

# THIRD PARTY CODE OF CONDUCT



DECEMBER 2019

# 1 Pluspetrol's Values

Since its establishment, Pluspetrol's values synthesize the identity and the deepest beliefs about what is essential, and such values constitute guidelines for Pluspetrol and appropriate behaviors that reflect those principles.

The 6 core values of Pluspetrol are:

- To be persistent.
- To think beyond the possibilities and to capitalize on opportunities in spite of the uncertainties.
- To achieve sustainable growth by prioritizing safety, efficient use of resources, operational excellence, community relations and

environmental preservation.

- To be guided by integrity and good practice in our decisions and behavior.
- To work as a team as a way to unleash our imagination and creativity.
- To develop the talent of our human resources while maintaining our identity.

Good business practices are essential to achieve sustainable growth, meeting the expectations of all parties related to Pluspetrol's activity, while maintaining its identity.

# 2 Scope

This Third Party Code of Conduct (hereinafter called the "Code") applies to Pluspetrol's "Third Parties". Third Party shall mean any natural or legal person, who acting on behalf of, for the benefit or in the interest of Pluspetrol provides goods or services at Pluspetrol's request, as well as anyone acting as Pluspetrol's representative, business partner or who is directly related to obtaining, retaining or facilitating business or carrying

out actions related to Pluspetrol, including, but not limited to, suppliers, contractors, subcontractors, consultants, advisers, representatives, any other service provider and business partner. It is worth mentioning that Third Parties play a significant role in achieving Pluspetrol's objectives. Working together promotes the achievement of operational excellence on the basis of the values that identify Pluspetrol.

# 3 Purpose

The purpose of this Code is to evidence the commitment to integrity in business relationships, and to ratify the interest in contributing to economic, social and environmental development in the places where Pluspetrol is present.

For this reason, Pluspetrol requires that its Third Parties adhere to the fulfillment of the principles described in this Code, and also encourages them to share the adherence with the third parties

with whom they are commercially and contractually related, mainly suppliers, contractors and subcontractors, in order to transmit and promote the commitment undertaken with Pluspetrol.

Nothing in this Code shall be understood as a reason or excuse for not complying with the obligations imposed by the legislation or the regulatory framework applicable to Pluspetrol's business or operations.

# 4 Fundamental Principles

## 4.1 Ethics and Good Business Practices

Pluspetrol is firmly committed to promoting ethical and professional behavior in the development of its business, and to adopting an internal control system that accompanies the sustainable growth of the Company. Consequently, our Third Parties shall:

- Work ethically and responsibly discouraging any wrongful act, especially those related to committing fraud, whether through bribery, corruption, embezzlement, extortion and/or any other form, either directly or indirectly, both in the private and public sectors, in any jurisdiction.
- Refrain from offering, promising, paying, authorizing, requesting and/or accepting money or any other form of bribery, with the intention of influencing, inducing, ensuring or appreciating any action, abstention or decision for its own benefit, the benefit of Pluspetrol and/or of any other Third Party during the agreed business relationship.

- Promote measures and mechanisms to prevent, detect and punish the crimes of bribery, corruption, money laundering and/or terrorist financing, according to the identified risks, size and economic capacity of its business.
- Maintain independence and objectivity in the development of business activities with Pluspetrol, reporting any type of identified conflict of interest.
- Compete in an honest, fair and transparent manner in the bidding processes, refraining from using anti-competitive practices.
- Carry out genuine and lawful transactions, avoiding those that seek to conceal the illegal origin of the use of money or to finance or sustain groups outside the law, whether they are terrorists or organized crime.

## 4.2 Human Rights

Pluspetrol understands that the respect and protection of human rights (hereinafter called "Human Rights") require the commitment and participation of the society as a whole.

In this sense, Pluspetrol acknowledges the obligation of companies to comply with the legislation in force, and of parties with specific roles in society, to respect nationally and internationally recognized Human Rights within their framework of action. In line with the above mentioned, Third Parties shall:

- Not use any form of forced labor, or the hiring, directly or through third parties, of child labor, or any other type of abusive labor practice or contrary to the applicable legislation.
- Eliminate all forms of discrimination with and among its employees and third parties, whether on the basis of gender, race, color, religion, nationality, political opinion, sexual orientation, disability, or any other condition that may give rise to any kind of discrimination.

- Adopt preventive and corrective measures to prevent or combat sexual harassment, exploitation, corporal punishments and any treatment that is against the integrity of persons.
- Implement and maintain fair labor practices in accordance with national or international legislation on the matter, ensuring adequate working conditions if such legislation is more beneficial for the employee.
- Provide a safe working environment pursuant to the legislation in force and Pluspetrol's specific requirements.
- Recognize and respect the rights of the indigenous communities and/or vulnerable population as recognized by the applicable legislation and following Pluspetrol's procedures on the matter.
- In those services in which the physical safety is provided by the third party, such safety shall conform to the voluntary principles on human rights for security forces and to Pluspetrol's specific requirements.

## 4.3 Local Communities

Pluspetrol promotes and practices a responsible relationship with local communities, contributes to their general welfare and mitigates the potential impacts of its activities in the areas where it operates. Local communities are one of Pluspetrol's main interest groups, and therefore, Pluspetrol manages initiatives of benefit and shared value with such communities. In order to insure the sustainability of this good relationship, Pluspetrol requires that Third Parties comply with the following guidelines:

- To honor the principles of respect and value assumed by Pluspetrol with its different local interest groups, strictly complying with its community relationship policies and protocols.
- To act with diligence and special care in case of relationships with indigenous communities, given their particular condition of

social vulnerability and cultural rules, in line with the international protection standards that safeguard them.

- To strictly comply with all labor commitments (fair salaries, insurance, personal protection elements, timely payment, etc.) undertaken with local personnel, within the framework of the local labor hiring processes promoted by Pluspetrol.
- To ensure an appropriate behavior in the relationship with local communities eradicating any dishonest behavior that exposes them to illegal and/or criminal acts.
- To avoid contributions, donations, gifts or presents to leaders or representatives of local communities that may cause ethical or other conflicts, contrary to the regulations set forth by Pluspetrol.

## 4.4 Occupational Health

Pluspetrol promotes and practices a "Policy on the Prevention and Treatment of Alcohol and Drug Use" in the workplace in order to:

- Provide safe workplaces, free from risks to health, safety and the environment.
- Promote the prevention and treatment of Alcohol and Drug Use Problems.
- Inform and disseminate the prohibition of using alcohol and drugs in the workplace and/or working under the effects of alcohol and drugs.

For this reason, Third Parties, and if appropriate, their employees and/or subcontractors, operating inside or outside Pluspetrol's facilities shall:

- Refrain from:
  - Holding, consuming, buying, selling or offering alcohol and/or Illegal Drugs or Controlled Substances.
  - Going to work under the effects of alcohol or other substances that affect the physical or intellectual performance.
  - Using alcohol, drugs or any other substance, with or without prescription, which may negatively affect normal work performance, without prior notice to Pluspetrol.
- Encourage that the personnel, suppliers, contractors and subcontractors comply with such regulations.
- Report any situation of actual or potential non-compliance with the guidelines defined in this Code.

## 4.5 Physical, Property, Technological and Information Security

Pluspetrol considers as a fundamental principle to protect persons, facilities, information and the business.

All Third Parties shall be responsible for complying with and enforcing the compliance with the security policies and require-

ments defined by Pluspetrol, and therefore, they shall:

- Take preventive actions in the activities performed in the Company's workplace and in the protection of the property that Pluspetrol makes available.
- Protect their personal property, being under their sole responsibility and care.
- Inform Pluspetrol's Physical and Property Security Sector of any suspicion or potential or actual fact of insecurity (aggression, threat, attack, assault, espionage, extortion, theft, infiltration, intrusion, sabotage, kidnapping, seizure of facilities, vandalism, etc.), safeguarding confidentiality for its treatment and dissemination.

Likewise, Pluspetrol considers as a fundamental principle the same standard of care in the protection of technology and in the prevention of disclosure of the Confidential Information. Consequently, all Third Parties shall:

- Take preventive actions in order to ensure the integrity and availability of the information technology services provided by Pluspetrol, as well as to maintain due protection of the Confidential Information.
- Make available the information technology resources and/or communication systems of the Third Parties in connection with Pluspetrol's systems, for their control and monitoring.

## 4.6 Environment and Safety

Third Parties shall comply with the environmental regulations in force in each site, ensuring that this compliance is maintained in the value chain related to the activities performed for Pluspetrol, minimizing the environmental impact in the sites where they carry out the activities through the use of technologies that diminish emissions and favor the reuse of resources.

Provide a safe working environment, encouraging continuous improvement in this sense; ensuring that their personnel are competent for the task, that they have the proper equipment and are aware and comply with their own safety and environmental regulations and also with those regulations of Pluspetrol that are applicable, and that they have the tools that allow them to contribute proactively to the improvement of the system.

## 5 Non-Compliance

In addition, in case of observing and/or knowing any conduct and/or situation that could potentially constitute a lack of integrity or contrary to good business practices, Pluspetrol has a whistleblower channel called "Ethics Line". This channel is aimed at collaborators, suppliers, clients and other third parties, guaranteeing the confidentiality and the anonymity of the people who decide to use it. It can be accessed through the website <http://ethicslinepluspetrollineaseticas.com>, by email to [ethicsline@pluspetrol.net](mailto:ethicsline@pluspetrol.net) or by calling the following toll free numbers:

- Argentina:** .....0800.122.0441
- Bolivia:** .....8001.0.0985
- Colombia:** .....0180.0752.2263
- United States of America:** .....1.800.304.5395
- Holland:** .....0800.022.5872
- Peru:** .....0800.0.0831
- Uruguay:** .....0004.0529.6681
- Ecuador:** .....1800.00.0364

This tool is available every day for 24 hours, is managed by the international firm KPMG in order to ensure transparency throughout the process.

Therefore, in the event of observing and/or becoming aware of any conduct and/or situation that may potentially constitute a breach of this Code or be contrary to the good business practices set forth therein, Pluspetrol has a complaints channel called "Ethics Line". This channel is available to our Third Parties ensuring the confidentiality and anonymity of those who decide to use it, provided that they act in good faith. The Ethics Line can be accessed through the following website <http://ethicslinepluspetrollineaseticas.com>, by e-mail to [ethicsline@pluspetrol.net](mailto:ethicsline@pluspetrol.net) or by telephone to the following toll-free lines:

This tool, available on a twenty-four-hour daily basis, is managed by the international professional services company called KPMG to ensure transparency throughout the process.

## 6 Glossary

- **Human Rights** are inherent rights to the human condition, pursuant to their recognition by the legislation of each country, or to the international regulations that enshrine internationally recognized Human Rights.
- **Internationally Recognized Human Rights**<sup>1</sup> comprise, at a minimum, the rights established in the International Bill of Human Rights and the principles concerning fundamental rights set forth in the Declaration of the International Labor Organization.

- **Illegal Drugs or Controlled Substances** are all forms of hallucinogens, narcotics, stimulants and drugs whose possession, transfer or use is restricted or prohibited by law.
- **Alcohol and/or Drug Use** is any ingestion or inhalation of alcohol and/or drugs regardless of frequency and intensity (including sporadic or episodic use).
- **Confidential Information** is any technical, financial, tax, legal or any other information owned by Pluspetrol that has been identified as such.

<sup>1</sup> Taken from the UN Guiding Principles on Business and Human Rights. Principle 12 and comments. P. 15-16.