

# Petrobras Response to CHRB Indicators 2019





# INDICATOR: A.1.1 Commitment to respect human rights

#### Indicator description:

The Company publicly commits to respecting human rights across its activities. It must be clear the commitment relates to all internationally recognised human rights, rather than to only one or more selected human rights. This only considers commitments to avoid adverse human rights impacts and does not include philanthropic commitments.

#### ANSWER

Petrobras Social Responsibility Policy approved by the Board of Directors considers the commitment to respecting Human Rights in alignment with UN Guiding Principles on Business and Human Rights. One of the 9 guidelines of this policy presents the commitment to: "Respect human rights, seeking to prevent and mitigate negative impacts on our direct activities, supply chain and partnerships, and fight against discrimination in all forms".

The policy is registered in Petrobras Corporate Standard System which indicates the scope of the policy and responsibilities which in this case is applicable to Petrobras and its wholly-owned and controlled subsidiaries and, to the extent practicable, to affiliates, subject to the resolutions of the management bodies of each company. The Corporate Standard Social Responsibility Terms and Concepts encompasses the definition of Human Rights: "rights set forth in the International Charter of Human Rights, which consists of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights and in the Declaration on Fundamental Principles and Rights at Work of the International Labor Organization - ILO".

Our Code of Ethics, which includes the subsidiaries and affiliates, was revised in 2018 and item VIII. states "The Petrobras System actions are based on respecting human rights internationally recognized in Brazil and in the countries where it operates".

In November 2018, we signed the Open Letter Companies for Human Rights proposed by the Brazilian Human Rights Ministry, Brazilian Attorney General's Office and Brazilian Labor Ministry inspired in the UNGPs in which companies commit to 6 actions to promote Human Rights and protect the rights of people including to adopt a Human Rights programs in all areas of the company, education on Human Rights, value the work of Human Right's defenders and constantly progress activities in Human Rights reporting.

Every supplier when submitting the proposals in our bidding process or before signing any contract with PETROBRAS must present a "Declaration of compliance with the Code of Ethics, Guide of Ethical Conduct and the Social Responsibility Policy of PETROBRAS". All those declarations are part of a clause at the Standard Contract of Service Agreement.

In December 2018, there was a review of the EPC contracts, construction and assembly of refining process units and Stationary Production Units (UEPs), and civil construction service agreements. Agreements signed as of 2019 will include a new social responsibility statement clause. According to the new clause, contractors must state and ensure that they respect internationally recognized human rights, as established in the International Bill of Human Rights,

the International Labor Organization Declaration on Fundamental Principles and Rights at Work, the Guiding Principles on Business and Human Rights and the Decree No. 9571 of November 21, 2018, which establishes the Brazilian Guidelines on Business and Human Rights. Moreover, the contract clause, declaratory in nature, must include contractor's commitment to the following itens:

• Formal policy regarding the respect for Human Rights and disseminate to its stakeholders;

• Refrain from using child labor and slave labor or degrading labor conditions, as well as include a specific clause in this sense in agreements signed with suppliers of inputs and/or service providers;

 $\cdot$  Safe and healthy work environment that includes adequate food, accomodation and sanitary conditions;

• Respect the right of its employees to form or join trade unions and to bargain collectively;

• Commit to equal treatment and non-discrimination;

 $\cdot$  Do not practice or agree to any form of sexual exploitation of children and adolescents through employee awareness to fight this violence;

 $\cdot$   $\,$  Do not practice acts that create excessive force in the interaction between security forces, communities and workers;

• Communication channel to receive, forward and respond to manifestations of stakeholders, ensuring that all manifestations are answered and there are no retaliations;

• Assess the social risks of its activities in surrounding communities, identifying, preventing and mitigating adverse impacts on human rights issues (indigenous peoples and traditional communities, socially vulnerable groups, access to livelihoods and a healthy environment, right to integrity and safe environment, land management and resettlement);

• Communicate to surrounding communities the activities that impact their daily lives, in order to minimize impacts/risks;

• Make efforts to hire local labor;

• Repair any damages caused to communities.

We disclosure in our Sustainability Report 2018 our commitments to Human Rights (page 33), our process to identify and treat main social risks and human rights issues (pages 33-34), community relationship strategies (pages 74-76) our actions related to diversity and fighting against discrimination (pages 34-40), our human rights training (page 38), our social responsibility requirement for suppliers (page 39), relation to indigenous peoples and traditional communities (page 41), human rights promotion on social investment (page 42).

# **EVIDENCES**

http://www.petrobras.com.br/en/society-and-environment/society/social-responsibilitypolicy/

http://www.petrobras.com.br/en/about-us/profile/compliance-ethics-and-transparency/ page 3

2018 Sustainability Report http://www.petrobras.com.br/en/society-andenvironment/integrated-report/ pages 33-42; 74-76

# INDICATOR: A.1.2 Commitment to respect the human rights of workers

# Indicator description:

The Company publicly commits to respecting the principles concerning fundamental rights at work in the eight ILO core conventions as set out in the Declaration on Fundamental Principles and Rights at Work (see Table 15), together with those human rights of workers that are particularly relevant to its industry. It also has a publicly available statement of policy committing it to respect the human rights of workers in its business relationships.

# <u>ANSWER</u>

Our CEO expresses our commitment to UN Global Compact annually at our Sustainability Report since 2003.

The Petrobras Social Responsibility Policy approved by the Board of Directors considers the commitment to respecting Human Rights in alignment with UN Guiding Principles on Business and Human Rights. One of the 9 guidelines of this policy presents the commitment to: "Respect human rights, seeking to prevent and mitigate negative impacts on our direct activities, supply chain and partnerships, and fight against discrimination in all forms".

The Corporate Standard Social Responsibility Terms and Concepts encompasses the definition of Human Rights: "rights set forth in the International Charter of Human Rights, which consists of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights and in the Declaration on Fundamental Principles and Rights at Work of the International Labor Organization - ILO".

Our Code of Ethics, which includes the subsidiaries and affiliates, was revised in 2018 and item VIII. states "The Petrobras System actions are based on respecting human rights internationally recognized in Brazil and in the countries where it operates".

Regarding labor practices our Code of Ethics states:

Item 2.5 - acknowledge the right of free association of its employees, respecting and valuing their participation in unions and not doing any kind of negative discrimination against unionized

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employees; => refers to ILO fundamental Convention #1: Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87);

Item 2.6 - pursuit permanent reconciliation of interests and realization of rights, through institutional channels of negotiation, in its relationship with the unions representing the employees => refers to ILO fundamental Convention #2. Right to Organise and Collective Bargaining Convention, 1949 (No. 98);

Item 2.8 - respect and promote diversity and combat all forms of prejudice and discrimination, through transparent admission, training, career advancement, rise to positions, and resignation policy. No employee or potential employee will receive discriminatory treatment a result of its race, skin color, ethnic origin, nationality, social status, age, religion, gender, sexual orientation, personal appearance, physical, mental or psychological condition, marital status, belief, political opinion, or any other individual differentiation factor;

Item 2.9 - promote equal opportunities for all employees, in all policies, practices and procedures, use as sole criterion for professional growth the individual merit based on assessment of performance, and ensure their right to know and be represented in the drafting of the functional evaluation and progress criteria; (both on page 18) => refers to ILO fundamental Convention #8. Discrimination (Employment and Occupation) Convention, 1958 (No. 111).

Our Code o Ethics also states:

4. Regarding relation with Business Partners, Suppliers, Service Providers and Trainees, Petrobras System undertakes to:

4.1. make available to employees of service providers and trainees of Petrobras System, when operating in its facilities, the same healthy and safe conditions at work offered to its employees;

4.3. require to the service providers that their employees comply with the ethics principles and commitments defined in this Code, while contracts with System companies are in force;

4.4. select and hire suppliers and service providers based on criteria strictly legal and technical of quality, cost and timeliness, and demand an ethics profile in their management and social and environmental responsibility practices, refusing unfair competition, violation of human rights, child labor, forced or compulsory labor practices, and other practices contrary to the principles of this Code, including the production chain of such suppliers.

It is important to remark that our Ethics Code covers the members of Boards of Directors, Fiscal Councils, Executive Boards, the occupants of managerial functions, employees, trainees and service providers of Petrobras system, as individual and collective commitment of each and all of them to comply with it and promote its compliance in all actions of the productive chain of Petrobras System and in its relations with all interested parties. The violation of their principles and commitments expressed may result in the adoption of disciplinary measures, in accordance with the standards of the companies comprising Petrobras System. We submit the Ethics Code to periodic reviews, under the oversight of Petrobras' Ethics Committee, with transparency and interested parties participation. The. Ombudsman agencies or instances eventually responsible for processing complaints of ethics transgressions will preserve the anonymity of the complainant, in order to avoid retaliation against them and it will notice them of the measures taken.

Every supplier when submitting the proposals in our bidding process or before signing any contract with PETROBRAS must present a "Declaration of compliance with the Code of Ethics, Guide of Ethical Conduct and the Social Responsibility Policy of PETROBRAS". All those declarations are part of a clause at the Standard Contract of Service Agreement.

In December 2018, there was a review of the EPC contracts, construction and assembly of refining process units and Stationary Production Units (UEPs), and civil construction service agreements. Agreements signed as of 2019 will include a new social responsibility statement clause. According to the new clause, contractors must state and ensure that they respect internationally recognized human rights, as established in the International Bill of Human Rights, the International Labor Organization Declaration on Fundamental Principles and Rights at Work, the Guiding Principles on Business and Human Rights and the Decree No. 9571 of November 21, 2018, which establishes the Brazilian Guidelines on Business and Human Rights. Moreover, the contract clause, declaratory in nature, must include contractor's commitment to the following itens regarding labor practices:

- Refrain from using child labor and slave labor or degrading labor conditions, as well as include a specific clause in this sense in agreements signed with suppliers of inputs and/or service providers;
- Safe and healthy work environment that includes adequate food, accomodation and sanitary conditions;
- Respect the right of its employees to form or join trade unions and to bargain collectively;
- Commit to equal treatment and non-discrimination;
- Communication channel to receive, forward and respond to manifestations of stakeholders, ensuring that all manifestations are answered and there are no retaliations;
- Make efforts to hire local labor;

# EVIDENCES:

# http://www.petrobras.com.br/en/about-us/profile/compliance-ethics-and-transparency/ pages 4-5

2018 Sustainability Report http://www.petrobras.com.br/en/society-andenvironment/integrated-report/ pages 3; 39-42

http://www.investidorpetrobras.com.br/en/annual-reports/integrated-report/sustainability - 2016 Sustainability Report page 4, 2017 Sustainability Report page 3

http://www.petrobras.com.br/en/about-us/careers/labor-practices/

# INDICATOR : A.1.3 Commitment to respect human rights particularly relevant to the industry

#### Indicator description:

The Company publicly commits to respecting human rights and ensures that its business relationships respect the human rights of particular relevance to communities' livelihoods, security and health, including the right to water and the ownership or use of land and natural resources. In addition, the Company publicly commits to respecting the human rights of individuals belonging to specific groups or populations that require particular attention (for example, women, children, indigenous peoples, minorities, persons with disabilities, or migrant workers and their families - see Table 16), where they may be at heightened risk of becoming vulnerable or marginalized if adversely impacted by the Company's activities or its business relationships.

#### ANSWER

At Petrobras Social Responsibility Policy guidelines, we commit to:

- Identify, analyze, and mitigate social risks related to the interaction of our business, society and the environment and promote the social and environmental management in our supply chain.
- Integrate social responsibility issues into our business management and decision-making process.
- Respect human rights, seeking to prevent and mitigate negative impacts on our direct activities, supply chain and partnerships, and fight against discrimination in all forms.
- Manage our relationship with nearby communities on a continuous and transparent basis, contributing to our businesses and to local development.
- Invest in socio-environmental projects, contributing to nearby communities, and society as a whole, in alignment with our business objectives as well as collaborating to environmental conservation and livelihoods improvement.

In our Corporate Standard of Social Risks' Management we consider the following dimensions for identification and risk analysis related to our operations and nearby communities: indigenous peoples and traditional communities, socially vulnerable groups, access to livelihoods and health environment, right to integrity and security, labor practice at the supply chain, infrastructure and public services, education and professional qualification, income generation and jobs opportunities, technological development and access to technology. In the last two year, we enhanced our process of structuring and systematizing community relationship activities around our Operational Units. We carried out communities assessments considering the social context surrounding our operations. The criteria used to assess the communities are: impacts and risks of the Operational Unit to the community, daily interferences, proximity to pipeline ranges or other operational assets; Living conditions of communities, (access to public services:health, education, transportation, leisure areas); conflicts existence; social actors and presence of indigenous peoples and traditional communities. Those assessments are an important tool for managing community relationships insofar as it facilitates the systematization of our information about communities, our operations and their interrelationships. In all, 23 assessments were produced where information gathered served as inputs that were used in the respective community relationship plans. Thus we prepared 23 community relationship plans



addressing the communities present in the scope of our operational units in the Brazilian territory.

In our relationship with indigenous peoples, quilombola communities and other traditional communities, we observe the provision in the Brazilian National Policy of Development of Indigenous Peoples and Traditional Communities (Decree Number 6,040/07), the Normative Instructions and Interministry Ordinance of each body in charge, in this case, the National Indigenous Foundation - FUNAI, the Palmares Cultural Foundation (FCP) and the National Historic and Artistic Heritage Institute (IPHAN); abroad we follow the applicable legislation.

In December 2018, there was a review of the EPC contracts, construction and assembly of refining process units and Stationary Production Units (UEPs), and civil construction service agreements. Agreements signed as of 2019 will include a new social responsibility statement clause. According to the new clause, contractors must state and ensure that they respect internationally recognized human rights, as established in the International Bill of Human Rights, the International Labor Organization Declaration on Fundamental Principles and Rights at Work, the Guiding Principles on Business and Human Rights and the Decree No. 9571 of November 21, 2018, which establishes the Brazilian Guidelines on Business and Human Rights. Moreover, the contract clause, declaratory in nature, must include contractor's commitment to the following itens regarding communities:

- Formal policy regarding the respect for Human Rights and disseminate to its stakeholders;
- Do not practice or agree to any form of sexual exploitation of children and adolescents through employee awareness to fight this violence;
- Do not practice acts that create excessive force in the interaction between security forces, communities and workers;
- Communication channel to receive, forward and respond to manifestations of stakeholders, ensuring that all manifestations are answered and there are no retaliations;
- Assess the social risks of its activities in surrounding communities, identifying, preventing and mitigating adverse impacts on human rights issues (indigenous peoples and traditional communities, socially vulnerable groups, access to livelihoods and a healthy environment, right to integrity and safe environment, land management and resettlement);
- Communicate to surrounding communities the activities that impact their daily lives, in order to minimize impacts/risks;
- Make efforts to hire local labor;
- Repair any damages caused to communities.

#### **EVIDENCES**

# http://www.petrobras.com.br/en/society-and-environment/society/social-responsibilitypolicy/

2018 Sustainability Report http://www.petrobras.com.br/en/society-andenvironment/integrated-report/ pages 33-34; 39; 74



# INDICATOR : A.1.4 Commitment to engage with stakeholders

#### Indicator description:

The Company publicly commits to engage with its stakeholders, including potentially and actually affected stakeholders and their legitimate representatives.

#### ANSWER

In our Petrobras Social Responsibility Policy we commit to interact responsibly with communities, to manage our relationship with nearby communities on a continuous and transparent basis and to invest in voluntary social projects, contributing to local communities and society as a whole, in alignment with our business objectives as well as collaborating to environmental conservation and livelihoods improvement.

The Corporate Standards for Community Relationship Management and Corporate Standard Diagnosis and Analysis of the Community provides guidelines to manage community relationship in areas that are or may be affected by Petrobras' activities. Broadly, these guidelines are presented in the following steps: assessement and analysis; planning; execution; monitoring and evaluation; and revision. "Diagnostics and analysis step" maps municipalities and nearby communities. The product of this step is a "Assessment and Analysis of Communities Report", which includes the context, points of attention and recommendations for planning the relationship with the community.

The assessment and analysis process are based in international norms and references such as ISO 26000 (2010), AA 1000, PMBOK (2013), Community Relation ToolKit - ICMM (2015), Community Relations Management System - ARPEL (2009). This methodology is based in concepts such as: PDCA, community focused, diagnosis-analysis concept, and social actors mapping.

The assessment and analysis approach considers potential impact and / or risk of our activities such as:

a) impacts and risks of the Operational Unit to the community, such as proximity to the iso risk curve, daily interferences, proximity to pipeline ranges or other operational assets, among other factors;

b) Living conditions of communities, including access to public services (health, education, transportation, leisure areas);

- c) Conflicts existence;
- d) Social actors; and
- e) Presence of indigenous peoples and traditional communities.

The methodology establishes 4 different levels of engagement (inform, consult, engage and commit) identifying the current engagement level of each community and the level of engagement indicated. Thus are established initiatives that integrate the Annual Plan of Community Relationship.

In all, twenty-three assessments were produced, eighteen in 2018, and another five in 2017, where information gathered served as inputs that were used in the respective community relationship plans. Thus we prepared 23 Community Relationship Plans addressing the communities present in the scope of our Operational Units in the Brazilian territory.

The Community Relationships Plans were prepared by multidisciplinary teams who have community interface responsibilities and were approved by the highest hierarchical managers

of each Operational Unit. This led to the strategic alignment of social responsibility actions with Petrobras' business plan, considering the interests of the communities where we operate.

The actions included in the plans seek to address issues of common interest in five processes: a) community relations (eg visits, grievances and complaints, spaces for dialogue); b) preparation of communities to emergencies (emergencies exercises); c) conflict resolution; d) social and environmental projects; e) involvement of the workforce in community relationships actions.

In addition to the Community Relationships Plans, our engagement with the communities surrounding our Operational Units takes place in several ways: spaces for dialogue, community leadership visits to the Operational Units, lectures, training, emergency exercises, visits of our teams to the communities, among others. In 2018, 65 meetings of community committees and 568 visits to the communities were held. We consider the Community Committees, voluntary dialogue spaces, one of the most important engagement processes with communities.

Currently, we coordinate 13 community committees surrounding Units coverage areas. In these communities, we deal with issues of common interest that are related to our activities and the interests of the communities, such as: risks of operations and emergency exercises preparedness, communication of results of social and environmental projects, dissemination of national campaigns and other relevant issues

The target audiences of the community committees are communities' social actors, such as formal, informal leaderships, residents' association, traditional communities as well as public spheres, civil society institutions, opinion formers. Some of these forums also include representatives of public institutions or agencies, such as Municipal Secretariats (health, education, environment, social assistance, among others); Civil defense; Fire Department; cooperatives; educational institutions; nurseries and local press.

Some examples of issues addressed in Community Committees throughout 2018:

- Safety in relation to Petrobras activities (training for emergency evacuation), human rights (for children and adolescents, women and the elderly), alcohol and other drugs, housing, environmental education, urban cleaning, domestic security, child exploitation, business management, employment generation and income;
- Health, recyclable waste, air quality, flare operation (noise, smoke and odor), HSE indicators, refinery contingency, tax collection, environmental degradation (trees mortality), urban cleaning, sanitation, technical training, housing, public selection , general reports;
- Provision of local labor in companies where possible, local improvements, concerns about the impact of companies on community health, safety and environment, water use and demands for support in dealing with public authorities;
- Toll free (SAC) registrations, demands for capacity building, absence of leisure options for children and young.

We engage with civil society organization by supporting their projects as part of Petrobras Social and Environmental Corporate Program. The Petrobras Socio-Environmental Program supports social and environmental projects, promoting human rights and establishing as priority targets: Indigenous Peoples, Traditional Peoples and Communities, Women, Black People, Children and Adolescents, Youth and People with Disabilities. The program also considers the "Respect for human rights and fight against discrimination" a cross-cutting issue, considering the following sub-topics: gender equality, ethnical and racial equality, and the inclusion of people with disabilities.



The current portfolio of the Program, comprised of 100 projects, includes 28 environmental projects and 6 social projects that directly benefit indigenous peoples or traditional communities in multiple regions throughout Brazil. The main activities performed include youth training for sustainability, development of an incubator for young entrepreneurs, and development of the social biodiversity product chain, such as chestnut, copaiba, guaraná, latex and handicrafts, and the training of indigenous and extractive communities for sustainable management of their territories. Regarding the topic of ethnical and racial equality, there are 4 social projects within the portfolio that have black people as a priority target and benefit about 1,950 participants. Racial equality is also handled as a cross-cutting topic by 22 social environmental projects that promote, among its activities, workshops, discussions, lectures and roundtables about inequalities and inclusion. With regard to the promotion of gender equality, the program benefits more than 14,000 women through activities such as professional qualification, entrepreneurship, mobilization to fight discrimination, and prevention of violence against women. The program's portfolio directly benefits some 24 thousand children and 26 thousand teenagers. Among its activities, we can highlight educational workshops, school performance improvement, and success in learning aimed at school inclusion, prevention and coping with violence.

#### **EVIDENCES**

http://www.petrobras.com.br/en/society-and-environment/society/social-responsibilitypolicy/

2018 Sustainability Report http://www.petrobras.com.br/en/society-andenvironment/integrated-report/ pages 42, 74- 76; 83-87



# **INDICATOR : A.1.5** Commitment to remedy

#### Indicator description

The Company publicly commits to providing for or cooperating in remediation for affected individuals, workers and communities through legitimate processes (including judicial and non-judicial mechanisms, as appropriate), where it identifies that it has caused or contributed to adverse impacts.

#### ANSWER

We have as commitments in our Code of Ethics:

I. Respect for life and all human beings, integrity, truth, honesty, justice, equity, institutional loyalty, responsibility, zeal, merit, transparency, legality, impersonality, coherence between speech and practice, are the ethics principles that guide the actions of Petrobras System.

IV. The loyalty to Petrobras System manifests as responsibility, zeal and discipline at work and in dealing with all human beings, and with the material and immaterial goods of the System, in fulfillment of its Mission, Vision and Values, by conducts compatible with the execution of its Corporate Strategy, with entrepreneurial spirit committed to overcoming of challenges.

VIII. The Petrobras System actions are based on respecting human rights internationally recognized in Brazil and in the countries where it operates.

4. Regarding relation with Business Partners, Suppliers, Servi ce Providers and Trainees, Petrobras System undertakes to:

4.4. select and hire suppliers and service providers based on criteria strictly legal and technical of quality, cost and timeliness, and demand an ethics profile in their management and social and environmental responsibility practices, refusing unfair competition, violation of human rights, child labor, forced or compulsory labor practices, and other practices contrary to the principles of this Code, including the production chain of such suppliers;

Item 5: Regarding relation with Customers and Consumers, Petrobras System undertakes to: 5.2: fix possible losses from damage under its responsibility to its consumers and customers, with the maximum agility, in enforceable deadlines.

Item 6: Regarding relation with Environment, and as proof of its responsibility concerning current and future generations, Petrobras System undertakes to: 6.3 contribute to the preservation and recovery of biodiversity, through the management of the potential impacts of its activities and projects to protect endangered species and areas; 6.6 invest in the sustainability of its projects, products and services, maximizing their benefits, and minimizing their adverse impacts and monitoring the entire lifecycle of its facilities, operations and products; 6.9 identify, evaluate and manage its environmental liabilities, acting preventively and correctively in the solution of the problems which cause them; 6.10 communicate promptly to its consumers, customers, community and society about possible environmental damages, in the event of accidents; 6.11 provide to its consumers, customers, community, and society information about possible environmental damages resulting from bad use and about the final destination of its products.

Item 7: Regarding relation with the Communities, Petrobras System undertakes to: 7.1 keep permanent channels of communication and dialogue with the communities where it operates, with the purpose to prevent, monitor, evaluate and manage the impacts of its activities; 7.5 fix possible losses from damage under its responsibility to affected people or communities, with the maximum agility.

We have as commitment in our Social Responsibility Policy: guideline 3: "Respect human rights, seeking to prevent and mitigate negative impacts on our direct activities, supply chain and partnerships, and fight against discrimination in all forms." and guideline 6 "Be prepared for emergencies, potential conflicts and crises involving our nearby communities".

Petrobras offers to its workforce and stakeholders the Denouncement Channel under the General Ombudsman Office's management where any deviations may be reported including violations to the exercise of freedom of association and collective negotiation among other issues related to labor practices and human rights.

# **EVIDENCES**

http://www.investidorpetrobras.com.br/en/corporate-governance/governanceinstruments/code-ethics

http://www.petrobras.com.br/en/society-and-environment/society/social-responsibilitypolicy/

http://www.investidorpetrobras.com.br/en/annual-reports/integrated-report/sustainability

2016 Sustainability Report page 77 and 2017 Sustainability Report page 81

https://www.contatoseguro.com.br/petrobras



# INDICATOR : A.1.6 Commitment to respect the rights of human rights defenders

# Indicator description:

The Company publicly commits to not tolerating threats, intimidation, physical or legal attacks against human rights defenders, including those exercising their rights to freedom of expression, association, peaceful assembly and protest against the business or its operations. (See also Indicator C.5).

# **ANSWER**

We establish as requirement of our Guide to Ethical Conduct: 4.1.1 Do not practice, submit to, or condone any act of violence, prejudice, abuse, discrimination, threat, blackmail, perjury, retaliation, psychological abuse, bullying or sexual harassment, or any other act contrary to the ethical principles of the Petrobras System.

We also guarantee of confidentiality and accepts a communication or report of misconduct or of an indication of misconduct made in good faith, and shall not allow retaliation or punishment against any persons making such disclosure or complaint.

Our Ombudsman Office is responsible for processing complaints of ethics

transgressions will preserve the anonymity of the complainant, in order to avoid retaliation against them and it will notice them of the measures taken.

#### **EVIDENCES**

http://www.investidorpetrobras.com.br/en/corporate-governance/governanceinstruments/code-ethics

https://www.investidorpetrobras.com.br/enu/8884/CodigodeEtica2019Ingles.pdf

# INDICATOR : A.2.1 Commitment from the top

#### Indicator description:

The Company's human rights policy commitments are approved and communicated at Board level and a Board member or Board committee is tasked with addressing one or more areas of respect for human rights.

#### <u>ANSWER</u>

The Board of Directors is the higher body of guidance and management of Petrobras, and, according to our bylaws is responsible for setting the general guidance of the business of the Company, defining its mission, strategic objectives and guidelines as well as setting the overall policies of the Company. Our commitment to respect human rights is expressed by the corporate value "respect for life, people and the environment"; is presented in our Code of Ethics and Code of Conduct, which declares Petrobras' ethical principles, including respect for human rights and respect for life in all its forms, , among others; is in our Social Responsibility Policy and also in our Human Resources Policy, which are discussed and approved by the Board of Directors. The Health, Safety and Environment Committee, linked to the Board of Directors, is responsible for the analysis and for advising the board in matters related to strategic safety, environment and health issues and other directives and guidelines related to HSE management the company.

We also have our Petrobras Code of Best Practices, an instrument approved by the Board of Directors to gather all policies related to Company's Corporate Governance. The policies included in this document aim to improve and strengthen Petrobras' Governance mechanisms by providing guidance on the activities of company's directors, officers, managers, employees and collaborators. In addition, it will also contribute to increase rectitude and the degree of knowledge and confidence of investors and other stakeholders regarding such practices adopted internally.

Petrobras Code of Best Practices joins the main governance policies: (i) Relevant Act or Fact Disclosure and Negotiation of Securities Policy; (ii) - Corporate Compliance Policy and Guidelines for Petrobras Group; (iii) - Business Risk Management Policy; (iv) - Ombudsman Function Policy; (v) Shareholders Remuneration Policy; (vi) Appointment Policy for Members of the Audit Committee, Board of Directors, Executive Office and Officers in the General Structure of Petrobras and Petrobras System Companies; (vii) Communications Policy; (viii) - Related Party Transactions Policy; and (ix) - Corporate Governance Policy.

The Executive Board also relies on few committees, composed of executive managers, whit the duty to assist this body on specific matters. Among them, we can highlight the following three committees that have, among their attributions, the responsibility to discuss and advise the Executive Board in subjects related to human resources; safety, environment and health; and social responsibility: The Human Resources, Organization and Governance Committee, the Health, Safety and Environment Committee and the Disclosure, Communication and Social Responsibility Committee.

#### **EVIDENCES:**

http://www.petrobras.com.br/en/society-and-environment/

Integrated Report 2018: <u>https://investidorpetrobras.com.br/en/results-and-notices/integrated-report</u>

Annual Report 2018: <u>https://investidorpetrobras.com.br/en/results-and-notices/integrated-report,</u> pages 108- 111



Sustainability Report 2018 and table contents GRI <u>http://www.petrobras.com.br/en/society-and-environment/integrated-report/</u>pages 33 - 42

#### https://investidorpetrobras.com.br/en/results-and-notices/integrated-report

#### Petrobras' By-laws:

Chapter IV, Section II, Article 29, Subsections, I, II and VII

Chapter IV, Section II, Article 30, Subsection VIII and paragraph 1

https://investidorpetrobras.com.br/en/corporate-governance/by-laws

https://www.investidorpetrobras.com.br/enu/14629/Estatuto-Social-AGOE-25-Abril-2019-Ingles.pdf

Petrobras' Governance Bodies:

https://investidorpetrobras.com.br/en/corporate-governance/management

Board of Directors Committees internal rules (regiments) are available only in Portuguese:

https://investidorpetrobras.com.br/pt/governanca-corporativa/administracao

Health, Safety and Environment Committee Internal Rules (available only in Portuguese):

https://investidorpetrobras.com.br/fck\_temp/1013\_42/file/Regimento%20Interno%20do%20C omit%C3%AA%20de%20Seguran%C3%A7a,%20Meio%20Ambiente%20e%20Sa%C3%BAde.pdf

Social Responsibility Policy: <u>http://www.petrobras.com.br/en/society-and-environment/society/social-responsibility-policy/</u>

Safety, Environment, and Health Policy: <u>http://www.petrobras.com.br/en/society-and-</u>environment/safety-environment-and-health-policies/

Code of Best Pratices and Associated Policies (Corporate Compliance Policy and Guidelines for Petrobras Group; Business Risk Management Policy; Ombudsman Function Policy and Guidelines, among others)

https://investidorpetrobras.com.br/pt/governanca-corporativa/codigos-politicas-e-outros

https://www.investidorpetrobras.com.br/ptb/2/Cdigo%20de%20Boas%20Prticas%20da%20Petrobras%20-%20Junho%202019.pdf

Code of Ethics and Code of Conduct: http://www.petrobras.com.br/en/aboutus/profile/compliance-ethics-and-transparency/

http://www.petrobras.com.br/lumis/portal/file/fileDownload.jsp?fileId=8A0F9B1968CECC850 169BB8EA8087354

http://www.petrobras.com.br/lumis/portal/file/fileDownload.jsp?fileId=8A0F9B1968CECC850 169BB8EA859738B

Public Presentations (Business & Management Plan and general presentations):

http://www.petrobras.com.br/en/about-us/strategic-plan/business-and-management-plan/

#### https://investidorpetrobras.com.br/en/results-and-notices/company-presentations/2018

#### **BMP Material Fact:**

#### http://www.investidorpetrobras.com.br/download/5854

The Board members and the executive office members reinforce Petrobras's commitment with the corporate value "respect for life, people and the environment" on their presentations, speeches as spokespersons, interviews for media, statements reportings, and other relationships with the company's stakeholders.

Additionally, we started, in 2018, our integrated reporting process, which promotes a more cohesive, efficient approach to preparing corporate reports, aiming to improve the quality of the information available to financial capital providers, seeking to explain how the organization generates value over time, and providing subsidies to capital allocation in a more efficient, productive manner. Petrobras Integrated Reporting is comprised of the <u>Annual Report</u>, <u>Sustainability</u> and <u>Financial Statements</u>. The Sustainability Report highlights our performance with information on sustainability, in the social, environmental, and economic dimensions, and aims to present to our stakeholders, with transparency, integration and connectivity, how our organization generates value. In 2018, the report also presents a table content with the correlation with the indicators of the Global Reporting Initiative (GRI), Sustainable Development Goals (SDGs) and principles of the UN Global Compact, including governance indicators and executive-level responsability for economic, environmental and social topics, among others.

All the evidences required for the indicators are described below and can be audited publicly in the management reports for 2016, 2017, 2018 available on Petrobras' Investor Relations website, at: <u>http://www.investidorpetrobras.com.br/en</u>.

Petrobras' By-laws: Chapter IV, Section II, Article 29, Subsection VII

https://investidorpetrobras.com.br/en/corporate-governance/by-laws

https://www.investidorpetrobras.com.br/enu/14629/Estatuto-Social-AGOE-25-Abril-2019-Ingles.pdf

Code of Best Pratices and Associated Policies (Relevant Act or Fact Disclosure and Negotiation of Securities Policy and Communications Policy):

https://investidorpetrobras.com.br/pt/governanca-corporativa/codigos-politicas-e-outros

https://www.investidorpetrobras.com.br/ptb/2/Cdigo%20de%20Boas%20Prticas%20da%20Petrobras%20-%20Junho%202019.pdf

Code of Conduct (items 4.10 and 5): http://www.petrobras.com.br/en/aboutus/profile/compliance-ethics-and-transparency/

http://www.petrobras.com.br/lumis/portal/file/fileDownload.jsp?fileId=8A0F9B1968CECC850 169BB8EA859738B

Public Presentations (Business & Management Plan and general presentations):

http://www.petrobras.com.br/en/about-us/strategic-plan/business-and-management-plan/

https://investidorpetrobras.com.br/en/results-and-notices/company-presentations/2018



BMP Material Fact: http://www.investidorpetrobras.com.br/download/5854

**General Presentations:** 

https://investidorpetrobras.com.br/en/results-and-notices/company-presentations/2018

http://www.petrobras.com.br/en/society-and-environment/

https://www.investidorpetrobras.com.br/ptb/788/ApresentaoPedroParenteltauBBAs13thAnnualIngles.pdf

https://www.investidorpetrobras.com.br/ptb/486/ApresentacaoInvestorDayLondres1209201 8\_Ingles.pdf

Integrated Report 2018: <u>https://investidorpetrobras.com.br/en/results-and-notices/integrated-report</u>

#### **INDICATOR : A.2.2 Board discussions**

#### Indicator description:

The Company has processes in place to discuss and address human rights issues at Board level or the Board or a Board committee regularly reviews the Company's salient human rights issues and provides examples of what was discussed.

#### **ANSWER**

The Board of Directors established six committees with specific assignments to advise it on the fulfillment of its responsibilities of guidance and senior management of Petrobras. Among them the Health, Safety and Environment Committee with specific assignments to analysis and issuance of recommendations related to the strategic issues of safety, environment and health and other guidelines related to the HSE management of the company.

The Health, Safety and Environment Committee is a permanent statutory body, directly linked to Petrobras' Board of Directors, whose purpose is to advise the Board of Directors in the fulfillment of its responsibilities of guidance and superior management of the Company, to the analysis and issuance of recommendations related to the strategic issues of Safety, Environment and Health (HSE) and other directives and guidelines related to HSE Management of the Company, to be submitted to the Board of Directors, as well as identify and analysis of the opportunities and risks related to health, safety and environment and to the discussion of other issues that the Board of Directors deem pertinent to undergo prior consideration by the Committee.

Our Corporate Governance Guidelines also provide face-to-face meetings with senior management and an introductory program for new board members that addresses relevant governance issues, which includes aspects of legislation, disclosure, compliance, conduct, conflict of interests and other topics relevant to our activities, including economic, environmental and social aspects related to geopolitics and the world energy scenario, in the context of the Brazilian market. This program also includes an annual training provided by the Company. The reelection of the Board of Directors member who does not participate in any annual training provided by the Company in the last 2 (two) years is prohibited, in according to our bylaws.

The Executive Board also relies on few committees, composed of executive managers, whit the duty to assist this body on specific matters. Among them, we can highlight the following three committees that have, among their attributions, the responsibility to discuss and advise the Executive Board in subjects related to human resources; safety, environment and health; and social responsibility: The Human Resources, Organization and Governance Committee, the Health, Safety and Environment Committee and the Disclosure, Communication and Social Responsibility Committee.

#### **EVIDENCES:**

Integrated Report 2018:

#### https://investidorpetrobras.com.br/en/results-and-notices/integrated-report

#### Annual Report 2018:

https://investidorpetrobras.com.br/en/results-and-notices/integrated-report\_pages\_108 -111

# Sustainability Report 2018 and table contents GRI <u>2018</u> Sustainability Report <u>http://www.petrobras.com.br/en/society-and-environment/integrated-report/pages 33-42</u>)

https://investidorpetrobras.com.br/en/results-and-notices/integrated-report

#### https://investidorpetrobras.com.br/fck\_temp/1030\_5/file/Sustainability\_2018\_10\_06.pdf

Petrobras' By-laws:

Chapter IV, Section II, Article 18, paragraph 10

Chapter IV, Section II, Article 30, paragraph 1

https://investidorpetrobras.com.br/en/corporate-governance/by-laws

https://www.investidorpetrobras.com.br/enu/14629/Estatuto-Social-AGOE-25-Abril-2019-Ingles.pdf

Petrobras' Governance Bodies:

https://investidorpetrobras.com.br/en/corporate-governance/management

Board of Directors Committees internal rules (regiments) are available only in Portuguese:

https://investidorpetrobras.com.br/pt/governanca-corporativa/administracao

Board of Directors Committees internal rules (Health, Safety and Environment Committee) available only in Portuguese:

https://investidorpetrobras.com.br/fck\_temp/1013\_42/file/Regimento%20Interno%20do%20C omit%C3%AA%20de%20Seguran%C3%A7a,%20Meio%20Ambiente%20e%20Sa%C3%BAde.pdf

Governance Guidelines (under review):

http://www.investidorpetrobras.com.br/en/corporate-governance/governanceinstruments/guidelines



# INDICATOR : B.1.1 Responsibility and resources for day-to-day human rights functions

#### Indicator description:

The Company outlines senior level responsibility for human rights within the Company as well as the organisation of the day-to-day responsibility for human rights across relevant internal functions and geographies.

# <u>ANSWER</u>

Human Rights is a cross cutting issue addressed by several Petrobras' departments in Brazil where 96% of our production is carried out. The Social Responsibility Department is responsible for identifying, analyzing, and mitigating social risks related to the interaction of our business, society and the environment and to promote the social and environmental management in our supply chain; managing our relationship with nearby communities on a continuous and transparent basis and managing the socio-environmental investment, contributing to nearby communities, collaborating to environmental conservation and livelihoods improvement. The Human Resources Department is responsible for matters relating to managing union relations and is responsible to some issues related to decent work, permanent negotiation and dialogue (assignment is describe in the collective labor agreement). We state our commitment to value diversity at the Human Resources Policy and there is a specific area responsible to develop and monitor initiatives that reinforce the respect to human and cultural diversity of the workforce (non-discrimination and equal opportunities). The HSE department is responsible for safety, environment and health activities committing to caring for life and the environment, reducing risk to people's security and health by strengthen process safety and anticipating and responding promptly to emergencies. The HSE department is also responsible for "Commitment to Life" program, which focuses on accident prevention, search of new risk and control solutions. The senior role of each of these departments is carried out by an Executive Manager.

The General Ombudsmen Office is responsible for handling complaints, requests for information, denouncements, requests, queries, opinions, and suggestions from all stakeholders in a confidential, independent, free, and accessible manner. It is linked to Petrobras' Board of Directors and welcomes anonymous denouncements. The Ombudsman's Office interacts with the relevant areas to strengthen and promote the addressing of demands and contributes to the management with recommendations from the knowledge acquired in performing its duties. The senior role of the General Ombudmen office is carried out by the Ombudsman.

#### **Evidences**

http://www.petrobras.com.br/en/society-and-environment/society/social-responsibility-policy/

http://www.petrobras.com.br/en/society-and-environment/environment/safety-environmentand-health-policies/

https://ouvidoria.petrobras.com.br/

http://www.investidorpetrobras.com.br/en/corporate-governance/organization-chart http://www.petrobras.com.br/en/about-us/profile/compliance-ethics-and-transparency/



#### INDICATOR : B.1.3 Integration with enterprise risk management

#### Indicator description:

The Company integrates attention to human rights risks into its broader enterprise risk management system(s).

#### <u>ANSWER</u>

According to our Corporate Risk Policy, which establishes that risks must be assessed in all our decisions, we prepared in 2018 new guidelines for managing social risks

in our activities and in the supply chain, specifying the social responsibility requirements for investment projects. The investment projects - in order to be submitted to pass through gate transition - are evaluated by a multidisciplinary review group that includes specialists in Social Responsibility, Safety, Environment and Health, as well as business areas responsible for the projects, in addition to other areas. The recommendations for project gate transition consider the social context of communities and include actions to mitigate social risks, such as the promotion of human rights, among others.

Were carried out 41 social risk assessments in projects along 2017-2018, of which 19 in 2018. Due to the profile of our activities, social issues identified are related to livelihoods of fishermen and traditional communities are identified, as well as potential impacts on tourism activity and access routes, the respect for human rights in the supply chain, among others.

The analysis results in recommendations that include reviewing emergency response plans in the light of community relations, monitoring community claims and complaints, publicizing projects and operational activities, and including social responsibility clauses in contracts.

Morever, in 2017 and 2018 we also enhance our process of structuring and systematizing community relationship activities around our Operational Units. We carried out communities assessments considering the social context surrounding our operations. Those assessments are an important tool for managing community relationships insofar as it facilitates the systematization of our information about communities, our operations and their interrelationships. In all, 23 assessments were produced where information gathered served as inputs that were used in the respective community relationship plans. Thus we prepared 23 community relationship plans addressing the communities present in the scope of our operational units in the Brazilian territory.

#### **EVIDENCES**

<u>2018 Sustainability Report http://www.petrobras.com.br/en/society-and-environment/integrated-report pages : 33 - 34, 74-76</u>



# INDICATOR : B.1.4.a Communication/dissemination of policy commitment(s) within Company's own operations

# Indicator description:

The Company communicates its human rights policy commitment(s) to employees and other workers as well as to external stakeholders, in particular potentially affected stakeholders. Note: In order to get any Score under this indicator, the human rights policy commitment must include the ILO core labour standards at a minimum. If a company clearly commits to the ILO Declaration on Fundamental Principles and Rights at Work, this will be accepted as including the four ILO core labour standards. If a company commits to the UN Global Compact alone, this will not count as including the ILO core labour standards unless the company chooses to list out each of the UN Global Compact principles. This is because for communication, training, and monitoring purposes, clarity of message is important. If in doing so a company only explicitly refers to less than all four UN Global Compact labour rights principles then this will not meet the requirement to score 1 or 2 for these indicators.

# <u>ANSWER</u>

All employees must read and sign a declaration of knowledge of the Code of Ethics and the Guide of Conduct. We annually list the UN Global Compact Principles at our Sustainability Report correlating the GRI standards to UN Global Compact Principles. Our Social Responsibility Policy, which contains our commitment to respect Human Rights, was launched in March 2017 and we published a briefing note on our internal website. The Social Responsibility Policy is also available in our external website and was published at our 2016 and 2017 Sustainability Report. In September 2017, we launched the new Human Resources Policy, including a specific diversity topic and we published a briefing note in our internal website. We also publish our labor practices related to human rights in our external website mentioning specific topic as follows: Rejection of child, slave, and degrading labor throughout our supply chain (Forced Labor Convention, 1930 - No. 29) and Equal opportunities, respecting gender differences and diversity of cultures, knowledge and skills, right to social security benefits and medical assistance for same-sex partners, 180-day maternity leave (Employment and Occupation Convention, 1958 -No. 111 and Convention 103). In the sustainability report for the year 2018 the Health and Safety initiatives and indicators can be found on pages 03 (CEO message), 05(Highlights) and 43 to 44 (Ethics and Tranparency).

The theme of Human Rights is addressed in all the training courses for new employees. In addition, the topic was addressed in the Code of Ethics and Conduct of Conduct training provided to the entire workforce (holding employees, outsourced employees and requisited employees from subsidiaries). This training has not been translated into other languages. This course is available for the entire Workforce on a regular basis.

In Petrobras website our communication of policies are available for all our stakeholders (Portuguese and English). The Code of Ethics and Conduct training program included 12,970 participants from service providers (outsourced employees) and 657 participants from other companies in the Petrobras system (requisited employees from subsidiaries). For those who were

not been trained in 2017, we also offer distance training addressing the Petrobras System's Code of Ethics and the Guide to Conduct, with the attendance of employees of subsidiaries. The online course had 2,940 employees trained and approved in 2018.

We have started a continuous cycle of mandatory training, called "Commitment to Compliance Trail," which will help employees to identify compliance risks and how to act in those situations. The training is conducted in the Distance Learning method, and involves senior management, managers, consultants and employees of all careers. In 2018, more than 40,000 employees were trained. In addition to being in accordance with the best practices in compliance, the initiative follows legal determinations and guidelines of regulators.

In Petrobras website our communication of policies are available for all our stakeholders (Portuguese and English).

Moreover, our engagement with the communities surrounding our Operational Units (OU) takes place in several ways: spaces for dialogue, community leadership visits to the OU, lectures, training, emergency exercises, visits of our teams to the communities, among others. In 2018, 65 meetings of community committees and 568 visits to the communities were held. We consider the Community Committees, voluntary dialogue spaces, one of the most important engagement processes with communities. Currently, we coordinate 13 community committees surrounding Units coverage areas. In these communities, we deal with issues of common interest that are related to our activities and the interests of the communities, such as: risks of operations and emergency exercises preparedness, communication of results of social and environmental projects, dissemination of national campaigns and other relevant issues.

The target audiences of the community committees are communities' social actors, such as formal, informal leaderships, residents' association, traditional communities as well as public spheres, civil society institutions, opinion formers. Some of these forums also include representatives of public institutions or agencies, such as Municipal Secretariats (health, education, environment, social assistance, among others); Civil defense; Fire Department; cooperatives; educational institutions; nurseries and local press.

Some examples of issues addressed in Community Committees throughout 2018:

Safety in relation to Petrobras activities (training for emergency evacuation), human rights (for children and adolescents, women and the elderly), alcohol and other drugs, housing, environmental education, urban cleaning, domestic security, child exploitation , business management, employment generation and income;

- Health, recyclable waste, air quality, flare operation (noise, smoke and odor), HSE indicators, refinery contingency, tax collection, environmental degradation (trees mortality), urban cleaning, sanitation, technical training, housing, public selection, general reports;
- Provision of local labor in companies where possible, local improvements, concerns about the impact of companies on community health, safety and environment, water use and demands for support in dealing with public authorities;
- Toll free (SAC) registrations, demands for capacity building, absence of leisure options for children and young;



# **EVIDENCES**

http://www.petrobras.com.br/en/society-and-environment/society/social-responsibilitypolicy/http://www.petrobras.com.br/en/about-us/careers/labor-practices/

2018 Sustainability Report <u>http://www.petrobras.com.br/en/society-and-environment/integrated-report</u> pages 33-34, 74-76

http://www.investidorpetrobras.com.br/en/corporate-governance/governanceinstruments/code-ethics

# INDICATOR : B.1.4.b Communication/dissemination of policy commitment(s) to business relationships

#### Indicator description:

The Company communicates its human rights policy commitment(s) to its business relationships. In addition, it reflects its human rights commitments within the terms of its contracts (or other equivalent, binding arrangements) with business relationships. (See also Indicator B.1.7).

#### ANSWER

Our Code of Ethics and Guide of Ethical Conduct address the relationship with our customers, partners, and suppliers. Our Social Responsibility Policy expresses the commitment to respect human rights, seeking to prevent and mitigate negative impacts on our direct activities, supply chain and partnerships.

Regarding our suppliers, our contracts include a clause that requires service providers to refrain from using child labor and slave-like labor or degrading labor conditions. In December 2018, we reviewed our EPC contract drafts to study the inclusion of a new social responsibility clause. This clause will be implemented during 2019.

According to the new clause, company providers must state and ensure that they respect internationally recognized human rights, as established in the International Bill of Human Rights, the International Labor Organization Declaration on Fundamental Principles and Rights at Work, the Guiding Principles on Business and Human Rights ("Guiding Principles") and the Decree No. 9571 of November 21, 2018, which establishes the Brazilian National Guidelines on Companies and Human Rights. Moreover, new clause, which is declaratory, states that company providers must:

Formal policy regarding the respect for Human Rights and disseminate to its stakeholders;

- Refrain from using child labor and slave labor or degrading labor conditions, as well as include a specific clause in this sense in agreements signed with suppliers of inputs and/or service providers;
- Safe and healthy work environment that includes adequate food, accomodation and sanitary conditions;



- Respect the right of its employees to form or join trade unions and to bargain collectively;
- Commit to equal treatment and non-discrimination;
- Do not practice or agree to any form of sexual exploitation of children and adolescents through employee awareness to fight this violence;
- Do not practice acts that create excessive force in the interaction between security forces, communities and workers;
- Communication channel to receive, forward and respond to manifestations of stakeholders, ensuring that all manifestations are answered and there are no retaliations;
- Assess the social risks of its activities in surrounding communities, identifying, preventing and mitigating adverse impacts on human rights issues (indigenous peoples and traditional communities, socially vulnerable groups, access to livelihoods and a healthy environment, right to integrity and safe environment, land management and resettlement);
- Communicate to surrounding communities the activities that impact their daily lives, in order to minimize impacts/risks;
- Make efforts to hire local labor;
- Repair any damages caused to communities.

# **EVIDENCES**

http://www.investidorpetrobras.com.br/en/corporate-governance/governanceinstruments/code-ethics

2018 Sustainability Report <u>http://www.petrobras.com.br/en/society-and-environment/integrated-report/\_pages</u> 39



# INDICATOR : B.1.5 Training on Human Rights

#### Indicator description:

The Company trains its workers on its human rights policy commitment(s).

#### ANSWER

All basic career training courses have specific topics on the human rights issues adressed in our Ethics Code. In 2016 and 2017 we promoted 144 basic career training for 1,350 participants. In 2016 and 2017, we promoted 47 specific courses (273 participants) related to topics such ethics, social responsibility, diversity and human rights. Moreover, in 2017, Petrobras provided the elearning course "ethics code and conduct guide" for all employees. The course had 44,893 participations, equivalent to 93% of the employees. Of this total, 6,796 were employees with management function (including the CEO and Executive Directors). The course also had the participation of 12,970 outsorced workers and 657 employees from others Petrobras subsidiaries working at Perobras Holding. In 2018 we promoted basic career training for 874 new employees including topics of "Human Rights". We also provide distance training addressing the Petrobras System's Code of Ethics and the Guide to Conduct, with the attendance of employees of subsidiaries. The online course had 2,940 employees trained and approved in 2018.

#### **EVIDENCES**

http://www.investidorpetrobras.com.br/en/corporate-governance/governanceinstruments/code-ethics

http://www.investidorpetrobras.com.br/en/annual-reports/integrated-report/sustainability

2017 Sustainability https://www.investidorpetrobras.com.br/enu/1011/Sustainability2017.pdf page 44 and 2018 Sustainability Report\_http://www.petrobras.com.br/en/society-and-environment/integrated-report/\_page 38

#### **INDICATOR : B.1.6 Monitoring and corrective actions**

#### Indicator description:

The Company monitors the implementation of its human rights policy commitment(s) across its operations and business relationships and follows up on corrective actions and necessary changes to policies or processes.

#### <u>ANSWER</u>

Our strategies and metrics defined in the Business and Management Plan (BMP) are broken down into individual goals and make up the scorecard of the company's areas. All leadership is involved, both in setting goals and in periodic follow-up. BMP monitoring is performed through the called Evolution Management System. Through corporate governance, we monitor the results on a monthly basis and define recovery actions if deviations are identified. In this way, the areas



become clear about their contribution to the achievement of our results, and managers are evaluated in a meritocratic way, according to their performance in meeting the goals defined for the organizational units under their management.

The Evolution Management System tracks four fronts of value generation to comply with our strategies: capital discipline, processes and costs efficiency, active portfolio management and revenue optimization. Security, cultural transformation, innovation and sustainability are the pillars that sustain actions on these four fronts.

Regarding our suppliers, we have a corporate register of suppliers, which has been constantly simplified and modernized, with the objective of previously evaluating our suppliers under technical, economic-financial, legal-fiscal, integrity and HSE (Health Safety and Environment) requirements. The evaluation criteria vary according to the importance of the items delivered and the type of supplier.

In 2018 we 2,984 companies in HSE requirements. Companies must present evidence and certifications related to compliance with safety, environmental and health standards, as well as to declare that they meet all requirements, laws and ordinances of this subject.

Among the criteria used to evaluate the candidates for suppliers, we introduced the TEC-SMS, which aims to identify the degree of implementation of the Environmental Management and Occupational Health and Safety Management Systems, according to ISO 14001 and ISO 45001 standards, even for suppliers that do not have these certifications.

To ensure proper application of rules for each type of service, the Risk Matrix and Scope Categorization is used, which establishes the degree of risk related to the following topics: Community Health and Safety, Employee Health and Safety, Environment (liquid spill,

gaseous emissions and solid waste), Legal Impact and Attention to Company Image. Environmental criteria were used in 76.05% of the new commitments formalized by Petrobras holding in 2018 and in all contracts where these criteria need to be observed

Our Code of Ethics requires suppliers and their employees to respect the ethical principles and the commitments of conduct defined in it, as long as their contracts withus remain in force. Based on this code and the standards for the supervision of contracts for goods and services, the contract manager will have the role of guaranteeing the compliance of the contractual clauses with respect to Health, Environment and Safety aspects, as well as Social Responsibility.

The relationship with suppliers during contractual execution is made through:

• supervision of the contract's execution;

• Supplier Performance Index (FDI), which assesses, among other items, the performance with respect to HSE practices;

• Report of Occurrences (RO) in service contracts, where the necessary nonconformities and improvements are notified.

In cases of noncompliance, the supplier may be asked to carry out a plan to correct the divergence noted. Current contracts may be up to a Commission for Analysis and

Application of Sanctions (CAASE). Throughout 2018, we conducted 130 sanctioning processes through CAASE, whose facts included fraud suspects, noncompliance with a contractual obligation, among other non-conformities practiced by suppliers. Still in 2018, 111 sanctions were applied to suppliers. During the hiring process, our suppliers declare that they acknowledge and agree with our Social Responsibility Policy.

In terms of negative impacts on labor practices, 14 companies were sanctioned in 2018 for occurrences considered to be of high severity. In terms of negative impacts on society, six companies were penalized in the year for reasons of suitability. For this reason, these 20 suppliers had their relationships terminated with us for a specified period.

Our Reporting Channel, under the management of the Ombudsman's Office, is prepared to receive complaints related to suppliers, such as those related to violations of the exercise of freedom of association and collective bargaining, among other issues of labor practices and human rights. The demands are investigated and depending on the results of the investigations, our procurement team is alerted to mitigate risks in new procurements. If there is noncompliance with contractual clauses, the contract manager adopts the appropriate measures.

# **EVIDENCES**

2018 Annual Report https://www.investidorpetrobras.com.br/enu/204/RA%202018\_english.pdf page 106 2018 Sustainability Report http://www.petrobras.com.br/en/society-andenvironment/integrated-report/\_pages 79-81

# INDICATOR : B.1.7 Engaging business relationships

#### Indicator description:

The Company takes human rights considerations into account when deciding to engage (or terminate) business relationships.

# <u>ANSWER</u>

Every supplier when submitting the proposals in our bidding process or before signing any contract with PETROBRAS must present a "Declaration of compliance with the Code of Ethics, Guide of Ethical Conduct and the Social Responsibility Policy of PETROBRAS". All those declarations are part of a clause at the Standard Contract of Service Agreement.

In December 2018, there was a review of the EPC contracts, construction and assembly of refining process units and Stationary Production Units (UEPs), and civil construction service agreements. Agreements signed as of 2019 will include a new social responsibility statement clause. According to the new clause, contractors must state and ensure that they respect internationally recognized human rights, as established in the International Bill of Human Rights, the International Labor Organization Declaration on Fundamental Principles and Rights at Work, the Guiding Principles on Business and Human Rights and the Decree No. 9571 of November 21, 2018, which establishes the Brazilian Guidelines on Business and Human Rights. Moreover, the contract clause, declaratory in nature, must include contractor's commitment to the following itens:

• Formal policy regarding the respect for Human Rights and disseminate to its stakeholders;

• Refrain from using child labor and slave labor or degrading labor conditions, as well as include a specific clause in this sense in agreements signed with suppliers of inputs and/or service providers;

 $\cdot$  Safe and healthy work environment that includes adequate food, accomodation and sanitary conditions;

• Respect the right of its employees to form or join trade unions and to bargain collectively;

• Commit to equal treatment and non-discrimination;

 $\cdot$  Do not practice or agree to any form of sexual exploitation of children and adolescents through employee awareness to fight this violence;

 $\cdot$  Do not practice acts that create excessive force in the interaction between security forces, communities and workers;

• Communication channel to receive, forward and respond to manifestations of stakeholders, ensuring that all manifestations are answered and there are no retaliations;

• Assess the social risks of its activities in surrounding communities, identifying, preventing and mitigating adverse impacts on human rights issues (indigenous peoples and traditional communities, socially vulnerable groups, access to livelihoods and a healthy environment, right to integrity and safe environment, land management and resettlement);

 $\cdot$  Communicate to surrounding communities the activities that impact their daily lives, in order to minimize impacts/risks;

• Make efforts to hire local labor;

• Repair any damages caused to communities.

#### **EVIDENCES**

2018 Sustainability Report http://www.petrobras.com.br/en/society-andenvironment/integrated-report/\_\_\_page\_ 39

#### INDICATOR: B.1.8 Approach to engagement with potentially affected stakeholders

#### Indicator description:

The Company has an approach to engaging with affected stakeholders on a regular basis. In doing so, it identifies affected and potentially affected stakeholders and engages in regular dialogue on human rights issues with them and organisations representing them. It also pays particular attention to those at heightened risk of vulnerability or marginalisation and prohibits bribes or other favours that may divide communities. To facilitate informed engagement, the Company provides meaningful information in accessible formats and languages.

#### <u>ANSWER</u>

Set by the Social Responsibility Policy, maintaining a long-term community relationship based on dialogue and transparency is one of our commitments. To achieve this, we seek to know the

dynamics of the communities that neighbor the places where we operate, their social players, and develop relationship plans, which the Company monitors and evaluates.

Our interaction with communities takes place in several ways: dialogue spaces, leadership visits to the Operational Units, lectures, training, emergency preparedness exercises, visits of our teams to communities, among others. We would like to highlight the spaces for voluntary dialogue, commonly called Community Committees. In these spaces, we address issues of common interest both to our activities and to the communities, such as: communication about the risks of operations and emergency preparedness exercises, communication of results of social and environmental projects, dissemination of national campaigns and other relevant issues raised by the participants.

The target audience of the community committees are the social actors present in the communities, such as formal and informal leaderships, public agencies, residents' association, traditional communities, civil society organization ,opinion formers. Some of these forums also include representatives of institutions or public agencies, such as Municipal Departments (health, education, environment, social welfare, among others), Civil Defense, Fire Department, cooperatives, educational institutions, nurseries and thelocal press.

The topics of discussions at the communities committees in 2018 were:

Safety in relation to our activities (training for emergency evacuation), maintenance stops; human rights (child and adolescent, women, the elderly), alcohol and other drugs, housing, environmental education, urban cleaning, domestic safety, child exploitation, business management, employment and income generation.

Health, recyclable waste, air quality, flare operation (noise, smoke and odor), HSE indicators, refinery contingency, tax collection, urban cleaning, sanitation, technical training, housing, public selection, general reports.

Use of local work force in companies whenever possible, local improvements, use of water and support demand from companies dealing with public authorities. We provide the toll free number 08007 289001, national coverage, and an electronic address to communicate with our different stakeholders. Through such channels, the community can indicate unusual situations in equipments, units and areas within the company, accidents and impacts, in addition to clarifying questions, request information, make complaints and register compliments. In 2018, 314 manifestations of the communities were registered, all treated locally.

#### EVIDENCES

2018 Sustainability Report http://www.petrobras.com.br/en/society-andenvironment/integrated-report/pages 74-76

# INDICATOR: B.2.1 Identifying: Processes and triggers for identifying human rights risks and impacts

### Indicator description:

The Company proactively assesses its human rights risks and impacts on an on-going basis, including when these are triggered by key moments of the Company's activities (e.g. policy change, market entry, new projects, amongst others).

# <u>ANSWER</u>

In our Corporate Standard of Social Risks' Management we consider the following dimensions for identification and risk analysis related to our operations and nearby communities: indigenous peoples and traditional communities, socially vulnerable groups, access to livelihoods and health environment, right to integrity and security, labor practice at the supply chain, infrastructure and public services, education and professional qualification, income generation and jobs opportunities, technological development and access to technology.

We prepared in 2018 new guidelines for managing social risks in our activities and in the supply chain, specifying the social responsibility requirements for investment projects. The investment projects - in order to be submitted to pass through gate transition - are evaluated by a multidisciplinary review group that includes specialists in Social Responsibility, Safety, Environment and Health, as well as business areas responsible for the projects, in addition to other areas. The recommendations for project gate transition consider the social context of communities and include actions to mitigate social risks, such as the promotion of human rights, among others. Were carried out 41 social risk assessments in projects along 2017-2018, of which 19 in 2018. Due to the profile of our activities, social issues identified are related to livelihoods of fishermen and traditional communities are identified, as well as potential impacts on tourism activity and access routes, the respect for human rights in the supply chain, among others. The analysis results in recommendations that include reviewing emergency response plans in the light of community relations, monitoring community claims and complaints, publicizing projects and operational activities, and including social responsibility clauses in contracts.

In the last two year, we enhanced our process of structuring and systematizing community relationship activities around our Operational Units. We carried out communities assessments considering the social context surrounding our operations. The criteria used to assess the communities are: impacts and risks of the Operational Unit to the community, daily interferences, proximity to pipeline ranges or other operational assets; Living conditions of communities, (access to public services:health, education, transportation, leisure areas); conflicts existence; social actors and presence of indigenous peoples and traditional communities. Those assessments are an important tool for managing community relationships insofar as it facilitates the systematization of our information about communities, our operations and their interrelationships. In all, 23 assessments were produced where information gathered served as inputs that were used in the respective community relationship plans. Thus we prepared 23 community relationship plans addressing the communities present in the scope of our operational units in the Brazilian territory.

In order to promote human rights in the supply chain, in December 2018, there was a review of the EPC contracts, construction and assembly of refining process units and Stationary Production Units (UEPs), and civil construction service agreements. Agreements signed as of 2019 will include a new social responsibility statement clause. According to the new clause, contractors must state and ensure that they respect internationally recognized human rights, as established in the International Bill of Human Rights, the International Labor Organization Declaration on Fundamental Principles and Rights at Work, the Guiding Principles on Business and Human Rights and the Decree No. 9571 of November 21, 2018, which establishes the Brazilian Guidelines on Business and Human Rights. Moreover, the contract clause, declaratory in nature, must include contractor's commitment to the following itens:

• Formal policy regarding the respect for Human Rights and disseminate to its stakeholders;

• Refrain from using child labor and slave labor or degrading labor conditions, as well as include a specific clause in this sense in agreements signed with suppliers of inputs and/or service providers;

 $\cdot$  Safe and healthy work environment that includes adequate food, accomodation and sanitary conditions;

• Respect the right of its employees to form or join trade unions and to bargain collectively;

• Commit to equal treatment and non-discrimination;

 $\cdot$  Do not practice or agree to any form of sexual exploitation of children and adolescents through employee awareness to fight this violence;

• Do not practice acts that create excessive force in the interaction between security forces, communities and workers;

• Communication channel to receive, forward and respond to manifestations of stakeholders, ensuring that all manifestations are answered and there are no retaliations;

• Assess the social risks of its activities in surrounding communities, identifying, preventing and mitigating adverse impacts on human rights issues (indigenous peoples and traditional communities, socially vulnerable groups, access to livelihoods and a healthy environment, right to integrity and safe environment, land management and resettlement);

 $\cdot$  Communicate to surrounding communities the activities that impact their daily lives, in order to minimize impacts/risks;

• Make efforts to hire local labor;

• Repair any damages caused to communities.

#### EVIDENCES

2018SustainabilityReporthttp://www.petrobras.com.br/en/society-and-environment/integrated-report/pages: 33-34, 39, 74-76



INDICATOR: B.2.2 Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)

### Indicator description:

Having identified its human rights risks and impacts, the Company assesses them and then prioritises its salient human rights risks and impacts.

#### **ANSWER**

In our Corporate Standard of Social Risks' Management we consider the following dimensions for identification and risk analysis related to our operations and nearby communities: indigenous peoples and traditional communities, socially vulnerable groups, access to livelihoods and health environment, right to integrity and security, labor practice at the supply chain, infrastructure and public services, education and professional qualification, income generation and jobs opportunities, technological development and access to technology.

We prepared in 2018 new guidelines for managing social risks in our activities and in the supply chain, specifying the social responsibility requirements for investment projects. The investment projects - in order to be submitted to pass through gate transition - are evaluated by a multidisciplinary review group that includes specialists in Social Responsibility, Safety, Environment and Health, as well as business areas responsible for the projects, in addition to other areas. The recommendations for project gate transition consider the social context of communities and include actions to mitigate social risks, such as the promotion of human rights, among others.

Were carried out 41 social risk assessments in projects along 2017-2018, of which 19 in 2018. Due to the profile of our activities, social issues identified are related to livelihoods of fishermen and traditional communities are identified, as well as potential impacts on tourism activity and access routes, the respect for human rights in the supply chain, among others.

The analysis results in recommendations that include reviewing emergency response plans in the light of community relations, monitoring community claims and complaints, publicizing projects and operational activities, and including social responsibility clauses in contracts.

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• Communicate to surrounding communities the activities that impact their daily lives, in order to minimize impacts/risks;

• Make efforts to hire local labor;

• Repair any damages caused to communities.

#### EVIDENCES

2018SustainabilityReporthttp://www.petrobras.com.br/en/society-and-environment/integrated-report/<br/>pages 33-34, 39, 74-76

# INDICATOR: B.2.3 Integrating and Acting: Integrating assessment findings internally and taking appropriate action

### Indicator description:

The Company integrates the findings of its assessments of human rights risks and impacts into relevant internal functions and processes by taking appropriate actions to prevent, mitigate or remediate its salient human rights issues.

# ANSWER

In our Corporate Standard of Social Risks' Management we consider the following dimensions for identification and risk analysis related to our operations and nearby communities: indigenous peoples and traditional communities, socially vulnerable groups, access to livelihoods and health environment, right to integrity and security, labor practice at the supply chain, infrastructure and public services, education and professional qualification, income generation and jobs opportunities, technological development and access to technology

We prepared in 2018 new guidelines for managing social risks in our activities and in the supply chain, specifying the social responsibility requirements for investment projects. The investment projects - in order to be submitted to pass through gate transition - are evaluated by a multidisciplinary review group that includes specialists in Social Responsibility, Safety, Environment and Health, as well as business areas responsible for the projects, in addition to other areas. The recommendations for project gate transition consider the social context of communities and include actions to mitigate social risks, such as the promotion of human rights, among others.

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The analysis results in recommendations that include reviewing emergency response plans in the light of community relations, monitoring community claims and complaints, publicizing projects and operational activities, and including social responsibility clauses in contracts.

In the last two year, we enhanced our process of structuring and systematizing community relationship activities around our Operational Units. We carried out communities assessments considering the social context surrounding our operations. The criteria used to assess the communities are: impacts and risks of the Operational Unit to the community, daily interferences, proximity to pipeline ranges or other operational assets; Living conditions of communities, (access to public services:health, education, transportation, leisure areas); conflicts existence; social actors and presence of indigenous peoples and traditional communities.

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• Assess the social risks of its activities in surrounding communities, identifying, preventing and mitigating adverse impacts on human rights issues (indigenous peoples and traditional communities, socially vulnerable groups, access to livelihoods and a healthy environment, right to integrity and safe environment, land management and resettlement);

• Communicate to surrounding communities the activities that impact their daily lives, in order to minimize impacts/risks;

• Make efforts to hire local labor;

• Repair any damages caused to communities.

## EVIDENCES

2018SustainabilityReporthttp://www.petrobras.com.br/en/society-and-environment/integrated-report/Pages 33-34, 39, 74-76

INDICATOR : B.2.4 Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts

## Indicator description:

The Company tracks and evaluates the effectiveness of actions taken in response to its human rights risks and impacts and describes how it uses that information to improve processes and systems on an ongoing basis.

## ANSWER

In our Corporate Standard of Social Risks' Management we consider the following dimensions for identification and risk analysis related to our operations and nearby communities: indigenous peoples and traditional communities, socially vulnerable groups, access to livelihoods and health environment, right to integrity and security, labor practice at the supply chain, infrastructure and public services, education and professional qualification, income generation and jobs opportunities, technological development and access to technology.

We prepared in 2018 new guidelines for managing social risks in our activities and in the supply chain, specifying the social responsibility requirements for investment projects. The investment projects - in order to be submitted to pass through gate transition - are evaluated by a multidisciplinary review group that includes specialists in Social Responsibility, Safety, Environment and Health, as well as business areas responsible for the projects, in addition to other areas. The recommendations for project gate transition consider the social context of communities and include actions to mitigate social risks, such as the promotion of human rights, among others. Were carried out 41 social risk assessments in projects along 2017-2018, of which 19 in 2018. Due to the profile of our activities, social issues identified are related to livelihoods of fishermen and traditional communities are identified, as well as potential impacts on tourism activity and access routes, the respect for human rights in the supply chain, among others. The analysis results in recommendations that include reviewing emergency response plans in the light of community relations, monitoring community claims and complaints, publicizing projects and operational activities, and including social responsibility clauses in contracts.

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 $\cdot$  Do not practice acts that create excessive force in the interaction between security forces, communities and workers;

• Communication channel to receive, forward and respond to manifestations of stakeholders, ensuring that all manifestations are answered and there are no retaliations;

• Assess the social risks of its activities in surrounding communities, identifying, preventing and mitigating adverse impacts on human rights issues (indigenous peoples and traditional communities, socially vulnerable groups, access to livelihoods and a healthy environment, right to integrity and safe environment, land management and resettlement);

• Communicate to surrounding communities the activities that impact their daily lives, in order to minimize impacts/risks;

• Make efforts to hire local labor;

• Repair any damages caused to communities.

## **EVIDENCES**

2018SustainabilityReporthttp://www.petrobras.com.br/en/society-and-environment/integrated-report/\_\_pages33-34, 39, 74-76



## INDICATOR : B.2.5 Communicating: Accounting for how human rights impacts are addressed

#### Indicator description:

The Company communicates externally how it addresses its human rights impacts in a manner that is accessible to its intended audiences, especially affected stakeholders who have raised concerns, providing enough information to evaluate the adequacy of the response(s) and does not pose risks to affected stakeholders or personnel. This communication is distinct from engagement with potentially affected stakeholders for the purposes of assessing or addressing impacts (See also Indicators B.1.8, B.2.1 and B.2.2).

## ANSWER

We report on Human Rights in our sustainability report following GRI Standards requirements assured by third part (KPMG). We correlate UN Global Compact Principles to GRI indicators since 2004. Since 2016 we also started to correlate SDGs to GRI indicators.

Moreover, we implement community consultations through public hearings conducted by the licensing authority, forums for information about the project, its social and environmental impacts and discussion of Environmental Studies, in order to brief interested parties about <u>the</u> project content, clarifying questions and hearing criticisms and suggestions about. This process integrates the environmental licensing, administrative procedure whereby the competent environmental agency licenses the location, installation, expansion, modification and operation of projects and activities. In addition to the public hearing and environmental licensing, we consider community relationship as a long-term process that has as one of its objectives to develop interaction and continuous relationship with the communities in the surrounding areas, maintaining permanent channels of dialogue, aiming to understand the roles and attributions of the different social actors, sharing responsibilities, generating mutual trust and aligning expectations of all parties.

Our interaction with communities takes place in several ways: dialogue spaces, leadership visits to the Operational Units, lectures, training, emergency preparedness exercises, visits of our teams to communities, among others. We would like to highlight the spaces for voluntary dialogue, commonly called Community Committees. In these spaces, we address issues of common interest both to our activities and to the communities, such as: communication about the risks of operations and emergency preparedness exercises, communication of results of social and environmental projects, dissemination of national campaigns and other relevant issues raised by the participants.

The target audience of the community committees are the social actors present in the communities, such as formal and informal leaderships, public agencies, residents'association, traditional communities, civil society organization ,opinion formers. Some of these forums also include representatives of institutions or public agencies, such as Municipal Departments (health, education, environment, social welfare, among others), Civil Defense, Fire Department,

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cooperatives, educational institutions, nurseries and thelocal press.e) presence of traditional communities and population

# **EVIDENCES**

2018 Sustainability Report http://www.petrobras.com.br/en/society-andenvironment/integrated-report/ pages 74-75

INDICATOR : C.1 Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers

## Indicator description:

The Company has one or more channel(s)/mechanism(s) (its own, third party or shared) through which workers can raise complaints or concerns, including in relation to human rights issues. The channel(s)/mechanism(s) is available to all workers and takes into account accessibility by marginalised groups. The channel(s)/mechanism(s) is not used to undermine the role of legitimate trade unions in addressing labour-related disputes, nor to preclude access to judicial or other non-judicial grievance mechanisms.

## **ANSWER**

Through the General Ombudsman's Office, Petrobras acts in information requests that arrive via the Citizen Information Service, thus complying with the LAI (Brazilian Act n. 12,527 of 2011, also known as Public Access to Information Act), and also operates in denunciations, complaints, requests, praises and suggestions, as well as issues under Law No. 12,813 / 2013 (Conflict of Interest Law). The company evaluates situations of potential conflict between public and private interests that may jeopardize the collective interest or improperly influence the performance of the public function.

We also make available to our public other means of contact, such as telephone, electronic forms, face-to-face service and the Reporting Channel, for manifestation of denunciations, respecting the confidentiality of the source whenever necessary. Our Reporting Channel is managed by an independent and specialized company. Available 24/7 in three languages (Portuguese, English and Spanish) and in all countries where we operate, the channel centralizes the collection of complaints, including those related to discrimination, harassment and human rights violations.

In 2018, our Reporting Channel received a total of 2,396 complaints, including both holding company and subsidiaries. Of these, 878 referred to human rights issues.

## EVIDENCES

2018SustainabilityReporthttp://www.petrobras.com.br/en/society-and-environment/integrated-report/\_pages 46-48



# INDICATOR : C.2 Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities

## Indicator description:

The Company has one or more channel(s)/mechanism(s) (its own, third party or shared) through which individuals and communities who may be adversely impacted by the Company can raise complaints or concerns, including in relation to human rights issues.

## <u>ANSWER</u>

Through the General Ombudsman's Office, Petrobras acts in information requests that arrive via the Citizen Information Service, thus complying with the LAI (Brazilian Act n. 12,527 of 2011, also known as Public Access to Information Act), and also operates in denunciations, complaints, requests, praises and suggestions, as well as issues under Law No. 12,813 / 2013 (Conflict of Interest Law). The company evaluates situations of potential conflict between public and private interests that may jeopardize the collective interest or improperly influence the performance of the public function.

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We emphasize that Petrobras' Reporting Channel is available to all stakeholders, internal or external, including to communities where our business partners in the extractive sector operate, via phone form or by call free of charge telephone.

## **EVIDENCES:**

https://www.contatoseguro.com.br/en/petrobras

2018SustainabilityReporthttp://www.petrobras.com.br/en/society-and-environment/integrated-report/pages46-48



# INDICATOR: C.3 Users are involved in the design and performance of the channel(s)/mechanism(s)

## Indicator description:

The Company (or the initiative, in the case of a shared channel/mechanism) engages with potential or actual users on the design, implementation and performance of the channel(s)/mechanism(s).

## <u>ANSWER</u>

Users of the denouncement channel managing software located at General Ombudsman's Office, Compliance and Internal Audit areas, often submit requests for new or modified functionalities, in order to comply with regulatory issues or internal needs, such as customized user profiles and reports. These requests are discussed with Ombudsman's Office management and the approved ones are forwarded to the company responsible for the channel for implementation.

## **EVIDENCES:**

2018SustainabilityReporthttp://www.petrobras.com.br/en/society-and-environment/integrated-report/\_pages 46-48



INDICATOR: C.4 Procedures related to the mechanism(s)/channel(s) are publicly available and explained

## Indicator description:

The Company describes how complaints or concerns are received, processed and addressed and how those making complaints are informed throughout the process as well as how these may be escalated.

## **ANSWER**

1) PETROBRAS DENOUNCEMENT CHANNEL (EXCLUSIVE FOR RECEIVING DENOUNCEMENTS)

The denouncement channel is a way to augment our commitment to transparency and ethics.

This independent and impartial tool is available to external and internal audiences of Petrobras and its controlled companies. Denouncements can be registered on the following topics:

- Fraud
- Corruption
- Money Laundering
- •Harassment
- Discrimination
- Safety, Environment and Health
- Other irregularities (including human rights violations)

What is considered an irregularity? Actions or omissions that are against the law or against the Code of Ethics of the Petrobras Group and the Code of Conduct that may cause losses to Petrobras and its controlled companies, its employees, collaborators, shareholders and other stakeholders. In case your denouncement is not related to the cases aforementioned, and you want to make a complaint, request for information, give an opinion or suggestion, consult or make a compliment, please go to Petrobras General Ombudsman Office website.

How to make your denouncement

Your denouncement can be made:

Via Internet

Accessing the form to make your denouncement. Your computer's IP won't be identified in any circumstance.

# By telephone

Call toll free at 0800 601 6925.

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The channel is available 24 hours a day, seven days a week. The calls are answered by specialists trained to obtain the maximum information about the denouncement, without compromising the anonymity and safety of the source. The telephone number that originated the call will not be identified in any circumstance.

All information will be received by Contato Seguro, an external and independent company, specialized in receiving denouncements.

After registering the denouncement, Contato Seguro will forward, with assurance of anonymity, the information to the Petrobras General Ombudsman Office which will analyze and determine the area responsible for conducting the investigation.

During the investigation process the demander is periodically updated on the progress of the denouncement and, upon conclusion, receives a response which indicates whether or not there was any substance in his demand.

OTHERS CHANNELS OF THE GENERAL OMBUDSMAN OFFICE (RECEIVING REQUESTS FOR INFORMATION, COMPLAINTS, REQUESTS, COMPLIMENTS OR SUGGESTIONS)

Petrobras General Ombudsman Office is responsible for receiving requests for information, inquiries, conflicts of interest, denunciations, complaints, requests, suggestions and compliments from all our audiences. It is directly linked to the Board of Directors, to which it is accountable for its activities. On a quarterly basis, the Ombudsman General's Office makes a presentation to the Executive Board and to the Board of Directors. The General Ombudsman is appointed by our Board of Directors for a term of three years, which allows a single reappointment for the same period.

The performance of our Ombudsman's Office is based on principles of independence, confidentiality and concern for the accessibility of all public, observing the ethical principles and commitments of Petrobras System Conduct Guide. Our Ombudsman's Office is the one who forwards the complaints for investigation in the areas, which decide on the solution of the complaint. It also contributes to the improvement of internal standards, although it is beyond its reach, modifying them.

As of Law no. 12,527 / 2011 (Law on Access to Information - LAI), in May 2012, the Ombudsman-General acts as the authority responsible for implementing and monitoring this law within Petrobras. Our Ombudsman's Office also has, as one of its attributions, the treatment of queries regarding the Conflict of Interest Law (Law No. 12.813 / 2013).

# EVIDENCES:

http://www.petrobras.com.br/en/ombudsman/

2018SustainabilityReporthttp://www.petrobras.com.br/en/society-and-environment/integrated-report/\_pages46-48



## INDICATOR: C.5 Commitment to non-retaliation over complaints or concerns made

#### Indicator description:

The Company describes how complaints or concerns are received, processed and addressed and how those making complaints are informed throughout the process as well as how these may be escalated.

#### **ANSWER**

Petrobras' commitment to the prevention of retaliation practices is recorded in internal regulations, such as the Employees Disciplinary Regime and Consequences System of the Senior Management and Fiscal Council, the Code of Ethics and the Petrobras System Guide of Conduct, among others. Our Code of Ethics states: "Ombudsman agencies or instances eventually responsible for processing complaints of ethics transgressions will preserve the anonymity of the complainant, in order to avoid retaliation against them and it will notice them of the measures taken".

We affirm in our Conduct Guide that "The Petrobras System has an absolute guarantee of confidentiality and accepts a communication or report of misconduct or of an indication of misconduct made in good faith, and shall not allow retaliation or punishment against any persons making such disclosure or complaint".

Our contracts include a clause that states that company providers must have a communication channel to receive, forward and respond to manifestations of stakeholders, ensuring that all manifestations are answered and there are no retaliations. In addition, the option of preserving the anonymity present in the Denunciation Channel is an element that contributes significantly to the guarantee of non-retaliation to the denouncer, when exercised by the denouncer.

In this line, we publish for our internal public the Ombudsman's Manual of Transparency, which mentions "the policies that guide the ombudsman function that one of the structuring pillars of the activity is to assure those who demand the organ the confidentiality of their report. If this were not the case, there would be a weakening of the credibility of their channels, inasmuch as they would no longer be able to offer minimum conditions for reception free of demonstrations. It is a principle intended to prevent the leakage of personal information, retaliation and / or constraints to those who seek the Ombudsman's Office."

Finally, it is worth noting that the Ombudsman General receives complaints of retaliation, which are sent to the areas of investigation, whenever they contain minimal elements of materiality and / or authorship.

## **EVIDENCES:**

https://www.investidorpetrobras.com.br/enu/144/Sustainability\_2018\_10\_06.pdf

https://www.investidorpetrobras.com.br/enu/8884/CodigodeEtica2019Ingles.pdf

https://www.investidorpetrobras.com.br/enu/11/PetrobrasSystemsConductGuide2017.pdf



INDICATOR: C.6 Company involvement with State-based judicial and non-judicial grievance mechanisms

## <u>ANSWER</u>

Through the General Ombudsman's Office, Petrobras acts in information requests that arrive via the Citizen Information Service, thus complying with the LAI (Brazilian Act n. 12,527 of 2011, also known as Public Access to Information Act), and also operates in denunciations, complaints, requests, praises and suggestions, as well as issues under Law No. 12,813 / 2013 (Conflict of Interest Law).

We emphasize that Petrobras' Reporting Channel is available to all stakeholders, internal or external, including to communities where our business partners in the extractive sector operate, via phone form or by call free of charge telephone.

## INDICATOR: C.7 Remedying adverse impacts and incorporating lessons learned

## Indicator description:

The Company provides for or cooperates in remediation to victims where it has identified that it has caused or contributed to adverse human rights impacts (or others have brought such information to the company's attention, such as through its grievance channel(s)/mechanism(s).

## <u>ANSWER</u>

Code of Ethics / Petrobras System's Conduct Commitments

5 - In its relations with customers and consumers, the Petrobras System commits itself to:

5.2 - repair possible losses or damages resulting from damages caused under its responsibility to its consumers and clients, with the maximum agility, within feasible deadlines.

6 - In its relation to the environment, and as a demonstration of its responsibility towards current and future generations, the Petrobras System commits itself to:

6.6 - invest in the sustainability of its projects, products and services, maximizing its economic, social and environmental benefits, minimizing adverse impacts and monitoring the entire life cycle of its facilities, operations and products;

7 - In its relations with the communities, the Petrobras System commits to:

7.1 maintain permanent channels of communication and dialogue with the communities where it operates, with the aim of preventing, monitoring, evaluating and controlling the impacts of its activities;

7.5 repair possible losses or damages resulting from damage caused to the affected persons or communities under their responsibility, with maximum agility.

## EVIDENCES:

https://www.investidorpetrobras.com.br/enu/8884/CodigodeEtica2019Ingles.pdf



## INDICATOR: D.3.1 Living wage (in own extractive operations, which includes JVs)

#### Indicator description:

The Company pays all its workers a living wage, which is regularly reviewed and negotiated through collective bargaining with relevant trade unions where they are operating. There are numerous definitions of living wage but the core concept is to provide a decent standard of living for a worker and his or her family based on a regular work week not including overtime hours. A living wage is sufficient to cover food, water , clothing, transport, education, health care and other essential needs for workers and their entitled official dependents and provide some discretionary income. Workers also receive equal pay for equal work.

#### **ANSWER**

The Careers and Compensation Plan (PCR) and the Classification and Evaluation Plan (PCAC) establishes the structure of positions and careers of Petrobras, with their respective descriptions, requirements, evaluation and salary ranges. In line with the company's objectives, the job plan is the instrument that sustains the planning and management of the company's staff, supports the policies of attraction and retention of employees, recognition and reward processes, functional evolution and professional development.

The salary ranges take into account the microregion (1) where the city where the employee will perform his functions, and the respective cost of living, to compose a Minimum Remuneration by Level and Region (RMNR), providing a living wage.

The Company's positions were ranked based on the score resulting from the job evaluation process, conducted by specialized consulting on the subject, and correlated with the result of the compensation survey.

Regarding direct remuneration, market surveys conducted annually, such as those developed by Willis Towers Watson, show that the company's wages are in line with best practices in the Oil and Gas market. In the latest survey, in 2017, the monthly average practiced by Petrobras was compatible with the third quarter of the market. In addition to the direct remuneration, Petrobras offers several benefits to its employees, for example, Meal / Food Voucher, Educational Aid (1), Health Insurance(2) and Complementary Pension Plan.

The salary amounts are paid monthly and without any distinction. They are also reviewed and corrected annually through negotiation with trade unions representative of the professional category, with a view to resolving eventual lags arising from inflation in the country.

Thus, the compensation package offered by the Company has been very competitive over the years. Evidence of this is their low turn over and the large number of candidates enrolled in our Public Selection Process (3).

(1) In the respective groups, the cities that make up the geographic microregion are considered, according to the concept used by the Brazilian Institute of Geography and Statistics (IBGE).

(2) http://www.petrobras.com.br/en/about-us/careers/labor-practices/

(3) <u>http://www.petrobras.com.br/pt/quem-somos/carreiras/concursos/</u>

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INDICATOR: D.3.2 Transparency and accountability (in own extractive operations, which includes JVs)

# Indicator description:

The Company understands the importance of more openness around how countries and businesses manage natural resource wealth to ensure that these resources can benefit all citizens and demonstrates this by participating in initiatives on transparency, in particular on revenue transparency or disclosing payments and contracts.

## <u>ANSWER</u>

Petrobras discloses the amounts of taxes and government contributions on oil and gas exploration and production activities paid to the Brazilian Government and to the other governments where it has have extractive operations.

## **EVIDENCES**

http://www.investidorpetrobras.com.br/en/operational-highlights/tributes-and-royalties

https://www.investidorpetrobras.com.br/en/overview/tributes-and-government-participation

INDICATOR: D.3.3 Freedom of association and collective bargaining (in own extractive operations, which includes JVs)

# Indicator description:

The Company respects the right of all workers to form and join a trade union of their choice and to bargain collectively. In addition, it provides workers' representatives with appropriate facilities to assist in the development of effective collective bargaining agreement(s). The Company also prohibits intimidation, harassment, retaliation and violence against trade union members and trade union representatives.

## <u>ANSWER</u>

We commit in our Code of Ethics:

2 - Regarding relation with its Employees, Petrobras System undertakes to (page 5):

2.5 - acknowledge the right of free association of its employees, respecting and valuing their participation in unions and not doing any kind of negative discrimination against unionized employees;

2.6 - pursuit permanent reconciliation of interests and realization of rights, through institutional channels of negotiation, in its relationship with the unions representing the employees;

4 - Regarding relation with Suppliers, Service Providers and Trainees, Petrobras System undertakes to (page 6):

4.2 - require to the service providers that their employees comply with the ethics principles and commitments defined in this Code, while contracts with System companies are in force (page 25).

Our Code of Ethics also states (page 9):

I. This Ethics Code covers the members of Boards of Directors, Fiscal Councils, Executive Boards, the occupants of managerial functions, employees, trainees and service providers of Petrobras system, as individual and collective commitment of each and all of them to comply with it and promote its compliance in all actions of the productive chain of Petrobras System and in its relations with all interested parties.

III. The violation of the principles and commitments expressed in this Code may result in the adoption of disciplinary measures, in accordance with the standards of the companies comprising Petrobras System.

IV. Petrobras System will submit this Ethics Code to periodic reviews, under the oversight of Petrobras' Ethics Committee, with transparency and interested parties participation.

V. Ombudsman agencies or instances eventually responsible for processing complaints of ethics transgressions will preserve the anonymity of the complainant, in order to avoid retaliation against them and it will notice them of the measures taken.

We value transparency in our relationships with all our stakeholders, including trade unions. We maintain relationships with seventeen trade unions and one federation of Oil Tankers, as well as with eight unions and one federation of Maritime Workers. Of our employees, 45% are unionized and all of our employees are covered by collective bargaining agreements. These contracts consist of social clauses (which relate to work, safety conditions, benefits, among other matters), which are valid for two years under the current collective bargaining agreement.

In September 2018, we implemented the automatic 4.19% salary and benefits readjustment agreed on the 2017-2019 CBA of the oil workers. In addition, in 2018 we paid out employee profit-sharing. During this year, there have been no strikes or protests that affect production. By may 2019 we have started the negotiations of the economic and social clauses of the collective bargaining agreement with the oil workers unions.

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Our contracts include a clause that requires service providers to refrain from using child labor and slave-like labor or degrading labor conditions. Moreover, new clause, which is declaratory, states that company providers must "Respect the right of its employees to form or join trade unions, as well as to bargain collectively".

We emphasize that Petrobras' Reporting Channel is available to all stakeholders, internal or external. If there is noncompliance with the Code of Ethics, everyone can denounce to the Ombudsman Office.

## **EVIDENCES**

http://www.investidorpetrobras.com.br/en/corporate-governance/governanceinstruments/code-ethics

https://www.investidorpetrobras.com.br/en/results-and-notices/annual-reports

http://www.petrobras.com.br/en/about-us/profile/compliance-ethics-and-transparency/ (Petrobras System Code of Ethics) FORM 20F 2018, page 114

https://www.investidorpetrobras.com.br/enu/892/Form-20F-2018-Ingles\_2.pdf

2018 Sustainability Report <a href="http://www.petrobras.com.br/en/society-and-environment/integrated-report/">http://www.petrobras.com.br/en/society-and-environment/integrated-report/</a>



INDICATOR: D.3.4 Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)

## Indicator description:

The Company discloses a set of quantitative information on health and safety related to its direct employees, its workers and on site contractors namely: injury rate, fatality rate, lost days or near miss frequency rate.

## **ANSWER**

Annually, in the sustainability report, we report on the evolution of our health and safety indicators in line with the GRI indicators, such as lost days, injury rates, fatalities and occupational disease incidence rates in addition to the main actions of the Commitment to Life Program, which aims to strengthen safety guidelines at all stages of our processes, aiming at the elimination of critical deviations and thus preventing the occurrence of accidents.

In the sustainability report for the year 2018 the Health and Safety initiatives and indicators can be found on pages 3 (CEO message), 5(Highlights) and 18 to 22 (Health and Safety/Life Commitment). For 2019 we have two indicators target:

Recordable Accident Rate (RAR): 1,01 in 2018; 0,99 for 2019

Lost Labor Time (LLT) (%): 2.13 in 2018; 2.00 for 2019.

## **EVIDENCES**

 2018
 Sustainability
 Report
 http://www.petrobras.com.br/en/society-and 

 environment/integrated-report/
 pages 3, 5 18-22

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# INDICATOR: D.3.5 Indigenous peoples rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)

## Indicator description:

The Company respects indigenous peoples' rights in its processes to decide whether and how to carry out projects (or changes to existing projects) that are located in or impact on lands or territories or resources traditionally owned or occupied or traditionally or customarily used by indigenous peoples (legitimate tenure rights holders as set out in the UN Voluntary Guidelines) or on their cultural heritage. These processes assess and address impacts of the Company's activities and those of their business relationships and any related actions of the government.

## ANSWER

We carry out diagnoses and analysis of the community relationship in order to assess the characteristics and needs of the communities surrounding our Operating Units. From this process, which had a new cycle completed in 2018, we identified traditional peoples and communities, particularly fishermen and quilombolas, as well as riverine, caiçaras and indigenous peoples.

Among the criteria used to classify the communities we can mention:

a) impacts and risks of the Operational Unit (OU) to the community, such as proximity to the isorisk curve, daily interferences, proximity to pipeline ranges or other operational assets, among other factors;

b) living conditions of communities, including access to public services (health, education, transportation, leisure areas);

c) existence of conflicts;

d) social actors; and

e) presence of traditional communities and population.

The methodology establishes different levels of engagement for each community and, based on these references, initiatives are established that integrate the Community Relationship Plan of each operational unit.

The relationship plans already include specific actions for these communities, as well as other surrounding communities, in order to direct our actions towards their involvement and development.

Indigenous communities exist in municipalities within the area covered by the licensed projects of the Santos Basin Operational Unit, in the municipalities of the north coast of São Paulo and in the south coast of the state of Rio de Janeiro. Although there is no specific forum for indigenous communities, these communities are invited to attend public hearings related our projects in the region.



In addition, we participate in projects managed by Brazilian Institute of Environment and Renewable Natural Resources (IBAMA) with a focus on traditional communities, such as the Traditional Territory Characterization Project (PCTT), whose objective is to participate in the characterization of indigenous communities, quilombolas and caiçaras of the municipalities of Paraty (RJ), Angra dos Reis (RJ) and Ubatuba (SP).

Among the voluntary social environmental projects with focus on traditional communities, we highlight the Memories Revealed project, whose partnership established in 2014, aiming at strengthening the identity bonds of children and adolescents through contact with the memory of their caiçara ancestors. 800 indirect and 190 direct participants (students and teachers of the public network, in addition to their relatives) are expected to attend, providing awareness for the rescue of the caiçara culture.

In 2018, we had no significant conflicts with local communities and indigenous peoples and no involuntary resettlement as a result of our operations.

In December 2018, we reviewed our EPC contract drafts to study the inclusion of a new social responsibility clause. This clause will be implemented during 2019.

According to the new clause, company providers must state and ensure that they respect internationally recognized human rights, as established in the International Bill of Human Rights, the International Labor Organization Declaration on Fundamental Principles and Rights at Work, the Guiding Principles on Business and Human Rights ("Guiding Principles") and the Decree No. 9571 of November 21, 2018, which establishes the Brazilian National Guidelines on Companies and Human Rights.

Moreover, new clause, which is declaratory, states that company providers must: "Assess the social risks of its activities in surrounding communities, developing actions to identify, prevent and mitigate adverse impacts on human rights issues (interference in indigenous peoples and traditional communities, in socially vulnerable groups, access to livelihoods and a healthy environment, right to integrity and safe environment, land management and resettlement, among others)."

## **EVIDENCES:**

2018 Sustainability Report <u>http://www.petrobras.com.br/en/society-and-</u> environment/integrated-report/ pages 41, 74-76



## INDICATOR: D.3.6 Land rights (in own extractive operations, which includes JVs)

#### Indicator description:

When acquiring, leasing or making other arrangements to use (or restrict the use of) land, the Company recognises legitimate tenure rights with particular attention to vulnerable tenure rights holders.

#### **ANSWER**

In December 2018, we reviewed our EPC contract drafts to study the inclusion of a new social responsibility clause. This clause will be implemented during 2019.

According to the new clause, company providers must state and ensure that they respect internationally recognized human rights, as established in the International Bill of Human Rights, the International Labor Organization Declaration on Fundamental Principles and Rights at Work, the Guiding Principles on Business and Human Rights ("Guiding Principles") and the Decree No. 9571 of November 21, 2018, which establishes the Brazilian National Guidelines on Companies and Human Rights.

Moreover, new clause, which is declaratory, states that company providers must: "Assess the social risks of its activities in surrounding communities, developing actions to identify, prevent and mitigate adverse impacts on human rights issues (interference in indigenous peoples and traditional communities, in socially vulnerable groups, access to livelihoods and a healthy environment, right to integrity and safe environment, land management and resettlement, among others)."

## **EVIDENCES:**

2018	Sustainability	Report	http://www.petrobras.com.br/en/society-and-
environment/integrated-report/_page 39			



## INDICATOR: D.3.7 Security (in own extractive operations, which includes JVs)

#### Indicator description:

The Company maintains the safety and security of operations within an operating framework that ensures respect for human rights and international humanitarian law, and acts in a manner consistent with applicable international standards, particularly with regard to the use of force.

#### **ANSWER**

Our security activities are performed observing national and international legislation regarding individual and collective rights, good practices and recommendations for respecting human rights.

The Protective Intelligence and Corporate Security Policy establishes principles and guidelines for the planning, orientation, execution and improvements of the actions of protective intelligence and corporate security worldwide.

The principles are the commitment to protecting people and to preventive action, always in accordance with legal requirements, recommendations and standards. In compliance with national legislation, the operation of security professionals (employees and contractors) is limited to the internal environment of our facilities.

We have a Risk Management Policy that has as one of its principles that life must be respected. Our standard of Social Risks Management considers the right to integrity and security as a theme of the human rights dimension at the process of social risk identification. A multidisciplinary team (Social Responsibility, Intelligence and Corporate Security, Communication and HSE areas) carries out the diagnosis and analysis of community relationship. The objective is to obtain comprehensive information about communities by identifying the social context, local actors in order to draft recommendations for community relationship.

We carry out Security Risk Assessments for the implementation of new projects and major constructions with the following steps: Security Risk Management Planning; Business Security Study; Identify, analyze and evaluate the risks; Treatment planning; Treat risks; Communicate; Critical analysis. For these evaluations, we maintain a system for recording, investigating and managing security incidents (RIOWEB).

Petrobras Corporate Intelligence and Security area engages with public security agencies, for preventive actions with public security at the federal, state and municipal levels establishing communication and cooperation channels. We participate in Community Security Councils of the regions where we operate, approaching police organizations and civil society, contributing to build a mutual respect relationship and identify local problems. We are establishing cooperative agreements with the public security sector, in order to fulfill needs and structural deficiencies in infrastructure and personnel training. The agreements establish limits of action and provide controls and accountability for the application of resources.

We are developing an agreement and partnership with the Public Prosecution, so it can act as inspector of law and of the various public security institutions, providing it liberty in investigations related to deviations and violations of individual and collective rights.

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In Brazil, the training and skills of internal staff and service providers that act as property security is carried out according to government control. The law requires that professionals to be trained to act within respect of human rights.

Personnel are not allowed to carry out their property security activities without the proper professional certification and license by the Federal Police Department.

Meetings are held monthly with private security providers to evaluate the service and analyze detected deviations and good practices. They are monitored to ensure they fulfill their obligations consistently with the rules of conduct outlined by our company.

The operational procedures of property security and the management of controlled equipment are regulated by internal standards, also applying to private providers.

The contracts of private security services establish the supervision of activities in order to guarantee compliance within the parameters defined, including internal regulations and legal requirements.

Routine behavioral inspections and audits are carried out to ensure that property security personal act in a safe manner, with adequate equipment and with the purpose of reducing incidents. The origin of the equipment and its transport are controlled by internal and external systems, with frequent audits and inspections.

We maintain an independent, confidential and impartial Denouncement Channel to increase our commitment to transparency and ethics. An independent company is responsible to receive grievances and complaints that are monitored and investigated.

Petrobras has an internal audit process that covers our contracts and service providers.

In December 2018, we reviewed our EPC contratc drafts to study the inclusion of a new social responsibility clause. This clause will be implemented during 2019.

According to the new clause, company providers must state and ensure that they respect internationally recognized human rights, as established in the International Bill of Human Rights, the International Labor Organization Declaration on Fundamental Principles and Rights at Work, the Guiding Principles on Business and Human Rights ("Guiding Principles") and the Decree No. 9571 of November 21, 2018, which establishes the Brazilian National Guidelines on Companies and Human Rights.

Moreover, new clause, which is declaratory, states that company providers must: "Not practice acts that create excessive force in the interaction between security forces, communities and workers."

## EVIDENCES

Petrobras Denouncement Channel

https://www.contatoseguro.com.br/en/petrobras

2018 Sustainability Report http://www.petrobras.com.br/en/society-and-environment/integratedreport/



## INDICATOR: D.3.8 Water and sanitation (in own extractive operations, which includes JVs)

## Indicator description:

The Company does not negatively affect access to safe water, in line with the UN Sustainable Development Goals and the UN Global Compact's CEO Water Mandate.

## ANSWER

For the Company workers, all of our facilities provide access to clean water for drinking and cleaning purposes, hygiene, adequate sanitation and solid waste management. Our Technical Standard N-2920 defines the required conditions related to providing access to potable water intended for human consumption (drinking, hygiene and sanitation), as well as its quality control requirements and monitoring routines. This Technical Standard is heavily based and encompasses the Brazilian legal potable water requirements (https://cevsadmin.rs.gov.br/upload/arquivos/201804/26143402-anexo-xx.pdf), and is even more restrictive in terms of monitoring routines. Also, compliance with our standards/procedures is periodically verified in the operational units (internal audits). Note: for facilities outside Brazil, the N-2920 Standard establishes that they must comply with local legislation and requirements regarding water for human use.

Regarding water use in the vicinity of our operations, we must say that, in Brazil, all waters are public domain. In order to allocate safe water for the multiple uses/users in a river basin, including society in general, while still preserving ecological functions, public water management organizations define the maximum water flows each user can withdraw, based upon conservative/restrictive hydrological criteria. Thus, withdrawing more water than authorized is illegal. The goal is to harmonize the different interests and to maintain access to water for different stakeholders and society. Furthermore, regulation establishes that, in scarcity situations, human consumption is the prior use to be supplied, which means that all other users should reduce their withdrawals.

Our facilities respect the legally permitted maximum volumes and, at corporate level, we did not have knowledge of any significant impact in quantity, distribution of freshwater and water accessibility occasioned by one of our operational units or activities.

In order to contribute with water stewardship at river basins where our facilities are located, Petrobras also participates in 21 Watershed Committees in Brazil, which are normative, consultative and deliberative forums, where water management in the basin is discussed, and where different stakeholders (government, users and civil society entities) participate.

Access to safe water and sanitation for our vicinities: Qualitative aspects

About water quality, national and local environmental regulations and organizations in Brazil establish the standards (maximum limits of several quality parameters) for wastewater discharged at water bodies, in order to protect freshwater quality of the receiving bodies. Effluents discharged by Petrobras are previously treated in order to comply with the regulations. At corporate level, we did not have knowledge of any significant impact in quality of freshwater resources at our vicinities caused by effluent discharges of our operational units or activities.



PUBLICLY AVAILABLE DOCUMENTS:

2018SustainabilityReporthttp://www.petrobras.com.br/en/society-and-environment/integrated-report/pages58-62 (Water Resource Management) and 82-88 (Socialand Environmental Investment).

"WATER AT PETROBRAS" REPORT - 2017:

There is, publicly available, a detailed report specific on water management at Petrobras, with information about our actions and socioenvironmental projects related to the theme (All pages. Main pages to look = 9 to 11).

http://www.petrobras.com.br/lumis/portal/file/fileDownload.jsp?fileId=8A193576621AF7E00162 449D75C54986

http://www.petrobras.com.br/en/society-and-environment/environment/water-resources/