



## Conflicts of Interest Policy

Our employees, interns, outsourced personnel, members of the Board of Directors, Statutory Audit Committee, officers, executives, representatives and other collaborators of QGEP PARTICIPAÇÕES S.A. and its controlled companies (“**QGEP**”), whether suppliers, temporary consultants or third parties acting on behalf of QGEP (“**Collaborators**”) are obliged to avoid and report circumstances that may generate conflicts between: (i) personal interests and the interests of QGEP; and (ii) public interests and the interests of QGEP.

It is understood that there is a conflict of interest when the personal interests of Collaborators may interfere in the performance of their professional activities or come into conflict with the legitimate interests of QGEP.

In this regard, the following are examples of situations that may create a conflict of interest:

- **Contracts signed with QGEP** which in some way involve the Collaborator’s Family members and contain terms and conditions different from customary market practices;
- **Contracting or maintaining business relations** with companies belonging to Public Agents or Third Parties or their Family members with the intent to sway decisions by the Public Agent;
- **Using privileged information of QGEP** or furnished by a Public Agent or Third Parties who were obliged to keep it in secret;
- **Taking advantage of their post or position at QGEP** or QGEP’s privileged information to obtain personal profit or advantage;
- **Using Family relations between a Public Agent and a Collaborator or Representative** to obtain preferential treatment that may benefit QGEP;

- **Maintaining an investment or professional interest** that hinders performance of their functions at QGEP in an objective and loyal manner; and
- **Hiring a public servant subject to the quarantine period**, as set forth in Law No. 12,813, of 2013, or other applicable legislation.

To avoid situations that may result in a conflict of interest, do not compete with the business of QGEP, nor allow your personal interests and/or those of your family to harm the interests of QGEP.

If the Collaborator identifies that they are facing a Conflict of Interest, either potential, apparent or real, they should immediately contact the QGEP Compliance Officer.

To discuss a possible conflict of interest or to denounce an actual, potential or apparent conflict, QGEP Collaborators shall use QGEP's communication channel, accessible at [www.qgеп.com.br](http://www.qgеп.com.br). At this webpage, the Collaborator shall send a message to the Compliance Officer outlining their concern (by describing in detail the apparent conflict) or, in the case of whistle-blowing, by completing the form attached to the Anticorruption Policy addressed to the Compliance Officer<sup>1</sup>. We remind you that whistle-blowing may be done anonymously.

Moreover, a Collaborator who is faced with a Conflict of Interest is obliged to refrain from participating in any decision-making process or discussion related to the matter in which he has a potential, apparent or real Conflict of Interest.

Do bear in mind that reports of circumstances indicating a violation and accusations of a violation of the Code of Conduct, QGEP's policies, procedures and regulations or of anticorruption laws are serious situations and, therefore, reports or accusations made mistakenly may result in the application of disciplinary measures.

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<sup>1</sup> In sharing their concern with the Compliance Officer, the Collaborator shall identify themselves to be permit the receipt of a reply before deciding whether or not to make the accusation. The accusation, in its turn, may be made anonymously, as established in the Anticorruption Policy.

### Attention!

If you have any personal relationship with a Public Agent, a Third Party, or their Family members, and such Public Agent's or Third Party's decisions may influence/benefit QGEP, albeit indirectly, you must inform your supervisor and the Compliance Officer immediately of this personal relationship.

### WHAT IS IT? .....

For the purposes of this policy, the following are considered:

**Public Agent:** any person who works or exercises a post at a public body or at a company controlled by the government, albeit temporarily or without pay (e.g. municipal, state and federal police officers and guards, military personnel, public servants in general, from any spheres of the government – cities, states and the Union, admitted by public examination or not, government inspectors and agents, employees of Petrobras, licensing agencies, such as IBAMA, staff of regulatory agencies, such as: CVM, ANP, etc.). Leaders of political parties and candidates for elective office are also considered Public Agents.

**Third Party:** any person whose decisions may influence, albeit indirectly, the interests and business of QGEP (i.e. for purposes of private corruption).

**Family members:** parents, spouse, children, siblings, grandchildren, grandparents, brothers and sisters in-law and first-degree cousins.

