

# INTEGRITY DUE DILIGENCE QUESTIONNAIRE

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Providing the information and documents required in this questionnaire is one of Petrobras' Integrity Due Diligence (IDD) steps. The IDD causes the Integrity Risk Level (IRL) to be assigned to suppliers, as provided for in § 2 of Article 4 of the Petrobras Bids and Contracts Regulation (PBCR) and criteria laid out in the Supplier Channel<sup>1</sup>.

We would like to observe that all the personal data collected and treated in connection with this questionnaire and the IDD procedure to fulfill a legal obligation are solely used to assess the integrity criterion.

Petrobras securely stored and treated those data by considering the nature of the information treated, the specific treatment characteristics, and the state of the art in conformity with the Brazilian Personal Data Protection Act (PDPA) - Law 13709/2018.

The contact of the person in charge of data at Petrobras and information on how the owners can exercise their rights can be access at <https://petrobras.com.br/pt/privacidade-e-protecao-de-dados-pessoais/?q=protecao-de-dados-pessoais>.

### **INFORMATION ACCURACY DECLARATION**

As a representative of the declaring company, I certify that, to the best of my knowledge, after the due checks, the information provided in the Integrity Due Diligence Questionnaire, including any other attachments, is accurate, complete, and up-to-date. I also declare that if I should become aware of any fact that may affect such information, such a fact will be promptly reported to Petrobras.

Signature:

Name in full:

Position:

E-mail:

Contact Telephone(s):

Date:

1. (<https://canalfornecedor.petrobras.com.br/pt/compliance/due-diligence-de-integridade/>).

## 1. Company Profile

1.1. Tax identification (e.g., CNPJ), company name, eventual classification as a micro or small business, assumed name, and previous names, as the case may be. **\*Please provide the company name and tax identification.**

1.2. Address of head office, branches, and representation offices in Brazil or overseas.

1.3. Number of employees.

1.4. Industry or segment of operation (e.g., oil and gas industry).

1.5. Primary business activity(ies) (e.g., vessel chartering).

1.6. Country where its operations are established.

1.7. Identification of member(s) or stockholder(s) and their percentage of stake in the company.

1.8. Identification of ultimate beneficiary(ies)<sup>2</sup>.

1.9. Identification of the senior management members<sup>3</sup>.

1.10. Organization chart of the business group's corporate structure.

1.11. Identification and contact information of the person in charge of treating personal data in conformity with the General Data Protection Act <sup>4</sup> (GDPA), if applicable to your company.

## 2. Relationship with government and political agents

2.1. Is any senior manager, member, or stockholder in your company related <sup>5</sup> to a Petrobras employee or a member of the Petrobras Executive Board or Board of Directors?

Yes                  No

If affirmative, provide the name and position of the employee/manager at your company, the name of the employee/manager at Petrobras, and the degree(s) of kinship.

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2. Ultimate beneficiary means i) a natural person who, in the last instance, directly or indirectly, significantly owns, controls, or influences the entity; ii) a natural person on behalf of whom a transaction is made. (Normative Instruction - Brazilian IRS No. 1863/2018).

3. Senior management means a company's highest hierarchical levels, people who have the highest strategic decision-making power, including, without limitation, the executive board and board of directors, if any.

4. Law 13709, dated August 14, 2018.

5. A spouse, life partner, or relative by blood or affinity, in a direct or collateral line, up to the third degree. (your parents, grandparents, great grandparents, children, grandchildren, great grandchildren, siblings, uncles/aunts, and nephews/nieces, and those of your spouse or life partner). (Law 12813/2013 – the Conflict of Interest Act).

2.2. Is (or was) a senior manager, executive, director or stockholder, including their relatives, a political agent<sup>6</sup>, or a government agent<sup>7</sup>?

Yes                      No

If affirmative, provide the name and position of the employee/manager at your company, name of the body or entity, title held, period in office, and degree of kinship.

### 3. History and sanctions

3.1. Has any employee, senior manager, executive, director, stockholder, agent, or a third party representing your company already been arrested, accused, investigated, sued, or convicted of fraud, corruption, administrative misconduct, money laundering, or terrorism financing; crimes against the public administration, environmental crimes; slave, forced, or child labor; rape, sexual harassment; or even violation of any domestic or foreign personal data protection law?

Yes                      No

If affirmative, explain the circumstances of the incident and provide the pertinent documentation.

3.2. Have your company or its controlled, parent, affiliated, or consortium companies already been accused, investigated, sued, or convicted of fraud, corruption, administrative misconduct, money laundering, or terrorism financing; crimes against the public administration, environmental crimes, slave, forced, or child labor; rape, sexual harassment; or even for violation of any domestic or foreign personal data protection law?

Yes                      No

If affirmative, explain the circumstances of the incident and provide the pertinent documentation.

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6. Consider Presidents, Ministers of State, or their equivalent at a state or local level, Governors, Mayors, and their respective deputies, Senators, federal and state Deputies, and Councilmembers.

7. A person who holds—even if temporarily or without pay, by election, appointment, designation, hiring, or any form of investiture or relationship—a term in office, position, employment, or public office in bodies or entities of the direct, indirect, or institutional administration of any of the Federal, State, Federal District, or Local Powers, in diplomatic representations, in legal entities directly or indirectly controlled by a foreign country's government or in international government organizations; incidentally, the Petrobras employees and officers are considered government agents.

#### 4. Intermediaries

4.1. Does your company use services from third parties, such as agents, consultants, business representatives, and/or other types of intermediaries, either people or companies, to do or maintain business with Petrobras?

Yes                      No

If affirmative, inform the personal name and/or corporate name of the agents, consultants, business representatives, and/or other types of intermediaries, either people or companies, describing, as applicable, which services are used in the dealings with Petrobras.

4.2. In the last 5 years, did your company subcontract third party(ies) within the scope of the execution of contract(s) within Petrobras?

Yes                      No

If yes, please list the service subjected to subcontracting and the subcontracted company(ies).

## 5. Integrity Mechanisms

5.1. Does your company have a Code of Conduct that lays down the conduct to be followed by all your employees, including senior managers and third parties, where applicable?

Yes      No

If affirmative, provide the documentary evidence supporting your affirmation or indicate how it can be accessed on your company's website.

5.2. Does your company give training and implement communication actions to disseminate the ethical conduct and internal procedures against fraud and corruption aimed at all your employees, including senior management?

Yes      No

If affirmative, provide the documentary evidence supporting your affirmation or indicate how it can be accessed on your company's website.

5.3. Does your company provide communication channels to report fraud, corruption, and/or violation of personal data that are widely disseminated to all employees and open to the public?

Yes      No

If affirmative, provide the documentary evidence supporting your affirmation or indicate how it can be accessed on your company's website.

5.4. Does your company have and use mechanisms to investigate evidence of fraud and/or corruption and/or violation of personal data?

Yes      No

If affirmative, provide the documentary evidence supporting your affirmation or indicate how it can be accessed on your company's website.

5.5. Does your company apply the proper risk-based diligences to hire and, as applicable, supervise third parties, such as suppliers, service providers, intermediary agents, brokers, consultants, business representatives, and associates?

Yes      No

If affirmative, provide the documentary evidence supporting your affirmation or indicate how it can be accessed on your company's website.

## 6. Human Rights

6.1. Is your company publicly committed to respecting, raising awareness, and advocating for Human Rights in conformity with the international treaties and conventions ratified by the Brazilian state<sup>8</sup>?

Yes                      No

If affirmative, provide the documentary evidence supporting your affirmation or indicate how it can be accessed on your company's website.

6.2. Does your company carry out periodic risk analyses to adopt and/or improve its in-house Human Rights violation prevention procedures and repair any potential impacts caused by its activities, including its supply chain?

Yes                      No

If affirmative, provide the documentary evidence supporting your affirmation or indicate how it can be accessed on your company's website.

6.3. Does your company have internal policies, guidelines, or procedures to respect, raise awareness, and advocate for Human Rights while undertaking its activities?

Yes                      No

If affirmative, provide the documentary evidence that supports your affirmation or, alternatively, indicate how it can be accessed on your company's website, and also inform which of the following topics are included in those documents:

- Practices against slave labor;
- Guarantee of the freedom of association and collective negotiation;
- Eradication of child labor, including the sexual exploitation of children and adolescents;
- Actions against moral or sexual harassment and any kind of discrimination;
- Promotion of diversity, equality, and inclusion.

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8. For example: International Letter of Human Rights and Declaration on Fundamental Principles and Rights at Work by the International Labor Organization (ILO).



**6.4. Does your company provide employees with Human Rights awareness activities and/or training?**

Yes      No

If affirmative, provide the documentary evidence that supports your affirmation or, alternatively, indicate how it can be accessed on your company's website, and also inform which of the following topics are included in those awareness activities and/or training:

- Practices against slave labor;
- Guarantee of the freedom of association and collective negotiation;
- Eradication of child labor, including the sexual exploitation of children and adolescents;
- Actions against moral or sexual harassment and any kind of discrimination;
- Promotion of diversity, equality, and inclusion.

**6.5. Does your company provide public communication channels to receive complaints and/or accounts of Human Rights violations of any kind, including discrimination and moral or sexual harassment?**

Yes      No

If affirmative, provide the documentary evidence supporting your affirmation or indicate how it can be accessed on your company's website.

**6.6. Does your company add clauses to its supplier contracts that contain Human Rights issues, including actions to prevent child and slave labor, promote diversity and inclusion, and fight moral, sexual harassment, and every kind of discrimination?**

Yes      No

If affirmative, provide the documentary evidence supporting your affirmation or indicate how it can be accessed on your company's website.

## 7. Personal Data Privacy and Protection

7.1. Does your company have internal policies, guidelines, or procedures to protect personal data and privacy with a focus on the GDPR?

Yes      No

If affirmative, provide the documentary evidence supporting your affirmation or indicate how it can be accessed on your company's website.

7.2. Does your company provide its employees and workers with awareness activities and/or training regarding personal data and privacy?

Yes      No

If affirmative, provide the documentary evidence supporting your affirmation or indicate how it can be accessed on your company's website.

7.3. Does your company provide a communication channel to handle demands from personal data owners that are widely disseminated to all employees and open to the public? ?

Yes      No

If affirmative, please inform us how this channel can be accessed.

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