

PETROBRAS CORRUPTION PREVENTION PROGRAM

APPLIED TO TRANSPETRO



TRANSPETRO

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Introduction

The Petrobras Corruption Prevention Program (PPPC) is the integrity program applied to Transpetro, driven by continuous actions to prevent, detect and correct fraud, corruption, money laundering and terrorist financing, consolidated in this document.

The program is aimed at our various stakeholders, such as: customers, suppliers, agents, other business partners, investors, Public Authorities and employees.

Its reading and dissemination, together with the Code of Ethics and the Guide of Conduct of the Petrobras System, strengthens the commitment of all to ensure a healthy and transparent environment, with zero tolerance for any type of misconduct, especially with the prevention and fight against fraud, corruption and money laundering.

The management of the PPPC is carried out by the Executive Management of Governance, Risks and Compliance, through the Compliance Management, in conjunction with several areas of our governance structure.

1. Anti-Corruption Laws

In the development of our activities, in Brazil and abroad, we are subject to the following national and international anti-corruption laws:

- Law 12.846/13 which provides for the administrative and civil liability of legal entities for the practice of acts against the national and foreign public administration.
- *Foreign Corrupt Practices Act 1977 (FCPA)*, a United States federal law against transnational corruption that obliges companies to maintain books and records that accurately reflect their transactions and establish an adequate system of internal controls.
- *UK Bribery Act 2010*, The UK's anti-corruption law, which allows UK courts to try fraud and corruption-related crimes committed by companies incorporated in the UK or conducting operations in the UK.

Other anti-corruption laws may apply to our activities, depending on the country of incorporation of Transpetro's companies/corporations or the place where they operate.

2. Compliance Policy

It represents an important instrument for promoting corporate integrity, describing the principles and guidelines assumed by Transpetro in preventing and combating fraud, corruption, money laundering and terrorist financing, in all its forms, estimating an environment with the highest ethical values, responsible involvement and fair practices in relations with the entire production chain.

It is part of one of our principles "act primarily in a preventive manner, being able to inhibit any act, intentional or not, of violation of the behaviors and attitudes required, mitigating the risk of occurrence of any misconduct."

Among the guidelines, we require from our administrators and managers additional responsibility with the effectiveness of *compliance* actions, serving as a legitimate example of ethical action for all stakeholders.

Our Compliance Policy is available for consultation on our internal portal and on the website.

3. Ethics Management System

It is the articulated set of institutional actions to promote, diagnose, ascertain and monitor conduct in the company, in order to ensure the adequate and effective treatment of ethical issues.

The Ethics Committee aims to promote the management of ethics in the company. It is responsible for guiding, disseminating and promoting compliance with the ethical principles and commitments of conduct established in the Code of Ethics of the Petrobras System, in addition to proposing updates through the incorporation of new concepts and practices. It also advises Senior Management in decision-making regarding its non-compliance.

3.1. Petrobras System Code of Ethics

The Code of Ethics of the Petrobras System, adopted at Transpetro, covers the members of the Board of Directors, Fiscal Councils, Executive Boards, occupants of management functions, employees, trainees and service providers of Transpetro, constituting an individual and collective commitment to comply with it and promote its fulfillment, in all actions of the Transpetro production chain and in its relations with all interested parties.

It defines Transpetro's ethical principles and commitments to conduct in relations with its stakeholders, such as employees, customers, suppliers, other business partners and the Government, explaining the ethical sense of our Mission, Vision and Strategic Plan.

Our ethical principles, among others, are: “respect for life and all human beings; integrity; truth; honesty; justice; equity; institutional loyalty; responsibility; zeal; merit; transparency; legality; impersonality; and consistency between discourse and practice”.

We are committed to refusing any practices of corruption and bribery, maintaining formal procedures of control and consequences on any transgressions that have occurred in our relations with society, the government and the State.

The dissemination of the content of our Code of Ethics is addressed to all employees at the time of joining the company and, continuously, throughout

their career, in which they must formally register that they are aware of its terms. In addition, our suppliers are advised to respect our Code of Ethics

The employee, in breach of the principles and commitments of conduct expressed in our Code of Ethics, is subject to penalties provided for in the disciplinary regime.

Our Code of Ethics is available for consultation on our internal portal and on the website on the internet.

3.2. Petrobras System Conduct Guide

It consists of practical developments of the Code of Ethics of the Petrobras System and other regulations.

It covers all persons subject to the Code of Ethics and presents the conduct to be adopted, guided by the principles of respect, honesty and responsibility, among others. These behaviors make up the basic rules for ethical action and should be observed as behavioral guidelines in situations of professional life or as a result of it, especially those that can be interpreted as contrary to the laws and our internal rules, in the workplace or outside it.

The Guide aims to prevent misconduct, promoting the dissemination of educational guidelines and activities, without prejudice to the application of appropriate disciplinary measures when such deviations are found.

Employees and members of the Board of Directors, Executive Board and Fiscal Council, in addition to knowing and following it, must formally register that they are aware of its terms. Reading it is also recommended to partners and suppliers.

Our Conduct Guide is available for consultation on our internal portal and on the inter-net website.

4. Fraud, Corruption and Money Laundering Risk Management

Corporate risk management is carried out at the corporate level and deployed in the organizational units.

Currently, such risks are classified into four groups of different natures:

operational, business, financial and compliance.

The Compliance Management is responsible for promoting, monitoring and guiding the actions of managing the risks associated with fraud, corruption and money laundering.

Such risks are the subject of identification, analysis and evaluation processes, based on a reference method, the result of which is consolidated in a specific risk matrix.

The Board of Directors, advised by the Audit Committee, is responsible for defining the risk appetite of the company and for monitoring the management of business risks.

5. Communication and Training

We disseminate the culture of control and compliance through communication and training actions, which include on-site and distance courses, lectures, campaigns, communications, publications, among other modalities and forms, which contain subjects common to all employees, of all hierarchical levels, and specific to those who develop activities with greater exposure to the risk of fraud, corruption and money laundering.

Our objective is to guide and transmit knowledge to employees regarding legal requirements and responsibilities, as well as corporate guidelines, enabling them to identify, prevent, treat and communicate risk situations or with indications of fraud, corruption or money laundering in the company's business.

6. Compliance Agents

In addition to the structure responsible for compliance actions, we have employees from the various organizational units of the company that act as *compliance* agents, and are committed to being disseminators of the compliance culture, encouraging discussions that include the deployment of guidelines regarding compliance with internal laws and regulations, especially those related to combating fraud, corruption and money laundering.

Such professionals also assist in the identification of risks and in the improvement and improvement mechanisms for the prevention and detection of misconduct.

7. Compliance Competence

The process of evaluating the results of all our employees considers the company competence called "commitment to compliance", whose objective is to evaluate its ability to carry out activities focused on the prevention of non-conformities, with respect to standards, procedures, regulations and laws, thus strengthening the internal control environment, as well as our image and reputation.

The level of complexity and requirement of this competence varies according to the employee's level of responsibility, and managers are required to have a greater commitment, which includes the promotion, encouragement and appreciation of the compliance culture, guaranteeing the resources and sponsorship necessary for the implementation of compliance actions.

8. *Background Integrity Check - BCI*

The BCI consists of a systematic survey of information, through consultation with public and private databases and various control areas within Transpetro, which are consolidated in a report sent to the manager.

BCI aims to subsidize managers with information regarding nominees for designation to key positions, without prejudice to meritocracy.

9. Conflict of Interest

Conflict of Interest is detrimental to our business and the internal control environment, as it may improperly influence the conduct of our employees.

A conflict of interest is any situation generated by the confrontation between the interests of Transpetro and the individuals of its employees, which may compromise the interests of Transpetro or improperly influence the performance of the activities of our employees.

We maintain communication instruments available for consultations on potential situations of conflict of interest and request for authorization to carry out activities that, depending on their nature, may conflict with the interests of the company.

10. Nepotism

The employees of the company, in the exercise of a gratified function, are prohibited from favoring a spouse, partner or relatives in a straight or collateral line, by consanguinity or affinity, up to the third degree, in labor relations, in the hiring of third parties and in the contractual execution.

As a condition for contracting goods and services, we ask the supplier for a formal statement that its managers, partners or employees have no relationship with our employees in the exercise of a gratified function in the area responsible for contracting, or authorities hierarchically superior to them, to configure the practice of nepotism.

During the contractual execution, if we identify a situation of nepotism, we request the contracted company to replace the professional in question, under penalty of fines or termination of the contract, without prejudice to the determination of the facts and application of the respective system of consequences.

11. Presents, Gifts and Hospitalities

Receiving or occasionally offering presents, gifts, and hospitality can be a legitimate contribution to good business relationships between organizations. However, it can also represent an opportunity for fraud and corruption to occur. Thus, we prohibit this practice in exchange for any personal benefit or favor to the offeror or third parties.

Items received in disagreement with compahia standards must be returned. However, the exceptions provided for in our internal regulations must be properly documented and occur in an open, clear and transparent manner, in order to avoid the occurrence of a potential conflict of interest.

The Petrobras System Conduct Guide and the specific internal regulations that deals with the receipt and offer of presents, gifts and hospitality detail the guidelines applicable to the subject and must be consulted before any decision is made.

12. Relationship with Third Parties

The relationship with third parties may represent business opportunities, in line with the company's strategic and operational objectives, as well as result in a risk of non-compliance with national and/or international anti-corruption legislation, including possible financial damage or damage to our image and reputation.

12.1. Suppliers

They are individuals or legal entities that provide goods and/or services to Transpetro segments.

The contracting of works, services and purchases are governed by Law 13.303/2016 and by Petrobras Bidding Processes and Contracts Regulation (RLCP), which complements the provisions of the law.

During the contractual relationship, we formally require our suppliers to comply with their activities based on Transpetro's ethical principles and commitments of conduct, in addition to compliance with anti-corruption legislation.

In order to reduce exposure to risks of fraud, corruption and money laundering, we have created mechanisms to support and guide employees who carry out activities related to the demands for goods or services, those who conduct the contracting process and those responsible for their approval. We also establish limits of competence, updated and approved periodically by the Executive Board, to enter into contracts.

12.2. Integrity *Due Diligence*

The DDI corresponds to the assessment of the Degree of Integrity Risk (GRI) to which Transpetro may be exposed in the relationship with its suppliers, customers and other business partners, based on information related to their reputation, suitability and anti-corruption practices.

The IDD process is risk-based and considers criteria such as: the geographic location of the company and the execution of the business, its reputation history, its interaction with public agents, the effectiveness of its integrity program and the nature of the intended business.

The result of the DDI is documented and used by our managers to make decisions about the beginning or continuity of the business relationship and to define the level of monitoring of the potential risks of fraud and corruption identified.

13. Sponsorships and Agreements

The conclusion of sponsorship contracts and agreements contributes to economic development, to the promotion of the quality of life of society and the communities where Transpetro operates, consolidating its image and reputation. The realization of socio-environmental projects is one of the effective mechanisms for sustainable corporate action and reinforces the strategic positioning of the company to act with social and environmental responsibility.

We maintain procedures for the selection, contracting, execution and monitoring of agreements and sponsorships, in order to prevent deviations.

Among the procedures and controls we adopted, the following stand out: public selections of socio-environmental and cultural projects, which have the participation of internal evaluators and are outside the company; establishment of limits of competence for the conclusion of contracts, including with the Government; physical and financial monitoring of the projects; and confirmation of the execution of the project and the image counterparts. The disbursement is made in installments and the transfer of funds occurs only upon proof of compliance with the obligations signed in the previous stage.

14. Support and Contributions to Political Parties

We are committed to refusing support and contributions to political parties or political campaigns of candidates for elective office.

15. Donations

We prohibit the donation of assets, except unserviceable movable assets, with destination linked to social projects and/or actions and/or public interest or in the event of public calamity.

16. Accounting Books and Records

We maintain accounting books and records that reliably reflect our operations.

Our internal control environment provides reasonable assurance that the authorizations and records of our transactions are carried out properly, in order to allow the preparation and disclosure of distortion-free financial reports and in accordance with Brazilian and international accounting laws and standards.

The company's internal control systems over financial reporting are tested annually by internal auditors and by an independent audit.

17. Money Laundering and Terrorist Financing Prevention

The crime of money laundering is configured in any financial transaction that generates an activity or an amount that is the result of an illegal act. The purpose of money laundering is to ensure that the money resulting from an illegal activity can be used legally. In this sense, it presupposes a previous crime, such as fraud, corruption, terrorism, drug and/or human trafficking, tax evasion, larceny, counterfeiting, piracy, among others.

No company is immune to the risk of being unduly involved by critical organizations in situations related to money laundering, thus compromising its image and reputation.

Transpetro is committed to mitigating the risk of money laundering and terrorist financing in its operations. To this end, we adopted measures for the prevention, detection, analysis and communication of potentially suspicious situations and atypical operations.

18. Prohibited Payments

We prohibit any kind of direct or indirect payment or extortion requests by employees, as well as rejecting those made by a Public Authority or third parties.

Any request for payment or extortion by employees must be registered in the Reporting Channel for due treatment and investigation, and is subject to the disciplinary regime or consequences system.

If any employee is a victim of extortion or payment request, we advise you to contact the Compliance Management and the Legal Department.

18.1. Bribery of Public and Private Sector Authorities and Facilitation Payments

It is forbidden to offer, promise, authorize or make payments in cash or anything of value, directly or indirectly, to Public Authorities or third parties, in order to obtain any type of undue advantage.

Transpetro, through the Code of Ethics, undertakes to "refuse any practices of corruption and bribery, maintaining formal control procedures and consequences on possible transgressions" in relations with society and the Government.

Through the Petrobras System Conduct Guide, our employees undertake "not to insinuate, promise, offer or pay bribes, kickbacks or any undue advantage, including payments to obtain or expedite the processing of government documentation, obtaining licenses, release of goods, among others, both directly and through intermediaries."

19. Complaint Channel

We encourage all Transpetro employees, as well as all other stakeholders, to record any situation that indicates a violation or potential violation of ethical, political principles, rules, laws and regulations or any other improper and/or illegal conduct.

We provide safe and reliable communication channels, including an external and independent Reporting Channel, unique to the entire Petrobras System, and equipped with security mechanisms to ensure the anonymity of the whistleblower, who can monitor the progress of their complaint.

The General Ombudsman is the area responsible for handling the demands received by an independent and specialized company, contracted for this purpose, forwarding them to the areas of investigation and communicating the

results achieved to the Board of Directors, to which it is bound.

Our Reporting Channel can be accessed at www.contatoseguro.com.br/petrobras. The telephone service is available in several languages and countries and can be consulted on our internal portal and on our website.

19.1. Non-Retaliation

We promote an environment of protection against any form of retaliation to those who, in good faith, denounce the practice of crimes, acts of misconduct, violation of rules and/or laws or any other unlawful act committed against the company.

Acts of retaliation and complaints made in bad faith will not be tolerated, and constitute actions of improper conduct, which, if identified, subject those responsible to the sanctions provided for in our disciplinary regime.

20. Investigated Procedures

We carry out investigations in order to ascertain evidence, occurrences or complaints of fraud, corruption and money laundering involving our employees and/or assets, subsidizing administrative measures, improvements in processes and application of disciplinary sanctions.

It is the duty of every employee, whenever they encounter facts or acts that may constitute a misconduct, to report them to the Complaint Channel, for due treatment and referral to the company's complaint investigation areas. Such calculations are conducted independently in relation to the organizational unit in which the facts occurred.

The calculations are carried out in compliance with the principles of objectivity, confidentiality and im-partiality, based on the assumption of good faith, in order to obtain the truth of the facts.

21. Disciplinary Regime and System of Consequences of Senior Management

For cases of misconduct, fraud or corruption, our disciplinary regime provides

for penalties such as warning, suspension or termination of the employment contract for cause, according to the seriousness of the case, being prohibited the application of verbal warning in the event of non-compliance with the Code of Ethics and the Guide of Conduct, and prohibited the application of warning in cases of non-compliance with the PPPC. Conduct framed as fraud and/ or corruption will be sanctioned upon termination of the employment contract for cause.

21.1. System of Consequences of the Board of Directors, Executive Board and Fiscal Council

Transpetro requires that the members of the Senior Management, the Fiscal Council and occupants of statutory positions know and observe the ethical principles and preserve a conduct consistent with the commitments established by the Petrobras System. In the event of misconduct and/or irregularities, our consequences system provides for the penalties of written warning or dismissal of the function.

22. Administrative Accountability Process

Transpetro, as a member of the Indirect Public Administration, has the duty to initiate Administrative Accountability Proceedings (PAR) to determine the administrative liability of legal entities for the practice of harmful acts, in accordance with Law 12.846/2013 and Decree 8.420/2015, which regulates it.

Once the responsibility for the practice of harmful acts has been determined, the legal entity may be sanctioned with a fine, extraordinary publication of the condemnatory decision and application of sanctions provided for in the contracting rules.

It is the duty of all employees, when identified signs of harmful acts provided by law, practiced by a legal entity, to register this occurrence in the Petrobras Reporting Channel.

23. Transparency and Access to Information

As one of Transpetro's ethical principles, transparency manifests itself as respect for all stakeholders and is carried out in a manner compatible with personal privacy rights and information security policies.

In order to facilitate access to public information, Transpetro makes available on the external website company data that are of collective or general interest and the Citizen Information Service (SIC), created to request public information, in accordance with the Access to Information Law (Law 12.527/2011) and Decree 7.724/2012.

We disclose on the website the company's institutional data, comprising our organizational structure, corporate strategy, internal standards, governance instruments, compliance processes and activities and our fields of activity, and among other information and documents of public interest.

24. Continuous Monitoring and Enhancement

We submitted the Petrobras Corruption Prevention Program (PPPC) to a periodic evaluation in order to verify its effectiveness and compliance with the laws and to identify opportunities for improvement.

Annually, we carry out research on compliance actions, aimed at all employees, in order to verify the results achieved, positive points and points that can be improved.

In addition, the Executive Management of Governance, Risks and Compliance, through the Compliance Management, monitors and consolidates the actions mentioned in the program for registration and periodic reporting to Senior Management.

