

# Keys to manage our relationship with Public Officials

## OBJECTIVE

To offer a guide with good practices to keep in mind when dealing with Public Officials in the development of our professional activity.

## WHO DOES IT APPLY TO?

All Repsol Group employees, suppliers, contractors and business partners, regardless of their position or location.

## WHAT IS A PUBLIC OFFICIAL?

Any person who works in the service of a public entity, or who exercises public functions:

- Holders of public offices at national, regional, local or international level.
- Government or parliamentary and judicial bodies employees.
- Political party representatives and candidates.
- Officials and employees of international public organizations (UN, World Bank).
- Staff of State-owned or publicly controlled companies, especially, national oil companies.

## RELATIONSHIP WITH OFFICIALS

In our work we may interact with Public Officials in a variety of situations: requests for permits, concessions, licenses or aid, consultative processes, public tenders as contractors or suppliers, as partners in our operations and transactions, through intermediaries or advisors, in lobbying actions, in supervisory functions by authorities, in social investment projects, sponsorships, events, congresses and exhibitions, or in crisis situations related to the protection of our assets and operations.

## WHAT NOT TO DO:

- Offer or hand over money, valuable assets or benefits to a Public Official.
- Make facilitation payments to expedite procedures.
- Use personal relationships to influence decisions.
- Make direct or indirect political donations.



REPSOL HAS  
**ZERO**  
**TOLERANCE**  
FOR CORRUPTION

## WHAT TO DO:

- Exercise good judgment and prevent our actions from compromising the Company.
- Act transparently and according with the law.
- Comply with internal regulations and principles of good governance.
- Perform due diligence when engaging intermediary agents to interact with Public Officials and require them to comply with Repsol's Code of Ethics and Business Conduct and the Anti-Corruption Policy.
- When hiring an officer or former Official, require a written statement confirming their compatibility with the activity.

*This document is not exhaustive and does not replace the full text of the norm.*