
Human Rights Manual

1. Objectives

Canacol Energy LTD, its affiliates and subsidiaries (collectively “Canacol” or the “Company”) establishes the guidelines that direct the management and promotion of human rights, aimed at: (i) respecting human rights within the scope of influence of the Company and (ii) promoting best practices for respect and promotion of human rights.

The Human Rights Manual (the “Manual”) was issued in accordance with the Company’s internal policy and the applicable national and international standards.

2. Definitions

Human Rights Respect and Promotion Monitoring Committee: This committee directs and controls the Company’s Human Rights Strategic Plan (the “Strategic Plan”).

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.

Human rights: Human rights are inherent rights of all human beings, without any distinction 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. These rights are interrelated, interdependent and indivisible.

Due diligence: The process that allows Canacol 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 damage 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 Canacol and the verification of their compliance are a responsibility of Canacol’s Legal Department.

The implementation of the Human Rights Policy and of this Manual is a responsibility of each and every one of the different areas of the Company.

Body	Function
Management	<ul style="list-style-type: none"> • Appoint the Human Rights Respect and Promotion Monitoring Committee members.
Human Rights Respect and Promotion Monitoring Committee.	<ul style="list-style-type: none"> • Direct, control and approve the Strategic Plan. • Conduct periodic human rights assessments. • Approve improvement plans.
Legal Department	<ul style="list-style-type: none"> • Coordinate the Strategic Plan. • Prepare the Strategic Plan and follow up 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	<ul style="list-style-type: none"> • Implement activities related to the Strategic Plan. • Carry out the implementation of improvement plans and the adoption of corrective actions.

3.2. Development of the Strategic 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 Canacol management’s planning process with respect to human rights, the Human Rights Policy establishes and guides the issues contained in this Manual, as well as the definition of the Strategic Plan.

Canacol’s management will consider the results of the risk analysis, the reports related to petitions, complaints and claims, judicial actions and denunciations that are related to human rights. It will also consider the regulatory changes and the development of best practices in the field.

3.2.2. Identification, evaluation and management of human rights risks and impacts

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

3.2.3. Human rights dissemination and training

Canacol’s Legal Department will develop a comprehensive training program for new employees, focusing on the general framework of the internal policy and the guidelines for the 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 about the tools necessary for respect and promotion of human rights.

Additionally, there is virtual training on human rights, which is a tool to support learning about human rights from the business framework.

3.2.4. Petitions, complaints and claims

A form will be established for the timely, transparent, and effective receipt and attention of human rights requests, petitions, complaints, or claims derived from the Company's activities.

3.3. Verification of Compliance with the Human Rights Strategic Plan

The verification of compliance with the Strategic Plan is aimed at monitoring the progress made in complying with the commitments established in Canacol's guidelines.

The Legal Department is responsible for the verification of compliance, to be carried out through the following instruments:

- a. Strategic Plan Implementation Review:** Progress in the implementation of the Strategic Plan must be reviewed bi-annually in accordance with the established guidelines and based on the information reported by each area in charge. If it is necessary to adjust the established guidelines, the respective preventive and corrective actions must be recorded, evaluating the effectiveness of the same.
- b. Human Rights Report:** Based on the analysis of petitions, complaints, and claims, a bi-annual report will be made where the most relevant topics will be identified.
- c. Sustainability Report:** The Legal Department must ensure the inclusion of information related to the respect and promotion of human rights in the company's Sustainability Report.
- d. Evaluation of risk control measures:** The areas responsible for implementing the actions related to negative impacts on human rights must carry out an evaluation of the results obtained from the implementation of the Strategic Plan.