

Crime Prevention Model

Crimes contemplated in current legislation and behaviors that Repsol expects from us in order to avoid them (1/2)



| CRIME | WHAT DOES IT INVOLVE? | WHAT IS EXPECTED FROM US? |
|--|---|---|
| Bribery | Illegal payments, commissions, gifts or favors to a public official. | Never make illegal payments and always fight corruption. |
| Influence peddling | Influence on a public officer to obtain a benefit for the company. | Strict compliance with legal requirements, regulations and internal controls. |
| Business corruption | Request or acceptance of an unjustified benefit or advantage. It may be between companies or individuals, or in international economic transactions. | Not to limit free competition or seek to obtain competitive advantages through illegal practices.. |
| Illegal financing of political parties | Direct or indirect financing to political parties or their representatives. | Maintain political neutrality. |
| Terrorism | Financing or participating in activities that involve acts of terrorism or that belittle victims of terrorist crimes. | Due diligence on the knowledge of third parties with whom a relationship is to be established on behalf of Repsol. |
| Money laundering | Integration of criminal assets into the legal economic system, pretending that they have been obtained in a licit manner. | Get to know exhaustively all counterparties in our business or operations. |
| Smuggling | Import and export of illegal goods. | Respect all trade control laws. |
| Crimes against the environment | Pollution and mismanagement of waste, of hazardous facilities, or of catastrophic risks. | Preserve the integrity and health of people, prioritize the protection of the environment and the sustainable use of resources. |
| Crimes against workers' rights | Failure to comply with labor laws, suppression of rights, discrimination, limit the freedom of union association or the right to strike | Maintain safety, ensure health in the workplace and respect workers' rights. |
| Human trafficking | Coercive recruitment and transfer of persons, for the purpose of exploitation. | Human rights due diligence in all our business activities and relationships. |
| Fraud | Deception and manipulation for financial gain. | Always be honest about our services and capabilities and never take undue advantage. |
| Crimes against consumers | False or misleading advertising. Fraudulent billing. | Always provide reliable and truthful information to consumers. |
| Crimes related to the market | Market misappropriation for illegitimate purposes, defrauding investors, price alteration, manipulation of quotations or use of privileged information. | Protect our corporate image, take care of our sensitive information and provide reliable data. |
| Crimes related to intellectual property and industry | Undue economic exploitation of works due to lack of authorization from their legitimate owner. | Protect Repsol's tangible and intangible assets and respect the industrial and intellectual property of third parties. |
| Uncovering and disclosure of secrets and unlawful computer access | Industrial espionage. Infringement of privacy and security of data and computer systems. | Treat information appropriately according to its classification, ensure Personal Data Protection and do not seek confidential information from our competitors. |
| Computer crimes | Manipulation or illicit access to computer systems. | Always adhere to computer security protocols and do not access other people's devices. |

Crime Prevention Model

Crimes contemplated in current legislation and behaviors that Repsol expects from us in order to avoid them (2/2)



| CRIME | WHAT DOES IT INVOLVE? | WHAT IS EXPECTED FROM US? |
|---|---|---|
| Crimes against honor | Slander or libel. | To act in an ethical and responsible manner, both personally and socially. |
| Incitement to hatred and violence | Encouragement of hatred, hostility, discrimination or violence against any individual or group. | Respect all human rights, with special attention to the most vulnerable groups. |
| Unfair administration | Improper management resulting in a financial loss. | Responsibility in the administration of own and third-party assets. |
| Corporate offenses | Falsification of accounts, imposition of abusive or harmful agreements, obstruction of due supervision. | Transparency in the documents reflect the legal or economic situation of Repsol companies. |
| Frustration of execution and punishable insolvencies | Frustration of execution due to lifting or improper use of assets. Obstacles to debt collection. Punishable insolvency. | Comply with established authorization levels and internal controls. |
| Tax offenses | Tax violations, social security and subsidy fraud. | Strictly comply with tax and labor obligations and promote cooperative relationships. |
| Urban planning offenses | Promotion, construction or management of building works on unauthorized land. | To have permits and licenses to operate, protecting the environment and people's health. |
| Counterfeiting of currency and stamped bills of exchange | Manufacture, alteration or distribution of counterfeit currency. | Identify the use of counterfeit currency with the means available in our commercial relations. |
| Counterfeiting of credit or debit cards or traveler's checks | Alteration, copy or reproduction of these means of payment. | Never use these means of payment illegitimately. |
| Crimes against public health | Improper processing, handling or supply of substances harmful to health. | Strictly comply with health and safety protocols in each production or distribution area. |
| Misappropriation of public funds | Collaboration in the misappropriation of public money or property. | Accountability and transparency in all acts of management or disposition affecting public assets. |
| Crimes against moral integrity | Hostile acts, degrading treatment or harassment at work taking advantage of a relationship of superiority. | Create a safe working environment and ensure good working climate. |
| Sexual harassment | Solicitation of sexual favors, for oneself or a third party, while performing Company activities. | Create a work environment and climate free of all types of harassment. |
| Prostitution, sexual exploitation and corruption of minors | Sexual exploitation of adults or minors, or dissemination of content of this nature. | Prevent Repsol from being linked to companies or individuals involved in this type of crime. |
| Illegal organ trafficking | Promotion or actual illegal trafficking of human organs and/or their transplantation. | Prevent Repsol from being linked to companies or individuals involved in this type of crime. |
| Animal abuse | Abandonment or causing death, injury or suffering to animals. | Prevent Repsol from being linked to companies or individuals involved in this type of crime. |