

Procedure on Reporting Irregularities – Ethics Line**Approved by the Supervisory Board at the meeting of 3.12.2015**

1. INTRODUCTION

Galp Energia, SGPS, SA (hereinafter "Galp") bases its business on principles of loyalty, correctness, honesty, transparency and integrity, with due regard for the law and best international practices, lending particular attention to the establishment of in-house rules of conduct to implement these principles and to the training of its personnel in these matters at all Group companies.

The adoption of the new Code of Ethics and Conduct of Galp (hereinafter "Code of Ethics") at a meeting of the Board of Directors held on July 24, 2015, and its subsequent approval by the board of directors of the Subsidiaries, as defined hereunder, constitute one of the main measures for the implementation of the corporate culture of the Galp Group.

On the other hand, as the governing body responsible for monitoring the Company, it is incumbent on the Supervisory Board to receive reports of irregularities lodged by Galp personnel and other stakeholders, as well as to record in writing their accusations and the checks, inspections and measures taken and the procedures defined with a view to the correcting any irregularities encountered.

In view of the foregoing and of the subsequent establishment of the Galp Ethics and Conduct Committee (hereinafter "ECC") by the respective Supervisory Board at the proposal of the Executive Committee, the Galp Group's Irregularities Reporting Policy must be updated, now renamed the Irregularities Reporting Procedure – Ethics Line.

This Galp Group Procedure on Reporting Irregularities – Ethics Line aims to implement the provisions of the Code of Ethics, in line with the recommendations of the CMVM corporate governance code regarding the internal-control duties of the supervisory body.

2. PURPOSE

This Procedure on Reporting Irregularities aims to allow any stakeholder related to Galp, in particular personnel, members of governing bodies, shareholders, investors, customers, suppliers or business partners, to inform the Supervisory Board, by means of communications addressed to the ECC, of any knowledge or reasonable suspicion of

the occurrence of any irregularities or breaches of the Code of Ethics, or of the rules that develop or deal with the matters listed therein in the fields of accounting, internal accounting controls, auditing, the fight against corruption and banking and financial crime.

3. SCOPE OF APPLICATION

- 3.1.** For the purposes of this Procedure, all acts or omissions, intentional or seriously negligent, attributed to personnel or members of governing bodies of Galp and its Subsidiaries, in the areas of accounting, internal accounting controls, auditing, the fight against corruption and banking and financial crime are considered irregularities.
- 3.2.** This Procedure applies to Galp and all Subsidiary Companies. For the purposes of this Procedure, Subsidiaries are deemed to be those in which Galp directly or indirectly holds 50% or more of the share capital or in which it exercises control or the management mandate, in all geographies where the Group operates.
- 3.3.** The representatives appointed by Galp to its Subsidiaries shall ensure the adoption of this Procedure by those companies.

4. ORGANIC COMPETENCE

Within the scope of its powers, the Supervisory Board of Galp acts through the ECC, whose powers, duties, and functioning are governed by its own regulations.

5. RULES OF ACTION

- 5.1.** The security of the information received on irregularities and of the respective records is ensured by Galp's internal rules, in accordance with applicable legislation on data protection and information security.
- 5.2.** The processing of personal data within the scope of the Irregularities Reporting Procedure is carried out under Authorisation n° 7924/2015 conferred by the National Data Protection Commission (CNPD), the conditions and limits of which are set in that Authorisation and in CNPD Resolution n° 765/2009 or such

authorisation or resolution as may come to replace them.

- 5.3.** Information provided under this Procedure shall be used solely for the purposes laid down herein.
- 5.4.** The person named in the accusation is entitled to information about the entity responsible, the facts reported and the purpose of the treatment, as well right of access to the data concerning him or her, and to request their amendment or deletion should they be inaccurate or incomplete or misconceptions.
- 5.5.** Galp and its Subsidiaries warrant that the entities reporting the performance or suspicion of any irregularity or provide information in connection with the investigation of reports of irregularities submitted shall not be subject to any retaliation, intimidation or discrimination, including disciplinary action or retention or suspension of payments.
- 5.6.** Misuse or use in bad faith of the irregularities reporting mechanism may give rise to disciplinary or legal proceedings, as applicable, should the conduct so warrant as set forth in the Code of Ethics.
- 5.7.** Complaints submitted regarding the quality of products or services provided shall not be considered.
- 5.8.** In the event that the process is dropped out of hand, the Supervisory Board shall ensure the destruction of the information reported and collected. The personal data constituting the object of the accusation shall immediately be destroyed if seen to be inaccurate or useless. Where no disciplinary or legal proceedings are called for, the data shall be destroyed within six months of the conclusion of the process.
- 5.9.** In the event of disciplinary or legal proceedings, the data shall be kept during a maximum of six months following the end of such proceedings.

6. REPORTING IRREGULARITIES

- 6.1.** Irregularities reported by any stakeholder must be made in writing and sent by email or letter addressed to the ECC to the following addresses:

Email address: opentalk@galpenergia.com

Postal Address: Comissão de Ética e Conduta da Galp

Edifício Galp Energia, Torre A

Rua Tomás da Fonseca

1600-209 Lisboa

6.2. Reports of irregularities must:

- a)** Use a format that ensures its confidentiality until it is received by the ECC;
- b)** Identify the author, whose identity will be kept confidential;
- c)** Contain a description of all the facts and information that may support the appraisal of the irregularity reported, or in the case of a suggestion, concrete elements that may prevent or reduce the likelihood of an irregularity.

6.3. For the purposes of this Procedure, contact with the ECC shall be made using communication channels referred to above, without prejudice to the possibility of the ECC requesting face-to-face contacts as required to determine the information received.

6.4. The member of the personnel who has reported irregularities is obliged to provide the ECC with such information as he/he may have and shall co-operate in the respective fact-finding process.

7. CONFIDENTIALITY

7.1. Each irregularity-reporting process shall be treated as confidential, all persons having access to the information contained in alleged irregularities processes undertaking to keep it confidential.

7.2. Because of its confidentiality only members of the Supervisory Board, of the ECC and, on the basis of strict necessity, of the Executive Board and employees or outside consultants expressly assigned to support the work of the ECC have access to the irregularities reporting processes.

8. FINAL PROVISIONS

8.1. Without prejudice to the provisions of the Code of Ethics, this Procedure on Reporting Irregularities is of a voluntary nature and therefore failure to make

use of it entails no penalties.

- 8.2.** This Procedure on Reporting Irregularities revokes the Policy on Reporting Irregularities approved by the Supervisory Board on November 7, 2013.
- 8.3.** This Procedure on Reporting Irregularities was approved at a meeting of the Supervisory Board on December 3, 2015, and shall be disclosed internally to all Galp and Subsidiary Companies employees through the normal communication channels, as well as externally via the official Galp website.