

# Keys to managing 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?

To all employees of the Repsol Group, regardless of their type of contract, the position they hold, and their workplace, as well as to suppliers, contractors, and business partners.

## WHAT IS A PUBLIC OFFICIAL?

Any person who works in the service of a publicly owned organization or institution, as well as those who perform public functions. For example:

- Holders of public offices at national, international, state, autonomous, regional, or local level.
- Government employees or employees from any international, state, or functional Public Administration, including parliamentary and judicial bodies.
- Persons acting on behalf of a public authority.
- Managers, managers and/or candidates for an office or from political parties.
- International organizations officials (UN, World Bank).
- Staff of public companies, owned or controlled by governments, either through their share capital or voting rights. In particular, national oil companies (NOC).

## In what situations do we interact with Public Officials?

- Request for permits, concessions, licenses, or assistance
- Consultative processes
- Public tenders as contractors or suppliers
- Partnerships in our operations and transactions
- Intermediaries or advisors
- Lobbying actions
- Supervisory functions by public authorities
- Social investment projects
- Sponsorships
- Events, conferences, and exhibitions
- Crisis situations related to the protection of our operations and assets.



## REPSOL HAS ZERO TOLERANCE FOR CORRUPTION

### IT IS COMPLETELY PROHIBITED:

- To offer or give an Public official money, valuable goods, or advantages, whether directly or indirectly
- Make facilitation payments to expedite procedures
- Use our personal relationships to influence a Public Official in order to obtain a favorable resolution
- Make political donations, in cash or in kind, directly or indirectly
- Any conduct that may constitute a bribe and/or compensation to a Public Official, aimed at obtaining a commercial, business, or other type of advantage.

### APPLY THE BEST PRACTICES:

- Exercise good judgment to avoid actions that compromise the Company.
- Establish transparent and legally impeccable relationships with Public Officials within the framework of work activities.
- Observe and understand the demands of legality, transparency, and good governance of the Administration and the Public Function.
- Comply with our internal regulations.

