

CORPORATE POLICY OF CONFLICTS OF INTEREST

It is the policy of Sonangol and its Subsidiaries that all its employees must carry out their activities within high ethical standards, impartially and in accordance with the Code of Conduct and Ethics of Sonangol. Any situation generated by the confrontation between the interests of Sonangol and its Subsidiaries and the interests of the employees of Sonangol and its Subsidiaries that may jeopardize the interests of Sonangol and its Subsidiaries or improperly influence the performance of activities of Sonangol employees and their Subsidiaries.

In this sense, the Policy of Sonangol and its Subsidiaries is as follows:

- 1) That the employees do not engage directly or indirectly in any activity that conflicts with the commercial interests of Sonangol and its Subsidiaries that negatively affect the reputation of the company or its relations with third parties or that interfere with the performance of employees' duties, which must always respect the interests of the organization.
- 2) Not to disclose or make use of inside information, for their own or third-party benefit, obtained in reason of the activities carried out.
- 3) Do not engage in an activity involving the provision of services or the maintenance of a business relationship with an individual or legal entity that has an interest in the decision of the agent, of which he/she participates or of the directorate / subsidiary to which he/she belongs.
- 4) Not perform, directly or indirectly, the activity that, by its nature, is incompatible with the assignments of the job description, considering itself as such, including, in areas of developed activity or related matters.
- 5) Not acting, even informally, as attorney, consultant, advisor or intermediary of private interests in Sonangol and its Subsidiaries or in the entities or bodies of direct or indirect Public Administration.
- 6) Not to perform an act in the interest of a legal entity in which the employee of Sonangol or its Subsidiary, its spouse, companion or relatives, blood relatives or alike, in a direct or collateral line, up to the third degree, and which may from him/her be benefited or influence his/her acts of management.
- 7) Do not receive gifts from anyone who has interest of the employee, area or Directorate / Subsidiary in which he/she participates, outside the limits established by regulation.
- 8) Not to provide, even if occasional, services to the company whose activity is controlled, supervised or regulated by Sonangol or its subsidiaries, unless it is entrusted by it.

The activity of Sonangol and its Subsidiaries will be carried out in accordance with the highest standards of commercial honesty, integrity and ethics. In cases where Sonangol policies or standards have stricter requirements than the applicable legislation, both the applicable legislation and the requirements of the company policies or standards shall be complied with.

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



Gaspar Martins