

2022



PETROCOQUE

**PETROCOQUE COMPLIANCE
AND ANTI-CORRUPTION
POLICY**

[Logo: **PETROCOQUE**]

== Uso Público Petrocoque ==

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1. Objective

Petrocoque's Compliance and Anti-Corruption Policy ("Policy") aims to consolidate guidelines and principles that must direct the actions of its managers and employees and substantiate their relationships with each other and between them and their shareholders, suppliers, competitors, governments, communities, other stakeholders and society in general.

2. Application

This Policy applies to Petrocoque as a whole, and to any activities managed or conducted on behalf of Petrocoque by Third-Party Intermediaries. Every Employee must become familiar with this Policy and comply with it. This Policy also applies to agents, representatives, consultants, service providers and other Third Party Intermediaries hired by Petrocoque.

3. Principles

- We have a responsibility to ensure that Petrocoque's reputation is protected and enhanced.
- We are aware that misconduct, whether by action, omission or complacency, harms society, violates the laws and harms Petrocoque's image.
- We are committed to promoting elevated ethical values, integrity and transparency when conducting our business activities, with zero tolerance for fraud, corruption and money laundering, cultivating credibility with our stakeholders and continuously encouraging proper actions towards compliance with the applicable laws and initiatives to combat fraud, corruption and money laundering to which it is a signatory.
- We do not tolerate misconduct or any type of violation or non-compliance with legal obligations, in particular Law 12.846/20131, and/or internal policies and rules.

What is COMPLIANCE?

Compliance means "to agree" and describes the ability to act in accordance with a command, set of rules or requirements, which can be external (Law, Rules and Regulations), or, internal (Policies, Rules, Procedures), which aim to prevent or mitigate the risk of violating the rules and regulations applicable to the Company's activities, and which, in the event of non-compliance, may generate sanctions, financial loss and damage to Petrocoque's reputation/image.

In addition, it means reporting concerns and making sure that suspicious behaviour does not go unchallenged, and encouraging others to do the same.

4. Guidelines

The guidelines that are assumed in this Policy must be practiced in a convincing, responsible and unrestricted manner:

- Conduct business in an ethical manner and with absolute integrity.
- Decline business whenever unethical or illegal situations are identified.
- Act in Petrocoque's best interests, avoiding activities that may create a real conflict of interest or that may be perceived as improper actions from the standpoint of business relations.
- Report concerns and make sure that suspicious behaviour does not go unchallenged, act accordingly and encourage others to do the same.
- Promote the strengthening of a sound common sense, the perception of potential compliance risks and the determination to act when necessary.
- Promote compliance and adherence to applicable legislation and regulations in force, especially the Anti-Corruption Law.
- Strengthen and disseminate the culture of internal controls, ensuring compliance, adequacy and alignment of policies and internal instruments with applicable legislation, paying special attention to the guidelines established in accordance with to the General Law for the Protection of Personal Data.
- Act preventively, seeking to avoid risks of losses, fraud, and to combat possible actions of corruption and bribery or conduct that may cause material damage and harm to the Company's image.

¹Law 12.846/13, which provides for the objective administrative and civil liability of legal entities for the practice of infractions against public, national or foreign administration, duly regulated by Federal Decree No. 8.420/2015, issued on 15 March 2015, which is presented in full on the Intranet, as an appendix to this Policy.

5. What is expected from each of us?

Individual Responsibility of Employees:

- Each employee is responsible for ensuring Compliance in all obligations associated with their role's activities, including identifying, managing and reporting any Compliance violations.
- Petrocoque employees must set a good example and, moreover, take measures to ensure that all others conduct their activities ethically and in accordance with legal and regulatory specifications.
- Everyone must obey the laws, and the internal regulations when working for Petrocoque.
- It is the obligation of every Petrocoque employee to be fully aware of the Code of Conduct and Ethics. Employees must participate in all planned Compliance education and training activities.

Compliance is the responsibility of all Petrocoque Employees, regardless of their positions within the Company.

We are all Compliance agents and therefore must act in accordance with the laws and regulations applicable to the scope of our duties, as well as follow Petrocoque's Code of Conduct and Ethics, Values and Beliefs.

Leadership responsibility:

- Implement and ensure adherence to the Compliance Policy.
- Review its business practices periodically and, if they are inconsistent with this Policy in any way, make the appropriate adjustments to practices and thereby, ensure compliance.
- Reinforce and encourage your team's commitment to Compliance.
- Ensure that your teams are trained in this Policy's procedures.
- Ensure that the Intermediate Third Parties with whom they interact fully understand and follow this Policy and related procedures in their activities with Petrocoque.

6. Sanctions

Petrocoque and/or its Employees may be investigated by state regulatory bodies in different jurisdictions and, depending on the circumstances, prosecuted administratively, civilly or criminally. This may result in severe fines and penalties, debarments and/or imprisonment if the Company and/or its Employees if they are found to be in violation of applicable anti-corruption and anti-bribery laws and/or regulations.

Any Employee who has any involvement insofar as violating this Policy will be subject to disciplinary measures, which may include termination in accordance with applicable laws and company policies.

Agents, consultants and other Third-Party Intermediaries who work for Petrocoque and who are involved in the violation of this Policy will be subject to termination of their commercial relationship, as well as any other legal and reparative measures available to Petrocoque under the terms of applicable law.

7. Communication and Responsibilities

The Compliance Committee is responsible for ensuring that all directors, officers and employees are aware of this Policy.

The QHSE department is responsible for posting this document on the Company's Management system so that it becomes public and accessible to Company employees.

The Communication department is responsible for the overall disclosure of this Policy on all of the Company's available communication channels.

The Human Resources department is responsible for keeping the documentation that made all employees aware of this Policy.

The Hiring department must ensure that all Third-Party Intermediaries are aware of the content from this policy during the competitive hiring phase.

8. How to Ask Questions and Report Incidents or Concerns

It is the responsibility of all Employees to ensure compliance with this Policy. Petrocoque's Employees are encouraged to ask questions regarding this Policy to its Compliance Committee at comitedeconformidade@petrocoque.com.br.

Even if requested to do so by their line manager, the Employee may not engage in any conduct contrary to this Policy if this occurs, they shall access the Reporting Channel in use at the time. Reprisals will not be tolerated for those who report any acts that have occurred.

Any and all Employees or Third-Party Intermediaries must immediately report any attempt at bribery, solicitation or offer of improper payment or advantage, through the current Reporting Channel in use by Petrocoque.

9. Non-Retaliation

Regardless of the alleged misconduct reported, or the method of reporting, Petrocoque will not tolerate retaliation against any person who gives any information about an alleged violation of the Code of Conduct, Ethics and Compliance from this Policy, other applicable policies, or applicable laws and regulations, regardless of the results of the Company's investigation of the allegation(s).

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Attachment I - Definitions

Shareholder: one who holds a part of the Company's capital, which is represented by their holdings.

Administrator: one who is responsible for deciding something within the Company.

Public Official: for the purposes of this Policy: (i) Any public official, servant or not, of the direct, indirect or foundational administration of any of the Powers from the Union, from the States, from the Federal District, from the Municipalities, Territory, from the company incorporated into public equity or entity for whose creation or funding the public treasury has competed or competes with more than 50% (fifty percent) of the equity or annual revenue; as well as any political party official, its employees or other persons acting for or on behalf of a political party or candidate for public office; (ii) Any public official who, even if temporarily or without remuneration, exercises a position, job or public office in a body, government agencies or in diplomatic representations of a foreign country, as well as in legal entities controlled, directly or indirectly, by the government of a foreign country or in public international organisations.

Improper Payment, "Facilitator", "Accelerator" or "Expediter": means • Any small or nominal payment made to a "Public Official", typically to expedite and/or secure the performance of a routine or non-discretionary "public action" and which is not provided by law. The Company prohibits such payments. By way of example, "public actions" may include the following: 1. Obtain permits, licenses or other official documents to qualify an individual or legal entity to conduct business in the country or abroad; 2. Process government paperwork, such as visas and work applications; 3. Provide police protection services, collection and delivery of correspondence, or schedule inspections; 4. Provide telephone services, supplying electricity and water, transporting cargo or protecting goods from deterioration, or 5. Actions of a similar nature.

Anything of Value: may include any item of monetary value, with the exception of a Giveaway, including, without limitation, cash or its equivalents (including gift cards); benefits and favours (such as special access to some state agency); provision of services that would otherwise have to be paid for or purchased; gifts; contracts or other business opportunities awarded to a company over which a "Public Official" has ownership or any legal right; employment or consulting opportunities; donations to charities; political contributions; medical, education or living expenses, except as provided in the Company's Donations Policy.

Third-Party Intermediary: means any natural person (other than an employee of Petrocoque) or legal entity contracted (formally or informally) by the Company to act for Petrocoque or on its behalf, regardless of the name or position of the natural person or legal entity.

This definition includes, without limitation to this extent, the following: Any natural person or legal entity used to obtain and/or retain business, such as agents, advisors, consultants, subcontractors, sales representatives and partners of a joint venture; • Any natural person or legal entity acting to ensure the obtaining of a licence, visa, permit or other form of authorisation from a “Public Official”, or intervening in a regulatory issue with a “Public Agent”; Any natural person or legal entity used to represent the Company or its interests before a government, a state entity, state-owned company or controlled by the State; • Any natural person or legal entity used to represent the Company in tax or legal matters; or • Any natural person or legal entity used to represent the Company in customs clearance processes.

Improper Advantage: covers any and all **Improper Payments** made in a business context, such as paying or giving **Anything of Value** to a **Public Official**, natural person or legal entity, directly or indirectly, to: influence or avoid government action, or any other action, such as the award of a contract, imposition of a tax or fine, or the cancellation of an existing contract or contractual obligation; obtain a licence, permit or other authorisation from a state entity or **Public Official** to which the Company would not be entitled; obtain confidential information about business opportunities, invitations for bids or competitors’ activities; influence the award of a contract; influence the termination of a contract that is not advantageous to the Company, or secure any other **Improper Advantage**.