

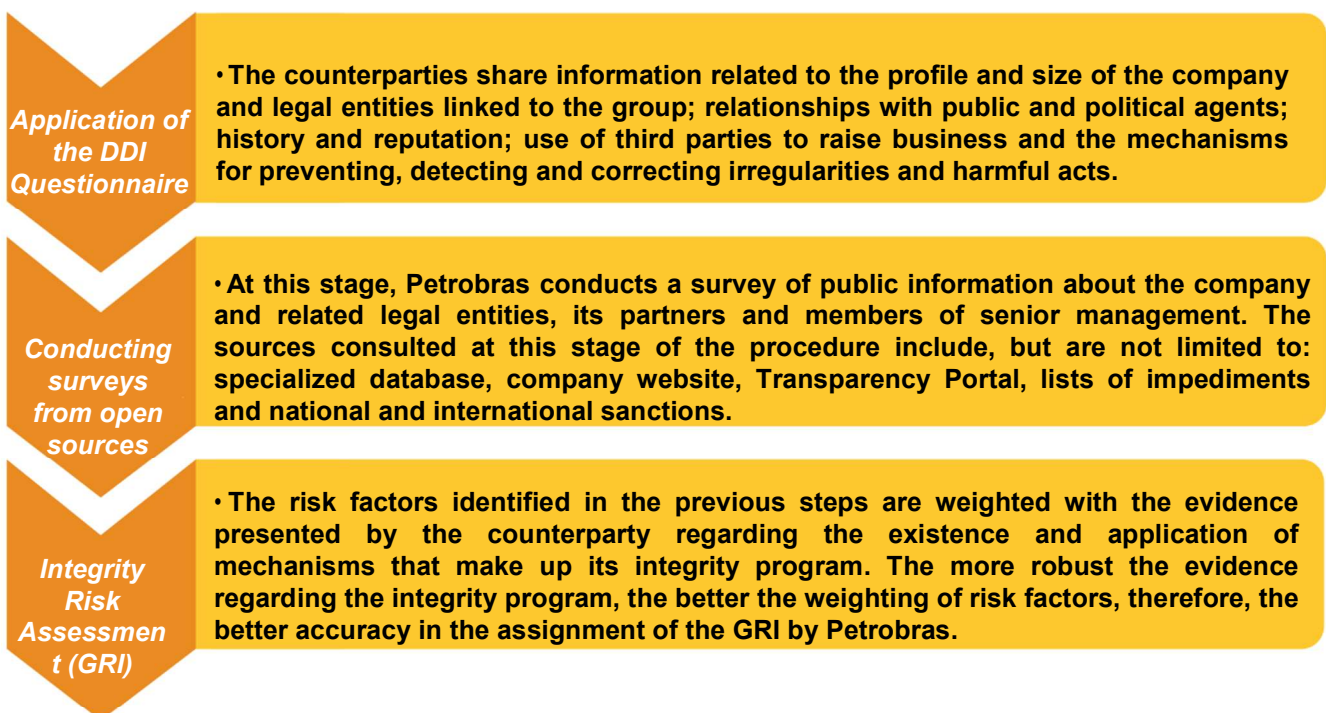
PROCEDURE FOR ***DUE DILIGENCE OF INTEGRITY (DDI)*** OF PETROBRAS

The Integrity Due Diligence (DDI) procedure is part of the Petrobras Corruption Prevention Program (PPPC) and seeks to assess the integrity risk to which Petrobras may be exposed in the relationship with its suppliers, customers, sponsored companies, partners and other counterparties, as provided for in art. 42, XIII, of Decree 8.420/15 and aligned with international best practices.

The DDI is carried out from the analysis of information collected through the DDI questionnaire and research, considering the profile, history, reputation and anti-corruption practices implemented by the counterparties.

The result of the DDI is the assignment of the low, medium or high Integrity Risk Level (GRI).

For the assignment of the GRI, the DDI procedure provides for three relevant steps:



It is important to note that the extension of the IDD procedure is proportional to the factorstof integrity risks identified by Petrobras in each of these stages.

For a better understanding of the risk factors analyzed in the IDD procedure, we highlight the criteria used below:

Counterparty profile: *number of associates; employees and collaborators; complexity of the internal hierarchy and number of departments, boards or sectors; use of intermediary agents as consultants or commercial representatives; sector of the market in which it operates; countries in which it operates, directly or indirectly; final beneficiaries; number and location of legal entities linked to the counterparty that are part of the same economic group; contractual relationship with Petrobras and other related data.*

Relationship with the government: *degree of influence of the public sector in the business of the counterparty and other companies of the same economic group, as well as the relationship of members of senior management and partners with public and political agents.*

Relationship with third parties: *use of intermediary agents as consultants or commercial representatives and/or other types of intermediaries, in order to raise new business with Petrobras, in Brazil or abroad.*

History and reputation: *history of involvement of the counterparty and other companies of the same economic group, as well as members of senior management and partners, in cases of ethical deviations, fraud, corruption, slave-like work, child labor and environmental crime.*

Integrity program: *Existence and application of mechanisms for prevention, detection and correction of irregularities and acts of corruption, compatible with the size of the company. The evaluation considers the parameters provided for in Art. 42 of Decree 8.420/15, which regulated Law 12.846/13, CGU Ordinance 909/15 and Interministerial Ordinance 2.279/15, as well as the Guide "Integrity Program: Guidelines for Private Companies " or, when applicable, the "Integrity for Small Business" Booklet, both published by the Office of the Comptroller General (CGU), and other national and international guidelines and practices.*

The following describes what types of documents and information are expected to demonstrate the existence and application of the elements of your company's integrity program:

1. Standards of conduct, code of ethics, integrity policies and procedures, applicable to all employees and administrators, when necessary, extended to third parties, such as suppliers, service providers, intermediary agents and associates (art. 42, II and III).

The Code of Ethics and/or Conduct is expected to declare the Company's values and principles related to ethics and integrity, define permitted and prohibited conduct, prohibit the practice of fraud and corruption, provide for disciplinary measures for non-compliance with ethical standards, including the Code of Ethics/Conduct.

Employees are considered good practices to periodically attest that they are aware and agree with the Integrity Policy, with the Code of Conduct, assuming the commitment to act in accordance with its precepts, as well as the Code of Conduct and the Integrity Policy (when applicable) to be reviewed and updated periodically to reflect changes in laws and regulations.

The Code of Conduct should explain the organization's commitment to:

- a) fully comply with applicable laws and/or regulations;*
- b) combat corruption, cartel, fraud, money laundering, illegal bidding and competitive processes and any other act against the Public Administration, either by its employees or by third parties acting on its behalf;*
- c) prohibit retaliation of any kind;*
- d) avoid conflicts of interest;*
- e) avoid facilitation payments;*
- f) ensure confidentiality in the treatment of privileged information and strategic information, as well as to comply with information security standards;*
- g) encourage people to report acts or attitudes that are contrary to the code of the organization's conduct.*

2. Training program or communication plan for its workforce, including Senior Management (art. 42, IV).

The training program aims to disseminate the ethical conduct and internal procedures to combat fraud and corruption maintained by the company. Periodic training can be evidenced by means of a document that declares the plan of dissemination of the integrity program and by evidence of the audience and assimilation of the content presented.

Evidence such as the annual training/communication program containing objectives, target audience, schedules, applied didactic material, learning verification tests, formal statements of agreement and knowledge of the transmitted content, campaigns to disseminate the integrity program, attendance lists and presentations made, communication of the company's senior management with the workforce, images captured from the computer screen, etc., may be shared.

3. Channels for reporting irregularities, open and widely disclosed to employees and third parties, and mechanisms for the protection of whistleblowers in good faith (art. 42, X).

Preferably open reporting channels (employees and third parties), available on the company's website, widely disseminated and guaranteed the confidentiality and anonymity of the complainant. Commitment and prohibition of non-retaliation widely declared by senior management.

Evidence may be shared such as the existence of statistics on receipt of allegations, policies, internal regulations, meeting minutes, discharge reports administration and evidence of the existence of communication channels to receive allegations of ethical deviations.

4. Internal investigation procedures aimed at investigating cases of fraud and corruption and the application of sanctions (art. 42, XII).

Clear investigation procedures provided for in the integrity program, as well as the disciplinary regime of the company. Carrying out these procedures with independence and presentation of quantifiable results. Results of the investigation process taken into account for the improvement of internal controls and for the application of sanctions in proportion to the ethical deviation evidenced.

Evidence such as policies, internal regulations, meeting minutes, reports to senior management, reports and statistics of investigation of suspected fraud and/or corruption, etc., may be shared.

5. Integrity Due Diligence Procedures in the relationship with its suppliers, agents, intermediaries, business partners or other counterparties (art. 42, XIII).

The Due Diligence procedure must be supported by an internal policy or regulation and capable of producing quantifiable results. The policy/standard of the procedure and the citation of business not established due to Due Diligence are possible evidence of effectiveness.

Evidence such as statistics on the application of the procedure, policies, internal regulations, third-party due diligence reports, etc.

The GRI is calculated by the weighting between the identified risk factors and the documentary evidence of the existence and application of integrity procedures maintained by the counterparty. The GRI result may be low, medium or high, as shown in the following table:

	Company without factors of identified risks	Companies with factors of identified risks
Evidence of existence and application of integrity mechanisms	Low GRI	Medium GRI
Evidence of existence without evidence of application of integrity mechanisms	Low or Medium GRI (depending on the profile)	Medium or High GRI (depending on factors of risks + profile)
There is no evidence to demonstrate the existence of integrity mechanisms	Medium GRI	GRI High

During the DDI procedure, depending on the need for further clarification on the risk factors and elements of the integrity program, the area responsible for the DDI procedure at Petrobras - Compliance, may contact the professionals indicated by the counterparty for issues related to Compliance. Thus, it is essential that in completing the DDI questionnaire, the counterparts indicate the name, email and telephone number of the professional responsible to meet Petrobras in case of doubts.

It is important to note that all personal data collected and processed within the scope of the questionnaire and the IDD procedure, in order to comply with a legal obligation, are used exclusively for the evaluation of the integrity criterion.

This data is stored and processed by Petrobras in a secure manner, considering the nature of the information processed, the specific characteristics of the processing and the current state of the technology, in the form of the General Personal Data Protection Law (LGPD) - Law 13.709/2018.

The contact of the data controller at Petrobras and the information on how the holders can exercise their rights can be obtained at:

<https://petrobras.com.br/pt/privacidade-e-protecao-de-dados-pessoais/?q=protecao-de-dados-pessoais>.