## INTEGRITY DUE DILIGENCE

**QUESTIONNAIRE** 

The Integrity Due Diligence procedure (IDD) is part of Petrobras' Corruption Prevention Program (PCPP) and aims to assess the integrity risk to which Petrobras could be exposed in the relationship with its suppliers according to item XIII, of art. 42, of Chapter IV, of the Brazilian Decree 8,420/15 and aligned with international best practices.

The IDD is executed based on the analysis of information collected through the IDD questionnaire and searches, considering the profile, history, reputation and anti-corruption practices implemented by suppliers.

The DDI may result in the attribution of the Degree of Risk of Integrity (GRI), which can be High, Medium or Low, as per the provisions of paragraph 2, article 4 of the Regulation for Petrobras Bidding and Contracts (RLCP), and criteria described in the Supplier Channel

(https://canalfornecedor.petrobras.com.br/en/compliance/integrity-due-diligence/)

Therefore, in order to contribute to ethics and transparency in business, we kindly request your company to provide the information and documents required in this Integrity Due Diligence Questionnaire

We emphasize that all personal data collected and treated within the scope of this questionnaire and IDD procedure, to comply with legal obligation, are used exclusively for the integrity criteria evaluation.

These data are stored and treated by Petrobras in a secure manner, considering the nature of the information treated, the specific characteristics of the treatment and the current state of technology, as per requirement of the General Law of Protection of Personal Data (LGPD) - Law 13.709/2018.

Petrobras ´ data controller contact and information on how the data owners can exercise their rights can be obtained at https://petrobras.com.br/en/privacy-and-protection-of-personal-data/



## **CERTIFICATE**

As representative of the company, I certify that, to the best of my knowledge and after proper consultation, the information provided on this Integrity Due Diligence Questionnaire, including any attached documents is true, accurate, complete and up-to-date. I also certify that if we learn of any additional information that is relevant to this assessment, we will promptly report that information to Petrobras.

Signature:
Printed Name:
Position:
E-mail:
Phone:
Date:
1. COMPANY PROFILE
1.1. Fiscal Identification (CNPJ or foreign registration number if not registered in Brazil), possible qualification as a micro or small business, corporate name, trade name, and former names (if applicable).
1.2. Head office address, branches and representation offices in Brazil and abroad.
1.3. Number of employees.
1.4. Industry or activity sector (e.g. oil and gas industry).
1.5. Main activity (ies) of your business (e.g. chartering).



1.6.	Countries	in which	the comp	anv develo	ps its activities.
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- 1.7. Name(s) of partner(s) or shareholder(s) and their percentage(s) of ownership interest in the company.
- 1.8. Name(s) of the ultimate beneficiary (ies)1.
- 1.9. Names of the top-level management team<sup>2</sup>.
- 1.10. Corporate name, trade name and Fiscal identification number of the parent company (ies).
- 1.11. Corporate name, trade name and Fiscal identification number of the controlled company (ies).
- 1.12. Corporate name, trade name and Fiscal identification number of the affiliated company (ies).
- 1.13. Corporate name, trade name and Fiscal identification number of consortium company (ies).
- 1.14. Ownership Structure Chart.

<sup>2</sup> Top-level management is considered the highest hierarchical levels of the company. Occupying positions with high-level decision-making power at the strategic level, and even the board of directors, if applicable.



<sup>1</sup> Ultimate beneficiary is considered: i) the natural person who ultimately, directly or indirectly, owns controls or significantly influences the entity; ii) the natural person on behalf of whom a transaction is conducted. (Instrução Normativa Receita Federal do Brasil Nº 1863/2018).

## 2. RELATIONSHIP WITH ELECTED, GOVERNMENT AND PUBLIC OFFICIALS

2.1. Does any member of your top-level management team, partner or shareholders has a family relationship <sup>3</sup> with any Petrobras' employee who holds a managerial <sup>4</sup> position or a member of Petrobras' Top Management?
( ) Yes ( ) No
If affirmative, please provide details (name and position of your company's team member and name of the Petrobras´ employee and family relationship status).
2.2. Is or have any member of the top-level management team, including their family members, been a political agent <sup>5</sup> ?
( ) Yes ( ) No
If affirmative, please provide details (name and position of your company's team member, degree of kinship, name of the body or entity, position held, time period he/she held the position).
2.3. Is or have any member of the top management team, partner or shareholder, including their family members been a public agent?
( ) Yes ( ) No
If affirmative, please provide details (name and position of your company's team member, degree of kinship, name of the body or entity, position held, time period he/she held the position).

<sup>6</sup> Those who exercise - even if temporarily or without remuneration, by election, appointment, designation, contracting or any other form of investiture or connection - a mandate, position, job, or public function in government agencies, state owned entities or diplomatic representations, in legal entities controlled directly or indirectly by the national public power or by a foreign country, or in public international organizations.



<sup>3</sup> Spouse, partner or relative, by consanguinity or affinity, in a direct or collateral line, up to the third degree (your parents, grandparents, great-grandparents, children, grandchildren, great-grandchildren, brothers, uncles and nephews, as well as those of your spouse or partner. (Law 12,813/2013 - Conflict of Interest Law).

<sup>4</sup> Such as Supervisor, Coordinator, Sector Manager, Manager, General Manager, Executive Manager.

<sup>5</sup> Such as the President, Ministers of State, or their equivalent at the state and municipal level, Governors, Mayors and their vice-presidents, Senators, Federal and State Representatives, and City Councilors.

**<sup>7</sup>** Órgãos ou entidades da administração direta, indireta ou fundacional de qualquer dos Poderes da União, dos Estados, do Distrito Federal e dos Municípios, representações diplomáticas, pessoas jurídicas controladas, direta ou indiretamente pelo poder público de país estrangeiro, ou em organizações públicas internacionais.



3.2. Has your company, its parent companies, subsidiaries, affiliates or consortiums ever been accused, investigated, prosecuted or convicted for fraud, corruption, administrative improbity, money laundering, crime against the public administration, environmental crime or for work analogous to slavery, forced or child labor?
( ) Yes ( ) No
If affirmative, please explain the circumstances of the fact and provide pertinent documentation.
3.3. Has your company, any controlling, controlled, associated or consorted company, or any employee, member of top management, partner or shareholder ever suffered any type of sanction that implied the restriction to bidding and contracting with the Public Administration, or that was related to the practice of illicit acts?
( ) Yes ( ) No
If affirmative, please explain the circumstances of the fact and provide pertinent documentation.
4. INTERMEDIARIES
4.1. Does your company use the services of third parties, such as agents, consultants, commercial representatives and/or other types of intermediaries, whether individuals or legal entities, with the purpose of developing new business locally or in other countries?
( ) Yes ( ) No
If affirmative, please provide name and/or corporate name of the agents, consultants, commercia representatives and/or other types of intermediaries, whether individuals or legal entities.



4.2. Does your company use the services of third parties, such as agents, consultants, commercial representatives and/or other types of intermediaries, whether individuals or legal entities, with the objective of securing new business or maintaining business with Petrobras?
( ) Yes ( ) No
If affirmative, please provide name and/or corporate name of the agents, consultants, commercial representatives and/or other types of intermediaries, whether individuals or legal entities.
5. ETHICS AND COMPLIANCE PROGRAM
5.1. Does your company have a Code of Ethics, Conduct Guide or related documents that describe the ethical conducts which must be observed by all of its employees, including members of top management and, when applicable, outsourced and third parties personnel?
( ) Yes ( ) No
If affirmative, please provide a copy of the supporting documentation, or alternatively inform where such documents may be found in your website.
6. ETHICS AND COMPLIANCE PROGRAM
6.1. Does your top-level management team carry out actions that demonstrate its commitment and support to ethical culture and zero tolerance to acts of fraucand corruption?
( ) Yes ( ) No
If affirmative, please provide evidence to support the answer.



6.2. Does your company perform periodic risk assessment in order to elaborate and/or improve its internal mechanisms and procedures for prevention and detection of ethical deviations, fraud, corruption and other illicit acts?
( ) Yes ( ) No
If affirmative, please provide evidence to support the answer.
6.3. Does your company conducts training and/or internal communication to disseminate the ethical conduct and procedures to combat fraud and corruption to all your employees, including top-level management?
( ) Yes ( ) No
If affirmative, please provide evidence to support the answer.
6.4. Does your Company offer whistle blowing channels openly and broadly communicated to all your own and outsourced personnel, including mechanisms to protect the good faith denunciators?
( ) Yes ( ) No
If affirmative, please provide a copy of the documentation supporting the statement or, alternatively, indicate where these documents can be found on the company's website.

6.5. Does your Company have mechanisms for the investigation of fraud suspicions and/or corruption and the application of disciplinary sanctions?
( ) Yes ( ) No
If affirmative, please provide a copy of the documentation supporting the statement regarding the existence and application of such mechanisms, or alternatively indicate where these documents can be found on the company's website.
6.6. Does your Company have internal policies concerning third party integrity due diligences, such as suppliers, service providers, distributors, agents, consultants, sales representatives intermediaries and partners?
( ) Yes ( ) No
If affirmative, please provide evidence to support the statement regarding the existence and application of Integrity Due Diligence procedures on third parties.