

PL-1PBR-00008 – COMPLIANCE POLICY

1. MINUTES OF APPROVAL

Policy approved by the Petrobras Board of Directors- MINUTES CA 1780, item 3, Agenda nº 88, dated September 26, 2025.

2. SCOPE

Applies to the Petrobras System, in accordance with article 16 of the Bylaws.

3. PRINCIPLES

3.1. All of the company's activities and relationships with its stakeholders must be guided by the value of Integrity, respecting applicable national and international standards, promoting a safe environment for decision-making in line with the Petrobras System Code of Ethical Conduct.

3.2. The company guides its actions through a primarily preventive approach, capable of inhibiting violations of expected behaviors and attitudes, thereby mitigating integrity risks.

3.3. All signs of misconduct and harmful acts, including harassment, discrimination, human rights violations, conflicts of interest, fraud and corruption, anti-competitive practices, violations of sanction regimes, money laundering, and terrorism financing, are investigated, with measures adopted for the immediate interruption of these irregularities and the repair of any damages to the company, as well as the application of proportional consequences to those responsible.

3.4. Retaliation against good-faith whistleblowers is prohibited, ensuring secrecy, confidentiality, and institutional protection for these individuals.

3.5. The company's directors and managers have the responsibility to continuously and unequivocally support the strengthening of integrity in the organizational culture, through example, active listening and ethical conduct in daily decisions.

3.6. The company acts as an inducer of an honest, transparent and competitive business environment, promoting ethical relationships with all stakeholders, respecting free competition practices and serving as a positive example for its stakeholders.

4. GUIDELINES

4.1. Governance

4.1.1. Maintain a Compliance Program that includes actions to prevent, detect, and remediate misconduct, ensuring that its actions are integrated and work in conjunction with all areas of the company.

4.1.2. Ensure that Senior Management exercises active and continuous oversight over the Compliance Program.

4.1.3. Ensure authority, independence, proportional resources, adequate and continuous training for the area responsible for managing the Compliance

Program, allowing employees working in it to have access to information and people, including those from Petrobras System Companies, necessary for the performance of their activities.

4.1.4. Protect professionals who work in the area responsible for managing governance and compliance actions against arbitrary punishments that may arise from the normal exercise of their attributions.

4.2. Risk Management and Controls

4.2.1. Continuously identify, assess, monitor, and mitigate integrity risks, promoting continuous improvement of the Compliance Program and the company's processes.

4.2.2. Evaluate integrity criteria in the selection of administrators, leaders, and professionals in key positions and areas of the company.

4.2.3. Assess the integrity risk of counterparties, including suppliers (ANNEX 1), through Integrity Due Diligence, ensuring the use of its results in decision-making, monitoring and providing appropriate treatment to the identified risks.

4.2.4. Establish effective and up-to-date internal controls, with periodic evaluation of their effectiveness, aiming at the integration of the three lines of action, in order to prevent or detect systemic failures, guarantee the effectiveness of the internal control environment and ensure adequate accounting records, as well as control of transactions, in accordance with applicable standards.

4.3. Dissemination of integrity in organizational culture

4.3.1. Continuously disseminate within the Petrobras System the duty to act with integrity, encouraging accountability and awareness of integrity risks including harassment, discrimination, human rights violations, conflicts of interest, fraud, corruption, anti-competitive practices and violations of sanctions regimes, money laundering and terrorist financing.

4.3.2. Promote training, campaigns and educational activities for internal and external audiences, using simple and inclusive language.

4.3.3. Whistleblowing Channel and Handling of Misconduct

4.3.4. Ensure an independent channel, accessible to any audience and widely publicized, for reporting any indication of misconduct, guaranteeing the anonymity of the whistleblower.

4.3.5. Ensure that the received complaints are investigated promptly, impartially, and with confidential treatment, based on the principles of good faith, objectivity, and the presumption of innocence of the individual.

4.3.6. Immediately stop any identified misconduct, applying corrective and accountability measures proportionate to the severity of the case.

4.3.7. Correct weaknesses in processes and internal controls, promoting organizational learning and the prevention of recurrence.

4.4. External Action and Transparency

4.4.1. Encourage companies, including suppliers, partners and other economic agents, and society to promote an ethical, honest and transparent business environment, through collective integrity actions and external partnerships.

4.4.2. Maintain updated and accessible policies and mechanisms related to the Compliance Program to stakeholders, respecting legal and strategic restrictions.

4.4.3. Ensure transparency regarding the progress of the Compliance Program, integrity actions, and commitments undertaken by the company, including on topics related to our ESG (Environmental, Social, and Governance) commitments, while safeguarding information considered confidential.

5. DEFINITIONS

Counterparties – Companies, entities and stakeholders in general with which Petrobras maintains a relationship in the development of its economic activities.

Misconduct - action or omission that constitutes a violation, transgression or disrespect for current legislation and regulations, including the provisions of the Compliance Program and the Petrobras System' Code of Ethical Conduct.

Integrity Due Diligence (IDD) - IDD is one of the mechanisms that make up Petrobras' Compliance Program. This mechanism aims to assess the integrity risk to which the company may be exposed in its relationships with third parties. The result of DDI is represented by assigning the assessed counterparty an Integrity Risk Level (IRL), which can range from low, medium, or high.

Integrity Risks – are those arising from non-compliance with the company's established values, ethical principles, and integrity requirements, as well as failure to adhere to good practices of transparency, compliance, and internal controls. The periodic analysis of integrity risks complies with the requirements of Article 57, item V, of Decree No. 11,129/2022, which regulates Law No. 12,846/2013, and Article 23 of Resolution No. 48 of the Interministerial Commission on Corporate Governance and Administration of Union Shareholdings.

6. REFERENCES

PL-0SPB-00018 - PETROBRAS SYSTEM CODE OF ETHICAL CONDUCT

Petrobras Bylaws

Lei 12,527, de 18 de novembro de 2011 (Brazilian law)

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

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

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

Decreto 11.129, de 11 de julho 2022 (Brazilian law)

Decreto 10.889, de 09 de dezembro de 2021 (Brazilian law)

ABNT NBR ISO 37301 - Compliance management systems

Foreign Corrupt Practices Act – FCPA

Bribery Act 2010 – UKBA

IIA – The Institute of Internal Auditors – IIA Three Lines Model 2020

Implementation Guide for Integrity Programs in State-Owned Companies – Office of the Comptroller General of the Union.

7. ANNEXES

7.1. ANNEX 1 – Integrity Due Diligence (IDD)

ANNEX 1 – Integrity Due Diligence

1. Supplier Integrity Due Diligence Procedure (IDD)

In accordance with articles 32, section V, and 18, section I, of Law 13,303/2016, which establish, respectively, that bids and contracts of state-owned companies must observe the integrity policy in their transactions and that the Board of Directors is the competent authority to discuss, approve and monitor decisions involving relationships with interested parties, suppliers interested in initiating and/or maintaining a relationship with Petrobras will be subject to the Integrity Due Diligence (IDD) procedure.

In compliance with the principle of impartiality, the IDD adopts isonomic and equitable criteria, based on a standardized and previously defined methodology

The analysis covers aspects such as the counterparty's profile, relationship with government agencies, relationships with third parties, and their track record and reputation. The identified integrity risk factors are weighted considering the evidence presented by the counterparty regarding the existence and effectiveness of the mechanisms that comprise its integrity program. As a result, the counterparty is assigned an Integrity Risk Level (IRL) of low, medium, or high.

2. Impacts of the Integrity Risk Level on Bidding Processes

The application of the IDD procedure may result in low, medium, or high IRL. Suppliers with high IRL will not be allowed to participate in Petrobras' contracting processes, except in the following situations: sale of assets through bidding or waiver of bidding based on value; inapplicability of bidding, as provided for in article 28, §3, of Law 13.303/2016; waiver of bidding, in the cases described in article 29 of Law 13.303/2016; and unfeasibility of competition, duly demonstrated, in accordance with the aforementioned Law and the Petrobras Bidding and Contract Regulations (Regulamento de Licitação e Contratos da Petrobras - RLCP).

Internal standards establish the steps in which the IRL must be verified in the contracting processes. If a supplier already has a high IRL, they will not be able to register for opportunities, participate in the collaboration room, and, consequently, submit bids or proposals. If a high IRL is assigned during the contracting process, the supplier will be excluded from the bidding process, regardless of the stage it is in. There are no restrictions on participating in the bidding process or contracting suppliers that have been classified as low or medium IRL, as well as those that do not have an assigned IRL.

3. Disclosure

Petrobras provides information about the IDD procedure on its website dedicated to supplier relations, allowing broad and unrestricted consultation by all interested parties. The IDD procedure steps are detailed on the Supplier Channel, accessible at: <https://canalfornecedor.petrobras.com.br/>.

4. Filing an Appeal and Publication of the Integrity Risk Level

In accordance with the principles of adversarial proceedings and full defense, after the conclusion of the IDD assessment, if a high IRL is assigned to the evaluated supplier, Petrobras will record the result on the Petrobras Purchasing Portal ("Purchasing Portal") and will

PL-1PBR-00008 – COMPLIANCE POLICY

exclusively communicate the result of the assessment to the supplier, indicating the criteria and weights that justified the assignment of a high IRL.

The supplier classified as having a high IRL may appeal the assessment result within 5 (five) business days of communication. The appeal will be reviewed by the instance responsible for assigning the high IRL, which may reconsider the decision. If the initial decision is upheld, the appeal will be forwarded to the higher instance for consideration. The appeal will be reviewed within 30 business days, and this period may be extended for an equal length of time.

After the appeal is judged, Petrobras will communicate the decision to the supplier, which may consist of reviewing the previously assigned IRL or confirming it, and will simultaneously record the result on the Purchasing Portal.

When registering the result on the Petrobras Purchasing Portal, the supplier will be again notified of the IRL that will be practiced within the scope of its commercial relationship with Petrobras.