

A green-tinted photograph of hands holding small plants in soil, with decorative white and yellow lines. The image is a close-up of several hands, some of which are holding small, green seedlings in soil. The overall color palette is dominated by various shades of green, with a warm, golden-yellow glow at the bottom. Overlaid on the image are several thin, white and yellow lines that curve and loop across the frame, adding a modern, graphic design element.

# PetroReconcavo Integrity Program

**Biennial 2022 – 2024**





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## Institucional



### 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.

## Message from the Executive Committee

### Integrity as a value

Every single daily decision made in life corroborate the success or decline of the activities which one wants to impact. Making reliable, transparent and secure decisions is the path of success we want to follow together.

We present the PetroReconcavo Integrity Program to support us in this path, whose main objective is to give effectiveness, existence and quality to our integrity value, with unequivocal positioning that making ethical decisions should guide our daily lives.

We want to be linked to an admired and respected Company whose positive reputation lies in welfare promotion as one of the requirements for business success.

Walk with us.

**Eduardo Cintra Santos**

*Chairman of the Board of Directors of PetroReconcavo*

## Introduction

PetroReconcavo (“Company”) is an independent operator focused on mature onshore fields in Brazil. With a respected reputation with customers, regulatory agencies, suppliers and employees, high-performance and extensive experience in the sector.

The Company plays a fundamental role in promoting economic development in the country, through its core business operations, and also by corroborating towards improving best government practices and transparency in the business.

In compliance with the legal requirements for preventing and countering corruption contained under Law 12.2013 (Anti-corruption Law), Regulatory Decree 11129/2022, CGU (Federal Inspector General Office) Ordinance 909/2015, as well as international anti-bribery and corruption laws, PetroReconcavo releases its Integrity Program, approved by the Executive Committee, evidencing commitment towards the fight against and non-acceptance of corruption and illicit acts practiced against the government, along with anti-ethical practices that could adversely affect internal environment, its reputation and image in Brazil and abroad, in the combat against foreign bribery.



### Decree 11129/2022 provisioned under article 56 what the Integrity Program is about:

The integrity program consists, within the framework of a legal entity, in the set of internal mechanisms and procedures of integrity, audit and promotion of the notification of irregularities and effective application of codes of ethics and conduct, policies and guidelines, with the purpose of:

1. Preventing, detecting and rectifying embezzlement, fraud, irregularities and illicit acts committed against the public administration, national or foreign; and.
2. Foster and maintain a culture of integrity in the organizational environment.

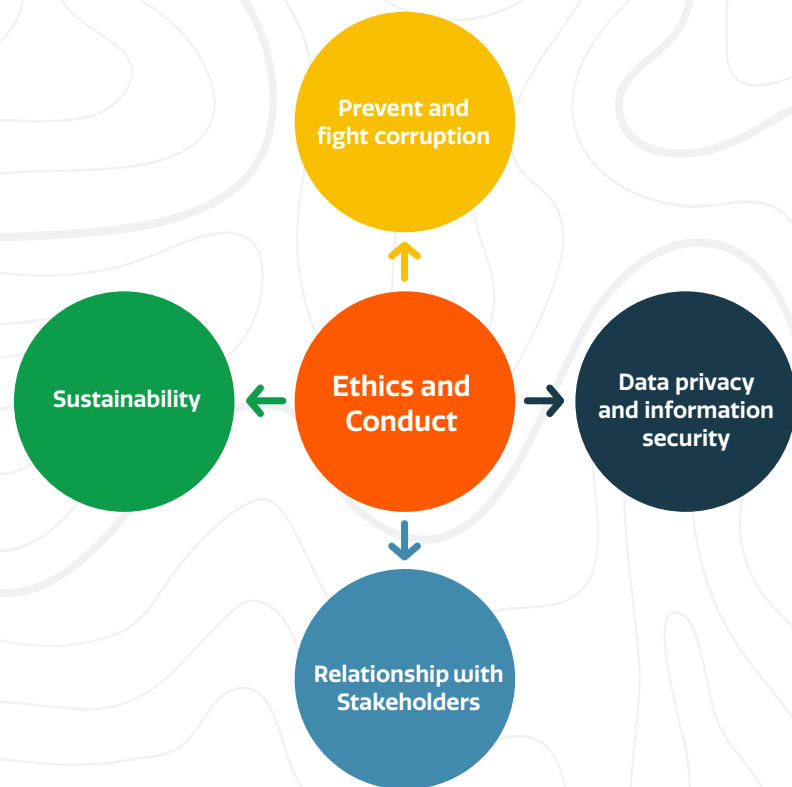
**Sole paragraph.** The integrity program should be structured, applied and updated according to prevailing characteristics and risks of the activity of each legal entity, which, in turn, should ensure constant improvement and adaptation of such program, in order to ensure its effectiveness.”

**The Company reinforces through the Program, its willingness to become a reference in integrity, transparency and ethics in the business in which it is a related party, allocating resources and collaborating towards the full implementation, existence and application of the requirements provisioned under the Decree.**

Approved program on 09/29/2022  
PetroReconcavo Executive Committee

## The PetroReconcavo integrity program

Refers to the set of continuous actions that group the Code of Ethics and Conduct, integrity guidelines, policies and procedures, with the aim of strengthening its culture through the prevention of and fight against corruption, data privacy and information security, relationship with stakeholders and sustainability, which aim to provide support for the Company's performance, in the various risks considered.



Aligned with its Vision, Mission and Values, the Company aims, on a long-term, to develop with its employees a safe, transparent relationship, granting independence, assisting in decision making and increasing organizational trust, creating and protecting value.

The Integrity Program becomes a part of the Company's routine in the measure in which it acts in an integrated manner with the areas and employees, by means of the care for integrity value, corroborated through effective communication and training. This occurs by means of the exercise of preventive, detection and restrictive tasks, with the support of senior management.





## Attributes, Pillars and Culture

### Program Structure > fulfillment of the requirements (Attributes)

“How it is carried out”



#### Existence

In relation to the presence, within the Company, of each element comprising the dimensions;



#### Quality

In relation to its appropriateness, in accordance with best practices;



#### Effectiveness

In relation to its effective performance.

### Systemic view > Accompanies the dynamics of the Company >

#### Feedback (Pillars)

“How it works and is it suitable to the requirements of the Company”



#### Prevention

Establishment of clear instruction for business conduct;



#### Detection

Monitoring of business activities;



#### Response

Clear and straightforward response to violations, implementation of ongoing improvements

### Culture

“How the Program functions in the routine of the Employees”

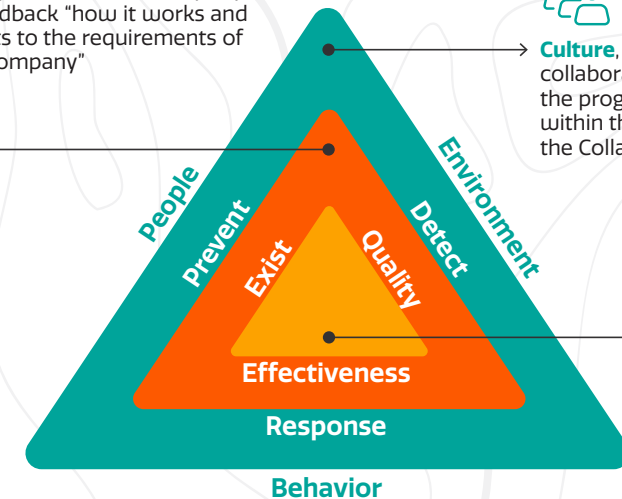
In view of the intangible aspects of culture, the Program must **impact people**, influence behaviors and change the environment, **bringing collaboration**.



**Systemic View** > accompanies the dynamics of the Company – Feedback “how it works and adapts to the requirements of the Company”



**Culture**, people, collaboration “how the program prevails within the routine of the Collaborators”



**Program Structure** – fulfill requirements “how this is carried out”

## Dimensions

### 1. Development of the Integrity Program Management Environment

- I) Commitment from Senior Management of the legal entity, including Executive Committee, evidenced by the visible and evident support to the Program, as well as the allocation of adequate resources;
- II) Independence, structure and authority of the internal body responsible for the application of the Integrity Program and monitoring of its compliance;
  - (a) The area of Compliance, its autonomy and prerogatives;

### 2. Periodic Risk Analysis

- I) Analysis of the risk profile of the Company required for structuring the Integrity Program;
  - (a) The assessment should contemplate risks specifically related to integrity;
  - (b) Adequate risk management, including periodic analysis and reassessment, for implementing necessary adaptations to the Integrity Program and efficient allocation of resources;

### 3. Structuring and Implementation of Policies and Procedures

- I) Conduct standards and Code of Ethics and Conduct applicable to all employees and management, independently of position or function performed;
- II) Guidelines, Policies and Procedures of Integrity applicable to all employees and management, independently of position or function performed;
  - (a) Anti-corruption guideline;
  - (b) Anti-money laundering, counter financing of terrorism and Prevention of Proliferation of Weapon of Mass Destruction Financing;
  - (c) Conflict of interest guideline ;
  - (d) Integrity Due-Diligence Guideline ;
  - (e) Souvenir, Gift and Hospitality Guideline ;
  - (f) Diversity and Inclusion Policy;
  - (g) Donation and Sponsorship Policies;
  - (h) Data Protection Policy;
  - (i) Information Security Policy ;
- III) Accounting registers and controls assuring the prompt preparation and reliability of financial reports of the legal entity;
  - (a) Effective internal controls of the Company ;
  - (b) Internal Audit Report through periodic assessments;

**IV) Due diligence, based on risk, for;**

- (a) Hiring and, as the case may be, third-party supervision, such as suppliers, service providers, intermediate agents, brokers, consultants, commercial agents and associated parties;
- (b) Hiring of, and according to the case, supervision of politically exposed people, as well as their family members, close collaborators and participating legal entities;
- (c) Performance and supervision of sponsorships and donations;

**V) Verifications, during fusions, acquisitions and other corporate operations, of any irregularities or illicit acts or the existence of weaknesses in the legal entities involved;**

**VI) Transparency Channel, an available tool for reporting irregularities, open and widely disclosed to employees;**

- (a) 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;

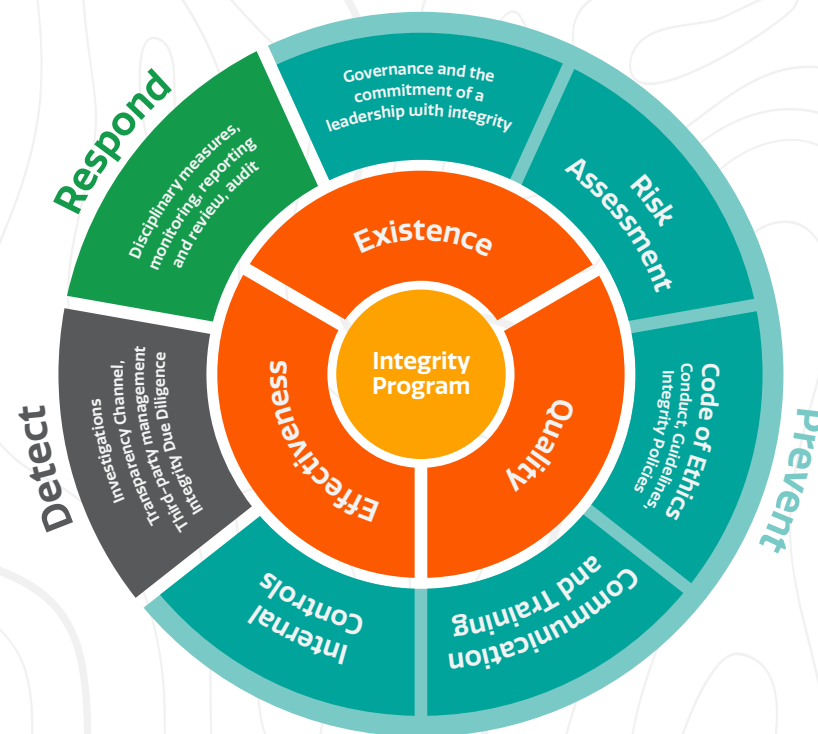
**VII) Decision-making process;**

**4. Communication and Training**

- I) Communication regarding the Program and mandatory periodical training;
- II) Transparency of the legal entity;

**5. Monitoring of the Program, mitigation measures and application of penalties**

- I) Ongoing monitoring of the Integrity Program, with the aim of improving prevention, detection and combating against the occurrence of detrimental acts, detrimental acts provisioned for under article 5 of Law 12846, of 2013;
- II) Procedures assuring immediate interruption of detected irregularities or violations and the timely remediation of damages incurred;
- III) Application of disciplinary measures in the case of violation of the Integrity Program, through;
  - (a) The Ethics Committee ;
    - Bylaws of the Ethics Committee.

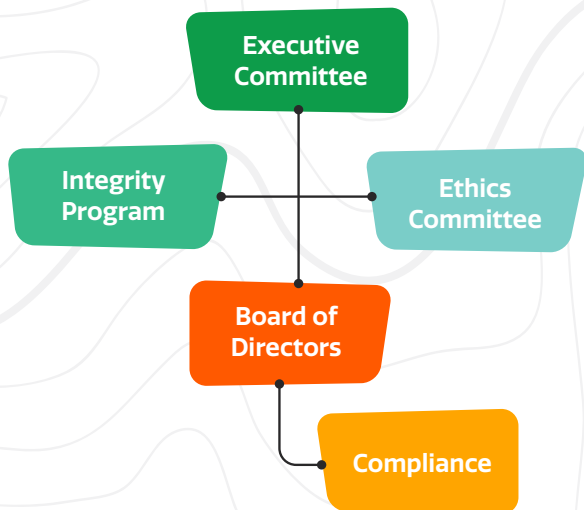


## Instance, applicability and responsibilities

The Integrity Program is a commitment approved by the Executive Committee. The Board of Directors, the Ethics Committee and the area of Compliance are governance bodies for supporting, advising and implementation of the Program, as well as for its execution and enforceability of its prerogatives.

The Program Dimensions, in accordance with Decree 11129/22, are applied to management, workforce (executives, employees and trainees), subsidiaries, the whole Company, as well as third-parties, suppliers, clients, business associates, where applicable, in Brazil or abroad.

Responsibilities, as defined in the Responsibility Matrix of the Integrity Program, do not create different treatment to collaborators, whereby they are subject on an equal basis to the Program, as well as to disciplinary measures.



## 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.**



## 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](https://contatoseguro.com.br/petroreconcavo)

 [canaltransparencia@contatoseguro.com.br](mailto:canaltransparencia@contatoseguro.com.br)

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