



Petroreconcavo Code Of Ethics and Conduct

2nd Edition





**Petroreconcavo
Code Of Ethics
and Conduct**

Letter from the CEO

Our Code: a collective commitment to integrity and excellence

What you have at hand is not just a set of rules, but the reflection of our collective work, a commitment to integrity and excellence that permeates all our actions. This Code of Ethics and Conduct is not a simple document; it is the foundation that underpins our journey of growth and evolution. It is the embodiment of our vision of how we should operate: with transparency, respect and, above all, with a commitment to what is right.

Every word of this Code reflects the trajectory we have built together and the responsibility we all have to ensure that our company remains synonymous with integrity and trust. Throughout its history, PetroReconcavo has shown that simply achieving financial results is not enough; it is also necessary to be a leader in the way we relate to each other, to our communities, to our customers, suppliers, shareholders, strategic partners, and society as a whole.

This Code of Ethics is a powerful tool for all of us, enabling us to make assertive decisions and act with the certainty that we are always aligned with the highest standards of conduct. It guides us not only to do what is right, but to strive for continuous improvement every day, putting into practice the values that define us as an organization.

We believe that true excellence is not only in achieving goals, but in the way we deal with challenges, with our employees and with the people around us. The commitment to ethics must be reflected in every action, in every decision, in every step we take. It must be the compass that guides us and the fuel that moves us to go beyond what is expected, always with responsibility and respect.

We invite all our employees, partners, leaders and other stakeholders to read this Code, experience our culture of ethics and integrity in every day action and share your experiences. Together, we can ensure that every step of our trajectory is built on the values that make PetroReconcavo a solid and respected company, elevating our culture and legacy to new heights of excellence.

We are ready to continue our journey with the same spirit of commitment and the same passion that brought us here.

José Firmo,
CEO of PetroReconcavo



Public commitments and compacts

Integrity is a fundamental value in the conduct of PetroReconcavo's business; it is promoted by a strong organizational culture and communicated to stakeholders. We seek to maintain high standards of governance and compliance, reflected in our internal integrity ecosystem and in our institutional actions, through public commitments and compacts that progress and strengthen over time, reinforcing the reliability of our brand.

By becoming a signatory to the Compacts, PetroReconcavo is committed to becoming a benchmark in integrity, climate transparency and the management of its environmental impacts, proposing positive actions and influencing the market in which it operates, as well as proposing that the Brazilian anti-corruption legislation be widely known and complied with by its employees and stakeholders. It also undertakes to prohibit any form of bribery and to strive for transparency of information and collaboration in investigations, when necessary.

This is our commitment.



Clean Company, for Integrity and Against Corruption (Ethos Institute, since 2022)



UN Global Compact, Rede Brasil, Anti-Corruption Platform, SDG 16 (UN, since 2023)



Brazil Compact for Business Integrity (CGU, 2025)

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Our Mission

We develop opportunities in the oil and gas industry, turning resources into value and dreams into reality.



Our Vision

To be the safest, most efficient and profitable independent oil and gas operator and to lead the transformation of the onshore industry in Brazil.



Our Values

▪ Integrity

We conduct our business with integrity and respect for the law. We act with coherence and transparency.

▪ Respect and trust in people

We trust other and integrate our differences by fostering open and respectful dialogue.

▪ Safety

We work to feel good, valued and safe every day.

▪ Entrepreneurship

We encourage the development of projects and solutions, combining courage, planning and innovation.

▪ Enthusiasm

We inspire people by bringing enthusiasm, energy and passion to everything we do.

▪ Resilience

We overcome challenges by striving for continuous improvement and maintaining the balance to face adversity.

▪ Austerity

We handle the company's resources responsibly, seeking the best return.

Applicability

The Code of Ethics and Conduct ("Code") of PetroReconcavo S.A. ("PetroReconcavo"), the integrity guidelines and policies, as well as the Integrity Program apply to the Company, its subsidiaries, its managers, Directors, Statutory Officers and employees (employees and interns) who work in the Company or on its behalf.

It also applies to third parties, suppliers, customers, business partners, beneficiaries of donations and/or sponsorships, and representatives who have a relationship with the Company or who represent its interests, in Brazil or abroad, who will have specific clauses in their contracts, partnerships, agreements, terms, or arrangements, depending on the business conducted, in which they undertake to respect, comply with, and enforce, as applicable, this Code, the integrity guidelines and policies, as well as the Integrity Program.

Its application covers various environments, whether in person or remote, regardless of the location where the parties are carrying out their activities, whether in Brazil and/or abroad. PetroReconcavo operates in the states of Bahia, Rio Grande do Norte and Sergipe, and its ethical and integrity commitments extend to all its operations and relationships – in these territories and in any other location.

The code of ethics and conduct, integrity guidelines, other internal rules and definitions

This Code defines ethical and conduct principles, in addition to guiding essential behavioral attitudes. The guidelines and attitudes to be adopted are provided for, in detail, in the Company's integrity guidelines and other standards – which must be consulted in a complementary manner.

The absence of a specific rule that regulates a certain topic does not authorize conduct or practices that contradict the interests of the Company, nor does it legitimize the employee to act on its behalf without formal authorization from the leadership.

Any questions that may arise for employees regarding the interpretation of this Code can be clarified with the Compliance area, which should be consulted through the Transparency Channel in the "Questions" tab or directly, when applicable, by email: compliance@petroreconcavo.com.br



Our Ethical Principles

1. Interests

The company's interest is to act in its commercial and social practices in a transparent, ethical manner, in accordance with the law, this Code of Ethics and Conduct, integrity guidelines and policies, as well as its values, which interact with each other: integrity, safety, austerity, respect and trust in people, enthusiasm, entrepreneurship and resilience, in order to protect the image and reputation of all those involved.

This principle extends to the search for shared value, promoting the sustainable development of the regions where we operate and generating a positive socioeconomic impact.

2. Human dignity and appreciation

Everyone is worthy of treatment that takes into account their physical and moral integrity, fundamental rights, individual differences, respect and appreciation, considering human rights, which are universal rights recognized as inherent to every human being, regardless of race, gender, nationality, religion, ethnicity or any other characteristic, and the norms that recognize and protect these rights.

3. Legality

Legislation, in all its instances, rules and regulations, must be complied with, including environmental and occupational safety regulations, as well as data protection and privacy rules, such as the LGPD.

4. Honesty

Integrity and fairness are attributes that should be present in actions, decision-making, business, and relationships—which should be conducted ethically and with a stance against misconduct, fraud, and corruption.

5. Professionalism

Be a formal and institutional leader in professional conduct, regardless of your position or role, acting with respect, integrity, loyalty, decorum, diligence, efficiency, and safety, in order to become a standard for internal relationships and relationships with various audiences, representing the Company's interests, using internal resources in an appropriate, ethical, and sustainable manner, available for the full execution and success of activities.

6. Transparency and accountability

The actions, relationships and businesses practiced must be transparent, acting in a clear, concise, understandable manner, subject to consultation, made available for monitoring, reviews and audits of the stakeholders, respecting the secrecy and confidentiality of the information and negotiations relevant to each case.

PetroReconcavo is committed to the periodic disclosure of its performance, including financial, social and environmental aspects, according to the improvement of its governance and reporting practices.

7. Responsibility

Conscious of ensuring the viability of actions and businesses, acting with diligence, responsibility within the scope of their roles and fully assuming the consequences of their acts and omissions.

This principle encompasses the responsible management of resources, the mitigation of impacts and the contribution to the protection and sustainable development of communities and the environment.

Expected professional conduct and decision-making

All employees must establish courteous and respectful relationships in the workplace in order to build bonds of loyalty and trust, as well as team spirit and the pursuit of results.

Employees should guide their actions and decision-making based on four basic assumptions:

- (I) Ethically acceptable;
- (II) Legally valid;
- (III) Desirable for the Company; and
- (IV) The employee is willing to give transparency and take responsibility for the action taken.



The following conduct is not acceptable:

- **Practicing acts of physical**, verbal or gestural violence, vandalism, depredation, libel;
- **Discrimination based** on race, color, region/nation, origin/ social position, age, sex, marital status, sexual orientation, ideology, political opinions, religion or any other personal, physical or social condition;
- **Physical, verbal, visual or psychological** harassment that creates a derogatory, hostile, humiliating, intimidating, offensive or unsafe work environment, whether moral/or sexual, or any other act abusive to human or professional dignity.
- **Behaviors** that may disturb individual sensitivities (e.g., jokes, allusions, and explicit comments or advances);
- **Carrying out their professional activity** under the influence of illicit drugs, alcohol or other substances that affect their ability to perform their duties, putting their lives and the lives of other employees at risk, as well as carrying any type of weapon on company premises, even if they have a permit.



Human rights

The Company, guided by its institutional values of Respect and Integrity, as well as its ethical principles, reinforces in its culture the adherence and primacy of Universal Human Rights that guarantee dignity.

At our facilities, we promote the right to working conditions that respect the dignity of each individual.

We are signatories to the UN Global Compact, and we are committed to developing the Ten Principles of the UN Global Compact on human rights, labor, the environment and the fight against corruption. The principles adhere to our strategy and we commit ourselves, through our internal policies, to compliance with the laws protecting human dignity, whether federal, state, municipal or district, codified in international conventions such as the Universal Declaration of Human Rights, which explicitly guide this Code, and PetroReconcavo's Integrity Program.

PetroReconcavo remains vigilant and ensures that its activities and operations, as well as the actions of its suppliers, adhere to the highest standards of compliance with decent, safe and respectful working conditions; vehemently rejecting and combating any form or regression of degrading working conditions.



The following conduct is not acceptable:

- **Work analogous to slavery**, without remuneration or remuneration in exchange for subsistence, forced labor, exhausting working hours, keeping workers in degrading conditions for the purposes of safety, food, personal cleanliness or restricting locomotion, seizing documents or personal belongings to force them to stay at the workplace, among others;
- **Child labor, forced labor, sexual exploitation** of children and adolescents, and human trafficking;
- **Any form of violence** – whether physical, sexual, psychological, torture, intolerance and discrimination, including to vulnerable groups, children and adolescents, women, LGBTQIAPN+, indigenous peoples, homeless people, elderly people, people with disabilities, among others;

➔ To learn more, visit the [Universal Declaration of Human Rights](#)

Diversity and inclusion

The Company promotes diversity and inclusion, and is committed to protecting the physical and psychological integrity and individuality of all. We oppose any form of conduct that causes discrimination with respect to gender, age, disability, region, nation, sexual orientation, ethnicity, religion, political opinions and any other form of individual diversity or that is harmful to the person, their beliefs or preferences.

Differences in treatment will not be considered discrimination if they are justified based on objective criteria, considering the diversity of individuals, in order to overcome social inequalities.

PetroReconcavo is committed to expanding representation at all levels, especially in leadership positions, and seeks to be recognized for its diversity and inclusion practices in the market.

➔ To learn more, visit the [Diversity & Inclusion Policy](#)





Sustainability and Socio-Environmental Responsibility

PetroReconcavo operates with the purpose of generating value and promoting sustainable development in the regions where it is present, in Bahia and Rio Grande do Norte. Our work combines transparency, territorial presence and commitment to people, always seeking lasting positive impacts.

We believe that development is only effective when it is built with dialogue, inclusion and a long-term vision. Therefore, our actions are structuring, focusing on two strategic pillars: education and income generation:

- **Education:** we support the improvement of the quality of elementary education, contributing to the advancement of proficiency in Portuguese and mathematics, and promote complementary education for children and young people, reducing school dropout and strengthening learning. We encourage access to culture and environmental education through initiatives in music, arts, sports and activities that encourage reflection, creativity and quality of life.

- **Income Generation:** we boost social protagonism through professional training, employability and entrepreneurship programs, integrating communities, companies and public authorities. We prioritize hiring local employees and suppliers, strengthening regional economies and creating sustainable opportunities.

Our corporate social responsibility strategy is conducted in a participatory manner, involving community leaders, governments, institutions and civil society, in a data-driven local governance model, active listening and impact assessment. We use regional partnerships, incentive laws and private social investment to expand the reach and effectiveness of actions.

All initiatives are aligned with the UN Sustainable Development Goals (SDGs), with emphasis on SDGs 1 (Eradication of poverty), 4 (Quality education), 8 (Decent work and economic growth) and 10 (Reduction of inequalities).

We prioritize building shared value and strengthening local capacities. Our actions reflect PetroReconcavo's commitment to socio-economic impact and local development, defined in our dual materiality process, and reaffirm our vision of being a transforming agent in the communities where we operate.

➔ Access the [Sustainability Report](#) and get to know our social projects.

Safety and health

It is everyone's duty and responsibility to promote health and safety, physical and mental well-being in the workplace.

Safety as an institutional value reinforces the commitment to act in our operations, in order to prevent occupational diseases and accidents.

The prevention of occupational accidents is implemented through respect for current legislation, technical regulations, proper use of equipment, training and engagement of all. Employees must comply with regulations related to safety at work, in order to prevent and minimize the risks of accidents.

The Company seeks harmony between work and personal life, and is committed to the development of the employee's integral health, so that they can have quality of life, perform their activities and their innovative potential.



The following conduct is not acceptable:

- **Consuming alcoholic beverages or illicit drugs** in the work environment or while carrying out their activities, even if outside the Company's premises, as well as working while intoxicated or under the influence of substances that cause behavioral and functional interference, and which may affect the safe performance of their activities.

➔ Access the [Golden Rules](#)

Environment

PetroReconcavo has a solid commitment to environmental protection and sustainability, seeking to continuously improve the management of its greenhouse gas emissions and improve transparency in its practices, which includes compliance with environmental legislation, as well as the conservation of biodiversity and recovery of impacted areas in its operations.

To enable its activities, the Company carries out public processes to obtain environmental licensing from institutes and regulatory agencies. And it works so that all employees and third parties become aware of the prevention, control and mitigation of environmental impacts.

It is everyone's duty to immediately report any incidents or potential environmental damage, so that appropriate action can be taken. We have a CCOS (Security Command and Operation Center) prepared for environmental, operational and corporate security emergencies.



**To report environmental incidents, dial
0800 071 8027**



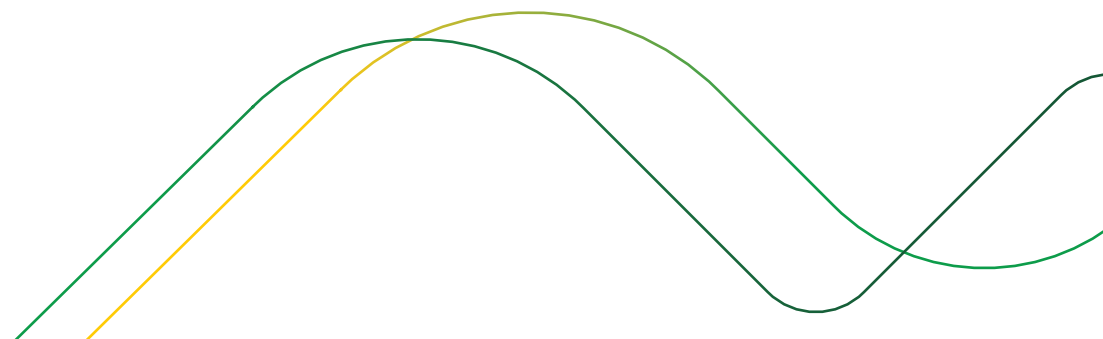
Bids and Administrative Contracts

The Company will participate in bids and administrative contracts with the Public Administration, committed to the legislation in force and to the best practices for conducting the bids, which include guidelines expressed to employees in the conduct of the processes, provided for in the Anti-Corruption Guideline.

If there is any doubt about the procedure to be followed with respect to the Company's ethical and legal standards when dealing with public officials in situations involving tenders and contracts with the public administration, do not hesitate to contact the Compliance Department for clarification by email: **compliance@petroreconcavo.com.br**.



**To learn more, visit the
[Anti-Corruption Guideline](#)**



The principle of zero tolerance for acts of corruption

The company promotes a preventive culture based on the principle of zero tolerance against the practice of illegal acts and the application of the value of Integrity and its ethical principles of honesty, transparency and accountability, which are the responsibility of everyone, regardless of their hierarchical level, location or area in which they work.

Any form of corruption, bribery, fraud, granting or payment of undue advantages, illicit favors, influence peddling, money laundering, concealment of revenues or use of accounting practices in violation of the relevant legislation or principles, will be reported to the public authorities.

In order to contribute to business sustainability through the value of integrity, it is essential that employees act preventively, mitigating the risk of corruption to which they may be subject in the course of their day-to-day activities and challenges.

PetroReconcavo ensures that its anti-corruption policies are widely communicated and that the training of its employees in integrity is a priority, aiming to proactively mitigate corruption risks and maintain compliance with relevant laws and regulations.



The following conduct is not acceptable:

1. Give, promise or offer, directly or indirectly, any undue advantage to any public official, domestic or foreign, or to any third party, for the purpose of improperly obtaining or retaining business;
2. Accept an undue advantage, kickback or bribe, commission, rebate, loan, discount, favor, gratuity or benefit as a reward or thank-you for performing your legal and professional duties;
 - I) The undue advantage is the one not authorized by law, characterized by benefit or interest sought through unlawful conduct. The undue advantage can be characterized by:
 - (a) cash and/or equivalents to;
 - (b) presents and/or courtesies;
 - (c) debt forgiveness;
 - (d) loans;
 - (e) personal favors;
 - (f) entertainment, dinners and travel;
 - (g) donations in search of a consideration;
 - (h) business opportunities, health care, among others;
 - II) The prohibition on undue advantages also applies to close or affective member, related third parties, and public officials or business partners. Bribes, kickbacks or similar payments also constitute undue advantages and are not allowed.



- III) The offering and receiving of gifts and hospitality must be in accordance with the Company's Gifts and Hospitality Guideline, so that it does not constitute the receipt of Bribes, kickbacks, and/or any illicit practice.
3. Taking advantage of or improperly using their role or position in the Company to seize business opportunities, "influence peddling" to obtain undue advantages, or illegally or improperly using confidential or privileged information about the Company, or about a business to which the Company is a party, for their own benefit and/or that of a close member/third party;
 4. Formalize or enter into any agreement, contract, collaboration term, partnership or other contractual format to benefit through services, donations, sponsorship, cooperation, of any kind, involving public agents and/or government entities, third parties, in non-compliance with the Code of Ethics and Conduct and the Company's Integrity Policies and Guidelines, the purpose of which is to influence or which may be interpreted as an attempt to influence and/or obtain favorable treatment or an undue advantage for oneself, for third parties or under the false justification of being for the benefit of the Company;
 5. Using the Company's name, directly or indirectly, to make any type of donation or contribution, including loans or advances, to candidates, political parties, political campaigns or any type of partisan organization;
 6. Hinder the investigation or inspection activity of public agencies, entities or agents, or intervene in their performance, including within the scope of regulatory agencies and supervisory bodies of the national financial system;
 7. Making any payment, for any reason whatsoever, directly or through third parties, to a public official, by means of which a government action, service or act may be unduly expedited, or aimed at ensuring the performance of an action or service in relation to its normal conditions of performance or service, especially if the act or omission may characterize undue favoritism;
 8. Improper use of the Company's assets, such as: financial resources, assets, including scraps, privileged information, business opportunities for personal or third-party gains, or for purposes contrary to the Company's interests;
 9. Failure to act, silence, adopt a passive, omissive position, or take any decision to illegitimately favor an employee, third party, potential supplier, beneficiary of donation and/or sponsorship, public and/or political agent, who is known to practice corruption and/or has suspicion that it is practiced, and does not avoid the relationship with the Company, nor denounce through the Transparency Channel;
- The employee, in approaching and/or receiving a request to pay undue advantages, must immediately reject it. Furthermore, if you witness and/or become aware of these situations, you should immediately report them directly through the Transparency Channel.

→ To learn more, visit the [Anti-Corruption Guideline](#)

Competition

The Company promotes a fair and healthy business environment, and it is therefore our duty to protect and adopt the best practices to defend free competition.

It is the obligation of all employees to act in accordance with competition legislation, preventing unfair or anti-competitive practices, such as: dividing markets between competitors, combining prices or any exchange of competitively sensitive information.

In the normal course of the Company's business, employees and third parties, depending on their functions, may have legitimate interactions with competitors at meetings and/or in the context of professional associations or unions.

PetroReconcavo acts in compliance with the legal and regulatory requirements of the oil and gas sector, adopting preventive measures to mitigate risks and avoid conduct that may compromise the legal integrity of its operations or negatively affect the competitive environment.

It is the duty of all employees to act transparently, independently and in accordance with current legislation, avoiding any practice that may be interpreted as unfair, anti-competitive or contrary to free market principles.



The following conduct is not acceptable:

- 1. Market division** – establish agreements or understandings with competitors to divide customers, territories, regions or market segments;
- 2. Price combination** – participate in any agreement or exchange of information that aims at or results in the fixing or manipulation of prices between competing companies;
- 3. Exchange of sensitive information** – sharing with competitors strategic commercial data, such as pricing policies, contractual conditions, production or expansion targets, among others, that may compromise competitiveness or constitute a violation of antitrust legislation;

To ensure adherence to and compliance with best practices, PetroReconcavo establishes express anti-competitive guidelines in the Anti-Corruption Guideline.

➔ To learn more, visit the [Anti-Corruption Guideline](#)

Prevention of money laundering, financing of terrorism and proliferation of weapons of mass destruction

The company develops and disseminates the knowledge and culture of preventing money laundering, the financing of terrorism and the financing of the proliferation of weapons of mass destruction, through the permanent assessment of its relationships from a risk perspective, using Integrity Due Diligence, among other actions, in order to prevent and detect the misuse of its resources and assets in the practice of terrorist financing, laundering or concealment of goods, rights and values, taking the necessary measures to mitigate such risks.

The following conduct is not acceptable:

Practical payment and receipt activities:

- (a) Cash transactions;
- (b) Unjustified (non-electronic) manuals;
- (c) Commission and/or bonus by contract or conclusion of business, granted by counterparties to employees;

The employee, in the identification and/or knowledge of a suspicious operation, must immediately reject and report directly through the [Transparency Channel](#).

The Company collaborates with public authorities and suspicious transactions will be immediately reported to COAF (Financial Activities Control Council).

→ **Access the [Guideline on Prevention of Money Laundering, Financing of Terrorism and Proliferation of Weapons of Mass Destruction](#)**

Conflict of interest

Conflict of interest is any situation that represents a confrontation between the personal interests of an employee and the interests of the Company, which may, in a concrete or apparent way, directly or indirectly, compromise or improperly influence the performance of the employee's duties, or the interested benefit of others, to the detriment of the Company's interests.

PetroReconcavo maintains robust policies, procedures and an Ethics Committee for the management and prevention of conflicts of interest, encouraging the proactive declaration of potential situations and acting preventively to safeguard the Company's impartiality and interests.

It is worth reinforcing that there is a conflict of interest even in situations where no improper or harmful act is produced by the activity or decision.



The following conduct is not acceptable:

1. Participate in outside activities, such as participation in political parties, collegial groups, notorious working groups, institutions, NGOs, associations, organizations, on a paid or voluntary basis, that affect their ability to satisfactorily perform their duties as an employee or representative of the Company and in compliance with the protection of the Company's image and reputation;
 - I) Thus, in paid or voluntary parallel activities, employees must communicate to the Company through the [External Activities Declaration Form](#). Depending on the activity, written permission must be obtained and the activity must not interfere with professional performance and must not be contrary to the interests and reputation of the Company;
 - II) Writing articles, books, attending conferences, conventions, lectures, or similar non-institutional activities are not considered concurrent employment if they are occasional and sporadic. However, they must be submitted for analysis when they address topics related to business, internal data and information, work routines, demonstration of projects and results, considering that they are assets of the Company and must be aligned with the leadership and sent to compliance@petroreconcavo.com.br;
2. Become a partner or investor of a competing company, or that is consolidating itself as a competitor, or as a supplier of the Company, if its position can influence the decisions made;



3. Personal relationships and relatives are not allowed in the workplace;
 - a) In situations of direct or indirect subordination in the same hierarchical line or chain of command;
 - b) Different departments that work with mutual support (indirect form) – such as departments that are part of an operational flow – and/or may carry out contracting/accountability/control activities, among themselves;
 - c) Even if there is no formal relationship of subordination, but the personal relationship could weaken internal controls, cause embarrassment to the Company, compromise mutual trust or that of third parties, or even appear to compromise impartiality, responsibility, fairness and transparency in decision-making and in the conduct of their duties.
4. Failure to act, silence, passive or inactive attitude, or any decision to illegally benefit a third party to the detriment of the Company's interests;
5. Hiring a public official and/or former public official, and/or their close or affective members; without observing the rules pertaining to the specific legislation of the public service, whether federal, state and/or municipal, on the subjects of removal, leave and dismissal, as well as the quarantine, appropriate and/or recommended for each position;

Other situations that constitute a conflict of interest are detailed in our Conflict of Interest Guideline. However, the examples cannot be limited – conflicts can arise in different ways and contexts. That's why it's essential to think before you act, asking yourself the following question:

"Am I acting in the best interest of the company and not in my personal interest or that of my family members or some other interest?"

The occurrence of a conflict of interest does not depend on the existence of obtaining an undue advantage, injury to the Company's assets, as well as the receipt of any advantage or gain by the public agent, private agent or by a third party.

Situations of personal relationships and kinship between employees working in the same area, when they have the same managerial and/or executive report, must be reported using the [Conflict of Interest Declaration Form](#)

When in doubt, contact the Compliance area. The Ethics Committee and the Board of Directors are the final bodies for managing conflicts of interest, with flows to be defined on a case-by-case basis.

Relatives: Spouse, partner, parents, children, siblings, grandparents, grandchildren, in-laws; any person living under the same roof, financially dependent or on whom you are financially dependent, regardless of the degree of kinship; other family members whose close relationship may interfere or give the impression of interfering with your ability to act in the best interests of PetroReconcavo.

Attention

The conflict of interest must be declared even in situations where no prima facie improper or harmful act is produced by the conflicting activity or decision.

Communicate by completing the [Conflict of Interest Declaration Form](#), and send it to compliance@petroreconcavo.com.br.

The suspicion of a conflict of interest situation that has not been voluntarily declared must be reported by anyone in the [Transparency Channel](#).

 **Access the [Conflict of Interest Guideline](#)**

Integrity Due Diligence

Integrity Due Diligence is the process that aims to assess the nature and extent of the risks involved, as well as the verification of integrity and reputation of the individual or legal entity involved, in order to assist the organization in making a specific decision in relation to transactions, projects, activities, hiring of employees, business partners, including partnerships such as consortia, associations, joint ventures and special purpose companies, donations, sponsorships, and suppliers.

When the evaluation indicates integrity risks and the respective diligence is not approved by the Executive Board, it will be blocked and deactivated from the Company's base. For future relationships with blocked due diligence subjects, a new Integrity Due Diligence analysis will be required.

The Integrity Due Diligence process is confidential and private, with access restricted exclusively to formally authorized employees.

➔ Access the [Integrity Due Diligence Guideline](#)

Mergers, acquisitions and other corporate transactions

PetroReconcavo conducts its mergers, acquisitions and other corporate transactions based on integrity, transparency and strict compliance with applicable laws and regulations.

In all negotiations, compliance practices are adopted, including the performance of structured Due Diligence processes. This stage includes the comprehensive analysis of the target company or asset, considering corporate, tax, labor, environmental, corporate governance and reputational aspects – such as relevant contracts, sanctions history, legal liabilities and potential risks to the institutional image.

If critical elements are identified that contradict PetroReconcavo's ethical and integrity principles, the operation must be immediately suspended, reporting to senior management for deliberation.

In addition to diligently conducting the negotiation and closing stages, PetroReconcavo also values the proper management of post-closing obligations. This includes full compliance with the contractual commitments, the correct integration of the acquired assets or companies and the continuous monitoring of the agreed indicators.

The equity interests under the Company's management are managed based on governance principles, respecting the rights and duties established in the shareholders' agreements, Joint Operating Agreements (JOAs) and other applicable instruments, always ensuring the protection of the interests of PetroReconcavo and its stakeholders.

Gifts, Presents and Hospitality

Giving and receiving gifts, presents, hospitality and advantages may, in some circumstances, give rise to claims or perceptions that a bribe, attempted bribery or obtaining an undue advantage has occurred, as well as may characterize a conflict of interest situation.

Gift: considered an item of a symbolic nature, due to the promotion of brands, advertising, usual disclosure or on the occasion of events or commemorative dates.

Present: considered a good or service for personal use or consumption, with a commercial value that is not always irrelevant or not significant, without a promotional nature – it is distributed to a specific person or organizational unit, considered acceptable by the Company with a maximum value of R\$300.00 (three hundred reais), received within a minimum interval of 12 months by the employee. Examples of presents, not limited to these: flowers, boxes of chocolates, special pens, baskets (breakfast, Christmas, etc.), alcoholic beverages, bags, shoes, accessories, barbecue kit, etc.

Courtesies: free, exclusive access, tickets to entertainment events, parties, sports events, shows, concerts, tourism trips, among others.

Hospitality: includes service offer or expenses with transportation, travel (air, sea and/or land), food, lodging, with courses, seminars, congresses, events, fairs, related or not to entertainment events.

Travel and lodging related to events, and in the interest of the Company, must be contracted and paid, whenever possible, via an accredited tourism agency, avoiding any direct payment to the employee, in accordance with the [Company's Travel Policy](#).





The following conduct is not acceptable:

- **Receive a gift, present, hospitality and courtesy**, in cash, goods and/or services, through direct transfer or any means of electronic payment directly or indirectly (through close or affective members), of a personal nature that may affect decisions, facilitate business or benefit, or may even characterize the practice of bribery, exchange of favors;
- **Receive a gift and/or present that exceeds the value of R\$ 300.00 (three hundred reais)**, even in fractions, but which repeatedly and cumulatively exceeds this value, observing a minimum interval of 12 months;
- **Receive presents, hospitality and courtesy** that have the exclusive purpose of providing tours, tourism and leisure;
- **Receive any and all courtesies purely and simply**, unrelated to corporate or institutional events, which do not reflect the Company's interest in the practice of its business;
- **Receive presents, hospitality, and courtesy** from suppliers and/or business partners with whom you are negotiating contracts or any other type of agreement, including renewals, that could compromise your impartiality and decision-making based on the best interests of the Company;
- **Sponsored travel** expenses with a close or affective member linked to the employee will not be accepted;

Attention

All receiving of presents, hospitality, courtesies, awards, invitations, etc. must be communicated to the Compliance area by completing the [Gifts, Presents and Hospitality Form](#) and sent to compliance@petroreconcavo.com.br.

In the case of receiving Gifts, they do not need to be communicated, unless they do not comply with the established requirements.

Return, formalization and evidence:

Presents, courtesies and hospitalities not authorized by the integrity guidelines, or that cause discomfort in acceptance, must:

1. Be refused at the time of offer and/or delivery;
2. If it is not possible at the time of delivery, they must be returned to the sender, through the Post Office and/or sent to the Compliance area;
3. Formalize the rejection and return by sending an email, inserting the returned item, including the sender and the email address of compliance@petroreconcavo.com.br in copy.

Sole paragraph. It is the employee's responsibility to generate evidence of the return and/or rejection of the item received.

The return or refusal of the item must be done in a polite manner, explaining the Company's rules.

 Access the [Gifts, Presents and Hospitality Guideline](#)

Donations and sponsorships

Actions involving donations and sponsorships must follow the guidelines of the Company's socio-environmental responsibility, in accordance with the pre-established action fronts.

Requests for donations and sponsorships will be submitted using the respective forms, which must be filled in with details of the project, the beneficiaries, the desired impact and, in the case of sponsorships, the counterparts. The form will be analyzed for compliance with the Donations and Sponsorships Policy and for the integrity due diligence of potential beneficiaries (including, in this analysis, their managers and directors) and the report carried out by the Compliance area will be considered by the Board of Directors for approval.

The donations and sponsorships approved will have their own contractual instrument, with the justifications of the linked project and the obligations of the beneficiary regarding the correct use of the resources. It is forbidden to use these resources in a way that contradicts the Company's interests, the legal provisions, in particular, but not limited to, those provided for in the Anti-Corruption Law (Law No. 12.846/2013), this Code, the integrity guidelines, internal policies and the Company's Integrity Program.



The following conduct is not acceptable:

Donations, sponsorships or any type of contribution, in any amounts, as well as the offer or provision of any service, loan or assignment of assets intended for:

- Political;
- Union;
- Public Agents;
- Government Entity;
- Politically exposed persons;
- Directly or indirectly benefit employees in compliance with the rules regarding conflict of interest contained in the Company's Code of Ethics and Conduct;
- Donations, sponsorships or any type of contribution, in any amounts, are prohibited for those who have a history of violating the rules of the Anti-Corruption Law;
- For-profit organizations;
- Organizations that are not exempt from paying taxes;
- Organizations or projects whose documentation is not in accordance with current legislation or that present restrictions;



- Entities that meet the requirements of the Donations and Sponsorship Policy, but are being investigated in civil or criminal investigations (it and/or its partners/administrators);
- Organizations whose objectives are not compatible with the Company's Mission, Vision and Values, and which do not meet the requirements of the Code of Ethics and Conduct, integrity guidelines and the Company's Policies;
- Donations and sponsorships will not be paid in foreign currency, nor in cash or into the bank accounts of third parties, whether natural or legal persons, other than beneficiaries, considering this to be suspicious conduct, in accordance with the Guidelines for the Prevention of Money Laundering, Financing of Terrorism and the Proliferation of Weapons of Mass Destruction;
- That donations, sponsorships or any type of contribution, in any amount, are offered, promised or granted for the purpose of obtaining an improper advantage or influencing the action of any person, whether a public official, supplier, third party, among others.

→ To learn more, visit the [Donations and Sponsorships Policy](#).

Protection of personal data

The Company, when processing personal data, respects all fundamental rights and observes the freedoms and principles recognized by the General Data Protection Law ("LGPD"), the standards of security and management of the personal data of its employees, and is available to contribute to the National Data Protection Authority ("ANPD").

The Company complies with the legal provisions in terms of the protection of personal data, preserving them from improper disclosure or outside the purposes legally or contractually provided for.

Employees who, for the development of their activities, access personal data must ensure compliance with the requirements established in the legislation and in the Personal Data Protection Policy, maintaining confidentiality in relation to this data.

Information on the processing of personal data, change of consent, among others, should be directed to the Data Privacy area through the e-mail privacidade@petroreconcavo.com.br

→ Access the [Personal Data Protection Policy](#)



Use of artificial intelligence, data governance and information security

Artificial Intelligence (AI) is a strategic tool that leverages analysis, automates processes, with the ability to process large volumes of data and generate value for the business. At PetroReconcavo, its use must be in line with the ethical, legal and technical principles that guarantee the protection of information and personal data.

Data governance is the pillar that underpins the responsible use of AI. It establishes policies, processes and controls that ensure quality, integrity, security and ethics in data processing. Any activity involving data must respect fundamental rights, privacy and current legislation, especially the General Data Protection Law (LGPD).

The use of AI follows strict principles, ensuring the construction of a reliable and fair environment:

- **Data Quality and Reliability:** data used by AI must be complete, consistent, up-to-date and obtained by reliable processes.
- **Transparency and Explainability:** the results generated by AI must be understandable, auditable and traceable in their origin and history.
- **Security and Resilience:** AI tools and associated data must be protected against failures, improper access and leaks, with controlled access.
- **Equity and Non-Discrimination:** the use of algorithms that promote bias or discriminatory practices, ensuring fair and responsible use, is prohibited.
- **Human Supervision and Responsibility:** each employee is responsible for critically validating the results generated by AI, using their technical and professional judgment, ensuring human oversight in critical decisions.

PetroReconcavo recommends the exclusive use of AI tools validated by the Technology and Innovation area, integrated with the corporate governance structure and information security and compliance mechanisms.

Data Governance establishes clear rules, responsibilities and processes to ensure the quality, security and ethical use of data. PetroReconcavo believes that without organized, protected and understood data, there is no AI that generates value. Data Governance is the basis for safe, predictable and intelligent operation.

The ethical use of AI and data governance are commitments of the Company to the integrity, trust and protection of its stakeholders. Governance is a collective effort, involving all areas of the company. Each action must generate clear value: improve decisions, reduce risks, increase efficiency or enable innovation.

If you have any questions and support, please contact the Technology and Innovation area by email:

dana@petroreconcavo.com.br





Insider information and prevention of Insider Trading

PetroReconcavo is committed to good market practices, with the transparent use of information, observing the legislation and recommendations of the regulatory body.

It is the duty of all employees, related persons², connected persons³ and third parties to strictly refrain from using privileged information⁴ or Material Facts for their own benefit or for the benefit of third parties, so as not to incur in illegal insider trading⁵ practices.

All efforts aimed at promoting market efficiency must ensure that competition between investors for better returns takes place on the basis of analysis and interpretation of the information disclosed, never through privileged access to this information.



The following conduct is not acceptable:

1. Use inside information to obtain any type of advantage, own or from third parties;
2. Trade the Company's securities in the following cases:
 - a) Before the disclosure of relevant information that is already known to you;
 - b) In the fifteen (15) days prior to the disclosure of ITR and DFP, as well as on the day of disclosure, if they have not yet been made public;
 - c) During the lock-up periods determined by the Investor Relations Officer, as provided for in CVM Resolution 44.

To find out more, visit the Securities Trading Policy and the Disclosure of Material Act or Fact Policy.

If you have any questions or concerns, please contact:
ri@petroreconcavo.com.br

²Related Persons: They include the Company, its managers, controllers, directors, members of statutory bodies, subsidiaries, affiliates and any persons with access to relevant information due to their function.

³Connected Persons: Persons with a direct link to the Related Persons, such as spouses, dependents and companies controlled by them.

⁴Inside information, in the context of investments, refers to non-public data about companies or financial assets, which may influence the price of shares or securities.

⁵Insider Trading: Illegal practice of trading securities based on material and not yet public information, in order to obtain a financial advantage.

Contracting and relationship with suppliers and third parties

PetroReconcavo prioritizes the relationship with suppliers who share its ethical principles and socio-environmental responsibility, seeking to develop strategic partnerships that contribute to local development. The supplier selection and monitoring process includes rigorous Due Diligence to ensure compliance with integrity, human rights, environmental and health and safety requirements, ensuring that the operations of the Company and its partners remain aligned with the highest standards of conduct.

The contracting of suppliers and third parties is based on technical criteria, conducted through a predetermined objective process, such as competition or price quotation, which guarantee the suitability of the contracting, the quality of the services, the best cost-benefit ratio, the sustainability criteria, as well as considering the needs and specificities of the business.

The relationship with suppliers and third parties must be guided by respect, cordiality, transparency and integrity. In the contracts signed, there must be a clause adhering to this Code and the Company's Integrity Program, and a commitment to legality, the prevention and fight against corruption, fraud and bribery, the proper treatment of personal data, as well as specific clauses, depending on the business carried out, in which they undertake to respect, comply with and enforce compliance, where applicable.



The following conduct is not acceptable:

1. Unfair competition;
2. Negotiations that may result in obtaining undue advantages or personal benefits, for themselves or third parties, that characterize a conflict of interest, in accordance with the provisions of this Code, the Integrity Program and the guidelines;
3. Provide paid services and/or favors to suppliers and/or third parties with whom they have a relationship due to the activities performed in the Company;
4. Accept and/or offer commission and/or gratuity by contract, conclusion of business or other modality that involves purchases and services of interest to the Company;
5. Accept and/or offer gifts, presents, hospitality and courtesies outside the limit allowed by this Code and [Guideline for Gifts, Presents and Hospitality Code](#);

➔ Procurement practices and contracts must comply with the [Third Party Contracting and Management Manual](#).

Relationship with political parties, trade unions and associations

The Company does not finance political parties, unions and associations in Brazil or abroad, their representatives or candidates, nor does it sponsor congresses or parties whose exclusive purpose is political propaganda, and it abstains from any political-partisan positions.



The following conduct is not acceptable:

- Support participation in political and/or party campaigns or activities using the Company's name;
- Use any installation, material and equipment of the Company to support political parties or election of candidates, as well as the distribution of pamphlets, stickers, placement of posters, or any form of political party manifestation;

The employee who wishes to participate in political and electoral processes must ensure that the Company's image is not associated with advertising and immediately inform the Company's Compliance area by email: compliance@petroreconcavo.com.br

Right to privacy

The company respects the right to privacy of its employees, and is committed to protecting their privacy, honor and image in their manifestations, the processing of their personal data, as well as respecting the personal communications of its employees on the internet and other means of communication.

Employees undertake to responsibly use the means of communication, technology systems and, in general, any other means made available to them, in accordance with the internal rules and criteria established for this purpose.



Attention

The means of communication and systems are not provided for personal, non-professional use and are therefore not suitable for private communication. In this way, they do not generate rights or expectations of rights to privacy if they have to be supervised or monitored by the Company in the proportional performance of its functions of control and prevention of illicit and inappropriate conduct.



Relationship with public authorities

The Company maintains a relationship with the government (government entities, control bodies, regulatory agencies, among others) through its public agents, using the principles of Public Administration and trust, professionalism, collaboration, reciprocity, political party independence and good faith, using the laws, guidelines of this Code, integrity guidelines, policies and other internal rules.

In order to carry out its activities, the Company must obtain licenses, permits and authorizations from different government agencies and entities, and the adoption of practices to prevent corruption risks must be observed, with a view to preserving the integrity value.

The performance of employees with public agents and government entities, inside or outside the Company's facilities, whether through physical and/or virtual means, must be carried out in accordance with the Anti-Corruption Guideline.

→ To learn more, visit the [Anti-Corruption Guideline](#).

Image and reputation protection

It is the duty and responsibility of all employees to ensure the protection of the Company's image and reputation, its brand, the use of its resources and assets, whether acting in person or remotely, in physical and/or digital media, or wherever they operate, even outside working hours.



The following conduct is not acceptable:

Acts harmful to the Company's image and reputation, to the image or honor of its employees, in any type and means of communication, including social media, such as the production or dissemination of fake news, images or facts not ascertained.



Relationship with the communities surrounding the operations

We establish a relationship of respect with local communities and cultures, considering the social groups involved in our operation, in order to identify their expectations and needs, with the aim of implementing actions aimed at exercising citizenship and local development, minimizing environmental, social and cultural impacts, through Sustainability and Social and Environmental Responsibility actions.

PetroReconcavo maintains a continuous and proactive dialogue with the communities neighboring its operations, seeking to understand and address local demands.

Employees and suppliers must, in the routine of their field activities and interaction with communities, provide respectful treatment, using the Laws, Values and Ethical Principles of this Code.

The Company maintains open and permanent communication channels, through **comunidades.ba@petroreconcavo.com.br** (Bahia) and **comunidades.rn@petroreconcavo.com.br** (Rio Grande do Norte).



The following conduct is not acceptable:

- Establishing voluntary agreements with communities, through leaders and associations, or whoever represents them, without complying with the Laws, this Code, integrity guidelines, and other internal rules, or without the formal knowledge and authorization of the Executive Board.

The relationship with the communities, through employees and/or suppliers, in the exercise of their activities, which do not comply with these requirements, must be reported through the [Transparency Channel](#).

Relationship with shareholders

PetroReconcavo's relationship with its shareholders, investors and the market is guided by transparency, timeliness and equity, in compliance with its legal and institutional role, in order to establish a bond of trust and responsibility with stakeholders, ensuring an open dialogue and the disclosure of reliable information, consolidating the transparency of corporate activities developed and implemented.

Interactions with investors and financial analysts are conducted by the Investor Relations area, which operates in accordance with CVM (Brazilian Securities and Exchange Commission) standards and best market practices, reinforcing our commitment to governance and corporate integrity.

→ **Access the [Disclosure of Material Act or Fact Policy](#).**
If you have any questions or concerns, please contact:
ri@petroreconcavo.com.br

Relationship with society

The company operates in the oil and gas segment, committed to the ideals of respect for human rights, democracy and citizenship, to develop and expand its activities in a responsible manner, in harmony with the public interest, preventing and combating fraud, illicit activities, deviations and corrupt practices.

Everyone can report any violation and suspected violation of the Laws, this Code, integrity guidelines and policies, as well as the PetroReconcavo Integrity Program, through the [Transparency Channel](#).

Record of operations, financial and accounting information

Records made in accounting books are made and reported in accordance with accounting standards applicable in Brazil and the International Financial Reporting Standards ("IFRS"). Financial records are made with integrity and accuracy.

The process, in order to make the aforementioned records, needs to follow the Company's internal control system. Financial and accounting records and information must be kept and preserved in accordance with applicable laws and policies regarding the safekeeping of these types of records, and available for internal and external audits and verifications. Any record, potentially relevant to a case of infringement of the law or to any pending litigation or investigation, may not be destroyed.

The Company's Accountant is responsible for closing the accounting books.

Every employee, upon becoming aware of omission, falsification or inaccuracy in the accounting and financial records, or in the information that underlies such records, or in other communications, or any violation of internal controls, must report to the [Transparency Channel](#).





Institutional relations

The Institutional Relations area represents PetroReconcavo in the energy sector, in which the Company operates, before government administrative bodies, civil society, and other institutions, with the aim of building and maintaining a strategic dialogue to influence decisions, anticipate risks and opportunities, strengthen its positive image and credibility, and promote partnerships.

It is the role of the Institutional Relations area to act as a link between PetroReconcavo and these external audiences, monitoring the political and regulatory environment and articulating positions so that it can actively participate in decision-making processes and achieve its objectives, using the company's vision, mission and values as its pillars.

Visit the website www.petroreconcavo.com.br.

If you have any questions or concerns, please contact:
relacoesinstitucionais@petroreconcavo.com.br.

Communication, spokespersons and press

The Communication area is responsible for providing clear, timely, reliable information, safeguarding sensitive, privileged information and industrial secrecy, in the interest of the Company, the press and other interested audiences, considering the exceptions, such as communication to the market, made by the Investor Relations area.

The Company's spokespersons are the Officers and/or whoever is designated, to speak on its behalf, in a formal manner.

The Company has, on its website, an institutional communication channel, to which requests for information and relationship with the Press should be directed.



The following conduct is not acceptable:

- Unauthorized employees are not allowed to speak on behalf of the Company, disclose information, documents, or represent it, without formal authorization;

Use of social media, participation and sharing

The company is present on social networks with the aim of interacting with its connected public, to share and expand knowledge and experiences, as well as strengthening relationships.

The participation, collaboration, creation, association of collaborators in social networks, forums or blogs on the internet and the opinions or statements made in them, must be issued in a non-anonymous and personal manner, making it clear that they do not represent an official position of PetroReconcavo.



The following conduct is not acceptable:

- Adoption of inappropriate behavior that causes embarrassment to the image and honor of the Company and its employees;
- Publications of a prejudiced, discriminatory, defamatory nature, with pornographic content or that encourage, or constitute, the commission of offenses or crimes;
- Unauthorized disclosure of employees, work routine, physical facilities, personal data and sensitive personal data, confidential information.

→ Access the [Social Media Guideline](#)

Use and utilization of assets and equipment

Each employee is responsible for protecting the resources entrusted to him/her for the development of his/her activities, and has the duty to promptly inform the leadership of any threats or events harmful to the Company.

The Company reserves the right to prevent the distorted use of its assets, equipment and infrastructure through the use of systems, reports, controls, inspections and audits, without prejudice to referring misuse and illegal practices that contribute to damage, harm, exposure and negative reputation to the competent authorities.

The employee must:

- Work diligently to protect the Company's assets through responsible conduct in line with this Code, the integrity guidelines, policies and other internal rules;
- Use the Company's tools, machinery, equipment and other material and immaterial resources properly, carefully, rationally and sustainably, for work purposes only, avoiding and combating all forms of misuse and waste;
- Avoid the misuse of Company property, inside or outside the work environment, which could cause damage or reduce efficiency, or in any case be contrary to the interests of the Company.

Transparency channel

It is the duty and responsibility of all employees, or those who are aware, to report any violation and suspected violation of the Laws, this Code, the regulations, as well as the PetroReconcavo Integrity Program.

The Transparency Channel is external and independent, managed by an autonomous company. The Company ensures that all complaints received through the Transparency Channel, or by any other means, will be registered and investigated with independence, impartiality, methodology and legal protection, ensuring confidentiality, anonymity and prohibition of retaliation to the whistleblower in good faith. Retaliation is considered to be adverse, persecutory, discriminatory or punitive actions or omissions taken against an employee, or other interested party, who has reported unethical conduct, irregularities, legal and/or policy violations or other related issues that impact the Company.

The effectiveness of the Transparency Channel is continuously monitored to ensure transparency and effectiveness in addressing the issues raised, providing appropriate feedback to stakeholders.

To learn more, access the [Procedure for Using the Transparency Channel](#).

Reports and communications of violations must be made through the Transparency Channel, which is available on the Intranet and Internet through the following access points:



Violations, investigations, disciplinary measures and communication to public authorities

Violations registered in the Transparency Channel will be evaluated, subsequently investigated and, when the illegal, unethical or non-compliant practice is identified, may result in disciplinary measures, penalties, including dismissal for just cause for employees and members of senior management, and contractual termination, in the case of suppliers and service providers, who incurred the deviations. In all cases, they are subject to administrative, civil and criminal sanctions, under the terms of the respective legislation.

The body responsible for recommending ethical sanctions is the Company's Ethics Committee, which reports to the Board of Directors.

The acts and/or suspicions of fraud, corruption, misconduct, acts harmful to the Public Administration, will be spontaneously reported to the competent authorities, in order to collaborate and cooperate with possible investigations, as a way to reinforce the Company's commitment to combating corruption, through its compliance mechanisms for preventing, detecting and responding to illegalities.

➔ To learn more, visit the [Investigations Guideline](#)

Access to policies, guidelines and forms

PetroReconcavo makes its documents approved by the Board of Directors, such as this Code, available on the internet via the website www.petroreconcavo.com.br.

The other internal documents, such as guidelines and forms for employee completion, are available on the Intranet page, in the Quality management system, as well as on the Integrity Program page. If you have any questions, contact the Compliance area by email: compliance@petroreconcavo.com.br

Mandatory periodic training

Training on this Code, as well as on the Company's other integrity guidelines and policies, is mandatory and must be taken by all employees within the stipulated time limits.

PetroReconcavo continuously invests in the training and development of its employees through periodic and mandatory training, aiming to strengthen technical and behavioral skills and ensure adherence to the principles of integrity and human rights. Refusal to participate in the Trainings is considered an ethical infraction and subject to disciplinary measures.

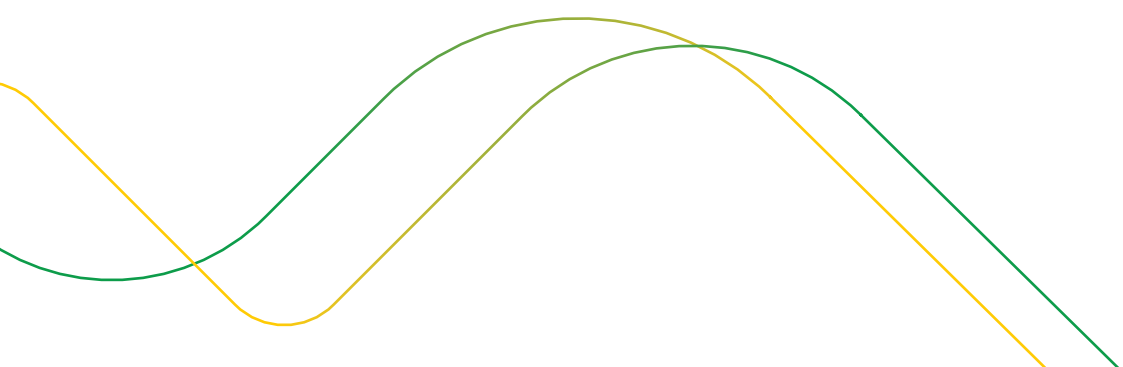
General provisions and approval

The Code of Ethics and Conduct must be revised every two years, or at any time in the company's interest, based on legislative changes, as well as suggestions and proposals made in order to improve the culture and promote the Value of Integrity.

Cases not covered by this Code must be interpreted in accordance with the Anti-Corruption Law No. 12.846/13 and Decree No. 11.129/22, the Brazilian Penal Code; the Administrative Improbability Law, Federal Law 8.492/1992, where applicable and Law No. 14.230/2021; the Anti-Money Laundering Law (Federal Law No. 9.613/1998); the General Data Protection Law (Law No. 13.709/2018); the Emprega + Mulheres Program Law No. 14.457/2022 (obligations regarding combating harassment), the Bidding Law (Federal Law 14.133/21); the Law on the Prevention and Repression of Violations against the Economic Order (and Federal Law 12.529/2011); the US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act (UKBA), as inspiration and where applicable, the Law on Conflicts of Interest 12.813/13, the applicable CVM regulations, the Novo Mercado Regulations, the Bylaws, the integrity guidelines and policies of PetroReconcavo's Integrity Program and the Company's internal rules, where applicable.

The amendment of this Code of Ethics and Conduct is the exclusive responsibility of the Company's Board of Directors.

**Approved the update on 09/xx/2025
PetroReconcavo Board of Directors.**



Acceptance and signature

All Petroreconcavo, its subsidiaries, and affiliates must acknowledge and accept the rules set forth in the Code of Ethics and Conduct. The confirmation of acceptance is made through digital signature, by filling out the form, and must be sent to the Compliance area.

The managers must sign a term of consent in relation to this Code, at the time of their investiture.

The employees of PetroReconcavo ("Company"), (managers, executives, employees and interns) will accept the rules established in this Code.

The suppliers, third parties and service providers of PetroReconcavo ("Company") accept the rules of action established in this Code of Ethics and Conduct, as applicable to them.

In employment and service contracts, there must be an express clause adhering to and complying with this Code.



Employees

I, an employee of PetroReconcavo ("Company"), accept the rules established in this Code of Ethics and Conduct:



Scan the QR Code
beside and sign digitally

Suppliers

I, a service provider of PetroReconcavo ("Company"), accept the rules established in this Code of Ethics and Conduct that apply to me:



Scan the QR Code
beside and sign digitally