

CORPORATE POLICY OF ANTI-FRAUD

The commitment to pursue high ethical standards aims not only to ensure compliance with laws, regulations and standards, but also to ensure the constant trust of all our Clients, Partners, Suppliers, Service Providers and Employees. Thus, Sonangol E.P. and its Subsidiaries advocate a culture of zero tolerance for fraud and pledge to observe all applicable legislation in the different places where the company carries out its activities.

Sonangol E.P and its Subsidiaries commit to fraud control with focus on proactive prevention and the implementation of detection measures to reduce opportunities for loss. Sonangol E.P and its Subsidiaries' approach to fraud control focuses on maintaining a legal and ethical climate that encourages everyone to protect the Company's assets and report any suspicion of fraud.

When a fraud situation is detected, Sonangol must rigorously investigate and implement measures to recover, mitigate and prevent losses to the Company. These losses can be financial and / or reputational. Sonangol E.P and its Subsidiaries consider as fraudulent all intentional acts, regardless of their nature and value, even if detected before the actual loss. Internal controls are reviewed in the light of fraud events detected to reinforce mitigation measures.

The Management and Employees of Sonangol E.P and its Subsidiaries are responsible for the implementation and operationalization of the necessary means to mitigate the risks of fraud. This responsibility must be daily assumed by the business and fulfilled within the operational structure itself.

This Policy binds all employees of Sonangol E.P and its Subsidiaries, Members of the Board of Directors, Members of Executive Committees, Directors, Trainees, Consultants, Partners and any other persons or organizations that carry out activities in collaboration or on behalf of Sonangol.

Violation of this Policy will result in disciplinary, civil or criminal liability in accordance with the current Legislation and Internal Regulations of the Company.

Should any employee be confronted with a fraud situation, he/she must report it immediately through the alert channel or report it to the Ethics Directorate - email: apoioetica@sonangol.co.ao.

Gaspar**/**Martins

Revision 00, 10/05/2019

Chairman of the Board of Directors