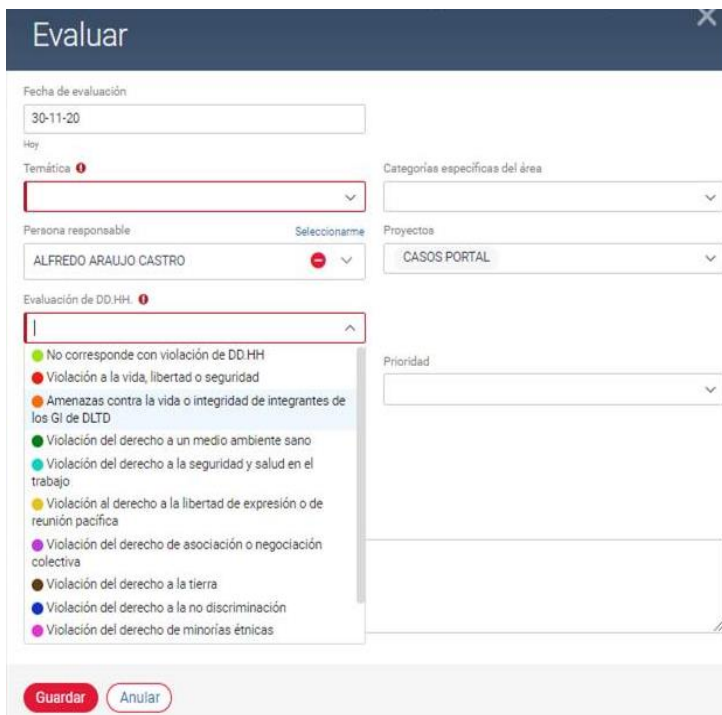


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1.2. Human rights and risk assessment process


International human rights standards recommend that companies should have effective mechanisms for attending to concerns. This means mechanisms must be legitimate, accessible, predictable, equitable, transparent, human rights-compatible, a source of continuous learning, and based on participation and dialogue. These characteristics coincide with the UN Guiding Principles on Business and Human Rights, the ICM, the OECD Guidelines for Multinational Enterprises, and the ISO 26000 standard.

To these characteristics, Drummond Ltd. expressly adds an element that is implicit in the cited standards: respect for the confidentiality or even anonymity of members of the public who submit concerns to the SAP, when so requested.




The Online Portal also makes a human rights evaluation possible by the platform administrator for all the PQRSFD submitted. When a concern is filed, the administrator must determine whether the member of the public is referring to circumstances that:

- **Do not have to do with a human rights violation:** The PQRSFD is not connected with alleged human rights violations.
- **Would constitute an attack against the life or integrity of a member of DLTD's stakeholders.** This category includes cases that imply attacks or threats against the life of members of its stakeholder groups (such as employees, contractors, social leaders, or human rights defenders), their freedom, or physical safety.
- **Would violate the right to a healthy environment:** Cases that would imply a risk of an impact on the environment.


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- **Would violate the right to occupational health and safety:** cases that would imply a risk to the occupational health and safety of employees, contractors, or visitors to its facilities.
- **Would violate the right to association or collective bargaining:** Cases that would imply a risk to the right to union association or collective bargaining.
- **Would violate the right to freedom of expression or peaceful assembly:** cases that would imply a risk of violating the right to expression and to disseminate thoughts and opinions, inform and receive truthful and impartial information, or the risk of violating the right to assemble and demonstrate publicly and peacefully.
- **Would violate the right to hold land:** cases that would imply a risk to members of the public relative to their condition as legitimate property owners, holders, or occupants.
- **Would violate the right to non-discrimination:** cases that would imply a risk that a member of the public would be subjected to discrimination for any reason (such as sex, race, gender, national or family origin, language, religion, or political or philosophical opinion).
- **Would violate the rights of ethnic minorities:** case that would imply a risk of violating the right to prior consultation, or any other special rights enjoyed by indigenous peoples, Afro descendants, or gypsies.
- **Would imply a risk of child labor:** cases that would imply a risk of minors working for Drummond directly or for one of its contractors at Drummond's facilities without the proper permits.
- **Would imply a risk of forced labor or exploitation:** cases that would imply a risk of a member of the public working for Drummond or for one of its contractors under some kind of threat, or without them having willingly volunteered to work.

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To keep in mind:

- If the concern does not have to do with a human rights violation, it will continue forward on the PQRSFD flowchart to the petitions, suggestions, and congratulations sub process (P/S/F sub process (2)), the complaints and claims sub process (Q/R sub process (3)), or the report sub process (4).
- If the request violates a right, the platform administrator must direct the request to the corresponding office, depending on the particular case. The case will be given high priority by the area responsible for providing a solution and a timely response. In addition, the VP of Public Affairs and Communications, who leads the company's human rights processes, and the managers of Communities should be notified, as the leaders of the process for attending to PQRSFD at Drummond Ltd.

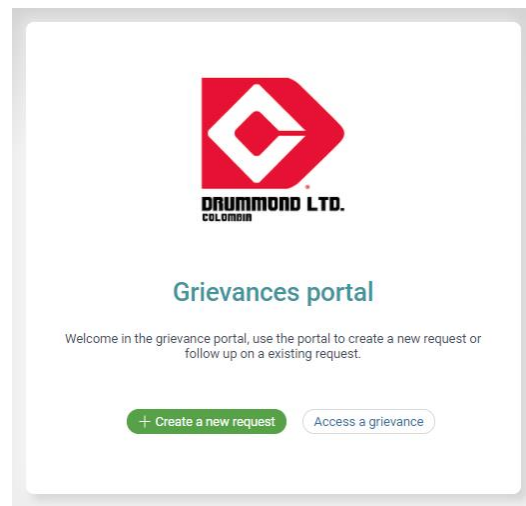
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1.3. Instructions for using the tool

1. The member of the public must click on the following link to access the Online Portal <https://drummond.boreal-is.com/portal/drummond>. They may also enter from Drummond Ltd.'s webpage in the 'Contact Us' section <https://www.drummondLtd.com/contactenos/>
2. Once they enter they may:
 - File a PQRSFD
 - File a PQRSFD anonymously
 - Follow-up on a PQRSFD
3. The portal will guide them through the steps necessary to file petitions, complaints, claims, suggestions, congratulations, or reports.

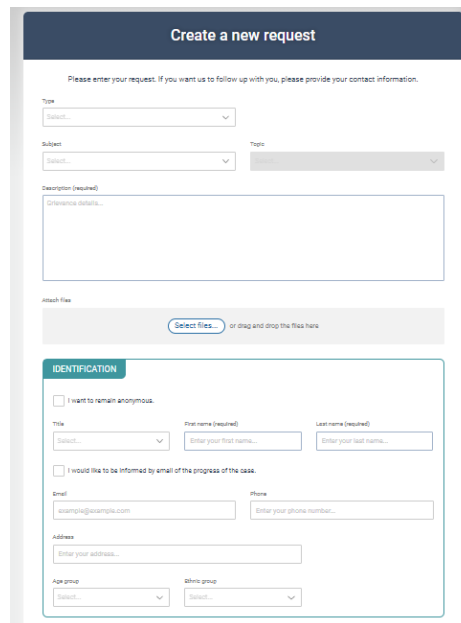
FILING A PQRSFD

1. The member of the public must use the link <https://drummond.boreal-is.com/portal/Drummond>, option "Create new request"

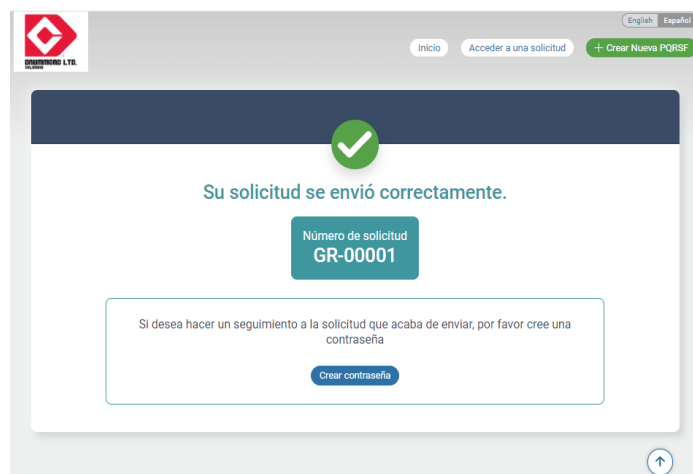



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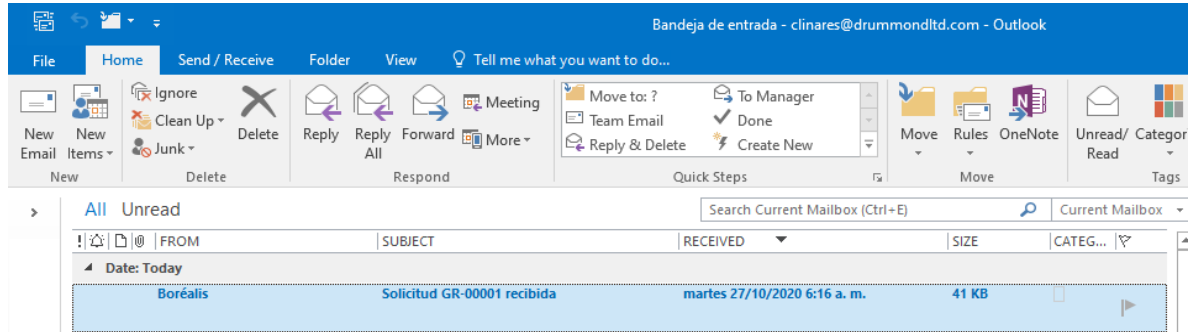
2. They must fill out the form with the information required to submit the PQRSFD.




3. Once the PQRSFD has been submitted, the system will immediately display the case number, and at the same time the member of the public will receive an email at their registered address confirming the case number and providing information on response times.



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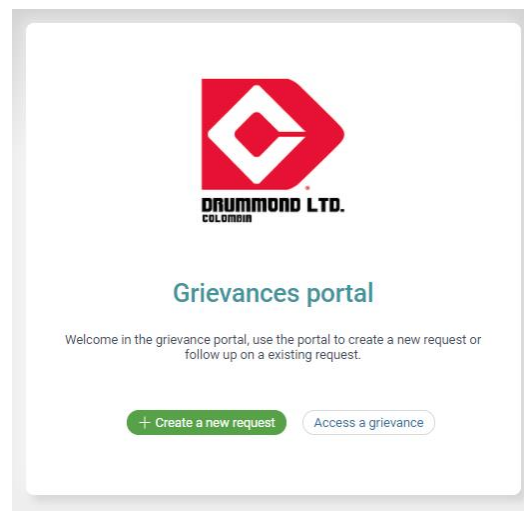
4. If the member of the public does not receive either of the two confirmations, the PQRSFD must be submitted once again. If the problem persists, they must use the phone numbers or emails for attention to the public to get in touch:
- atencionalusuario@drummondlt.com - (+571) 571-9300 Ext. 8830- 8832
 - atencionalusuariop@drummondlt.com - (+571) 571-9300 Ext. 8072

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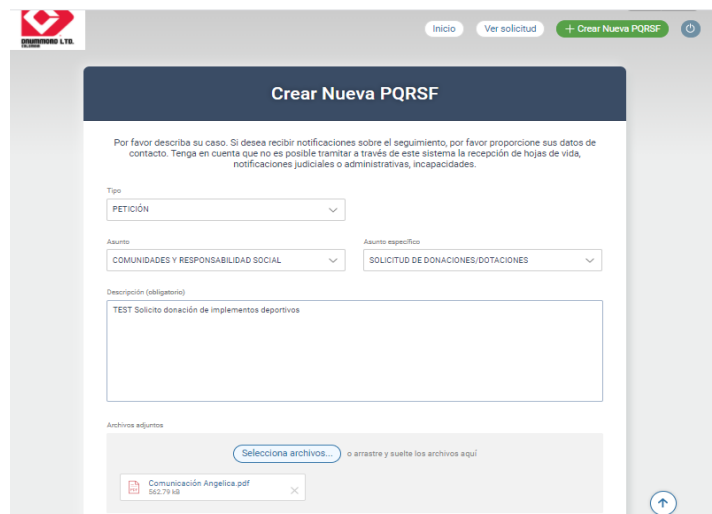
FILING AN ANONYMOUS PQRSFD


Anonymous PQRSFD are those in which the member of the public does not wish to leave a record of their identity.

1. The member of the public must use the link <https://drummond.borealis.com/portal/Drummond>, option “Create new request”



2. They must fill out the **first module** of the form with the information required to submit their PQRSFD.



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3. In the **second module** of the form, the member of the public should select the option that says: I want to remain anonymous.

IDENTIFICATION

I want to remain anonymous.


Title First name (required) Last name (required)

4. If the member of the public wishes to be informed via email of the progress of the case, they must select the option: I would like to be informed by email of the progress of the case.

IDENTIFICATION

I want to remain anonymous.

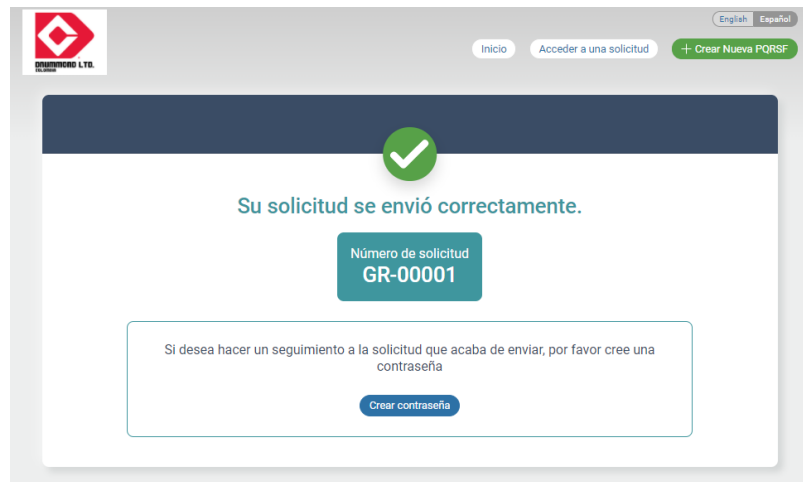
I would like to be informed by email of the progress of the case.

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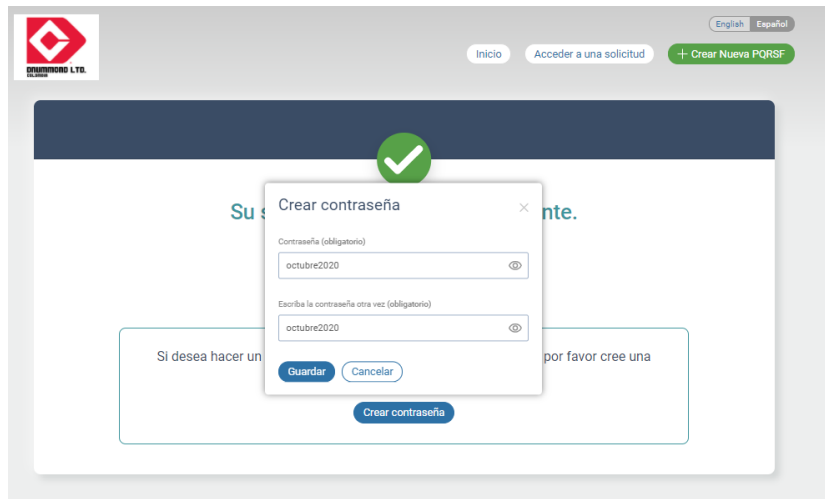
FOLLOW-UP ON A PQRSFD


If at the end of the submission process, the member of the public wishes to be able to later follow up on their PQRSFD, they must create a password:

1. In the lower portion of the submission confirmation, select the option “Create password”.

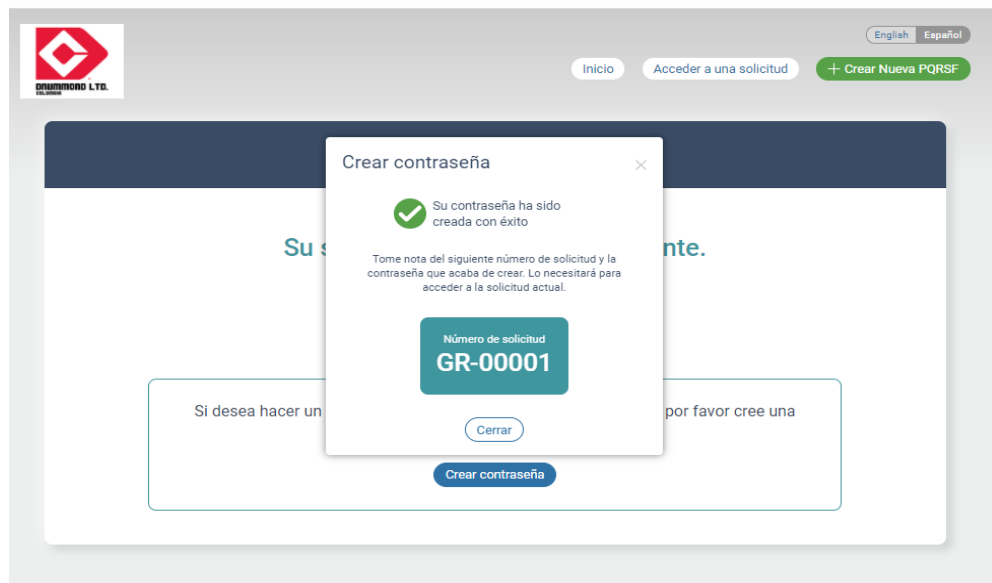


2. A pop-up window will appear where the person can create a password.

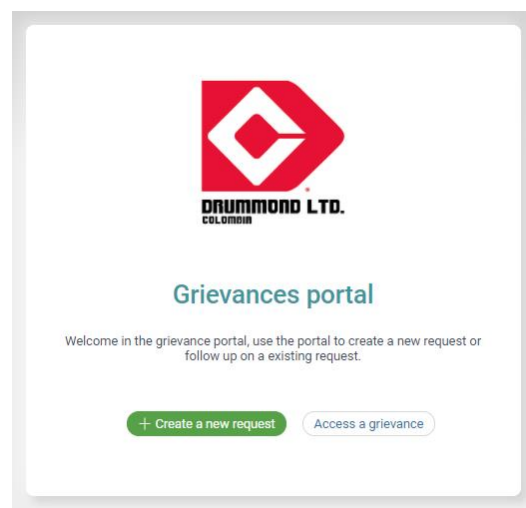



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- When the password is created, the system will display the case number to use to track the PQRSFD.

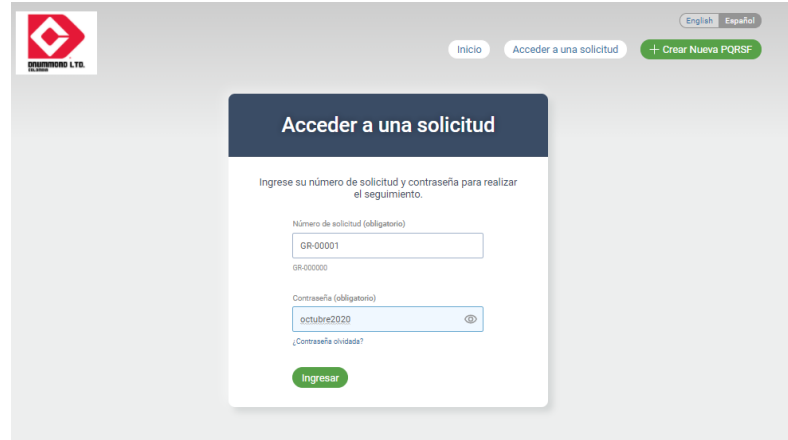


- Once they have the case number and password, the member of the public should click on close, and then click on the option “Access a grievance” on the start page.

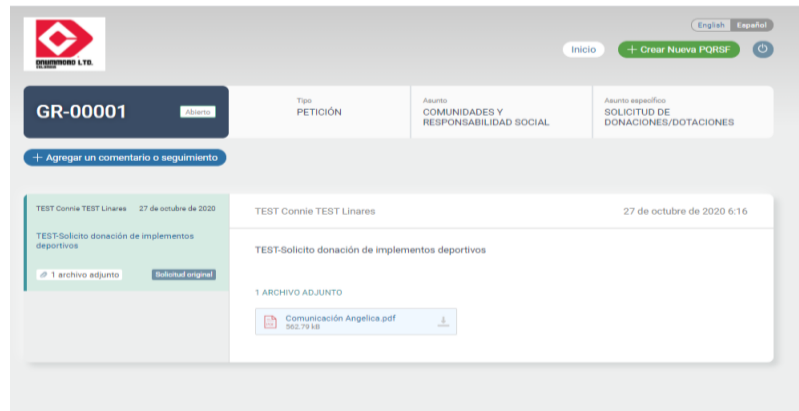



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5. They must type in the case number and their password.



6. Now they can follow up on the PQRSFD. This module has an option to add additional information to a case already submitted.



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2. REPORTING CHANNEL

Drummond Ltd. has a Reporting Channel for presenting any suspicion or knowledge of an irregularity in compliance with policies, regulations, or contracts in a way that is safe for the reporter and can be quickly resolved. In addition, it can also be used to clear up doubts or express needs related to compliance with the company's Business Ethics Program.


Those situations or reports that have to do with a personal situation will not be dealt with using this mechanism. The anonymity of the person reporting an irregularity or making a complaint is fully guaranteed. However, if a person wishes, of their own free will, to identify themselves, Drummond Ltd. will maintain complete confidentiality regarding the actions taken in consequence of the report.

This reporting channel does not exclude, but rather complements, those mechanisms established in Colombian laws and developed in administrative and judicial arenas. It may be used by any member of the public, and focuses mainly on dialogue and consensus as the main way for resolving any irregularities or disputes.

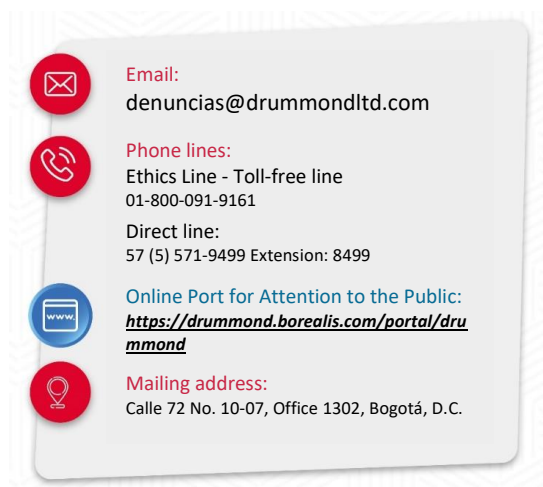
Drummond Ltd. is committed to non-retaliation, believing that protecting people who have submitted reports in good faith is a way to reinforce the organization's culture of honesty and integrity through prevention, detection, and reporting of improper actions.

If the person making the report prefers, he will have the option of remaining anonymous, in which case every measure will be taken to ensure the confidentiality and safety of the person making the report.

The person making the report can do so using the mechanisms made available by Drummond Ltd. in the name of the Ethics Committee, which is made up of representatives from the Legal, Human Resources, Materials, and Internal Audit Departments.

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Means made available by Drummond Ltd. for submitting a report:




If the person prefers to provide identification when using these means, he or she may be summoned to expand on the report, and will also receive a formal response regarding the actions taken to deal with the events reported. It is worth highlighting that the answer presented by Drummond Ltd. will describe the work done inside the company to process the report, without any kind of detail on the internal actions taken by the company.

Regardless of whether or not the person making the report provides identification, the information must be provided with context and supported by evidence, whenever possible.

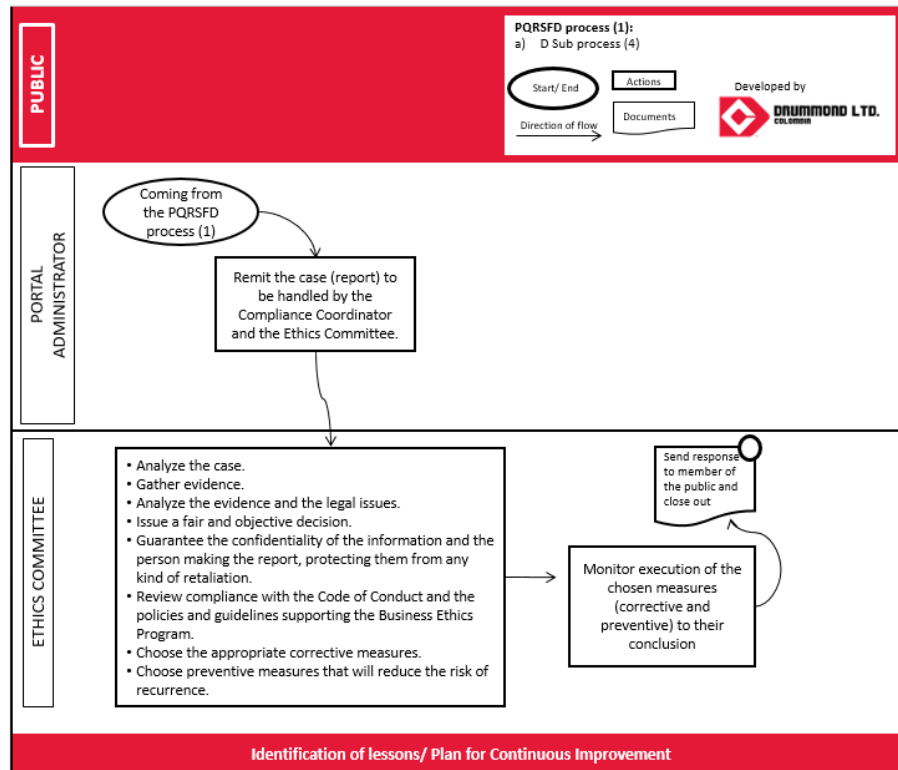
Decisions and/or recommendations made by the Ethics Committee will be notified to the areas involved in the report, who must report to the Committee the actions taken with respect to employees, suppliers, contractors, and other third parties involved with Drummond Ltd. that failed to comply with the Code of Conduct and/or the policies of the Business Ethics Program.

If it is concluded as a result of investigations that there has been a violation of the policies, regulations, contracts, and agreements, among others, disciplinary processes may be initiated. This is notwithstanding a possible termination of the contractual relationship. In addition, if the findings have any other kind of incidence, complaints may be filed with the competent authorities.

The company will implement all possible means to make the different stakeholders aware of the existence of the Reporting Channel.


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2.1 Flowchart for the reporting process (4) using the online portal.



To keep in mind:

- If the case enters the Online Portal as a report, during the evaluation process it will be sent to the **Reports** project. Only authorized persons may enter this project, as determined by the company's Ethics Committee. The case will be subject to an investigation, meeting all the guidelines determined for the mechanisms for reporting irregularities and presenting claims (<https://www.drummondLtd.com/quienes-somos/politicas-y-compromiso/Policy>)
- Drummond Ltd. guarantees that any report submitted using the Online Portal will be managed in compliance with the principles of predictability, confidentiality, and anonymity described in this Manual.

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3. OFFICES FOR ATTENTION TO THE COMMUNITY

Drummond Ltd. has the following offices for attention to the community, for the use of all stakeholders:

Puerto Drummond, Ciénaga

KM 10 Vía Ciénaga – Santa Marta

Hours for attention:

Monday to Friday: 7:00 a.m. - 12:00 m. - 2:00 p.m. - 5:00 p.m.

Valledupar, Cesar

Calle 12 No. 8-42, Of. 303 and 304

Edificio Orbe Plaza

Hours for attention:

Monday to Friday: 8:00 a.m. - 12:00 m. - 2:00 p.m. - 5:00 p.m.

Bogotá

Calle 72 No.10-07, Of. 1302

Phone: (+57-1) 587-1000

Fax: (+57-1) 210-2054

Hours for attention:

Monday to Friday: 8:00 a.m. - 12:00 m. - 2:00 p.m. - 5:00 p.m.

La Loma, Cesar

Calle 4 # 4-104,

Calle central

Hours for attention:

Monday to Thursday: 8:00 a.m. - 12:00 m. - 2:00 p.m. - 5:00 p.m.

Friday: 8:00 a.m. - 12:00 m.


La Jagua de Ibirico, Cesar

Tv. 6 #3-15

SENA, Centro de Operación Minera

Hours for attention:

Wednesday: 9:00 a.m. - 12:00 m.

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4. TELEPHONE LINES FOR ATTENTION

- Ciénaga, Magdalena: Phone: (+571) 432-8000 Ext. 8072
Phone: (+57-5) 432-8000
- La Loma, Cesar Phone: (+575) 571-9300 ext. 8830- 8832
- Valledupar, Cesar Phone: (+575) 571-9300 ext. 8982
- Bogotá : Phone: (+57-1) 587-1000
Fax: (+57-1) 210-2054

Attention will be provided via telephone during the hours established for the Offices for Attention to the Community.

5. EMAILS


These are the emails the company has established for attending to its stakeholders:

- atencionalusuario@drummondLtd.com
- atencionalusuariop@drummondLtd.com

Note: Although both emails are enabled to receive any type of case, generated anywhere, in compliance with the Community Relations Policy, and to efficiently serve our communities in the direct area of influence, it has been established that atencionalusuario@drummondLtd.com will also work for cases in the Department of Cesar and atencionalusuariop@drummondLtd.com for the Department of Magdalena.

6. MAILING ADDRESS

The company's mailing address for receiving any type of notification is:
Calle 72 No. 10-07, Oficina 1302, Bogotá, D.C.

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7. WEB PAGE

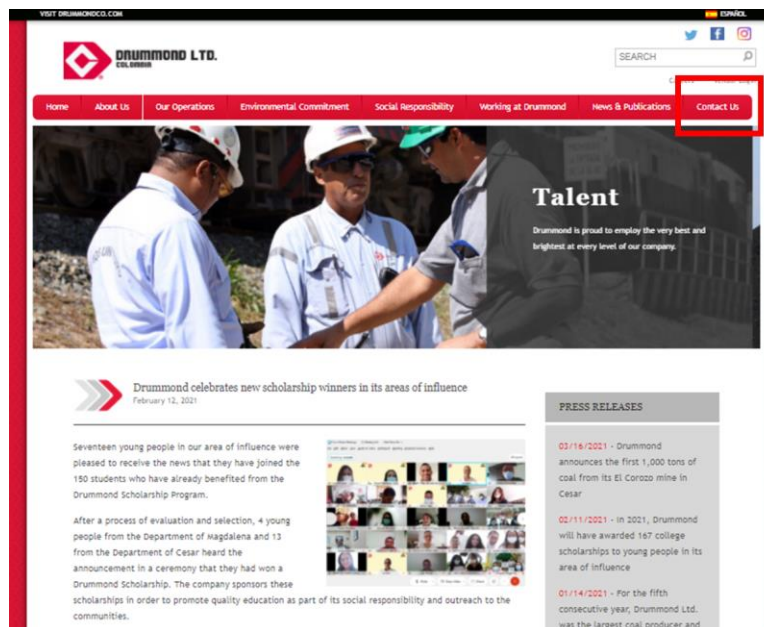
<https://www.drummondltd.com/>


Our corporate webpage is our channel for online communication with our stakeholders. It has been designed to provide information about the company and to interact with the public.

It is a tool for outreach and an aide to meeting the company's objectives for transparent, direct, timely, and accurate communications.

On our webpage the public can learn about the history of Drummond and who we are, learn about our operations, and about our actions in the area of sustainability. They will also find information related to our corporate governance, with all of our policies and commitments (<https://www.drummondltd.com/quienes-somos/politicas-y-compromiso/Policy>) that make Drummond Ltd. a world-class operation.

The webpage provides access to the Online Portal in the section called Contact Us (<https://drummond.boreal-is.com/portal/drummond>), permitting interaction and feedback from stakeholders, as an excellent resource for building trust.



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VIII. ABC'S OF THE STAKEHOLDER ATTENTION SYSTEM

- **Do petitions, complaints, claims, suggestions, congratulations, and reports have to have a specific structure or content?**


Yes. To facilitate understanding and processing of your PQRSFD, make sure it contains the following information at the least:

1. The subject of the PQRSFD
2. The reasons for submitting it
3. Supporting documents if you so wish
4. Your first and last names or the name of your representative and/or agent, indicating the identity document, location (place from where you are writing), email address for receiving correspondence, and telephone number. If you are a juridical person, indicate company information.

- **When will I receive an answer?**


At the time you enter your PQRSFD using any of the channels for attention, in the Portal, the system will automatically generate a case number to confirm receipt, providing information about response time, and whether receipt will be confirmed using an additional means. The company has the following business days depending on the type of case, as stipulated in Law 1437 of 2011:

- All petitions must be resolved within the fifteen (15) days following their receipt. The resolution of the following types of cases will be subject to a special term:
 1. Petition for information and request of documents: A maximum term of ten (10) business days.
 2. For any other type of request (petitions, complaints, claims, suggestions, congratulations, or reports) or rights to petition that are general or of private interest, the term stipulated is a maximum of fifteen (15) business days following the date it is received.
 3. Any query or request that requires analysis and evaluation by the company must be resolved in a maximum term of thirty (30) business days and the user will be informed of the case status.

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To keep in mind:

- When, on an exceptional basis, it is not possible to resolve the case within the time limits indicated here, the company must inform the stakeholder of this circumstance before the expiration of the term indicated in the law. It must state the reasons for the delay and at the same time indicate a reasonable term in which the case will be resolved or an answer will be given, which may not exceed double the term initially established.
- Companies have the legal right to issue a negative response to the user as deemed appropriate. Relative to the right to petition private parties, companies are required to respond to the request when its purpose is to safeguard basic rights or is connected to those rights, and answers to rights to petition may be negative only if such an answer does not violate the right to petition.
- Drummond Ltd. will respond to matters under its direct competency. But it has no authority to intervene in conflicts that may arise with people outside of the company, and it cannot answer for the obligations of third parties.
- **If someone doesn't know how to read or write, how can they present their petitions, complaints, claims, suggestions, congratulations, or reports?**
 In the case of nonreaders, they can request help from a family member or close friend in order to fill out their petition using the portal. Or they can also go personally to an Office for Attention to the Community, or use one of the phone numbers for attending to the public.
- **Can I submit a PQRSFD to different departments at the same time?**
 Yes, using the previously mentioned channels.
- **Can I submit a PQRSFD anonymously?**
 Yes, using any of the channels, especially the Online Portal which is set up for this type of request.

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IX. PERSONS RESPONSIBLE

- **Vice President of Sustainability:** Define adjustments required to this Manual as part of the continuous improvement process, and monitor compliance.
- **Community Relations:** Manage the channels and tools assigned to ensure attention to the petitions, complaints, claims, suggestions, congratulations, and reports made by stakeholders, following the guidelines in this Manual. Implement a plan for dissemination and communication to help the different stakeholders learn about the SAP.
- **All areas of the company:** Respond in a timely manner to the petitions, complaints, claims, suggestions, congratulations, and reports sent to their areas and under their jurisdiction, in compliance with what is described in this Manual.
- **VP of Public Affairs and Communications:** Follow-up on the requests that so require in terms of possible impacts and/or violations of the exercise of the rights of our stakeholders.
- **Ethics Committee:** Attend to reports presented using the different channels of the System for Attention to the Public, enforcing compliance with the Code of Conduct and the policies of the Business Ethics Program, strengthening an organizational culture based on values and ethics. Respect the confidentiality and anonymity of members of the public who submit a case with this request.
- **All stakeholders:** Know the channels established by the company and use them responsibly, maintaining a continuous dialogue and respectfully expressing observations about those channels, as part of the process for continuous improvement.

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X. REFERENCE DOCUMENTS

- Sustainability Policy
- Community Relations Policy
- Human Rights Policy
- Mechanisms for reporting irregularities and submitting claims
- United Nations Guiding Principles on Business and Human Rights
- The 8 effectiveness criteria of the ICMM (International Council on Mining and Metals) in its guidance 'Human Rights in the Mining & Metals Sector: Handling and Resolving Local Level Concerns and Grievances.'