

## PETROBRAS' GUIDELINES FOR REPARATION FOR HUMAN RIGHTS VIOLATIONS

### APPROVAL

Guideline approved on 12/23/2025

### 1. OBJECTIVE

To set forth guidelines for the reparation for human rights violations, aiming to ensure redress and prevent recurrence.

### 2. SCOPE

This applies to Petrobras – Petróleo Brasileiro S.A.

### 3. DESCRIPTION

This guideline outlines the process for repairing duly proven human rights damages caused by Petrobras to an individual or community as a result of its activities, operations, products, or services.

#### 3.1 GENERAL PROVISIONS

The reparation process should be guided by the following fundamental principles:

##### **Respect for Human Rights and Legal Compliance**

3.1.1 Compliance with national and international legislation on Human Rights, including decisions of the superior courts and the Inter-American System of Human Rights – Inter-American Commission on Human Rights (IACHR) and Inter-American Court of Human Rights (IACHR), guaranteeing respect for internationally recognized human rights in all its activities, provided that they have been duly ratified by the Brazilian Government and are compatible with national legislation.

##### **Commitment to Reparation**

3.1.2 The right to reparation constitutes a fundamental principle of International Human Rights Law.

3.1.3 Reparation must be proportional to the damage incurred and proven, aiming to restore the previous situation whenever possible, ensure fair reparation, and prevent recurrence.

3.1.4 Reparation must consider the degree of responsibility of Petrobras, distinguishing between exclusive fault, contributory negligence, and fault of third parties, as well as assessing the severity of the damage and the effects on the affected people and communities.

3.1.5 Extrajudicial conflict resolution should be prioritized whenever possible, aiming at pacification and prevention of litigation.

3.1.6 The reparation process must be swift, transparent, participatory, and based on the centrality of the affected people.

##### **Centrality of people**

3.1.7 The centrality of people is the principle that recognizes the protagonism of the affected people, guaranteeing active participation in all phases of the reparation process. It must be ensured that affected people, especially those from vulnerable groups, are treated equitably, without discrimination, respecting their cultural and social specificities so that they can fully exercise their rights.

3.1.8 The reparation process must consider the claims of the affected people, as well as the conditions of socioeconomic vulnerability, and must not generate enrichment or impoverishment of the parties.

3.1.9 The reparation process, guided by the principle of equality, must preserve and respect the specific conditions and needs of each group or population that may be disproportionately affected, such as: indigenous peoples and traditional communities; women; black people; the elderly, children and adolescents; LGBTQIAPN+, people with disabilities; and migrant workers and their families.

3.1.10 Implement, when applicable, in emergency situations, preventive measures such as physical, financial and social support to affected individuals, ensuring, as far as possible, the participation of these individuals in defining the measures to be implemented.

### **Participation and Consultation**

3.1.11 In situations involving human rights violations, the affected individuals or communities, as well as their legal representatives, should be involved, where applicable.

3.1.12 Complaints related to human rights can present different natures and degrees/levels of severity, demanding proportionate and adequate responses.

3.1.13 Guarantee broad, equitable, legitimate, transparent, and participatory access, based on dialogue and the centrality of the affected individuals.

3.1.14 Offer a rapid response to requests for reparation.

3.1.15 Adopt a preventive approach with the objective of mitigating the risk of eventual judicialization of cases.

## **3.2 GUIDELINES FOR THE REPARATION PROCESS**

### **3.2.1 Mechanisms for Disclosure, Transparency, and Confidentiality (secrecy)**

3.2.1.1 It is essential to ensure that individuals and communities have broad access to a communication channel for registering complaints, suggestions, denunciations, and requests for redress. This channel must operate with agility, accessibility, transparency, and effectiveness, ensuring that all received expressions are treated with seriousness, respect, and impartiality in accordance with the United Nations Guiding Principles on Business and Human Rights and in alignment with applicable legislation.

3.2.1.2 Mechanisms for registering expressions (complaints, suggestions, requests, and compliments) and denunciations are essential instruments for redress.

3.2.1.3 Evaluate the degree of user satisfaction, as well as the reliability and credibility of the channels, according to internal standards.

3.2.1.4 Handle complaints, suggestions, denunciations, and requests for redress with maximum efficiency and agility to avoid aggravation of damages to Human Rights and eventual litigation.

3.2.1.5 Process received complaints, ensuring a clear, objective, accessible response within a reasonable timeframe regarding the analysis of the reported issue, with clarifications and any necessary actions to be taken.

3.2.1.6 Guarantee the confidentiality of information, limiting access only to authorized individuals and preserving the identity of the parties involved throughout the entire process.

3.2.1.7 Train individuals who receive and process complaints, suggestions, and reports in human rights conflict resolution and possess experience in implementing remedial measures.

3.2.1.8 Promote and ensure broad dissemination of channels for submitting complaints, suggestions, and reports to all interested groups and offer support to those facing access barriers.

3.2.1.9 Guarantee accessibility in communication and understanding of the stages of handling complaints, through objective and inclusive language. The channels for registering complaints (reports, suggestions, requests, compliments, and denunciations) must be available in languages other than Portuguese (English and Spanish) and accessible both by telephone and digitally, via the institutional website.

3.2.1.10 Ensure that affected parties have access to information and support to participate fairly in the reparation process.

3.2.1.11 Keep complainants informed about the timeframe and handling of their complaints.

3.2.1.12 The complaints received are analyzed and classified according to the severity, complexity, and priority of the report, according to the Petrobras Ombudsman's Priority and Complexity Matrix. This classification serves as a guide to define who should handle the case and what response measures are necessary.

3.2.1.13 Function as an alert system to identify and prevent problems related to human rights.

### **3.2.2 Assessment and Analysis of Damages**

3.2.2.1 The assessment must be based on documented evidence to ensure that the reparation process is well-founded and transparent.

3.2.2.2 It is essential to consider all dimensions of the damage, including physical, social, economic, and cultural aspects.

3.2.2.3 The damage analysis must identify the degree of Petrobras' involvement, differentiating situations where the company was solely responsible (exclusive fault) from those where there was partial contribution (contributory fault) and those resulting from the fault of third parties. This distinction is essential to define the extent of the reparation measures.

3.2.2.4 The assessment of the damage should be the focus of the evaluation. Accounts from affected individuals, their needs, and experiences provide essential information for assessing the actual damage and ensuring that the reparation is adequate.

3.2.2.5 Assessing the severity of the damage involves measuring the extent (number of people and areas affected), the duration (length of time the damage persists), and the depth (intensity of the damage). This analysis can guide the prioritization and type of reparation needed.

3.2.2.6 Each damage occurs in a specific environment, with its own social, cultural, and economic characteristics. The assessment must take these particularities into account to fully understand the consequences and adapt the responses to local realities.

### **3.2.3 Reparation Measures**

In cases of reparations for human rights violations, the following measures may be used, depending on each case:

3.2.3.1 Full Reparation: a principle according to which the reparation of damage must encompass all the negative consequences suffered by the affected person or community, seeking to restore, as far as possible, the situation prior to the damage. This includes measures that would compensate the ones involved for material, moral, social, and cultural damages, through restitution, indemnification, rehabilitation, satisfaction, and guarantees of non-repetition.

3.2.3.2 Restitution Measures: consist of restoring the previous legal situation.

3.2.3.3 Rehabilitation Measures: actions aimed at restoring the physical and mental health of affected individuals.

3.2.3.4 Compensation or Indemnification Measures: payment of sums of money to repair damages that can be economically assessed, encompassing material damages (actual damages and lost profits) and non-material damages (moral damages).

3.2.3.5 Non-repetition Measures: structural measures to prevent new violations, such as workforce training in human rights; Implementation of internal prevention policies; necessary structural reforms; improvement of conventionality control.

### **3.2.4 Reparation Implementation**

3.2.4.1 This step requires coordination between different areas, adequate allocation of resources, and monitoring of established deadlines.

3.2.4.2 It is essential to ensure that the implemented actions respect human rights and promote dignity, contributing to the restoration of conditions prior to the damage or to the improvement of the quality of life of those involved, when applicable.

3.2.4.3 Guarantee the monitoring of the execution of reparative measures, verifying whether the objectives are being achieved and whether the actions are producing the expected results, identifying any failures or deviations that may compromise the restoration of the affected rights.

3.2.4.4 Detect risks of recurrence of the damage, enabling the adoption of corrective or preventive measures in a timely manner.

3.2.4.5 Seek, as far as possible, the participation of the affected people in the monitoring, ensuring that their perceptions are incorporated into the analysis of the results.

3.2.4.6 Periodic reports and indicators contribute to the transparency of the process and to the improvement of organizational management.

3.2.4.7 Transparent communication is a fundamental principle throughout the reparation process, ensuring that affected parties and other stakeholders have continuous access to clear, accurate, and up-to-date information on the progress of reparation actions.

### **3.2.5. Final Provisions**

This guideline will be reviewed periodically to ensure its effectiveness and alignment with national and international best practices, reinforcing the company's commitment to corporate responsibility, human dignity, and organizational ethics.

## **4. RECORDS**

Not applicable.

## **5. DEFINITIONS**

Reparation: This refers both to the process of providing redress for a negative impact on human rights, and to the outcomes that can neutralize or offset the negative impact. These outcomes can take various forms, such as restitution, rehabilitation, full reparation, financial or non-financial compensation, as well as harm prevention or non-repetition measures.