

GCA-PL-0001 - POLÍTICA DE COMPLIANCE - POLÍTICA DE COMPLIANCE - Versão Inglês

1. PURPOSE

The purpose of this document is to describe, in a plain language, the Compliance principles and guidelines for all employees, clients, vendors and other stakeholders of Petronect, and to disseminating a Compliance culture and practice, showing the importance of knowing and observing legal, regulatory, regulatory and procedural requirements, both external and internal, to be adopted by Petronect.

2. REFERENCE DOCUMENTS

[Código de Ética - versão inglês](#)

3. DEFINITIONS

Compliance: The English word Compliance means "*cumprir*" in Portuguese. Since there is no equivalent word in Portuguese reflecting the actual meaning of this term, Petronect has adopted the term Compliance because it is widely used and understood by companies and governments worldwide. Therefore, the term Compliance is used to define "to be compliant with" the rules that the company and its employees must follow in accordance with the statutes, regulations, rules and procedures, both external and internal to company.

Compliance Program: A program that, in a corporate environment, aims to prevent and/or identify conducts that are not compliant with the rules (statutes, regulations, rules and procedures, either external or internal to company), identifying risks and/or causes and acting to prevent and/or remediate, by promoting a culture that encourages the compliance with these rules and an ethical conduct.

Client: Organization that is given access to Petronect products or services.

Vendor: Organization that provides goods or services to Petronect or Petronect's clients.

Employees: An individual or a legal entity that have an employment bond of civil or labor nature with Petronect for the provision of services.

Stakeholders: A legal entity or an individual that directly or indirectly affects, or are affected in any way by, Petronect.

Corruption: Action, direct or indirect, consisting of authorizing, offering, promising, requesting, accepting, delivering or receiving undue advantage, whether economic in nature or not, involving public agents or not, with the aim of practicing or not practicing certain act.

Fraud: It is any intentional action or omission with the aim of harming or deceiving another person, capable of resulting in loss for the victim and/or undue advantage, pecuniary or otherwise, for the author or third parties. It is also characterized by the false statement or omission of material circumstances in order to lead or mislead third parties.

Money Laundering: Consists of a set of commercial or financial operations that aim to hide or conceal the nature, origin, location, disposition, movement or ownership of goods, rights or values arising, directly or indirectly, from a criminal offense.

4. DESCRIPTION

Petronect understands that being Compliant means to identify, understand and comply with the laws and regulations related to Petronect business, and following the rules and procedures defined by Petronect.

Additionally, it must comply with contracts and agreements signed and disclose financial reports in line with the current regulations, and act prospectively to avoid losses and fraud.

This Policy applies to all Petronect employees and, based on this document, each Leaders is expected to encourage its teams to be compliant and act in accordance with Company's ethical conduct standards and, indirectly, to all Customers, Suppliers and other interested parties who, due to any relationship established with Petronect, undertake to respect all legal provisions in force.

4.1 Guidelines

Petronect employees are responsible for Compliance, regardless their functions in the Company.

Everyone is a Compliance agent and must act in accordance with Petronect's guidelines, based on the following assumptions:

4.1.1 Applicable Regulations

Abide by the law applicable to your business and commit to do your business with integrity and to the highest ethical standards, not tolerating misconducts or any type of violation or noncompliance with legal obligations or internal rules and procedures.

4.1.2 Strategy, Goals and Values

The vision, mission, strategies, goals, operations, processes and activities should reflect Company's full commitment to Compliance actions, providing a safe environment for decision making, in line with the objectives of being a benchmark in ethics, integrity and transparency, in our area of activity.

4.1.3 Organizational Structure of Governance

Include the Compliance function in Petronect's Organizational Structure, directly connected with the Management with (i) authority and responsibility for the consistency and integrity of the compliance management system; (ii) clear and unequivocal support with direct access to Management; (iii) information and resources required to perform the compliance tasks, and (iv) integration with the Governance (including risk and audit) and Legal departments.

4.1.4 Management of Risks

Continuously identify, evaluate, monitor and mitigate compliance risks, considering all Stakeholders and aspects inherent to Company's business, aiming to act preventively and mitigating any intentional or unintentional breach to the required behaviors and attitudes, avoiding the risk of any misconduct event, including, but not limited to, fraud, corruption, money laundering, terrorist financing, sexual and moral harassment, property/nonpecuniary damage, nepotism and conflicts of interest.

Additionally, mechanisms should be implemented that are capable of timely identifying and stopping any misconduct not otherwise avoided by prevention actions.

4.1.5 Accessible Policies, Standards, Procedures and Documents

Implement and continually improve Company's standards and procedures supporting the Compliance Policy and incorporate and integrate its principles and concepts to any hierarchical levels and processes of the organization.

Ensure that the documents governing the behavior and attitude required by Company are accessible to the applicable stakeholders.

4.1.6 Communication

Communicate, whenever noticed, any behavior considered inappropriate that violates the Code of Ethics, in order to avoid inappropriate conduct in the corporate environment.

Provide channels of communication, securing claimant's anonymity, allowing the Company to be aware of any indication of misconduct, with no retaliation to any complaint made in good faith conduct, and encouraging the use thereof by internal and external Stakeholders.

Use specific communication methods, such as websites, e-mails, events, reports, meetings, presentations and hotlines, with any Stakeholders, to ensure the disclosure and understanding of information applicable to each of them.

4.1.7 Complaint and Ombudsperson

Ideally, we should expose our concerns directly to our managers. However, there are circumstances where we do not feel comfortable communicating the problem in this way.

For circumstances like these there must be a Complaint and Ombudsperson Channel available, which must also secure Claimant's anonymity.

Any complaints and ombudsperson reporting will be handled in accordance with specific internal procedures in force at Petronect.

4.1.8 Training and Awareness

Disseminate this Policy rules to all Employees, in an effective and continuous manner, with the support of the Management, either through training or other means of awareness.

4.1.9 Misconduct and Disciplinary Sanctions

Establish proportional measures of accountability applicable to the cases of fraud, corruption, moral and sexual harassment, property and/or nonpecuniary damage, including those relating to Information Security, nepotism, conflict of interest, and any others considered inappropriate in the work environment pursuant to Petronect's specific internal procedures in force.

4.1.10 Corruption

It must be committed to an ethical posture and professional integrity, to be reflected in its mechanisms for preventing fraud, corruption and money laundering. To this end, the company undertakes to maintain and monitor controls, in accordance with applicable legislation and best practices in its sector. In addition, support and collaborate with the public authorities in any investigation of suspected irregularity or violation of the law.

Promote transparency and observe internal procedures, contributing to everyone's commitment to strengthening an environment of integrity, including preventing and combating fraud and corruption, with zero tolerance for any type of misconduct.

4.1.11 Competition

Observe and prevent violations against the economic order, both in the context of contacts between competitors, whether directly or through class associations, and in terms of the company's commercial practices.

Do not allow the practice of any conduct that results in deviations from Law No. 12,529/2011 ("Law for the Defense of Competition") and prohibits any business practices that result in violation of the economic order.

It is prohibited to share any strategic and competitively sensitive information with competitors, as well as to establish any type of agreement, combination, manipulation or adjustments with competitors regarding price leveling, sales, standardization of contractual clauses, remuneration, market division, discount policy, or even about any commercial strategies for approaching customers or suppliers.

5. PERSONNEL TRAINED ON THIS STANDARD

All Petronect employees and other interested parties.

6. MEASUREMENT AND ASSESSMENT

Not applicable.

7. CONTINGENCY ACTION

Not applicable.

8. VERSION HISTORY

1. Original
2. Update of items 3 and 4, and inclusion of items 4.1.10 and 4.1.11
3. Atualização do item 4.1.10 visando inserir "apoio e colaboração" aos poderes públicos