

CORPORATE POLICY FOR ANTI-CORRUPTION AND ANTI-BRIBERY

Sonangol E.P and its Subsidiaries pledge to observe all the applicable legislation in the different places where the company carries out its activities.

This Policy binds all employees of Sonangol EP and its Subsidiaries, Members of the Board of Directors, Members of Executive Committees, Directors, Trainees, Consultants, Partners, whether to business or contracted companies, suppliers, agents, Public Servants, joint-venture partners and other business associates and any other persons or organizations engaged in collaborative activities or on behalf of Sonangol, likewise all third parties acting on their behalf are prohibited from promising, offering, delivering or paying , directly or indirectly, any improper advantage, whether pecuniary or not, to the Public Agent or the third party related to him, as well as to any other person, and also making payments not established by law, including payments with a view to accelerating administrative procedures.

The delivery, offer, promise or receipt of gifts, entertainment or other benefits, regardless of their value, is considered a violation of this Policy, when the act may inappropriately influence any commercial decision affecting Sonangol or its Subsidiaries or that may result in an undue advantage for Sonangol or its Subsidiaries or any other person.

Employees may not accept or request favors for personal gain, including discounts on personal purchases that would not be available, free or underpriced services, equipment loans, facilities, automobiles, housing, or any other real or personal property, including cash.

For purposes of this Policy, corruption is the effect or act of corrupting someone or something, for obtaining advantages over the third party by means considered illegal or illicit. Examples of corruption include bribery, facilitation payments, fraud and money laundering. For purposes of this Bribery Policy, it is any money, property, services or other thing of value offered or given with the intent to obtain any improper advantage for Sonangol E.P. and / or its Subsidiaries. No Director, collaborator, employee or third party shall assume that Sonangol's interest requires such.

Any employee who is faced with a request for bribery, he/she must present a copy of the Company's policy regarding bribery or explain the policy and should not agree to the bribe. Any attempt of corruption or bribery will result in disciplinary and / or criminal action.



Gaspar Martins