

**INTEGRITY PROGRAM
PETRORECONCAVO**

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1. INSTITUTIONAL

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 people and integrate 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.

2. MESSAGE FROM MANAGEMENT

*“At **PetroReconcavo**, integrity is the foundation that supports every decision, every operation, and every relationship we build. Our path of growth and excellence is only possible because we cultivate a culture of **ethics, transparency, and responsibility**, conducting our business with respect and commitment.*

*The **PetroReconcavo Integrity Program** is one of the pillars of this culture. It guides us so that every employee, regardless of their role, **always acts based on the best practices of governance and compliance**. As leadership, we have the non-negotiable commitment to set an example and foster an environment where **ethical and fair behaviors are the norm, not the exception**.*

*However, we know that **integrity cannot be imposed — it must be practiced**. It is in our daily choices, in small and large decisions, that we demonstrate our genuine commitment to ethics and transparency. Therefore, I invite each of you to be an active agent of this culture, helping to strengthen **PetroReconcavo's** reputation as a leader in the oil and gas industry.*

Together, we are ready for an increasingly solid future, guided by trust, responsibility, and the pride of always being ethical.”

With responsibility and commitment,”

José Maria de Mello Firmo

Chief Executive Officer

Carlos Marcio Ferreira

Chairman of the Board of Directors

3. INTRODUCTION

PetroReconcavo ("Company") is an independent oil and gas operator, focusing on mature onshore fields in Brazil. With a respected reputation among customers, regulators, suppliers and employees, we have a high level of performance and extensive experience in the industry.

The Company plays a fundamental role in promoting the country's economic development, either through its performance in its core business or by supporting the spread of best practices in corporate governance and transparency.

In compliance with the legal requirements for the prevention and combating of corruption contained in Law No. 12.846/2013 (Anti-Corruption Law), Regulatory Decree No. 11.129/2022, CGU Regulation No. 909/2015, as well as international legislation on the fight against corruption and bribery, and in the best practices of corporate governance, PetroReconcavo launched the first version of its Integrity Program, approved by the Board of Directors, on 09/29/22, demonstrating its commitment to fight and reject corruption and illegal acts practiced against the public administration, as well as unethical practices that may harm the internal environment, its reputation and image, in Brazil and abroad, in the fight against transnational bribery.

In its second edition, PetroReconcavo's Integrity Program reflects the high investment in corporate governance, continuous improvement and the Company's development plan, through the update of this policy, the incorporation of a new structure, the expansion of tools and technology.

Decree no. 11.129/2022 defined Integrity Programs in art. 56:

The integrity program consists, within a legal entity, of the set of internal mechanisms and procedures for integrity, auditing and encouraging the reporting of irregularities and the effective application of codes of ethics and conduct, policies and guidelines, with the objective of

I - Prevention, detection and correction of anomalies, fraud, irregularities and unlawful acts practiced against the public administration, national or foreign; and

II - Promoting and maintaining a culture of integrity in the organizational environment.

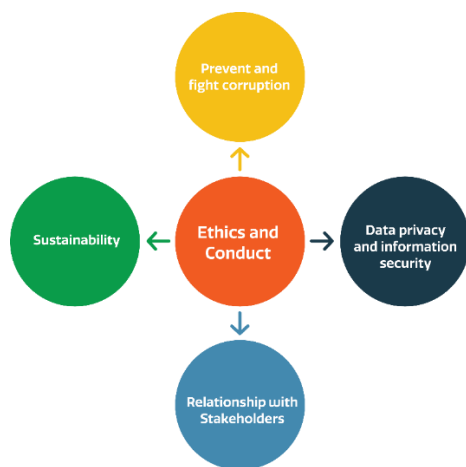
Sole paragraph. The integrity program must be structured, applied and updated according to the characteristics and current risks of the activities of each legal entity, which in turn must ensure the continuous improvement and adaptation of said program to ensure its effectiveness.

By updating this program, PetroReconcavo reaffirms its willingness to become a reference in integrity, transparency and ethics in the business in which it is involved, with the objective of continuously improving its governance mechanisms, allocating resources and collaborating for the full implementation, existence and application of the requirements present in the Decree.

1st version Program approved on 09/29/2022
Approver: PetroReconcavo Board of Directors

4. THE PETRORECONCAVO INTEGRITY PROGRAM

Refers to the set of continuous actions that collect, Code of Ethics and Conduct, Integrity Guidelines, policies and procedures, aimed at strengthening the culture, from the prevention and fight against corruption, privacy and information security, relationship with stakeholders and sustainability, which aim to subsidize the company's performance, in the various risks considered.



In accordance with the Company's Vision, Mission and Values, the long-term goal is to develop in employees a secure, transparent behavior in relationships, which gives independence, supports decision-making and increases organizational trust, creating and protecting value.

The Integrity Program becomes part of the Company's routine as it acts in an integrated manner with the departments and employees, through zeal for the integrity value, corroborated by effective communication and training. This occurs through the exercise of preventive, detective and repressive functions, with the support of Senior Management.

5. ATTRIBUTES, PILLARS AND CULTURE

Program Structure - meeting requirements (Attributes)

"How it's done"

Existence: Regarding the presence, in the Company, of each element that makes up the dimensions;

Quality: Regarding its suitability, in accordance with best practices;

Effectiveness: Regarding its effective functioning.

Systemic view -> Follows the Company's dynamics -> Feedback (Pillars)

"How it works and fits the needs of the Company"

Prevention: Establishment of clear instructions for business conduct;

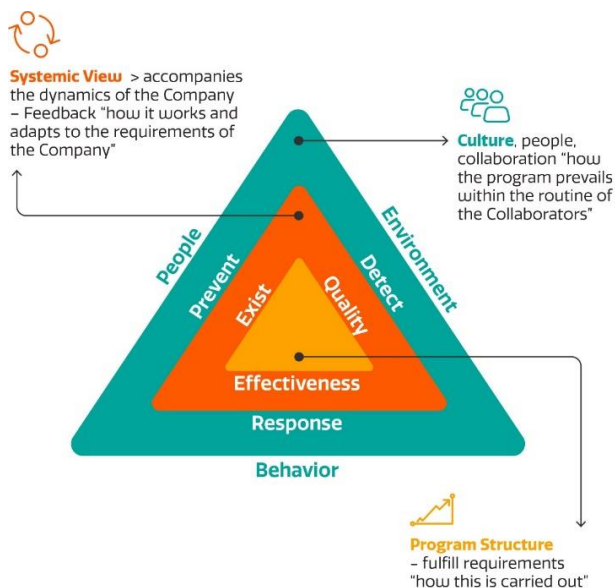
Detection: Monitoring of business activities;

Response: Clear and unequivocal response to violations, implementation of constant improvements.

Culture

"How the Program is alive in the routine of Employees"

In view of the intangible aspects of culture, the Program must **impact** people, influence behaviors **and modify** the environment, **bringing collaboration.**



6. DIMENSIONS

1. Development of the Integrity Program Management Environment

- I. Commitment of the senior management of the legal entity, including the Board of Directors, as evidenced by visible and unequivocal support for the program and the allocation of adequate resources;
- II. Independence, structure and authority of the Compliance Department, the internal body responsible for applying the Integrity Program and monitoring compliance;

(a) Composition of the Compliance Department:

Petroreconcavo is proud to have an internal Compliance structure dedicated to the Integrity Program. The team is composed of highly qualified and experienced professionals who work together to ensure the effectiveness of compliance activities throughout the company, with the following composition

- **Compliance, Risks, Controls and Audit Manager** - responsible for coordinating and managing the activities of the Integrity Program and ensuring the effective implementation of the Program's policies.
- **Compliance Analysts** - responsible for the implementation of the Integrity Program, focusing on the development and maintenance of a culture of good practices guided by ethics, integrity and respect for applicable laws.

(b) Prerogatives of the Compliance Department:

- **Independence:** the Compliance Department reports results to the Board of Directors, through the statutory Audit Committee, subordinate to it.
- **Decision-making autonomy:** the members of the Compliance Department have the autonomy to make decisions related to the application and inspection of the Integrity Program, without interference or external pressures that may compromise their impartiality.
- **Budgetary autonomy:** the Compliance Department has the autonomy to prepare its annual budget, based on its activity cycle, and to determine the financial and human resources necessary for the full development of the Integrity Program, ensuring the independence of

investments and the remuneration of professionals commensurate with their positions.

- **Unrestricted Access to Information:** members of the Compliance Department will have full and timely access to information relevant to the performance of their duties, including files and documents, e-mail, instant messages, system access records and other data that may assist in the investigation of irregularities and in the investigation of complaints.
- **Protection against Retaliation:** members of the Compliance Department are guaranteed protection from retaliation, discrimination or arbitrary punishment for acting in accordance with their ethical and legal responsibilities, particularly in cases involving investigations of senior management.

2 Periodic Risk Analysis

- I. Analysis of the Company's risk profile necessary for structuring the Integrity Program;
 - (a) The assessment shall address risks specifically related to integrity;
 - (b) Adequate risk management, including its analysis and periodic reassessment, to make necessary adaptations to the Integrity Program and the efficient allocation of resources;

3. Structuring and Implementation of Policies and Procedures

- I. Standards of Conduct and Code of Ethics and Conduct that apply to all employees and managers, regardless of position or function;
- II. Integrity guidelines, policies and procedures that apply to all employees and managers, regardless of position or function;
 - (a) Anti-Corruption Guideline;
 - (b) Guideline on Prevention of Money Laundering, Financing of Terrorism and Proliferation of Weapons of Mass Destruction;
 - (c) Conflict of Interest Guideline;
 - (d) Integrity Due Diligence Guideline;
 - (e) Gifts, Presents and Hospitality Guideline;
 - (f) Diversity and Inclusion Policy;

- (g) Donations and Sponsorship Policy;
 - (h) Data Protection Policy;
 - (i) Information Security Policies;
- III. Accounting records and controls that ensure the prompt preparation and reliability of reports and financial statements of the legal entity;
 - (a) Effectiveness of the Company's internal controls;
 - (b) Internal Audit Report through periodic evaluations;
- IV. Appropriate risk-based due diligence for:
 - (a) Contracting and, where appropriate, supervising third parties, such as suppliers, service providers, agents, shippers, consultants, sales representatives and affiliates;
 - (b) Recruitment and, where appropriate, supervising politically exposed persons, as well as their family members, close associates and legal entities in which they have an interest;
 - (c) Conducting and supervising sponsorships and donations;
- V. Verifications, during mergers, acquisitions and other corporate transactions, of the commission of irregularities or illicit acts or the existence of vulnerabilities in the legal entities involved;
- VI. Transparency Channel, a tool for receiving reports of irregularities that is open and widely disseminated to employees;
 - (a) Transparency Channel is external and independent, managed through a platform that allows you to report irregularities or suspicions anonymously and impartially. Complaints may be anonymous or identified, ensuring the protection of the person making the report in good faith and non-retaliation.
- VII. Decision-making process;

4. Communication and Training

- I. Communication about the Program and mandatory periodic training;
- II. Transparency of the legal entity;

5. Program Monitoring, Remediation Measures and Penalty Enforcement:

- I. The Compliance Department will submit reports with the results of the monitoring of the Integrity Program to the Ethics Committee, and to the highest levels of the company, namely: Board of Directors, through the Statutory Audit Committee or Executive Board. The monitoring of the Integrity Program will take place under the responsibility of the Compliance Department and of formal and semiannual periodicity, aiming at its improvement in the prevention, detection and fight against the occurrence of harmful acts, provided for in art. 5 of Law No. 12.846, of 2013;
- II. Procedures that ensure the prompt interruption of irregularities or infractions detected and the timely remediation of the damages generated;
- III. Application of disciplinary measures in case of violation of the Integrity Program, through:
 - (a) Ethics Committee
 - Internal Regulations of the Ethics Committee.



7. INSTANCE, APPLICABILITY AND RESPONSIBILITIES

The Integrity Program is a commitment approved by the Board of Directors. The Executive Board, the Ethics Committee and Compliance are governance bodies to support, advise and implement the Program, as well as the execution and enforceability of its prerogatives.

The Compliance Department is exclusively dedicated to the Company's Integrity Program in Brazil and, to ensure the independence and autonomy necessary to carry out its activities, reports to the Chairman of the Board of Directors through the Audit Committee and coordinates the Ethics Committee. The Compliance Department reports functional/administrative to the CFO (Chief Financial Officer).

In order to ensure that its actions are properly aligned with the Company's characteristics and strategy, it may directly convene the statutory Board of Executive Officers and the Board of Directors as needed and seek strategic guidance.

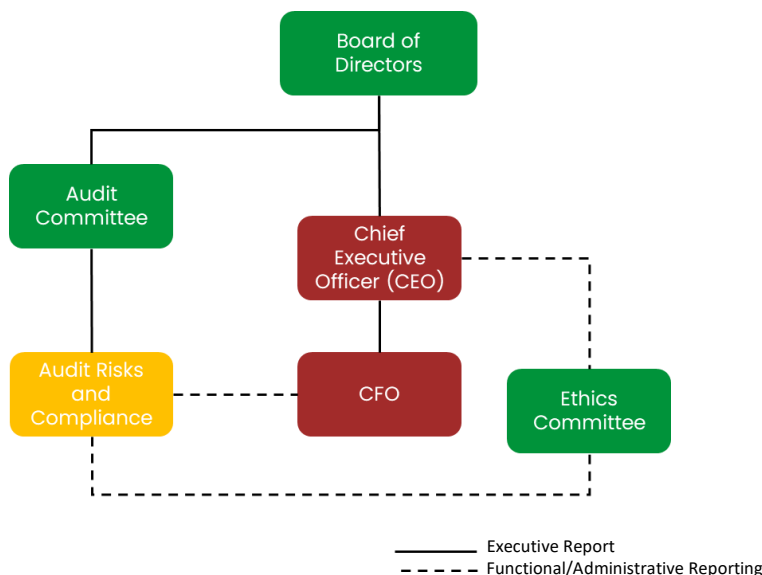
Senior management, as represented by the Board of Directors, the Executive Board, and governance bodies, is committed to

- (i) working in strict compliance with national and foreign laws, respecting integrity regulations, in particular the Brazilian Anti-Corruption Law (Law No. 12.846/2013);
- (ii) ensure authority, responsibility, independence, exemption from conflicts of interest and resources for the implementation of the Integrity Program, and;
- (ii) demonstrate commitment and leadership to the Integrity Program, including engaging your chain of command.

To ensure the effectiveness of the Integrity Program, there will be synergy between the activities performed by Compliance and the departments of Communication, People and Management, Organizational Development, Legal, Quality and Regulation, Contracts and Purchasing, Innovation and Technology, Internal Audit and other leadership of the Company.

The Program Dimensions, in accordance with Decree 11.129/22, apply to its administrators, employees (executives, employees and interns), subsidiaries, the entire Company, as well as third parties, suppliers, customers, business partners, beneficiaries of donations and sponsorships, as appropriate, in Brazil or abroad.

Responsibilities do not create differences in treatment of employees, in which they are equally subject to the Program, as well as disciplinary measures.



8. BUSINESS PACT FOR INTEGRITY AND AGAINST CORRUPTION

PetroReconcavo joined the ETHOS Institute and is a signatory to the **Business Pact for Integrity and Against Corruption**. This is a **voluntary commitment made by private and public companies, whose objective is to unite them in promoting a more integral and ethical market** and reducing different corruption practices.

Upon becoming signatories to the Pact, **the companies undertake to disclose the Brazilian anti-corruption legislation** to their employees and stakeholders, so that it is fully complied with. Furthermore, they undertake to prohibit any form of bribery and strive for transparency of information and collaboration in investigations, when necessary.

This is our commitment.



9. TRANSPARENCY CHANNEL

It is the duty and responsibility of all employees or those who have knowledge of a violation or suspected violation of the law, the Code of Ethics and Business Conduct, the Integrity Guidelines, policies and this Program to report it.

The Transparency Channel is external and independent, managed through a platform that allows you to report irregularities or suspicions anonymously and impartially. Reports may be anonymous or identified, ensuring the protection of the person making the report in good faith and non-retaliation.

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:



We are united in promoting Integrity in our Company!

**Program approved on 02/27/2025
PetroReconcavo Board of Directors**