

CODE OF CONDUCT

Tecpetrol

Dear Colleague,

Eighteen years after its introduction in 2006, the Tecpetrol Code of Conduct remains a document that expresses the fundamental vision and values of the Company with respect to ethical behavior and transparency, and what we expect from everyone working for, and with, Tecpetrol.

As the world changes and our company expands the frontiers of its business, we are constantly facing new complex realities and challenges and it is important that our organization responds effectively and in accordance with its fundamental management values.

Neither this nor any other code can address every situation we could face or be a substitute for applying common sense and good judgment. When in doubt, it will always be required to ask for advice from your direct supervisor, Internal Audit, the Business Conduct Compliance Officer or Tecpetrol Legal Services, as appropriate.

The reputation of our business reflects the actions of each of us every day. It is a source of value for our clients, our partners and the communities where we operate, and one of the greatest assets we have. I count on each of you to join our drive to promote transparency and integrity throughout our operations and reinforce the sustainability of our company.

March 2024

Carlos Ormachea
President



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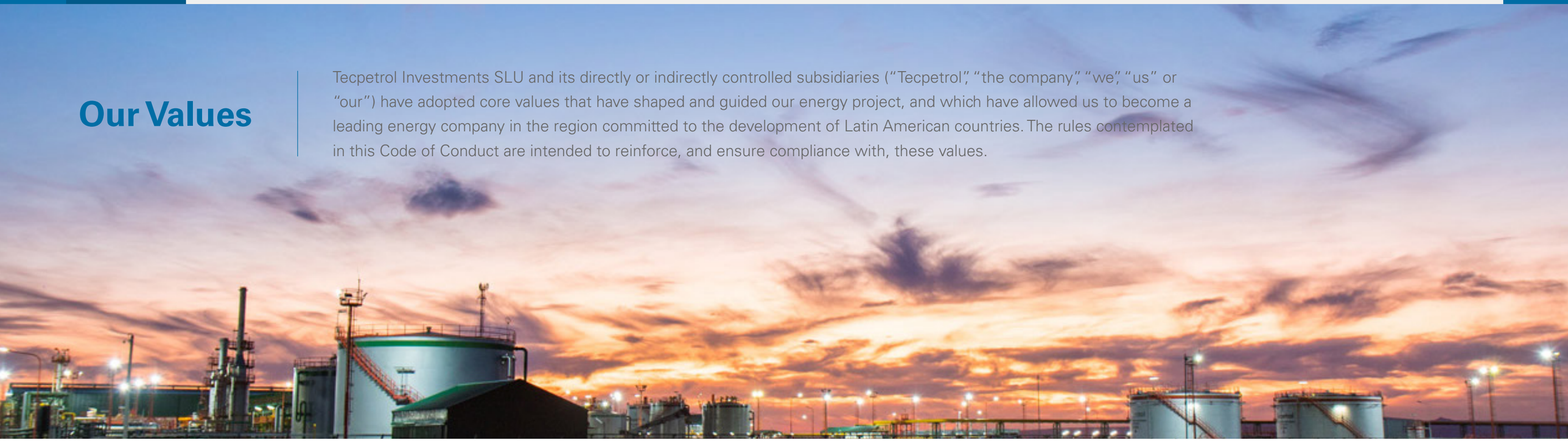
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Our Values

Tecpetrol Investments SLU and its directly or indirectly controlled subsidiaries ("Tecpetrol", "the company", "we", "us" or "our") have adopted core values that have shaped and guided our energy project, and which have allowed us to become a leading energy company in the region committed to the development of Latin American countries. The rules contemplated in this Code of Conduct are intended to reinforce, and ensure compliance with, these values.



Health and Safety

Nothing is more important to Tecpetrol than the health and safety of all those working with the company.
Our priority is to provide our employees a safe workplace, promoting their wellbeing and a healthy lifestyle.

Environment

We are committed to developing a business that is sustainable over the long term, minimizing the environmental footprint throughout our operations, developing new and clean sources of energy and setting an example in our communities.

Transparency

Transparency in management and communications is a fundamental value in our relationship with our stakeholders, customers, employees, suppliers, and the communities of which we are a part. We are committed to building a culture of transparency and integrity in everything we do.

Quality

Excellence and quality in our products, services and processes are our principal competitive advantage. We are focused on the continuous improvement of our operations and processes and on applying outstanding technologies for the energy industry.

People and Diversity

Our people are at the heart of our energy projects and the foundation of our achievements. We aim to provide them opportunities for development and fulfilling their potential, while promoting diversity, equity and inclusion, and rejecting any form of discrimination based on gender, sexual orientation, ethnic origin, color, age, religion or political belief.

Community

The development and inclusive growth of the communities where we have our operations is integral to the success of our energy projects. Our community activities focus on support for education and opportunities based on merit, with technical education seen as an engine for growth, transformation and social mobility.



Who Must Comply With This Code of Conduct

This Code of Conduct defines principles and standards of integrity and transparency, which must be complied with by all directors, officers and employees at all levels within Tecpetrol.

Within the labor relationship established by each Tecpetrol´s subsidiary, all employees must abide by the provisions of this Code, Tecpetrol's corporate policies and procedures and all applicable laws, rules and regulations, with a personal commitment to honesty, loyalty and transparency in all work-related actions.

As far as the nature of each relationship permits, all principles and standards contained in this Code also apply to contractors, subcontractors, suppliers, associated persons, or anyone who performs services for or on behalf of Tecpetrol, whether paid or unpaid, all of whom might be capable of engaging in unlawful or unethical behavior for or on behalf of Tecpetrol.

Tecpetrol will take appropriate actions to ensure that every joint venture company, consortium or similar association in which Tecpetrol participates, adopts principles and standards consistent with those reflected in this Code.

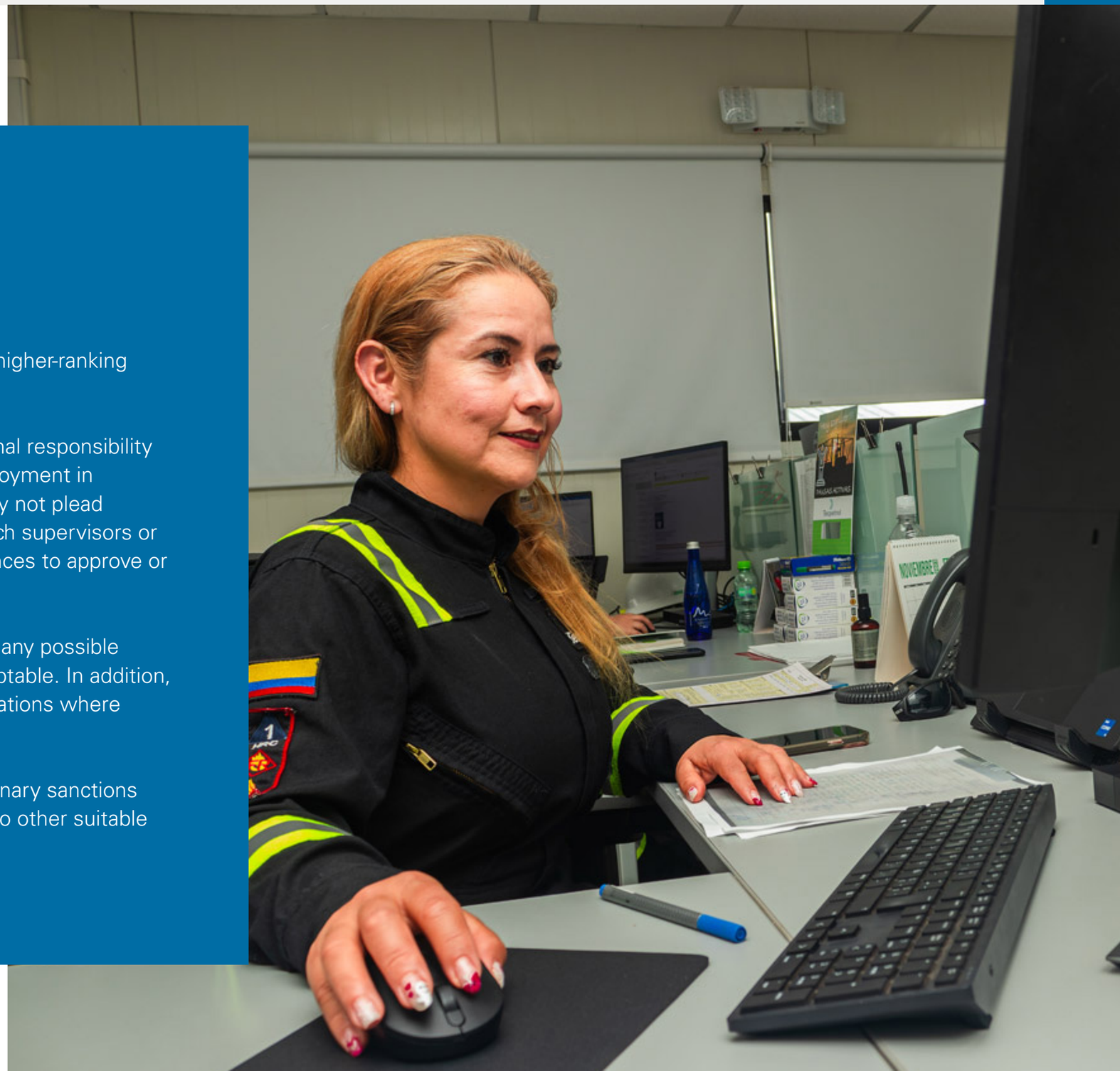
Compliance With This Code

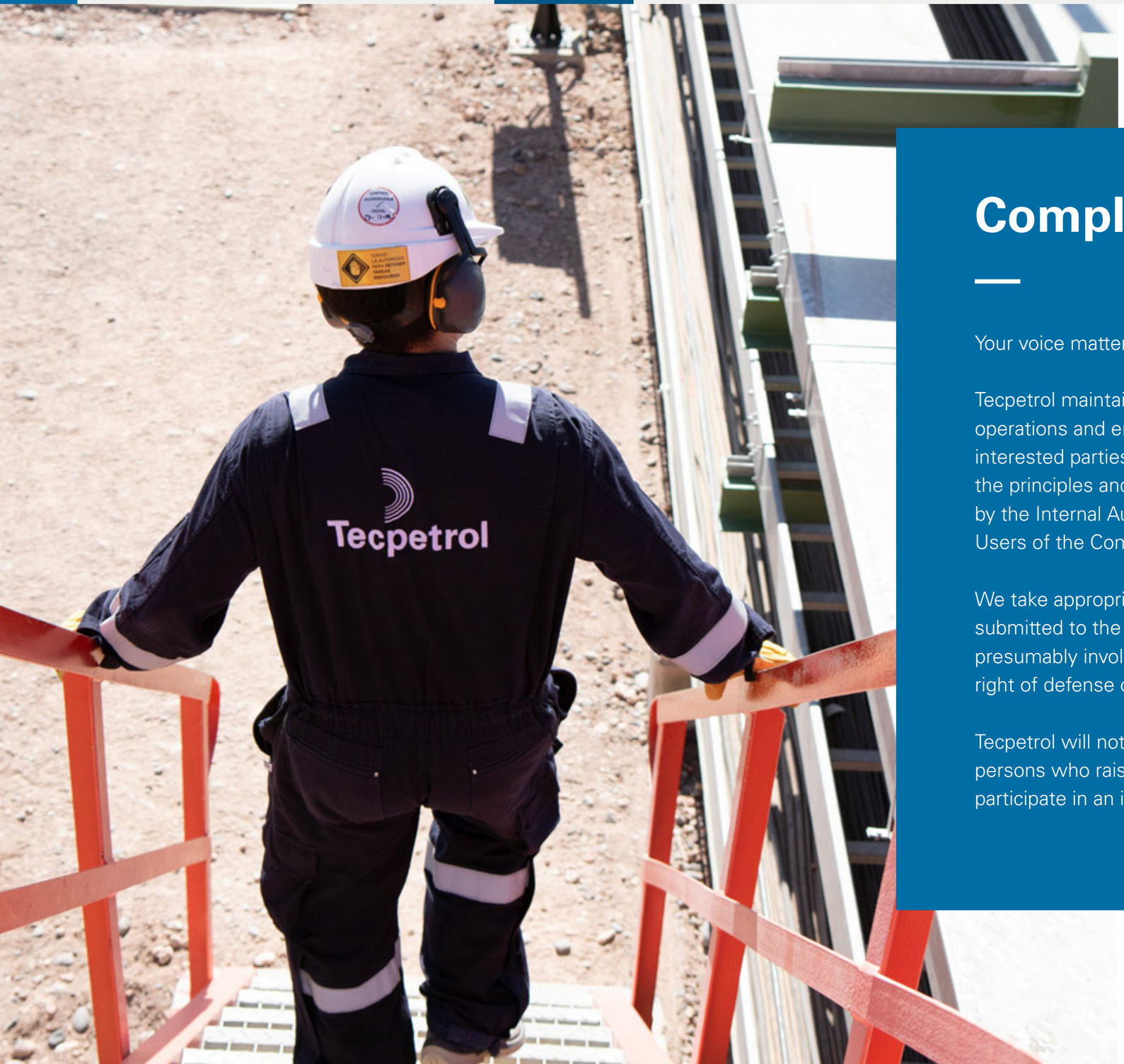
The provisions of this Code prevail over obedience to higher-ranking officers.

Compliance with this Code is the exclusive and personal responsibility of every employee and a condition for continued employment in Tecpetrol. In the event of any violation, employees may not plead ignorance or obedience to any supervisors, and no such supervisors or any other officers are authorized under any circumstances to approve or tolerate violations to this Code.

Employees must adopt a proactive attitude and report any possible deviations. Passive tolerance for violations is not acceptable. In addition, every employee must cooperate with internal investigations where required.

Depending on the seriousness of the violation, disciplinary sanctions may lead to dismissal of the involved employees and to other suitable legal actions promoted even after dismissal.





Compliance Line

Your voice matters.

Tecpetrol maintains a Compliance Line in all countries in which we conduct operations and encourages employees, customers, suppliers and all other interested parties to report, on a confidential basis, any conduct contrary to the principles and standards of this Code. The Compliance Line is managed by the Internal Audit Department.
Users of the Compliance Line are allowed to file anonymous reports.

We take appropriate measures to ensure strict confidentiality of any reports submitted to the Compliance Line, a fair treatment of any individuals presumably involved in violations of this Code, and a timely exercise of the right of defense of any such individuals.

Tecpetrol will not tolerate any punitive actions or other retaliation against any persons who raise any issues, report any potential violation of this Code or participate in an investigation.

Compliance With the Law

All employees must comply with all laws, rules and regulations applicable to Tecpetrol or its business. Employees should be aware that, because of Tecpetrol's regional operations, a conduct that is illegal or inappropriate in one country can subject us or our employees to legal liability not only in the country where the misconduct occurs, but potentially in other countries.

From time to time, Tecpetrol issues policies, procedures and guidelines to achieve its business purposes, follow or promote best practices and comply with the laws, rules and regulations of the various jurisdictions in which it conducts business. While we make every effort to communicate such policies, procedures and guidelines effectively, employees are expected to familiarize themselves with them and to seek guidance whenever appropriate.

Corporate Accountability and Transparent Management

Employees should take all necessary steps to ensure that each action and decision that is adopted satisfies all these conditions:

- It is based on information that accurately reflects reality;
- It has been approved by the appropriate level as set forth in the applicable policy or procedure;
- It is based on a reasonable analysis of the risks involved;
- It places the best interests of Tecpetrol ahead of personal interests; and
- It leaves records of its rationale.

Good Judgement and Common Sense

Neither this Code nor any set of principles can address every situation or be a substitute for applying common sense and good judgment. The following questions should be considered before making any work-related decision:

- Does the proposed action comply with applicable laws and regulations and Tecpetrol's corporate policies and procedures?
- Does the proposed action comply with the letter and spirit of this Code?
- Can the decision be justified and perceived as the most appropriate course of action?
- Could the proposed action, if made public, compromise Tecpetrol or be harmful to its reputation or its standing in the community?

When in doubt on how to comply with, interpret, explain to others or convey the principles and standards of this Code, seek advice from your direct supervisor, the relevant officer, the Internal Audit Department or Tecpetrol Legal Services.

All Tecpetrol employees are expected to:

01. Learn about and comply with all laws, rules, regulations and Tecpetrol´s policies and procedures that apply to their job;

02. Seek prompt advice and guidance if unsure about the course of action to take and encourage others to do the same;

03. Be alert to and report any issues or potential violations through appropriate reporting channels;

04. Never judge or retaliate in any way against an individual who raises an issue, reports a violation or participates in an investigation.



People and Environment

Tecpetrol believes that sustaining a culture of safety, promoting the employees' well-being, fostering the protection of the environment, and procuring consistent growth and development of the local communities, are all key to its longstanding success.

Health and Safety

Tecpetrol promotes a culture of safety and is committed to a substantial reduction of health and safety risks in operations and strives to prevent all accidents and work-related illnesses.

Everyone at Tecpetrol is accountable to act proactively to eliminate hazards, reduce risks and identify opportunities for improvement, and encourage an open communication with all our people and interested parties.

Employees are expected to diligently comply, and inspire others to comply, with all health and safety applicable law and corporate policies, procedures and operating practices. They must set a good example and report any concern or event of non-compliance that may compromise the health or safety of persons or operations.

When in doubt about how to address a situation, deal with an unexpected event or comply with applicable corporate policies, employees must seek immediate advice from their supervisory levels as to the proper protocol or other course of action to follow.





Workplace Environment

Tecpetrol promotes a healthy and respectful workplace environment, with utmost respect for all laws governing human and labor rights.

We support the elimination of all forms of discrimination, illegal, forced or compulsory labor, slavery or servitude, in particular child labor. Discrimination, illegal, forced or compulsory labor, slavery or servitude will not be tolerated at Tecpetrol. All Tecpetrol's suppliers and contractors are expected to comply with these principles.

All individuals may apply for a position within Tecpetrol in accordance with the applicable job requirements and merit criteria, without arbitrary discrimination. Discrimination by reasons of gender, sexual orientation or preferences, ethnic origin, color, age, religion or political opinion or beliefs is strictly prohibited.

Tecpetrol will not tolerate any form of abuse, harassment, coercion or bullying, whether sexual, physical, psychological, or otherwise.

Employees at all levels must treat others with respect and dignity and are expected to cooperate to maintain an ethical and respectful workplace environment should there be personal differences.

Environment

Tecpetrol promotes the protection of the environment and strives to minimize any negative impact on it.

We recognize that climate change may present significant risks to society in general and to our business in particular.

As a result, Tecpetrol is committed, and expects all employees to be committed, to reducing the environmental footprint of its operations through an efficient use of resources, transportation planning, reduction of waste and emissions and careful handling of hazardous substances.

We aim at achieving continuous improvement in environmental performance, concentrating our efforts on areas of greatest impact at our field and office sites.

Tecpetrol also seeks to comply and expects all employees to comply with all applicable environmental laws and regulations. Where none exists, employees must set themselves appropriately high standards.



Relations With the Community

The sustainability of Tecpetrol's project in the region has a deep connection with the growth and development of the local communities of the countries in which we conduct operations.

Employees must be respectful of the identity, cultural heritage and traditions of local communities and must seek to maintain transparent relationships with the people living in such communities.

Similarly, employees are expected to be diligent and act in a professional manner when dealing with the different realities and the complex and potentially challenging situations that each community may have.



Use and Protection of Assets

The careful and responsible use of Tecpetrol's assets is essential for the company to conduct its business and achieve its objectives.

Use of Assets

Tecpetrol's assets must be used exclusively for their intended purposes and by duly authorized persons. Tecpetrol will not tolerate any misuse of assets for personal benefit.

Every employee is responsible for protecting Tecpetrol's property and other tangible and intangible assets against any unauthorized use, breach of trust, damage or loss, whether through negligent or willful actions.





Intellectual Property Rights

Proprietary rights over any knowledge developed in the workplace environment belong to Tecpetrol, which upholds its right to exploit such knowledge in the manner and at the time it considers most suitable, in accordance with applicable law.

Intellectual property owned by Tecpetrol includes patents, trademarks, copyrights, drawings, software, know how, ideas, inventions, procedures, methodologies, courses, reports, or any other proprietary information developed in or contracted by Tecpetrol.

Employees are responsible for identifying, protecting, and defending Tecpetrol's intellectual property and for respecting third parties' intellectual property, whenever made available for Tecpetrol's own use.

Use of Technological Resources

Employees may not use Tecpetrol's information technology resources (including among others, software, apps, electronic message systems, instant messaging platforms, hardware and mobile devices) for purposes other than those authorized by Tecpetrol.

Using or connecting into Tecpetrol's technological environment any information technology resources that do not comply with Tecpetrol's standards is not permitted, unless authorized by the appropriate technical area.

Employees must refrain from bringing, downloading or using illegal copies of software, and from violating licensing agreements or doing anything that may subject Tecpetrol to liability.

To the extent permitted by applicable law, Tecpetrol, acting through the Internal Audit Department, is entitled to monitor, at any time and without any notice, the use of information technology resources, and to access, review, copy or retrieve, any files, documents, records, databases, electronic messages, internet activity and any other information (including both business and personal) managed through Tecpetrol's information technology resources.

Users of Tecpetrol's information technology resources must not have any expectations of privacy over any information or communications generated or transmitted through, or stored in, Tecpetrol's information technology resources. If in reviewing data for legitimate corporate purposes Tecpetrol comes across information of a private nature, it will use reasonable efforts to preserve the privacy of such information.

Employees should not use personal devices or other personal technological resources in connection with Tecpetrol's business or corporate purposes. Notwithstanding the foregoing, employees must be aware that their personal devices or resources may be subject to inspection by Tecpetrol or governmental authorities if such devices or resources are, nonetheless, used for business or corporate purposes. In such cases, privacy expectations may be severely limited, and employees will be expected to grant access to their personal devices or other resources.

Information and data stored on Tecpetrol's premises and information technology resources belong to Tecpetrol and, accordingly, Tecpetrol may choose to provide this information to regulators or other third parties if it deems it necessary or advisable.





Protection of Information

Tecpetrol respects the privacy of its employees and of those third parties with which it conducts business and promotes the protection, proper use and careful disclosure of information.



Data Privacy

Tecpetrol requires, obtains and uses personal information only to the extent necessary for the effective management of its business operations and in strict compliance with applicable data privacy laws and regulations.

We request our employees to always protect and keep private their own personal information and the personal information of other employees and third parties.

The above requirements and commitment do not limit in any way Tecpetrol's authority to investigate wrongdoings by employees and third parties or to review personal data to comply with applicable law or in accordance with applicable industry practices.

Confidentiality of Information

Employees must keep confidential all information to which they have access in the performance of their work for Tecpetrol, even if such information is not classified as confidential or does not belong or pertain to Tecpetrol, and regardless of the manner in which it is obtained or communicated.

All such information must be treated carefully and protected to avoid improper or inadvertent disclosure. All such information must never be shared with any person who does not need to know such information to perform his or her work or to provide a service to Tecpetrol. Even within Tecpetrol, information must be shared only on a need-to-know basis.

Personnel must follow all security procedures and be alert to any circumstances that could lead to loss, misuse or theft of information.

In case of doubt, all information must be presumed confidential and treated accordingly.

The obligation not to disclose confidential information will survive for the terms provided in applicable law, company policies or contractual arrangements.

Employees must protect the confidentiality of information even after the employment relationship ends, and may not use the information for personal purposes or to benefit another employer, outside business or for or in connection with inventions not owned or sponsored by Tecpetrol.





Security of Information

Only authorized persons may have access to Tecpetrol's information in any format (physical, magnetic, electronic, optical, etc.). Any such information may only be used for the purposes and periods specified in the authorization.

Employees are directly responsible for taking the necessary steps to safeguard Tecpetrol's information from damage, misuse or loss and to ensure its safe custody for the period established in company´s policies and procedures. Employees must familiarize themselves and comply with specific procedures and protocols on security, information management and cybersecurity incidents, as failure to do so may have severe impact for Tecpetrol.

Passwords and other authentication methods may only be known and used by their owners and never disclosed to or shared with third parties.

Employees must be vigilant of cyberattacks (including any manner of malicious activity), immediately report any incidents, and avoid any actions that may compromise Tecpetrol's ability to contain the incident, to respond effectively to authorities' or third parties' requests, or to apply corrective and remedial measures in due time in accordance with Tecpetrol's policies and procedures.

Insider Trading

Insider trading and information tipping are strictly forbidden. No employee may purchase, sell or otherwise trade in securities of Tecpetrol or any company that is or may be engaged in a trade or business with Tecpetrol while in possession of material nonpublic information.

In addition, employees may not disclose, directly or indirectly, to third parties any material nonpublic information concerning Tecpetrol or any other publicly traded company with which Tecpetrol is doing or considering doing business. Beyond disciplinary action, and within the applicable legal framework, a violation of these guidelines may lead to further legal action against the involved employee.

Employees investing in stocks must know the regulations restricting their capacity to negotiate in securities.





Public Communications

All institutional communications and statements to be made to the public on behalf of Tecpetrol, or involving any activity, achievement or event related to Tecpetrol, must be made exclusively by authorized persons.

Any request for information concerning Tecpetrol, whether made by investors, customers, partners or other stakeholders, must be answered appropriately and in due time by concerned areas.

Employees must be aware and procure early involvement of relevant areas (including, without limitation, the Investor Relations, Communications or Compliance departments, Tecpetrol Legal Services, and the Business Conduct Compliance Officer, as applicable) before answering or committing an answer to any request of information.

Private use of social media, when involving or affecting Tecpetrol in any manner, must be respectful of the rules contemplated in this Code and must never compromise Tecpetrol's reputation or business interests, jeopardize the confidentiality of Tecpetrol's information or otherwise lead to confusion between the opinion of an employee and the institutional position of Tecpetrol.

Employees are expected to exercise good judgement when deciding to use social media in a manner that, even with good intentions, may affect or involve Tecpetrol.

Business Integrity and Compliance

Honesty, integrity and transparency are essential to Tecpetrol's way of conducting business. Tecpetrol competes fairly based on the excellence of its operations. All forms of corruption are forbidden.



Fair, Honest and Transparent Competition

Tecpetrol is committed to the values of fair, honest and transparent competition.

Competition and antitrust laws around the world are aimed at prohibiting unreasonable restraints of trade and preserving competition. Examples of competition/ antitrust violations include price fixing, bid rigging, market or customer allocation and abuse of dominant position. The penalties for breaching competition and antitrust laws are severe. In addition to material fines and other penalties, individuals found guilty of the most serious offences can face imprisonment.

Tecpetrol strives to strictly observe the competition and antitrust laws of all countries in which it does business.





Bribery Prohibition

Tecpetrol will not allow, under any circumstances, the offering or receiving of bribes or any other form of illegal or improper payments.

While most countries have laws that make it illegal to engage in bribery, some of these laws criminalize not only bribery acts committed within the country's territory but also acts of bribery taking place abroad. A breach of any of these laws is a serious offence which can result in fines for Tecpetrol and imprisonment for individuals.

Employees must not give anything of value, including cash, cash equivalents, advantages, favours or courtesies, that is or could be construed as: (1) intending to influence the decision or performance of a public official or any other person or entity; (2) intending to obtain or secure any business, contract or advantage to Tecpetrol or (3) a violation of any applicable law.

The grant of any commissions, discounts, credits or bonuses and any other commercial incentive must be performed in accordance with existing laws, rules and regulations and officially granted, upon a written agreement, to legally recognized organizations with the corresponding supporting documentation. Commercial incentives must be consistent with applicable law and market practices and must be approved, provided and recorded in accordance with Tecpetrol's policies and procedures.

Tecpetrol will not allow the use of representatives, intermediaries, agents, consultants, subsidiaries, joint venture companies or other third parties to give, or promise to give, anything of value to anyone on behalf of Tecpetrol to circumvent the rules contemplated in this Code.

Employees should exercise care in dealings with public officials, as well as the employees or representatives of private companies to avoid even the suggestion of impropriety.
The term "public officials" should be interpreted broadly and includes employees or representatives of governments, legislature, or the judiciary, and their respective agencies or offices; employees or representatives of government-controlled or government-operated entities; officers of a political party or candidates to a public function; and any person acting for or on behalf or representing any government, or public international organization.

We strive to work with suppliers, agents, business partners, and other third parties that share our commitment to doing business ethically and in compliance with the principles of this Code.

Gifts and Entertainment

Promising, giving and receiving gifts, meals and entertainment can be a part of building business relationships. However, no Tecpetrol employee, nor any person who performs services for or on behalf of Tecpetrol, should offer, promise, give, request, agree to receive or accept excessive or inappropriate invitations, gifts, meals, or entertainment that could create or imply improper influence or obligate any recipient or that could be construed by an impartial observer as aimed at providing or obtaining undue advantages.

In all cases, no meals, gifts, travel or entertainment may be promised, given to, paid for, or accepted, directly or indirectly, without complying with applicable policies and procedures. Under no circumstances may cash or goods easily converted into cash be given or accepted.





Interactions With Public Officials. Political Contributions

Interactions with and relations with public officials on behalf of Tecpetrol are restricted and may be subject to the fulfilment of certain requirements, either contemplated in applicable law or in Tecpetrol's policies and procedures.

On behalf of Tecpetrol, employees are not authorized to support any political party; or to participate in electoral campaigns; or to take part in religious, ethnic, political or interstate conflicts.

Political contributions are prohibited in many jurisdictions; even where legal and justified, no political contribution may be performed by Tecpetrol or on its behalf without first complying with the applicable company policies and procedures and obtaining appropriate authorizations.

Internal Controls and Conflicts of Interest

A robust internal control system, accurate books and records, and a proper and timely disclosure of conflicts of interest are fundamental to Tecpetrol's sustainable progress and development.



Internal Control Environment

Tecpetrol encourages, at every level of its organization, a positive attitude towards internal control and a control-oriented mentality.

Internal controls are aimed at ensuring consistent compliance with applicable laws, rules and regulations, with this Code and with Tecpetrol's policies and procedures, protecting corporate assets, efficiently managing operations, providing precise and complete information, and preventing illegal conduct.

Management is the main responsible for building an efficient internal control system. Employees at all levels of the organization, in their respective functions, are responsible for abiding by and ensuring compliance with established controls and for identifying and addressing any weaknesses or failures that may affect such controls.





Accurate Records and Reporting

All employees, in their respective functions, are responsible for properly reflecting transactions on Tecpetrol's books and records so that Tecpetrol may properly comply with its financial and non-financial reporting obligations.

Tecpetrol believes that books and records accuracy is key for the decision-making process and a transparent relationship with its stakeholders. The term "records" is broad, including virtually any form of information created, transmitted, stored or processed in any manner by Tecpetrol.

Tecpetrol's books and records must reflect transactions in conformity with accepted accounting and other applicable standards. No misrepresentation, concealment, falsification, circumvention or other deliberate acts resulting in inaccurate books and records will be tolerated.

Conflicts of Interest and Non-Competition

Tecpetrol expects its employees to act fairly, loyally and honestly at all times, always in accordance with Tecpetrol's commercial purposes and core values.

In their relationships or dealings with third parties and other employees, employees must prioritize in all cases the interests of Tecpetrol over any situation that may lead to a real or potential personal benefit, for themselves or any of their relatives, closely related persons or associates.

Conflicts of interest must be fully disclosed in writing as required by Tecpetrol's policies and procedures. A real or potential conflict of interest is deemed to exist when a relationship between the employee and a third party might affect the interests of Tecpetrol or its stakeholders.

Employees must not compete with Tecpetrol or otherwise engage, directly or indirectly, in any of the commercial activities carried out by Tecpetrol, including manufacturing, selling products or providing services that are similar to, or that are substitute for, products or services offered by Tecpetrol.





Implementation of This Code

The President of Tecpetrol is the top-level decision-maker regarding the implementation of this Code.

The Internal Audit Department will address any question or concern relating to the implementation or interpretation of this Code that cannot be satisfactorily resolved at the usual supervisory levels.

Tecpetrol's Human Resources Department will implement procedures to ensure full acknowledgement and training of this Code.

Tecpetrol's management will take necessary measures to ensure that all Tecpetrol's employees, all suppliers, subcontractors, commercial and non-commercial representatives, and consultants, and anyone who performs services for or on behalf of Tecpetrol know, understand and apply the provisions of this Code. Tecpetrol's employees requiring further information on this Code than that provided by their supervisors may contact the Internal Audit Department by e-mail at auditoria_responde@tecpetrol.com.

Validity

This revised version of this Code is effective as from June 1, 2024, and, as from that date, shall replace and supersede in its entirety the Code of Conduct in force since June 1, 2018. Tecpetrol Legal Services may postpone or suspend its effectiveness in those jurisdictions where adoption and enforcement of this revised Code requires approval by a competent governmental authority.

Tecpetrol

www.tecpetrol.com