
Security and Human Rights Procedure

1. GENERAL OBJECTIVE

Establish guidelines for the relationship between Canacol (hereinafter the “Company”) and those responsible for maintaining public and private security in the area of operation, as well as implement a procedure in case of violation of human rights by those responsible for maintaining public and private security, in the performance of their functions.

2. SPECIFIC OBJECTIVES

- 2.1.1 Establish guidelines to maintain the security of the Company’s operations within a framework that guarantees respect for human rights and fundamental freedoms, in accordance with the Guiding Principles of the United Nations Organization and the Voluntary Principles on Security and Human Rights.
- 2.1.2 Identify steps to be followed in order to establish relationship with and support from the Public Force and private security contractors.
- 2.1.3 Assign responsibilities to the members of the physical security team as to relationship with and support from the Public Force and private security contractors.
- 2.1.4 Ensure permanent lines of communication with the authorities in the areas of operation of the company, as well as with private security contractors.
- 2.1.5 Maintain cordial relations and harmonious collaboration with members of the Public Force and private security contractors.

3. SCOPE

This document is applicable to security area personnel, members of the Public Force and private security contractors, within the framework of activities for the maintenance of public and private security of the Company’s assets and personnel.

4. RESPONSIBILITY

The Security Management is responsible for the relationship with the Public Force and private security contractors within the Company. For this it has Physical Security Coordinators, Field Security Specialists and Security Specialists and Supervisors hired through a private security company.

The responsibility for implementing and applying this procedure lies with or corresponds to the area of Security and other areas related to actions of relationship with the public and private force established in the internal procedures.

The regular channel for the reporting and management of any situation that arises within the operations of the company must be maintained at all times and any determination must always be approved by the Security Management.

5. DEFINITIONS

- **Riot:** Tumult, mutiny or disturbance that differs from the previous one in that it is a manifestation of a violent nature and disruption of public order.
- **Security Coordinator:** Person who reports to the Security Management, in charge of managing the means for the fulfillment of security processes within the Company.
- **Due Diligence:** The process of due diligence as to human rights enables companies to identify, prevent and mitigate actual or potential negative impacts of their activities, as well as report on how these impacts are addressed. Due diligence can be integrated into other risk management systems existing in the company, as long as it is not limited only to identifying and managing significant risks for the company itself, but also includes the risks of negative impacts.
- **Human Rights:** Human rights are rights inherent to all human beings, without any distinction of nationality, place of residence, sex, national or ethnic origin, color, religion, language, or any other condition. These rights are interrelated, interdependent and indivisible.
- **International Humanitarian Law:** International humanitarian law specifically regulates situations of armed conflict. Concretely, international humanitarian law regulates the use of means and methods of warfare, and aims to ensure the protection and humane treatment of persons not directly participating.
- **Deterrence:** It is the action of the authorities aimed at using comprehensive and adequate means within their reach, within the framework of coordination and co-responsibility to avoid the use of legitimate force, together with the means provided by administrative authorities such as dialogue and mediation with the people involved.
- **Field security specialist:** Person in charge of risk management in the field.
- **Public Force:** The Public Force of Colombia is established by the Constitution of Colombia in its Seventh Chapter as composed exclusively of the Military Forces (National Army, Air Force, Navy) and the National Police; established for the defense of sovereignty, independence, integrity of the national territory and the constitutional order; and the maintenance of the necessary conditions for the exercise of public rights and freedoms, and to ensure peace among Colombian inhabitants.
- **Stakeholders:** Groups that are directly or indirectly affected by the development of the activity, which also have the capacity to directly or indirectly affect the development of the Company.
- **Alternative conflict resolution mechanisms:** They consist of peaceful actions that favor verbal, respectful and constant dialogue between the authorities, control agencies and protesters, for the resolution of conflicts and disagreements, as well as for the prevention of acts of violence and the containment of the use of force by the National Police.

- **Security Personnel:** All Company personnel performing security tasks in the Company's projects/operations.
- **Private Security Personnel:** Personnel engaged to provide a private security service in the Company's projects/operations, whose tasks are performed under the service contract entered into between the private security provider and the Company.
- **Public Security Personnel:** Members of the Public Force of the State, whose mandate is to maintain law and order in the Company's area of operation.
- **Guiding Principles on Businesses and Human Rights:** The Guiding Principles, based on the United Nations "Protect, Respect and Remedy" Framework, are a set of 31 principles addressed to States and businesses that clarify the duties and responsibilities of both with respect to the protection of and respect for human rights in the context of business activities, and the access to an effective remedy for individuals and groups affected by such activities.
- **Voluntary Principles on Security and Human Rights:** A set of principles of a voluntary character intended to help extractive companies maintain the security of their operations within an operational framework of guarantee of respect for human rights and fundamental freedoms and, where appropriate, of international humanitarian law.
- **Protest:** Public expression of objection, disapproval, or dissent towards an idea or course of action, typically political. Protests can take many different forms, from individual statements to mass demonstrations.
- **Unified Command Post – PMU [for its Spanish initials]:** Considered as an inter-institutional coordination body whose purpose is to organize, supervise, and take the actions it may deem necessary to guarantee the rights of citizens, both those who carry out peaceful demonstrations and those who do not participate in them, it must remain before, during and after the demonstration. The Unified Command Post shall be composed of representatives of the following entities: the governor's office, when appropriate, the mayor's office, the National Police, the Office of the Attorney General of the Nation, the Office of the Inspector General of the Nation, the Office of the Ombudsman, the Office of the Municipal Procurator and the Fire Department.
- **Physical Security:** Activities, generally of prevention and detection, aimed at the physical protection of the Company's resources.
- **Public Security:** It is related to the State or country where the company performs its operations. It usually includes military and police forces. The Voluntary Principles apply to public security as long as they are protecting company assets.
- **Private security:** Security services offered by a provider contracted by the company. According to the specifications of the Voluntary Principles, private security is a complement to public security and should only assume functions of a defensive nature.
- **Security supervisor:** Person in charge of access control at a facility, (may fulfill other roles according to instructions of the security coordination).
- **Use of Force:** It is the material, necessary, proportional and rational means used by uniformed personnel of the National Police, as a last physical resort to protect the life and physical integrity of people, including that of themselves, without prior written order, to prevent, impede or overcome the threat to or disruption of coexistence and public security, in accordance with the law, under the terms of article 166 of Law 1801 of 2016.
- **Differentiated use of force:** It is presented according to the levels of resistance that can be exerted by the person intervened in a procedure. The differentiated use of force must be understood dynamically, being

able to escalate or de-escalate according to the level of resistance. Its gradual application shall be based on the principles of legality, necessity, rationality and proportionality, in accordance with the provisions of the National Code of Security and Citizen Coexistence.

- **Human rights violations:** Any transgression of the human rights of a person, group or community. For the purposes of this Plan, only the violation of human rights on the occasion of activities related to the maintenance of security shall be taken into account.

6. PRINCIPLES THAT GUIDE THE RELATIONSHIP WITH PUBLIC AND PRIVATE SECURITY PERSONNEL

The Company's relationship with the Public Force and private security contractors is based on the rules, standards and instruments established in the Company's Human Rights Policy, especially the following:

- Universal Charter of Human Rights
- Guiding Principles on Businesses and Human Rights
- United Nations Global Compact
- Voluntary Principles on Security and Human Rights

In this sense, it is expected that the Company's relationship with public and private security personnel be carried out with full observance of the Human Rights and in accordance with the following guidelines:

- 6.1 The Company's security personnel, public security personnel and private security personnel must act under the principle of harmonious collaboration.
- 6.2 The Company shall guarantee the opening of effective and expeditious communication channels with public and private security personnel.
- 6.3 Security personnel shall undertake to provide public order, security and/or human rights information relevant for the proper conduct of the Company's business operation.
- 6.4 The Company shall carry out human rights training activities aimed at public and private security personnel.
- 6.5 The Company shall take into account public and private security personnel in the identification of human rights risks, impacts and opportunities related to the maintenance of security, as well as in their monitoring, follow-up and remediation.
- 6.6 The Company shall hold regular meetings with public and private security personnel, in order to address issues related to human rights within the framework of security maintenance activities and design joint strategies and action plans to prevent and mitigate identified security and human rights risks.
- 6.7 The Company shall facilitate access to mechanisms for the attention of petitions, requests, complaints, claims and/or denunciations and shall provide clear information on how to access such mechanisms.
- 6.8 Public and private security personnel shall support the Company in complying with and implementing the Voluntary Principles on Security and Human Rights.

- 6.9 The Company shall guarantee spaces for dialogue between public and private security personnel and stakeholders.

7. PROCEDURE

Although it is true that Voluntary Principles are not binding, their guidelines provide companies with resources for their operations to be safe, and to ensure respect for human rights in three important aspects of management:

- Risk assessment: Companies must assess security risks and the possibility of occurrence of human rights violations.
- Public security: Companies must interact with public security in order to promote the protection of human rights.
- Private security services: Likewise, companies must interact with private security services to promote the respect for human rights.

7.1 IDENTIFICATION AND MANAGEMENT OF HUMAN RIGHTS RISKS AND OPPORTUNITIES

The risk management process in security and human rights is framed within the Company's risk and opportunity management process. In accordance with the policy defined by the Company for Risk and Opportunity Management (POPLN-01), this system promotes the integration of risk criteria into all company processes, as well as the establishment of risk management indicators for all employees, areas, and processes of the Company. The managed risks and opportunities are classified into the following categories: Strategic, Tactical, Operational, and Emerging, as applicable, based on the methodology specified in the ISO 31000 standard.

In order to identify the human rights risks and opportunities associated with the Company's security processes, the following important aspects must be considered:

- Context of conflicts.
- Provision of security.
- Governability and socioeconomic and physical environmental conditions of a project in a given country or region.

7.2 RELATIONSHIP WITH THE PUBLIC FORCE

The most relevant aspects to be taken into account for the relationship with the public force must be established during the risk identification and management process.

Based on the above, the procedure establishes the following development:

INITIAL APPROACH

- 7.2.1 Upon arrival in an area, identify the Public Force authorities responsible for the jurisdiction.
- 7.2.2 After identifying the authorities, the first approach must be made to make a presentation and make

known the company and the activities that will be developed in the area.

- 7.2.3 Inquire about the conditions of public order in the jurisdiction.
- 7.2.4 Consult the unit immediately above, to which the unit responsible for the jurisdiction where the project is located reports.
- 7.2.5 Report on the activity to the Security Coordination.
- 7.2.6 Make an appointment with the Commander of the superior unit to make a presentation and report on the company's projects (according to instructions, this meeting is conducted by the person who is in the field or the Security coordinator).
- 7.2.7 Prepare a directory with telephone contacts of the authorities of the area. Periodically check and update the directory of authorities.
- 7.2.8 Always maintain a good relationship and communication with local authorities without committing to support.
- 7.2.9 In the event that any authority requests support, it must be processed through the Security Coordination to raise it to the Security Management.
- 7.2.10 A written record must be made with a photographic record of the delivery of support to the authorities.

REQUEST FOR SUPPORT TO THE PUBLIC FORCE WITHIN THE FRAMEWORK OF DECREE 003 OF JANUARY 5, 2021, "STATUTE OF REACTION, USE AND VERIFICATION OF THE LEGITIMATE FORCE OF THE STATE AND PROTECTION OF THE RIGHT TO PEACEFUL CITIZEN PROTEST"

- 7.2.11 An event occurs in the operation.
- 7.2.12 The event is reported to the Security Coordination.
- 7.2.13 The situation is formally reported to the authorities (Police) by filing a document generated by the legal area, with the District Police command as to the preventive action and with the municipal police inspection as to the police protection in the jurisdiction where the protest, strike or blockade is presented.
- 7.2.14 The Security Coordinator informs the Security Management, which is responsible for authorizing if the presence of the Public Force is required at the site.
- 7.2.15 In the case of authorities at the Brigade or Division level (Army) or at the Police Department Command level, they shall be coordinated directly by the Security Coordination and Management according to instructions.
- 7.2.16 If the presence is authorized, the security person in the field accompanies the Public Force to the site, explaining the occurrence of the event.
- 7.2.17 Take photographic and video record of the presence of the authorities.
- 7.2.18 In case the Public Force (Police – ESMAD [Spanish acronym for Mobile Anti-Riot Squadron]) must act, stay out of the situation and allow them to develop their procedures.
- 7.2.19 Maintain a good relationship with Public Force personnel during the support.

- 7.2.20 Support the Public Force personnel with necessary resources during their stay at the site.
- 7.2.21 Thank the Public Force personnel for the support provided.
- 7.2.22 In the event that agreements are not reached with the communities during the demonstration, strike or blockades, comply with the Protocol of preventive, concomitant and subsequent actions, called “Statute of Reaction, Use and Verification of the Legitimate Force of the State and Protection of the Right to Peaceful Citizen Protest”.
- 7.2.23 Monitor the development of the dialogues, once the coordination and activation tables of the PMU are installed, which are in charge of Proposing mechanisms for dialogue and coordination between the communities and the company.

7.3 RELATIONSHIP WITH PRIVATE SECURITY CONTRACTORS

The relationship with private security contractors shall be carried out in accordance with the guidelines established in the contract for the provision of services that is entered into with the private security providers contracted by the Company for the maintenance of physical security in the Company's area of operation.

Without prejudice to the foregoing, private security contractors must comply with the guidelines established in this procedure that are applicable to them, according to the nature of their functions and the contract entered into with the Company.

7.4 PROCEDURE IN CASE OF VIOLATION OF HUMAN RIGHTS IN THE FRAMEWORK OF PUBLIC OR PRIVATE SECURITY ACTIVITIES

In the event of the occurrence of a human rights violation within the framework of security maintenance activities, the Company's security personnel shall take the following actions, as appropriate:

- 7.4.1 The Company receives a request, petition, complaint, claim or denunciation related to an alleged violation of Human Rights within the framework of security maintenance activities.
- 7.4.2 The area that received the report for the alleged violation of Human Rights shall bring the case to the attention of the Company's Security Area within 48 business hours of notification of the case.
- 7.4.3 The security area of the Company shall conduct a preliminary investigation to know the circumstances of time, manner and place in which the alleged event would have occurred.
- 7.4.4 In the event that the act has been committed by an employee of the Company, the Human Talent Area shall be notified, to apply the sanctions that may be appropriate, in accordance with the provisions of the Internal Work Rules.
- 7.4.5 In the event that the act has been committed by a private security contractor, the Security Area shall inform the private security company of the fact, for it to take the actions that may be appropriate within the framework of its competences.
- 7.4.6 In the event that the act has been committed by the Public Force, the Security Area shall forward the request to the competent authority, for it to take the actions that may be appropriate within the framework of its competences.

- 7.4.7 In the event that remediation is necessary, it shall be implemented in accordance with the provisions of the Remediation Procedure (procedure code and link) .
- 7.4.8 The Company reserves the right to take the legal actions that may be appropriate, according to the particularities of the reported event.

8. MECHANISM OF PETITIONS, COMPLAINTS, CLAIMS, CONCERNS AND DENUNCIATIONS RELATED TO HUMAN RIGHTS IN SECURITY ACTIVITIES

The Company has the following mechanisms for receiving, attending, managing and following up on requests from stakeholders:

- Ethics line, for denunciations related to human rights violations, ethics and LAFT [Spanish initials for Asset Laundering and Financing of Terrorism].
- PQRI ([Spanish initials for] Petitions, Complaints, Claims and Concerns) Protocol.

These tools are aimed at maintaining a good relationship with our stakeholders, as well as preventing and mitigating the risks associated with human rights in operations.

For the handling of petitions, complaints, claims, concerns and denunciations that are related to operations or activities that involve the participation of those responsible for the maintenance of public and private security, the provisions of the Human Rights Remediation procedure and the Human Rights Denunciations procedure must be taken into account.

In addition to what is established therein, the following is recommended:

- The petitions, complaints, claims and concerns should be classified according to the scope established in memoranda of understanding or specific agreements for interaction with the public force and contractual clauses with private security providers. In the case of the public force, or if none of the aforementioned documents exists, it must be verified if it is a materialized risk and act according to the established mitigation plan.
- In the case of denunciations involving members of the public force, the competent established state authorities must be notified.¹
- For situations involving private security personnel, action must be taken in accordance with what is provided in the contractual clauses and pursuant to the parameters of the Voluntary Principles, the International Code of Conduct for Private Security Service Providers and the standard assumed in the Human Rights Policy.

9. FOLLOW-UP

The Physical Security Area, in its capacity as responsible for the document, shall conduct an annual follow-up of the same and its respective update, if necessary.

¹ See Number 10. Communication channels.

10. COMMUNICATION CHANNELS

10.1 HUMAN RIGHTS

In case of doubts, denunciations and/or alleged incidents related to human rights violations, contact the Legal Vice Presidency, at the e-mail derechoshumanos@canacolenergy.com, or access the independent denunciation line through the page <http://www.etica.resguarda.com/canacolenergy/co>.

10.2 COMPANY AND PUBLIC FORCE

The company has the following communication channels for coordination with the Public Force in the areas of operation:

- **Sustainability Management:** It interacts with the different public force commands, in this case Army, Police and National Navy.
- **Coordination of Physical Security in the field:** It interacts with Brigade commands, operations commands of the different forces in each department and Battalion commands in the different areas of operations.
- **Security Specialists in the field:** They interact with District commands, minor unit operations commands, police stations and Gaula [Spanish acronym for Unified Action Group for Personal Freedom] commands in the areas of operations.

ATTACHMENT 1 - MILITARY AND POLICE UNITS IN THE DEPARTMENTS OF OPERATION

I. DEPARTMENT OF CÓRDOBA

I.I NATIONAL ARMY OF COLOMBIA

- BRIGADE 11, Montería, Córdoba

The Eleventh Brigade, attached to the Seventh Division of the Army and headquartered in the city of Montería, department of Córdoba, was created by resolution 003 issued by the Ministry of National Defense on October 16, 1987. It is composed of five tactical units and a Gaula Group as follows:

- Airborne Infantry Battalion No. 31 Rifles, Headquarters: Cáceres, Antioquia. Infantry Battalion No. 33 Junín, Headquarters: Montería.
- Special Energy and Road Battalion No. 5 “Gr. Juan José Reyes Patria”, Headquarters: El Bagre, Antioquia.
- Instruction and Training Battalion No. 11 “Antonio Ignacio Gallardo y Guerrero”, Headquarters: Urrá – Tierralta, Córdoba.
- A.S.P.C. Battalion No. 11 “Cacique Tirromé”, Headquarters: Montería, Córdoba.
- Córdoba Gaula Group, Headquarters: Montería.
- Bajo Cauca Military Gaula, Headquarters: Cáceres, Antioquia.

I.II NATIONAL POLICE OF COLOMBIA

- CÓRDOBA POLICE DEPARTMENT COMMAND

Citizen Security Operational Command. Two Police Districts in the following municipalities:

A) District 2 Sahagún Police

- La Y
- Chinú
- Tuchín
- San Andrés de Sotavento
- Chimá
- Morrocoy
- Hobo Tablón

B) District 3 Police

- Planeta Rica
- Pueblo Nuevo Station

I.III AIR FORCE

Reference is made to the air force commands near operations in the following cities as follows:

A) Air Combat Command No. 3 (CACOM [for its Spanish acronym] 3):

- Malambo, Atlántico.

B) Air Combat Command No. 5 (CACOM 5):

- Rionegro, Antioquia.

II. DEPARTMENT OF SUCRE

II.I MARINE INFANTRY

- Marine Infantry Brigade No. 1
- Sucre Gaula Command

II.II NATIONAL POLICE OF COLOMBIA

Citizen Security Operational Command. Two Police Districts in the following municipalities:

A) District

- Corozal
- Betulia
- Sincé
- El Roble

B) District 4 Police

- San Marcos
- San Benito Abad
- Las Tablitas
- La Unión Caimito