

## **PL-OSPB-00008 - COMPLIANCE POLICY**

### **1. MINUTES OF APPROVAL**

Policy approved by the Petrobras Board of Directors - MINUTES CA 1.690, item 2, Agenda No. 62, of 06-29-2022.

### **2. SCOPE**

Applies to Petrobras and other companies in the Petrobras System, in accordance with their corporate procedures, as provided for in Article 16 of Petrobras' Bylaws.

### **3. PRINCIPLES**

**3.1** All the company's activities and relations with its stakeholders must be based on ethics, integrity, and transparency, compliant with the applicable national and international standards, providing a safe environment for decision making.

**3.2** The company must act preventively as a priority, being able to inhibit violations of the required behaviors and attitudes, mitigating compliance risks.

**3.3** All signs of misconduct and harmful acts must be investigated, and measures shall be adopted for the immediate interruption and repair of any damage to the company, as well as the application of proportional consequences to those responsible.

**3.4** Retaliation against in good faith whistleblowers is forbidden, ensuring secrecy, confidentiality, and institutional protection to these persons.

**3.5** The company's directors and managers are responsible for supporting, unequivocally and continuously, the development and improvement of the culture of integrity.

**3.6** The company must act as an inducer of an increasingly ethical business environment, with integrity and transparency, setting a positive example for its stakeholders.

### **4. GUIDELINES**

**4.1** Maintain an effective *Compliance* Program that includes actions to prevent, detect, and remediate misconduct.

**4.2** Provide authority, independence, resources, and adequate training to the area responsible for the management of the *Compliance* Program, allowing the employees who work in it unrestricted access to information and people, including

other Petrobras System companies, necessary for the performance of their activities.

**4.3** Ensure protection to the professionals who work in the area responsible for the management of *compliance* actions against arbitrary punishments arising from the normal exercise of their attributions.

**4.4** Keep the documents related to the *Compliance* Program updated and accessible to the respective stakeholders.

**4.5** Establish appropriate mechanisms to ensure that decision making is based on compliance with the standards applicable to the company.

**4.6** Ensure that the *Compliance* Program's actions are developed in an integrated and systematized manner within or across all areas of the company.

**4.7** Identify, assess, monitor, and mitigate compliance risks on an ongoing basis, promoting continuous improvement of the *Compliance* Program and the company's processes.

**4.8** Evaluate integrity aspects in the selection of Managers and professionals in key positions defined by the company.

**4.9** Know the integrity risk of counterparties by applying the Integrity Due Diligence (DDI) process, ensuring the use of its result in decision making, monitoring, and applying the appropriate and proportional treatment to the identified risks.

**4.10** Ensure proper accounting record and control of transactions based on applicable standards to ensure reliable financial reporting.

**4.11** Encourage companies and society to promote an ethical business environment, with integrity and transparency, through external actions and partnerships.

**4.12** Disseminate, on an ongoing basis, the duty to act in strict compliance with the rules applicable to the company, promoting accountability and awareness of the importance of upstanding and ethical behavior to strengthen the culture of integrity.

**4.13** Ensure the availability of an independent channel that allows the communication to the company of any indication of misconduct, guaranteeing anonymity to the whistleblower.

**4.14** Ensure a timely investigation and adequate handling of occurrences or reports of misconduct, based on the principles of objectivity, confidentiality, and impartiality, as well as the assumption of good faith and the presumption of innocence of the individual.

**4.15** Maintain mechanisms capable of timely identifying and interrupting any misconduct and its consequences.

**4.16** Establish accountability measures applicable to cases of proven misconduct, as well as promoting the correction of weaknesses and the recovery of possible losses.

**4.17** Ensure the transparency of our business, including the evolution of the *Compliance* Program, safeguarding information considered confidential.

## **5. REFERENCES**

Lei 12.527, de 18 de novembro de 2011 (Brazilian law)

Lei 12.846, de 1º de agosto de 2013 (Brazilian law)

Decreto 8.420, de 18 de março de 2015 (Brazilian law)

Lei 13.303, de 30 de junho de 2016 (Brazilian law)

Decreto 8.945, de 27 de dezembro de 2016 (Brazilian law)

*Foreign Corrupt Practices Act – FCPA*

*Bribery Act 2010 – UKBA*

ABNT NBR ISO 37301 - *Compliance* management systems

Articles of Incorporation of Petrobras

PL-0SPB-00018 - CODE OF ETHICAL CONDUCT

Guia de Implantação de Programa de Integridade nas Empresas Estatais – Controladoria Geral da União

## 6. DEFINITIONS

**Counterparties** - relationships that are subject to the DDI procedure: a. Suppliers of goods and services to Petrobras; b. Institutions and organizations in sponsorship projects and covenants related to Communication and Social Responsibility functions; c. Customers in the domestic and foreign markets in the sale of oil, by-products and energy; d. Shipowners and brokers; e. Companies in processes of acquisition and/or disinvestment of assets and/or other Petrobras System companies; f. Companies in strategic and operational partnerships; g. Parties to the terms of cooperation and other covenants.

**Deviation of Conduct** - action or omission that represents violation, transgression or disrespect of the legislation and rules related to the *Compliance* Program and to Petrobras' Code of Ethical Conduct.

**Integrity Due Diligence** - methodology used to assign integrity risk to a counterparty that contemplates: (i) application of a questionnaire; (ii) weighting of previously identified risk factors for the types of relationships; (iii) analysis of the existence and application of a *compliance* program; and (iv) analysis of the counterparty's ability to mitigate the identified risks. During the entire DDI, counterparties are assured of extensive communication with the area responsible for conducting the procedure, in order to resolve doubts about the analysis of information, as well as the result attributed by the responsible area. The DDI procedure is applied to all counterparties in previously defined relationships based on risk analysis. This procedure results in the Integrity Risk Rating (GRI); therefore, it can be assigned as low, medium, or high.

**Compliance Risks** - risks related to Petrobras' *Compliance* Program, covering the compliance with the legislation and regulations applicable to Petrobras' business and operations, the compliance with internal policies and procedures, and the observance of values, ethical principles, and conduct guidelines.