

Internal Regulations of the Integrity Committee

Approved by the Board of Directors on
September 21, 2023

INTERNAL REGULATIONS OF THE INTEGRITY COMMITTEE

1. Purpose

The Integrity Committee ("Committee") is a non-statutory permanent body, reporting to the Board of Directors, whose purpose is to define, standardize, and monitor the application of the consequences system for Petrobras' employees and Legal Entities that interact with the Company, contributing to the Company's integrity system.

1.1. The decisions of the Integrity Committee and its members are binding, and managers must comply with them immediately after receiving the decision notices, observing the possibility of requesting reconsideration or appeal.

2. Scope of Action

- a) Investigation of compliance incidents;
- b) Investigation of corporate security incidents;
- c) Investigation of moral harassment, discrimination, and retaliation;
- d) Investigation of sexual violence;
- e) Occurrence identified by the management units, with clear, unequivocal and robust evidence, in which there is no need for an internal investigation procedure, referring to the topics mentioned in items "a" and "b";
- f) Non-compliance with the application of disciplinary measures defined by the Integrity Committee;
- g) Judgment of Administrative Responsibility Processes (PAR), as well as issues arising from them;
- h) Application of the rules provided for in Article 23 of Petrobras' Bylaws regarding the indemnity commitment.

3. Composition

3.1. Members

3.1.1. The Committee shall consist of three members appointed and subject to removal by the Board of Directors.

3.1.1.1. In the selection of members of the Integrity Committee, diversity aspects related to gender and/or race should be considered.

3.1.2. The members of the Committee shall not have alternates.

3.1.3. The Committee members shall be chosen through a selection process conducted by a specialized company, with one selected among Petrobras' employees and two external members.

3.1.4. The internally chosen member must be exclusively dedicated to the activity and will have the responsibilities of secretary and coordinator of the Integrity Committee.

3.1.5. External members may not perform other activities internally, but may perform activities outside the Company, as long as that compatibility is assessed and approved by the Board of Directors.

3.2. Term of office

3.2.1. The members of the Integrity Committee shall have non-coinciding terms of office of 3 (three) years.

3.2.2. The term of office of the members may not exceed 6 (six) consecutive years.

4. Responsibilities

4.1. It is the individual responsibility of the members of the Integrity Committee, in the matters assigned to them, within the terms of item 5.6 of these Internal Regulations:

- a) Verify the regularity and completeness of the procedures related to their scope of action;
- b) Convene, at their discretion, employees, former employees, managers, members of Senior Management, members of the investigation team, or any other necessary person to provide the appropriate explanations;
- c) Analyze proposals for disciplinary measures, the execution of Commitment Agreements, or dismissal without accountability;
- d) Propose Notification and Conduct Adjustment - NAC, in cases provided for in internal standards, when no Commitment Agreement has been executed in a previous phase;
- e) Define, with fairness, transparency, independence, and considering possible precedents of the collegiate body, the disciplinary measures to be applied by the Company's managers to Petrobras employees mentioned in occurrences/investigations carried out by the Company or companies controlled by Petrobras;
- f) Recommend to the Integrity Committee, equivalent body, or Highest Authority of the controlled companies, a suggestion for disciplinary measures to be applied to their employees in occurrences or investigations identified within Petrobras, with the employee's originating company evaluating the recommendation and implementing it effectively;
- g) Define, with fairness, transparency, independence, and considering possible precedents of the collegiate body, the appropriate consequences for former Petrobras employees, as if they were still active, mentioned in occurrences/investigations carried out by the Company or companies controlled by Petrobras, in cases where compensation related to separation incentive programs has been suspended;

- h) Define the appropriate consequences related to former Petrobras employees mentioned in occurrences/investigations carried out by the Company or companies controlled by Petrobras;
- i) Inform the investigation units, HR, the General Ombudsman (when the investigation originates from the Whistleblower Channel), and the immediate supervisor of the employee or General Structure Holder or General Manager of the Business Unit in which the employee is assigned, as applicable, of the result of their deliberation and any recommendations that require action;
- j) Judge the Administrative Responsibility Processes (PAR) initiated by Petrobras, holding the Legal Entity accountable or dismissing the case, and forwarding the decision to the Instigating Authority of said PAR;
- k) Identify the reports that should be sent to the LEGAL department to assess the appropriate submission to external bodies or other legal proceedings;
- l) Identify the reports that show the existence of losses eligible to compensation and determine to the Manager the evaluation of adopting appropriate measures to recover the values;
- m) Forward to the competent Unit for the initiation of a PAR the assessment of the eligibility of a PAR, if the evidence in the report indicates the existence of a potential harmful act committed against the Company, in accordance with Law 12,846/2013;
- n) Evaluate the requests for reconsideration filed against their individual decisions, deciding on the review of the original decision or, if maintained, by submitting the request for analysis by the Integrity Committee, as an appeal;
- o) Deliberate on the implementation and compliance with the sanctions applied in the PAR and issues related to the decisions issued in the judgment stage; and
- p) Deliberate on appeals filed by legal entities regarding the application of precautionary measures during the PAR.

4.2. The Integrity Committee is responsible for:

- a) Verifying the regularity and completeness of the procedures related to its scope of action;
- b) Deliberating on requests for reconsideration in appeal proceedings regarding disciplinary measures presented by the manager and/or the sanctioned employee;
- c) Recommending to the People Committee (COPE) the appropriate consequences for members of Senior Management (including former members of the Board of Directors and the Executive Board) and external members of the committees mentioned in occurrences/investigations conducted by the Company, as well as monitoring the actions taken;
- d) Informing the People Committee (COPE) of decisions that have determined the inadmissibility of applying the consequences system concerning members of Senior Management (including former members of the Board of Directors and the Executive Board)

and external members of the committees of the Board of Directors, who have been mentioned in the Company's internal investigations as a possible authors of non-compliance, through a monthly report;

- e) Adjudicating the requests for reconsideration in appeal proceedings of the Administrative Responsibility Processes (PAR) instituted by Petrobras;
- f) Deciding on the application of the rules provided for in Article 23 of the Petrobras' Bylaws, in cases of exclusions and the reasonableness of the amounts involved, in accordance with the Application and Governance Policy of the Indemnity Commitment;
- g) Informing the investigation areas, HR, the General Ombudsman (when the investigation originates from the Whistleblower Channel), and the immediate supervisor of the employee or the General Structure Holder or General Business Unit Manager, in which the employee is assigned, as appropriate, of the results of the Committee's deliberations and any recommendations that require action;
- h) Acting in the process of disseminating best practices and corporate guidelines related to the topics within its scope;
- i) Assisting, when requested, the People Committee, the Board of Directors and the Fiscal Council in the application of the consequences system for Senior Management and external members of the committees of the Board of Directors.

4.3. The individual responsibilities of the members of the Integrity Committee are:

- a) Reviewing and requesting information about matters under examination by the Committee;
- b) Preserving the honor and image of the individuals involved in the investigated facts;
- c) Acting with equality, transparency, independence, and impartiality;
- d) Acting in compliance with corporate norms, especially those provided for in PP-1PBR-00510 - EMPLOYEE DISCIPLINARY REGIME AND SYSTEM OF CONSEQUENCES FOR SENIOR MANAGEMENT AND FISCAL COUNCIL and PP-1PBR-00532 – MANAGING ADMINISTRATIVE PROCESS OF LIABILITY OF LEGAL ENTITIES;
- e) Declaring to the other members any conflicts of interest regarding the Committee's work and abstaining from participating in such cases;
- f) Forwarding their individual deliberations on the matters provided for in item 4.1 to the Committee Coordinator for appropriate action;
- g) Ensuring that all demands are analyzed in a timely manner, ensuring effective immediacy, impartiality, and equality in their decisions.

4.4. The Coordinator is responsible for:

- a) Proposing an annual work plan to the People Committee;
- b) Deciding on inviting external participants to the Committee's meetings, taking into account any potential conflicts of interest;

- c) Monitoring the effective implementation of disciplinary measures for employees with HR;
- d) Reporting the result of the PAR judgments to the Company's President;
- e) Reporting individually deliberated cases to the collegiate body, including the full decisions in the minutes;
- f) Submitting analyses and reports prepared by the Committee to the Board of Directors;
- g) Coordinating the annual evaluation process of the Committee, based on the annual work plan approved by the People Committee ; and
- h) Ensuring the faithful compliance and updating of this Internal Regulations.

5. Meetings

5.1 Frequency

5.1.1. Meetings of the Integrity Committee will be held weekly, unless there is insufficient agenda.

5.1.2. Extraordinary meetings shall be held whenever necessary.

5.2 Meeting Location

The Integrity Committee shall meet at the Company's facilities or virtually, if necessary, provided that the effective participation and authenticity of its members' statements can be verified.

5.3 Meeting Agenda

5.3.1. The agendas of the Integrity Committee meetings shall be defined according to the demands and priorities established by the Coordinator and shall be sent in advance to the other members.

5.3.2. Any Committee member may propose the inclusion of a new item on the agenda during the meetings, subject to evaluation by the Coordinator regarding its pertinence.

5.4 Meeting Procedures

5.4.1. The proceedings shall follow the following order:

- a) Presentation of the agenda items;
- b) Deliberation on the agenda items;
- c) Other communications of interest to the Committee; and
- d) Recording of the meeting minutes.

5.5 Quorum for Installation and Deliberation

5.5.1. The Integrity Committee shall meet with the presence of all its members, unless there is an impediment, absence due to vacation or legally justified leave.

5.5.1.1. In cases of absence of a Committee member, the Legal, Compliance, or HR holder, in that order, shall be called to assume the Committee's membership and shall follow the provisions of this Regulations.

5.5.2. Decisions shall be made by a majority vote of the members present.

5.5.2.1. In the analysis of appeals regarding disciplinary measures of termination of employment, if the Committee does not reach a consensus, the matter shall be referred to the People Committee for deliberation.

5.5.2.2. Deliberations related to the application of Article 23 of the Company's Bylaws must have the presence of both external members of the Committee, except in case of impediment, in which case the Legal, Compliance, or Human Resources representative, in that order, must be called.

5.6. Distribution Rules for Matters

5.6.1. Matters will be distributed, in order of receipt, to the members of the Committee by its Coordinator.

5.6.1.1. Matters related to previous deliberations may be distributed to the same member.

5.6.1.2. In case of vacation, absence, impediment, or conflict of interest of one of the members of the Integrity Committee, the matters will be distributed to another member, following the rotation order.

5.7. Other Participants

5.7.1. Guests invited by the Committee to participate in meetings, in order to clarify possible questions regarding investigations, shall not participate in the deliberations.

5.7.2. Calls to attend meetings must be promptly answered by the employees and executives of the Company, except in extraordinary situations, duly justified.

5.7.3. Company units must prioritize the demands of the Integrity Committee and comply with the indicated deadlines.

6. Information Confidentiality

The confidentiality of information must follow the Company's Information Security policy and standards, as well as the legislation and other rules that regulate its activities, especially regarding confidentiality.

7. Administrative Support to the Integrity Committee

7.1. Secretarial activities will be supported by the Petrobras General Secretariat, providing support, when necessary, for the following actions:

a) Arrange the invitations for the Committee members and guests, according to the meeting schedule;

- b) Provide the necessary material and administrative support;
- c) Review the minutes and other supplementary work documents of the meetings;
- d) Collect the signatures of the Committee members and any guests;
- e) Archive the meeting minutes;
- f) Provide copies of the minutes, when mandatory; and
- g) Assist in responding to inquiries from external and internal control bodies regarding matters within the Committee's competence, in coordination with the relevant units.

7.2. The Committee may rely on technical support from Company units whenever necessary.

8. Conflict of Interests

8.1. Committee members must observe the legal and internal norms related to conflict of interests and, when applicable, declare themselves ineligible.

8.1.1. Ineligibility will occur in cases where the Committee member:

- a) Has a direct or indirect interest in the matter;
- b) Has participated or will participate, in another administrative or judicial process, as an expert, witness, or legal representative of the party under investigation in the analyzed investigative process, or of their respective spouse, partner, or relatives up to the third degree;
- c) Is in litigation, either judicial or administrative, with the party under investigation in the analyzed investigative process, or with their respective spouse, partner, or relatives up to the third degree;
- d) Is the spouse, partner, or relative up to the third degree of the party under investigation in the analyzed investigative process;
- e) Is an intimate friend or notorious enemy of the party under investigation in the analyzed investigative process, or of their respective spouse, partner, or relatives up to the third degree;
- f) Is a creditor or debtor of the party under investigation in the analyzed investigative process, or of their respective spouse, partner, or relatives up to the third degree; or
- g) There is any situation that could constitute a conflict of interests.

8.2. Additionally, the following actions constitute conflict of interests and are prohibited:

- a) Providing services to suppliers, customers, and service providers of Petrobras, those who are in the process of entering the register, those participating in bids, or individuals or legal entities involved in judicial or extrajudicial disputes with Petrobras and/or its corporate holdings;

- b) Providing services to individuals or legal entities involved in investigations or defendants in lawsuits related to crimes against public administration and acts of administrative impropriety suffered by Petrobras and/or its corporate holdings;
- c) Engaging in activities and/or providing services to Petrobras or its corporate holdings that are unrelated to their role as a Committee member; and
- d) Becoming an administrator, attorney, manager, advisor, intermediary, or engaging in any activity, paid or unpaid, or appearing only as a technical responsible, in any entity that transacts with Petrobras or competes with its corporate holdings in the production of goods and services.

9. Performance Evaluation

- 9.1. The Integrity Committee's activities must be monitored and evaluated by the People Committee, with regular agendas for accountability and performance, as defined by it.
- 9.2. The Integrity Committee must conduct an annual performance evaluation, based on the goals of its annual work plan, and the results will be reviewed by the People Committee, with the knowledge of the Board of Directors.

10. General Provisions

- 10.1. The regimetal provisions regarding the operation of the Committee will be defined by the Board of Directors and may be altered at the discretion of its members or upon proposal by the Committee.
- 10.2. Proposed revisions to this Internal Regulation must be conducted by the Governance unit.
- 10.3. The investigation areas will be responsible, according to the subject, for instructing and sending to the People Committee the recommendation of the appropriate consequence, when the participation of an Integrity Committee member in irregularities is identified, as well as monitoring the actions taken.



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