

# FRAUD CONTROL POLICY

All CERREJÓN employees are expected to act in accordance with the highest standards of honesty, uprightness, and integrity in the performance of their functions. CERREJÓN will show zero tolerance for fraud, whether committed by employees or others, whether inside or outside the organization, and it will take immediate action (including dismissal, informing the police, and a lawsuit) against any persons committing fraud, regardless of their time of service or position with the company.

Fraud can occur internally or externally, and it may be perpetrated by employees, contractors, or suppliers, either individually or in collusion with others. Fraud is understood to consist of obtaining money, good, or any other benefit from CERREJÓN without authorization or through fraudulent means, or any intention of so doing; the intentional falsifying of CERREJÓN'S financial status; the intentional falsifying of information that may lead to a financial loss.

Management is responsible for preventing fraud, embezzlement, and other inappropriate behaviour. Each member of the management team must know the types of inappropriate behaviour that could occur within his or her area of responsibility and be alert to detect any indication of irregularities.

Each employee is responsible for guaranteeing compliance with established procedures and acting prudently and ethically so as to provide a reasonable guarantee for the prevention and detection of fraud and other irregularities.

This policy is applicable to all CERREJÓN employees, and to its contractors, suppliers, and/or any third party having a business relation with CERREJÓN.

## **Actions constituting fraud**

- The forgery or alteration of accounting entries and/or non-financial records (e.g., personnel files, security statistics, environmental documentation, etc.).
- The forgery or alteration of a cheque, wire transfer, invoice, or any other financial document.
- Dishonest manipulation of computer programs and data (e.g., alteration, substitution, destruction of records, or the creation of false records).

- Improper handling or reporting of financial transactions.
- Bribery and corruption, offering, giving, requesting, or accepting an improper advantage or recompense that might influence the decisions made by CERREJÓN or its officials (e.g., the acquisition of goods and services or contracting).
- Reveal, without authorization, confidential and proprietary information that affects the interests of CERREJÓN.
- Make false statements.
- Accept or request something of material values from any organization or individual that has or intends to have business with CERREJÓN. Exception: Gifts complying with the "Gifts Policy".
- Misappropriate funds, items of value, supplies, or other assets belonging to CERREJÓN.
- Remove or inappropriately use records and assets that are the property of CERREJÓN.
- Not declare any conflict of interest that might affect impartiality.
- Use CERREJÓN resources or time for personal gain or for the benefit of persons/organizations unconnected to CERREJÓN or for the benefit of competitors.