



Anti-bribery and Anti-corruption Policy

SPECIFIC POLICY

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1. Purpose

The purpose of the Anti-bribery and Anti-corruption Policy is to set forth the general guidelines that convey the strong and visible commitment of Pluspetrol to ensure transparency and ethics in the development of business

2. Scope

2.1. Field of application

This Policy is applicable to all Pluspetrol Group companies. In addition, the scope extends to the consortiums in which Pluspetrol is the operator. For the businesses in which Pluspetrol is not the operator, all parties are required to comply with the applicable anti-corruption legislation, and the operator is expected to adopt good corporate anti-corruption practices.

This Policy is applicable to all Pluspetrol Personnel, regardless of their hierarchy, the Personnel of the subsidiaries of Pluspetrol, and also third parties acting in the name and on behalf of the Company.

2.2. Global Scope

The scope of this Policy is global.

3. Terms, definitions and abbreviations

N/A

4. Responsibility

The Board of Directors and the CEO of Pluspetrol are responsible for guaranteeing the existence of the mechanisms, tools and regulations necessary for compliance with this policy.

Senior management, managers and heads of Pluspetrol are responsible for conveying to their work teams the importance and shared responsibility of all personnel, in compliance with this policy and its related regulations.

5. Development

Pluspetrol is strongly committed to promoting ethical and professional behavior in the management and development of its businesses and adopting a consistent internal organization, which contribute to the sustainable growth of the Company over time.

In accordance with the Code of Conduct and our value of integrity and good practices in our decisions and behaviors, Pluspetrol defines the following principles:

- To prohibit any wrongful act related to bribery or corruption in any form, whether direct or indirect, both in the private and public sector, anywhere in the world.
- Not to tolerate that its personnel or a third party, acting on its behalf or representation, may unlawfully offer, promise, pay, authorize, request or accept money or any other form of bribery with the purpose of influencing, inducing, guaranteeing or thanking corruptly any action, abstention or decision in the workplace.
- Not to admit illegal corrupt business practices, whether for the benefit of Pluspetrol, the party involved or a third party.
- To comply with all the laws, decrees, rules and/or regulations in force in relation to money laundering, anti-terrorism and the fight against bribery and corruption that are applicable to Pluspetrol.
- To adopt measures in order to prevent the crimes of bribery and corruption, according to the identified risks, the size of the business and the economic capacity of each area in which the Company develops or will develop its business.
- To promote the use of the internal complaints channel guaranteeing the independence and confidentiality of those who use it to report any suspicion of potential breaches of this Policy.
- To foster the dissemination, training and commitment of every level of the organization in relation to compliance with this Policy and its related regulations.
- To expect that partners, suppliers, customers, contractors, consultants and any other third party related to the Company, act in a manner consistent with the spirit of this Policy and conduct themselves with integrity in the activities carried out with Pluspetrol.

Any breach of this Policy and its related regulations, will be subject to internal disciplinary measures, including the possible dismissal from employment, without prejudice to other legal actions that may correspond to be brought before the competent administrative or judicial bodies.

6. Related Documents

#	DOCUMENT NAME	CODE	DOCUMENT TYPE
1	Code of Conduct	12.05.01.PR.CR.P.V-00-00_EN	Specific Policy

7. Annexes

N/A