

**Corporate Human Rights Benchmark
2023 Company Scorecard**

Company name Petrobras
Sector Extractives
Overall score 28.7 out of 100

Theme score	Out of	For theme
2.2	10	A. Governance and Policy Commitments
5.2	25	B. Embedding Respect and Human Rights Due Diligence
7.5	20	C. Remedies and Grievance Mechanisms
11.8	25	D. Performance: Company Human Rights Practices
2.1	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2022 Methodology document for the sector concerned. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policy Commitments (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: General HRs commitment: The Social Responsibility policy states that 'in all our activities, we commit 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 Company has provided additional comments regarding this subindicator, however, key information was already in use. [Social Responsibility Policy, N/A: petrobras.com.br] <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Commitment to UNGPs: The Human Rights Guidelines document states that 'our work in Human Rights is guided by the united Nations Guiding Principles on Business and human Rights, and is structured into four axes [...]'. However, 'guided by' is not considered a formal statement of commitment according to CHRB wording criteria. The Company has provided additional comments regarding this subindicator, however, no publicly available policy statement committing it to respecting the UN Guiding Principles on Business and Human Rights found. [Human Rights Guidelines, 2020: petrobras.com.br] Not Met: Commitment to OECD MNE Guidelines
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Commitment to ILO core principles: The Human Rights Guidelines (policy) states that 'we are committed to [...] act in accordance with [...] the international treaties and conventions ratified by the government, such as the [...] Declaration of Fundamental Principles and Rights in the International Labor Organization-ILO'. The

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	Principles and Rights at Work		<p>Company has provided additional comments regarding this subindicator, however, key information was already in use. [Human Rights Guidelines, 2020: petrobras.com.br]</p> <ul style="list-style-type: none"> • Not Met: Explicitly lists all four ILO core principles: The human Rights Guidelines (policy) commits to 'respect freedom of association and collective bargaining', 'promote diversity, guaranteeing respect for differences and equal opportunities in access, compensation, and job promotions; fight prejudice and discrimination as a result of [...]'. No evidence found, however, of commitments against child and forced labour in its own operations. Commitments to these issues are expressed in a business partners context: 'not tolerate the occurrence of degrading or slave-like work practices, as well as not tolerate disrespect for the rights of children and adolescents, in our supply chain'. Similar commitment in relation to forced and child labour can be found in the Company's code of ethical conduct. The Company has provided additional sources to the subindicator, however, one of them was already in use and two others were in Portuguese and only documents in English are accepted according to CHRB criterion. No further evidence found. [Human Rights Guidelines, 2020: petrobras.com.br] & [Code of ethical conduct, 30/11/2022: petrobras.com.br] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects BPs/JVs to commit to ILO core principles: The Company's human rights guidelines (policy), in relation to 'involvement with the supply chain and partners' states that 'require from our suppliers and partners compliance with fundamental labor principles, as recommended by the International Labor Organization - ILO'. The Company has provided additional comments regarding this subindicator, however, key information was already in use. [Human Rights Guidelines, 2020: petrobras.com.br] • Not Met: Explicitly lists all four ILO core principles for BPs/JVs: The supplier code (applies to all suppliers [...] who may be involved in business processes with Petrobras [...]) states that 'the supplier must promote the validation of gender equity, ensuring non-discrimination in labor relations [...]'. The Code also refers to non-discrimination in a disability context. No general requirement to non-discrimination (of any kind) was found. It also requires 'not using child labor, [...], nor using a workforce in conditions of slavery or analogous to slavery, demanding the same posture from its own suppliers and contractors'. No evidence was found in relation to freedom of association and collective bargaining. The Company has provided additional comments regarding this subindicator, however, key information was already in use. No further evidence found. [Ethical conduct guide for suppliers, N/A: petrobras.com.br]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to respect H&S of workers: The Safety, Environment and Health policy states that 'by incorporating health, safety and environment to our corporate strategy, we reassert the commitment of all of our employees and contractors to the pursuit of excellence in these areas' [...] 'our activities must be in compliance with the current health, safety and environment legislation'. It also states that 'The Company's workforce, committed to caring for life and the environment and promoting ethical and safe behavior, is also committed to: Reduce risks to people's health and safety and strengthen process safety; take care of one another in the workplace and, in doubt, stop and seek help; [...]'. The Company has provided additional comments regarding this subindicator, however, key information was already in use. [Safety, environment, and health policy, N/A: api.mziq.com] • Not Met: Commitment to ILO working hours standards or 48 hour regular work week: The Human Rights Guidelines indicates: 'We are committed to [...] act in accordance with the precepts of the Federal Constitution and with the international treaties and conventions ratified by the government, such as the International Charter of Human Rights and Declaration of Fundamental Principles and Rights in the International Labor Organization-ILO'. The Human Rights and Corporate Citizenship Supplement notes: 'We have employees working under administrative regime and special regimes (shifts, on notice, among others). The expected weekly workload varies according to the regime in which the employee is engaged. Hours resulting from overtime work can be accumulated in attendance balances, such as an overtime hour bank, or paid as overtime and depend on management approval'. However, no evidence was found of a commitment to respect ILO standards on working hours, which includes considerations for the extractive sector. Moreover, only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [Human Rights Guidelines,

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			<p>2020: petrobras.com.br & [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects BPs/JVs to commit to H&S of workers: The supplier code indicates that 'The supplier, its employees and subcontractors, engaged in [...] promoting safe and ethical behavior, committing [...] to: Reducing risks to safety and health and strengthening safety of processes; Caring about one another in work environment and, in doubt, stop and seeking help; [...]'. The Company has provided additional comments regarding this subindicator, however, key information was already in use. [Ethical conduct guide for suppliers, N/A: petrobras.com.br] • Not Met: Expects BPs/JVs to commit to ILO working hours standards or 48 hour regular work week: The Ethical Conduct Guide for Suppliers states: 'The suppliers [...] commit to: Respecting internationally recognized human rights, according to the provisions of the [...] International Labor Organization Declaration on the Fundamental Rights and Principles of Labor. [...] The supplier must provide decent work conditions to its employees, ensuring compliance with the labor legislation of each country, demanding a similar stance from its (sub)suppliers. In countries where the current legislation is less protective than international law, the latter's standards apply'. However, no formal [and explicit] commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [Ethical conduct guide for suppliers, N/A: petrobras.com.br]
A.1.3.a.EX	Commitment to respect human rights particularly relevant to the sector – land, natural resources and indigenous peoples' rights (EX)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commitment to respect land ownership/natural resources as in VGGT: The Human Rights Guidelines states: 'Eviction and resettlement of communities include cases of physical displacement (eviction and loss of housing) and economic displacement (loss of assets or access to assets leading to situations of loss of income or livelihoods) caused by land acquisitions or restrictions on access and use. The guideline states that we must: i) avoid or reduce as much as possible the need for physical and/or economic displacement of individuals and communities; [...] treat the affected social segments equally, seeking actions that guarantee similar or better living conditions than the existing ones, as well as the maintenance of social and cultural relations'. The Guidelines for the Removal and Resettlement of Communities indicates: 'Avoid or minimize the need for displacement of communities. [...] When the displacement of communities is necessary, there should be equal treatment between the affected social segments'. However, no evidence found of a commitment to respect ownership/use of land and natural resources and respect legitimate tenure rights related to the ownership and use of land and natural resources as set out in the Voluntary Guidelines on the Responsible Governance of Tenure of Land (VGGT). Alternatively, it could be according to the IFC Performance Standards. Moreover, in the context of indigenous peoples (see below) the Company refers to access to land, however, no evidence found of a formal policy statement to VGGT found. [Guidelines for the Removal and Resettlement of Communities, N/A: api.mziq.com] & [Guidelines for the Removal and Resettlement of Communities, N/A: api.mziq.com] • Not Met: Commitment to respect land ownership/natural resources as in IFC Performance Standards • Met: Commitment to respect indigenous rights or ILO No.169 or UN Declaration: The Human rights principles, includes the following requirement in relation to relationship with communities: 'respect the rights of indigenous peoples and traditional communities, their self-determination, access to land, their livelihoods, and their cultural and social principles'. The Company has provided additional comments regarding this subindicator, however, key information was already in use. [Human Rights Guidelines, 2020: petrobras.com.br] • Not Met: Expects EX BPs to make these commitments: See above. Regarding the involvement with the supply chain and partners, the Human Rights Guidelines states: 'Ensure the deployment of our ethical principles and commitment to respect Human Rights with our supply chain and partners'. The Ethical Conduct Guide for Suppliers indicates: 'The suppliers [...] commit to: [...] Communicating the surrounding communities about activities affecting their daily life, so as to minimize impacts/risks, disturbances and conflicts arising from the execution of their relation with Petrobras; Offer reparations to communities for damages arising from its activities'. As for business partners Health, environment, work safety and climate change mitigation expectations: 'Preventing and mitigating environmental impacts arising from its activities and products, [...]; Preventing, monitoring and controlling the impacts of their activities on the communities where they act'. Lastly,

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			<p>concerning community relations and business partners: 'Each community possesses its own characteristics, defined from its history and social relations, represented by values, interaction forms and identity, all of which must be respected. From these premises, Petrobras encourages the supplier to establish relationships with the communities situated in its service area, based on continuous and transparent dialogue, contributing to the viability of its activities and local development, while also demanding a similar stance from its (sub)suppliers'. The Human Rights and Corporate Citizenship Supplement adds: 'In all contracting processes, we provide HSE and SR guidelines applicable to our suppliers, who must: "Respect internationally recognized human rights as set out in the International Bill of Human Rights, the International Labor Organization Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights ("Guiding Principles") and Decree n. 9571 of November 21, 2018 and other applicable legislation"'. However, no policy statement found explicitly expecting suppliers to commit to respect ownership/use of land and natural resources and respect legitimate tenure rights related to the ownership and use of land and natural resources as set out in the Voluntary Guidelines on the Responsible Governance of Tenure of Land (VGGT) or the IFC Performance Standards. Moreover, only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [Human Rights Guidelines, 2020: petrobras.com.br] & [Ethical conduct guide for suppliers, N/A: petrobras.com.br]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to obtain FPIC or zero tolerance to land grabbing: The Guidelines for the Removal and Resettlement of Communities indicates: 'Indigenous peoples must be informed through the aforementioned communication plan, in appropriate and accessible language, about projects that may occur on their land and have the opportunity to give or deny consent to a project before it starts. If the removal and resettlement of indigenous or quilombola communities is absolutely essential, it will be necessary to first carry out a free and informed consultation directed at these communities. The prior consultation seeks effective participation of indigenous or quilombola communities in the administrative and legislative decision-making process, guaranteeing the participation of these communities in consultations or public hearings in the licensing process that may take place through a representative body'. However, no publicly available policy statement committing it to obtain the free prior and informed consent (FPIC) from indigenous peoples and local communities for transaction(s) involving land and natural resources found. Alternatively, the Company could commit to a zero tolerance for land grabbing. [Guidelines for the Removal and Resettlement of Communities, N/A: api.mziq.com] • Not Met: Commitment to respect the right to water: The Human Rights Guidelines states: 'Respect the right to an ecologically balanced environment, identifying and mitigating potential risks arising from operational activities'. The Code of Ethical Conduct adds: 'Available natural resources should be used in a rational way; therefore, the preservation of the environment and sustainable development are principles that must be observed in all actions of the company in favor of the present and future generations'. It also devotes website and reporting space to water management, and indicates, in its 2021 Sustainability report, that participates in the 'Brazilian Business Commitment to Water Security - Brazilian Business Council for Sustainable Development (CEBDS)'. However, no formal policy commitment was found to respect the right to water. Moreover, only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [Human Rights Guidelines, 2020: petrobras.com.br] & [Sustainability report 2021, 2022: api.mziq.com] • Not Met: Expects EX BPs to make these commitments: The Ethical Conduct Guide for Suppliers states it expects suppliers to 'Communicating the surrounding communities about activities affecting their daily life, so as to minimize impacts/risks, disturbances and conflicts arising from the execution of their relation with Petrobras; Offer reparations to communities for damages arising from its activities'. Also, 'The supplier, its employees and subcontractors, engaged in caring about life, the environment and promoting safe and ethical behavior, committing, while also demanding a similar stance from its (sub)suppliers, to: [...] Preventing and mitigating environmental impacts arising from its activities and products, seeking improvement in environmental quality; Ensuring the origin traceability of wood directly or indirectly used in the execution of its activities, in order to certify its production is ecologically adequate, socially fair and economically viable; Preventing, monitoring and controlling the impacts of their activities on the communities where they act; Consider the specific HSE requirements established

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			for their activities; Bolstering the HSE and Climate change mitigation culture by focusing in education, training, awareness raising and shared learning and experience; Communicating HSE and Climate change mitigation information and performance in a transparent way'. However, it is not clear the Company expects extractive business partners to commit to respect the water to water and to respect ownership/use of land and natural resources also to include a commitment to obtain the free prior and informed consent (FPIC) from indigenous peoples and local communities or to a zero tolerance for land grabbing. [Ethical conduct guide for suppliers, N/A: petrobras.com.br]
A.1.3.b.EX	Commitment to respect human rights particularly relevant to the sector – security (EX)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commitment to Voluntary Principles on Security and HRs: The Protective Intelligence and Corporate Security Policy indicates: 'Protective intelligence and corporate security actions are carried out in accordance with current legislation and respecting Human Rights, in compliance with internal and external legal requirements, recommendations and related technical standards. [...] Provide and guide property security in the units and facilities, ensuring the protection of the workforce and assets and respect for Human Rights'. The Company provides further comments on virtual lectures on human rights for the Intelligence and Corporate Security area workforce. However, this subindicator looks for a publicly available policy statement committing it to respect the Voluntary Principles on Security and Human Rights (VPs). Moreover, only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [Protective Intelligence and Corporate Security Policy, N/A: api.mziq.com] • Not Met: Uses only ICoCA members as security providers: The Company has provided comments regarding this subindicator, however, some of its content has not been found in publicly available sources and no publicly available policy statement committing it only uses security providers who are members of the International Code of Conduct of Private Security Providers Association (ICoCA) found. • Not Met: Commits to International Humanitarian Law: The Company has provided comments regarding this subindicator, however, some of its content has not been found in publicly available sources. Moreover, no publicly available policy statement committing it to respect international humanitarian law (IHL) found. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Expects EX BPs to commit to these rights: The Ethical Conduct Guide for Suppliers states: 'The suppliers, demanding a similar stance from its (sub)suppliers, commit to: [...] Not performing acts that characterize excessive force in interactions between security personnel, communities and workers'. However, no evidence found that it expects its business partners to respect the Voluntary Principles on Security and Human Rights (VPs) or to only uses security providers who are members of the International Code of Conduct of Private Security Providers Association (ICoCA) as well as to commit to respect international humanitarian law (IHL). [Ethical conduct guide for suppliers, N/A: petrobras.com.br]
A.1.4	Commitment to remedy	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to remedy adverse HRs impacts: The Company's code of conduct includes a commitment to 'Prevent, identify, evaluate, and monitor the risks and social impacts of our activities in the communities where we operate as well as mitigate, remedy and repair any negative impacts on human rights'. [Code of ethical conduct, 30/11/2022: petrobras.com.br] • Not Met: Expects EX BPs to make this commitments: The Ethical Conduct Guide for Suppliers states: 'The suppliers [...] commit to: [...] Communicating the surrounding communities about activities affecting their daily life, so as to minimize impacts/risks, disturbances and conflicts arising from the execution of their relation with Petrobras; Offer reparations to communities for damages arising from its activities'. Moreover, regarding health, environment, work safety and climate change mitigation, it adds suppliers should: 'Preventing and mitigating environmental impacts arising from its activities and products, seeking improvement in environmental quality'. As for community relations: 'Each community possesses its own characteristics, defined from its history and social relations, represented by values, interaction forms and identity, all of which must be respected. From these premises, Petrobras encourages the supplier to establish relationships with the communities situated in its service area, based on continuous and transparent dialogue, contributing to the viability of its activities and local development, while also demanding a similar stance from its (sub)suppliers'. However, no evidence found that it expects its suppliers to commit

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			<p>it to remedy the adverse impacts on individuals and workers and communities that it has caused or contributed to. [Ethical conduct guide for suppliers, N/A: petrobras.com.br]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms: The 2022 Human Rights and Corporate Citizenship Supplement notes: ‘after the creation of guidelines for the conclusion of agreements in large-scale processes, especially labor claims involving outsourced employees, we have actively participated in the conciliation weeks promoted by the Labor Court, doubling the number of agreements signed in comparison to last year. Also, a Technical Cooperation Agreement was signed in 2022 with the Regional Labor Court of the 20th Region (Sergipe) with the aim of implementing a system for assigning conciliation hearings in processes that fall within our guidelines, which will contribute to increase the number of agreements and improve the company’s image with the Judiciary and other stakeholders’. However, no policy statement committing it to collaborating with judicial or non-judicial mechanisms to provide access to remedy found, only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] • Not Met: Commitment to work with EX BPs on remedy: The Ethical Conduct Guide for Suppliers states: ‘The suppliers [...] commit to: [...] Communicating the surrounding communities about activities affecting their daily life, so as to minimize impacts/risks, disturbances and conflicts arising from the execution of their relation with Petrobras; Offer reparations to communities for damages arising from its activities’. Moreover, regarding health, environment, work safety and climate change mitigation, it adds suppliers should: ‘Preventing and mitigating environmental impacts arising from its activities and products, seeking improvement in environmental quality. [...] Preventing, monitoring and controlling the impacts of their activities on the communities where they act’. As for community relations: ‘Each community possesses its own characteristics, defined from its history and social relations, represented by values, interaction forms and identity, all of which must be respected. From these premises, Petrobras encourages the supplier to establish relationships with the communities situated in its service area, based on continuous and transparent dialogue, contributing to the viability of its activities and local development, while also demanding a similar stance from its (sub)suppliers’. However, this subindicator looks for a commitment to work with suppliers to remedy adverse impacts which are directly linked to the Company’s operations, products or services found. [Ethical conduct guide for suppliers, N/A: petrobras.com.br]
A.1.5	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Zero tolerance of threats/attacks on HRDs • Not Met: Expects BPs to make this commitment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to working with HRDs to create safe and enabling environment: The Company has provided comments regarding this subindicator disclosing different human rights related events and meetings held by the Company. However, this subindicator looks for a commitment to work with suppliers to remedy adverse impacts which are directly linked to the Company’s operations, products or services found. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]

A.2 Board Level Accountability (5% of Total)

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A.2.1	Commitment from the top	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Board level responsibility for HRs: The 2022 Human Rights and Corporate Citizenship Supplement notes: 'The Board of Directors has six advisory committees, with specific powers of analysis and recommendation on certain matters, linked directly to this body, with the Health, Safety and Environment Committee (CSMS) responsible for advising the Board of Directors on matters related to sustainability, including establishment of policies and guidelines related to the strategic management of HSE, [...] social responsibility, among other issues. Among the attributions of the CSMS is the monitoring of the management and mitigation of the most severe risks related to sustainability, with emphasis on the impact on the environmental and life dimensions and on the image and reputation of Petrobras and its equity interests. The committee is also responsible for monitoring indicators and relevant sustainability issues at Petrobras and our ESG (environmental, social and governance) commitments, which include the commitment to human rights promotion and due diligence'. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] • Not Met: Describes HRs expertise of Board member: The Company has provided comments regarding this subindicator, however, some of its content has not been found in publicly available sources. <p>Score 2</p> <ul style="list-style-type: none"> • Met: Board member/CEO signal importance of HRs in their communications: The 2022 Human Rights and Corporate Citizenship Supplement includes a letter from the CEO which states, which includes, among other comments, the following: 'Respect for human rights is a crosscutting theme for our company. We annually seek to overcome challenges that arise in a broader context of society, influenced by historical and cultural circumstances, but which do not justify inaction. On the contrary, they call for even more reflecting and action, not only with the aim of promoting and respecting human rights, but strongly fighting possible violations, not only in our operations, but in the communities where we operate, in the supply chain and our business partners. We are committed to the socioeconomic development of the places where we operate and to improving the quality of life of society as a whole, respecting human rights and the environment, in accordance with the principles of the United Nations Global Compact and the Guiding Principles on Business and Human Rights and inspired by the Sustainable Development Goals. [...] The publication of the Human Rights Guidelines at Petrobras, the constitution of the Human Rights Commission and the establishment of specific human rights commitments in our Strategic Plan have been dictating our way of acting and overcoming greater challenges that benefit our organizational climate, our relationships, and our business. [...] Our commitment to life is a non-negotiable value and we reaffirm our zero-fatality ambition. However, with deep regret, we reported five fatalities in 2022, which demonstrates that our recognized safety culture is tested every day and that our battle is constant, daily and there is always room for improvement. Our physical and mental health promotion programs focus on promoting quality of life and well-being and reducing workers' health risks and vulnerabilities. Our human rights agenda, established by the Petrobras Human Rights Guidelines, made it possible for 25 actions planned for 2022 to be implemented [...]. Our engagement with communities takes place through public hearings, social communication programs, community relations and socio-environmental investment. We have systems for managing social risks in investment projects and for decommissioning and divestment, allowing us to anticipate possible human rights violations or other social impacts. [...] We strive to respond and deal with recurrent requests from communities through actions foreseen in the business units' social responsibility plans and we prioritize traditional peoples and communities: fishers, Caiçaras, Quilombolas, Indigenous, riverside and Terreiro communities. [...] We recognize that a large number of advances are still needed towards a more just, equi-table and egalitarian society. It is Petrobras' duty to lead by example and be a reference in promoting diversity, respect for people, justice, and human rights'. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]
A.2.2	Board responsibility	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Process to review HRs strategy at board level: The 2022 Sustainability Report notes: 'The Statutory Audit Committee and the Health, Safety and Environment Committee communicate critical ESG issues through periodic reports to the Board of Directors, who become aware of the critical issues forwarded by the various areas of the company'. It expands on the Committee main attributions: 'Assist the Board of Directors in establishing policies and guidelines related to the

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			<p>strategic ESG (Environmental, Social and Governance) management of HSE, [...] social responsibility, among other matters. This committee also monitors HSE indicators [...]. The Report discloses a table with 'some of the main issues marked as critical by Governance in conjunction with the competent areas'. It includes: 'Human Rights guidelines and policies in effect at the Company', the frequency 'with which they were reported to the committees for their decision-making in 2022' was one. The 2022 Human Rights and Corporate Citizenship Supplement notes: 'The committee is also responsible for monitoring indicators and relevant sustainability issues at Petrobras and our ESG (environmental, social and governance) commitments, which include the commitment to human rights promotion and due diligence'. [2022 Sustainability Report, 2023: api.mziq.com] & [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]</p> <ul style="list-style-type: none"> • Not Met: Example of HRs issues/trends discussed in last reporting period: The 2022 Sustainability Report notes: 'The Statutory Audit Committee and the Health, Safety and Environment Committee communicate critical ESG issues through periodic reports to the Board of Directors, who become aware of the critical issues forwarded by the various areas of the company'. The Report discloses a table with 'some of the main issues marked as critical by Governance in conjunction with the competent areas'. It includes: 'Human Rights guidelines and policies in effect at the Company', the frequency 'with which they were reported to the committees for their decision-making in 2022' was one. However, no further details found. [2022 Sustainability Report, 2023: api.mziq.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Describes how affected stakeholders / HRs experts inform board discussions: The Company has provided sources to the subindicator, however, they were in Portuguese and only documents in English are accepted according to CHRB criterion. In addition, the subindicator looks for a description of how the experiences of affected stakeholders or external human rights experts informed these discussions, which could not be found.
A.2.3	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: At least one board member incentive linked to HRs commitments: The 2022 Human Rights and Corporate Citizenship Supplement notes: 'The 2023-2027 Strategic Plan (SP 2023-27) proposes a set of strategies aimed at an effective contribution by Petrobras to a prosperous and sus-tainable future. In order to ensure the alignment of incentives for achiev-ing corporate goals, the plan reaffirms the four top metrics of the past plan, which are: [...] Recordable Injury Frequency Rate (TAR), [...]'. However, it is not clear how these metrics are linked to a Board member incentive or performance management scheme. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S: See above. However, it is not clear how these metrics are linked to a Board member incentive or performance management scheme. Anyhow, if it was linked to Board member incentive, the Company would have to provide evidence indicating it included the health and safety of local communities, or workers in the supply chain. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] • Not Met: Performance criteria linked to HRs made public • Not Met: Review of other board incentives for coherence with HRs policies: The Company has provided comments regarding this subindicator, however, no material evidence found.
A.2.4	Business model strategy and risks	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board process to review business model and strategy for HRs risks: The 2022 Sustainability Report notes: 'Our Bylaws define that the Board of Directors is responsible, among other things, for establishing the general orientation of our business, defining our mission, our strategic objectives, and our guidelines. It is also responsible for approving, as proposed by the Executive Board, the strategic plan, and its respective multi-annual plans, [...]'. The Health, Safety, and Environment Committee 'Assist[s] the Board of Directors in establishing policies and guidelines related to the strategic ESG (Environmental, Social and Governance) management of HSE, climate change, transition to a low carbon economy, social responsibility, among other matters. This committee also monitors HSE indicators and image and reputation surveys, suggesting actions when necessary'. Also: 'Our risk management process is coordinated by a

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>corporate area, allowing the standardization and uniformization of our risk analyses and the management of risk responsibilities, which are structured according to a model with three lines. In this model, each group of managers that make up the lines plays a distinct role in the governance structure. This presupposes a set of continuous and integrated activities, supported by a structure that comprises, in practice, the Board of Directors, the Executive Board, members of the general structure and all employees, service providers, and other involved parties. The organizational units, in conjunction with the Executive Risk Management Department, are responsible for the identification, assessment and treatment of risks. Strategic risks are reported quarterly to the Executive Committee - Risk, Executive Board, Statutory Audit Committee and to the Board of Directors, and high and very high risks are reported monthly to the Statutory Audit Committee. The effectiveness of the risk management process is assessed by the Internal Auditors, a body directly subordinated to the Board of Directors’.</p> <p>However, no description found of the process it has in place to discuss and review its business model and strategy specifically for inherent risks to human rights at Board level or a Board committee. [2022 Sustainability Report, 2023: api.mziq.com]</p> <ul style="list-style-type: none"> • Not Met: Describes frequency and triggers for reviewing business model: The 2022 Human Rights and Corporate Citizenship Supplement notes: ‘Annually, the Board approves Petrobras’ Strategic Plan, which includes our ESG strategy’. The 2023-2027 Strategic Plan include Recordable Injury Frequency Rate (TAR). Moreover, ‘we develop social and environmental risk management processes throughout the life cycle of our businesses. The main purpose of managing social and environmental risks is to prevent negative impacts resulting from the interaction between our activities, society, and the environment’. However, this subindicator looks for a description of the frequency of and triggers for reviewing its business model or strategy and potential impacts on human rights. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions resulting from reviews: The 2022 Human Rights and Corporate Citizenship Supplement notes: ‘In the 2023-27 Strategic Plan, approved in November 2022, we maintained the following specific commitments to human rights: [...] 100% of employees trained in human rights by 2025; 100% of operations with due diligence on human rights by 2025; Promotion of diversity, providing an inclusive work environment’. However, no example found of an action taken as a result of a discussion and review of its business model and strategy for inherent risks to human rights at Board level or a Board committee. The Company is expected to provide an example that reflects a change in organisation structure because of specific human rights inherent risk. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Senior responsibility for HRs implementation and decision making: The 2022 Human Rights and Corporate Citizenship Supplement notes: ‘our main decisions are taken jointly (Board of Directors and Executive Board) or shared, requiring at least two managers to approve the act. [...] The decision-making process on economic, social, and environmental topics involves several structures of our corporate governance, including the Board of Directors and the Executive Board. [...] The Executive Committee for Health, Safety and Environment (CE-HSE), one of the committees that advise our Executive Board regarding these aspects, is made up of executives from the corporate and operational areas. [...] The Chief Institutional Relations & Sustainability Officer and the Chief Governance and Compliance Officer are responsible for ESG-related themes’. The Company discloses a ESG chart that ‘guides planning and engagement with stakeholders and is in line with the Company’s strategic elements. Four key ideas are highlighted: [...] (iii) take care of people [...]. The 2022 Sustainability Report names the commitments ‘related to of the four main ideas’. The idea ‘Care for People’ include: ‘promote human rights and diligence the operations (100% training of employees in HR and 100% of due diligence in HR) by 2025’. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] & [2022 Sustainability Report, 2023: api.mziq.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes day-to-day responsibility for implementing HRs commitments: The 2022 Human Rights and Corporate Citizenship Supplement notes: ‘In January 2021, we constituted the Petrobras Human Rights Commission, which is responsible for managing the implementation of the human rights agenda established by the Petrobras Human Rights Guidelines, in an integrated, broad, and transversal way in the company’s business. Coordinated by the Social Responsibility Executive Management, the commission is made up of 24 areas of the company and 48 members, and is split into three subcommittees, which are linked to three ESG commitments focused on human rights set out in our strategic plan’. The Human Rights Commission is divided into three sub-commissions: Human Rights Training, Diversity, Equity and Inclusion and Human Rights Due Diligence. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] • Met: Day-to-day resources and expertise allocation in own operations: See above. The 2022 Human Rights and Corporate Citizenship Supplement notes: ‘To monitor the implementation of the action plan, as well as other measures adopted to prevent and address social risks and repair impacts on human rights, the commission and its subcommittees meet monthly, sharing experiences and challenges related to the implemented actions, evaluating the effectiveness of the adopted measures, and reflecting on other possibilities for action. [...] According to the annual planning of the company and the areas, new actions have been incorporated into the plan, which ended 2022 totalling 87 actions, distributed among the subcommittees linked to the commission’. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] • Not Met: Resources and expertise allocation with EX BPs: The Company has provided comments to CHRB regarding this subindicator, indicating its suppliers expectations, how it assesses and monitors it, as well as information on its Reporting Channel. However, no description found of how it allocates resources and expertise for the day-to-day management of relevant human rights issues within its business partners. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]
B.1.2	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Senior manager incentives linked to HRs commitments: The 2022 Form 20-F notes: ‘During 2022, the scorecards of the organizational units continued to be considered as input for the assessment of members of the board, executive managers and other members of our general structure, which are reflected in the calculation of variable remuneration, and include the following items: (i) the results of our main metrics such as: Gross Debt[...], Delta EVA® [...], IAGEE and VAZO; (ii) the scores of specific metrics of each executive scorecard (represented by specific indicators and strategic initiatives that address economic, environmental and social factors); and (iii) discretionary assessment made by the immediate superior according to the employee’s profile and performance. [...] As approved by our Board of Directors and SEST, program payments must be deferred over five years as a long-term incentive (“LTI”) for members of the Executive Board (President and Directors) and, since the 2020 fiscal year, for our Executive Managers and General Managers. [...] Consequently, Executive Board and Management payments must be carried out as follows: 60% of the value of the Program must be paid in a cash instalment while 40% of the balance must be settled in four annual deferred

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>instalments'. However, it is not clear 'social factors' include any aspect linked to human rights. This subindicator looks for an incentive or performance management scheme linked to its human rights policy commitment for at least one senior manager. No further evidence found. [2022 Form 20_F, 2023: api.mziq.com]</p> <ul style="list-style-type: none"> • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S: See above. However, it is not clear there is an incentive scheme connected to any specific Human Rights salient risk. [2022 Form 20_F, 2023: api.mziq.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria linked to HRs made public: The Company has provided sources regarding this subindicator, however, no material evidence found. • Not Met: Review of other senior management incentives for coherence with HRs policies: The Company has provided comments regarding this subindicator, however, it has reviewed other senior management performance incentives to ensure coherence with its human rights policy commitment.
B.1.3	Integration with enterprise risk management	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HRs risks integrated as part of enterprise risk system: The 2022 Human Rights and Corporate Citizenship Supplement notes: 'Due to the nature and scale of our business, we have exposure to risks of violating human rights [...]. We believe that integrated and proactive risk management is essential for delivering safe and sustainable results. Our Business Risk Management Policy has as its fundamental principles respect for life in all its diversity, acting ethically and in compliance with legal and regulatory requirements, as well as full alignment and coherence with our strategic plan. Risk management is integrated with the guidelines for risk response actions that consider the possible impacts on our stakeholders and aimed at adding and preserving value for shareholders and business continuity. The drafting of our Business Risk Matrix is coordinated by the corporate risk man-agreement area and involves all areas of our structure. [...] This process provides risk identification, its associated controls, its probability of occurrence and its impact assessment, in addition to treatment propositions. The impact assessment considers four dimensions – financial, image/reputation, legal/compliance, and environmental/life. This qualitative risk analysis allows prioritizing and directing efforts related to action plans to be carried out, in order to minimize events that may adversely affect us and maximize those that may bring us benefits. Also, it may be necessary to apply a risk analysis to support decision-making, which may include a quantitative analysis that, through numerical simulations, assesses the combined effect of identified risks and other sources of uncertainty on our goals'. The 2022 Form 20-F discloses its risks factor, which include social issues: 'Our projects and operations may negatively affect different communities, especially in relation to human rights'. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] & [2022 Form 20_F, 2023: api.mziq.com] • Met: Provides an example: The 2022 Form 20-F further describes: 'Such projects [See above] and operations may also be affected by the expectations and dynamics of these populations, impacting our business, image and reputation. It is part of our policy to respect human rights, remedy violations, and maintain responsible relationships with the communities where we operate and to be diligent with suppliers and partners. However, throughout the life of projects and operations, we may inadvertently commit human rights violations in our activities, operations, and contracts in case of non-compliance with the guidelines of the Code of Ethical Conduct, the Human Rights Guidelines, and the Guide to Ethical Conduct for Suppliers, as well as any error in the process of identifying and assessing human rights risks in HR management, the supply chain, partnerships and communities. Furthermore, the various locations where we operate are exposed to a wide range of issues related to political, social and economic instability, as well as intentional acts such as illegal taps, crime, theft, sabotage, roadblocks and protests. We cannot control the changes in local dynamics and the expectations of the communities where we operate and establish our business. Social impacts arising from our direct and indirect decisions and activities – especially those related to divestments and decommissioning – and disagreements with these communities and local governments may affect the schedule or budget of our projects, hinder our operations due to possible lawsuits, have a negative financial impact and harm our image and reputation'. [2022 Form 20_F, 2023: api.mziq.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Risk assesment by Audit Committee or independent third party: The Company 'we have an internal audit, which is responsible for systematically assessing the risk management process and recommending improvements, providing senior management and governance bodies with assessments with a higher level of transparency and independence'. However, no evidence found of a

Indicator Code	Indicator name	Score (out of 2)	Explanation
			description of how it assesses the adequacy of the enterprise risk management system specifically in managing human rights during the Company's last reporting year. The assessment is expected to either be overseen by the Board Audit Committee or conducted by an independent third party. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a • Not Met: Communicates HRs policies to all workers in own operations: The 2021 Sustainability Report states: 'In 2021, we started the Human Rights (DH) Training Plan, which aims at consolidating training and awareness-raising initiatives on this topic, ensuring the breadth and reach of the company's actions, in addition to promoting a culture of respect for human rights, in alignment with our guidelines for this topic. In 2021, we had 3,384 employees with 6,768 hours of training related to human rights, which represents 8.74% of the workforce.' In its 2022-2026 strategic plan, the Company discloses that the target of training 100% of its employees on 'human rights issues'. However, it is unclear to what extent this has been achieved to date. The 2022 Human Rights and Corporate Citizenship Supplement notes: 'Engagement with our internal public takes place through digital interaction in our internal communication channels, such as intranet, social network, online communities, dissemination of messages and news, and face-to-face and virtual events. These channels cover a wide range of topics of interest to employees, such as the company's strategies, policies, initiatives and guidelines, operational results and highlights, and people management practices. On the Petrobras Portal (intranet channel) alone, in 2022 we had more than 36 million visits, with 1.5 million visits to the news section. Another highlight is Workplace Petrobras, our internal social network focused on communication and relationships. In it, communication is done through personal profiles and thematic groups. In 2022, the approximately 50,000 users created 56,000 publications and interacted with them more than 1 million times, considering comments and reactions (likes)'. It provides additional information of periodic surveys it carries out, such as the Diversity survey and the Research on female Personal Protective Equipment. However, no description found on how it proactively communicates its human rights policy commitment to all its workers, including in local languages where necessary. [Sustainability report 2021, 2022: api.mziq.com] & [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communicates HRs policies to stakeholders: The 2022 Human Rights and Corporate Citizenship Supplement notes: 'Our engagement with communities unfolds through public hearings and social communication programs, established throughout the environmental licensing processes and through the community relationship process. [...] Social participation takes place through public hearings that we hold with the participation of different bodies and communities inserted in the areas of influence of the undertaking or activity. Throughout the life cycle of the licensed enterprise, society's participation continues through the conditions of environmental licenses. These conditions include environmental education programs, which are aimed at communities in the area of influence and are based on critical, dialogical and independence -encouraging training, as well as social communication programs, which maintain active communication channels, such as Customer Service (SAC) and online information portals that provide information on operational activities and social and environmental projects developed. Customer Service is available to provide any clarifications, receive reports and complaints from communities through toll-free 24-7 help lines. Contact channels are widely publicized in the communities where we operate. The community relationship process, on the other hand, is developed in the communities located in our coverage area and is guided by a corporate standard that determines levels of engagement to be established. For each level of engagement, specific community relationship actions are recommended, which are included in local social responsibility plans, which are periodically reviewed and monitored'. However, it is not clear how it actively communicates its policy commitments to affected stakeholders, including local communities and other groups. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] • Not Met: Example of how HRs policies are accessible for intended audience: The Company notes that 'One of the main actions established in the community relationship plans are the community committees, present in 15 business units. As of the second quarter of 2022, face-to-face meetings were resumed, with 38 community committee meetings being held throughout that year. In order to expand and materialize the transparency of the results of our actions and impacts,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>since 2021, we have been publishing a digital bulletin called Lado a Lado (Side-by-Side), a communication tool aimed at the communities in the area covered by our activities. With local four-monthly editions, the bulletin brings information about our Social Responsibility actions, news related to the business units, among other topics of community interest'. However, as indicated above, it is not clear whether company's human rights policy commitments are actively communicated through these mechanisms. Furthermore, no further evidence was found on how the company ensures that the form and frequency of its communication is accessible to the intended audience [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]</p>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Meets ILO requirement for suppliers on A.1.2.a • Met: Describes steps to communicate HRs policies to EX BPs: The 2022 Human Rights and Corporate Citizenship Supplement notes: 'In 2022, we started the ESG Journey for suppliers, with the purpose of promoting supplier engagement in ESG themes, through distance learning programs (EAD) associated with human rights, compliance, health, safety, and climate, among others, as a way to improve sustainable contracting practices and supplier management. They can be accessed through on the Supplier Channel'. It further explains other human rights related initiatives. The Ethical Conduct Guide for Suppliers states: 'The suppliers, demanding a similar stance from its (sub)suppliers, commit to: [...] Respecting internationally recognized human rights, according to the provisions of [...] the International Labor Organization Declaration on the Fundamental Rights and Principles of Labor. [...] The supplier must provide decent work conditions to its employees, ensuring compliance with the labor legislation of each country, demanding a similar stance from its (sub)suppliers'. See below further details including policy communication as part of contractual procedures. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes how HRs policies are contractual/binding for suppliers: The Company states that 'We reinforce our commitments to human rights through the Petrobras Ethical Conduct Guide for Suppliers. This guide applies to all of our suppliers, regardless of whether they are residents or not in Brazil, including their affiliates and subsidiaries, who are involved in business processes (bidding, prequalification, and direct contracting), as well as those who enter into legal instruments with us (contracts, agreements, cooperation agreements, among others). Before signing a contract with us, every supplier must complete and sign the Declaration of Compliance with the Guide'. The Guide has the Company's human rights provisions. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] • Not Met: Requires EX BPs to cascade contractual/binding HRs policies to their BPs: See above. The 2022 Human Rights and Corporate Citizenship Supplement notes: 'there is also a clause prohibiting the use, in all activities related to the execution of the contract, child or slave labor, and this requirement is also included in our Ethical Conduct Guide for Suppliers, which extends this commitment to our suppliers' subcontractors'. The Ethical Conduct Guide for Suppliers states: 'The supplier, while also demanding a similar stance from its (sub)suppliers, commits to cooperate and aid audit, verification and investigation processes conducted by Petrobras or a designated third party concerning any alleged, suspected or proven non-compliance whether with the applicable national and international, whether in relation to its contractual obligations concerning Petrobras'. However, although the Company seems to expect similar provisions from its sub suppliers, it is not clear that business partners are required to cascade the commitments as part of a contractual agreement. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] & [Ethical conduct guide for suppliers, N/A: petrobras.com.br]
B.1.5	Training on Human Rights	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Score of at least 1 on A.1.2.a • Met: Describes how workers are trained on HRs policy commitments: The company states: 'In 2021, we started the Human Rights (DH) Training Plan, which aims at consolidating training and awareness-raising initiatives on this topic, ensuring the breadth and reach of the company's actions, in addition to promoting a culture of respect for human rights, in alignment with our guidelines for this topic [...]. We also started the construction of a Basic Distance Learning in human rights, with delivery perspective in the first half of 2022. The Distance Learning course brings topics such as "Human Rights Due Diligence", "Management of People and

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Human Rights” and “Communities and Human Rights”, among others. Our goal is that by 2025, 100% of our employees will have been trained in Human Rights Basic Distance Learning.’ The Company has provided additional comments regarding this subindicator, however, key information was already in use. [Sustainability report 2021, 2022: api.mziq.com]</p> <ul style="list-style-type: none"> • Not Met: Trains relevant managers including security on HRs: The 2021 Sustainability Report states: ‘With a focus on leadership, the Distance Learning Course entitled “Challenges for Leadership” was created, which addresses human rights issues, and specific training on diversity and lectures on violence at work were also made available. In 2021, this training was carried out by 98% of our leaders. In the 2022-23 scenario, Human Rights training is planned for specific audiences, such as health professionals, legal professionals, supply professionals, employees in training courses, training in Brazilian sign language (Libras), among others.’ However, it does not disclose how all security personnel is trained on human rights. The Company provides addition comments regarding this subindicator, disclosing different training courses that took place: a live broadcast on “Ableism and Unconscious Biases”; ten videos on human rights in the development path of over 750 new employees; five lectures on sexual diversity; ‘Virada Cultural da Diversidade do Jurídico’, a Legal Department’s diversity-oriented event that consisted of eight live broadcasts with in-house speakers with the aim of promoting topics related to diversity, inclusion, and well-being, aimed at employees of our Legal Department. However, this subindicator looks for a description of how security personnel receive specific human rights training relevant to their role. [Sustainability report 2021, 2022: api.mziq.com] & [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Not Met: Meets both requirements under score 1 • Not Met: Trains BPs to meet HRs commitments: The Company states that ‘In 2022, we started the ESG Journey for suppliers, with the purpose of promoting supplier engagement in ESG themes, through distance learning programs (EAD) associated with human rights, compliance, health, safety, and climate, among others, as a way to improve sustainable contracting practices and supplier management. [...] In November 2022, we partnered with the UN Global Compact to offer the Human Rights and Business Trail tool to a group of selected strategic suppliers. This sample will result in a diagnosis, in addition to raising awareness, workshops and training for participating suppliers, in order to allow mobilization on a scale, in relation to governance and critical human rights issues such as decent work, equality, inclusion, health and occupational safety’. However, although the Company indicates that it has its ESG Journey supplier programme, no description found of the human rights training provided. Moreover, although it has a partnership with UNGC, it is not clear it applies to business partners in general as it seems to focus a selected group of suppliers. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] • Not Met: Discloses % suppliers trained
B.1.6	Monitoring and corrective actions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Score of at least 1 on A.1.2.a • Not Met: Monitors implementation of HRs policy commitments across global ops and EX BPs: The Company indicats that ‘The [human rights] commission is responsible for preparing, implementing, and monitoring the progress of Petrobras’ Human Rights Action Plan, ensuring the implementation of each of the commitments related to human rights foreseen in our strategic plan [...]. To monitor the implementation of the action plan, as well as other measures adopted to prevent and address social risks and repair impacts on human rights, the commission and its subcommittees meet monthly, sharing experiences and challenges related to the implemented actions, evaluating the effectiveness of the adopted measures, and reflecting on other possibilities for action’. However, no further description found of actual monitoring process. Regarding its suppliers, it indicates: ‘Based on this guide [Ethical Conduct Guide for Suppliers] and on the standards with guidelines for the inspection of contracts for goods and services, we verify compliance with the execution of contractual clauses regarding aspects related to safety, the environment and health, as well as social responsibility. Also, we evaluate the performance and quality of our suppliers and, when necessary, apply our system of consequences, as provided in our Quality Guide for Suppliers. [...] It should be noted that, for contracts considered to be at greater risk of violating human rights, such as those with intensive use of labor, there is a specific social responsibility clause, which establishes social responsibility and human rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>commitments for contracted companies. In order to assess whether these requirements were complied with by the contracted companies in 2022, nine social responsibility assessments were carried out with service providers through a checklist, which assesses whether all contractual social responsibility requirements have been fulfilled'. However, it is not clear that if the Company has a system to monitor human rights commitments of its business partners in general. The Company is expected to description how it monitors the implementation of its human rights policy commitment across its global operations and business partners. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]</p> <ul style="list-style-type: none"> • Not Met: Discloses % of EX BP's monitored: See above. Also: 'With regard to sanctioning processes related to non-compliance in labor practices, 6 companies were sanctioned in 2022 out of a total of 44 companies sanctioned for contractual breaches. [...] Among the contracts submitted to the checklist evaluation, no contractual breach was identified'. However, it is not clear the proportion of its extractive business partners that is monitored for its Human Rights compliance. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] • Not Met: Describes how workers are involved in monitoring <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Not Met: Describes corrective actions process: The Company states that 'To monitor the implementation of the action plan, as well as other measures adopted to prevent and address social risks and repair impacts on human rights, the commission and its subcommittees meet monthly, sharing experiences and challenges related to the implemented actions, evaluating the effectiveness of the adopted measures, and reflecting on other possibilities for action'. The supplement has further explanation on the Company's due diligence process. However, no further information describing the corrective action process regarding the whole group was found. This indicator looks for the standard process it has in place to implement corrective action plans where non-compliances are found as part of the monitoring process [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] • Not Met: Discloses findings and number of correction action processes: The Company has provided comments regarding this subindicator, where it discloses information on: Processes to repair and mitigate negative impacts; its grievance mechanisms for its workforce, communities and supply chain; an example of mitigation measure [for a fishing community]. However, no further evidence found the findings of its human rights monitoring process and number of corrective action processes as a result of the monitoring. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]
B.1.7	Engaging and terminating business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HRs performance affects selection EX BPs: The 2022 Human Rights and Corporate Citizenship Supplement notes: 'in order to mitigate the compliance risks inherent in non-compliance with obligations related to human rights, fraud and corruption related to the contracting process, we carry on an Integrity Due Diligence (DDI) at our suppliers, which includes risk factors associated with slave-like, degrading and child labor. In 2022, 2,745 suppliers were assessed, with a high, medium, or low Integrity Risk Degree (IRD). Companies classified with a high Integrity Risk Degree cannot participate in contracting procedures with Petrobras, except for exceptions provided for in the Company's internal rules'. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] • Not Met: HRs performance affects ongoing BPs relationships: The report also indicates: 'In compliance with Articles 83 and 84 of Law No. 13,303/16, Petrobras' internal procedures provide for the establishment of a Commission for the Analysis and Application of Sanctions (CAASE) for cases of contractual non-compliance, such as: labor, social security or HSE non-compliance, [...] non-compliance with the Ethical Conduct Guide for Suppliers, among other conduct considered severe'. However, although the Ethical Conduct Guide for Suppliers contains the Company's human rights provisions, it is not clear the implications of non-compliance with it. Also: 'in order to mitigate the compliance risks inherent in non-compliance with obligations related to human rights [...] related to the contracting process, we carry on an Integrity Due Diligence (DDI) at our suppliers, which includes risk factors associated with slave-like, degrading and child labor. In 2022, 2,745 suppliers were assessed, with a high, medium, or low Integrity Risk Degree (IRD). Companies classified with a high Integrity Risk Degree cannot participate in contracting procedures with Petrobras, except for exceptions provided for in the Company's

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>internal rules'. However, it is not clear how human rights performance is taken into account in the in decisions to renew, expand or terminate business relationships in general, as the Company indicates it has internal exceptions. Also: 'In order to curb any degrading work practice in our supply chain, our standard contractual draft has a clause demanding a guarantee of compliance with the labor requirements provided for in current Brazilian legislation. Failure to comply with this clause entitles us to terminate the contract with the supplier'. It is not clear it applies to all extractive business partners, including those with activities outside of Brazil. This subindicator looks for evidence of how, once they are already working for the Company, their human rights performance affects their relationship. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes positive HRs incentives for business relationships: The report also states that: 'as an engagement tool, we promote the Best Suppliers Award, to annually recognize suppliers that stand out in their market niches for their high performance in the supply of goods and services to Petrobras. In its 5th edition, held in November 2022, all national or foreign companies that supplied goods or provided services to us in 2021 participated, with 22 companies being awarded in various categories. [...] In the Human Rights dimension, there were awards after the evaluation of projects related to the following topics: Promotion of diversity and inclusion; Fighting discrimination, prejudice, and harassment; Confronting slave labor; Tackling child labor; Fighting sexual exploitation of children and adolescents'. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] • Met: Works with EX BPs to meet HRs requirements: The Company indicates that 'In 2022, we started the ESG Journey for suppliers, with the purpose of promoting supplier engagement in ESG themes, through distance learning programs (EAD) associated with human rights, compliance, health, safety, and climate, among others, as a way to improve sustainable contracting practices and supplier management. [...] In the case of international suppliers, we promote events in partnership with diplomatic representations aimed at foreign companies, with the aim of clarifying doubts and encouraging the participation of this public in our tenders, always reinforcing policies and guidelines related to human rights'. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]
B.1.8	Approach to engagement with affected stakeholders	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Discloses stakeholders whose HRs may be affected: The 2022 Human Rights and Corporate Citizenship Supplement discloses the Company's main human rights issues at Petrobras according to the following stakeholders: Internal audience, suppliers, communities and partners. Rights/themes involved are 'Indigenous Peoples and Traditional Communities', 'Social Vulnerable Groups', 'Access to Livelihood and healthy environment', 'Labor Practices in the supply chain', 'Right to integrity and safe environment', and 'Land Management and Resettlement'. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] • Not Met: Provides two examples of engagement with stakeholders: The 2022 Human Rights and Corporate Citizenship Supplement discloses the example of a Corporate Women's Mentoring Program. However, this subindicator looks for examples of a dialogue between the Company and its stakeholders that enables it to hear, understand and respond to their interests and concerns in relation to human rights, and it is not clear this example fulfils the criterion. Regarding its relationship with communities 'As of the second quarter of 2022, face-to-face meetings were resumed, with 38 community committee meetings being held throughout that year'. However, it is not clear whether these engagements were in the context of human/labor rights or include issues related to these topics. It adds: 'We seek to respond and deal with recurring requests from communities through actions planned in the social responsibility plans of the business units. In addition to that, we present and discuss these issues through community committees, which gather at our operating units. We also respond to the demands of the communities in the territories where we operate through mandatory actions arising from environmental licensing conditions (such as the Environmental Education Project and Compensation Projects for Fishing Activities), as well as through voluntary actions such as the corporate social responsibility and socio-environmental investments'. However, no specific example of its actual engagement with stakeholders whose human rights have been or may be affected by its activities (or their legitimate representatives or multi-stakeholder initiatives) in the last two years. The Company is expected to provide two of such examples. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HRs issues: The Company has provided comments regarding this subindicator, disclosing data on a Research on female Personal Protective Equipment and on its grievance mechanism. However, the Company is expected to provide a summary analysis of the input/views given by stakeholders on human rights issues during engagements. No further evidence found. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] • Not Met: Describes how stakeholders views influenced company's HRs approach: The Company has provided comments regarding this subindicator, disclosing information of its actions to promote diversity, equity, and inclusion. It also indicates its plans to respond and deal with recurring requests from communities and its monthly meetings through live casts with subjects of interest to the supplier market. However, this subindicator looks for a description of how stakeholders views on human rights issues [from a proactive stakeholder engagement] have influenced the development or monitoring of its human rights approach. No further evidence found. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes process of identifying risks in own operations: The 2021 Sustainability Report states: 'We have adopted standards and processes that guide our performance in managing risks and socio-economic impacts in our operations, investment projects, decommissioning and divestments. These processes seek to prevent the violation of human rights and to strengthen the bonds of trust with the communities present in our coverage area. We identify, analyze, and respond to the possible socio-economic impacts of our operations, including the risks of human rights violations, using as a management tool the diagnosis and social analysis of communities and the Social Responsibility and Community Relationship plans in the area covered by our operations. Currently, there are 22 local plans for Social Responsibility and Community Relations, which represent 100% of our refining and exploration and production units. These plans were prepared and validated for implementation in 2021, and their actions are monitored by a management system (JIRA) that tracks the percentages planned and carried out.' The 2022 Human Rights and Corporate Citizenship Supplement notes: 'The implementation of human rights due diligence in an integrated way in all our operations, simultaneously, is a great challenge, given that our E&P [Exploration and Production] and refining activities are carried out in several operational units and distributed in different regions of the country. In this scenario, the due diligence is being implemented through a process that allows us to progressively expand its scope and continuously improve our internal processes. In 2022, we began structuring a due diligence process integrated into human rights in our operations with the elaboration of a manual. The second stage consists of implementing the process, on a pilot basis, in five own operations, three of which are E&P and two are refining. This phase is critical for assessing the full applicability of the integrated human rights due diligence, considering the participation of several areas of the company in the process'. [Sustainability report 2021, 2022: api.mziq.com] & [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>• Not Met: Describes process for identifying risks in EX BPs: The Company indicates that 'Based on this guide [Ethical Conduct Guide for Suppliers] and on the standards with guidelines for the inspection of contracts for goods and services, we verify compliance with the execution of contractual clauses regarding aspects related to safety, the environment and health, as well as social responsibility. Also, we evaluate the performance and quality of our suppliers [...] . In compliance with Articles 83 and 84 of Law No. 13,303/16, Petrobras' internal procedures provide for the establishment of a Commission for the Analysis and Application of Sanctions (CAASE) for cases of contractual non-compliance, such as: labor, social security or HSE non-compliance, [...] non-compliance with the Ethical Conduct Guide for Suppliers, among other conduct considered severe. [...] It should be noted that, for contracts considered to be at greater risk of violating human rights, such as those with intensive use of labor, there is a specific social responsibility clause, which establishes social responsibility and human rights commitments for contracted companies. In order to assess whether these requirements were complied with by the contracted companies, in 2022, nine social responsibility assessments were carried out with service providers through a check-list, which assesses whether all contractual social responsibility requirements have been fulfilled'. It adds: 'in order to mitigate the compliance risks inherent in non-compliance with obligations related to human rights, [...] we carry on an Integrity Due Diligence (DDI) at our suppliers, which includes risk factors associated with slave-like, degrading and child labor'. However, although the Company indicates it checks on compliance, it is not clear it is part of a proactive identification of human rights risks and impacts process. The description should include the process it uses to identify which are its potential human rights risks and impacts that it faces through its business partners. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]</p> <p>Score 2</p> <p>• Not Met: Describes global risk identification system incl. stakeholder consultation: The Company indicates that 'The implementation of human rights due diligence in an integrated way in all our operations,[...] the due diligence is being implemented through a process that allows us to progressively expand its scope and continuously improve our internal processes. In 2022, we began structuring a due diligence process integrated into human rights in our operations with the elaboration of a manual. The second stage consists of implementing the process, on a pilot basis, [...] This phase is critical for assessing the full applicability of the integrated human rights due diligence, considering the participation of several areas of the company in the process'. Regarding its communities, it indicates: 'we develop social and environmental risk management processes throughout the life cycle of our businesses. [...] Although it is not a formal document like the environmental license, a social license refers to the acceptance of the company's practices and business by interested parties and by public opinion in general, being obtained through approximation, creation, and maintenance of bonds of trust. Risks are classified as threats (negative risks) or opportunities (positive risks). [...] Establishing the context is the initial step that supports the entire risk management process. This step is carried out through the socioeconomic diagnosis, which consists of a translation of the reality experienced by a population in a given geographic space. During this process, municipal socioeconomic indicators and specific data from the communities mapped in the territory are consulted, such as, for example, social actors, peoples and traditional communities, existence of conflicts and existence of impacts and risks resulting from our activities. The collection of primary data can also be used, through focus groups, a survey, social cartography, and perception studies'. However, no details found on whether and how human rights experts are consulted for risk identification purposes. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Describes how risk identification system is triggered by new circumstances: The 2022 Human Rights and Corporate Citizenship Supplement notes: 'In 2022, we began structuring a due diligence process integrated into human rights in our operations with the elaboration of a manual. The second stage consists of implementing the process, on a pilot basis, in five own operations, three of which are E&P and two are refining. This phase is critical for assessing the full applicability of the integrated human rights due diligence, considering the participation of several areas of the company in the process'. It also indicates that 'Risk analyzes are carried out at all stages of the business life cycle'. However, no description found of how systems to identify its human rights risks and impacts are triggered by new country operations, new relationships, new human rights challenges or conflict affecting particular locations. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] • Not Met: Describes risks identified in relation to new circumstances: The 2021 Sustainability Report states: 'We do not have oil and gas reserves in conflict areas, as defined by the Uppsala Conflict Data Program (UFDPA). However, in 2021, we recorded eleven conflicts with local communities that we classify as significant, with the possibility of impacting operations, people, and the environment, requiring immediate attention and treatment. These conflicts were related to: blockades of roads by the communities, mobilization of communities for jobs, demonstration questioning the decommissioning of the platform and invasions of the operational area'. The Company has provided comments regarding this subindicator, explaining how it manages its social and environmental risks and how risk analyzes are carried out at all stages of the business life cycle. It then expands each phase. However, this subindicator looks for evidence of how, as consequence of the due diligence process triggered by new circumstances, the Company decides to take a specific approach. No further evidence found. [Sustainability report 2021, 2022: api.mziq.com] & [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]
B.2.2	Assessing human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes assessment process and discloses salient HRs risks: The 2021 Sustainability Report states: 'We have adopted standards and processes that guide our performance in managing risks and socio-economic impacts in our operations, investment projects, decommissioning and divestments. These processes seek to prevent the violation of human rights and to strengthen the bonds of trust with the communities present in our coverage area. We identify, analyze, and respond to the possible socio-economic impacts of our operations, including the risks of human rights violations, using as a management tool the diagnosis and social analysis of communities and the Social Responsibility and Community Relationship plans in the area covered by our operations. Currently, there are 22 local plans for Social Responsibility and Community Relations, which represent 100% of our refining and exploration and production units. These plans were prepared and validated for implementation in 2021, and their actions are monitored by a management system (JIRA) that tracks the percentages planned and carried out'. Regarding its communities, the 2022 Human Rights and Corporate Citizenship Supplement notes: 'we develop social and environmental risk management processes throughout the life cycle of our businesses. [...] Risks are classified as threats (negative risks) or opportunities (positive risks). The severity of each risk is defined by the combination of the probability of occurrence and magnitude of its respective impact, which are stipulated based on corporate rules, consisting of objective criteria for risk assessment. [...] Establishing the context is the initial step that supports the entire risk management process. This step is carried out through the socioeconomic diagnosis, which consists of a translation of the reality experienced by a population in a given geographic space. During this process, municipal socioeconomic indicators and specific data from the communities mapped in the territory are consulted, such as, for example, social actors, peoples and traditional communities, existence of conflicts and existence of impacts and risks resulting from our activities. The collection of primary data can also be used, through focus groups, a survey, social cartography, and perception studies'. However, no details found on it uses these processes to determine what are the salient human rights that it faces. [Sustainability report 2021, 2022: api.mziq.com] & [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] • Not Met: Describes how process applies to EX BPs: The Company states that 'Based on this guide [Ethical Conduct Guide for Suppliers] and on the standards with guidelines for the inspection of contracts for goods and services, we verify compliance with the execution of contractual clauses regarding aspects related to

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>safety, the environment and health, as well as social responsibility. Also, we evaluate the performance and quality of our suppliers [...] . In compliance with Articles 83 and 84 of Law No. 13,303/16, Petrobras' internal procedures provide for the establishment of a Commission for the Analysis and Application of Sanctions (CAASE) for cases of contractual non-compliance, such as: labor, social security or HSE non-compliance, [...] non-compliance with the Ethical Conduct Guide for Suppliers, among other conduct considered severe. [...] It should be noted that, for contracts considered to be at greater risk of violating human rights, such as those with intensive use of labor, there is a specific social responsibility clause, which establishes social responsibility and human rights commitments for contracted companies. In order to assess whether these requirements were complied with by the contracted companies, in 2022, nine social re-responsibility assessments were carried out with service providers through a checklist, which assesses whether all contractual social responsibility requirements have been fulfilled'. It adds: 'in order to mitigate the compliance risks inherent in non-compliance with obligations related to human rights, [...] we carry on an Integrity Due Diligence (DDI) at our suppliers, which includes risk factors associated with slave-like, degrading and child labor'. However, it is not clear the process it has in place to assess its human rights risks within its business partners. This description should include how relevant factors are taken into account, such as geographical, economic, social and other factors. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]</p> <ul style="list-style-type: none"> • Not Met: Public disclosure of results of HRs risk assessment: The 2022 Human Rights and Corporate Citizenship Supplement notes: 'Petrobras' main human rights issues were raised in 2014 with the involvement of several areas of the company'. It includes: Access to Livelihood and Healthy Environment, Socially Vulnerable Groups, Indigenous Peoples and Traditional Communities, Labor Practices in the Supply Chain, Right to Integrity and Safe Environment, Land Management and Resettlement. However, it is not clear that these are risks found as a result of due diligence processes described in the report. The Company has provided comments regarding this subindicator, disclosing data on well-being and health; Local plans for social responsibility; the number of projects were submitted to Social Responsibility; efforts to fight forced labor and child labor. However, the Company is expected to disclose the results of its assessments, which may be aggregated across its operations and locations. No further evidence found. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how assessment involved affected stakeholders: The 2021 Sustainability Report states: 'In response to the movement against the decommissioning of Cação platforms at the UNES carried out by local communities, our teams acted to promote community clarification about the safety zone around the platforms and the risks associated with the development of activities in these areas. We also had a record of invasion of the reserve tanks area at REDUC. On the occasion, the local Social Responsibility team was informed about what had happened and carried out new community awareness activities to inform about the risks of invasion of tanks by the population.' While the Company discusses one case of community engagement following a specific incident, it does not disclose how it involves affected stakeholders in assessing its human rights risks. The Company has provided additional comments regarding this subindicator, explaining how it engages with different stakeholder and its grievance channels. However, this subindicator looks for a description of how it involves affected stakeholders in the assessment processes of due diligence. No further evidence found. [Sustainability report 2021, 2022: api.mziq.com] & [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]
B.2.3	Integrating and acting on human rights risks and impact assessments	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes system to prevent, mitigate and remediate HRs issues: The Company has provided comments regarding this subindicator, where it notes it has a Social Responsibility Policy and our Human Rights Guidelines as well as a Human Rights Commission which focuses on human rights set out in its strategic plan. It then discloses different actions taken such as training, grievance channels, disciplinary measures. At community level, it notes, it has local social responsibility plans, which include: community committees, reporting channels and training, among other actions. However, the subindicator looks for a description of its global system to prevent, mitigate or remediate its salient human rights issues detected during its assessment at its own operations It is not clear how the actions described are linked to the need of action plans for the issues determined as salient due to

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>the assessment process. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]</p> <ul style="list-style-type: none"> • Not Met: Describes how global system applies to EX BPs: The 2022 Human Rights and Corporate Citizenship Supplement notes: ‘Petrobras’ internal procedures provide for the establishment of a Commission for the Analysis and Application of Sanctions (CAASE) for cases of contractual non-compliance, such as: labor, social security or HSE non-compliance, contract abandonment, giving up the bidding process for no reason, non-compliance with the Ethical Conduct Guide for Suppliers, among other conduct considered severe’. However, the subindicator looks for a description of its global system to prevent, mitigate or remediate its salient human rights issues detected during its assessment at its business partners rather than actions to correct non-compliances. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] • Met: Example of actions decided on at least 1 salient HRs issue: The 2022 Human Rights and Corporate Citizenship Supplement explains actions taken in relation to Indigenous Peoples and Traditional Communities, including: ‘The relationship with Indigenous peoples and traditional communities takes place both through mandatory actions arising from environmental licensing conditions, such as the Project for the Characterization of Traditional Territories, as well as through voluntary actions such as corporate social responsibility projects and socio-environmental investments’. Also, ‘Through the Petrobras Socio-environmental Program, we support 34 socio-environmental initiatives whose purpose is to contribute to institutional strengthening and the autonomy of Indigenous peoples and traditional communities, which represents 34% of the project portfolio. In all, there are 18 Indigenous peoples, 44 Quilombola communities and 26 other traditional communities supported through conservation actions with sustainable use of natural resources, which consider ways of life, production systems and knowledge associated with socio-biodiversity’. As for Land Management and Resettlement, it notes: ‘A possible negative impact associated with our projects is the need to carry out resettlement processes. In order to manage and mitigate this impact, in March 2020, we established a corporate approach to resettlement. Covering all of our units, we have established guidelines for the removal and resettlement of individuals or communities affected by our developments and/or activities. [...] The guideline states that we must: avoid or reduce as much as possible the need for physical and/or economic displacement of individuals and communities; ii) when unavoidable, consider in the planning the estimation of the costs of expropriation and indemnification of improvements, as well as the costs of recomposition of the ways of life of impacted individuals and communities; and iii) treat the affected social segments equally, seeking actions that guarantee similar or better living conditions than the existing ones, as well as the maintenance of social and cultural relations. Indigenous peoples must be informed, in appropriate and accessible language, about projects that may occur on their land and given the opportunity to offer or withhold their consent to a project prior to its commencement. If the removal and resettlement of Indigenous or Quilombola communities is an absolute requirement, it will be necessary to carry out a prior, free, and informed consultation aimed at these communities’. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how stakeholders involved in decisions about actions taken: The Company has provided additional comments regarding this subindicator, explaining how it engages with different stakeholder and its grievance channels. However, this subindicator looks for a specific description of how it involves affected stakeholders in decisions about the actions to take in response to its salient human rights issues. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes system for evaluation effectiveness of actions: The 2022 Human Rights and Corporate Citizenship Supplement notes: ‘We monitor result indicators of our processes that allow us to evaluate our performance according to the most critical aspects of human rights. [...] The commission [human rights commission] is responsible for preparing, implementing, and monitoring the progress of Petrobras’ Human Rights Action Plan, ensuring the implementation of each of the commitments related to human rights foreseen in our strategic plan [...]. To monitor the implementation of the action plan, as well as other measures adopted to prevent and address social risks and repair impacts on human rights, the commission and its subcommittees meet monthly, sharing experiences and

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>challenges related to the implemented actions, evaluating the effectiveness of the adopted measures, and reflecting on other possibilities for action. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]</p> <ul style="list-style-type: none"> • Not Met: Example of lessons learned from evaluation effectiveness of actions: The report also indicates: 'ongoing work to implement an integrated human rights due diligence in the company indicated a number of paths for improvement that should guide our actions in the coming years, among which we highlight: Facilitate the full participation of stakeholders and rights holders in the processes of identifying and assessing critical human rights issues, as well as human rights risks and impacts; Establish feedback and diagnosis cycles to assess the management capacity of processes associated with human rights to define lessons learned and implement improvement measures; [...] Adopt a tool that supports the centralization of records of complaints and manifestations received by the company's different channels'. However, the subindicator looks for an example of the lessons learned while tracking the effectiveness of its actions on at least one of its salient human rights issues as a result of its due diligence process. Not clear how any action(s) mentioned are linked to a specific learning following the implementation of action plans for specific human rights impacts. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involves stakeholders in evaluation effectiveness of actions: The Company has provided comments regarding this subindicator, explaining how it engages with different stakeholders. However, this subindicator looks for a specific description of how it involves affected stakeholders in evaluation of whether the actions taken [in the context of a due diligence process, to address Human Rights risks and impacts] have been effective. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]
B.2.5	Communicating on human rights impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders: The Company has provided comments regarding this subindicator, explaining how it engages with different stakeholders, including online training for the workforce, a forum on diversity, meeting with communities, the programme ESG Journey for suppliers, and an award to promote suppliers' performance in different fields. However, although the Company provides examples of engagement with different stakeholders, this indicator looks for two examples demonstrating how it communicates with affected stakeholders regarding specific human rights impacts raised by them or on their behalf, in the first place. It focuses on how the Companies ensure meaningful information reaches affected stakeholders, how it responds, in communication terms, to issues raised by stakeholders and about their access to those communications. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes challenges to effective comms and how it is working to address them: The Company has provided comments to CHRB regarding this indicator. However, its content has not been found in publicly available sources.

C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all workers: Petrobras has a denouncement Channel. 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. The Company has provided additional comments regarding this subindicator, however, key information was already in use. [Sustainability report 2021, 2022: api.mziq.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Grievance mechanism available in appropriate languages and workers made aware: In Petrobras' website there is a "Petrobras Denouncement Channel", where it's possible to make a denouncement by telephone. There are phone numbers available in all countries that Petrobras has own operations and suppliers. The 2022 Human Rights and Corporate Citizenship Supplement notes: 'Our Code of Ethical Conduct contains a specific chapter on human rights. [...] We promote training, at least annually, for our managers and employees to disseminate and consolidate the principles and rules contained in the Code of Ethical Conduct and other topics related to ethics, integrity, and sustainability'. The Code contains provisions on the Whistleblower Channel. [Petrobras Denouncement Channel, N/A: contatoseguro.com.br] & [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] • Met: Describes how workers in EX BPs access grievance mechanism: The Ethical Conduct Guide for Suppliers states: 'Suppliers must, demanding a similar stance from its (sub)suppliers: report in the Petrobras Reporting Channel, in a timely, reasonable, responsible and honest manner any misconduct which they might find.' [Petrobras Ethical Conduct Guide for Suppliers, N/A: petrobras.com.br] • Met: Expects EX BPs to convey expectation to their BPs: The Ethical Conduct Guide for Suppliers states: 'Suppliers must, demanding a similar stance from its (sub)suppliers: [...] Report in the Petrobras Reporting Channel, in a timely, reasonable, responsible and honest manner any misconduct which they might find'. [Ethical conduct guide for suppliers, N/A: petrobras.com.br]
C.2	Grievance mechanism(s) for external individuals and communities	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all external individuals and communities: The company states that "With regard to claims and complaints from the communities present in the coverage area, the records are made via Customer Service and through the Ombudsman's Office (...) In order to ensure a more effective response to communities, we also have free phones with 24-hour service coverage, from Sunday to Sunday, which are widely publicized in the locations where we operate. In addition, our Social Responsibility teams provide specific telephone contact numbers and e-mail address for each operational unit to meet community demands". The Company has provided additional comments regarding this subindicator, however, key information was already in use. [Sustainability report 2021, 2022: api.mziq.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: The 2022 Human Rights and Corporate Citizenship Supplement notes: 'The General Ombudsman's Office is also responsible for managing the Complaints Channel [...]. Available in Portuguese, English and Spanish, 24-7, it can be accessed via the web-site or by telephone'. It adds: 'With regard to the communities present in the areas covered, we widely publicize our contact channels'. However, no further information found on how it publicises it. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] • Not Met: Describes how external individuals/communities access grievance mechanism: The 2022 Human Rights and Corporate Citizenship Supplement notes: 'Customer Service is available to provide any clarifications, an receive reports and complaints from communities through toll-free 24-7 helplines. Contact channels are widely publicized in the communities where we operate'. The Ethical Conduct Guide for Suppliers states: 'Suppliers must, demanding a similar stance from its (sub)suppliers: [...] report in the Petrobras Reporting Channel, in a timely, reasonable, responsible and honest manner any misconduct which they might find'. The Company has provided comments to CHRB regarding this indicator. However, its content has not been found in publicly available sources. It is not clear that external individuals and communities have access to it, in order to raise Complaints or concerns about human rights issues at the Company's business partners' (or to the Company's own mechanism to report in relation to business partners' behaviour). [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] & [Ethical conduct guide for suppliers, N/A: petrobras.com.br] • Not Met: Expects EX BPs to convey expectation to their BPs: See above. However, it is not clear the Company expects extractive business partners to convey expectations [to have a channel from which external individuals and communities can access to raise Complaints or concerns about human rights issues at the Company's suppliers] on access to grievance mechanism(s) to their suppliers. [Ethical conduct guide for suppliers, N/A: petrobras.com.br]

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.3	Users are involved in the design and performance of the mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes how users engaged on design and performance: The Company has provided comments to CHRB regarding this indicator. However, its content has not been found in publicly available sources. • Not Met: Provides user engagement examples (at least two) on design and performance <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes how users engaged on improvement of mechanism: The Company has provided comments to CHRB regarding this indicator. However, its content has not been found in publicly available sources. • Not Met: Provides user engagement examples (at least two) on improvement: The Company has provided comments regarding this subindicator. However, this subindicator looks for at least two examples of engagement with potential or actual users on the improvement of the grievance mechanism, no such evidence found. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]
C.4	Procedures related to the mechanism(s) are equitable, publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes procedure and timescales for managing complaints or concerns: The Company has provided comments to CHRB regarding this indicator. However, its content has not been found in publicly available sources. • Not Met: Describes technical, financial, advisory support to enable equal access: The Company has provided comments to CHRB regarding this indicator. However, its content has not been found in publicly available sources. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism: The Company has provided comments regarding this subindicator, where it discloses information on its Against Sexual Violence Program as well as on sanctions for individual and corporate entities and Operation Car Wash. However, this subindicator looks for an explanation of the type of outcome to the complainant through use of the grievance mechanisms. No further evidence found. [2022 Sustainability Report, 2023: api.mziq.com] • Not Met: Describes escalation to senior levels / independent adjudicators: The Company has provided comments regarding this subindicator, where it discloses information on its Against Sexual Violence Program as well as on sanctions for individual and corporate entities and Operation Car Wash. However, this subindicator looks for a description of how complaints or concerns for workers and all external individuals and communities may be escalated to more senior levels or independent third party adjudicators or mediators to challenge the process or outcome at the complainant's discretion. [2022 Sustainability Report, 2023: api.mziq.com]
C.5	Prohibition of retaliation for raising complaints or concerns	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation against workers/stakeholders: The company states: '(...) In addition to the various resources and procedures for preserving the whistleblower's identification, including those adopted by the company that operates the Reporting Channel, non-retaliation is foreseen as a specific topic to identify a situation in which the whistleblower feels harmed or retaliated against after reporting a complaint. The prohibition against retaliation is systemically and objectively contained in the Code of Ethical Conduct and in the "Protection for whistleblowers" guideline, managed by the Ombudsman's Office, in addition to other specific internal rules'. The Company has provided additional comments regarding this subindicator, however, key information was already in use. [Sustainability report 2021, 2022: api.mziq.com] • Met: Describes practical measures to prevent retaliation: The Denouncement Channel indicates: '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'. [Denouncement Channel_web, N/A: contatoseguro.com.br] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Specifies no legal action, firing or violence: Regarding its processes to repair and mitigate negative impacts in its workforce, the Company states: 'In 2022, the Reporting Person's Protection Guideline was implemented, which establishes rules for protection against disproportionate, harmful, or potentially harmful, abusive, or unfair treatment of people who report in good faith non-compliance related to the company's activities, or who have disclosed,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>unequivocally, the intention to do so. The protection also extends to any person who provides information or manages a complaint. Also, an educational video was posted on our internal social network (Workplace Petrobras), so that the workforce can learn more about the concept of retaliation, system of consequences and verification process'. However, no further evidence found explicitly indicating that it will not retaliate against workers and stakeholders through the specific ways required by this subindicator. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]</p> <ul style="list-style-type: none"> • Not Met: Expects EX BPs to prohibit retaliation against workers/stakeholders: The Company has provided comments regarding this subindicator, explaining how it publicises its Reporting Channel, measures to guarantee the safety of complainants and Whistleblower Protection Guideline. However, this subindicator looks for evidence that the Company expects its business partners to prohibit retaliation against workers and other stakeholders (including those that represent them) for raising human rights related concerns. No further evidence found. [2022 Sustainability Report, 2023: api.mzig.com]
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Complainants not asked to waive legal rights: The Company has provided comments to CHRB regarding this indicator. However, its content has not been found in publicly available sources. • Not Met: Does not require confidentiality provisions: The Company has provided comments to CHRB regarding this indicator. However, its content has not been found in publicly available sources. <p>Score 2</p> <ul style="list-style-type: none"> • Met: Example of issue resolved (if applicable): The 2022 Sustainability Report notes: 'Petrobras entered into a TAC with the ANP for the compensation of fines for non-compliance with the local content clause related to 35 concessions, located in the Barreirinhas, Camamu-Almada, Campos, Espírito Santo, Parecis, Parnaíba, Pernambuco-Paraíba, Pelotas, Potiguar, Recôncavo, Santos, Sergipe-Alagoas and Solimões basins. The TACs were established in accordance with ANP Resolution No. 848/2021 and provide for the conversion of local content fines from these concessions into new investment commitments in Exploration and Production in Brazil'. Also, 'The actions of the Personnel Plans are monitored by the Change Management Committee for Portfolio Management. This committee was instituted as part of the agreement entered into between Petrobras and the Public Labor Prosecution Office (MPT), ratified in the case file No. 0000673-48.2019.5.05.0006, on 12/17/2019, whose objective was to regulate the legal limits regarding the process of collective transfers of employees impacted by Petrobras' Active Portfolio Management. Among its attributions is to act as an advisory body on issues related to the management of change in units undergoing decommissioning, disinvestment, sale, hibernation, or leasing of assets, or in collective transfers of employees. The committee has equal composition, with half of its members representing the company and the other the employees. The Personnel Plan and the Integrated Journey from Change Management to Active Portfolio Management represent our commitment to our employees at all stages of the process'. [2022 Sustainability Report, 2023: api.mzig.com]
C.7	Remedying adverse impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes approach taken to remedy adverse HRs impacts: The Company states that 'since 2021, we have been managing a process to repossess the company's land in the municipality of Itaguaí/RJ. Part of this land, privately owned by the company, was invaded, and occupied on 05/01/2021 by a group of people led by a social movement. From the first day of the occupation, we sought repossession, always attentive to the fundamental rights of the people who were there. The court order for repossession was initially issued on 05/05/2021. Following the due legal procedure, several attempts were made at providing warnings and peaceful eviction. Since this route was not possible, on 07/01/2021, again by court decision, the area was vacated with the support of the Rio de Janeiro state police, Itaguaí municipal secretariats, the Public Defender's Office, and the Public Prosecutor's Office. On that occasion, those who so wished were sent to a temporary shelter organized by the municipal government. As part of our effort to seek the best possible solution, always attentive to people in situations of vulnerability, we systematically hold meetings with the State Department of Social Assistance and Human Rights, the Municipal Department of Social Assistance of the Municipality of Itaguaí, the Public Defender's Office of the State of Rio de Janeiro and the Public Prosecution Office of the State of Rio de Janeiro. Some people chose to remain in the shelter until 08/06/2021, when their definitive demobilization took

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>place, organized by the Municipality of Itaguaí-RJ and by the Public Defender's Office of RJ. During this period, we worked together with public bodies, with actions that reinforce our commitment to respecting human rights. These actions included the provision, paid for by the company, of alcohol gel and masks for sheltered people, transportation, mattresses, blankets, meals, storage of goods, drinking water, chemical toilet, personal hygiene items, periodic monitoring of the shelter by our teams of professionals, in addition to supplying basic food baskets, milk and diapers for children. After the work to register the sheltered people, it was found that the majority had a place of residence, which led to the alignment between the Public Prosecutor's Office of Rio de Janeiro, Public Defender's Office of Rio de Janeiro, the Municipality of Itaguaí and Petrobras to replace the provisional shelter with a food card for six months to those sheltered, in monthly deposits per family, in addition to the initial amount of BRL 500.00 (five hundred reais) on the food card upon delivery. Goods collected on the day of reintegration and being kept in a warehouse paid for by the company were also returned. The proposal was submitted to the sheltered, who agreed with its terms and formalized their agreement in the records through the Public Defender's Office. A decision was then issued authorizing the replacement of the measure and the return of the deposited assets. The shelter was demobilized, and people showed up on the date and time set to receive the card, respecting health protocols due to the pandemic'. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes changes to systems, processes and practices to prevent future impacts: The Company has provided comments regarding this subindicator, on its Corporate Action Plan to Improve Accessibility carried out by a multidisciplinary team and employees with disabilities and the different actions this plan promotes. However, the subindicator looks for a description of changes to systems, processes and practices to prevent similar adverse impacts [adverse human rights impacts which it has caused or to which it has contributed] in the future. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] • Not Met: Describes approach to monitoring/implementing agreed remedy • Not Met: Describes approach to learning from incidents if no adverse impacts identified
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Discloses number of grievances filed, addressed or resolved and outcomes achieved: The 2021 Sustainability Report states: 'In 2021, our Ombudsman staff received 130 complaints from local communities. Of this total, 27 were accusations (8 confirmed, 15 unconfirmed, 2 closed and 2 that are still being processed), 53 were complaints (38 completed, 14 closed and 1 that is still being processed), 45 were requests (27 completed, 17 closed and 1 that is still ongoing), in addition to 4 completed suggestions and a compliment (...). Our Board of Directors became aware of the list of complaints received, and our Statutory Audit Committee obtained detailed information on 113 compliance incident complaints'. Regarding its grievances filed by its workforce, the 2022 Human Rights and Corporate Citizenship Supplement notes: 'In 2022, we received 1,094 complaints from the internal audience, including service providers, 632 of which were about behavioral issues, 130 of which related to discrimination, moral harassment, sexual harassment, sexual misconduct and rape or attempted rape. In 88 of these complaints, due to insufficient information, lack of authorization from the complainant or the victim for taking action or moreover due to the non-recognition of the facts reported by the potential victims, the complaint was closed without investigation. [...] Of the 42 complaints investigated, 7 were concluded in the same year, 3 of which were confirmed. In 2022, complaints opened in previous years were also investigated. As a result, the total number of complaints investigated in the year was 15, of which 5 were confirmed (2 from the previous year). On December 31, we had 36 complaints under investigation, 35 of which opened in 2022. In the accountability stage, two disciplinary measures were applied by means of a warning, two educational measures were applied by means of a term of commitment and one service provider had their contract with Petrobras terminated'. As for its communities: 'In 2022, our General Ombudsman received 397 manifestations from local communities. Of this total, 58 were reports (12 confirmed, 20 unconfirmed, 14 archived and 12 pending); 166 were complaints (116 completed, 49 archived and 1 pending); 146 were requests (112 completed, 33 archived and 1 in progress); in addition to 27 suggestions, opinions, and compliments. The reports included mainly those related to invasion or irregular

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>occupation of Petrobras areas; impact on the health of the community surrounding the facilities; environmental impacts and irregularities in the conduction of projects maintained by the company'. [Sustainability report 2021, 2022: api.mzig.com] & [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]</p> <ul style="list-style-type: none"> • Met: Example of how lessons from mechanism improved HRs management system: The 2022 Human Rights and Corporate Citizenship Supplement notes: 'In 2022, we analyzed complaints arising from contracts with suppliers to identify sensitive issues to the protection of human rights and designed a matrix involving several company managements to monitor and propose actions related to labor irregularities in the supply chain. This matrix will allow us to act preventively and immediately remedy identified irregularities'. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes process to evaluate mechanism and changes made as a result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders: The Company has provided comments to CHRB regarding this indicator. However, its content has not been found in publicly available sources.

D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Pays living wage or sets time-bound target: The 2022 Human Rights and Corporate Citizenship Supplement notes: 'At Petrobras parent company, our compensation is defined through a compensation policy approved by the Board of Directors and represents an instrument for attracting, engaging, and retaining talent, in accordance with public selection processes for hiring employees and current legislation, being competitive within our industry and aligned with our performance culture. As a result, we compensate our employees fairly, with a package that involves competitive salaries and benefits compared to companies operating in the same market'. However, it is not clear the Company has a time bound target for paying all workers a living wage or that it pays all workers a living wage. A living wage should include basic needs plus some discretionary for employees and his/her family and/or depends. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] • Not Met: Describes how living wage determined: See above. The 2022 Human Rights and Corporate Citizenship Supplement adds: 'Our positions and emphases are classified based on the score resulting from the position evaluation process, conducted by a specialized consultancy firm and independent from management, correlated to the result of the compensation survey, which has demonstrated that our salaries are competitive in relation to the best market practices of oil and gas in Brazil, since 2007. The salaries paid, without any distinctions regarding gender or ethnicity, are discussed during collective negotiations with the union entities that represent the category'. Although the Company indicates salaries are discussed during collective negotiations, it is not clear the factors by which it determines a living wage for the regions where it operates. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Achieved paying living wage: See above. It adds: 'In addition to direct compensation, we offer different benefits to our employees, for example, meal vouchers, education allowance, health insurance and supplementary pension plan. [...] Salary values are paid monthly and without distinction. [...] Thus, the compensation package offered by the company has been very competitive over the years, which has contributed to the low turnover (1.93 in 2022) and the large number of candidates enrolled in our public selection process (more than 160,000 candidates in the 2021 process)'. However, as indicated above, it is not clear it pays a living salary which takes into account basic needs plus some discretionary for employees and his/her family and/or depends. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Reviews definition living wage with unions: The 2022 Human Rights and Corporate Citizenship Supplement notes: 'Our positions and emphases are classified based on the score resulting from the position evaluation process, conducted by a specialized consultancy firm and independent from management, correlated to the result of the compensation survey, which has demonstrated that our salaries are competitive in relation to the best market practices of oil and gas in Brazil, since 2007. The salaries paid, without any distinctions regarding gender or ethnicity, are discussed during collective negotiations with the union entities that represent the category. Salary values are paid monthly and without distinction'. The Company has provided comments to CHRB regarding this indicator. However, its content has not been found in publicly available sources. The subindicator looks for evidence that it regularly reviews its definition of the living wage including with relevant trade unions (or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law). No further evidence found. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Member of EITI • Met: Reports of taxes and revenues beyond legal minimums: The 2022 Sustainability Report notes: 'In 2022, Petrobras reached a record annual tax contribution, collecting a total of BRL 279 billion in the form of taxes and Government Holdings (PGOV) in Brazil and USD 134 million paid abroad. The collection of taxes and PGOV considerably increases the municipal, state and federal investment capacity, expanding the possibility of greater investment in urban infrastructure and services to serve the population'. The Company discloses graphics on taxes by government for the municipal, state and federal spheres and of royalties. It adds: '[it] had activities in six countries, in addition to Brazil. In Latin America, our operations are exploration and production in Argentina, Bolivia, and Colombia, [...] In North America we produce oil and gas through a joint venture. We have subsidiaries in The Netherlands (Rotterdam), USA (Houston) and Singapore that support our commercial and financial activities'. [2022 Sustainability Report, 2023: api.mziq.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Reports taxes and revenue by country: The 2022 Sustainability Report notes: 'In 2022, Petrobras reached a record annual tax contribution, collecting a total of BRL 279 billion in the form of taxes and Government Holdings (PGOV) in Brazil and USD 134 million paid abroad. The collection of taxes and PGOV considerably increases the municipal, state and federal investment capacity, expanding the possibility of greater investment in urban infrastructure and services to serve the population'. The Company discloses graphics on taxes by government for the municipal, state and federal spheres and of royalties. It adds: '[it] had activities in six countries, in addition to Brazil. In Latin America, our operations are exploration and production in Argentina, Bolivia, and Colombia, [...] In North America we produce oil and gas through a joint venture. We have subsidiaries in The Netherlands (Rotterdam), USA (Houston) and Singapore that support our commercial and financial activities'. It discloses income tax paid to all these countries but Bolivia. [2022 Sustainability Report, 2023: api.mziq.com] • Not Met: Steps taken to promote transparency in non EITI countries • Not Met: Provides example of contracts for terms of exploitation for countries without disclosure requirements
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Measures to prohibit violence/retaliation against workers for joining trade union: See below. High union recognition, in this case 96%, is taken as a proxy for not intimidating or retaliating. More than 95% of the workforce is covered by CB. [2022 Sustainability Report, 2023: api.mziq.com] • Met: Discloses % of total direct operations covered by CB agreements: The 2022 Sustainability Report notes: 'All Petrobras Parent Company employees are represented by independent unions, and 42% are union members. We have a Collective Bargaining Agreement in force with all unions representing employees, with 96% of our own workforce covered by a Collective Bargaining Agreement and 4% by an Individual Labor Agreement (AIT), which has the same benefits as the Collective Bargaining Agreement. As provided by art. 457 of the Consolidation of Labor Laws (CLT), these agreements include social clauses related to work, security conditions and benefits'. [2022 Sustainability Report, 2023: api.mziq.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets both requirements under score 1: See above.

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.4	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own extractive operations, which includes JVs)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes process to identify H&S risks and impacts: The company states: "Our occupational health management system was implemented and aims at protecting the health of our employees, through measures aimed at promoting, preventing and preserving physical, mental and social well-being, aiming at quality of life and productivity. As a basis for its execution, it considers the Regulatory Norms (NRs) provided for in Ordinance No. 3,214, of the Ministry of Labor and Social Security, including in these norms the Environmental Risk Prevention Program (PPRA), the Occupational Health Medical Control Program (PCMSO), the resolutions of the councils of health professionals, guidelines from the Health and Epidemiological Surveillance, the General Data Protection Law and other legislation in force, such as social security legislation. The management system also has the Ergonomics and Human Factors Program". The Company has provided additional comments regarding this subindicator, however, key information was already in use. [Sustainability report 2021, 2022: api.mziq.com] • Met: Discloses injury rate or lost days for last reporting period: The 2022 Sustainability Report notes: 'Of that total number of accidents with leave, 35 were employees and 131 were contractors, making up a Lost Time Injury Frequency Rate (LTIF) of 0.39 and 0.48, respectively'. [2022 Sustainability Report, 2023: api.mziq.com] • Met: Discloses fatalities for last reporting period: The 2022 Sustainability Report notes: 'In 2022, there were five fatal accidents, all involving employees of contracted companies, in the execution of contracts with Petrobras'. [2022 Sustainability Report, 2023: api.mziq.com] • Met: Discloses occupational disease rate for last reporting period: The 2022 Sustainability Report notes: 'The company monitors the incidence of occupational diseases through its Petrobras TIDO indicator (Petrobras Occupational Disease Incidence Rate), which since 2019 has been zero'. [2022 Sustainability Report, 2023: api.mziq.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Set targets for H&S performance: The 2022 Sustainability Report notes: 'we work constantly to continue as a global safety benchmark in the sector, pursuing a Total Recordable Injuries below 0.7 and a zero fatality rate'. The Company reports that Occupational Disease Incidence rate has been zero since 2019. [2022 Sustainability Report, 2023: api.mziq.com] • Met: Met targets or explains why not or actions to improve H&S management systems: The 2022 Sustainability Report notes: 'We had 40 recordable injured employees and 204 recordable injured contractors, generating a TRI of 0.45 and 0.75, respectively. Of that total number of accidents with leave, 35 were employees and 131 were contractors, making up a Lost Time Injury Frequency Rate (LTIF) of 0.39 and 0.48, respectively [below the target 0.7]. In 2022, there were five fatal accidents [...] All accidents were analyzed, and a multidisciplinary team identified the underlying causes and established blocking actions to prevent further incidents. Lessons learned were implemented in all units and contributed to the advancement of preventive measures in our management system'. It adds: 'Aiming at the continuous improvement of our HSE management system, specific structuring programs and initiatives are developed, such as the Commitment to Life Program, the Golden Rules, and the Fundamentals of Process Safety. Since the launch of the first Commitment to Life Program in 2016, we had a significant reduction in the Total Recordable Injuries (TRI) from 2.15 to 0.68. [...] The Program promotes increased awareness among employees about caring for life, through training and qualification of teams and structuring actions. In order to support a culture of safety, in 2016, ten Golden Rules of safety were defined based on the most recurrent accidents in the oil and gas industry and in our history. Training in the Golden Rules, mandatory for all our employees in Brazil and abroad, is one of the actions provided for in the Commitment to Life Program'. [2022 Sustainability Report, 2023: api.mziq.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.5	Indigenous peoples' rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Process to identify/recognise indigenous rights holders: The 2021 Sustainability Report states: 'In our local Social Responsibility and Community Relations plans, we prioritize peoples and communities known as traditional such as fishermen, caçaras, quilombolas, Indigenous, coastal communities and terreiro peoples. The identification of traditional communities and peoples covered in this section considers the legally established concepts. This scope was anchored in the identification established in Decree 6040/2007, which institutes the National Policy for the Sustainable Development of Traditional Peoples and Communities. The communities prioritized in Brazil are shown in the following figure'. The Company has provided additional comments regarding this subindicator, however, key information was already in use. [Sustainability report 2021, 2022: api.mziq.com] • Met: Describes how indigenous communities are engaged during assessment: The 2021 Sustainability Report states: 'Indigenous peoples must be informed, in appropriate and accessible language, about projects that may occur on their land and have the opportunity to give or deny consent to a project before it starts. If the removal and resettlement of Indigenous or quilombola communities is absolutely essential, it will be necessary to first carry out a free and informed consultation directed at these communities'. The 2022 Human Rights and Corporate Citizenship Supplement adds: 'The relationship with Indigenous peoples and traditional communities takes place both through mandatory actions arising from environmental licensing conditions, such as the Project for the Characterization of Traditional Territories, as well as through voluntary actions such as corporate social responsibility projects and socio-environmental investments. [...] Additionally, we carry out voluntary socio-environmental investments that develop specific actions focused on recording and valuing Indigenous culture and traditional communities, based on strengthening the role of these populations'. [Sustainability report 2021, 2022: api.mziq.com] & [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commitment to FPIC: See above. The Company has provided additional comments regarding this subindicator, however, key information was already in use. • Not Met: Recent example of obtaining FPIC or not pursuing indigenous people's land/resources: The 2022 Human Rights and Corporate Citizenship Supplement notes: 'It should also be mentioned that the Public Prosecutor's Office opened an investigation procedure in relation to the guarantee of the right to prior, free, and informed consultation of the Indigenous populations of Amapá for carrying out the exploration project for Block FZA-M-59 [...]. The procedure originated on behalf of the Indigenous Research and Training Institute (IEPÉ), claiming that the right to prior, free, informed, and good-faith consultation of the Indigenous populations of Oiapoque regarding the exploratory project was not respected. According to the civil society organization, it would be mandatory to hear the Indigenous populations through the use of the "Protocol of Consultation of the Indigenous Peoples of Oiapoque," prepared by the IEPÉ institute itself, for the validity of the environmental licensing process of the activity. We present a written response in the MPF procedure, highlighting the initiatives adopted to meet the right of prior information to the Indigenous populations of Oiapoque regarding the project, in addition to holding a meeting with the MPF in order to present such initiatives personally and clarify all doubts. We are also willing to hold a specific meeting with the Council of Chief of the Indigenous Peoples of Oiapoque (CCPIO) in order to provide prior information to these populations regarding the exploration project'. However, it is not clear the Company actually obtained the FPIC (including consent). This subindicator looks for the most recent example where it has obtained free prior and informed consent (FPIC) or where it decided not to pursue the land or resources impacting on indigenous peoples. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.6	Land rights: Land acquisition (in own extractive operations, which includes JVs)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes approach to identifying land tenure rights holders and negotiating compensation: The 2022 Human Rights and Corporate Citizenship Supplement notes: 'In order to manage and mitigate this impact, in March 2020, we established a corporate approach to resettlement. Covering all of our units, we have established guidelines for the removal and resettlement of individuals or communities affected by our developments and/or activities. [...] The guideline states that we must: avoid or reduce as much as possible the need for physical and/or economic displacement of individuals and communities; when unavoidable, consider in the planning the estimation of the costs of ex-appropriation and indemnification of improvements, as well as the costs of recomposition of the ways of life of impacted individuals and communities; and treat the affected social segments equally, seeking actions that guarantee similar or better living conditions than the existing ones, as well as the maintenance of social and cultural relations. Indigenous peoples must be informed, in appropriate and accessible language, about projects that may occur on their land and given the opportunity to offer or withhold their consent to a project prior to its commencement. If the removal and resettlement of Indigenous or Quilombola communities is an absolute requirement, it will be necessary to carry out a prior, free, and informed consultation aimed at these communities. In 2022, there were no resettlements caused by our activities in any type of community'. The Guidelines for the Removal and Resettlement of Communities adds: 'Stakeholder consultation and participation should be organized and repetitive. The views of affected people and communities on issues that affect them should be considered directly through reporting in decision-making processes. [...] Affected stakeholders should be involved before, during, and after removal or resettlement, identifying successes, problems, and lessons learned'. However, it is not clear how it identifies legitimate tenure rights holders, including through engagement with the affected or potentially affected communities in the process, with particular attention to vulnerable or marginalised tenure rights holders and how it negotiates with them to provide adequate compensation or requested alternatives to financial compensation. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] & [Guidelines for the Removal and Resettlement of Communities, N/A: api.mziq.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes approach to compensation including valuation: See above. The Guidelines for Removal and Resettlement of Communities indicates: 'The involuntary removal of communities is authorized after the publication of an expropriating decree in the official gazette, which states the public utility of the enterprise and authorizes the expropriation or right of way. In this case, expropriation may occur in a friendly manner and outside the courts, a situation in which the business and the individual enter into consensus regarding the amount of the compensation. If there is no agreement as to the compensation amount, the conflict will be resolved in court, through an expropriation or right of way action. Fair compensation should result in living conditions and livelihoods similar to pre-existing ones. Since livelihoods often depend on a complex interconnection of assets, such as access to land and other natural resources, social networks, and access to employment and capital, compensation must consider restoring livelihoods or the social well-being displaced persons. Therefore, careful planning must be undertaken to ensure that, where removal or resettlement is inevitable, livelihoods are restored and communities maintain social and cultural integrity and continuity'. [Guidelines for the Removal and Resettlement of Communities, N/A: api.mziq.com] • Not Met: Describes steps to meet IFC PS 5 in state deals

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.7	Security (in own extractive operations, which includes JVs)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes security implementation (incl. VPs or ICOC) and provides an example: The Company indicates that 'The Corporate Security Risk Management methodology includes the analysis of the interaction between the internal and external environments of our units, in order to identify threats that could compromise the security of people, facilities and the company's business. For the external scenario, we use intelligence analysis materialized in an opinion generated by our Security Monitoring and Analysis area, which covers, among other issues, crime rates, statistics, and the main crimes, seeking to anticipate and prevent possible conflict situations. Thus, it is possible to develop corporate security actions and procedures with a focus on preventing and responding to the risks of intentional acts that are reflected in the Local Asset Security Plan (PLSP). Corporate Security, in the preparation of its studies and other products, complies with the legislation and regulations related to human rights; always recommending to the unit manager, in situations that require interaction with a community, the involvement of representatives from the Social Responsibility area. Also, technological resources can contribute to the planning of responses in cases of conflict, promoting more responsible actions. As an example, we use drones used in large areas, such as refineries and onshore production fields, and the Mobile Security Units (UMS), used in production stops or in the eventual monitoring of remote locations'. However, it is not clear how it includes the implementation of its commitment to the Voluntary Principles on Security and Human Rights or the International Code of Conduct for Private Security Providers. Moreover, it is expected to provide an example of how it ensures respect for human rights (including the human rights of people in local communities) in the course of maintaining the security of company-managed operations, including when working with contracted private or public security providers, if applicable. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] • Not Met: Ensures Business Partners/JVs follow security approach: The Ethical Conduct Guide for Suppliers states: 'The suppliers, demanding a similar stance from its (sub)suppliers, commit to: [...] Not performing acts that characterize excessive force in interactions between security personnel, communities and workers'. The 2022 Human Rights and Corporate Citizenship Supplement indicates that 'In relation to our partners, risks related to Health, Safety and Environment (HSE) and Social Responsibility (SR) in Joint Ventures (JV) are reflected in clauses of their Joint Operating Agreements (JOA) and other agreements. In all contracting processes, we provide HSE and SR guidelines applicable to our suppliers, who must: "Respect internationally recognized human rights as set out in the International Bill of Human Rights, the International Labor Organization Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights ("Guiding Principles") and Decree n. 9571 of November 21, 2018 and other applicable legislation". However, it is not clear how the Company ensures its business partners, including joint ventures, implement an equivalent approach to security management [including implementing its commitment to the Voluntary Principles on Security and Human Rights or the International Code of Conduct for Private Security Providers] that ensures respect for human rights. [Ethical conduct guide for suppliers, N/A: petrobras.com.br] & [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Security and HRs assessment includes input from local communities • Not Met: Two examples of working with local communities to improve security

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes preventative/corrective action plans for water and sanitation risks: The 2022 Sustainability Report explains its challenge: ‘Reduce the volume of freshwater withdraw from water bodies, in a region [Duque de Caxias Refinery] of high use of the resource, contributing to the continuity of supply for the populations and stakeholders and to the maintenance of ecosystems’. It also presents its solutions: ‘Replace the withdrawal of “new fresh water” for industrial purposes with reused water’. It also presents the results obtained. It adds: ‘all of our new development projects undergo several review rounds where environmental criteria are evaluated, such as water use; generation, treatment and disposal of effluents; possible impacts on water sources; and mitigation, prevention and potential compensation measures. For the continuity of our operations, as well as for society and stakeholders, it is extremely important that we manage the risks of water scarcity. We assess such risks using different tools [...]. Any environmental impacts that may occur to water bodies due to our activities will receive the resources and efforts for maximum damage mitigation, and if necessary, in conjunction with the public authorities. As an example of our readiness to minimize impacts, we can mention the existence of our Environmental Defense Centers (CDAs), which are ready to act in case of spills of oil, oil products or chemicals in bodies of water’. In addition: ‘we invested approximately BRL 21 million in research and development projects related to the management of water resources and effluents, through internal research and in partnership with universities and technological institutes. The research lines sought to optimize our effluent treatment processes, including produced water, bringing greater reliability and efficiency, in addition to enabling the advancement of reuse in our onshore facilities, and the reinjection of produced water in offshore units. In 2022, we completed studies to assess current and future water availability, as well as the identification of alternative withdrawal sources, in 16 hydrographic basins from which 26 of our facilities withdraw or receive water. Priority was given to areas with greater risk of stress or water scarcity, to contribute to the mitigation of these risks. We also updated our Sustainability Commitment on water security to a 40%1 reduction in our freshwater withdrawals by 2030’. [2022 Sustainability Report, 2023: api.mziq.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Sets targets on water stewardship that consider water use by local communities: The 2022 Sustainability Report notes: ‘We also updated our Sustainability Commitment on water security to a 40% reduction in our freshwater withdrawals by 2030. [...] In order to reach the commitment, we considered the divestments foreseen in the company's portfolio management, as well as a dynamic portfolio of actions and projects developed for this purpose, currently composed of around 40 actions and projects. These actions focus on reuse, along with measures to reduce water losses or adopt alternative water sources’. However, it is not clear how these targets on water stewardship that take into consideration water use by local communities and other users in the vicinity of its operations. The Company provides further comments for requirements for new undertakings. No further evidence found. [2022 Sustainability Report, 2023: api.mziq.com] • Not Met: Reports progress in meeting targets and trends demonstrating progress: See above. It adds: ‘So far, 21 portfolio actions have been implemented, representing a potential reduction in freshwater withdrawal of up to approximately 5,900 megaliters (5.9 million m³), depending on the operating conditions of the facilities involved, such as greater or lesser dispatch of thermoelectric plants, or volume of oil load processed in refineries. This volume of fresh water represents approximately 4% of the 2021 collection, the base year of the commitment’. However, as indicated above, it is not clear to what extent do these targets take into consideration water use by local communities and other users in the vicinity of its operations. [2022 Sustainability Report, 2023: api.mziq.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.9	Women's rights (in own extractive operations, which include JVs)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes processes to stop harassment and violence against women: The Company states that 'We are improving our procedures for preventing, receiving, and handling reports of sexual violence in the workplace, especially against women. The changes, such as the reduction in the deadline for completing the investigation, aim to prevent the occurrence of cases and provide more agility and reliability to the investigation of complaints, making the enforcement of consequences more effective in confirmed cases. We will also provide a 24-hour psychological assistance service to welcome and provide guidance on the reporting channel. The measures are part of the package of actions suggested by the working group set up in April 2023 to improve the process for receiving and handling complaints of sexual misconduct and harassment. The group's recommendations include immediate, medium and long-term actions and are part of the Program to Combat Sexual Violence, approved by our Executive Board. [...] the Program to Combat Sexual Violence, launched in April 2023, will reinforce trainings and expand the dissemination of clarifications and guidance to complainants'. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] • Not Met: Working conditions take into account gender issues: It also indicates that 'Our commitment to early childhood shows in supporting active parenting, through support for pregnancy, offering a pregnant women and future parent program, available for pregnant employees and their partners, as well as for employees who will be parents soon along with their pregnant companions. Also, we provide breastfeeding rooms in 21 locations, so that women have the possibility of extending the breastfeeding period, considering the benefits of this action for the family'. However, it is not clear how it takes into consideration differential impacts on women and men of working conditions, including risks to reproductive health. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] • Not Met: Measures and steps to address gender pay gap at all levels of employment: The Sustainability report indicates that 'In accordance with Guideline 7 of our Human Resources Policy and with item 4.2.a of our Code of Ethical Conduct, our Career and Compensation Plan (PCR) makes no gender distinction regarding the compensation between men and women who occupy the same position or function. Thus, considering the same position, salary level, time with the company, regime and working conditions, the ratio of the average compensation between women and men is equal to 1. However, when we analyze it broadly, it is clear that the special work regimes, which have specific additional compensation, impact the average ratio between the compensation of women and men, indicating a small difference. It should also be clarified that there is a male predominance in activities associated with these regimes in the oil and gas industry. Despite this, also from this perspective, we are managing to reduce the difference. In 2022, the ratio between the compensation of women and men at Petrobras was 0.97'. However, it is not clear the steps it takes to address any gender pay gap throughout all levels of employment. Moreover, no further information found on how it measures it. [2022 Sustainability Report, 2023: api.mziq.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Provides analysis of trends demonstrating closing gender pay gap: The 2022 Sustainability Report notes: 'considering the same position, salary level, time with the company, regime and working conditions, the ratio of the average compensation between women and men is equal to 1. However, when we analyze it broadly, it is clear that the special work regimes, which have specific additional compensation, impact the average ratio between the compensation of women and men, indicating a small difference. It should also be clarified that there is a male predominance in activities associated with these regimes in the oil and gas industry. Despite this, also from this perspective, we are managing to reduce the difference. In 2022, the ratio between the compensation of women and men at Petrobras was 0.97'. Also, 'We have specific goals for the participation of women in the Petrobras Parent Company. In 2022, we ended the year with women representing 17% of our employees. In managerial positions, which include coordination, sector manager, managers, general manager, assistant, executive manager, and executive board (CEO and officers), women represent 19.9% and in supervisory roles were 10.9%. Considering the managerial and supervisory roles together, women represent 17%. In revenue-generating departments, where we have the majority of employees in STEM positions (82%), women in managerial roles represent 14.5% of managerial roles (an increase of 1.5% compared to the previous year)'. However, this subindicator looks for an analysis of trends demonstrating progress on closing any gender pay gap. [2022 Sustainability Report, 2023: api.mziq.com]

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Area: Security of persons • Headline: Reintegration of possession of Petrobras land is marked by one death, injured, gender discrimination and arrest of community leader • Story: The repossession operation of a Petrobras land in the municipality of Itaguaí, in the Metropolitan Region of Rio de Janeiro, where around 4,000 families were displaced since May 1st, was marked by conflict between the police and the families. The Civil Chamber Judge Alexandre Scisínio had overruled the repossession order, granting the settlers the right to remain on the land until the Public Defence Office issued an opinion at the end of 2021. The police released tear gas and fired water from an armoured truck to disperse the occupants, destroying the inhabitants' belongings. During the conflict, an elderly woman died, at least two children and a pregnant woman were seriously injured, members of the LGBTQIA+ community were verbally abused and Erick Vermelho, the leader of the movement, was arrested. The occupation, called "May 1st Refugee Camp", had become a lifeline for the people who lost their income and had been evicted from their homes amid Brazil's uncontrolled Covid-19 crisis. They had already set up their own cistern, a recycling plan and a communal kitchen. We invited Petrobras to comment on what happened, but the company did not do so. [Brasil de Fato, 01/07/2021, "RJ: in Itaguaí, repossession on Petrobras land is marked by confrontation": brasildefato.com.br] [Business & Human Rights Resource Centre, 09/07/2021, "Brazil: During repossession of Petrobras, an elderly woman dies, children and pregnant woman are injured and LGBTQIA+ people suffer discrimination": business-humanrights.org] [Vice, 09/07/2021, "Brazil Tear-Gassed Poor People on Land an Oil Company Wasn't Even Using": vice.com] [AlJazeera, 08/07/2021, "Nowhere to go: Brazil's COVID 'refugees' struggle after eviction": aljazeera.com]
E(1).1	The company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Public response: The report asked Petrobras to take a position on the repossession. In a note, the company's advisory said that "on this date, the repossession order issued by the 2nd Civil Court of Itaguaí, as previously authorized by the President of the Superior Court of Justice (STJ), with the support of the Social Welfare Department of the Municipality of Itaguaí, the Department of Social Development and Human Rights of the State of Rio de Janeiro and the Military Police, in order to ensure the safe and peaceful eviction from the property on Rua Deputado Octávio Luis Cabral, Itaguaí. About the situation of the families living there, the advisory said that "for the implementation of that court order, Petrobras provided kits with alcohol gel and mask, offered transportation to three bus stations near the city of Itaguaí, in addition to storage service and safekeeping of goods in a warehouse hired by the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Company itself. Food, mattresses and blankets were also provided to meet the people who will stay temporarily in shelters provided by the City Hall".</p> <p>Petrobras provided a response to the BHRRC on the violent repossession of land in Itaguaí. One part of the response reads: "The court decision notwithstanding, company employees have been providing support and on-site assistance to the Social Assistance Secretary of the Itaguaí Municipality in several new emergency service issues that arise all the time, such as:</p> <ul style="list-style-type: none"> - Supply of several personal hygiene items (e.g. toothpaste, pads, diapers, toilet paper and others), cleaning materials, gallons of drinkable mineral water and powdered milk for more 600 people daily; - Inspection of the shelter's facilities; - Installation of six chemical toilets in the temporary shelter" [Brasil de Fato, 01/07/2021: brasildefato.com.br] [Business & Human Rights Resource Centre, 21/07/2021, "Petrobras response about violent repossession of land in Itaguaí": business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: The Company states that 'The court order for repossession was initially issued on 05/05/2021. Following the due legal procedure, several attempts were made at providing warnings and peaceful eviction. Since this route was not possible, on 07/01/2021, again by court decision, the area was vacated with the support of the Rio de Janeiro state police, Itaguaí municipal secretariats, the Public Defender's Office, and the Public Prosecutor's Office. On that occasion, those who so wished were sent to a temporary shelter organized by the municipal government. [...] Some people chose to remain in the shelter until 08/06/2021, when their definitive demobilization took place, organized by the Municipality of Itaguaí-RJ and by the Public Defender's Office of RJ. During this period, we worked together with public bodies, with actions that reinforce our commitment to respecting human right.' however, the Company does not address the alleged violence and discrimination. It also does not address the alleged death of a person during the repossession. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]
E(1).2	The company has investigated and taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders: In its response to the BHRRC, the company states "As part of our efforts to find the best possible solution, we are systematically holding meetings with the State Secretary of Social Assistance and Human Rights, the Municipal Secretary of Social Assistance of the Municipality of Itaguaí, the Public Defender's Office of the State of Rio de Janeiro, and the Public Prosecutor's Office of the State of Rio de Janeiro. On August 27, 2021, at our request, the judge in charge of the case called a Special Hearing with all the parties involved in order to find solutions to the situation." However, it is unclear whether these actors can be considered legitimate representatives of displaced persons. <p>The Company provided feedback for this indicator. However, it was not material for the assessment. [Business & Human Rights Resource Centre, 21/07/2021: business-humanrights.org] [YAC, 09/07/2021, "Brazil Evicts Hundreds Of Families Amid The COVID Pandemic On Behalf Of Petrobras": yac.news] [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]</p> <ul style="list-style-type: none"> • Not Met: Identified cause: The company does not present investigative results on the underlying causes of the events concerned. Furthermore, the Company provided feedback for this indicator. However, it was not material for the assessment. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: There is no evidence that the company made changes to its management systems following the events and their human rights impacts. Furthermore, the Company provided feedback for this indicator. However, it was not material for the assessment as it referred to the company's general approach to property security but was not linked to the alleged events. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br] • Not Met: Stakeholder input to steps taken
E(1).3	The company has engaged with affected stakeholders to provide for or	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provided remedy: The company indicates: 'After the registration of those sheltered, there was an alignment between the Public Ministry of Rio de Janeiro, Public Defender's Office of Rio de Janeiro, Municipality of Itaguaí and Petrobras in the sense of replacing the temporary shelter with a food aid (via card)

Indicator Code	Indicator name	Score (out of 2)	Explanation
	cooperate in remedy(ies)		<p>for six months to the sheltered, in monthly deposits per family monthly, in addition to the initial amount of BRL 500.00 (five hundred reais) on the food card upon delivery . Goods collected on the day of reintegration, which were in a warehouse paid for by the company, were also returned. The aforementioned proposal was submitted to the sheltered, who agreed with its terms and formalized their consent in the case file through the Public Defender's Office. A decision was then issued authorizing the replacement of the measure and the return of the deposited assets. The shelter was demobilized and people attended the date and time set to receive the card, respecting the health protocols at the time due to the pandemic'. However, no evidence was found of remediation for the injury and discrimination allegedly sustained during the repossession. No evidence was found of remediation being provided for the person's alleged death during the repossession. [2022 Human Rights and Corporate Citizenship Supplement, 2022: petrobras.com.br]</p> <ul style="list-style-type: none"> • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders: See above. • Not Met: Remedy delivered: See above. • Not Met: Independent remedy process used
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Area: Health & Safety • Headline: Petrobras refinery workers go on strike for protection against Covid-19 • Story: Workers at a refinery owned by Brazilian state-run oil company Petrobras went on strike Monday, demanding more protection against a surge of Covid-19. The Minas Gerais state oil workers' union said the indefinite strike at the Gabriel Passos Refinery was "to defend workers' lives and rights," accusing the company of a "disregard for safety measures to contain infections"...The union blamed the outbreak partly on "excessively crowded conditions," which it said in a statement were caused by Petrobras bringing in outside employees to do maintenance work at the refinery. Petrobras is using more than 2,000 temporary employees for the project, nearly doubling the refinery's workforce, said news site UOL. Brazilian media reports said the refinery had more than 100 cases of Covid-19 last week, including 11 that required hospitalization. A Petrobras spokesman told AFP the company could not confirm Covid-19 infection numbers at a specific facility. [Macau Business, 23/03/2021, "Brazil refinery workers strike over Covid surge": macaubusiness.com] [World Socialist Website, 22/03/2021, "Facing COVID-19 outbreaks and privatization, oil workers shut down refineries in Brazil": wsws.org] [Ultimas Noticias, 22/03/2021, "Strike at Brazilian refinery calls for anticovid measures": en.ultimasnoticias.com.ve]
E(2).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response: A Petrobras spokesman stated that the company could not confirm Covid-19 infection numbers at a specific facility. The oil company defended its management of the pandemic. "Petrobras has spared no effort against covid-19," it said in a statement. "Unfortunately, there is an increase in cases nationwide, and that increase has also affected Petrobras employees," it added. The company also said it deployed "contingency teams" and that the strike had no impact on production. [Macau Business, 23/03/2021: macaubusiness.com] [Ultimas Noticias, 22/03/2021: en.ultimasnoticias.com.ve] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: The company responded in very general terms and did not address the allegation in detail. Furthermore, the Company provided feedback for this indicator. However, it was not material for the assessment.
E(2).2	The company has investigated and taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders: There is no evidence suggesting that the company engaged with the affected stakeholders. The Company provided feedback for this indicator. However, it was not material for the assessment. • Not Met: Identified cause: The company attributes the high infection generically to the nationwide increase in Covid-19 cases. However, there is no evidence that the company conducted an investigation into the underlying causes of the events concerned. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: There is no evidence that the company made changes to its management systems following the events and

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>their human rights impacts. The Company provided feedback for this indicator. However, it was not material for the assessment.</p> <ul style="list-style-type: none"> • Not Met: Stakeholder input to steps taken
E(2).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provided remedy: There is no evidence suggesting the company provided remedy to the affected stakeholders. The Company provided feedback for this indicator. However, it was not material for the assessment. • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> • Area: Right to safe, clean, healthy and sustainable environment • Headline: Lawsuit filed against Petrobras' subsidiary Braskem by victims of its operations in Maceio, Brazil, approved by Dutch courts • Story: On September 21, 2022, a lawsuit that had been filed in May 2022 by families in Maceio, Brazil, affected by the sinkholes caused by the operations of Braskem (a subsidiary of Petrobras), was accepted by the Dutch courts. According to the victims' lawyers, the acceptance of the case for trial in the Netherlands showed that liability had been established and that it was now the courts task to "offer justice to the people who lived in the region". <p>This lawsuit followed the "environmental disaster" caused by Braskem's exploitation of rock salt in Maceio, which affected approximately 57,000 people and numerous businesses and schools in the community. Tremors struck the city of Maceio in Brazil's north-eastern coastal state of Alagoas in 2018 near salt mines operated by Braskem, sending wide cracks up buildings and opening up sink holes. Around 50,000-55,000 people have been forced to move. Consequently, the victims' lawyers demand that the Company "stops denying responsibility for its actions and does the right thing for all those who have been harmed".</p> <p>[Pogust Goodhead, 22/19/2022, "Victims of Brazil's 'sinking city' receive positive news to have case heard in the Netherlands": pogustgoodhead.com] [Reuters, 15/02/2021, "Brazilian residents sue Braskem in Dutch court over salt mines": reuters.com] [Reuters, 19/05/2022, "(OFFICIAL) Brazilians take on Braskem in Dutch court over city of cracks": reuters.com]</p>
E(3).1	The Company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Public response: Braskem has made several statements about the incident over the years. However, Petrobras, which owns 36.1% of Braskem declined to comment on the events. <p>The Company further provided a comment on this indicator. However it was not material for the assessment. [Reuters, 02/03/2020, "Brazil's cracked city leaves corporate heavyweights on the hook": reuters.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response
E(3).2	The company has investigated and taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Engaged with stakeholders: Braskem hired dozens of professionals, from real estate agents to psychologists, to help those displaced. <p>According to the company's 2021 Integrated Report: "We provided priority to the process by establishing several channels of direct communication with the affected families – from face-to-face assistance at the Resident's Center, to support via messaging apps, among other means. By April 2022, more than 200,000 phone assistance had been made via 0800.</p> <p>To inform with even more agility and transparency, the Braskem's communication website was reformulated and became a broader platform with information of interest to the resident and the community about the case. [...].</p> <p>Since 2019, through social dialogue with community leaders, leading residents and merchants, we have provided information and clarified doubts about the Financial Compensation and Relocation Support Program and about works and interventions in the territories, among other topics. Also, as a result of these interactions, we receive demands from communities and seek to support their resolutions, keeping active listening and identifying opportunities for cooperation</p>

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			<p>in order to mitigate the impacts perceived by residents." In addition, the company states: "Braskem also offers a free psychological support service to all people who are part of families residing in vacant areas and are included in the Financial Compensation and Relocation Support Program. Assurances were not suspended even with the pandemic - the consultations were made online." [Braskem, 2021 Integrated Report: braskem.com.br] [Braskem website, 04/02/2021, "Braskem resumes safe operations in its Chlorine-Soda unit in Maceió, with salt coming from outside Alagoas": braskem.com.br]</p> <ul style="list-style-type: none"> • Not Met: Identified cause: Braskem believes the federal study that determined the reasons for the cracks in Maceio is methodologically flawed and inconclusive, and has commissioned studies of its own. Ana Laura Sivieri, Braskem's marketing and communications chief, told Reuters there could potentially be other causes for the tremor and cracking, however, including water damage, the type of soil in the region or a geological fault. <p>Braskem hired investigators and independent geological studies to clarify the events. However, they did not publicly presented investigative results on the underlying causes of the events concerned. [Reuters, 02/03/2020, "Brazil's cracked city leaves corporate heavyweights on the hook": reuters.com] [Reuters, 16/09/2019, "Brazil's Braskem says it has not identified causes of Alagoas damage": reuters.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Identified and implemented improvements: In December 2021, the then-CEO of Braskem was dismissed, partly because Petrobras was dissatisfied with how the company was dealing with the case, according to a source with direct knowledge of the matter. However, Braskem and Petrobras declined to comment about the circumstances of the former CEO's dismissal. The fact that the company did not disclose this information publicly does not make it relevant to the methodology. <p>However, after the events, Braskem permanently ended salt extraction activities in the municipality. After the closure of the rock-salt extraction activity in 2019, in February 2021 the company went back to producing PVC and caustic soda using dry salt imported from Chile. This change in the company's processes allows points to be awarded for this datapoint. [Reuters, 02/03/2020: reuters.com] [Braskem, 2021 Integrated Report: braskem.com.br]</p> <ul style="list-style-type: none"> • Not Met: Stakeholder input to steps taken: The company did not clarify how the views of affected stakeholders were taken into account in the improvement of the company policies.
E(3).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provided remedy: In January 2020, the company announced a deal with prosecutors to provide 1.7 billion reais (\$387.4 million) over two years to relocate and compensate 17,000 residents, though it did not admit blame for the damage. Braskem have offered what lawyers say are unfair sums of compensation after being obliged to remove families from the 'red' danger zones in the area, but have failed to accept liability. Eventually, the company reached a 9.1 billion-reais settlement with authorities in December 2020. <p>According to the company's 2021 Integrated Report: "Currently, on average, more than 650 compensation proposals are submitted monthly, and in just over two years of Financial Compensation Program, the company presented more than 14 thousand proposals (*up to 04/30/2022), from a total of approximately 17.5 thousand proposals, with an acceptance rate of 99.5%"</p> <p>However, it is unclear whether Petrobras was involved in the decision-making process regarding remedy. No information was found as to whether Petrobras used its leverage over Braskem to move them to provide remedy. [Reuters, 02/03/2020: reuters.com] [Reuters, 01/02/2021, "UPDATE 1-Brazil's Braskem estimates \$1.85 billion in provisions due to Alagoas disaster": reuters.com] [Braskem, 2021 Integrated Report: braskem.com.br]</p> <ul style="list-style-type: none"> • Not Met: Evidence for lack of impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders: The amount Braskem offered wasn't enough for many affected stakeholders. This is evidenced by the fact that the residents of Maceio have filed a lawsuit in a Dutch court to seek compensation. <p>Furthermore, the company's 'moral damages' offers have been made on a per-household rather than on a per person basis and have equated to the same as the value of lost luggage by an airline in Brazil or less, according to caselaw from</p>

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			Brazilian Courts. [AP, 20/03/2022, "Urban mining transforms Brazil neighborhood into ghost town": apimagesblog.com] <ul style="list-style-type: none">• Not Met: Remedy delivered• Not Met: Independent remedy process used

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