

# OUR CODE OF **ETHICAL CONDUCT**

*Petrobras System*





*The Petrobras System reinforces its commitment to ethics and emphasizes the importance of its entire **workforce** acting in accordance with ethical principles, following the Petrobras' Values and its internal standards, and also abiding by the laws and regulations applicable to our business.*



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# 1.

## OUR CODE

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Petrobras and the companies in which the company holds direct or indirect equity interests (“Petrobras System” or “System”) play a key role for Brazil and society, operating in an integrated, specialized manner in the oil, natural gas and energy industries. The Petrobras System has a strong commitment to all involved parties, including the people who make up their **workforce**, the company, partners and shareholders. This commitment is expressed through our values, which guide all actions and decisions taken by the System.

The Petrobras System is a reference for its technical competence and continually works to improve products, services, technologies and processes, aligning ourselves with the challenges and demands that are constantly evolving. Aware of the prominent role we play in the Brazilian industry, we aim to positively influence the industrial and business environment in Brazil and in other countries where we operate, promoting ethical conduct in the markets where we are present and generating value for society and our **stakeholders**.

In this regard, much more than a regulatory document, this Code of Ethical Conduct also fulfills an educational and inspirational role, contributing to the dissemination of Petrobras’ corporate values and culture, with an internal focus and also with effects that, due to the company’s size and path, extend beyond the company’s walls. This document was prepared collaboratively, allowing our **workforce** members to contribute with suggestions to its content.

As a result, the wording presented here includes ethical conduct guidelines that direct us to experience our values in practice, inspiring us to act in accordance with our purpose and enabling us to act ethically in our daily activities. In addition, Senior Management and all other **leaders** of the System have the additional responsibility to promote the values and conduct standards established in this Code, serving as examples for their teams and ensuring consistency between their words and actions. Therefore, this document also highlights the additional responsibilities of people who hold management positions in the Petrobras System.

## Code of Ethical Conduct: a tool that guides, inspires and empowers

### TO WHOM IT APPLIES

The Code of Ethical Conduct of the Petrobras System applies to the entire **workforce** of Petrobras and that of the companies in the System. This includes:

- > the people who make up the Board of Directors and its advisory committees, the Audit Committee and the Executive Board.
- > any person who acts on behalf of the System or represents it, including employees, interns, young apprentices, and service providers.

### PERIODIC REVISION

The Code shall be regularly revised and updated, at least every two years, under the responsibility of Petrobras' Ethics Committee and of the Governance and Compliance area, with the Board of Directors' approval. Petrobras' Ethics Committee and **leaders** of the companies in the System must ensure the guidelines in this document are applied.

### ACKNOWLEDGEMENT INSTRUMENT

All Petrobras System **workforce** members must sign the Acknowledgement Term, stating they have read, understood and are committed to following the Code's standards. This instrument is updated with each revision of the document. This ensures that everyone is aware of the Petrobras System's ethical guidelines.





## LEARNING ABOUT OUR CODE

Petrobras offers regular training sessions for its **workforce**, including leaders, on the topics addressed in this Code. These training sessions are key to deepen knowledge on the subjects presented herein.



## HOW TO USE THE CODE

We must act in accordance with national and international legislation and commitments applicable to the Petrobras System's business and with its internal regulations. In addition, the guidelines of the Code of Ethical Conduct of the Petrobras System must be followed in all our activities.

*To better understand the Code and its application, it is important to be familiar with some **keywords** that are highlighted throughout the document. These words are defined in the **Glossary**, which can be consulted on page 23.*

However, there may encounter situations where this Code's guidelines are insufficient. In these cases, we must assess the impacts of our actions, ensuring they are aligned with Petrobras Values.

If you are unsure of the conduct to be adopted in a given situation, reflect:

- *Is my conduct consistent with Petrobras' values?*
- *Will I feel comfortable explaining that I acted correctly?*
- *Does my conduct serve as a good example for colleagues?*
- *Have I analyzed the risks and am I confident that the decision to be made is the best for the Petrobras System?*

If you answer positively to all of the questions above, there will be a strong indication that your conduct is in compliance and that you are contributing to strengthening ethics and integrity in the Petrobras System culture.

*Now, if you still have questions or concerns, see how you can proceed in the "**Responsible Communication**" section.*

*We are responsible for representing the image and reputation of the Petrobras System everywhere we go! Whenever you identify yourself as someone linked to the Petrobras System, it is important to apply the conduct commitments and guidelines established in this Code, including in the online environment.*

Any failure to comply with the Code may result in disciplinary measures or other consequences, in accordance with the laws and internal rules of Petrobras and the System's holdings. When evaluating possible disciplinary measures, the circumstances of the specific case, the professional history, and the severity of the action will be considered.

*In the case of non-compliance with the guidelines in this Code by service providers from contracted companies, it will be reported to their employing company.*

## 2. OUR VALUES

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*Petrobras' Values are the key principles that guide our actions and decisions.*



### **CARE FOR PEOPLE**

Taking care of people by promoting diversity, equality, and inclusion, health, well-being, and physical and psychological safety.



### **INTEGRITY**

Acting with ethic, transparency, and consistency between words and actions.



### **SUSTAINABILITY**

Creating value for the Company and stakeholders with a long-term vision and commitment to life, fair energy transition, the environment, and society.



### **INNOVATION**

Building new paths for the company, overcoming barriers with collaboration, technology, technical expertise, and continuous learning.



### **COMMITMENT TO PETROBRAS AND THE COUNTRY**

Working with excellence and purpose for the development of Petrobras and the country.

# 3.

## OUR RESPONSIBILITIES

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Petrobras Values are the essence of the topics and conducts addressed in this Code and permeate all areas of operation of the Petrobras System. Experiencing them, we seek to ensure that Petrobras and the companies in the System operate with integrity, sustainability, and a committed to caring for people, innovation, the company, and the country.

When we make choices, we are showing the result of the combination of our values. Our decisions reflect not only a specific value in each situation, but the interaction between them. Reflecting these values in our choices is representing the Petrobras System's way of being.

It is important that you reflect on each of the topics in this Code and be aware that you are applying our values in your daily life. By acting this way, you will show your commitment to Petrobras Values, contributing to strengthen ethics in the Petrobras System.







# 3.1

## LABOR RELATIONS AND HUMAN RIGHTS PROTECTION

We respect the internationally recognized human rights and value a dignified and inclusive **working environment**.



In the Petrobras System, our duty is to respect and promote human rights, as well as to prevent the risk of their violation in our projects and operations. This includes ensuring decent working conditions, a diverse, inclusive, safe, and healthy environment, respect for labor standards regarding working hours, freedom of association and unionization, **non-discrimination**, and the promotion of equal opportunities.



### WHY DOES THIS MATTER?

Personal relationships are influenced by historical and cultural factors, which can result in structural issues such as racism, sexism, xenophobia, ableism, homophobia, among other things, even if they are unintentional. Therefore, respecting Human Rights, recognizing diversity and promoting equality and inclusion are key actions to ensuring a dignified life for the people. This contributes to a **workplace** free from violence, where people can contribute, express themselves and live positive experiences.



### TO REFLECT UPON

- › Am I aware that our activities may generate risks of human rights violations?
- › Do I make jokes or statements that may offend others?
- › Do I show respect for the opinions, beliefs, and convictions of coworkers, even if they are different from my own?

› Am I promoting diversity and discouraging inappropriate behaviors in the workplace?

### ALSO READ\*:



- Human Resources Policy
- Diversity, Equality, and Inclusion Policy
- Petrobras' Social Responsibility Policy

\*The Policies are developed in the Petrobras System.



### 3.1.1 Our responsibilities

- Treating everyone with respect, regardless of their culture, race, skin color, ethnic or regional origin, social class, age, religion, sex, gender, sexual orientation, personal appearance, physical, sensory, intellectual, mental or psychological condition, marital status, opinion, political conviction, gender identity, gender expression, employment or company affiliation, or any other factor that differentiates people individually;
- Accepting diversity in all its forms and promote an inclusive, and equitable environment;
- Using **appropriate language** and adopt attitudes that are compatible with the **workplace**;
- Respecting **affirmative actions** promoted for underrepresented groups such as women, black people, indigenous people, people with disabilities, **LGBTQIAPN+** people, elderly citizens and migrants;

- Providing support to people who report being victims of violence in the workplace, encouraging them to seek help and report incidents;
- Respecting the workforce's right of association, unionization, and collective bargaining;
- Paying attention and taking measures to prevent violations of rights of individuals and communities, and also protect their cultural values and heritage, in all our activities and contractual relationships.



### 3.1.2 Inappropriate behavior

- Making discriminatory, prejudiced, or harassing comments; offensive, humiliating, or intimidating comments that violate the dignity and rights of other individuals or groups, also on digital channels or social media.
- Creating a hostile, exclusionary, or intimidating work environment.
- Engaging in, condoning, or refraining from taking action against aggressive behavior or physical, verbal or psychological violence, including **moral harassment** and **sexual violence**.
- Engaging in or neglecting situations of sexual exploitation of children and teens, child labor and forced, compulsory or slave-like labor, arising from our activities.



### 3.1.3 Leading by example

As a **leader**, you are also responsible for:

- Working to continually strengthen the organizational culture, serving as a positive example of the practical application of the company's values.
- Ensuring a humanized, respectful, welcoming, diverse, equitable, collaborative, and psychologically safe work environment, preventing **inappropriate behavior**.
- Diligently addressing reports of **inappropriate behavior** that come to your attention, providing proper treatment to reported cases.
- Encouraging collaborative work, constructive debate and different opinions.
- Ensuring equality, equal opportunities, and professional recognition based on performance, skills, and deliveries made, without allowing any other factor of individual differentiation to jeopardize such principles.

*To have a relationship with the Petrobras System, our counterparties must also abide by the Human Rights, ensure decent working conditions for the people, and fight aggressive behavior or violence, as well as degrading or slave-like work practices, human trafficking and child labor, demanding a similar stance from their suppliers and sub-suppliers. The System provides measures against counterparties that violate such rights, such as the application of administrative sanctions and early termination of agreements*





## 3.2

### HEALTH, WELL-BEING & SAFETY

We care about the health, well-being and safety of our **workforce**, with a total focus on people.



In the Petrobras System, we are committed to ensuring the health, well-being, and safety of our **workforce**, as well as the safety of all those who work in our facilities. For this, improving the integrity and reliability of facilities, as well as the processes and promoting well-being have been a constant pursuit within the System.



#### WHY DOES THIS MATTER?

Health, well-being, and safety are imperative in the **workplace**, as these aspects directly impact quality of life and professional performance. Being aware of risks, adopting preventive measures, and following occupational health and safety guidelines are key practices to avoid accidents and incidents that could harm people's health and physical and mental integrity.



#### TO REFLECT UPON

- › Am I balancing my personal and professional life?
- › Do I participate in trainings and actions to promote health, well-being, and safety?
- › Do I know what to do in an emergency?
- › In the incidents or accidents, is my focus only on identifying people to blame or on trying to understand the factors that determined the risks?



#### ALSO READ:

- Health, Safety & Environment Policy



#### 3.2.1 Our responsibilities

- Taking care of ourselves, of coworkers, relationships, and the **work environment**, and allow ourselves to be taken care of.
- Executing work activities only when you have the proper authorization and the necessary knowledge, skills, and abilities, signaling any impediments.
- Being familiar with and applying the procedures and use the necessary and appropriate protective equipment when performing work activities.
- Knowing how to proceed in emergencies and to immediately report all unsafe acts or conditions.
- Identifying, reporting, and controlling any risks and impacts to people's health and safety.
- Undergoing occupational medical tests and other health assessments when called upon and maintain a valid Occupational Health Certificate (ASO).



If you are experiencing situations of embarrassment, harassment, or violence in the workplace and need to be heard or supported by specialized professionals, contact the **Support Channel: 0800-287-2270** Available to Petrobras' workforce.



### 3.2.2 Inappropriate behavior

- Working or promoting work in unsafe conditions.
- Neglecting occupational health and safety standards, thereby endangering ourselves or others.
- Consuming alcoholic beverages or illegal substances during the workday or working under their influence.



### 3.2.3 Leading by example

As a **leader**, you are also responsible for:

- Promoting a **work environment** based on trust, which encourages autonomy with responsibility, and allowing the **workforce** to feel safe to express their opinions and concerns.
- Practicing active listening and open, transparent communication, encouraging the **workforce** to report risks, incidents, or unsafe conditions, as well as suggestions for improvements, promoting the development of integrated solutions.
- Ensuring the workforce's right to refuse to perform an action or comply with an order in cases of serious and imminent risk to life or physical integrity.
- Monitoring and offering support when health, well-being, and safety issues are perceived or brought to your attention, and referring them to specialized corporate services.

*To have a relationship with the Petrobras System, our business partners must also ensure the adoption of safe practices for all those involved in the business, in line with our values and ethical principles.*





## 3.3 SUSTAINABLE DEVELOPMENT

The choices we make today will ensure our future and that of future generations. That is why we conduct our business responsibly and balancing long-term value generation, business sustainability, commitment to life, environmental protection, and social well-being.



*In the Petrobras System, we are committed to social and environmental responsibility, acting preventively to identify and mitigate environmental risks. We also recognize the duty to repair losses resulting from damages caused under our responsibility to people or communities impacted by our activities, in a timely manner. Furthermore, we maintain transparent, timely communication with our stakeholders, promptly informing them of the occurrence of environmental damage, ensuring transparency in all our actions.*



### WHY DOES THIS MATTER?

By committing to protecting the environment, reducing our carbon footprint, using resources responsibly and promoting sustainability, we are contributing to preserving ecosystems, mitigating environmental impacts and ensuring the balance and sustainability of the planet.



### TO REFLECT UPON

- › Do I consider the potential environmental and social impacts in my work and projects?
- › Am I using water, energy and other resources consciously and responsibly?
- › Do I report any eventual environmental risks or risks to people's health and safety?



### ALSO READ:

- Health, Safety & Environment Policy



### 3.3.1 Our responsibilities

- Respecting all forms of life and the environment, preventing any damage and considering the potential negative impacts of our activities in the decision-making process, to minimize them.
- Acting transparently with communities potentially affected by our activities, maintaining ongoing and permanent communication channels.
- Using water, energy and materials in a conscious, responsible, and waste-free manner.
- Communicating or reporting any environmental risks or risks to people's health and safety in a promptly manner.
- Mitigating, reducing and collaborating in resolving possible negative impacts caused in the communities where we operate.
- Assessing opportunities for improvement in environmental and social aspects in the works, projects, and decision-making.



### 3.3.2 Inappropriate behavior

- Ignoring or disrespecting applicable environ-



mental legislation and internal standards related to the activities performed within the Petrobras System or at its service.

- Concealing, lying or altering information regarding the true impacts of a particular project or activity on the environment and on society.



### 3.3.3 Leading by example

As a **leader**, you are also responsible for:

- Encouraging good practices and initiatives that seek to preserve natural resources, generate positive impacts, promote decarbonization, and foster socio-environmental development.
- Evaluating and managing environmental and social impacts in the context of a fair energy transition, ensuring that there are no negative impacts or injustices for workers, suppliers, and related communities.

*We encourage our suppliers, business partners, and other counterparties to contribute to the Petrobras System in promoting a sustainable future, adopting best social and environmental practices in their activities.*





## 3.4

### RELATIONSHIP WITH STAKEHOLDERS

We value transparent, proactive and continuous communication with our various **stakeholders**.



*In the Petrobras System, we have the duty to communicate clearly, objectively and transparently, through respectful conversation in our relationships with the workforce, customers, suppliers, government agencies, communities in the areas we cover, investors, business partners, the media, professional associations and other stakeholders. In addition, we commit to not providing support or contributions to political parties campaigns or candidates for elected positions.*



#### WHY DOES THIS MATTER?

An ethical, transparent relationship with our **stakeholders** promotes trust and credibility in our interactions. This strengthens our institutional reputation, fosters solid partnerships and creates an environment conducive to the mutual development of the involved parties.



#### TO REFLECT UPON

- › Am I aware that my actions may reflect on the Petrobras System's image and reputation?
- › Am I speaking or making commitments on behalf of the Petrobras System with the proper consent?
- › Am I promoting a friendly, impartial conversation with our **stakeholders**?

#### ALSO READ:



- Communication & Relationship Policy
- Petrobras' Social Responsibility Policy
- Ombudsman Policy
- Ethical Conduct Guide for Suppliers



#### 3.4.1 Our responsibilities

- Communicating in a transparent, truthful, in an easily understandable and accessible manner with all stakeholders, based on Petrobras' values.
- Respecting all groups and individuals who are directly or indirectly involved with the Petrobras System's units and enterprises, as well as their values and cultural heritage.
- Establishing partnerships that contribute to the mutual growth and development of the Petrobras System.
- Seeking fair and balanced solutions for the Petrobras System with different stakeholders, even in crises or conflicts, respecting their established rights and applicable contractual conditions.
- Ensuring transparent and ethical processes and efficient use of resources when making donations, sponsorships, or agreements.
- Recording interactions with government agents in accordance with internal rules, ensuring the traceability of such interactions.
- Cooperating with investigations and inspections performed by government authorities to which Petrobras or the companies in the System are subjects.



### 3.4.2 Inappropriate behavior

- Speaking on behalf of the Petrobras System without the proper consent.
- Performing activities that involve rendering services or maintaining a business relationship when the people or companies you are dealing with have a particular interest in decisions related to your work.



### 3.4.3 Leading by example

As a **leader**, you are also responsible for:

- Ensuring compliance with the guidelines that establish an appropriate relationship with our **stakeholders**.
- Assessing and managing risks that may affect the System's image and reputation, taking into account the possible impacts on its **stakeholders**.
- Promoting the understanding of the System's business and positions with the different **stakeholders**.

*We encourage our suppliers, business partners, and other counterparties to maintain transparent and fair relationships with their **stakeholders**.*







# 3.5

## BUSINESS COMPLIANCE

We repudiate any form of **fraud, corruption**, money laundering, and financing of terrorism. We are aware that there are many ways to do business, and in all of them, **ethics and integrity** are non-negotiable.



*In the Petrobras System, we are committed to promoting an honest, fair business environment in all of our relationships, including our operations. We do not support or finance illegal activities, nor practices that could be interpreted as influence peddling, terrorism, or practices which are harmful to the government. We avoid any and all situations generated by the conflict between the interests of the Petrobras System and personal interests, and we comply with antitrust rules. We also comply with the applicable regulations on import, export and domestic trade controls for goods and products, as well as the international economic sanctions and embargoes and restrictive trade practices.*



### WHY DOES THIS MATTER?

Acting ethically preserves the reputation and image of the Petrobras System, strengthening the trust of customers, partners and society in general. In addition, knowing how to prevent **fraud, corruption**, and conflicts of interests allows us to make ethical decisions, protect our personal integrity, and contribute to an honest **working environment**.



### TO REFLECT UPON

- › *Am I being transparent and acting ethically in all my activities?*
- › *Am I avoiding situations in which my personal interests may conflict with the company's*

*interests or that may harm the Petrobras System's reputation?*

- › *Am I being unbiased and not using my position to obtain personal benefits or benefits for others?*

### ALSO READ:



- Compliance Policy
- Internal Controls Policy
- Compliance Program



### 3.5.1 Our responsibilities

- Acting with honesty, diligence, ethics, and fairness in our activities and to encourage coworkers to do the same.
- Being familiar with and avoiding situations in which personal interests may conflict with the interests of Petrobras or of the companies in the System and to self-declare as prevented from deciding or participating in acts that may generate such a conflict.
- Being familiar with and complying with the internal rules and applicable legislation that address the prohibition of **nepotism**.
- Receiving or offer gifts, prizes and hospitality in accordance with applicable legislation and the internal rules of Petrobras or of the companies in the System.
- Acting impartially and objectively when participating in bidding processes.

To make inquiries about conflicts of interest and request authorization to engage in private activities, employees may use the *Electronic System for the Prevention of Conflicts of Interests (SeCI) of the Office of the Federal Controller General (CGU)*.



### 3.5.2 Inappropriate behavior

- Engaging in illegal or unethical activities.
- Using one's position or influence to gain benefits for oneself or for other people or groups.
- Promising, offering, giving, or authorizing, as well as requesting or receiving any favors, undue advantages or **facilitation payments**.
- Refraining from acting in cases of **fraud** and **corruption**, even when they do not involve monetary amounts.
- Using privileged information to conduct business or obtain personal advantages for oneself or third parties.
- Falsifying signatures or creating false information or documents.
- Engaging in or colluding with anti-competition behavior.
- Concealing, altering or destroying documents, information or records that are under investigation, as well as misleading or obstructing government actions.



### 3.5.3 Leading by example

As a **leader**, you are also responsible for:

- Supporting the network of **Integrity Agents** and encouraging teams to take part in ethics and integrity training sessions and other governance and compliance activities.
- Being aware of possible conflicts of interests and adopting actions to mitigate them.
- Not appointing, designating, or hiring spouses, life partners and **relatives up to the third degree**, whether yours or a spouse's or life partners, for positions or favoring them in any way.
- Not making mutual hirings, appointments, or designations between Petrobras' organizational units or between companies in the System, which constitutes cross-nepotism.

*Business partnerships, supplying companies, and all other counterparties must follow the same ethical standards as ours, including fighting **fraud, corruption, and illegal practices**. It is key to maintain a vigilant stance and ensure all involved parties are in line with such guidelines.*

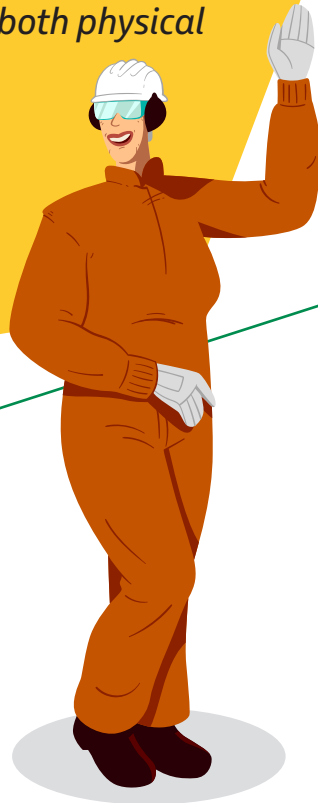




## 3.6

### PROTECTION OF CORPORATE ASSETS AND INFORMATION

We ensure the protection of assets, reputation, and image of Petrobras and of the companies in the System in all environments, both physical and virtual.



*In the Petrobras System, we have the duty to ensure the integrity of our assets, whether tangible or intangible, including knowledge, information, developed or acquired technologies, software, hardware, facilities, vehicles, equipment, materials, financial assets, intangible property rights, brand, reputation, image and credits.*



#### WHY DOES THIS MATTER?

Taking care of our assets, reputation, and image in all environments - including virtual environments such as an intranet, internet, social media, and other internal and external communication and collaboration channels - protects the Petrobras System. In addition, ensuring the confidentiality, integrity, availability and authenticity of corporate information ensures a competitive advantage and the sustainability of our business.



#### TO REFLECT UPON

- › *Am I producing or sharing truthful information and classifying it correctly?*
- › *Am I using assets, brand, or name of Petrobras or of the companies in the System for my own benefit or self-promotion?*
- › *Am I considering the impacts that my statements on social media and other communication platforms will have on me or on the Petrobras System?*

- › *Is my attitude on internal and external communication channels compatible with Petrobras' Values?*

#### ALSO READ:



- Protective Intelligence and Corporate Security Policy



- Policy on Disclosure of Material Acts or Facts and Trading of Securities



#### 3.6.1 Our responsibilities

- Properly using corporate assets for the activities and business of the Petrobras System.
- Using services, accessing, or sharing information from Petrobras or from the companies in the System responsibly and in line with their duties, whether on corporate or personal devices.
- Paying special attention when handling and sharing information that may affect important decisions, considering its economic, financial, legal, image, and reputation impacts.
- Protecting the confidentiality of Petrobras System information, classifying it according to its secrecy level, and also ensuring its truthfulness.
- Protecting the **intellectual assets** of the Petrobras System such as patents, trade secrets, copyrights and trademarks.

- Disposing of data, documents and information in a secure manner and not change or destroying original documents of evidentiary value, filing them in digital format, in the manner and within the terms defined by law.
- Reporting any vulnerabilities or incidents in any information security controls.
- Promoting or participating in political party or religious activities during working hours.
- Making political party or religious advertising on the premises of Petrobras, the companies in the System, or on their channels.
- Using social media to offend or defame people who have opinions that differ from those of Petrobras or of companies in the System.

- Not publish or disseminate information that is not yet publicly available to investors, journalists, customers, and competitors.
- Not produce or disseminate fake news or unverified facts, or make checks on the official channels of Petrobras and the companies in the System.

Remember that your obligations as part of the **workforce** and representative of the Petrobras System are the same in the physical and digital world.

*The personal use of corporate electronic resources is allowed, provided it is not against the law, does not jeopardize the image and reputation of the Petrobras System or its **workforce**, and does not harm work activities, company processes, or the security of information and its resources.*



### 3.6.3 Leading by example

As a **leader**, you are also responsible for:

- Ensuring responsible use of Petrobras System's assets and information by the teams.

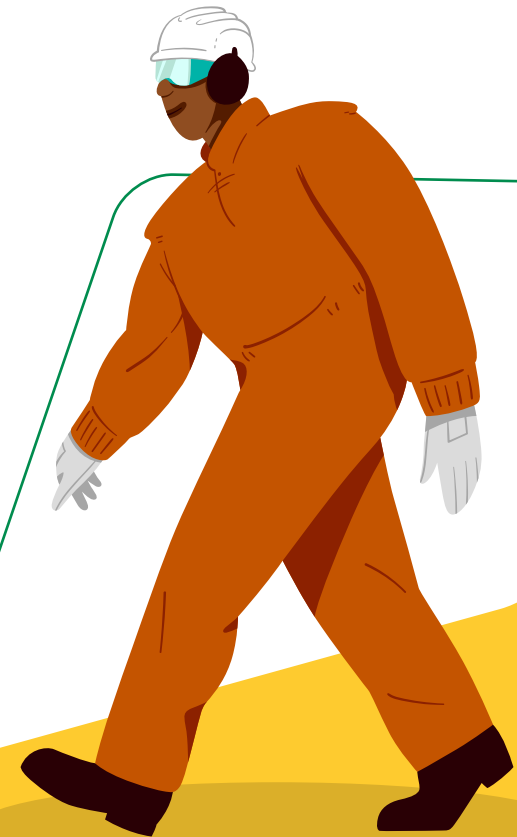


### 3.6.2 Inappropriate behavior

- Using the company's assets, its brand, or the Petrobras System's name to promote personal activities, unless expressly authorized by the department in charge.
- Storing, sharing, or displaying pornographic or offensive material on corporate devices or on the premises of Petrobras or the companies in the System.
- Sharing your passwords or using other people's passwords to access corporate systems and resources.

*Everyone has the right to express themselves and share their opinions when using personal media channels. However, express yourself responsibly and respectfully and be careful to:*

- Speak solely on your behalf, making it clear that your opinion is not the opinion of Petrobras or the companies in the System.
- Not make statements on behalf of Petrobras or the companies in the System without consent.
- Not share **classified**, **secret** or strictly internal **information**.

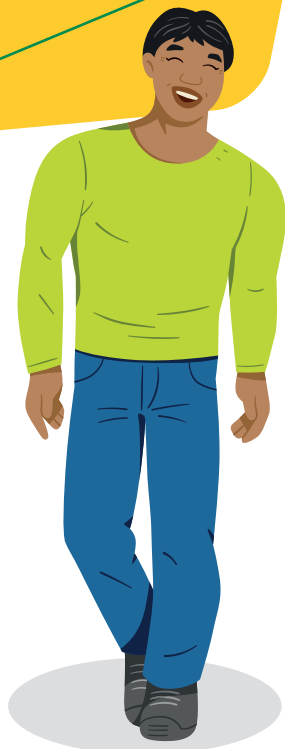




## 3.7

### PRIVACY & PROTECTION OF PERSONAL DATA

*We respect the rights to privacy and data protection*



*It is our duty to ensure and respect the right to privacy of the **stakeholders** with whom we interact and the right to protect personal data processed by the Petrobras System.*



#### WHY DOES THIS MATTER?

Privacy and the protection of personal data are constitutional and fundamental rights that must be respected. Merely accessing data is already considered processing, so it is important to consider the protection of personal data and privacy from the beginning of the development of processes and projects, in addition to knowing how to handle such a responsibility appropriately.

There should be no expectation of privacy when using the company's equipment and resources. Petrobras and the companies in the System may have access to the content produced, published or shared therein to protect their business. Consider this when using Petrobras' assets for private purposes.



#### TO REFLECT UPON

- › *Do I have the necessary knowledge to process the personal data I am dealing with?*
- › *Am I sharing my own or third-party personal data with people who do not have a direct interest in resolving these issues?*



#### ALSO READ:

- Privacy & Protection of Data



#### 3.7.1 Our responsibilities

- Checking which personal data is truly necessary before making any type of processing, especially before collecting, storing, or disclosing them.
- Processing only the minimum amount of personal data necessary.
- Processing personal data only for legitimate, specific, and explicit purposes informed to the data subject.
- Ensuring the quality of personal data at all stages of its processing.
- When using or developing technologies, including Artificial Intelligence, to adopt measures that promote innovation while the protection of fundamental rights such as privacy, protection of personal data, and **non-discrimination**, showing good faith in the Petrobras System and its concern for ethics in the company's business.



#### 3.7.2 Inappropriate behavior

- Processing personal information and data to which you have access in your professional activities for your own benefit or advantage.
- Disclosing or sharing personal information and data to which you have access in your professional activities without the proper consent.





### 3.7.3 Leading by example

As a **leader**, you are also responsible for

- Considering the protection of data and privacy from the beginning of the development of processes and projects.
- Seeking balance between the interests of the Petrobras System and the rights and expectations of users.

*To have a relationship with the Petrobras System, our counterparties must properly process personal data and protect the right to privacy, in accordance with relevant legislation.*





## 3.8

### RESPONSIBLE COMMUNICATION

*It is a key part of our duty to communicate promptly whenever we identify **inappropriate behaviors** or realize that any law, internal regulation or this Code is being violated or is about to be violated. This contributes to protecting both individuals and the Petrobras System.*

**If in doubt, raise your hand: prevention is always the best way.**



Talk to your **leader** to ask questions or show your concerns.



With **Petrobras' Ethics Committee**, you can clarify any interpretation questions on the guidelines contained herein by emailing [comissaodeetica@petrobras.com.br](mailto:comissaodeetica@petrobras.com.br).



The **Compliance** Department of Petrobras or the companies in the System can provide advice and opinions on compliance issues.



Refer to the **Integrity Agents** in your area or unit for guidance and actions related to promoting integrity.



If you wish to report any inappropriate behavior, use the **Reporting Channel**.



## REPORTING CHANNEL

Petrobras' Reporting Channel is an important tool for reporting any irregularities or **inappropriate behaviors**. This channel is available 24/7 through the internet or phone, to be used by anyone working within or outside the Petrobras System. It is independent, **confidential**, and ensures the confidentiality of all information and of the people involved.

## PETROBRAS DENOUNCEMENT CHANNEL

BRAZIL: **0800 601 6925\***



\* Check the phone numbers for other locations on the website. <https://contatoseguro.com.br/en/petrobras>

When completing a report, describe what happened in as much detail as possible. Information on "what", "when", "who" and "where" enriches the report and helps an effective investigation. Write down the protocol number generated by the Reporting Channel to monitor the process.

**Do you know what a good faith report is?** *It is one made sincerely, honestly, and truthfully, with no intention of harming or defaming anyone. Its intention is to contribute to protect the Petrobras System and the people.*



## WE DO NOT TOLERATE RETALIATION

**And what is retaliation?** It is when someone unduly suffers negative consequences for having made a report in good faith or honestly helped in matters related to inappropriate behavior. These consequences may include actions, omissions or threats intended to unfairly harm someone.

The Petrobras System is committed to protecting its **workforce** against retaliation against whistleblowers. This protection also extends to anyone who provides information or who processes a report. Therefore, if you feel you are being retaliated against or if you suspect someone is being retaliated against, do not hesitate to use Petrobras' Reporting Channel.

*It is key that we cultivate a working environment of trust, in which people feel safe to raise their concerns without fearing reprisals!*

In cases of complaints, requests, suggestions, and compliments, count on Petrobras' General Ombudsman's Office.

### ONLINE FORM

[www.petrobras.com.br/ouvidoria](http://www.petrobras.com.br/ouvidoria)

### PHONE NUMBER

**0800 282 8280**, Monday thru Friday, 07:00 a.m. to 07:00 p.m.

### MAILING ADDRESS

Rua Henrique Valadares, 28, 17º andar  
Centro - Rio de Janeiro / RJ  
Postal Code 20.031-030



## 4. GLOSSARY



**AFFIRMATIVE ACTIONS** are policies created or implemented by the Government or by Petrobras itself aimed at promoting equal opportunities and fighting **discrimination**, seeking to correct historical and structural inequalities that affect certain social groups such as women, black people, indigenous people, people with disabilities, among others.

**APPROPRIATE LANGUAGE** refers to the use of vocabulary, style and tone of communication that are appropriate to a given context or target audience. It involves using expressions, words and sentences that are clear, respectful, inclusive and culturally sensitive, taking into account linguistic, ethical and social standards. Appropriate language aims at avoiding the use of offensive, pejorative, discriminatory terms or those that may cause discomfort, embarrassment or misunderstanding.

**CLASSIFIED INFORMATION** is information that, if improperly disclosed, causes significant short-term damage. As for **secret information**, it is that which causes serious long-term damage, and may even jeopardize the survival of the company. At Petrobras, information is rated according to impact or damage criteria, in ascending order, in case of improper disclosure.

**CORRUPTION** refers to any direct or indirect action consisting of authorization, offering, promising, requesting, accepting, delivering or receiving an improper advantage, whether economic or not, involving individuals or legal entities, government officials or not, aimed at having a certain act performed or not performed.

**DISCRIMINATION** refers to actions or omissions, characterized by distinction, exclusion or preference, based on gender, race, age, sexual orientation and other issues addressed in the Code of Ethical Conduct of the Petrobras System which offends human dignity and changes the equality of opportunities that must be ensured to all individuals.

**FACILITATION PAYMENTS** refer to a type of corruption involving the payment of amounts to speed up or facilitate the performance of services or bureaucratic procedures that should be carried out legally and impartially.

**FRAUD** refers to any intentional action or omission aimed at harming or deceiving another person, capable of resulting in loss for the victim or improper advantage, whether patrimonial or not, for the perpetrator or other people. It is also characterized by the false statement or omission of material circumstances with the intention of misleading third parties.

**INAPPROPRIATE BEHAVIOR** are actions, attitudes, or conduct breaching the ethical principles and standards of conduct established in the Petrobras System which may be subject to disciplinary action, fines or other contractual impacts. Such behavior generally involves harmful, disrespectful, unethical or illegal actions that go against the principles and policies of the System. Examples of inappropriate behavior include workplace or sexual harassment, discrimination, violation of human rights, corruption, fraud, negligence in fulfilling professional duties, among others.

**INTEGRITY AGENTS** are employees, with or without a gratified position, who have the mission of disseminating and fostering integrity in the organizational culture of the company within their respective areas/units. In addition to being multipliers and facilitators, Integrity Agents also have an advisory role, clarifying doubts and providing guidance to colleagues on topics related to the Integrity System.

**INTELLECTUAL ASSETS** are human creations with market value in the industrial, scientific, literary or artistic fields and may form part of the assets of individuals or companies, and therefore must be protected by law according to their characteristics. The main forms are: copyrights on works, rights on software, brands, patents, industrial design, geographical indication, and creations protected by industrial secrecy.

**LEADERS** are professionals in charge of managing people, processes, and businesses, ensuring compliance with the company's management systems and policies. They represent the company before work teams, government authorities, the community, suppliers, customers, and partners, assuming responsibility for the risks and consequences of their actions. Within the Petrobras System's leadership model, the positions of the board members, managers at all levels and coordinators are highlighted.

**LGBTQIAPN+** is an acronym that stands for "lesbian, gay, bisexual, transgender, queer, intersex, asexual, agender, pansexual, and non-binary." The plus sign (+) represents other orientations, gender variations, and sexualities that are not specifically represented by the letters in the acronym.

**NEPOTISM** is the favoritism or benefit granted to family members, such as a spouse, partner, or relatives up to the third degree in direct or collateral line, by people in positions of trust, whether through appointments, assignments, or hiring.

**RELATIVES UP TO THE THIRD DEGREE** are father, mother, sons and daughters, grandfathers and grandmothers, great-grandfathers and great-grandmothers, brothers and sisters, uncles and aunts, and nephews and nieces.

**SEXUAL VIOLENCES** are groups of people or organizations with whom we create relationships and who are capable of influencing — or being influenced by — our company's activities, business and even its reputation. These relationships may be social, political, economic, environmental or cultural in nature.

**STAKEHOLDERS** are groups of people or organizations with whom we create relationships and who are capable of influencing — or being influenced by — our company's activities, business and even its reputation. These relationships may be social, political, economic, environmental or cultural in nature.

**WORKFORCE** encompasses all direct and indirect employees working in the Petrobras System, including their own employees, contractors, temporary employees, interns, young apprentices and service providers.

**WORKING ENVIRONMENT** refers to the physical location, as well as the organizational and social context where professional activities are performed. It is a place where workers perform their roles and contribute to the organization's goals and targets. In addition to the physical nature, which involves infrastructure, equipment and resources needed to perform tasks, the working environment also includes psychosocial aspects such as organizational culture, organizational climate, interpersonal relationships, people management policies and practices, among other factors that can influence the well-being, motivation and performance of the **workforce**.

**WORKPLACE HARASSMENT** refers to the set of abusive actions or omissions characterized by offensive gestures, words, behaviors or actions, whether explicit or subtle, which are disqualifying, discriminatory, humiliating and embarrassing, repeated and prolonged over time, arising from work relationships which violate people's dignity and are capable of jeopardizing their careers or harming their physical or mental health, in addition to other fundamental rights, and may lead to death and/or degrade the working environment.





**TO MORE INFORMATION ABOUT OUR GOVERNANCE AND COMPLIANCE INSTRUMENTS, VISIT THE PETROBRAS PORTAL OR THE FOLLOWING URL:  
[HTTP://WWW.PETROBRAS.COM.BR/PT/QUEM-SOMOS/PERFIL/COMPLIANCE-ETICA-E-TRANSPARENCIA/](http://www.petrobras.com.br/pt/quem-somos/perfil/compliance-etica-e-transparencia/)**

Version approved by Petrobras' Board of Directors on 27/09/2024.

