Corruption prevention policy

Approved by the Board of Directors on 2017-07-28
Company’s position

Envisaging to prevent conducts which may constitute corruption in the geographies where it operates:

- Galp does not allow its employees or third parties acting on its behalf to engage in the following conducts:
  
  - offering, promising or authorizing undue benefits to a person, public entity or its related party, including facilitation payments, in order to obtain financial or non-financial benefits for themselves, for Galp or for a third party (active corruption);
  
  - accepting benefits for themselves, for a third party or for Galp, when such acceptance could harm theirs or Galp’s current or future independence and impartiality in relation to the offeror or its related party (passive corruption);
  
  - using donations or sponsorships as a mean for unlawful influence or pressure in relation to any decision beneficial to Galp or its related party, always maintaining social adequacy with respect to the market area and countries in which Galp operates.

- Galp undertakes to:
  
  - promote the effectiveness of the mechanisms for reporting irregularities implemented at Galp;
  
  - develop appropriate processes and procedures to assess and mitigate the risk of corruption, namely the risk that partners, transactions or commercial/institutional relations may bear to Galp;
  
  - promote among its stakeholders measures to prevent corruption and to reinforce the principles and values set out in Galp’s Code of Ethics and Conduct in this field.

Final statement

Galp is committed to monitor the evolution of best practices on the prevention of corruption risk in order to achieve continuous improvement.