

Transpetro Ethical Conduct Guide for Third Parties

foreword

Petrobras Transporte S.A. – TRANSPETRO strives for excellency in the execution of its activities and has as one of its pillars the construction of healthy, transparent, sustainable and safe relations, believing in its role of acting as a true driving force of integrity in the Brazilian corporate environment.

The company identifies itself with companies that meet expectations concerning respect to its values and that interact in order to improve performance and competitivity.

In this context, the present document contains the principles, values and guidelines that guide the relation between Transpetro and its third parties, reflecting the Company's high integrity standards and what it expects from its supply chain.

Transpetro believes that the observance of the guidance contained in this document will lead to a more transparent management, strengthened mutual trust, and quality and credibility to business, thus contributing for the country's economic and social development reinforcing its commitment to ethics, transparency and respect to human rights and the environment.

TRANSPETRO PURPOSE

To provide logistics solutions for the oil, gas, and low-carbon products segments, contributing to human and social development in an ethical, fair, safe, and competitive manner.

TRANSPETRO VISION

To be the best logistics company in Latin America for the oil, gas, and low-carbon products segments, operating in an integrated manner with Petrobras, generating value through sustainability, safety, respect for the environment, and total attention to people.

TRANSPETRO VALUES

- *Caring for people*
- *Integrity*
- *Sustainability*
- *Innovation*
- *Commitment with Transpetro, Petrobras and Brazil.*

index

1. INTRODUCTION 05

2. TO WHON IT APPLIES 05

3. ETHICS AND INTEGRITY 05

3.1. Prevention of fraud, corruption, money laundering and terrorism financing 05

3.2. Integrity and transparency in relations 06

3.3. Prevention of conflicts of interest 06

3.4. Gifts, handouts, hospitality and sponsorship considerations to Transpetro employees or contractors 06

3.5. Competitivity in contracting processes 06

3.6. *Integrity Due Diligence (IDD)* 07

4. BIDDING PROCESSES, NEGOTIATIONS AND DEALINGS 07

5. EXECUTION OF CONTRACTS AND JURIDICAL INSTRUMENTS 07

6. OPERATIONAL EXCELLENCY COMMITMENTS 08

7. PERSONAL DATA AND CORPORATE INFORMATION PROTECTION 08

7.1. Personal data protection 08

7.2. Corporate information protection 08

8. HUMAN RIGHTS AND LEGAL COMPLIANCE 09

8.1. Working conditions, freedom of association, and collective bargaining 09

8.2. Diversity 09

8.3. Gender equity 09

8.4. Racial equality 09

8.5. Inclusion of people with disabilities 10

8.6. Child, slave labor or labor analogous to slavery, including forced labor, and fighting child and adolescent sexual exploitation 10

9. HEALTH, ENVIRONMENT, WORK SAFETY AND CLIMATE CHANGE MITIGATION 10

10. COMMUNITY RELATIONS 11

11. SOCIAL NETWORK ACTIVITY 11

12. AGREEMENTS, TREATIES AND CONVENTIONS 11

13. OMBUDSPERSON OFFICE 12

14. AUDITS AND EVALUATIONS 12

15. COMPLEMENTARY DISPOSITIONS 12

1. Introduction

The respect to life, to people and to the environment, integrity, transparence, meritocracy, and value generation are the principles supporting the guidance of this Ethical Conduct Guide for Third Parties ("Guide").

Transpetro is committed to the highest integrity standards, social and environmental responsibility, and ethical conduct. Our suppliers must offer safe working conditions, treating their workers with dignity and respect, acting in an ethical and righteous way, observing the principles and requirements of this Guide and be fully compliant with the applicable laws and regulations.

The observance of this Guide for all suppliers is crucial for Transpetro in order for it to achieve its goals in an ethical and transparent way.

2. To whom it applies

This guide applies to all suppliers, regardless of whether or not they reside in Brazil – including their colligated and controlled companies – who may be involved in business processes with Transpetro such as: public tenders, prequalifications and direct contracting procedures, as well as those who sign juridical instruments with Transpetro due to such processes, regardless of whether it concerns a contract, partnership, cooperation term or other instruments.

3. Ethics and integrity

3.1. Prevention to fraud, corruption, money laundering and terrorism financing

Transpetro is committed to the promotion of integrity in the public and private business environment and acts in compliance with the national and international Anticorruption Legislation and other applicable norms, especially the Brazilian Administrative Impropriety Law, the Brazilian Business Anticorruption Law, the FCPA – Foreign Corrupt Practices Act (USA) and the UK Anti-Bribery Act, signing initiatives in fighting corruption both in Brazil and abroad.

In this sense, according to the provisions in its Ethical Conduct Code, Transpetro adopts a zero-tolerance policy to all forms of fraud and corruption, including bribery, extorsion, money laundering and insider trading, throughout its entire supply chain. Therefore, all suppliers are absolutely forbidden to, demanding a similar stance from its (sub)suppliers:

a. *Request, obtain, receive, promise, offer or grant undue advantages of any kind for oneself or third parties, including facilitation payments;*

b. *Induce or persuade others to act in an improper or illegal manner in favor of Transpetro;*

c. *Failing to act concerning any form of fraud and corruption (national or transnational) situations of any kind, directly or indirectly, actively or passively, involving monetary values or not;*

d. *Finance, fund, sponsor, or, in any way, subsidize the practice of illicit acts;*

e. *Using resources, assets, contractual arrangements, or business relationships to*

finance, support, or facilitate the activities of criminal organizations. The identification of relevant evidence indicating a supplier's involvement in such activities may give rise to an integrity assessment, the adoption of preventive measures, and, depending on the severity of the facts, the available evidence, and the applicable legal and contractual provisions, the suspension or termination of the business relationship.

f. *Adopting any initiative with the public sector, whether in Brazil or abroad, which may be interpreted as influence peddling and as a harmful act to the public administration, described in Art. 5 of Federal Law n. 12.846, from 2013.*

3.2. Integrity and transparency in relations

Suppliers must, demanding a similar stance from its (sub)suppliers:

a. *Act with integrity, honesty, innovation, cooperation, trust, responsibility, continuous improvement, tangible results, reputation and transparency;*

b. *Adopt a transparent, truthful, easily comprehensible communication accessible to all interested parties, in all business relations with Transpetro, always observing questions concerning information security;*

c. *Report in the Transpetro Reporting Channel, in a timely, reasonable, responsible and honest manner any misconduct which they find.*

3.3. Prevention of conflicts of interest

The conflicts of interest, provisioned in Federal Law n. 12.813/2013, are harmful to Transpetro's business and to the internal control environment, as it may influence in an improper way the conduct of our employees by seeking particular interests contrary to Transpetro's interests, or even causing any type of damage to Transpetro and its societal participations.

It is the suppliers' duty to, demanding a similar stance from its (sub)suppliers:

a. *Abstain from practicing any action that might put Transpetro's employees or public agents from other public institutions and bodies in a real or potential conflict of interest;*

b. *Act diligently to prevent or stop any real or potential conflict of interest;*

c. *Communicate any type of particular relation between suppliers and Transpetro employees that may act in the supply relation, such as kinship between the supplier and its employees with Transpetro's employees and its administrators.*

3.4. Gifts, handouts, hospitality and sponsorship considerations to Transpetro employees or contractors

The occasional receiving or offering of gifts, handouts or hospitality must observe the strict law provisions, Transpetro's internal norms, in addition to normative acts emanating from public authorities, as it has the potential to represent an opportunity for fraud and corruption. Thus, such practices in exchange for any personal benefit or advantage to the proponent or third parties are forbidden.

3.5. Competitivity in contracting processes

Transpetro observes, in its action in the economic segment, the principles of free initiative and free competition, and, at the same time, does not condone any practices that may seek cartelization or

market concentration, which it deems absolutely incompatible with the economic order established by the Brazilian Constitution.

Public tenders held and contracts signed by the Transpetro within the scope of the Law 13.303/16 seek to ensure the selection of the most advantageous proposal, including in which it concerns the object's life cycle, and avoiding operations in which overpricing and overbilling are characterized, and they must observe the principles of legality, impersonality, morality, equality, publicness, efficiency, administrative propriety, cost-effectiveness, national sustainable development, entailment to the summoning instrument, competitivity gains and objective judgement.

Therefore, no behaviors at odds with the applicable legal norms and the referred principles will be tolerated.

3.6. Integrity Due Diligence (IDD)

Transpetro adopts the Integrity Due Diligence (IDD) procedure to subsidize decision making on the start or continuity of the commercial relation and for defining the monitoring level of identified potential fraud and corruption risks.

In order to meet the Integrity criterium, suppliers must make available information on their organizational and business structure, public agent relationships, integrity history, relationships with third parties and an integrity program. This information substantiates the IDD procedure, the result of which is the attribution of an Integrity Risk Degree (local acronym is "GRI").

4. Bidding processes, negotiations and dealings

The suppliers must:

a. *Certify that the proposal fully meets the demanded requirements in the contracting process, presenting all the required documentation, including the confirmation of meeting the habilitation requirements and conditions for signing the juridical instrument, under penalty of the applicable sanctions and penalties;*

b. *Commit to proposals and declarations sent to Transpetro dua to business proposals, with no abandonment possible, except for a justifiable reason, arising from a posterior event and accepted by Transpetro;*

c. *Certifying that the dealings with Transpetro are made with legal representatives or professionals carrying the supplier's functional identification examples: badges, the company's official electronic address, etc.).*

5. Execution of contracts and juridical instruments

Suppliers hired by Transpetro must:

a. *Execute the juridical instrument according to the law and its clauses and conditions, observing this Guide and other applicable norms;*

b. *Sharing our commitment, demanding a similar stance from its (sub) suppliers, to value generation in an ethical and*

transparent way, adopting the market's best practices;

c. *Using in an adequate way, according to the industry's good practice and terms contained in the juridical instrument, Transpetro's goods, products and/or facilities granted for execution of its activities.*

6. Operational excellency commitments

Transpetro aims permanently at excellency in the execution of its activities and, therefore, expects the same commitment from its suppliers.

The performance of its suppliers may be monitored through indicators related terms, quality, management, and safety, environment, health (SMS – Saúde, Meio-ambiente, Segurança), integrity, and contractual compliance. The results may support improvement initiatives and procurement decisions, in accordance with applicable regulations.

7. Personal data and corporate information protection

7.1. Personal data protection

It is the supplier's duty, demanding a similar stance from its (sub)suppliers, to guarantee its compliance with the provisions of the current privacy and data protection legislation, especially Law n. 13.709/18 (LGPD) as well as observing norms, guidelines, and Transpetro privacy and personal data protection policies.

Therefore, it is the duty of all its collaborators to:

a. *Have an exact understanding that the treatment of personal data is only allowed for specific, defined and legitimate ends, provided in one of the legal hypotheses described in article 7 or 11 of the LGPD and other current legislation on personal data protection;*

b. *Verify which of the personal data are really necessary for its activity before collecting them, accessing them, using them, storing them, divulging them or performing any sort of treatment provisioned in art. 5, X of LGDP;*

c. *Not share access passwords with third parties or using third party passwords for accessing corporate systems or computers;*

d. *When using Transpetro's equipment and resources, there should be no expectation of privacy, with Transpetro being able to have access to the content produced or circulated in them, as long as within the grounds of the current legislation.*

7.2. Corporate information protection

The supplier, demanding a similar stance from its (sub)suppliers, must comply the internal norms of Transpetro on information security, giving the adequate treatment to information received or generated due to the juridical relation established with Transpetro, keeping its collaborators informed about such internal norms, and reporting to Transpetro the cases of infringement of said norms.

8. Human rights and legal compliance

The suppliers, demanding a similar stance from its (sub)suppliers, commit to:

a. *Respecting fundamental human rights, according to the provisions of the International Human Rights Charter, the International Labor Organization Declaration on the Fundamental Rights and Principles of Labor, the UN Guiding Principles on Companies and Human Rights ("Guiding Principles") and other applicable national and international regulations;*

b. *Communicating the surrounding communities about activities affecting their daily life, so as to minimize impacts/risks, disturbances and conflicts arising from the execution of their relation with Transpetro;*

c. *Offer reparations to communities for damages arising from its activities;*

d. *Not performing acts that characterize excessive force in interactions between security personnel, communities and workers.*

8.1. Work conditions, freedom of association, and collective bargaining

The supplier must provide decent work conditions to its employees, ensuring compliance with the labor legislation of each country, committing to freedom of association and the effective recognition of the right to collective bargaining, demanding a similar stance from its (sub)suppliers. In countries where the current legislation is less protective than international law, the latter's standards apply.

The supplier must also take action against acts of prejudice, threat, blackmail, libel, moral and sexual harassment.

8.2. Diversity

Honesty, integrity, justice, equity, truth and coherence between practice and discourse guide the relations of Transpetro with people and institutions, and manifest themselves concerning the differences and diversity of ethnical, religious, social, cultural, linguistic, political, aesthetic, physical, mental, psychic, sexual orientation, gender identity, age and gender conditions, among others.

Therefore, the supplier commits to promote diversity, ensuring respect to differences and equality of access opportunities, remuneration and professional ascension, while also demanding a similar stance from its (sub) suppliers.

8.3. Gender equity

The supplier must promote the validation of gender equity, ensuring non-discrimination in labor relations and contributing to effective participation of women in their social and economic activities and in leadership positions, respecting differences and ensuring equality of rights and opportunities between genders, while also demanding a similar stance from its (sub)suppliers.

8.4. Racial equality

The supplier must validate racial equality initiatives to contribute with more fair labor relations and with opportunity equality for

people from ethnical-racial strata in a vulnerability situation, contributing to amplify representation in their social and economic activities and in leadership positions, while also demanding a similar stance from its (sub)suppliers.

8.5. Inclusion of people with disabilities

Every person with disabilities has the right to equal opportunities with other people and will not suffer any form of discrimination. Thus, the supplier must contribute to the actualization of work opportunity equality including, as much as possible or according to the legal provisions, people with disabilities in its workforce, promoting, equally, the exercise of their fundamental rights and liberties, seeking social inclusion and effective citizenship, while also demanding a similar stance from its (sub)suppliers.

8.6. Child, slave labor or labor analogous to slavery, including forced labor, and fighting child and adolescent sexual exploitation

The supplier, while also demanding a similar stance from its (sub)suppliers, commits to:

a. *Not using child labor, according to the provisions of section XXXIII of article 7 of the Brazilian Republic Constitution, nor using a workforce in conditions of slavery or analogous to slavery, including forced labor, demanding the same posture from its own suppliers and contractors, under penalty of the applicable sanctions;*

b. *Not practicing and/or condoning any form of sexual exploitation of children and adolescents, making their employees aware for facing such violence and publicizing, whenever possible, the local reporting channels, especially the Municipal Child Protection Councils and Human Rights Helpline (Disque Direitos Humanos) – Dial 100.*

9. Health, environment, work safety and climate change mitigation

The supplier, its employees and subcontractors, engaged in caring about life, the environment and promoting safe and ethical behavior, committing, while also demanding a similar stance from its (sub)suppliers, to:

a. *Reducing risks to safety and health and strengthening safety of processes;*

b. *Caring about one another in work environment and, in doubt, stop and seeking help;*

c. *Fostering protagonism in continuously improving safety, health and wellbeing;*

d. *Preventing and mitigating environmental impacts arising from its activities and products, seeking improvement in environmental quality pollution prevention, and proper waste management;*

e. *Ensuring the origin traceability of wood directly or indirectly used in the execution of its activities, in order to certify its production is ecologically adequate, socially fair and economically viable;*

f. *Preventing, monitoring and controlling the impacts of their activities on the communities where they act;*

g. *Consider the specific HSE requirements established for their activities;*

h. *Bolstering the HSE and Climate change mitigation culture by focusing in education, training, awareness raising and shared learning and experience;*

i. *Communicating HSE and Climate change mitigation information and performance in a transparent way;*

j. *Seeking alignment with industry HSE and Climate change mitigation good practices, complying with legislation, standards, norms and ordinances, including the efficient and responsible use of natural resources, the reduction of greenhouse gas emissions, and the reduction of energy consumption, as well as Transpetro's sustainability commitments and its zero fatalities, zero leak goal;*

k. *Anticipating and responding swiftly to emergency situations;*

l. *Continually implementing improvements in HSE and Climate change mitigation.*

m. *Fostering actions for the conservation, restoration, and protection of the environment, including practices Against deforestation, biodiversity promotion, and the conservation of land and natural resources.*

10. Community relations

Each community possesses its own characteristics, defined from its history and social relations, represented by values, interaction forms and identity, all of which must be respected.

From these premises, Transpetro encourages the supplier to establish relationships with the communities situated in its service area, based on continuous and transparent dialogue, contributing to the viability of its activities and local development, while also demanding a similar stance from its (sub)suppliers.

11. Social network activity

The digital communication of the supplier must be conducted in accordance to the provisions of this Guide whenever it mentions Transpetro, and in accordance to the current legislation regarding intellectual property and the respective copy and use rights.

It is thus forbidden to:

a. *Create websites, pages or any application on Transpetro's behalf or in direct association with the brand;*

b. *Create profiles in social networks or communities on Transpetro' behalf;*

c. *Speake on behalf of Transpetro, behaving as a speaker for it in the digital environment without due authorization/designation.*

12. Agreements, treaties and conventions

Transpetro supports suppliers in initiatives the seek compliance with agreements, treaties and international conventions in matters concerned by this Guide, among them, the United Nations Universal Declaration of Human Rights, the Business Pact for Integrity and Against Corruption, and the Oil, Gas and Biofuel Industry Integrity Pact, and the International Labor Organization (ILO) guidelines.

13. Ombudsperson Office

It is the duty of all to protect Transpetro from any and every infringement that they find, even it is only suspicious conduct. Therefore, situations that might characterize non-compliance must be reported in the Transpetro Reporting Channel, in a timely, honest, reasonable and responsible manner, detailing attitudes or practices that do not observe this Guide's guidelines, the Company's internal norms or the legislation.

Transpetro makes available safe and reliable communication channels, including an external and independent Reporting Channel, comprehending its controlled companies, and possesses security mechanisms in order to ensure the reporting person's anonymity and allows them to accompany its' report progress.

The Reporting Channel can be accessed by the address:
https://www.contatoseguro.com.br/petrobras
For telephone calls, there are the following numbers: 0800 601 6925

14. Audits and Evaluations

The supplier, while also demanding a similar stance from its (sub)suppliers, commits to cooperate and aid audit, verification and investigation processes conducted by Transpetro or a designated third party concerning any alleged, suspected or proven non-compliance whether with the applicable national and international, whether in relation to its contractual obligations concerning Transpetro.

The supplier, while also demanding a similar stance from its (sub)suppliers, must make the necessary efforts in order to correct eventual shortcomings or violations identified by an audit, evaluation, inspection, investigation, or external or internal analysis.

15. Complementary dispositions

Non-compliance with these principles and commitments expressed in this Guide may imply adoption of measures by Transpetro, such as the imposition of the penalties and other contractual consequences, as well as administrative sanctions, which may culminate in the barring of the supplier from new contracts and even the termination of current contracts, according to Transpetro's norms.

Regarding administrative sanctions, examples of conducts subject to scrutiny by a specific commission, according to Transpetro's norms, are: fraud, corruption or deliberate conduct from the company; abandonment or unilateral denouncing of the contract; occurrence of HSE accidents, whether or not fatal; non-compliance with labor or social security obligations; the unjustified proposal withdrawal by the bidder, among others considered relevant to Transpetro, according to the seriousness of the harmful conduct or company behavior, or its effects.


TRANSPETRO