



Integrity Policy

Repsol rejects all forms of corruption and fraud, both public and private, and has a **zero-tolerance** policy for any breach to its Integrity Policy.

OUR GOAL:

To reiterate Repsol's commitment to strictly comply with regulations on the prevention and fight against corruption and fraud in every form, not only for the employees within the companies the Repsol Group has a stake in, but also for our business partners.

OUR COMMITMENTS

- Never influence the free will or objectivity of public authorities and officials and other persons outside the Company for the purpose of obtaining any benefit or advantage through the use of practices that are unethical or in violation of any applicable law.
- Never directly or indirectly give, promise, or offer any valuable asset to public authorities or officials or any natural person or corporate entity, for the purpose of obtaining undue advantages for the Company.
- Facilitation payments are prohibited.
- Never directly or indirectly finance or otherwise support any political party, labor union, its representatives, or its candidates.
- Never use donations or gifts to hide undue payments to public authorities or officials or to other entities outside the Company.
- Never directly or indirectly solicit or improperly receive commissions, payments, or benefits from third parties as a result of or in connection with the contracting, investment, disinvestment, financing, or general expenditure operations carried out by the Company.
- Perform due diligence before affiliating Repsol with a third party. Pay special attention to those cases where there are signs of a lack of integrity of the persons or entities with whom business is to be conducted or carried out.
- Record all actions, operations, and transactions carried out by the Company accurately and properly in the Company's books and records.
- Avoid situations that may lead to a potential conflict of interest between the employees' and partners' personal interests and those of the Company.



IMPORTANT

If employees have evidence, doubts, or suspicions regarding any wrongdoing covered by this policy, they are required to report it immediately to their hierarchical superior or through the **Ethics and Compliance Channel** or Repsol's Chief Compliance Officer, who will act in accordance with applicable regulations.

Employees who violate these provisions shall be subject to appropriate disciplinary actions, including, if applicable, termination of their employment or contract, as well as any other possible legal actions or sanctions. Furthermore, Repsol reserves the right to impose any measures it deems appropriate in relation to business partners who fail to comply with it.