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# CODE OF ETHICS AND INTEGRITY of CONPET S.A.

**MAY, 2025**



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## **CHAPTER I - Field of application, general objectives, terms**

### **Art.1. Introduction**

**This Code of Ethics and Integrity of CONPET S.A. defines the values and principles of conduct and integrity that should be applied in the relations with the partners, colleagues, citizens, etc.**

Since CONPET SA performs its business in a field of national, regional and local interest, and maintaining the reputation of CONPET S.A. is a priority for each of the administrators, directors and employees, the quality of our organization's activity can be ensured by engaging with honesty and fairness in all the actions we carry out.

Providing a pattern of conduct, this Code of Ethics and Integrity (the Code) is a guide to ethically acceptable behavior at the level of company and shareholders/business partners/collaborators, authorities, local community, civil society, other stakeholders. The code establishes principles and rules of behavior that must be applied both by the management and personnel of the company, as well as by the shareholders, business partners/collaborators, authorities, local community, civil society, other stakeholders, in the relations therebetween. The principles detailed therein are not exhaustive, however, they express enough to form a moral orientation for any employee/partner who must decide or must perform a duty/collaboration.

By adopting a solid Code of Ethics and Integrity, the company proves reliability towards the employees, as well as the shareholders, business partners (suppliers, clients), collaborators, authorities, local community, civil society, stakeholders with the obvious purpose of creating an honest, fair and responsible working environment. We want our employees to feel motivated and respected by providing a healthy working environment triggering positive economic results for the company, thus offering the possibility to maintain the workplace, to gain professional background, and to raise social responsibility towards the local and regional community.

The provisions of this Code of Ethics and Integrity should not be interpreted as a restriction or enclosure of certain rights and freedoms, expressly conferred by the applicable legislation, or by other internal regulations of the company, such as the Collective Labor Agreement and/or the Internal Regulation.



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### application

- (1) The Code of Ethics and Integrity of CONPET S.A. defines the values, principles and rules of professional conduct and integrity that the Board of Directors of CONPET S.A., the Director General, the Deputy Director General, the Economic Director, the Deputy Director General 3, as well as the employees of the company must comply with and apply permanently during the performance of the individual employment/mandate contract concluded with the Employer:
  - a) in the activity carried out within the company – in line with the values and objectives of the company, in order to maintain a positive organizational climate;
  - b) in the activity carried out outside the company – in the relations it develops with the shareholders/business partners (suppliers, clients), collaborators, authorities, local community, civil society, other stakeholders for the development of the notoriety and maintain CONPET SA reputation.
- (2) The Code of Ethics and Integrity adopted at CONPET SA level is binding and applies to the management and the company's personnel, as well as to:
  - a) the travelling and delegated personnel within/outside the company, to the pupils/students;
  - b) the business partners (suppliers, clients), shareholders, collaborators, authorities, local community, civil society, other stakeholders carrying out/or not their activity on CONPET S.A. sites throughout the collaboration period;
- (3) The entire personnel within CONPET S.A. must know, acknowledge and act in accordance with the provisions of this Code of Ethics and Integrity both during and outside the working hours.

### Art.3. General objectives

- (1) The Code of Ethics and Integrity aims to ensure the consolidation and development of a corporate climate based on values, principles and ethical professional conduct rules that should support and bring value to the mission, vision, objective and engagements assumed by the Company. By its stipulations, the Code intends to prevent the occurrence of some inconsistent practices bringing any kind of prejudice to the Company.
- (2) The Code of Ethics and Integrity aims to ensure the increase of professional activity carried out by the management and the Company's personnel, a good management in achieving the proposed objectives, as well as in preventing acts of corruption, by:
  - a) Establishing standard norms/rules of ethical conduct that govern both social and environmental responsibility, business conduct and the protection of the economic interest of the Company.
  - b) Public information on professional conduct that the public is entitled to expect from the management and the company's personnel in exercising the occupied positions, by publishing this Code on the company's website.
  - c) Public information of the shareholders, business partners/collaborators, authorities, local community, civil society, other stakeholders regarding the expectations of CONPET SA management when entering a collaboration/contractual relationship, by publishing this Code on the company's website.
  - d) Creating a trustful and mutual respect climate both within the organization and in relation to all stakeholders.
  - e) Ensuring an impartiality climate not allowing that the professional reasoning be influenced by prejudices, conflict of interest or other undesirable influence factors that may occur during the professional activity.

### Art.4. Terms:

- (1) **Disciplinary misconduct** is an act in connection with work, which consists in an action or inaction committed with guilt by the employee, by which he has violated the legal norms, the internal rules, the individual labor contract or the applicable collective labor agreement, the legal provisions of the hierarchical leaders.



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(2) **Affinity:** it is the bond between one spouse and the relatives of the other spouse. The relatives of the husband are, in the same line and to the same degree, the affinities of the other spouse.

(3) **Whistle blower in public interest** — the natural person who carries out a report or discloses publicly related to violations of the law, obtained in a professional context;

(4) **Gift** – material benefit or any other advantage offered during or in connection with the exercise of professional duties by a natural or legal person, with whom the company undertakes or intends to undertake business relations, which is offered or received, without any actual or expected compensation and without any appropriate consideration in return;

(5) **Corruption** – discretionary use of position or function using illicit or illegal means for the purpose of obtaining personal or group interests;

(6) **Management** – the Administrators and directors delegated by the Board of Directors;

(7) **Compliance** – Compliance by the organization with the provisions of the regulatory framework applicable to its activities, its own rules and standards, as well as codes of conduct and professional and standards applicable to the relevant market or industry. CONPET S.A. personnel complies with the Romanian Constitution as well as all legal provisions of the regulatory framework applicable to its activities.

(8) **Conflict of interest** - Represents the situation in which the person exercising a public dignity or a public office has a personal interest of a patrimonial nature, which could influence the objective fulfillment of the duties incumbent on him according to the Constitution and other normative acts. The situation in which an employee of the organization has a personal interest, directly or indirectly, that is contrary to the interest of the organization.

(9) **Ethics Adviser** – the person appointed by the company's management for ethical counseling and monitoring the observance of the rules of conduct, having the following attributions: providing advice and assistance to the staff within the company regarding the observance of the rules of conduct; monitoring the application of the provisions of the code of conduct within the company; drawing up reports on the compliance with the rules of conduct by the staff of the company;

(10) **Adviser of/ for integrity- person** who can be appointed to implement and ensure the employees' knowledge of the legal integrity standards;

(11) **Discrimination** – presupposes any distinction, exclusion, restriction or preference based on race, nationality, ethnicity, language, religion, social category, beliefs, sex, sexual orientation, age, age, disability, non-contagious chronic disease, HIV infection, belonging to a disadvantaged category, as well as any other criterion which has as its purpose or effect the restriction, removal of recognition, use or exercise, or, on an equal basis, human rights and fundamental freedoms or rights recognized by law, in the political, economic, social and cultural field or in any other area of public life.

(12) **Ethics** - a set of rules, principles or ways of thinking that seek to guide the work of a particular group; ethics in the public sector cover four broad areas: establishing the role and values of the public service, as well as the responsibility and level of authority and responsibility; measures to prevent conflicts of interest and ways to resolve them; establishing rules (standards) for the conduct of civil servants; establishing rules that refer to serious irregularities and fraud.

(13) **Incompatibility** – is incompatible that person holding two or more positions at the same time, the cumulation thereof being prohibited by law.

(14) **Inside information** – information of a precise nature which has not been made public, which relates directly or indirectly to one or more issuers or to one or more financial instruments, and which, if made public, could significantly influence the price of those financial instruments or the price of related financial derivatives.

(15) **Integrity** - integrity; a sense of dignity, justice and conscientiousness, which serves as a guide in the conduct of man; honesty, honor, probity.



(16) **Personal interest** – any material or other advantage, whether pursued or obtained by the personnel of the organization, directly or indirectly, for themselves or for others, by using reputation, influence, facilities, relationships, information to which they have access because of performing their duties.

(17) **Public interest** – that interest which involves the guarantee and observance of the rights, freedoms, and legitimate interests of citizens, recognized by the Constitution, by the national legislation and international treaties to which Romania is a party, as well as the performance of the service duties, in compliance with the principles of efficiency, effectiveness and economy of resource expenditure.

(18) **Sensitive position** - a position that presents a significant risk of affecting the objectives of the entity through the improper use of human, material, financial and informational resources or of corruption or fraud;

(19) **Bribery** – the offering, promising, giving, accepting or soliciting an undue advantage of any value (which could be financial or non-financial), directly or indirectly and independently of location(s), by violating applicable law, as an exhortation or reward to a person to act or not to act in connection with the performance of the performance of this person's tasks.

(20) **Organization** – CONPET S.A. structure ensemble;

(21) **Personnel** – The management (management personnel, except for the directors delegated by the Board of Directors), employees and any other persons working within or on behalf of the organization, with decision-making power or without, remunerated or not, regardless the legal form of the agreement they have with CONPET S.A.

(22) **Pantoufage** – prohibitions after the conclusion of the employment within the institution;

(23) **Reporting** — oral or written communication of information, according to the modalities provided in Article 5 para. provided in Law no.361/ 2022 in respect of any act that is a violation of the law;

(24) **Kinship – (1) natural** – is the bond based on the lineage of one person from another person or on the fact that several persons have a common ascendant; (2) **civil** – is the link resulting from the adoption concluded under the conditions provided by law. Kinship is in a straight line in the case of the progeny of one person from another person and can be ascending or descending. Kinship is collateral when it results from the fact that several people have a common ascendant. The degree of kinship is established as follows: a) in a straight line, according to the number of births: thus, children and parents are first-degree relatives, grandchildren and grandparents are second-degree relatives; b) in collateral line, according to the number of births, ascending from one of the relatives to the common ascendant and descending from it to the other relative; thus, the brothers are second-degree relatives, uncle or aunt and nephew, third degree, first cousins, fourth degree.

## Chapter II - Values and principles

### Art.5. General values and principles

(1) The Code of Ethics and Integrity of CONPET S.A. contains the values and principles that have been and will continue to be viable for the future success of the organization. This Code promotes mainly values such as transparency, honesty and integrity in the exercise of various positions, respect for employees, business partners, stakeholders, compliance with the rules of ethical conduct, flexibility, adaptability, and effective communication that should govern the ethical and professional behavior of CONPET SA' management and personnel.

(2) The principles to be detailed below are exhaustive, though associated with a sense of responsibility towards partners or other stakeholders, establish essential rules of ethical behavior applicable to the entire personnel of the company and beyond. The values and principles governing the professional conduct within CONPET SA are:



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**Integrity** - as a value assumed by an individual or an organization, means the consistency between actions, values, principles and rules of law. In the business environment, an organization is deemed upstanding if it correctly informs the public opinion and stakeholders regarding its plans (transparency), if it does what it has said it will do (consistency, predictability and rectitude) and takes responsibility for its decisions and actions (bears legal and social responsibility). CONPET S.A., its management and personnel forms a group with a fair and honest conduct, which shows consistency between actions, values, principles and rules of law.

In CONPET S.A. are declared any personal interests which may conflict with the objective exercise of the job duties and all due diligence has been made as to avoid such situations.

b) **Loyalty** - The management and personnel of CONPET SA are committed to the organization, stakeholders and community/company as a whole to achieve the objectives assumed.

c) **Responsibility and Liability** - CONPET S.A. management and personnel comply with their obligations and take responsibility for their own actions. All employees of the company are liable, as per the legal provisions, for the failure to adequately fulfill their attributions. Any negative news regarding actions or inactions involving the company's personnel and impacts the image/ company's standing may influence the stock market price of the Company.

d) **Transparency** - The management and personnel of CONPET S.A. are in an open and constructive dialog, with all stakeholders, dialog based on respect and professionalism. Within CONPET S.A. is being provided access to information regarding the decision-making process.

e) **Impartiality and independence** - CONPET S. A. management and personnel must have an objective and neutral attitude in exercising their duties towards any political, economic, religious or any kind of interest.

f) **Non-discrimination** - The management and personnel of CONPET S. A., as well as its partners, do not have discriminatory attitudes towards anyone, regardless of the race, gender, religion, sexual orientation, political membership or other criteria that may be the basis of discrimination.

g) **Respect** - CONPET S. A. management and staff show respect in their interactions with other people in their professional activities, inside and outside the organization.

h) **Priority of the interest of the company** - CONPET S. A. management and personnel have the duty to consider the interest of the company above the personal interest, in exercising the duties of the function and performing the duties of the service.

(i) **The Professionalism** - the Management and CONPET S.A. have the obligation to perform their duties with responsibility, competence, efficiency, promptness and fairness.

j) **Effectiveness in fighting corruption** – CONPET S. A. management and personnel are engaged in the application of anti-corruption procedures, tailored and proportionate according to the institutional risks and vulnerabilities, as well as depending on the resources and complexity of the activities carried out.

k) **Freedom of thought and expression** – CONPET's management and employees can express and base their opinions, in compliance with the rules of law and good morals.

l) **Honesty, dignity and fairness** - The management and the employees, in exercising their mandate or performing their duties, must comply with the legislation in force, with maximum seriousness, the provisions of the regulations / internal rules (Code of Ethics and Integrity, Collective Labor Agreement, the Regulation regarding the received/offered gifts on the occasion of protocol activities when exercising their mandate or position, Internal Regulation, procedures, others).

m) **Confidentiality** – The management and the personnel of the company have the duty to act to properly protect the information in balance with the need for transparency and responsibility. The management and personnel shall respect the confidentiality of the information they take note of in the performance of their



disclose it to a third party without an authorized agreement, except where the communication of information results from legal rights or obligations corresponding to the work tasks.

**n) Professional competence** – The management and the personnel of the company must constantly act to improve and maintain an appropriate level of knowledge and skills, to carry out the required activities at work, and at the required quality level, in accordance with the applicable provisions and standards.

**o) Prevention of integrity incidents** – The anti-bribery management system implemented and certified in CONPET SA organization provides background verification criteria for business partners and new employees. Compliance with the anti-bribery policy CONPET SA is one of the basic requirements of the anti-bribery management system.

At the level of the organization, reasonable measures are taken to identify bribery risks and to control/prevent occurrence thereof. The corruption/bribery risk assessment is communicated and documented, and any relevant change in the organization leads to a reassessment.

The anti-bribery compliance function (designated according to SR ISO 37001:2017) has the responsibility and authority to report on the performance of the anti-bribery management system, to the management body (Council of Administration) and management at the highest level.

**p) The Corporate Social Responsibility of CONPET S.A. (Corporate Social Responsibility-CSR)**

The corporate social responsibility of CONPET S.A. is integral part of the company's vision and strategy and the respect towards people, responsibility towards the environment and involvement in the community's life are essential values and major priorities for our organization.

The CSR policy of CONPET S.A. sets the general principles, strategic orientation and the general actions framework which guides the company's responsible behavior at social level, being enforceable and supplemented by all the policies and internal by laws set in this respect.

CONPET S.A. applies and observes the principles of the ISO 26000 standard on social responsibility, namely: liability for the impact of the activities on the company, economy and environment, transparency, ethical behavioral, respect for the concerns of the interested parties, for the state of law, for the behavioral international norms, respect for human rights.

CONPET S.A. approaches the following main topics on social responsibility:

- ✓ Organizational management;
- ✓ Human rights;
- ✓ Professional practice;
- ✓ Environment;
- ✓ Fair practices;
- ✓ Involvement and development of the communities.

CONPET SA withholds its commitment to respect fundamental human rights and does not use forced labor, respects the minimum age limit of employment defined by national legislation or regulations, respects the legal rights of minorities, the right of employees to freedom of association and collective bargaining, membership or non-membership of a trade union, as per the applicable legislation, promotes equal opportunities and protection against discrimination and harassment, provides the right to adequate remuneration, education and qualification, proper working hours as per national legislation and does not participate whatsoever to human trafficking, does not use force, fraud or coercion to obtain labor or services, gives great importance to safety and health protection at work.



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CONPET SA entirely commits to comply with the environmental legislation – carries out its business in strict compliance with all applicable laws and permits relating to air emissions, water and soil quality and waste management. We are aware of the possible effects given the potential environmental risks associated with the transport of crude oil, rich gas and condensate and that is why the company has implemented an environmental management system certified according to ISO 14001, which ensures the identification and continuous control of environmental aspects and associated impacts on all operations.

The health and safety at work of our employees is one of the central pillars integrated in our human resources management policy. CONPET SA counts on the principle of prevention, providing the employees with a healthy and safe working environment in accordance with industry standards and applicable laws and regulations. The company has implemented a health management system certified according to ISO 45001, which is intended to improve the safety and health of our personnel.

### **Chapter III - Norms/General Rules of Ethical Conduct in the Workplace**

#### **Art. 6 Personnel relationship, including personnel selection and evaluation:**

- (1) CONPET SA management and personnel must always behave in a civilized manner, show responsibility, respect, good faith, fairness, moral and professional integrity, collaboration and professional support in dealing with their superiors, colleagues, subordinates, as well as with the shareholders in view of carrying out the activities specific to each workplace in a favorable climate, and to maintain a high level of the prestige of the organization and its personnel.
- (2) CONPET S.A. must ensure an environment conducive to teamwork and actively promote, the management must be a model of ethical behavior and promote an organizational climate in which the organization's ethical values, policies and standards are known and respected.
- (3) Within CONPET S.A., the communication channels must be open from both management towards personnel and the other way round, the communication being based on trust and mutual respect expressed by the organization's personnel at all hierarchical levels.
- (4) CONPET S.A. uses fair employment practices, including objective evaluation, prevention/ avoidance of conflicts of interest, prevention of the pantoufle situations, of the incompatibility and bribery situations, as well as the prohibition of any form of discrimination in decision-making regarding personnel selection and evaluation.
- (5) CONPET S.A. provides fair treatment to all its personnel, including equal pay for equal work, and provides support for the improvement of the vocational training and ongoing training and development.

#### **Art.7 Exercising the Right to Freedom of Expression**

- (1) The personnel and management of CONPET SA have the right to free expression, under the conditions of the law and internal norms;
- (2) In exercising the right to free expression, the personnel and management of CONPET SA have the obligation not to harm the dignity, image, as well as the intimate, family and private life of any person;
- (3) In the performance of their duties, the personnel and management of CONPET SA have the obligation to respect the dignity of the position held, correlating the freedom of dialogue with the promotion of the interests of CONPET SA;



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personnel and management of CONPET SA have the obligation to respect the freedom of opinion and not be influenced by personal considerations or popularity. In expressing opinions, the personnel and management of CONPET SA must have a conciliatory attitude and avoid generating conflicts due to the exchange of opinions.

(5) In CONPET SA, the use of offensive, insulting language, personal assault as well as insulting behaviors are strictly prohibited.

#### **Art. 8 Corporate Loyalty**

(1) The personnel and management of CONPET SA have an obligation to loyally defend the prestige of the organization where they carry out their activity, as well as to refrain from any act or fact that may cause damage to its image or legal interests.

(2) The personnel and management of CONPET SA are forbidden to:

- (a) publicly express assessments that are not in line with reality in relation to the activity, policies and strategies of CONPET SA.;
- (b) make assessments in relation to disputes in progress and in which CONPET SA is a party or to provide unauthorized information in relation to such disputes, if not authorized to do so;
- (c) disclose the information to which it has access in the exercise of its function/mandate, if such disclosure is likely to attract undue advantages or to prejudice the image or rights of the organization or of the personnel;
- (d) provide assistance and advice to natural or legal persons in order to promote legal or other actions against the Company.

(3) The provisions of letters a) - d) shall also apply after the termination of the employment relationship, the mandate contract or the management contract, for a period of 2 years, if the provisions of special laws do not provide for other terms.

(4) The provisions of this Code cannot be construed as derogation from the legal obligation of the management and personnel of CONPET SA to provide information of public interest to those interested, under the law, or as a derogation from the employees' right to make reports based on Law no. 361/2022 on the protection of whistleblowers in the public interest.

#### **Art.9. Obligation to inform on the personal status generating legal acts**

The personnel and management of CONPET SA have the duty to inform, correctly and completely, in writing, about the factual and legal status concerning themselves and that generate administrative acts under the conditions expressly provided by the law.

#### **Art.10. Use of Public Image**

In consideration of the position held, the personnel and management of CONPET SA have the obligation not to allow the use of their own name or image in advertising actions to promote a commercial activity, as well as for electoral purposes.

#### **Art.11. Limitation of Participation to Procurement, Leases and Rentals**

(1) The personnel and management of CONPET SA cannot acquire an asset owned by the company, subject to sale under the conditions of the law or internal rules/regulations, in the following situations:

- a) when he became aware, during or as a result of the performance of his duties, about the value or quality of the goods to be sold;
- b) when he participated, in the exercise of his job duties, in the organization of the sale of the respective good;



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ence the sales operations or when it has obtained information to which the persons interested in buying the good did not have access.

(2) The provisions of para. (1) shall also apply accordingly in the case of concession or lease of an asset owned by Conpet S.A.

(3) The personnel and management of CONPET SA are forbidden to provide information regarding the goods owned, subject to sale, concession or rental operations, under conditions other than those provided by law, or internal rules/regulations.

#### **Art.12. Conduct in International Relations**

(1) The management and personnel of CONPET SA. in international organizations, educational institutions, conferences, seminars and other activities of an international nature have the obligation to promote a favorable image of the country and the organization they represent;

(2) In relation with representatives of other states, the management and personnel of CONPET SA are forbidden to express personal opinions on national issues or international disputes;

(3) In foreign trips, the management and staff are obliged to conduct themselves in accordance with the rules of protocol and are forbidden to violate the laws and customs of the host country.

#### **Art.13 Professionalism, Objectivity and Responsibility in decision making**

(1) In the decision-making process, the personnel and management of CONPET SA have the obligation to act according to the legal provisions as well as the internal norms/regulations, to exercise their capacity of appreciation in a grounded and impartial manner.

(2) The management of CONPET SA is obliged to support the motivated proposals and initiatives of the subordinated personnel, in order to improve the activity of the organization in which it operates.

(3) In the exercise of coordination duties, as well as specific duties of management positions, the personnel has the obligation to ensure the organization of the personnel activity, to manifest initiative and responsibility and to support objective proposals subordinated personnel.

(4) The management personnel has the obligation to ensure equal opportunities and treatment regarding the career development of the subordinated personnel, under specific legislation applicable to each category of personnel. In this respect, they have the obligation: a) to distribute the tasks in a balanced manner, corresponding to the level of competence related to the occupied function and the individual career of each subordinate person; b) to ensure coordination of the way of performing the tasks, with the proper use of the competences of each subordinate person;

c) to monitor the individual and collective professional performance of subordinated personnel, individually report inadequate performance and implement measures to improve individual and, where appropriate, collective performance where necessary;

d) to examine and objectively apply the criteria for assessing professional competence for subordinated personnel when proposing the granting of material or moral incentives;

e) to objectively assess the need for professional training of each subordinate and to propose the participation in training and professional development programs for each subordinated person;

f) to delegate tasks and responsibilities, according to the law, to the subordinate persons who have the knowledge, skills and meet the legal conditions necessary for the exercise of the respective position;

g) to exclude any form of discrimination and harassment, of any nature and in any event, in respect of subordinated personnel.

(5) In order to ensure the necessary conditions for the impartial performance of the duties arising from hierarchical relations, the management and personnel of CONPET SA have the obligation not to engage in patrimonial relations with the subordinated personnel.



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#### **Art.14 Fulfillment of Duties**

- (1) CONPET SA management and personnel is responsible for the performance of their duties from the position they hold, as well as the duties delegated thereto.
- (2) The personnel has the duty to fulfill the provisions received from the hierarchical superiors.
- (3) The personnel has the right to refuse, in writing and reasoned, the fulfillment of the dispositions received from the hierarchical superior, if they consider them illegal. The employee is bound to bring to the attention of the hierarchical superior of the person who generated such situations.
- (4) The personnel has the obligation to solve, within the time limits set by the hierarchical superiors, the works and the assigned tasks.

#### **Art.15 Compliance with the Requirements**

- (1) CONPET S.A. is a reliable business partner in all relationships and with all relevant interested parties they enter into contact with, committing to observe the rule of law, observing all national laws and regulations, as well as the behavioral international norms.
- (2) The management and personnel of CONPET SA are required, by their acts and actions, to observe the legal regulations, internal procedures and guidelines, the decisions/dispositions of the Director General on ethics and integrity and for the implementation thereof, in accordance with their respective tasks
- (3) The management and personnel of CONPET S.A. have the obligation that, by their acts and dees, respect the legal regulations, the rules and internal procedures, the decisions/ dispositions of the Director General related to the ethics and integrity.
- (4) The management and personnel of CONPET SA must comply with internal provisions, here included the provisions of the integrated management documents, the good practices and standards that CONPET SA has committed to comply with.
- (5) The management and personnel of CONPET S.A. must act so that the image of CONPET SA not be affected.
- (6) The management and personnel of CONPET S.A. must respect the company's values and coordinate the company's activity in accordance therewith.

#### **Art.16 Fighting and preventing Corruption**

- (1) CONPET S.A. expressed the adherence to the fundamental values, principles, objectives and monitoring mechanisms of the National Anti-Corruption Strategy, committing to support the anti-corruption fight, promote integrity, the prioritize the public interest and the company's interest, as well as transparency of the decision-making process. In compliance with the provisions of GD no. 1269 /2021, CONPET S.A. published on its company webpage, the Declaration on assuming the corporate integrity Agenda within the coordinates of 2021-2025 Anti-corruption National Strategy. By this Declaration, it is being confirmed that at CONPET SA level, continue to be set measures to prevent the acts of corruption and apply the integrity standards, concurrently with the implementation of the measures to prevent/control identified risks and vulnerabilities to corruption, included in the own integrity plan, issued in accordance with the fundamental values and principles of the Anti-corruption national strategy.
- (2) CONPET S. A. shows zero tolerance for any act of corruption or violation of the law. The management and staff of CONPET S. A. shall not accept, solicit, offer, promise, grant or authorize, directly or indirectly, any bribe, reward, reward, payment or any other attempt to pay attention (gifts, hiring, hiring, contracts or advantages of any kind) from or to third parties to influence or give the impression that they influence certain actions, lack of actions or decisions, or, with the aim of incorrectly obtaining an advantage, maintaining a business interest or gaining undue influence on the actions of that third party.



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agement does not tolerate any act of bribery, any violation of anti-bribery provisions being investigated and evaluated and, as the case may be, appropriate actions will be initiated.

(4) The management of CONPET S A shall not subject to any form of sanction or retaliation any employee or relevant third party for the refusal to take part in an act of bribery, directly or indirectly or in the case of reports of acts or attempts to bribe.

#### **Art.17 Conflict of interest and pantouflage prevention**

(1) The management and personnel of CONPET S.A. have the obligation to comply exactly with the legal regime and all the regulations stipulated in the internal rules/regulations/procedures adopted at the level of the company, in the matter of conflict of interests and pantouflage prevention. The situations in which CONPET S.A. personnel may be in conflict of interest are identified in the specific procedures adopted at the level of the company.

(2) The management and personnel of CONPET S.A. shall not engage directly or indirectly in business relations with economic operators, natural or legal persons, which would affect the correct, honest and conscientious performance of their duties.

(3) The management and personnel of CONPET S.A. should not be influenced by personal interests or by pressures of any kind in the performance of their duties.

(4) Persons who are spouses, relatives or affinities up to the fourth degree with the Director General of CONPET S.A. may not be internal auditors and may not occupy positions within a control structure within the company.

(5) The internal auditors/personnel of the control structure may not be appointed to carry out public internal audit/control missions at a structure/entity within the company if they are spouses, relatives, or affinities up to the fourth degree with its manager.

(6) The internal auditors/personnel of the control structure must not be involved in any way in the performance of the activities they can potentially audit/control, nor in the development and implementation of the company's internal control systems.

(7) The Internal auditors/personnel within the control structure who have responsibilities for carrying out programs and projects financed in whole or in part by the European Union should not be involved in auditing/controlling these programs.

(8) Internal auditors/personnel of the control structure shall not be entrusted with public internal audit missions in the sectors of activity in which they have held positions or have been otherwise involved. This ban may be lifted when 3 years have passed.

(9) The management and personnel of CONPET SA must refrain from any conflict of interest. Any possible conflict of interest must be declared, by means of a written statement, according to the internal procedures/regulations in force, to the competent organizational entity, as soon as it arises, and in the case of members of the Board of Directors and the management, the relevant corporate legal provisions must be considered.

(10) If a representative of the management or personnel of CONPET SA is involved in a situation of conflict of interest, the management of CONPET S.A. shall analyze and resolve the situation together with the competent organizational entity.

(11) The management and personnel of CONPET S.A involved in decision-making processes must complete a declaration of interest or an affidavit that they are not in any conflict of interest and submit it to the designated person responsible within the organizational entity with specific competences. The declaration of interests will be updated by the management personnel annually and at each appointment/termination of the position, it is submitted on the e-DAI platform of the National Integrity Agency according to the legal regulations in force.



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### **Art.18 Incompatibilities**

- (1) The management and personnel of CONPET S.A., are forbidden to occupy any other position, which generates incompatibility situations. For example, the employee of CONPET S.A. who is at the same time a member of the Romanian Parliament (deputy or senator) or a lawyer is in a state of incompatibility.
- (2) The management and personnel of CONPET S.A. have the obligation to comply exactly with the legal regime and all the regulations provided for in the internal procedures adopted at the level of the company, in terms of incompatibilities.
- (3) CONPET S.A. personnel is obliged to inform the management in case of incompatibility state and must submit a declaration of incompatibility to the competent organizational structure, in accordance with the provisions of the specific legislation and the internal procedures/regulations adopted at the level of the company.

### **Art.19 Political activity**

- (1) CONPET S.A. undertakes not to finance, directly or indirectly, political parties or groups on the territory of Romania, as a collective obligation enforceable against all political forces. At the same time, CONPET S.A. will not publicly support a candidate or a political party during the election campaign or in the elections.
- (2) The management and personnel of CONPET S.A. are not forbidden to sympathize or belong to legal political groups, since their political concerns do not affect professional performance and propaganda is not made in the workplace.
- (3) CONPET S. A. management and personnel have the obligation, in the exercise of their duties, to refrain from expressing or publicly manifesting political beliefs and preferences, not to favor any political party or organization to which the same legal regime as political parties is applicable.

### **Art.20 Union's activity**

- (1) CONPET SA employees have the right to set up or join a trade union, to request, when they consider themselves discriminated against, the support of the trade union organization within the company in order to solve the situation at the workplace, in accordance with the provisions of this Code and of the applicable internal regulation.
- (2) CONPET SA management has the obligation to consult with the trade union or, as the case may be, with the employees' representatives regarding the decisions likely to substantially affect their rights and interests, in accordance with the provisions of the Internal Regulation in force.

### **Art.21 Protecting the organization's assets**

- (1) CONPET SA personnel are required to protect the assets and resources of the organization and to prevent their improper and/or unauthorized use, deterioration, vandalism or use. At the same time, the use of CONPET S.A.'s assets and resources for personal benefit is prohibited.
- (2) CONPET SA personnel is obliged to use the working time, as well as the assets belonging to the company only for the performance of the activities related to the position held within the company.
- (3) Any waste, misuse or unauthorized use, destruction or theft of property belonging to the organization must be communicated immediately to the higher hierarchical level.
- (4) Upon termination of the individual employment contract, the personnel are obliged to return what is legally part of the organization, including documents (both in physical and electronic form).
- (5) The organization's intellectual property will be protected by its personnel.

### **Art.22 Equality and diversity**



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(1) CONPET S.A. respects and guarantees equal and non-discriminatory treatment in relation to its personnel, partners and collaborators of the organization.

(2) In performing their position, the management and personnel of CONPET S.A. have an obligation to conduct a professional conduct, as well as to ensure the transparency, impartiality and effectiveness necessary to gain and maintain the trust of its partners, collaborators and clients. They are obliged to ensure equal treatment and to refrain from acts of discrimination on the grounds of race, ethnicity, citizenship, color, language, religion, social origin, genetic features, sex, sexual orientation, age, disability, non-contagious chronic disease, H.I.V. infection, political choice, family situation or responsibility, membership or trade union activity, membership of a disadvantaged category.

### **Art.23 Gifts and entertainment expenses**

(1) The management and personnel of CONPET S.A. do not request or accept gifts, services, favors, invitations or any other advantages, which are personally intended for them, family, parents, friends, etc. and which may influence their impartiality in the performance of their duties.

(2) If the personnel of CONPET S.A. is given gifts during the performance of their duties, they have the obligation to declare and present the to the Director General of CONPET SA, within 30 days from the receipt, in compliance with the legislation in force and the provisions of the Rules on gifts received/given free of charge on the occasion of protocol actions in the exercise of his mandate or position, adopted at the level of CONPET S.A. and published on the website of CONPET S.A.

(3) The expenses for the participation in conferences, seminars and courses/trainings in which the staff of CONPET S.A. takes part are borne by the organization, in accordance with its internal procedures.

### **Art.24 Non-disclosure of the State secret, confidential information and confidentiality**

(1) CONPET SA management and its personnel have the obligation, throughout the duration of the employment contract and after its termination, to not transmit data or information of which they become aware during the performance of the contract, under the conditions laid down by internal regulations, the collective employment agreement or individual contracts. The exception to this rule is constituted only by the statements made to the competent authorities in breach of the law.

(2) The management and personnel of CONPET SA have the obligation to keep the State secret, confidential information, as well as confidentiality related to the facts, inside information or the documents they take note of in exercising their position, under the law, with the application of the dispositions in force on free access to public information.

(3) It is forbidden to disclose personal data relating to management and personnel without the consent of the person concerned, unless there are legal requirements in this regard.

(4) The disclosure of information obtained during professional activity which could be used to affect fair competition in the course of procurement procedures shall be forbidden.

(5) The management and personnel of CONPET S.A. must respect the confidentiality of information acquired during professional activities and not disclose it in their personal interest, directly or indirectly to a third party. This information is property of CONPET S.A. and cannot be disclosed outside the organization.

(6) The obligation to respect confidentiality is maintained even after the conclusion of the professional relationship between the company's personnel and CONPET S.A., in accordance with the legislation in force and the provisions of the individual employment contract, where applicable.

(7) The use of information obtained by the management and personnel of CONPET SA during its professional activity for personal purposes or in a manner which may be contrary to the law or to the legitimate and ethical objectives of the organization shall be forbidden.



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(8) CONPET SA guarantees the confidentiality of the information at its disposal; the processing of such information is carried out using methods which ensure maximum transparency for the interested parties and do not allow third parties access.

(9) Both shareholders and partners' personal data we hold and process shall not be disclosed to third parties, except as provided by applicable legislation.

(10) The provisions of Art.24 shall be applied after termination of employment relationship as well, for a period of three years, unless otherwise specified in special laws.

#### **Art.25 Harassment and discrimination**

(1) The management and personnel of CONPET S.A. must have a decent and adequate posture both inside and outside the organization.

(2) No abuses, threats, physical, verbal or sexual intimidation or harassment are tolerated, either in terms of relations developed with all categories of public, or in relations with the other employees within the company who are aiming at tainting the employee's dignity by creating degrading, intimidating, hostile, humiliating or offensive environment. In this respect, CONPET S.A. encourages the reporting of all types of moral harassment, notwithstanding the harasser.

(3) At the level of CONPET SA, moral harassment in the workplace is not tolerated, namely any:

- a) behavior exercised in respect of an employee, by another employee who is his hierarchically superior, by a subordinate and/or by a hierarchically comparable employee, in relation to employment relations, which have as purpose or effect a deterioration of working conditions by harming the rights or dignity of the employee, or, by affecting his physical or mental health or by compromising his professional future, behavior manifested in any of the following forms: hostile or unwanted conduct; negative verbal comments; hostile actions or gestures;
- b) behavior which, by its systematic nature, may impair the dignity, physical or mental integrity of an employee or group of employees, jeopardizing their work or degrading the working climate.

(4) Every employee is entitled to a workplace without moral harassment. No employee shall be sanctioned, fired or discriminated against, directly or indirectly, including in respect of payroll, training, promotion or extension of employment relations, or, because he was subjected to or refused to be subjected to moral harassment in the workplace.

(5) Employees who commit acts or acts of moral harassment in the workplace are subject to disciplinary responsibility, under the terms of the Internal Regulation of the company. Disciplinary liability does not remove the contravention or criminal liability of the employee for the respective actions.

#### **Art.26 Money-laundering**

CONPET S.A. will not take part in money-laundering activities and undertakes to develop and implement policies and mechanisms to mitigate it, upon the request of the stakeholder, in accordance with the European and international directives and standards, as well as with national and international legislation in force.

#### **Art.27 Transparency**

(1) The company acknowledges the fundamental role of the information media and communicates transparently towards the public, through all communication media. In relation to civil society, CONPET SA employees act according to the principles of transparency, respect, and concern for the organization public image.

(2) CONPET SA, by its personnel shall act promptly, in a complete and non-discriminatory manner, in response to requests for public information, as defined in Law 544/2001.



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(3) CONPET S.A. has the obligation to ensure the access of any person to the information of public interest, in accordance with the legal provisions related to the free access to public interest information.

(4) The access to public information shall be ensured ex officio or upon request, through the competent organizational entity within the company that publishes all public interest information provided by the legislation in force.

(5) CONPET SA also publishes other data and information at the company's level by decision of the Director General, in compliance with relevant corporate dispositions and the legal dispositions of integrity set out at the level of National Anti-Corruption Strategy, respecting, however, the privacy of the personal data's management and its employees.

(6) The data provided by CONPET SA is explicit, accurate, transparent and complete in terms of contents so as to enable those with whom they are addressed to make informed choices.

#### **Art.28 Sensitive positions**

(1) The sensitive positions at CONPET S.A. level are being identified as per the legal requirements in force and the applicable procedures. Proper control measures are being established, so that the negative effects on the activities performed within the organization be minimum.

#### **Art.29 Declaration of Assets and Interests**

(1) At company's level, through the person responsible designated by the competent organizational entity the implementation of the legal provisions related to the asset and interest statements are ensured.

(2) The management of CONPET SA and the designated personnel are required to complete and submit annually the asset and interest statement and upon appointment/termination in a management position on the e-DAI platform of the National Integrity Agency under the terms set by Law 176/2010.

#### **Art.30 Ethics and Integrity Adviser**

(1) At the level of CONPET S.A. is appointed an ethics and integrity adviser who perform his/her activity/perform his/her duties in accordance with the provisions of the job description and applicable Regulation on the activity of the Ethics and Integrity Adviser of CONPET SA.

#### **Art.31 Corruption Risks Assessment**

(1) At the company's level there are corruption risks being identified as per the legal requirements in force and the applicable procedures. Proper/control measures are being established, so that the negative effects on the activities performed within the organization be minimum.

(2) At CONPET SA' level, by the Corruption Risk Registry (here included bribery) and the Integrity Plan adopted, is ensured the implementation of prevention/control measures for risks and vulnerabilities to corruption identified at the level of the company. The implementation of the measures set out in the registry and in plan is assessed annually, the latter being evaluated whenever new risks and vulnerabilities arise.

(3) CONPET SA personnel, in charge with the implementation of the prevention/control measures for the corruption risks and vulnerabilities identified at company level by the documents set out in Para 2, is bound to ensure the fulfillment/implementation thereof.

#### **Art.32 Integrity incidents assessment**

(1) At the company's level, corruption risks are identified as per the legal requirements in force and the applicable procedures. When an integrity incident occurs, prevention/control measures are evaluated and implemented to prevent the occurrence of a similar incident.



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(2) An integrity incident at the level of CONPET SA is defined as one of the following events regarding the status of an employee, referring to:

- a) Disciplinary termination of employment or work relations due to the breach of the deontological norms or of any other similar provision meant to protect the integrity of the public function, including those established by secondary and tertiary legislation for which this sanction is provided;
- b) Prosecution or sentencing for committing corruption offence or an act related to non-compliance with the regime of prohibitions, incompatibilities, conflict of interest or declaration of assets;
- c) Final damage inspection report issued by the National Integrity Agency regarding the violation of legal obligation in terms of unjustified assets, conflict of interest or incompatibilities' regime.

### **Art.33 Protection of the Public Interest Whistleblower**

(1) CONPET SA has adopted and implemented a procedure on the reporting in public interest, which respects the principles outlined in this Code of Ethics and Integrity and the legislation in force.

(2) CONPET SA guarantees the protection of the public interest whistleblowers and discloses, on the company's website, the platform – "CONPET PUBLIC INTEREST WHISTLEBLOWER" for the formulation of the public interest reports, the reports being taken over with the anonymization of the whistleblowers identity, for the purpose of research and procedural and legal settlement of the notified facts and cases.

(3) The persons choosing to report violation of the law may choose the following options:

- a) by telephone, at no. 0244 401360/2411, public interest warning manager,
- b) by post at the address CONPET SA – 1-3 Anul 1848 Street, code 10559, Ploiești, Prahova – to the attention of public interest warning manager,
- c) personally, by presence at the headquarters of CONPET SA (with prior appointment made by e-mail at [avertizor@conpet.ro](mailto:avertizor@conpet.ro)).

(4) The company's management will not allow, under any circumstance, any form of repression directed towards the persons having reported an irregularity, in good faith, even if the aspects reported are not confirmed or are partially confirmed.

## **Chapter IV - Conduct in dealing with Shareholders, Authorities, Business Partners and Community**

### **Art.34 The Relationship with Shareholders**

(1) CONPET SA provides equal treatment to all the shareholders who are in the same position concerning the participation and exercise of the voting rights during the General Meetings of Shareholders. At the same time, the company provides equal treatment for all shareholders of the same type and class who are in an identical situation.

(2) Information that may influence the course of CONPET SA stocks at the Bucharest Stock Exchange and the shareholders' decisions, defined as "inside information" by the current law and internal procedures, is communicated to the shareholders and the capital market by the entity that has attributions in this role, and then published on the company's website and transmitted to the mass-media by way of reports, press releases according to the capital market legislation in force.

(3) In compliance with the provisions of the legislation regarding the capital market, the misuse of inside information is forbidden. The abusive use of inside information occurs whenever a person holding inside information uses this information to acquire or dispose of financial instruments to which that information relates, in his own name or on behalf of a third party, directly or indirectly.

(4) It is forbidden to disclose inside information in an unauthorized manner. Unauthorized disclosure of inside information occurs when a person holds inside information and discloses it to another person unless



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disclosure is made under the normal exercise of work duties, profession or position, including where disclosure is qualified as a market survey.

(5) The abusive use of the position held by the shareholders or the capacity of administrator or employee of the issuer, by using unfair or fraudulent acts that have as scope or result the violation of securities rights and other financial instruments held, as well as harming their owners are forbidden.

(6) A person should not take part or attempt to engage in market manipulation practices.

(7) Failure to comply with these provisions constitutes a violation of this Code of Ethics and Integrity, but especially of the applicable law, in which cases the Employer may resort to material punishment varying with the seriousness of the actions, going all the way to the most severe sanction of all: the termination of the employment contract.

(8) All the information and market releases addressed to shareholders and investors are available on the company's website ([www.CONPET.ro](http://www.CONPET.ro)).

### **Art.35 The Relationship with the Authorities and Business Partners**

(1) The management and personnel of CONPET SA ensure collaborative relations with local, central authorities as well as with other entities, based on principles of fairness and transparency, without compromising the independence and economic objectives of the organization and respecting the principles of behavior and values of this Code of Ethics and Integrity.

(2) In relationship with the authorities, the management and personnel of CONPET SA will refuse any requests for interventions or suggestions for intermediation that could affect the legal performance of certain activities within the organization, inclusive of those made by offering undue advantages in exchange.

(3) CONPET SA shall react in solidarity with the other organizations in its line of business, against any pressure of corruption, extortion of funds or unlawful obstruction exercised by the governmental or local authorities.

(4) CONPET SA, through its representatives, promotes an open and ongoing dialog with clients/partners, public authorities, riparians, non-governmental organizations and other stakeholders concerned by the general environmental issues.

(5) The management and personnel of CONPET S.A. respects the legal regulations in force, is aware of its responsibility towards the environment and joins forces towards the achievement of environmental performance.

(6) CONPET S.A. undertakes to remedy all the negative consequences of its activity that could not be avoided, concurrently with the initiation of programs to prevent similar risks.

(7) The management and personnel of CONPET SA maintain the ecological and clean operations along the entire supply chain, acting constantly to reduce waste and pollution emissions.

(8) CONPET SA management is concerned with education, awareness, personnel training in order to create an environmental organizational culture.

(9) Health and safety at work of our employees is one of the central pillars integrated in our human resources management policy. CONPET SA relies on the principle of prevention, offering its employees a safe and secure work environment, pursuant to the industry standards and the applicable laws and regulations.

(10) The management and personnel of CONPET S.A. monitors the compliance with the suppliers/ clients requirements, their perception regarding quality and the degree of satisfaction of their need in relation to the contractual clauses.

(11) The company carries out its contractual relations using honest and legal business practices and acts, through its employees, in the following directions:



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- a) working to the highest standards of professionalism and morality, in order to satisfy the interests of the company and the demands of the business partners;
- b) constant efforts to win and maintain the reputation of a trustworthy, upstanding and competent business partner;
- c) cultivating respect for all business partners;
- d) the relations with business partners are based on legal, effective and fair practices, with a view to establish lasting relationships;
- e) promoting ethical norms in relations with the business partners;
- f) company's employees will not seek to gain personal benefits using confidential information they are aware of or through inappropriate actions/behavior;
- g) searching for amicable solutions, through negotiation and mediation, in case of disputes arising during business relations;
- h) it is forbidden to obtain personal benefits through manipulation, confinement, using confidential information or any other financial unfair business practice;
- i) business relationships with business partners are conducted on a mutually respectful, fair and trustful basis.

### **Art.36 The Relationship of the Business Partners/Stakeholders with CONPET SA**

#### **Business integrity and Legal Requirements**

- (1) Suppliers, Customers or any other interested party shall not engage in any form in taking, bribing and/or providing any kind of incentive or payment to any CONPET SA employee, to the family or friends of CONPET SA employee or to any other representative of CONPET SA to obtain or maintain contracts with CONPET SA, in order to unfairly obtain an advantage or maintain a business interest with CONPET S.A.;
- (2) Conflicts of interest within the supplier/client's organization or in relation to CONPET SA must be avoided and disclosed if they affect the business relationship;
- (3) Suppliers/customers/other stakeholders of CONPET SA are prohibited to provide or offer gifts to employees of CONPET SA who could improperly influence or appear to reasonably influence the business decisions of CONPET SA, or attempt to gain an unfair advantage;
- (4) Suppliers, customers or any other stakeholder shall protect the confidential information of CONPET SA, and shall act to prevent misuse, theft, fraud or improper disclosure;
- (5) Suppliers/customers/other stakeholder must take all precautions regarding the manipulation, discussion or transmission of sensitive or confidential information that could affect CONPET SA, its employees, its customers, the business community or the general public;
- (6) Suppliers/customers/other stakeholder must process, store, transmit and share personal information in a manner compatible with applicable data privacy and information security laws;
- (7) Suppliers/customers/other stakeholder will use the personal information/data of CONPET SA employees, customers and contractors only for legitimate business purposes or under a contract with CONPET SA;
- (8) The Supplier/client/other interested party shall not create any separate transaction in relation to CONPET SA, shall not engage in any form of money laundering and shall not knowingly accept funds acquired by illicit means.
- (9) The Supplier/Client/other interested party shall not use any confidential information in its possession regarding CONPET SA to engage or support privileged transactions.
- (10) Suppliers shall comply with all applicable regulations in the supply of goods and services to CONPET SA.



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CONPET SA expects Suppliers/Customers/other stakeholders to implement systems and controls to promote compliance with applicable regulations and the principles set forth in this Code, including policies, procedures, training, risk assessments, discipline, monitoring mechanisms. They, in their turn, should also apply these or similar principles to subcontractors and suppliers with whom they work in the supply of goods and services to CONPET SA.

### **Human rights and Labor**

- (1) Suppliers/Customers/other stakeholders must maintain and promote fundamental human rights and refrain from the use of forced labor, comply with the minimum age limit for employment defined by national legislation or regulations, respect the legal rights of minorities, respect the right of employees to freedom of association and collective bargaining, in accordance with applicable law.
- (2) Suppliers/customers/other stakeholder shall be prohibited from using force, fraud or coercion to obtain manpower or services, engage in any form of human trafficking.
- (3) We expect suppliers/customers/other stakeholders to promote the diverse workforce and provide a job without discrimination, harassment or any other form of abuse, to create a work environment where employees and business partners feel valued and respected for their contributions, are not discriminated because of any characteristic protected by law, and are not subject to verbal, sexual or physical harassment or any kind of abuse.

### **Environmental, Health and Climate Protection**

- (1) We expect suppliers/customers/other stakeholders to continuously identify, assess and minimize the negative impact on the environment, climate, and biodiversity resulting from the activities they carry out. Our suppliers/customers must comply with applicable national and international environmental standards and regulations.
- (2) We encourage suppliers/customers/other stakeholders to operate effectively to continuously monitor and reduce their environmental footprint. We expect our partners to use natural resources in an environmentally friendly way.
- (3) Suppliers/customers/other stakeholders shall ensure the responsible handling of chemicals and hazardous substances regarding the protection of the environment and people. They must take all necessary precautions to ensure the handling, transfer, storage, use or recycling and safe disposal of waste.
- (4) We expect all suppliers/customers/other stakeholders to comply with applicable national and international standards and regulations in the field of occupational health and safety.

### **Art.37 The Relationship with the Community**

- (1) CONPET SA maintains relations with the local, national and multinational authorities based on total and active collaboration and transparency, which do not compromise the company's independence and economic objectives and observe the behavioral principles and the values of this code.
- (2) CONPET S.A. is involved in supporting corporate social responsibility projects, through the award of sponsorships in compliance with the provisions of Law no. 32/1994, thus supporting projects in areas such as education, learning, sport, scientific - fundamental and applied research, health and medical, artistic cultural, environmental, social and community protection, philanthropic and humanitarian actions, social assistance and services, protection of human rights etc.



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- (3) The acts of courtesy, leading to offering gifts to the foreign delegations invited in Romania on the expense of the Romanian party, during official meetings, shall be made by the Company Management, making use exclusively of resources from the protocol fund provided in the company's annual budget.
- (4) CONPET SA observes the professional independence of the journalists and media institutions.
- (5) CONPET SA collaborates with all the information and media means, without discrimination and by the mutual observance of the trade non-disclosure exigencies, in order to reply with promptitude, in a complete and transparent manner, to the needs for correct informing of the public, as well as to any other request for public information.
- (6) The information provided by the company must be complete in terms of content, transparent, clear and accurate, prepared in a manner accessible to all categories of public targeted by the company and to the strategic partners of the company, as to enable those to whom it is addressed, to make decisions being fully aware of it.
- (7) The persons tasked with discussing with mass-media representatives are: the members of the Board of Directors, the Director General and the persons they appoint to fulfill such duty.

## Chapter V - Clauses regarding the application of the Code of Ethics and Integrity

### Art.38 Implementation of the Code of Ethics and Integrity

- (1) The provisions of this Code of Ethics and Integrity are formally brought to the attention of the personnel, as follows:
  - a) for the existing personnel in the staff establishment plan, by the hierarchical leaders, on the date of its release;
  - b) for the new employees, by the Human Resources department, with attributions in this regard, before they start the activity
- (2) For all personnel, this code should become part of the agreement the employee has signed with CONPET S.A., regardless of its legal nature.
- (3) This code will be brought to the attention of the company's personnel via training, publication and dissemination.
- (4) Any change that occurs in the content of the Code of Ethics and Integrity is subject to personnel information procedure, as specified above.
- (5) The stakeholders (authorities, clients, suppliers etc) may consult the document on CONPET SA's webpage, Section Corporate Governance/Institutional Integrity.

### Art.39 Liability and sanctions

- (1) Failure to comply with the Code of Ethics and Integrity is considered a disciplinary offense and is sanctioned in accordance with the legal provisions and the internal regulations in force.
- (2) If there are notifications from inside or outside the organization regarding the violation of the Ethics and Integrity Code's provisions by the organization's personnel, administrative investigations will be conducted, according to the legislation in force, by the Disciplinary Commission.
- (3) Ethical problems/dilemmas arising within the organization can be brought to the attention of the person designated as an ethics and integrity advisor, who is responsible for providing advice and/or assistance to employees, regarding compliance with the rules of conduct in this Code of Ethics and Integrity.
- (4) Inappropriate conduct and adopted measures will be popularized among staff, except for personal data as defined by law.



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- (5) Compliance with the provisions of this Ethics and Integrity Code is a mandatory requirement for all employed personnel, managers and administrators of CONPET S.A., including delegated or seconded personnel within the organization.
- (6) The provisions of this Ethics and Integrity Code are supplemented by the applicable provisions of the normative acts in force.
- (7) The sanctions for non-compliance with the provisions of this code are provided by the mandate contracts concluded by the administrators, the Director General, the Economic Director and the Deputy Director General and those provided for employees in the company's Internal Regulations, which has as Annex the Regulation of the prior Disciplinary Inquiry.

#### **Art.40 Applicability**

- (1) The Code of Ethics and Integrity comes into force and is applied from the date of its approval by the Board of Directors of CONPET SA.
- (2) The Code of Ethics and Integrity can be revised whenever necessary, by a Working Group appointed for this purpose, by Decision of the Director General. Proposals for modification/completion may be made by any compartment or employee of CONPET SA, will be sent in writing to the Integrity Bureau that will inform the management. The Director-General shall decide on the need to revise the Code of Ethics and Integrity and to appoint the Working Group.
- (3) The revision, by the amendments formulated and agreed upon by the working group, is previously endorsed by the internal auditor, and, subsequent to this permit the revision is approved by the Board of Directors.
- (4) The revised Code of Ethics and Integrity shall be published by due care of the chairman of the BoD on the website of CONPET SA, in two days as of the date of the approval thereof.

#### **Art.41 Reference and related Documents**

The Code of Ethics and Integrity is developed in accordance with:

- (1) GEO 109/2011, regarding the corporate governance of public enterprises with subsequent amendments and additions;
- (2) OGSG (Order of the General Secretariat of the Government) no.600/2018 regarding the approval of the Internal Managerial Control Code of public entities;
- (3) GD no.1344/2007 - Rules and regulations for the organization and operation of disciplinary commissions, with amendments and additions;
- (4) Law no.53/ 2003, the Labor Code, with subsequent amendments and additions;
- (5) Law no.544/12.10.2001 republished, regarding free access to the information of public interest;
- (6) Law no. 287/17.07.2009 republished, regarding the Civil Code, subsequent amendments and additions;
- (7) EU Regulation no.679/27.04.2016 regarding the protection of natural persons in what concerns the personal data processing and the free circulation of these data and the abrogation of Directive no.95/46/CE (General Rules on data protection);
- (8) GD no.1269/2021 regarding the approval of the National Anti-Corruption Strategy 2021 - 2025 and its related documents;
- (9) The International Labor Organization Convention no.138 and no.18, ILO Convention no.29, no.105 and the Protocol from 2014 regarding forced labor, ILO Convention no.87 and no.98, ILO Convention no.135.
- (10) Law No.24/2017 regarding the issuers of financial instruments and market operations, republished, subsequent amendments and additions;



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- (11) ASF Regulation no.5/2018 regarding issuers and operations with securities on issuers of financial instruments and market operations;
- (12) Organizational and Operating Regulation of CONPET SA;
- (13) Internal Regulation of CONPET SA;
- (14) Collective Labor Agreement within CONPET SA;
- (15) SR ISO 37001:2017 Anti-bribery management systems. Requirements with user guide;
- (16) SR ISO 26000:2021 Guidelines on social responsibility;
- (17) Corporate Social Responsibility Policy of CONPET S.A. no.11398/31.03.2022;
- (18) GEO no.66/29 June, 2011 regarding the prevention, detection and sanctioning of irregularities arising in the obtaining and use of European funds and/or related national public funds with subsequent amendments and additions.
- (19) Internal procurement procedural rules within CONPET SA.

**Developer** - The working group set up to revise/update the Ethics and Integrity Code, based on the Decision of the Director General 205/10.04.2025, as per the requirements of OGSG 600 /2018 and GEO no.109 /2011, with subsequent amendments and additions, as well as in correlation with the provisions of GD no.1269 /2021 regarding the approval of the National Anti-Corruption Strategy for the period between 2021-2025.

**DIRECTOR GENERAL,**  
Eng. Dorin TUDORA

**HEAD OF INTERNAL PUBLIC AUDIT,**  
Econ. Manuela STOICA



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