



ZERO TOLERANCE

**BUSINESS
INTEGRITY,
ANTI-CORRUPTION
AND ANTI-BRIBERY
POLICY**





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01 ANTI-CORRUPTION AND ANTI-BRIBERY POLICY STATEMENT AND COMPLIANCE PROGRAMME

SURPETROL, declares this **global policy for its officials and offices** that are established independently of where they reside or where their business is conducted, always **committed to conducting business with honesty, integrity, honesty and responsibility.**

We have a **responsibility to comply with all applicable laws of the countries where we do business.** This includes compliance with the local anti-corruption laws and regulations of any country where business is conducted or conducted for **SURPETROL**; as well as the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Anti-Bribery Act, the Organization for Economic Cooperation and Development (OECD) Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and similar local laws of other countries and territories.

SURPETROL's Corporate Management is responsible for ensuring that employees under its supervision and authority comply with this policy.

02 OBJECTIVE

SURPETROL is committed to adhere to the highest ethical standards and to comply with the particular international and transnational laws and regulations on anti-corruption and anti-bribery. Therefore, its Legal Representatives as Senior Managers of the Company issue the following Compliance Policies for the prevention of bribery and corruption.

The purpose of these policies is to mark a route of compliance with the regulations to prevent the risks related to bribery and corruption to all partners, employees and/or contractors that carry out activities for or on behalf of SURPETROL, thus achieving that **SURPETROL** is aligned in its activities with all applicable rules and regulations against corruption and bribery. Clarifying that **SURPETROL** has zero tolerance for any conduct that could be considered a bribe or that could, in any way, be considered corrupt.



03 SCOPE

It applies to the company's senior managers, associates, employees and/or contractors, understood as contractors, those suppliers who carry out any activity on behalf or in representation of **SURPETROL**, commercial agents and/or customs agents, all these subjects included in the scope of these, must manifest their knowledge and acceptance with respect to their obligation to comply with the rules related to the prevention of Bribery as well as the Guidelines of Conduct and Business Ethics and this document containing the Compliance Policies, This written statement will be made according to the documents that apply to each class of subject, that is to say, through the commercial contract, labor contract or document where their legal relationship with **SURPETROL** is instrumented.

“Adherence to **Anti-Corruption and Anti-Bribery Policy and Programme Compliance**”

04 GENERAL PRINCIPLES AND GUIDELINES

SURPETROL, its officers and/or contractors adopt the following:

The values and principles that frame **SURPETROL's** activity are

- Respect, Responsibility, Service, Humility and Honesty.
- **SURPETROL** prohibits and sanctions any kind of conduct related to bribery or corruption.
- Any Employee, Senior Manager and/or Contractor of the Company who suspects or has knowledge of **any corrupt or bribery conduct shall report such conduct to the Compliance Officer or report it to the Ethics Line.** The Compliance Committee will respond appropriately to the reports and suggest actions to be taken according to the procedure established in this Policy and in the Code of Ethics, Conduct and Sanctions Regime for cases of Conflict of Interest.
- If an **Employee, Senior Manager and/or Contractor receives a request for a bribe or suspicious payment** from any person or entity, internal or external, this request **must be reported immediately to the Compliance Officer or reported to the Ethics Line.**
- **Any Employee, Senior Manager and/or Contractor of the Company who reports in good faith a violation of the Policy, or the commission of any corrupt or bribery-like conduct, will be protected against any form of retaliation.**
- The rules set forth in this Policy regarding mechanisms for the prevention of corruption or bribery are mandatory and must be observed in every act.

- SURPETROL shall refrain from receiving or making donations that have no lawful purpose or about which there is suspicion that they will serve to cover up corruption or bribery or to obtain advantages in SURPETROL's business. **Donations will only be made to non-profit entities.**
- SURPETROL will carry out the due diligence to adequately know the potential suppliers or agents and, in particular, the linkage of the suppliers or agents with government entities or government officials. For this purpose, the **rules, objectives and principles regarding the connection of suppliers and agents indicated in the Purchasing procedure shall be applied.**
- SURPETROL will monitor any questionable transaction or activity that may reasonably lead to suspect that suppliers or agents are using SURPETROL to transfer, handle, take advantage of or invest money or resources from criminal activities, as well as to carry out acts of corruption or bribery.
- Employees, Senior Managers and/or Contractors of the Company acting on behalf of or in the name of SURPETROL are prohibited from engaging in conduct tending to conceal, change, omit or misrepresent accounting records to conceal improper activities.

05 ACTS OF CORRUPTION

The following are considered acts of corruption:

- | | |
|--------------------------|---|
| 1. Abuse of office; | 8. Extortion; |
| 2. Abuse of functions | 9. Fraud; |
| 3. Bribery; | 10. Intimidation; |
| 4. Collusion | 11. Bribery; |
| 5. Concusion | 12. Influence peddling; |
| 6. Conflict of interest; | 13. Misuse or disclosure of privileged information; |
| 7. Cover-up; | |

06 INAPPROPRIATE PRACTICES

SURPETROL considers inappropriate and improper practices:

1. Payments for Facilitation.
2. Business courtesies, gifts, meals, entertainment.
3. Third Party Representatives & Joint Ventures (Business Partners).

07 DONATIONS AND POLITICAL CONTRIBUTIONS

SURPETROL, nor the Representatives, employees and/or senior management of the Company may make contributions or donations, directly or indirectly, to political parties, government entities, organizations, government officials or individuals involved in politics, without the approval of the President's Committee. Donations or contributions cannot be made in exchange for obtaining advantages in SURPETROL's business or in its transactions of a commercial nature.

08 CODE OF CONDUCT AND ETHICS

To do so, they must adhere to this Code in accordance with the principles of expected conduct in accordance with the Code of Ethics:

- | | |
|------------------------------------|-------------------|
| 1. Respect | 5. Loyalty |
| 2. Equality and non-discrimination | 6. Responsibility |
| 3. Effectiveness | 7. Legality |
| 4. Honesty | 8. Impartiality |
| | 9. Integrity. |

09 SANCTIONS

Company Representatives, employees, senior management and/or contractors who violate these Policies and/or the Business Ethics Program shall be subject to sanctions and disciplinary measures, including dismissal with just cause in accordance with the provisions of the Internal Labor Regulations and the Federal Labor Law, without prejudice to any legal actions that may be taken for this reason. **SURPETROL** shall apply the disciplinary measures in a fair and prompt manner and in proportion to the violation.

By decision of the Board of Directors, after a pronouncement by the Compliance Officer, **SURPETROL** shall inform the competent authorities of any violation of the Anticorruption Regulations that it becomes aware of in the course of its activity.

10 SURPETROL LEGAL DEPARTAMENT

E-mail: lineaetica@surpetrol.com

Phone: +(52) 993-353-4277

We consider that complying with this policy is the responsibility of all our employees.

There will be no retaliation against Employees who report in good faith acts or potential acts of violation of these Policies and/or the Business Ethics Program SURPETROL will not admit false or reckless reports or complaints.

This policy was approved by the Surpetrol Board of Directors, on August 1, 2020.



SURPETROL

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