HUMAN RIGHTS MANUAL



1. OBJECTIVES

CNE OIL & GAS establishes guidelines that direct the management and promotion of human rights, aimed at: (i) respecting human rights within the sphere of influence of the company, and (ii) promoting good practices for respect and promotion of human rights.

This Human Rights Manual was issued in consistency with the internal policy of the Company and the applicable national and international standards.

2. DEFINITIONS

Human rights respect and promotion monitoring committee: This committee directs and controls the strategic Plan of CNE OIL & GAS as to human rights.

Negative consequence on human rights: When, by reason of an act, the ability of a person to enjoy his/her human rights is eliminated or reduced.

HR: Human rights are rights inherent to all human beings, regardless of nationality, place of residence, sex, national or ethnic origin, color, religion, language, or any other condition. We all have the same human rights, without any discrimination whatsoever. These rights are interrelated, interdependent and indivisible.

Due diligence: Process that allows CNE OIL & GAS to identify the specific risks related to human rights, arising from the operational context, with the purpose of adopting the necessary measures to prevent, mitigate and repair the damages caused, if applicable.

Human rights risks: When, by reason of an act, the ability of a person to enjoy his/her human rights is eliminated or reduced.

3. GENERAL CONDITIONS

3.1. Roles and Responsibilities

The definition of the guidelines that direct the management of human rights in CNE OIL & GAS and the verification of compliance with them are carried out by the Office of the Legal Manager. The implementation of the Policy and this Human Rights Manual is a responsibility of each and every one of the various areas of the company.

BODY	FUNCTION
General Management	 Appoint the Human Rights Respect and Promotion Monitoring Committee.
Human Rights Respect and Promotion Monitoring Committee.	 Direct, control and approve the Strategic Plan on Human Rights. Conduct regular human rights assessments.

VERSION (31-07-2018)



HUMAN RIGHTS MANUAL

	Approve improvement plans.
Office of the Legal Manager	 Coordinate the Strategic Plan on Human Rights. Develop the Strategic Human Rights Plan and follow up on its implementation. Define the human rights dissemination and training program. Resolve complaints, petitions and claims related to human rights. Implement the risk identification process.
Other Areas	 Implement activities related to the Strategic Human Rights Plan. Implement improvement plans and adopt corrective actions.

3.2. Development of the Strategic Human Rights Plan

For the implementation of this Manual, the following elements of a management model guided by the general commitments and principles established in the human rights Policy are established, under the direction of the human rights respect and promotion monitoring Committee.

3.2.1. Planning

In the process of planning the management of CNE OIL & GAS with respect to human rights is set out in the Human Rights Policy that guides the issues contained nthis Manual, as well as the definition of the Strategic Human Rights Plan.

The planning of human rights management of CNE OIL & GAS will consider the results of the risk analysis, the reports related to petitions, complaints and claims, judicial actions and reports related to human rights. It will also take into account regulatory changes and the development of good practices in this field.

3.2.2. Identification, assessment and management of risk and impacts on human rights

In compliance with the due diligence process, CNE OIL & GAS develops a process to identify the risks and negative impacts on human rights arising from the activities carried out by the Company, with the purpose of establishing the relevant plans for their management. The definition and implementation of the risk identification process will be carried out by the Office of the Legal Manager with the support of the other areas of the organization.

VERSION (31-07-2018)

HUMAN RIGHTS MANUAL



3.2.3. Human Rights Dissemination and Training

The Office of the Legal Manager will develop a comprehensive training program for new employees of CNE OIL & GAS, developing the overall framework of the internal policy and the guidelines for respect and protection of human rights.

Likewise, an annual human rights dissemination and training program is established for employees and contractors, in order to disseminate and generate knowledge on the tools needed for respect and promotion of human rights.

In addition, there is a virtual human rights training. This is a tool to support human rights learning from the business framework.

3.2.4. Petitions, complaints and claims

A form for petitions, complaints and claims will be established for the timely, transparent and effective reception and attention of requests that are motivated by impact on human rights arising from the activities of the company.

3.3. Verification of Compliance with the Strategic Human Rights Plan

The verification of compliance with the strategic human rights plan is aimed at monitoring progress in meeting the commitments set out in CNE OIL & GAS guidelines.

The Office of the Legal Manager is in charge of this verification of compliance, and it must be carried out through the following instruments:

- a. Strategic Plan Implementation Review: Progress in the implementation of the strategic plan must be reviewed on a six-monthly basis in accordance with the set guidelines, based on the information reported by each area in charge. If the set guidelines require to be adjusted, the relevant preventive and corrective actions must be recorded, assessing the effectiveness of the same.
- **b. Human Rights Report:** From the analysis of petitions, complaints and claims, a six-monthly report will be made where the most relevant topics will be identified.
- c. Sustainability Report: The Office of the Legal Manager must ensure the inclusion of information related to human rights respect and promotion in the sustainability report of the company
- **d. Risk control measures assessment:** The areas responsible for the implementation of actions related to negative impacts on human rights must make an assessment of the results obtained from the implementation of the strategic plan.

VERSION (31-07-2018)