

GUIDELINE FOR PREVENTING AND COMBATING DISCRIMINATION, MORAL HARASSMENT, AND SEXUAL VIOLENCE

1. PURPOSE

To establish the guidelines to prevent and eliminate discrimination, moral harassment, and sexual violence to ensure a respectful, dignified, healthy, safe, and sustainable workplace environment.

2. SCOPE

Applies to Petrobras and other companies in the Petrobras System, in accordance with their corporate procedures, as provided for in Article 16 of Petrobras' Bylaws.

3. DESCRIPTION

3.1. OVERVIEW

The relationships in the workplace must be based on the principles and commitments set out in the Code of Ethical Conduct, the Company's policies and guidelines, and the applicable law.

This guideline provides the steps for the Company to prevent and combat discrimination, moral harassment, and sexual violence everywhere it operates throughout the cycle of its projects, operations, and professional relationships.

Knowing and acting in accordance with this document is essential to maintain a safe and healthy workplace environment and to strengthen the Company's integrity environment.

3.2. APPLICABLE LAWS AND INSTITUTIONAL COMMITMENTS

In its operations both in Brazil and overseas, the Company is subject to, among others, the following harassment and discrimination laws:

- Convention No. 111 of the International Labor Organization (ILO) prohibits discrimination in the workplace based on gender, race, color, national extraction or social origin, religion, or political opinion.
- Committee on the Elimination of Discrimination against Women - CEDAW: Prohibits discrimination against women in all areas of their lives, including the workplace environment.
- International Covenant on Civil and Political Rights (ICCPR): Prohibits discrimination based on gender, race, colour, national extraction or social origin, religion, or political opinion, among others, and establishes everybody's right to equal treatment in the workplace environment.
- International Convention on the Elimination of All Forms of Racial Discrimination (ICERD): Prohibits racial discrimination in the workplace environment, establishing everybody's rights to equal treatment, regardless of race or ethnic origin.
- Constitution of the Federative Republic of Brazil 1988
- Consolidação das Leis do Trabalho (CLT): Prohibits sexual harassment in the workplace, regarding this form of violence that affects human dignity and equality among men and women as an immoral conduct liable to fair dismissal.
- Lei nº 7.716/1989: Classifies the crimes based on race or colour prejudice, including discrimination in the workplace environment.
- Lei nº 8.069/1990: Establishes the Statute of Children and Adolescents and other provisions.
- Lei nº 9.029/1995: Prohibits discrimination in the workplace environment based on gender, colour, race, and marital status, among others.
- Lei nº 10.224/2001: Amends the Brazilian Criminal Code to classify the crime of sexual harassment.
- Lei nº 11.340/2006: Provides for women's protection against domestic and family violence, including violence in the workplace environment.
- Lei nº 13.146/2015: Introduces the Brazilian Disabled-People Inclusion Act and prohibits discrimination in the workplace environment against disabled people.
- Lei nº 13.718/2018: Amends the Brazilian Criminal Code to classify the crime of sexual molestation and increase the penalties for rape.
- Lei nº 14.188/2021 – Classifies the crime of Psychological Violence Against Women.

- Lei nº 14.457/2022 – Establishes the “Emprega + Mulheres” Program.
- Lei nº 14.540/2023 - Establishes the “Prevenção e Enfrentamento ao Assédio Sexual e demais Crimes contra a Dignidade Sexual e à Violência Sexual Program within the direct and indirect federal, state, district, and municipal governmental administration.
- United Nations’ Global Compact.
- Women’s Empowerment Principles by UN Women.
- Iniciativa Empresarial pela Igualdade Racial.
- Open Letter Empresas pelos Direitos Humanos.

3.3. PREVENTION AND COMBATING OF DISCRIMINATION, MORAL HARASSMENT, AND SEXUAL VIOLENCE

The prevention and combating of discrimination, moral harassment, and sexual violence comprise a set of integrated actions structured based on the Compliance Program and the Petrobras Program against Sexual Violence according to the following pillars: prevention, sheltering, detection, remediation, and transparency.

3.3.1. PREVENTION

3.3.1.1 - Identify, assess, and treat the conformity risk posed by moral harassment, discrimination, and sexual violence in our activities by mapping risk factors, including confirmed complaints, to identify the areas most exposed to this risk and plan specific prevention actions.

3.3.1.2 - Promote and demonstrate the commitment of the Senior Management and other departments to preventing and combating harassment, discrimination, and sexual violence in the Company.

3.3.1.3 - Disseminate to all employees, senior management, and specific public sensitization and awareness actions concerning moral harassment, discrimination, and sexual violence practices and concepts, including their consequences to the victims, abusers, and INTERNAL \ Workforce organization, through in-person and online educational solutions (and mandatory content

depending on the format, among other variables) directed at employees and service providers of the administrative and operational areas.

3.3.1.4 - Apply our ethical principles and commitments to combat moral harassment, discrimination, and sexual violence in our supply chain and business partners through dissemination actions, contractual clauses, and third-party due diligence.

3.3.1.5 - Maintain and train a network of multipliers (Integrity Agents, members of the Women's and Diversity Groups, CIPAs – Comissões Internas de Prevenção de Acidentes e Assédio - and Human Rights Committees) to (i) answer specific questions about daily behaviors, facts, and occurrences in general; (ii) talk about the Sheltering Channel, the Denouncement Channel, the Investigation Procedure, and the Petrobras Consequence System; (iii) receive and refer to the areas in charge any suggestions to improve the Petrobras Program against Sexual Violence; and (iv) contribute to the dissemination of the theme by preparing and disseminating specific content, supported by the area managing this guideline.

3.3.1.6 - Disseminate the Company's institutional channels, such as the General Ombudsman and the Denouncement Channel, in the facilities and sites (internal and external) in all the companies part of the Petrobras System, through, but not only, communication efforts.

3.3.1.7 - Disseminate the Sheltering Channel and psychological support services across Petrobras's facilities and sites to their own and its supply chain employees.

3.3.1.8 - Disseminate and promote the precepts of whistleblower protection, through communication actions and training for leadership and the workforce.

3.3.1.9 - Establish, keep updated, and disseminate the "Discrimination, Moral Harassment, and Sexual Violence Prevention and Combating Booklet" (Annex A), which explores the issue, indicating expected and unacceptable behavior and conduct.

3.3.1.10 - Conduct and use the Engagement and Organizational Environment Survey, or others, to gather diagnoses from the areas that, combined with the statistical data from the Denouncement Channel, may help the planning of prevention, detection, remedy, and restoration strategies.

3.3.2. SHELTERING

3.3.2.1 - Provide a Corporate Support Channel ("Sheltering Channel") for the victims of sexual violence, available to Petrobras' employees and the ones working as part of Petrobras' supply chain, with a multidisciplinary and diverse team qualified and trained to assist by phone, in-person, or teleservice, always at the victim's discretion.

3.3.2.2 - Protect, on the Sheltering Channel, the identity of the victims and those who report or are reported, respecting their right to privacy and intimacy.

3.3.2.3 - Provide psychological support service, accessible to the own and Petrobras supply chain employees, to the victims that need a safe place and emotional support, including situations involving anxiety, depression symptoms, stress, and/or psychic suffering.

3.3.2.4 - Through the General Ombudsman and leadership, provide guidance and assistance to the victims of discrimination, moral harassment, sexual violence, and retaliation.

3.3.2.5 - Provide humanized, respectful, empathic, and judgment-free listening, based on equity, equality, and impartiality, as well as observing the confidentiality and secrecy of reported facts.

3.3.3. DETECTION

3.3.3.1 - Provide a corporate channel to receive and treat complaints (Denouncement Channel) about moral harassment, discrimination, and sexual violence; this is hosted in an environment outside the Company and operated by a specialized company.

3.3.3.2 - Keep the complaints in secrecy and treat them with impartiality and humanity, protecting privacy, secrecy, and the rights of all those involved in any investigation.

3.3.3.3 - Check and monitor the evolution in the number of moral harassment, discrimination, and sexual violence cases reported, using the data generated as a basis for preventive actions and restoration of the workplace environment.

3.3.4. REMEDIATION

3.3.4.1 - Provide a respectful, humanized, timely inquiry conducted by a specialized, multidisciplinary, and diverse team.

3.3.4.2 - Ensure that the interview(s) will be conducted by someone of the same sex or gender as the victim/person who complains, if this is their choice.

3.3.4.3 - Protect the physical and emotional integrity of both the victim and the whistleblower, considering the state of vulnerability due to, for instance, age, gender, disability, health conditions, or due to the conditions, nature, and duration of the victimization caused by the situation they have experienced, including the severe physical or psychological consequences generated.

3.3.4.4 - Ensure the proper preparation for listening and interviewing to prevent or minimize revictimization, considering that during those interactions, the victim recalls the events and relives the feelings and sensations suffered during the violence, which prolongs all the suffering caused.

3.3.4.5 - Evaluate the need for temporary precautionary leave, when recommended by the investigation area, in order to cease a possible deviation of conduct in progress or mitigate the danger of damage or risk to the facts inquiry.

3.3.4.6 - Deliberate the investigated cases of moral harassment, discrimination, sexual violence, and retaliation, whose decisions may include disciplinary measures such as: written warning, suspensions, or termination of the employment for just cause, to be imposed by the responsible management unit.

3.3.4.7 - Guarantee an impartial, swift, and grounded disciplinary judgment so that all the employees, including leadership and senior management, who present discriminatory, harassing, or retaliating conduct, receive the appropriate sanctions.

3.3.4.8 - Protected whistleblowers, witnesses, professional in charge of the investigation, and any person who provides information in a complaint about any kind of retaliation, even by the abusers; threats, intimidation, discrimination, isolation, or other form of damage to the career or reputation of such people will not be tolerated.

3.3.4.9 - Guarantee that the victim, or representative appointed by her/him, will monitor the entire complaint treatment process, in all the steps, to secure information about all the acts and measures taken in a transparent manner, and that feedback given in a humanized way.

3.3.4.10 - Ensure, in the internal procedures for inquiring and applying sanctions, the protection of the identity of all those involved in the complaint, respecting the right to privacy and intimacy.

3.3.4.11 - Adopt, where applicable, conflict resolution approaches without prejudice to any disciplinary sanction, seeking peace-making solutions through a permanent dialogue to resolve interpersonal conflicts and, simultaneously, to prevent their escalation and conformity with cases of violence at work.

3.3.4.12 - Implement work environment restoration practices.

3.3.5. TRANSPARENCY

3.3.5.1 - Periodically inform to the internal public (Petrobras Portal and other means) and external public (Sustainability Report) the balance of the complaints received, filed, and investigated, as well as the disciplinary measures applied, in cases of moral harassment, discrimination, and sexual violence, preserving the anonymity, secrecy, and privacy of those involved.

3.3.5.2 - To be accountable and transparent to our stakeholders about the Company's actions to prevent and combat moral harassment, discrimination, sexual violence, and retaliation through the Sustainability Report, external websites, social media, and internal communication on the Portal, e-mail, workplace, and other means.

3.4. AUTHORITY AND RESPONSIBILITIES

3.4.1. All the employees must

- Observe and apply the principles and duties under the Code of Ethical Conduct.
- Ensure that their behavior complies with the Company's commitment to preventing and combating all forms of discrimination, moral harassment, sexual violence, and retaliation. It also fosters a dignified and decent workplace.
- Carry out training in the topics under this guideline and to be attentive to actions that disseminate the theme.

3.4.2. Senior Management

- Unequivocally and continuously support actions, as well as monitor their improvement, that prevent and combat discrimination, moral harassment, and sexual violence in the workplace environment of all Petrobras System companies
- Continuously communicate to the internal and external public the Company's values against discrimination, moral harassment, sexual violence, and retaliation.

3.4.3. Leadership

- Conduct management and workplace relationships in a respectful, dignified, and decent manner, acting in accordance, themselves and their teams, with the Code of Ethical Conduct to promote a safe and healthy workplace environment.
- Sheltering the victim when requested, providing empathic and judgment-free support based on fairness, equality, and impartiality, and respecting confidentiality as the case may be. INTERNAL \ Workforce

- Inform of the Sheltering Channel and psychological support service, and also encourage those who report being victims to register their report on the Denouncement Channel.
- Evaluate the equitable reliefs recommended by the Corporate Integrity (INC) and disciplinary measures defined by the Integrity Committee for those employees who commit an act of discrimination, moral harassment, sexual violence, and retaliation.
- Adopt management measures and, for the supply chain of Petrobras and other companies of the system, appropriate contractual measures for those involved in discrimination, moral harassment, sexual violence, and retaliation.
- Communicate, immediately and directly, to Corporate Integrity (INC) any flagrant cases, in which an investigative procedure is not need.
- Consult the General Ombudsman to analyze any concrete case, when they become aware of reports on their team, that they think should be investigated and the possible victim refuses to seek the Denouncement Channel.

3.4.4. Communication

- Disseminate the guidance, sheltering, and denouncement channels and set up awareness campaigns on the issue (e.g., posters, videos, electronic system screens, surveys, among others).
- Disseminate report with complaints and disciplinary measures taken.

3.4.5. Compliance

- Assess the risk of moral harassment, sexual violence, and discrimination in conformity with the Company's business risk matrix, identifying the most exposed areas to implement specific prevention actions.

- Disseminate the integrity culture, periodically guiding the Company's areas/units on specific practices to prevent and combat discrimination, moral harassment, and sexual violence through communication and training.
- Coordinate the respective dissemination actions with the multipliers network.
- Manage the Compliance Program.
- Review and regularly update this guideline and its respective attachments due to the excellent market practices, the improvements to internal diagnoses, and updates on the applicable laws to ensure the evolution of such actions to prevent and combat discrimination, moral harassment, and sexual violence in the workplace environment.

3.4.6. General Ombudsman

- Manage the Denouncement Channel, providing a good service in line with the Company's procedures to obtain the information necessary for the eventual investigation process for the discrimination, moral harassment, sexual violence, and retaliation cases. Also categorize the complaints, shelter the person who complains, explain the entire complaint treatment process, gather additional information, have the complaints investigated, and check the measures to be taken, ensuring their traceability.
- Establish procedures to receive, handle, and transfer the complaints of discrimination, moral harassment, sexual violence, and retaliation.
- Establish guidelines to protect whistleblower, witnesses, professionals in charge of the investigation, and anyone who provides information in a complaint from retaliation.
- Implement actions to repair the workplace environment, if applicable, for the cases of discrimination, moral harassment, and sexual violence registered in the Denouncement Channel.
- Prepare and disseminate reports on complaints and disciplinary measures taken.

3.4.7. Corporate Integrity

- Carry out the investigation related to complaints of discrimination, moral harassment, and sexual violence promptly, effectively, and impartially.
- Propose temporary leave in a preventive manner where applicable.
- Adopt conduct adjustment mechanisms as a substitute to disciplinary measures, where applicable.
- Provide a diverse and multidisciplinary team specializing in investigating cases of discrimination, moral harassment, sexual violence, and retaliation.

3.4.8. Integrity Committee

- Define with isonomy, transparency, independence, considering the precedents of the committee, the disciplinary measures management may apply to the Petrobras employees mentioned in incidents/investigations performed by the Company or other companies part of the Petrobras' System, related to discrimination, moral harassment, sexual violence, and retaliation.
- Homologate the Terms of Commitment.

3.4.9. HSE

- Manage the Sheltering Channel.
- Act from an inter and transdisciplinary perspective to ensure full-time and humanized care to people affected by discrimination, moral harassment, or sexual violence.
- Provide care by specialized professionals of the Psychological Support Emergency Service and Social Support Emergency Service on request.
- Assist the CIPAS (Comissão Interna de Prevenção a Acidente e Assédio) in preventing discrimination, moral harassment, and sexual violence in line with the Compliance department.
- Implement actions to repair the workplace environment, as applicable, for the cases of sexual violence registered in the Denouncement Channel.

3.4.10. Social responsibility

- Manage the Petrobras Program against Sexual Violence.
- Coordinate the Human Rights Committee and support Diversity and Inclusion Groups to prevent discrimination, moral harassment, and sexual violence, in line with the Compliance department.

3.4.11. Human Resources

- Conduct engagement and organizational environment surveys.
- Support the leadership in management actions that prevent and eliminate discrimination, moral harassment, sexual violence, and retaliation.
- Implement actions to develop interpersonal skills in the employees and leadership that may significantly impact the prevention and combat of discrimination, moral harassment, sexual violence, and retaliation by creating a respectful, reliable, diverse, and inclusive workplace.
- Guide the management of diversity, equity, and inclusion in the Company to contribute to a workplace environment that appreciates and respects diversity free from discrimination, moral harassment, and sexual violence.
- Support the managing unit in taking managing measures.
- Supervise the managing unit's application of the disciplinary measures defined by the Integrity Committee and communicate it so the applicable measures can be adopted in case of non-compliance.

3.5. COMMON CORPORATE RULES

We recommend that the Petrobras System companies apply the guidelines described in this Standard, which constitute the Common Corporate Rules - RCCs, adapting them to its existing structure and decision-making levels.

4. DEFINITIONS

Moral harassment - A set of abusive actions or omissions that include gestures, words, attitudes, or offensive, explicit or sutil, demeaning, discriminating, humiliating, and embarrassing actions recurring and prolonged over time (habitually) resulting from working relationships that violate a person's dignity and can compromise their career and/or cause damage to their physical and/or psychological integrity, in addition to other fundamental rights, which may lead to death and/or deterioration of the workplace environment. The indicator includes frequency – actions that repeat within a short time; and duration – a conflict happening for roughly six months or more.

Sheltering Channel - Psychological support to the entire Petrobras workforce that suffers sexual violence at work and its consequences, guaranteeing specialized remote service 24/7. In addition to the in-person service, when indicated by a qualified professional at the Petrobras healthcare centers.

Discrimination - Action or omission based on difference, exclusion, or preference according to gender, race, age, sexual orientation, and other issues addressed in the Petrobras System's Code of Ethical Conduct, which violate human dignity and changes the equality of opportunities that must be guaranteed to all.

Equitable relief - Measures recommended by the Corporate Integrity (INC) area to cease a possible deviation of conduct in progress or mitigate a possible danger of damage or risk to the assessment of facts.

Managing Measures - Measures taken by the leadership to handle interpersonal conflicts on the team to preserve the physical and psychological integrity of those involved. Adopting managing measures, as long as they are not imposed with disciplinary intent, does not prevent the analysis of the case and the imposition of corrective measures.

Disciplinary Measures - Measures concerning the employees who commit disciplinary faults.

Professional Relations - the relationship between two or more people in the professional scope of the Petrobras System, be they employees, service providers, or the outside public.

Restoration Practices - practices adopted to understand which structural conditions in the environment enable harassment or discrimination. In contrast with the punitive paradigm, those practices establish that individual behaviors must be properly contextualized and specific cases must be read as structural reflexes, which must also be addressed. Such practices create opportunities for discussion that may effectively contribute to repairing damages, restoring relationships, holding people liable, and restoring healthy relations.

Revictimization – Also called secondary victimization, this phenomenon comprehends systemized violence. A victim experiences the violence several times, even after the original abuse has ceased. For instance, when the victim is forced to recall, over and over again, the violence suffered and relive the feelings and sensations at that time, which extends the damage done.

Decent Work – A concept formalized by the ILO in 1999 that summarizes its historical mission of creating opportunities for men and women to do productive, quality work with freedom, equality, INTERNAL \ Workforce safety, and human dignity, which is considered a vital condition to overcome poverty, reduce social inequality, ensure democratic governability, and sustainable development.

Sexual Violence – Any isolated or recurrent behavior, practice, or threat of a sexual nature that causes or aims to cause physical, psychological, sexual, or economic damage to the victims, be they intentional targets or involved in an impersonal or incidental manner.

5. ATTACHMENTS

- a. Discrimination, Moral Harassment, and Sexual Violence Prevention and Elimination Booklet - [Social Responsibility: actions for a better world | Petrobras](#)