

PetroReconcavo Code of Ethics and Conduct





The background features a pattern of light gray, wavy, concentric lines that resemble topographic contours or a wood grain texture. A thick, irregular border in green and yellow frames the central text area.

PetroReconcavo Code of Ethics and Conduct

Letter from the ceo

Value-based culture



Dear Collaborators,

Please find below PetroReconcavo's new Code of Ethics and Conduct. Since our IPO, in May 2021, our Company has focused on improving its practices and processes, building a sound foundation of ethical and transparent conduct over more than twenty years since its foundation.

The new Code is the result of our development and expansion, being the main reference of the Company's Integrity Program – an ecosystem of actions and mechanisms for the prevention, detection and response to corruption, illicit acts and ethical misconduct, developed within our Company, based on laws and best corporate governance practices. The Code aims to assist us in simple and complex deeds, in addition to the decision making process of the business, enabling us to carry out our mission of developing opportunities in the oil and gas industry, turning resources into value and dreams into reality.

Part of the dream is precisely to contribute towards a more equitable society, based on values of ethics and transparency. Such contribution is achieved through daily example, whereby, everyone must be a reference, on every front, guided by the present Code and by the Integrity Program, balancing

opportunities with diversity, dialogue with respect for the other, and developing our activities in a safe and responsible manner, seeking to generate progress and create value, in the broadest sense, for the individual and for society as a whole.

Committed to our mission, I would like to invite all collaborators and associates of PetroReconcavo to learn about this Code and share this knowledge, widely disseminating its message as an integral part of our model of operation.

In order for it to be truly effective, I invite you, above all, to undertake the commitment and the daily and permanent protagonism of a value-based culture, with ethical, responsible and sustainable actions.

Marcelo Magalhães,
CEO da PetroReconcavo

Business Pact for Integrity and Against Corruption

PetroReconcavo is a signatory to the ETHOS Institute and joined the **Business Pact for Integrity and Against Corruption**. This is a voluntary commitments undertaken by private and public companies, with the purpose of jointly promoting a more integral and ethical market and reduce different corrupt practices.

By becoming signatories of the pact, companies undertake the commitment of disseminating the Brazilian anti-corruption legislation to employees and stakeholders, in order that it may be fully complied with. Furthermore, they undertake to avert any form of bribery and excel at transparency of information and collaboration in investigations, when required.

This is our commitment.



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Our Mission

We develop opportunities in the oil and gas industry, turning resources into value and dreams into reality.



Our Vision 2025

To be the safest, most efficient and profitable independent oil and gas operator and to lead the transformation of the onshore industry in Brazil.



Our Values

- **Integrity**
We conduct our business with integrity and respect for the law. We act with consistency and transparency.
- **Respect and trust in people**
We trust people and integrate differences by promoting open and respectful dialogue.
- **Safety**
Insured to feel good, valued and safe every day.
- **Entrepreneurship**
We encourage the development of projects and solutions, combining courage, planning and innovation.
- **Enthusiasm**
We inspire people, putting enthusiasm, energy and passion in all our actions.
- **Resilience**
We overcome challenges by seeking continuous improvement, maintaining balance to face adversity.
- **Austerity**
We handle company resources responsibly, seeking the best return.

Applicability

This Code of Ethics and Conduct, the integrity guidelines and policies, as well as the Integrity Program are applied to the Company, its subsidiaries, its management and collaborators (executives, employees and trainees) working in the Company or in the name of the Company.

It is also applied to third-parties, suppliers, clients and business associates and beneficiaries, representative, that have a relationship with the Company or that represent its interests, in Brazil or abroad, will include in their contracts, associations, agreements, terms or agreements, specific clauses, according to the business carried out, whereby they commit to respect, comply with and enforce, where applicable, this Code of ethics and Conduct, the integrity guidelines and policies, as well as the Integrity Program.

Its application is ostensible to different environments, presential, remote, independently of the location where the parties are performing their activities. It also encompasses all activities developed in Brazil and/or abroad.

Code of Ethics and Conduct, integrity guidelines, other internal standards and definitions

The Code defines ethical principles, conducts, and guides essential behavioral attitudes. The integrity guidelines and other standards of the Company detail guidance and attitudes to be adopted, and should, therefore, be consulted in a complementary manner.

The lack of any specific standard to govern a certain matter is not a permission for actions or practices that overreach the interests of the Company or which permit the collaborator to acts in its name without leadership approval.

Any doubts from collaborators as to the interpretation of the Code of Ethics and Conduct may be resolved with the area of Compliance, which should be consulted, through the [Transparency Channel](#), under "Doubts", or directly, where appropriate.

In order to understand the Definitions, access the [Glossary](#).



Our Ethical Principles

1. Interests

The interest of the Company is to operate in its commercial and social practices in a transparent and ethical manner, in accordance with the laws, the Code of Ethics and Conduct, Integrity Guidelines and policies, as well as its values, which interact with each other: integrity, safety, austerity, respect and trust in people, enthusiasm, entrepreneurship and resilience, in the protection of the image and reputation of all those involved.

2. Human dignity and appreciation

All are worthy of a treatment that takes into account their physical and moral integrity, fundamental rights, individual differences, respect and appreciation.

3. Legality

The legislation, in all its instances, standards and regulations, must be complied with.

4. Honesty

Integrity and probity are attributes that must be present in actions, decision making, business and relationships, which must be conducted with ethics and a standing of combating embezzlement, fraud and corruption.

5. Professionalism

Being a formal and institutional reference in professional conduct, independently of the position or function occupied, acting with respect, loyalty, correctness, zeal, effectiveness, in order to become a standard for internal relationship and with diverse stakeholders, representing the Company's interests.

6. Transparency and accountability

Actions, relationships and businesses practiced must be transparent, in a clear manner, concise, understandable, that can be consulted, available for follow-up, review and auditing, of public interest, respecting secrecy and confidentiality of information and negotiations pertinent to each case.

7. Responsibility

Awareness to ensure the feasibility of actions and business, working with diligence and responsibility respective to the roles and assuming fully the consequences of any acts and omissions.



Expected professional conduct and decision-making

All collaborators must establish relationships of courtesy and respect in their work environment, in order to establish bonds of loyalty and trust, and a team spirit in the search for results.

Collaborators must guide their actions and decision-making based on four basic premises:

- (I) Ethically acceptable;
- (II) Legally valid;
- (III) Desirable to the Company; and
- (IV) The collaborator is willing to give transparency and assume responsibility for the action practiced.



The following conducts are not acceptable:

- **The practice of acts of physical** verbal or gestural violence, vandalism, depredation, libidinous acts;
- **Discrimination due to race**, color, region/nation, origin/social position, age, gender, civil status, sexual orientation, ideology, political opinions, religion or any other personal, physical or social condition;
- **Physical, verbal, visual or psychological** harassment creating a derogatory, hostile, humiliating, intimidating, offensive and insecure environment, either morally or sexually, or any other abusive act to human or professional dignity, any other classification protected by federal, state, municipal or district laws, codified in international conventions such as the Universal Declaration of Human Rights; contrary to the principles and commitments of this Code, of the Integrity Program.
- **Behaviors** that could upset individual susceptibilities (i.e., jokes, allusions, comments or explicit advances);
- **Exercise professional activity** under the influence of illicit drugs, alcohol, or other drugs impacting the capacity to perform activities, placing the person's life at risk and the lives of other collaborators, carrying weapons of any kind within the premises of the Company, whether having or not a firearm license.

Diversity and Inclusion

The Company promotes diversity and inclusion, prioritizing a work environment where all collaborators are treated with respect and equality, guaranteeing the right to working conditions considering the dignity of each individual with due respect.

We are committed to protect physical and psychological integrity, individuality of all involved, and we are opposed to any form of conduct causing discrimination in relation to gender, age, deficiency, region, nation, sexual orientation, ethnicity, religion, political opinions and any other form of individual diversity or that is damaging to individuals, their beliefs or preferences.

Differences in treatment shall not be considered as discrimination when justified based on objective criteria, considering the diversity of individuals, with the purpose of overcoming social inequalities.



Sustainability and Socio-environmental Responsibility

Sustainability and Socio-environmental Responsibility actions developed by the Company involve donations and sponsorships with pre-established areas of activity and aligned with Institutional Mission, Vision and Values, these being:

- **Culture:** Activities guided towards the organization of knowledge, reflection on challenges and opportunities of the modern world, promoting the democratization of access to culture, through music, painting, photography, craftwork, by means of lectures, debates, art exhibitions, cinema, theater, cultural workshops.
 - **Socio-community development:** Promoting social protagonism through actions targeting the integration of organized civil society, companies and public authorities.
 - **Education:** Support the improvement of the quality of education, through actions geared towards the development of basic education courses and technical-professional training in Communities, in order to contribute with the educational cycle for professional qualification, with the purpose of meeting the labor market demand and forming citizens who can positively contribute to society.
 - **Environmental education:** Act in an effective manner in giving awareness to the community regarding the environment, contributing towards sustainability.
 - **Sports:** Support to athletes, encouraging the practice of sports and development of actions related to quality of life, effectively working in raising awareness of the Communities regarding the importance of sports.
- **Promotion of expansion initiatives of the core business:** Supporting events, congresses, courses, initiatives that disclose, educate and expand the business segment of the Company, as well as its areas of interest, such as oil and natural gas, sustainability, best market practices and governance, ESG, integrity, among others to be analyzed critically by the Management of the Company.
 - **Social:** Support to programs and activities that assure the rights of children, teenagers, the elderly, as well as supporting activities and services developed by philanthropical, charitable or non-profit entities.

Access the [Sustainability Report](#) and learn about our social projects.



Safety and Health

It is the joint duty and responsibility of all parties to promote health and safety, physical and mental wellbeing in the work environment.

Safety as an institutional value reinforces the commitment to act in our operations in such a manner as to avoid occupational diseases and accidents.

The prevention of work related accidents is implemented through respect to the prevailing legislation, technical regulations, adequate use of equipment, training and commitment of all parties involved. Collaborators must closely comply with the regulations related to occupational safety, with the purpose of preventing and mitigating risks of accidents.

The Company seeks for harmony between work and personal life, and is committed to the development of integral health for collaborators, in order to permit a quality of life, performance of their activities and innovative potential.



The following conducts are not acceptable

- **Consumption of alcoholic beverages or illicit drugs** in the work environment or during the execution of activities, even when outside the Company's facilities, or working in a state of inebriation or under the influence of substances causing functional and behavioral interference, possibly affecting the execution of activities in a safe manner.

Access Golden Rules.

The principle of zero-tolerance to acts of corruption

The Company promotes a preventive culture based on the principle of "zero-tolerance" against the practice of illegal acts and the application of the value of Integrity and its ethical principles, honesty, transparency and accountability, which is the responsibility of all regardless of any hierarchical level, locality or area of activity.

Any form of corruption, bribery, fraud, concession or payment of undue advantages, illicit favoring, influence peddling, money laundering, concealment of income or use of accounting practices in disagreement with the legislation or relevant principles, shall be reported to the public authorities.

In order to collaborate towards the sustainability of business through the value of integrity, it is fundamental that collaborators perform their activities in a preventive manner, mitigating risks of corruption to which they be subjected to and in their daily challenges.



The following conducts are not acceptable:

1. Give, promise or offer any direct or indirect undue advantages to national or foreign public agents, or to third-parties, with the purpose of unduly obtaining or retaining any business;
2. Accept undue advantages, kickbacks or bribes, commissions, abatements, loans, favors, gratifications or advantages, as compensation or appreciation for the fulfillment of legal or functional duties;
 - I) Undue advantage means advantage that is not authorized by law, characterized as a benefit or interest achieved through illicit conduct. Undue advantage can occur through payment:
 - (a) in cash;
 - (b) gifts;
 - (c) debt write-off;
 - (d) loans;
 - (e) personal favors;
 - (f) entertainment, dinners and travel;
 - (g) donations in search for consideration;
 - (h) business opportunities, medical assistance, among other advantages;
 - II) The ban on undue advantages is also applied to immediate or affective family members, related third-parties and public agents or commercial associates. Bribery, kickback or similar payments also constitute undue advantages and are not permitted.



III) Offering or Guidelines on Gifts, Souvenirs and Hospitality receiving gifts, souvenirs and hospitality must be in accordance with the Company's, in order not to be viewed as receiving bribery, kickback and/or any other form of illegal practice.

3. Not acting, keeping silent, adopting a passive positions, omissive, or any other decision to illegitimately favor a third-party, to the detriment of the interests of the Company, even outside the Company's premises;
4. Make use of or unduly use the post or position in the Company to seize business opportunities, "influence peddling" to obtain undue advantages or furthermore, the illegal or undue use of confidential information, privileged information of the Company, or due to a business in which the Company participates, for own benefit and/or the benefit of an immediate family member/third parties;
5. Formalize or sign any agreement, covenant, collaboration, partnership or other form of agreement, to benefit, through services, donations, sponsorships, cooperation, of any kind, involving public agents and/or government entities, third-parties, in disagreement with the Company's Code of Ethics and Conduct, policies and guidelines of integrity, with the purpose of influencing or which could be interpreted as an attempt to influence and/or obtain favorable treatment or undue advantage, personal or for third-parties, under the false justification of being in favor of the Company;
6. Use, directly or indirectly, the name of the Company to make any kind of donation or contribution, even under the form of a loan or advance, to candidates, political parties, political campaigns or any other form of party organization;

7. Use the workday to help and support political parties, candidates or election campaigns;
8. Make donations, sponsorships and/or any kind of contribution, in the name of the Company, through intermediaries;
9. Use contractual instruments that conceal the true purpose of the business, scope and parties involved;
10. Make any payment, independently of reason, to public agents, directly or through third-parties, to unduly expedite or assure the execution of an action or service in relation to their normal conditions for execution or attention, especially or the act or omission can be characterized as undue favoring;
11. Counter-financing of terrorism and Prevention of Proliferation of Weapon of Mass Destruction Financing;
12. Make any payment, independently of motivation, through transactions in cash, manual (non-electronic) transactions, in disagreement with the Guideline for Prevention against Money Laundering, Counter-Financing of Terrorism and Proliferation of Weapons of Mass Destruction Financing (PLD /FTP);
13. Remain in practices, payments, negotiations and/or hires, under suspected conditions of operations and/or behaviors already listed under the Guideline for Prevention against Money Laundering, Counter-Financing of Terrorism and Proliferation of Weapons of Mass Destruction Financing (PLD /FTP), without reporting to the Transparency Channel;
14. Finance, fund, sponsor or any other form of subsidizing, personally or through third-parties, the act of illicit practices provisioned under the laws, in the Code of Conduct, and in the Company's integrity policies and guidelines;



15. Use proxy individual or legal entity to conceal or dissimulate actual interests or the identity of third-parties or beneficiaries of practiced acts;
16. Manipulate or fraud, directly or through third-parties, the process for selection and contracting of suppliers and outsourced services, either with governmental or private entities;
17. Hinder activities of investigation or inspection or public bodies, entities or agents or intervene in their activities, including regulatory agencies and supervisory bodies of the national financial system;
18. Conceal or dissimulate, personally or through third-parties, the nature, origin, location, availability, transactions or property of assets, rights or values resulting, directly or indirectly, from criminal offense, using the practice of money laundering;
19. Practice any misleading, deceptive act, to the detriment of others, obtaining illegal advantages or benefits (financial or other);
20. Unduly use the assets of the Company, such as: financial resources, assets, including scrap metal, privileged information, business opportunities for personal gain or that of third-parties, or for purposes contrary to the interests of the Company;
21. Offer, promise, give or pay kickback or bribes, non-contractual commissions, undue advantages, favors, gratifications addressed to governmental entities, public agents, politically exposed individuals, unions, private agents or others, with the purpose of influencing a decision or fulfilment of an obligation;

22. Hire a collaborator, third-party, supplier, beneficiary of a donation and/or sponsorship that is known to practice corruption and/or suspected of practicing it, not using the Company's Integrity Due Diligence process;
23. Not acting, keeping silent, adopting a passive positions, omissive, or any other decision to illegitimately favor a collaborator, third-party, potential supplier, beneficiary of a donation and/or sponsorship, public agent and/or politician, that is known to practice corruption and/or is suspected of practicing it, and not avoiding relationship with the Company, or reporting it through the [Transparency Channel](#);

The collaborator, when approached and/or upon receiving request for payment of undue advantages, must reject and, in view of the exposed situations, having witnessed and/or become aware or such, must, immediately, report the fact directly through the [Transparency Channel](#).

Access Anti-corruption Guidelines.

Prevention against money laundering, counter-financing of terrorism and proliferation of weapons of mass destruction

The Company develops and disseminates awareness and culture of prevention against money laundering, counter-financing of terrorism and proliferation of weapons of mass destruction, through permanent assessment of relationships, under the perspective the undue use of resources and assets in the practice of counter-financing terrorism, money laundering or concealment of assets, rights and values, taking the necessary steps to mitigate such risks.

The following conducts are considered as suspicious:

A. Regarding the register of physical and legal entities:

- I) Reluctance in supplying information on the identity of the collaborator and/or counterparties, such as updated documents, address, commercial activity, beneficiary(ies) of donations and sponsorships, for audit purposes, monitoring, control or purpose of the nature of the commercial relationship;
- II) Documents supplied for the register that are unusual, that seem to have been altered or counterfeited, or suspicious in any other manner;
- III) Information on the same commercial address for different legal entities, without reasonable doubt;
- IV) Alteration of bank information, in a recurring manner and without reasonable justification;
- V) Recurrent changes to the corporate purpose or name in contracts and/or bylaws of the counterparties;

- VI) Counterparties or respective shareholders or intermediaries, involved previously in money laundering investigations.

B. Regarding contracts

- I) Request for recurrent contractual amendments without reasonable justifications;
- II) Acquisitions and payment advances without associated orders;
- III) Apparently fictitious operations or with indications of over or underpricing;
- IV) Requests for the transfer of cash or checks or in a currency other than the one agreed-upon in contract, return of deposits to a third-party or to an unknown account;
- V) Fractioning of payments related to the same engagement, without reasonable justification;
- VI) Representation of different legal entities by the same proxies or legal representatives, without reasonable justification
- VII) Procurement operations using intermediaries, the participation of which is not registered in the contract;
- VIII) Request for commission not provisioned for in the contract and/or out of proportion for the services provided;
- IX) Exceptionally favorable conditions for receiving;
- X) Sale or acquisition of assets or overvalued or undervalued equity interests;
- XI) Conducting any business in a manner different to the formal procedures adopted by the Company.

C. Regarding payments

- I) Request for payment in cash, either on the part of the collaborator and/or of counterparties;
- II) Request for prepayments, not established by contract or, exceeding the established limits, in a disproportional and unjustified manner;
- III) Request for changes in bank account in the register of the counterparties, in an unjustified manner;
- IV) Transfer of donation and sponsorship funds to physical entities or philanthropical entities, in disagreement with the Company's Policy for Donations and Sponsorships, for an unknown or obscure purpose;
- V) Operations involving the legal entity, final beneficiaries, partners, shareholders, considered of favored taxation and/or privileged tax regimen by the Brazilian Federal Revenue Department (See IN RFB 1037, of June 4, 2010).

D. Regarding countries

- I) Payments made in countries other than where the service was provided, in an unjustified manner;
- II) Account register and/or request for changes to an account in countries that apparently represent a higher risk of money laundering or transfer to/from countries without any apparent connection with the counterparties or with the legitimate business of the Company (See IN RFB 1037, of June 4, 2010);
- III) Operation involving legal entity, end beneficiaries, partners, shareholders, proxies or legal representatives, domiciled in jurisdictions considered as being of high risk or with weak strategies for preventing and combating money laundering and counter-financing of terrorism by the GAFI (See <http://www.fatf-gafi.org/countries/#high-risk>)

**The following conducts are not acceptable:**

The practice of activities of payments and receiving:

- (a) Cash transactions;
- (b) Unjustified manual (non-electronic) transactions;
- (c) Commission and/or gratification for contract or conclusion of the business, granted by counterparties to collaborators;

The collaborator, upon identification and/or awareness of suspicious operations, must, immediately, reject and report such activity directly through the Transparency Channel.

The Company collaborates with the public authorities and such suspicious operations shall be immediately reported to the COAF (Council for Financial Activities Control).

Access the Guideline for Prevention against Money Laundering, Counter-Financing of Terrorism and Proliferation of Weapons of Mass Destruction Financing (PLD /FTP).

Conflict of Interest

Conflict of interest occurs in any situation representing a conflict between the personal interests of a collaborator and the interests of the Company, which could, in a concrete or apparent manner, directly or indirectly, inappropriately compromise or influence the performance of the functions of the collaborator, or the interested benefit or another, in detriment to the interests of the Company. It should be emphasized that there are conflicts of interest even in situations in which no inappropriate or harmful acts is produced by the activity or decision.



The following conducts are not acceptable:

1. Act, without prior and express authorization, as counselor, director or employee of a competitor of the Company;
2. Participation in external activities, such as taking part in political parties, collegiates, famous labor groups, institutions, NGOs, associations, organization in a remunerated or voluntary manner, affecting the capacity to satisfactorily carry out activities as collaborator or representative of the Company and in observation to the Company's image and reputation protection;
 - I) In this respect, in parallel activities, remunerated or voluntary, Collaborators must communicate to the Company, through the Declaration of External Activities Form. Depending on the activity, obtain written authorization, whereby the activity must not compromise the professional performance, and must not be of a nature contrary to the interests and reputation of the Company;
 - II) Activities writing articles, books, participation in conferences, congresses, lectures or comparable activities, in a non-institutional manner, shall not be considered as parallel work, when occasional and sporadic. However, such activities must be submitted for analysis, when topics related to the business, internal data and information, work routines, presentation of projects and results, considering that these are Company assets and must be aligned with the leadership and forwarded to compliance@petroreconcavo.com.br;



3. Take advantage or unduly use the post or position in the Company, to gain business opportunities, obtain undue advantages or even, use confidential, privileged or ownership information unduly or illegally for own benefit and/or for the benefit or family members/third parties;
4. Have financial or personal interests and/or through connection to an immediate family or affective member, with or without relevant equity interest or profit sharing interest in a competitor or in a company with which the Company has or wishes to have a business relation;
5. Become a partner or investor in a competitor, or which is becoming consolidated as a competitor, or of a supplier of the Company, if the position can influence decisions taken;
6. To be involved, directly or indirectly, or influence in the contracting of suppliers of goods and services or in the granting of sponsorships, incentives or donations, in which the Collaborator has a direct or indirect financial interest, or which an immediate family or affective member is used, in decision-making positions;
7. Conducting business with an immediate family or affective member in the name of the Company;

1 Immediate Family or Affective Members - family or affective members where it is expected that they influence or can be influenced by a person. Immediate members are presumed to be boyfriend, girlfriend, fiancé, fiancée, spouse, partner, blood-related relatives upline, up to the 2nd degree (parents and grandparents); , blood-related relatives upline or descendants, up to the 2nd degree, such as children, grandchildren; blood-related relatives in a collateral line, up to the 3rd degree of kinship, such as siblings, uncles/aunts and nieces or nephews (and their spouses); relatives through affinity in an upline, such as: in-laws (including step-parents of the spouse or partner), grandparents of the spouse or partner; parents through affinity in a downline up to the 2nd degree, such as: stepchildren, sons or daughters-in-law (including spouses or partners), grandchildren (including spouses or partners).

8. To be involved, directly or indirectly, in the management or administration of contracts and other transactions with companies in which the collaborator has a financial interest, family/affective or social interests, directly or indirectly.
9. Employ, be involved in or unduly influence the recruitment, placement or promotion of immediate family or affective member;
 - l) Despite the indication of parents and friends for existing vacancies in the Company being an acceptable practice, always in vacancies without subordination, as per item 10 below, the area selecting or recruiting is responsible for deciding, according to the objective criteria and standards of the Company, and pressures to influence admission, promotion or dismissal of the parties involved are inadmissible.
10. Working with immediate family or affective members, under:
 - a) The same area and team (direct), and/or same supervision (same leadership, although in different areas);
 - b) In the same hierarchical line or chain of command (subordination);
 - c) Different areas and working with mutual support (direct) – such as areas that a part of an operational flow – and/or that can exercise recruitment/accountability/controls, with each other);
 - d) Despite not existing any direct or indirect hierarchical or command relationship, the affective relation could weaken internal controls of the Company and cause the loss of trust in one or both parties, or cause constraints to the Company.



11. Act, induce, through action or omission, including in decision-making, using the leadership position (vertical), management, reference, trust, bond or between members of a group (horizontal), with collaborators or other parties with a relationship with the Company to:

- a) Harm, misuse, impose the occurrence of certain action or omission or hinder the full development of the activities of the Company's interest;
 - b) Benefit, protect, created differentiated conditions, in an intentional manner, in order to permit or hinder certain action to occur and/or by means of omission – and being favorable to the individual interest of the other collaborator or supplier, in detriment to the interests of the Company;
- I- Collaborators occupying leadership positions or not, when called to take decisions in which the bond with other collaborators could harm or influence the assertive decision and considering the interests of the Company, must adopt positions of abstention and declare conflict of interest;

12. Unduly use assets of the Company, such as: financial resources, assets, privileged information, business opportunities of the Company for personal gains or third party gains, or for purposes contrary to the interests of the Company;

13. Not acting, keeping silent, adopting a passive positions, omissive, or any other decision to illegitimately favor a third-party, to the detriment of the interests of the Company;

The aforementioned situations of banned conflicts of interest are not definitive, and conflicts of different forms and aspects may arise, thus it is always necessary to question oneself:

“Am I following the best interests of the Company, and not my own personal interest, those of my family members, or any other interest?”

The occurrence of conflict of interest is irrespective of obtaining undue advantage, damage to Company assets, or receiving any advantage or gain from a public agent, private agent or third-parties.

i Attention

Conflict of interest must be declared, even in situations in which, at first sight, no improper or harmful act is produced by the activity or conflicting decision.

Communicate conflict of interest filling out the Company's Conflict of Interest Declaration Form, and forward it to compliance@petroreconcavo.com.br.

A suspected situation of conflict of interest, when not voluntarily declared, should be reported, by any party, at the Transparency Channel.

Access Conflict of Interest Guidelines.

Integrity Due Diligence

Integrity Due Diligence is a process with the purpose of assessing the nature and the extension of the risks involved, as well as verifying the integrity and reputation of the physical and juridical entity involved, with the aim of assisting the organization in specific decision-making in relation to transactions, projects, activities, recruitment, business partners and personnel.

Due Diligence is applied to the contracting processes of third-parties, suppliers, service providers, business partners, potential beneficiaries of donations and sponsorships, encompassing the Company's relationships with third-parties, considering peculiarities and importance in the business processes.

The area of Compliance performs Integrity Due Diligence and issues the report containing recommendations for deliberation by Management.

When not approved, based on reputation risk indicators, such suppliers, service providers, partners, sponsored parties and beneficiaries are blocked and deactivated from the base register. For future negotiations, the blocked parties will have to go through a new Integrity Due Diligence analysis.

The Integrity Due Diligence process is confidential and classified with access only to authorized personnel.

[Access Integrity Due Diligence Guidelines.](#)



Gifts, souvenirs and hospitality

Giving and receiving gifts, souvenirs, hospitality and advantages may, in some circumstances, produce claims or perceptions of the occurrence or attempt of bribery or undue advantage, as well as characterizing a situation of conflict of interest.

Souvenirs: considered as an item with a symbolic nature, used in the promotion of trademarks, propaganda, customary publicity or in the occasion of events or commemorative dates. With an irrelevant economic value, low marketing arrangement, distributed by companies or entities as a courtesy, in a non-personalized manner (not intended to exclusively award a particular person). Examples of souvenirs are: pens, pencils, rulers, t-shirts, caps, pendrives, keyrings, calendars, agendas, mugs, among other similar objects.

Gifts: considered as a good or service for personal use or consumption, not always with irrelevant or insignificant commercial value, without a commercial characteristic – distributed to a certain person or organizational unit, considered as acceptable by the Company in a maximum amount of R\$300,00 (three-hundred Brazilian reais), received in minimum interval of 12 months. Examples of gifts are, but not limited to: flowers, chocolate boxes, special pens, baskets (breakfast, Christmas, etc.), alcoholic beverages, handbags, shoes, accessories, barbecue kits, etc.

Courtesy: free exclusive tickets to entertainment events, parties, sports events, parties, shows, concerts, pleasure trips, among others.

Hospitality: comprises the offer of services or expenses with transportation, travel (by air, sea and/or land), meals, accommodation, courses, seminars, congresses, events, fairs, related or not to entertainment events.

Travel and accommodation related to events of interest to the Company, must be paid, when possible, through a registered tourism agency, avoiding direct payment to the collaborator, in compliance with the Company's travel policy.





The following conducts are not acceptable:

- **To receive souvenirs, gifts, hospitality and courtesies**, cash, goods and/or services, through direct transfer or by electronic means, directly or indirectly (through immediate family or affective members), or a personal characteristic, that could affect decisions, facilitate or benefit business, or, that could even be characterized as the practice of bribery, exchange of favors;
- **Receive souvenirs and/or gifts in amounts exceeding R\$ 300.00 (three-hundred Brazilian reais)**, even when fractioned, but which when repeated and accumulated surpasses this amount, in observation with the minimum interval of 12 months;
- **Receive gifts, hospitality and courtesy** with the exclusive purpose of offering tours, tourism and leisure;
- **Receive all and any pure and simple courtesy**, unrelated to corporate or institutional events, which do not reflect the interest of the Company in its business practice;
- **Sponsored travel expenses** with immediate family or affective members of the collaborator;

Attention

The receipt of any gifts, hospitality, courtesies, rewards, invitations, etc. must be communicated to the area of Compliance by filling out the Company's Souvenir, gift and hospitality form and forwarding the form to compliance@petroreconcavo.com.br.

The receipt of souvenirs does not need to be communicated, unless the established requirements are not met.

Access [Guidelines on Gifts, Souvenirs and Hospitality](#).

Right to privacy

The Company respects the right to privacy of its collaborators and commits to protect the intimacy, honor and image of its collaborators when handling personal information, as well as respecting the personal communication in the internet or other means of communication.

Collaborators commit to use in a responsible manner the means of communication, technological systems and, in general, any other means available, in compliance with the internal standards and criteria established for such purpose.

Attention

- The means of communication and systems are not supplied for personal, non-professional, use and, therefore, are not adequate for private communication. Accordingly, these means do not generate rights or expected rights to privacy, should they need to be supervised or monitored by the Company in the proportional performance of its activities of control and prevention of illegalities and inadequate conducts.



Personal data protection

The Company, when processing personal data, respects all fundamental rights and observes freedom and the principles recognized by the Brazilian General Data Protection Act ("LGPD"), the safety and management standards of the personal data of its collaborators and is available to contribute with the Brazilian Data Protection Authority ("ANPD").

The Company fulfills all the legal provisions in terms of personal data protection, preserving the data from undue disclosure, or disclosure outside provisioned legal or contractual purposes.

Collaborators who, in the development of their activities, access data of a personal nature must ensure the fulfillment of all requires established under the legislation and Personal Data Protection Policy, maintaining the confidentiality of such data.

Information on the processing of personal data, alteration of permission, among others, should be addressed to the Data Privacy area using the email privacidade@petroreconcavo.com.br.

Access a [Access the Company's Personal Data Protection Policy](#).



Information Security

Collaborators must guarantee the integrity, confidentiality and availability of data, in relation to the adequate use of equipment, technological apps and tools, in order not to compromise features and protection of systems that support the activities and business of the Company.



The following conducts are not acceptable:

- **The use of technological resources**, such as e-mails, apps, publication of texts or messages in official channels to send threatening or insulting contents, use of disrespectful language, express inadequate comments, fake news, that could offend physical or legal entities, a/or damage the image of the Company;
- **Acting and/or collaborating towards leaking** (any undue and/or unauthorized sharing) of information considered as privileged, confidential, trade secrets, documents, internal reports or registers of ownership of the Company;
- **Browse websites** with improper or offensive contents;
- **The sharing of access passwords** – the password is individual, personal and non-transferable and must, accordingly, be maintained confidential, and the collaborator is made responsible for any transaction made during its use;
- **Permit third-parties to use/access** equipment, systems, apps, using the password of the collaborator without prior authorization from the leadership;
- **Promote, in any manner**, the weakening of the cybernetic protection systems, altering and/or manipulating the installed settings, in a non-recommended manner and without authorization.

Access the Company's Information Security Policies.

Donations and sponsorships

Actions involving donations and sponsorships must follow the Company's guidelines of socio-environmental responsibility, in compliance with the pre-established fronts of action.

The requests go through the Integrity Due Diligence in relation to the potential beneficiaries (including, in such analysis, their leaders and counselor) and the report issued by the Compliance area is considered by Management.

Donations and sponsorships are formalized through a contractual instrument, containing the justifications of the project, including obligations of the beneficiary regarding the non-use of resources in a manner conflicting with legal provisions, mainly, but not limited to, those included under Anti-Corruption Law (Law 12846/2013), as well as Company's integrity guidelines, policies and Integrity Program.

Values designated as donations and sponsorships are included in the budget of the Company and approved annually by the Executive Committee. These amounts are duly registered in the accounting registers of the Company, through specific and self-explanatory entries of the expended funds. In the case of cash donations and sponsorships the deposits must be made in a national bank account, held by the beneficiaries, observing the terms of the prevailing legislation and the Guideline for Prevention against Money Laundering, Counter-Financing of Terrorism and Proliferation of Weapons of Mass Destruction Financing.



The following conducts are not acceptable:

donations, sponsorships or whatever kind of contribution, in any amounts, or the offer or provision of any service, loan concession or even assignment of assets are unacceptable in the case of:

- **Politicians;**
- **Trade Unions;**
- **Public Agents;**
- **Governmental Entities;**
- **Politically exposed individuals;**
- **Directly or indirectly benefit collaborators** observing the rules related to conflict of interests contained in the Company's Code of Ethics and Conduct;
- **Donations, sponsorships or any kind of contribution**, in any amounts, are forbidden to those with any background of violation to the Anti-Corruption Law;
- **Profit-making organizations;**
- **Organizations that** are tax-exempt;
- **Organizations or projects** with documentation that is not in accordance with the prevailing legislation or presenting restrictions;
- **Entities that meet the requirements of the Policy for Donations and Sponsorships**, but are being investigated in civil or criminal proceedings (the entity and/or its shareholders and/or management);



- **Organizations with objectives that are not compatible** with the Mission, Vision and Values of the Company, and that do not meet the requirements under the Code of Ethics and Conduct, integrity guidelines and Policies of the Company;
- **Payments of donations and sponsorships** shall not be made in foreign currency, or in cash or to third-party bank accounts, physical or legal entities, that are not beneficiaries; considered as a suspicious conduct, in accordance with the Guideline for Prevention against Money Laundering, Counter-Financing of Terrorism and Proliferation of Weapons of Mass Destruction Financing;
- **Donations, sponsorships and any kind of contribution**, in whatever amount, offered, promised or granted with the purpose of obtaining improper advantage or influence the action of any individual, whether a public agent, supplier, third-party, or other.

Access the Company's Policy for Donations and Sponsorships.



Contracting suppliers and relationship with suppliers and third-parties

The contracting of suppliers and third-parties is based on our Mission, Vision and Values, Ethical Principles, observing technical criteria, conducted through predetermined objective processes, such as bidding or price quotations, guaranteeing the quality of the services, best cost-benefit relation, and considering the requirements and specificities of the business.

The relationship with suppliers and third-parties must be respectful, cordial, transparent, and the contractual relations must comprise commitment with the law, prevention and combat against corruption, fraud and bribery, adequate treatment of personal data, as well as including specific clauses, in accordance with the business performed, whereby the parties commit to respect, comply with and enforce, where applicable, the Company's Code of Ethics and Conduct and the Integrity Program.



The following conducts are not acceptable:

- Unfair competition, forced labor or in degrading conditions, child labor, sexual abuse and exploration of children and teenagers, as well as, any physical, sexual, moral or psychological violence or other practices against the Law or the Company's Values and Ethical Principles;
- Negotiations which could result in obtaining undue advantages or personal benefits, for the individual or third-parties, characterizing conflict of interest, according to the provisions of the Company's Code of Ethics and Conduct, Integrity Program and guidelines;
- Provide remunerated services and/or favors to suppliers and third-parties with whom there is a relationship due to activities performed in the Company;
- Accept and/or offer commission and/or gratification for a contract, conclusion of a business or other modality involving procurement and services of the Company's interest;
- Accept and/or offer souvenirs, gifts, hospitality and courtesies outside the limit permitted in the Company's Code of Ethics and Conduct and Guidelines on Gifts, Souvenirs and Hospitality.

Procurement and contracts must be in accordance with the Manual for Third-Party Contracting and Management.

Relationship with political parties, trade unions and associations

The Company does not finance political parties, trade unions or association in Brazil or abroad, their representatives or candidates, neither does the Company sponsor congresses or events with the exclusive purpose of political propaganda, and abstains from taking any public stands.



The following conducts are not acceptable:

- Support the participation in political campaigns or activities using the name of the Company;
- Use any of the facilities, material and equipment of the Company to support political parties or the election of candidates, distribution of pamphlets, adhesives, placement of banners, or any other form of manifestation related to a political party;

The collaborator who wishes to participate of political processes – elections, should be careful that the image of the Company is not associated to the publicities and immediately inform the Company's area of Compliance, using the form Declaration of External Activities Form forwarded to compliance@petroreconcavo.com.br

Relationship with public authorities

The Company maintains relationships with public authorities (governmental entities, control bodies, regulatory agencies, among other), through civil servants, using the principles of Public Administration and trust, professionalism, collaboration, reciprocity, political independence and good faith, in accordance with the law, the Company's Code of Ethics and Conduct, integrity guidelines, policies and other internal standards.

For the performance of its activities, the Company must obtain licenses, permits and authorizations for different governmental bodies and entities, observing the adoption of the practice of prevention of risks of corruption, with the aim of preserving the integrity value.

For working with public agents and governmental entities, inside or outside the facilities of the Company, either in person and/or virtually, the collaborator must:

- I) Behave with integrity and in a transparent manner, with cordiality, conducted in accordance with the legislation and the Company's Code of Ethics and Conduct, integrity guidelines and policies, other internal standards of the Company, as well as with the professional codes of ethics guiding the conduct of public agents;
- II) Attend to possible requests for information from governmental authority and civil servants, diligently and with transparency, informing leadership, collaborating dutifully, in the processes of inspection or investigation by the authorities;
- III) Make it clear that the commercial transactions of the Company shall be carried out within market conditions and in accordance with legal and regulatory requirements, without the application of any abnormally advantageous commercial conditions;

- IV) Resist against and report any kind of insinuation, pressure and/or retaliation received, from public agents, third-parties and/or other collaborators of the Company, with the purpose of providing any undue advantages to any of the parties, or leading to the practice of any anti-ethical or illegal act, or in disagreement with the Company's Code of Ethics and Conduct, integrity guidelines and policies of the Company. Should this occur, individuals must promptly report the fact through the Transparency Channel.

When communicating with the public agent, the collaborator must always observe transparency and ethics, in order to:

- I) Communicate in an effective, appropriate and efficient manner with the various instances of government, in order to promote the necessary confluence with the interests and objectives of the Company and of the Governmental Authority;
- II) Act in a precise and comprehensive manner, registering and documenting all the communication with public authorities. Communication with public authorities should occur:
 - (a) Exclusively through official channel of the governmental authority and of the Company, such as: functional electronic address of the civil servant, telephone of the public agencies and correspondence with letterhead and numeration of the governmental agency;
 - (b) Exclusively through corporate devices made available by the Company. These being: e-mails, functional telephones and official correspondence.

When meeting with the public agent, the collaborator shall:

- I) Associate the meeting to the Outlook agenda, for collaborators with access to computers, issue of invitation to the participants, in order to register physical or virtual meetings;
- II) These meetings shall always have the presence of, at least, two collaborator , or more, when possible;
- III) For strategic matters to the Company, minutes of the meeting are issued, containing at least: name of the participants, agenda, deliberations, date and collection of signatures;
 - (a) The area of Compliance may, at any time, request the minutes of meetings, for awareness of the content of the meeting, as well as evidence of conformity to the Code of Ethics and Conduct.

When recognizing, in accordance with the interests of the Company, the need for travel/transport of the public agent, the collaborator must:

- I) Consider possible costs of accommodation or displacement of public agents, always when:
 - (a) The effective need is evidenced for the performance of a certain activity within the law and interests of the governmental entity, in order to fulfill its purpose;
 - (b) The limits imposed by the Company's Code of Ethics and Conduct, Guidelines on Gifts, Souvenirs and Hospitality, in the chapter related to "receiving and offering hospitality", item V, and Company's Travel Policy, observing, also, the code of ethics of the respective public entity to which the agent is subordinated, so that the values are proportionate and compatible with the accommodation/ displacement, in order not to be considered as undue advantagea;

- (c) Have the express approval of the Director of the area, in accordance with the recommendations of the integrity report, issued by the area of Compliance;

The Company shall fulfill resolutions, administrative or judicial resolutions, reserving the right to, observing the principle of good faith, contradictory and ample defense, question these, in the form provisioned in law and regulations, as the case may be.

Any relationships with the public authorities, through public and/or political agents, and/or politically exposed individuals, that do not observe these requirements, must be reported through the Transparency Channel.

Access the Company's Anti-Corruption Guidelines.



Relationship with surrounding communities of the company's operations

The Company establishes a relationship of respect towards the communities and local cultures, considering the social groups involved in our operation, in order to identify their expectations and needs, with the aim of implementing actions guided towards the exercise of citizenship and local development, mitigating environmental, social and cultural impacts, by means of actions of Sustainability and Socio-Environmental Responsibility.

Collaborators and suppliers must, in their routine activities in the field and interaction with the communities, render a treatment of respect, using Laws, Values and Ethical Principles of the Code.

The Company has open and permanent channels of communication by means of the following:
comunidades.ba@petroreconcavo.com.br (Bahia) and
comunidades.rn@petroreconcavo.com.br (Rio Grande do Norte).



The following conducts are not acceptable:

- The establishment of voluntary agreements with communities, through their leaderships and associations, or their representatives, without observing the Laws, the Company's Code of Ethics and Conduct, integrity guidelines, and other internal standards, or even, without the awareness and formal authorization of Management;

The relationship with the communities, through collaborators and/or suppliers, in the exercise of its activities, that do not observe these requirements, must be reported by means of the Transparency Channel.

Relationship with shareholders

The relationship of the Company practiced with its shareholders, investors and the market is based on transparency, timeliness and equality, in the fulfillment of its legal and institutional role, in order to establish a bond of trust and responsibility with the stakeholders.

The Company ensures an open dialogue and the disclosure of reliable information, consolidating the transparency of developed and implemented corporate activities.

Relations and communication with investors and financial analysts shall be conducted by the responsible area - Investor Relations of the Company.

Access the Company's Policy for the Disclosure of Relevant Act or Fact.

Relationship with society

The Company operates in the oil and gas segment, committed to the ideals of respect to human rights, democracy, citizenship, to develop and expand its activities in a responsible manner, in line with public interests, preventing and combating fraud, illegalities, embezzlement and the practice of corruption.

Anyone may communicate any violation or suspicion of violation to the Laws, the Company's Code of Ethics and Conduct, integrity guidelines and policies, as well as to the Company's Integrity Program, by means of the Transparency Channel.



Register of operations, financial and accounting information

Registers in the accounting books are made and reported in accordance with the accounting standards applicable in Brazil and with the International Financial Reporting Standards ("IFRS"). Financial records are made with integrity and precision.

The process for performing the above-mentioned registers must follow the Company's internal control system. Records and financial and accounting information must be maintained and preserved in accordance with the applicable laws and policies regarding the safeguarding of such registers, and available for auditing and internal and external assessment. Any record, potentially relevant in the case of infringement of the law or for any pending litigation or investigation, must not be destroyed.

The Company's accountant is responsible for the closing of the accounting registers.

All collaborators, becoming aware of any omission, fraud or misstatement in the accounting and financial registers, or in the information that substantiate such registers, or in other communication, or any violation to internal controls, must report such information on the [Transparency Channel](#).



Institutional relations, communication, spokespersons and press

Institutional relations are performed by the Company, observing the criteria of clear, opportune, reliable information, safeguarding sensitive, privileged information and industrial trade secrets, according to the interests of the Company.

Spokespersons of the Company are Directors and/or those formally assigned to talk in the name of the Company.

In the Company's website there is a channel for institutional communication, for requests for information and relationship with the press.



The following conducts are not acceptable:

- It is not permitted that unauthorized collaborators speak in the name of the Company, disclose information, documents, or represent the Company without formal authorization;

Image and reputation protection

It is the duty and responsibility of all collaborators to protect the image and reputation of the Company, its trademark, the use of its resources and assets, acting in a presential or remote manner, physical and/or digital means, in any location of activity, even outside working hours.



The following conducts are not acceptable:

- Harmful acts to the image and reputation of the Company, to the image or honor of its collaborators, through any kind and means of communication, including social media, such as the production or dissemination of fake news, unascertained images or facts;

Use of social medias, participation and sharing

The Company is present in the social networks with the purpose of interacting with the public, being connected to share and expand knowledge and experiences, as well as strengthening relationships.

The participation, collaboration, creation, association of collaborators in social networks, forums or blogs in the internet and opinions or declarations made through these means, must be issued in a non-anonymous and personal manner.



The following conducts are not acceptable:

- Adoption of inadequate behaviors causing constraints to the image and honor of the Company and its collaborators;
- Publications of a biased, discriminating, defamatory nature, containing or stimulating pornographic contents, or which constitute the practice of felonies or crimes;
- Unauthorized disclosure of collaborators, work routines, physical installations, sensitive personal data, confidential information.

Access the Company's [Social Media Guidelines](#).

Use of assets, equipment and benefits

Each collaborator is responsible for the protection of any allocated resources for the development of activities, and has the duty of promptly informing leadership in relation to any threats or harmful events to the Company.

The Company reserves the right to impede the distorted use of its assets, equipment, benefits and infrastructure through the use of systems, reports, controls, inspections and audits, notwithstanding referring to the competent authorities, misuse and illegal practices contributing to damage, loss, exposure and negative reputation.

The collaborator must:

- Work diligently to protect the assets of the Company, by means of a responsible behavior in line with the Company's Code of Ethics and Conduct, integrity guidelines, policies and other internal standards;
- Make use of tools, machinery, equipment and other material and immaterial resources of the Company in an adequate, careful, rational and sustainable manner for the exclusive purposes of the work, avoiding and combating any form of misuse and wastefulness;
- Avoid the undue use of assets of the Company that could cause damage or reduce efficiency, or in any other case, contrary to the interests of the Company.

Violations, disciplinary measures and communication to public authorities

All the stakeholders of the Company may communicate any violation or suspected violation to the Laws, Code of Ethics and Conduct, Integrity Guidelines and internal policies at the Transparency Channel.

Violations and reports are assessed, then investigated, and when the practice of an illegal, anti-ethical act, or an act in disagreement with the internal standards of the Company is identified, this could entail disciplinary measures, penalties, even a justified dismissal of the collaborator, and contractual rescission in the case of suppliers and service providers. All cases are subject to administrative, civil and penal sanctions, under the terms of the respective legislation.

The body responsible for the recommendation of ethical sanctions is the Ethics Committee of the Company, which reports to the Executive Committee.

Acts and/or suspicion of fraud, corruption, misconduct, harmful acts to Public Administration, shall be spontaneously communicated to the competent authorities in order to collaborate and cooperate with possible investigations, as a means of reinforcing the commitment of the Company to combat corruption through its compliance mechanisms of prevention, detection and response to illegalities



Transparency Channel

It is the duty and responsibility of all collaborators, or of whomsoever becomes aware, to communicate any violation or suspected violation of the Laws, the Company's Code of Ethics and Conduct, Integrity Guidelines, Policies, and Integrity Program.

The Transparency Channel is external and independent, managed by the company Contato Seguro. Reports may be anonymous or identified, assuring the protection of the complainant made in good faith and non-retaliation.

Reports and communication of violations must be made through the Transparency Channel, available on the intranet and internet, at:



Transparency Channel

Help us to follow the path of ethics and integrity

CALL OR ACCESS

 **0800 515 2215**

 contatoseguro.com.br/petroreconcavo

 canaltransparencia@contatoseguro.com.br

 **CONFIDENTIAL | 100% DISCRETION | 24h PER DAY**

 

Mandatory periodical training

The training of the Company's Code of Ethics and Conduct, as well as of other integrity guidelines and policies, are mandatory and must be carried out by all collaborators, within the stipulated terms.

Refusal to participate in the training is considered as an ethical infraction subject to disciplinary measures.

Acceptance

Acceptance of the Company's Code of Ethics and Conduct is mandatory, either physically or virtually. Confirmation of acceptance is by means of the signature.

Management must sign the instrument of consent in relation to the Company's Code of Ethics and Conduct on the act of taking office.

PetroReconcavo ("Company") collaborators (management, executives, employees and trainees) accept the rules established in the Code of Ethics and Conduct.

Suppliers, third-parties, service providers of PetroReconcavo ("Company"), accept the rules of engagement established in the Code of Ethics and Conduct, as applicable to them.

In the labor and service contracts there must be a clause with the express obligation of obedience to the Company's Code of Ethics and Conduct.

General provisions and approval

The Company's Code of Ethics and Conduct shall be mandatorily reviewed at each two year cycle, or at any time, at the interest of the Company, due to changes in the legislation, as well as for suggestions and proposals made in order to promote improvement to the culture and promote Integrity Value.

Cases not covered by the Company's Code of Ethics and Conduct, should be interpreted in accordance with the Anti-corruption Law 12846/13 and Decree 11129/22, the Brazilian Penal Code; the Administrative Improbability Law (Federal Law 8492/1992); the Anti-Money laundering Act (Federal Law 9613/1998); the Public Procurement Law (Federal Law 14133/21); Law for the Prevention and Repression against any Violation to the Economic Order (Federal Law 8884/1994 and Federal Law 12529/2011); the North American Foreign Corrupt Practices Act (FCPA) and the United Kingdom Bribery Act (UKBA), the law on Conflicts of Interest 12813/13, and standards applicable to the CVM regulation, the New Market Regulation, the Company's By-laws, integrity guidelines and policies of the Integrity Program and internal rules, when applicable.

Alterations to the Company's Code of Ethics and Conduct is of exclusive responsibility of the Executive Committee of the Company.

Approved on 09/29/2022
PetroReconcavo
Executive Committee



Signature

Sign digitally here



Collaborators

I, collaborator of PetroReconcavo ("Company"), hereby accept the rules established in the Company's Code of Ethics and Conduct:

Full name:

CPF:

Registration:

Date: / /



Signature

Sign digitally here



Suppliers

I, service provider of PetroReconcavo ("Company"), hereby accept the rules established in the Company's Code of Ethics and Conduct, as applicable:

Full name:

CPF:

Company:

Position:

Date: / /



