

BENM

HOW TO REPORT

GUIDELINES FOR QUALIFYING REPORTS

Petrobras' General Ombudsman

This project aims to inform Petrobras' stakeholders about the Ombudsman channels, as well as clarify the minimum elements necessary for reports, especially those of a highly personal nature, to be eligible for investigation.

INDEX

03	PRESENTATION
04	OMBUDSMAN CHANNELS
05	OTHER SERVICE CHANNELS
06	WHAT IS A REPORT?
07	HOW IS THE REPORT HANDLED?
08	WHO INVESTIGATES A REPORT?
09	WHAT WILL BE ANALYSED?
10	EVIDENCE IN HIGHLY PERSONALIZED ACCUSATIONS
11	INFORMATION GUIDES
12	REPORTS OUTSIDE THE SCOPE OF PETROBRAS

Annually, we receive various communications from individuals and legal entities that interact with Petrobras through our Ombudsman channels. Requests, complaints, requests for access to information (LAI), and inquiries about potential conflicts of interest constitute the majority of services provided by Petrobras' General Ombudsman. Issues related to ethical and behavioral deviations, and non-compliance with standards or procedures that require some investigation by a specialized area, constitute formal complaints.

All reports within the Petrobras' System are received through the Single Reports Channel, which is independent, confidential, and impartial, operating 24 hours a day, 7 days a week, and are forwarded for analysis by the General Ombudsman's team.

This year, approximately 64% of the reports analyzed were approved for forwarding to the investigating areas.

This guide aims to clarify any questions whistleblowers may have regarding the criteria for qualifying reports, with the goal of improving the quality of reports and reducing the number of cases closed due to insufficient information.

PRESENTATION

OMBUDSMAN CHANNELS

Transparency is essential.

Our General Ombudsman's Office is part of the Petrobras' integrity system, contributing to an open dialogue with society and to a fairer company, with an environment of safety and trust.

All reports are handled with autonomy, impartiality, ethics, and confidentiality. There are four main service channels for each type of report.



Reclamação, pedido, sugestão, elogio

Envie sua solicitação pelo **Formulário Eletrônico**

Telefone

0800 2828280, de segunda a sexta, das 07h às 19h

Carta

Ouvidoria-Geral da Petrobras

Rua Henrique Valadares, 28, 17º andar - CEP 20.031-030



Denúncias

Envie sua solicitação pelo **Formulário Eletrônico**. Exclusivo para denúncias envolvendo a Petrobras, suas subsidiárias e empresas controladas.

Telefone

0800 601 6925, 7 dias por semana. 24h por dia.

Aplicativo

Baixe e instale o aplicativo Contato Seguro na sua loja de aplicativos.



Serviço de Informação ao Cidadão

Lei de Acesso à Informação, n.º 12.527/2011



Acesso à
informação

Lei de conflito de interesses

SeCI

Caso o empregado Petrobras deseje realizar consultas e pedidos de autorização para exercer atividade privada e demais situações no âmbito da Lei de Conflito de Interesses (Lei nº. 12.813/2013), acompanhar as demandas em andamento e interpor recursos contra as decisões emitidas, acesse o **SeCI** - Sistema Eletrônico de Prevenção de Conflito de Interesses.

Access the form:

<https://petrobras.service-now.com/falecomaouvidoria>

Access the form:

<https://www.contatoseguro.com.br/petrobras>

Access the Transparency Portal: [Link](#)

[Portal da Transparência](#)

Access the Federal Government's Electronic System for Preventing Conflicts of Interest:

[Link para o SeCI](#)

OTHER SERVICE CHANNELS

The Petrobras' system has direct, specialized service channels segmented by audience or demand.

In addition, we have two important social and psychological support channels and a support channel aimed at all Petrobras' employees.

**Psychological and
Social Support On-Call
Service**
0800 287 2267

. (In case of fatality, imminent risk of death, workplace accident, and disappearance of the worker). Available 24 hours a day for the entire workforce.

Support Channel
0800 287 2270

or in person at facilities where there is a local health service.
Specialized care for situations of sexual violence and workplace violence.



SAC (Serviço de Atendimento ao Cliente)

Canal de atendimento exclusivo a cliente do Sistema Petrobras.



WhatsApp Petrobras

Este número não recebe ligações.
Orientação para redirecionamento aos canais adequados de demandas por informação.

Ouvidoria Saúde Petrobras

A Saúde Petrobras conta com uma ouvidoria própria para atendimento de seus beneficiários. Você deve registrar sua demanda diretamente no link da Saúde Petrobras.



Atendimento ao Fornecedor

Canal dedicado ao atendimento da rede de fornecedores da Petrobras. Possui um telefone para pedidos de bens, pagamentos e Notas Fiscais.

0800 728 9001

Atendimento de segunda à sexta, das 7h às 19h.

<https://www.canalcliente.com.br/>

+ 55 21 96940-2116



[Petrobras Saúde](#)

+55 21 3876-7070

<https://www.canalfornecedor.petrobras.com.br>

WHAT IS A REPORT?

A report is a description of facts that indicate the practice of illegal acts or irregularities, the resolution of which depends on the action of investigative bodies. A report should not be confused with a complaint. A complaint consists of expressing dissatisfaction, discontent, or protest regarding a service provided or professional conduct.

HOW TO REPORT?

Any individual or legal entity can file a report, choosing whether or not to identify themselves.

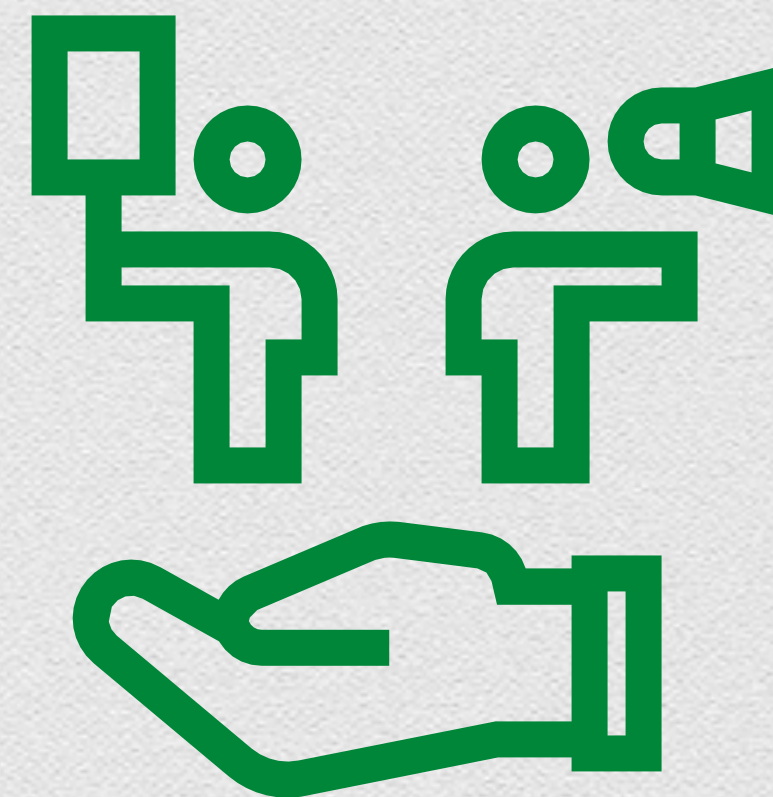
I IDENTIFY MYSELF, MY IDENTITY WILL BE PROTECTED?

Yes. If you choose to identify yourself, all your personal data will be protected, in accordance with Act No. 13460/2017 and Decree No. 10153/2019.

Only when it is essential to the investigation, especially in cases involving the issue of moral and/or sexual harassment, may the whistleblower's data be identified to enable the investigation. This circumstance is exceptional and occurs upon request and justification from the investigating unit. In all cases, the whistleblower is also protected, including against possible acts of retaliation.

Regarding the issue of Harassment, it is important to note the provisions of the Lilac Guide, prepared by the CGU (Brazilian Comptroller General's Office).

THE REPORT POINTS TO AN
IRREGULAR SITUATION, NON-
COMPLIANT WITH THE
PROCESSES, NORMS,
PROCEDURES OR THE CONDUCT
OF PROFESSIONALS IN THEIR
LABOR RELATIONSHIPS.



HOW IS THE REPORT HANDLED?

WHAT DOES THE OMBUDSMAN DO WHEN RECEIVING A REPORT?

Upon receiving a report (anonymous or identified), the Ombudsman's Office carries out a technical and impartial analysis of it, in order to verify if there are sufficient elements to initiate an investigation of the narrated facts by the competent areas.

IF MY REPORT IS GENERIC AND LACKS SUPPORTING EVIDENCE, WHAT HAPPENS?

A report received by the Ombudsman's Office will only be considered admissible if it contains minimum descriptive elements or evidence that allows the competent area to arrive at such elements, observing the minimum requirements of relevance, authorship, and materiality. Therefore, in the case of a generic report, without the necessary minimum requirements, the Ombudsman's Office may request the respective supplementary information from the whistleblowers, unless the report is anonymous. In the case of anonymous reports that are not considered admissible, they are archived due to "lack of clarity / insufficient data".

WHO ANALYZES THE STATEMENT THAT DEALS WITH ACTS OF RETALIATION?

Reports received regarding retaliatory practices against whistleblowers by Petrobras' employees are forwarded to Corporate Integrity.

CAN I TRUST THAT MY REPORT WILL BE PROPERLY HANDLED?

Yes. Both the Ombudsman's Office and the investigation areas have the institutional mission of promoting integrity. Therefore, all reports deemed eligible are duly forwarded, and their status is updated until completion and effective resolution through the Reports Channel.

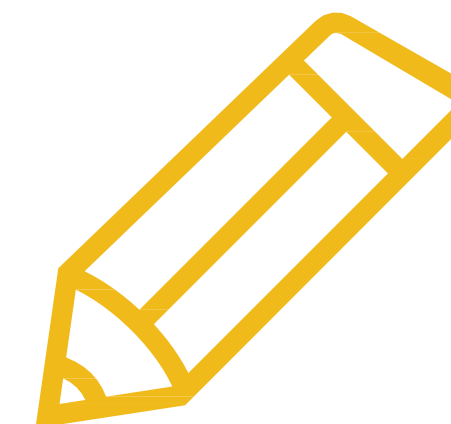
DO I NEED TO REGISTER SEVERAL REPORTS ABOUT THE SAME EVENT?

No. It is important that instead of registering several reports about the same event, you register one report that is rich in detail, paying attention to the guidelines contained in this guide.

THE DETAILED FLOW FOR
RECEIVING AND HANDLING
REPORTS IS OUTLINED IN
PETROBRAS' INTERNAL PROCESS
STANDARDS; PLEASE CONSULT
THE MANAGEMENT SITE.

REMEMBER:

*Filing a false or
defamatory report
constitutes a crime
under the law, and
may subject the
perpetrator to
civil and criminal
liability.*



WHO INVESTIGATES A REPORT?

The report is analyzed by the specialized team of the General Ombudsman's Office. If the report contains sufficient grounds for investigation, it is forwarded to the responsible areas according to the subject matter.

FOR REPORTS OF **WORKPLACE AND SEXUAL VIOLENCE**, THE INVESTIGATION AREA IS DETERMINED BY THE **PERSON ACCUSED**.

I. If the accused person belongs to the **service provider's** staff: the investigation of the report will be carried out by the service provider company with which the accused individual has an employment relationship and monitored by the management area responsible for the contract;

II. If the accused person is a Petrobras employee: depending on the type of violence, the investigation may be conducted by Corporate Integrity (INC), Corporate Intelligence and Security (ISC), or the employee's management area (two hierarchical levels above the accused person).

FOR **BUSINESS REPORTS**, THE AREA OF INVESTIGATION WILL BE DETERMINED ACCORDING TO THE **REPORT CLASSIFICATION GROUP**. THUS, REPORTS BELONGING TO THE GROUP OF:

- **Compliance Incidents**, will be investigated by Corporate Integrity (INC);
- **Corporate Security Incidents**, will be investigated by the Intelligence and Corporate Security (ISC);
- **Health, Safety and Environment (HSE)**, will be investigated by the HSE;
- **Human Resources**, will be investigated by the HR, except in cases of impediment or suspicion.

IT IS WORTH MENTIONING THAT THE EXISTENCE OF A CONFLICT OR SITUATION TO BE DEALT WITH IN AN AREA DOES NOT NECESSARILY REQUIRE INVESTIGATION WITH ACCOUNTABILITY.



*At the end of the investigation, the result will be communicated to the whistleblower through the **REPORT CHANNEL***

WHAT WILL BE ANALYZED?

Legitimacy of the Whistleblower: verification of whether the whistleblower has the legitimacy to file the report, that is, whether s/he is an interested party or has direct knowledge of the reported fact.

Basis for the Report: the report must be well-founded, with the presentation of concrete facts and evidence to support the allegations. Generic or unfounded accusations are generally not eligible for investigation.

Competence of the Body: verification of whether the body or authority receiving the report is competent to handle the matter. The report must be forwarded to the correct body so that it can be properly processed.

Classification: the report must correspond to a violation of current legal norms or regulations. It is necessary that the reported conduct be classified as an infraction, crime, or administrative violation.

Whistleblower Identification: although some reports may be anonymous, identifying the whistleblower can facilitate admissibility, as it allows the competent authority to seek more information or clarification, if necessary.

Good faith: the report must be made in good faith, with the legitimate intention of correcting an irregularity and not for reasons of revenge, unfair competition or other ulterior motives.

These criteria help ensure that only serious and well-founded complaints are accepted and processed, avoiding the waste of resources and time on unfounded or malicious allegations.

MINIMUM INFORMATION

DESIRABLE

QUALIFYING

WHO

IDENTIFY WITH THE MAXIMUM DETAIL THE PERSON WHO COMMITTED THE IRREGULARITY AND THOSE INVOLVED.

WHAT

A DETAILED NARRATIVE OF THE FACTS, WITH AS MUCH INFORMATION AS POSSIBLE REGARDING THE REPORTED IRREGULARITY.

WHEN AND WHERE?

SPECIFIC IDENTIFICATION OF THE LOCATION WHERE THE EVENTS DESCRIBED IN THE REPORT TOOK PLACE.

WHY?

POSSIBLE CIRCUMSTANCES THAT MOTIVATED THE PRACTICE OF THE IDENTIFIED IRREGULARITY, IF KNOWN.

NAME, WORKPLACE, THE COMPANY YOU WORK FOR.

IDENTIFY THE CIRCUMSTANCES SURROUNDING THE IRREGULARITY, DETAILING HOW IT OCCURRED.

IDENTIFY THE PERIOD (DATE/TIME) IN WHICH THE IRREGULARITY OCCURRED.

INDICATE POSSIBLE WITNESSES WHO CAN BE CONTACTED TO SPEAK ABOUT THE MATTER AND WHERE TO FIND THEM.

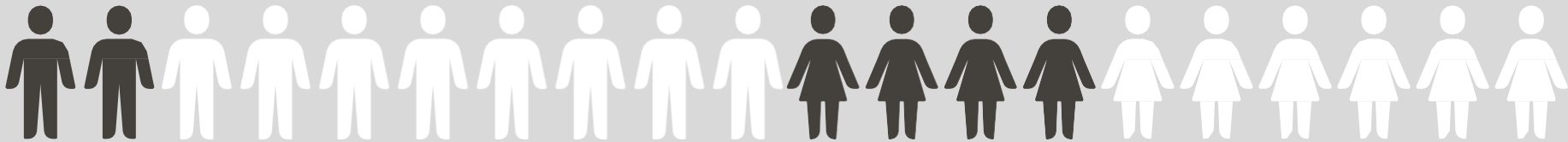
REPORT IF THERE ARE ANY IMAGE OR AUDIO SYSTEMS THAT COULD PROVIDE EVIDENCE OF THE FACTS.
PLEASE INFORM US IF YOU WITNESSED THE SITUATION YOU ARE REPORTING OR IF YOU ONLY HEARD ABOUT IT.

INFORM THE JOB POSITION OF THE REPORTED INDIVIDUAL.

USE CLEAR AND OBJECTIVE LANGUAGE; AVOID IRONIC EXPRESSIONS, SWEAR WORDS, AND/OR INSULTS.

EVIDENCE IN HIGHLY PERSONALIZED ACCUSATIONS

Investigating allegations of workplace violence requires gathering various pieces of evidence to ensure that the facts are properly investigated and appropriate measures are taken, as well as ensuring that all parties involved have the opportunity to present their versions and that the truth is established based on concrete evidence.



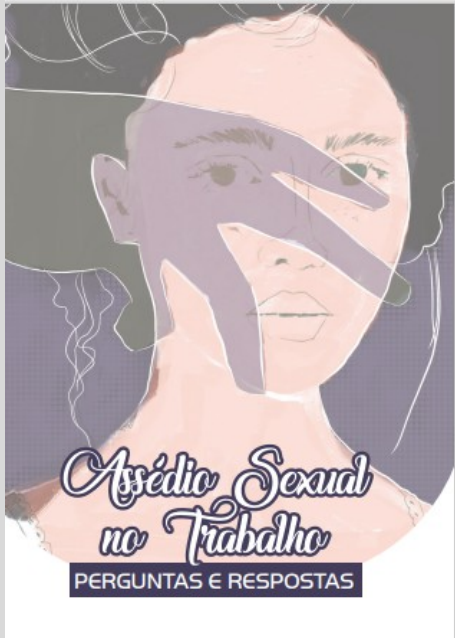
TESTIMONIES FROM PEOPLE WHO WITNESSED THE EVENTS (WITNESSES)	Written testimonies or accounts from people who witnessed the events.
DOCUMENTS	Emails and records of electronic communications containing evidence of violence, harassment, or inappropriate behavior; meeting notes or records made by the victim about the incidents; Medical documentation: medical or psychological reports attesting to the effects of the violence on the victim's health.
VIDEO AND AUDIO RECORDINGS	Images/audios captured by security cameras that show incidents of violence or records of conversations or meetings that contain evidence of abusive behavior.
PERFORMANCE AND DISCIPLINARY RECORDS	Performance evaluations that may show changes in the victim's behavior or performance after the incidents. Or previous disciplinary records against the perpetrator or related to incidents of violence.
PHYSICAL EVIDENCE	Photographs of physical injuries or damage caused by violence to a person, or damage to equipment or furniture.
BEHAVIOR ANALYSIS	Psychological assessment of the abuser and the victim to understand the context and impact of the incidents. Identifying patterns of abusive behavior on the part of the abuser.
PREVIOUS REPORTS	Records of previous reports filed against the abuser or in favor of the victim, which may indicate a pattern of behavior.
INTERVIEWS WITH THE VICTIM(S)	Gathering detailed information directly from the victim about the incidents and their impact.
INTERVIEWS WITH THE ABUSER	Opportunity for the accused person to present their version of the facts and respond to the accusations.
SUPPORT OF SPECIALISTS	Guidance from specialized professionals to ensure that the investigation is conducted fairly and impartially.

INFORMATION GUIDES

GET TO KNOW THE
GUIDELINES FOR PREVENTION
AND TREATMENT OF MORAL
AND SEXUAL HARASSMENT
AND DISCRIMINATION IN THE
FEDERAL GOVERNMENT

Guia Lilás

MPT GUIDEBOOK ON SEXUAL
HARASSMENT AT WORK



ACESSE O LINK

GUIDE TO PREVENTING AND
COMBATING
DISCRIMINATION, MORAL
HARASSMENT AND
SEXUAL VIOLENCE



ACESSE O LINK

Você sabia que

Assédio sexual por chantagem é crime?

Desde 2001, o art. 216-A do Código Penal prevê:

“Constranger alguém com o intuito de obter vantagem ou favorecimento sexual, prevalecendo-se o agente da sua condição de superior hierárquico ou ascendência inerentes ao exercício, emprego, cargo ou função”.

A pena prevista é de detenção, de 1 (um) a 2 (dois) anos.

SOURCE: MPT GUIDEBOOK - SEXUAL
HARASSMENT AT WORK: QUESTIONS AND
ANSWERS.
BRASILIA, MAY 2017

REPORTS OUTSIDE THE SCOPE OF PETROBRAS

IN CASE OF A REPORT OF VIOLENCE OUTSIDE THE COMPANY, IT IS IMPORTANT TO SEEK HELP IMMEDIATELY.



Police Station:

- *Seek out the Specialized Police Station for Women (DEAM), if one exists in your city. These police stations are prepared to handle cases of violence against women in a sensitive and specialized manner.*
- *If there isn't a DEAM, any police station can register the incident.*



Women's Help Center - Call 180:

- *It is a free and confidential service, available 24 hours a day, throughout Brazil. In addition to providing guidance on women's rights, the 180 hotline can forward complaints to the appropriate authorities.*



Public Prosecutor's Office:

- *You can contact us to report violence against women, especially if there is a need for protective measures or legal proceedings.*



Public Defender's Office:

- *The Public Defender's Office can offer free legal assistance to victims of domestic violence, helping them obtain protective measures and assist in legal proceedings.*



Local Support Network:

- *There are NGOs and other organizations that support women and offer assistance, including shelter, psychological support and legal guidance.*

IT IS CRUCIAL TO SEEK
SUPPORT AND ENSURE SAFETY
AS QUICKLY AS POSSIBLE.
IN CASE OF EMERGENCY, DO
NOT HESITATE TO CALL THE
MILITARY POLICE AT 190.



THIS GUIDE IS AN INTERNAL PUBLICATION OF
THE PETROBRAS' GENERAL OMBUDSMAN'S
OFFICE.