

PRELIMINARY

Scope

This questionnaire seeks to generate a profile of all those interested in being part of the panel of suppliers for the operations of Maurel & Prom in Venezuela ("M&P") that will allow us to perform a risk analysis and prevent acts of corruption and other related practices, determine legal compliance in the framework of applicable local and foreign regulations, as well as in the set of sanctions imposed that may pose a risk to M&P. In this sense, we need to have the information requested in this questionnaire to assess whether it is appropriate to initiate, continue or conclude business relations with your company (indistinctly, the "Company" or "Entity"). Therefore, your cooperation in this context is crucial. Please feel free to attach additional documents for any answers that require more space than is available in this questionnaire, as well as any supporting material.

Definitions

"Activity": Any acts, actions, undertakings, ventures, enterprises, projects, businesses, services, works or tasks related to projects in Venezuela, including, but not limited to, any activities or dealings with Venezuelan operations, suppliers, customers and agents, the export and import of goods or services to or from Venezuela, and any activities or dealings with the government of Venezuela, Petroleos de Venezuela, S.A., Petroregional del Lago, S.A., State legal entities or legal bodies, or state-controlled companies, and their respective subsidiaries, related parties, debts, equity or securities.

"Affiliate(s)": Any company that, at any time, the Company controls. In particular, (a) any company in which the Company controls, directly or indirectly, more than fifty percent (50%) of the capital stock or voting rights; (b) that such company controlled by the Company controls, in turn, directly or indirectly, more than fifty percent (50%) of the capital stock or voting rights of any other entity or any of its Affiliates; (c) the Company directly or through its Affiliates under (a) or (b) above, owns or controls less than fifty percent (50%) of the outstanding share capital, voting rights or the appointment of directors at a general meeting of such company (or any other entity), but in which such company or any of its Affiliates exercises supervision in the case of any other entity or any of its Affiliates.

"Company": The entity (e.g., corporation, partnership, limited liability company, joint venture) interested in being part of M&P's providers panel.

"Public Official": Should be understood in a broad sense and designates, but is not limited to, any elected or appointed official, employee or agent of any national, regional or local government, state or department, agency or subdivision of any government, state or corporation in which a government or state owns, directly or indirectly, a majority or controlling interest, an official representative of a political party, a candidate for public office and any officer, employee or agent of a public international organization.

"Close relative of a State Agent/Official": It shall be understood in a broad sense and designates, but is not limited to, a spouse or partner, children, brothers or sisters or parents, the spouse or partner of their children or of their brothers or sisters, or any member of the household.

"U.S. Person": U.S. citizens (including dual citizens); lawful permanent residents of the U.S. (e.g., U.S. green card holders), regardless of where they are located and regardless of whether they currently reside in the U.S.; and any person present in the U.S. (regardless of nationality and while in the U.S.) Entities are considered a U.S. Person if they are incorporated under the laws of the United States or operate in the United States.

ANTI-CORRUPTION QUESTIONNAIRE

I. YOUR COMPANY AND M&P

Information about the M&P's employee that led to your first contact with M&P

Full name	
Position	
E-mail address	
Phone	
Country	

Declaration of conflicts of interests

Does any member of your Company have any personal or family relationship with someone who is or has been a part of Maurel & Prom? If your answer is yes, please additionally answer: -Please provide the full name of the family member, acquaintance or friend and explain how they are related to your Company (provide details of the relationship) -What role or position did or do they have within Maurel & Prom? -Does the family member, acquaintance or friend have any direct or indirect interest (of any kind) in your Company becoming a supplier of Maurel & Prom? Please describe this interest, if any.	Yes / No
Does any member of your Company have any personal or family relationship with someone who is or has been a part of Petroregional del Lago, S.A.?	Yes / No

If your answer is yes, please additionally answer: -Please provide the full name of the family member, acquaintance or friend and explain how they are related to your Company (provide details of the relationship) -What role or position did or do they have within Petroregional del Lago, S.A.? -Does the family member, acquaintance or friend have any direct or indirect interest (of any kind) in your Company becoming a supplier of Petroregional del Lago, S.A.? Please describe this interest, if any.	
Is your family member, acquaintance, or friend aware of your Company's application to become a supplier?	Yes / No
Has any member of your Company had a previous employment relationship with Maurel & Prom and/or Petroregional del Lago, S.A.? If your answer is yes, please additionally specify: The positions held and the period during which these positions were held.	Yes / No
Does any member of your Company or any member of your family have an ownership interest in any company or joint venture with any employee of Maurel & Prom and/or Petroregional del Lago, S.A.? If your answer is yes, please additionally specify: The name of the company or joint venture, the date you became involved, and a description of the company's purpose.	Yes / No
Does your Company or any of its employees own any shares or titles in Maurel & Prom? If your answer is yes, please additionally specify: The percentage of ownership and when the shares were acquired.	Yes / No
Has any member of your Company received or expected to receive any type of economic benefit (bonuses, commissions, gifts, etc.) from Maurel & Prom and/or Petroregional del Lago, S.A. beyond payments for goods or services provided? If your answer is yes, please additionally specify:	Yes / No

Describe the benefit that could be received, from whom it was or will be received and, if benefits have already been received, what has been received.	
Do you have any relationship that creates or could create a conflict of interest that you should disclose?	Yes / No
If your answer is yes, please additionally specify: Describe that relationship or circumstance.	
Information about the contact person(s) in your Company	
Full name	
Nacionalities (Include all)	
Country of residence	
Green card holder	Yes / No
Position	
E-mail address	
Phone	
Information on expected or existing business relationship with M&P	
Expected or existing business (Brief description of the service intended to provide or the goods intended to sell. Indicate whether any of the goods to be sold or services to be rendered, in their entirety or any of their components, tangible or intangible, are of Iranian origin or have any connection with said territory)	
Country (Of origin of goods or place where the service will be provided from)	

II. YOUR COMPANY	
General information	
Company's name	
Address	
Company's purpose	
Phone/E-mail Address/Fax	
Webpage	
Incorporation information	
Incorporation details (Commercial registry office, number and book by which it was incorporated)	
Date and place of incorporation	
Type of legal entity (E.g.: LLC, INC, Corp, etc.)	
Legal representative information	
Full name	
Position (E.g.: President, General Director, etc.)	
Nationalities (Include all)	
Country of residence	

Green card holder	Yes / No
Date of birth	
Information about shareholders and beneficial owners	
Description of the shareholder structure of your Company. Follow this nomenclature: <u>Individuals:</u> Full name - Shareholding percentage <u>Legal entities:</u> Company name - Shareholding percentage If your Company's shares are listed on the stock exchange, please identify the individuals or legal entities that hold 5% or more of its capital stock. Please also provide a diagram of your Company's current shareholding structure.	
If there are legal entities as shareholders, please state the full name of the individuals who are beneficial owners of your Company and their percentage of participation. (if your Company's shares are listed on the stock exchange, please identify the individuals or legal entities that hold a stake equal to or greater than 5% of its share capital)	
For each shareholder (individual or legal entity) mentioned in the previous questions, please indicate the following in order: • Are they Venezuelan? • Are they U.S. American? • Do they hold more than one nationality? If yes, please <u>list all of them</u> • Do they possess a green card? • Country of residence <u>You must answer every one of these questions for each person.</u>	

Information about the board of directors	
Please provide the following information for all current board members and administrators: • Full Name • Position (e.g., Director, Administrator) • Are they Venezuelan? • Are they U.S. American? • Do they hold more than one nationality? If yes, please <u>list all of them</u> • Do they possess a green card? • Country of residence <u>You must answer every one of these questions for each person.</u>	
Information about your Company's activities	
Number of employees	
If your Company's shares are listed on a stock exchange, indicate the market(s) where they are listed. If not listed, please indicate	
Does your Company make public the list of its local or foreign subsidiaries, countries of establishment, as well as the significant figures of its activity country by country?	Yes / No If "No", please explain why
Names and addresses of the main companies for which your Company currently provides or has provided services, products, etc., during the last 5 years.	Provide a list
Names, addresses, and ultimate beneficial owners (to the extent known) of subcontractors that your Company may use under the contractual relationship with M&P and indicate whether they may have a business relationship with State Agents/Public Officials, directly or indirectly, in whole or in part, with State Agents/Public Officials or Close Relatives of a State Agent/Public Official, or with officers or directors who are State Agents/Public Officials or Close Relatives of a State Agent/Public Official.	Provide a list

III. RELATION TO STATE AGENTS OR PUBLIC OFFICIALS	
Do any of the following persons qualify as a State Agent/Public Official or a Relative of a State Agent/Public Official?	
Any director, officer, direct or indirect shareholder of your Company	Yes / No If "Yes" is selected, identify such persons, the position they hold, as well as the relevant government, agencies or bodies; if your Company's shares are listed on a stock exchange, identify the natural or legal persons who hold an interest equal to or greater than 5% of its capital stock.
An agent or consultant of your company	Yes / No If "Yes" is selected, identify such persons, the position they hold, and the relevant government, agencies or bodies.
Any close relative in the broadest sense of any director, officer or shareholder of your Company or any agent or consultant thereof	Yes / No If "Yes" is selected, identify such persons, the position they hold, and the relevant government, agencies or bodies.
Will the State Agent/Public Official or the Close Relative of a State Agent/Public Official receive or be likely to receive any pecuniary or other benefit in the event that M&P establishes a business relationship with your Company?	Yes / No If "Yes", please identify the State Agent/Public Official or the State Agent/Public Official's Close Relative and describe the benefit he/she could receive

IV. LEGAL AND COMPLIANCE PRECEDENTS	
Has your Company, its subsidiaries, affiliates, suppliers, subcontractors and other related third parties, or any of the officers, directors or shareholders of the latter, been subject to a criminal or civil investigation or proceeding or interrogation initiated by all competent authorities within the last 5 years for alleged corruption/corruption-like practices/insider trading offenses/terrorist financing/violation of financial sanctions/misleading accounting/financial control failures/non-implementation of procedures to prevent corruption or lack of effectiveness of such procedures?	Yes / No If "Yes", describe the alleged facts, the outcome of the criminal or civil investigation or proceeding or interrogation or, as applicable, the current status of the investigation or proceeding (attach any additional items if applicable).
Describe the policies, procedures and other actions your Company has adopted and implemented to support a formal commitment to zero tolerance of corruption and to prevent corruption in any form by your Company, its subsidiaries and all its business partners, in particular the payment of bribes to Public Officials and facilitation payments (e.g. risk mapping, code of conduct, anti-corruption policies, training programs). (e.g. risk mapping, code of conduct, anti-corruption policies, training programs)	Provide all existing support material
Do you perform prior due diligence (including, but not limited to, sanctions screening) on third parties (e.g. suppliers, subcontractors) that you would use in the framework of the business relationship with M&P?	Describe the due diligence process, including the use of any third-party vendors

QUESTIONNAIRE OF THE SANCTIONS REGIME

I. YOUR COMPANY AND THE SANCTIONS REGIME	
Is the Company a U.S. Person?	No, the Company is not a U.S. Person. Yes. Specify details:
Is the Company owned by U.S. Persons?	No, the Company is not owned by U.S. Persons Yes. Specify details:
Is the Company controlled (board members) by U.S. Persons?	No, the Company is not controlled (board members) by U.S. Persons. Yes. Specify details:
Has any member of the Board of Directors, shareholder or close relative of any of them, been or is currently designated or listed under the U.S. sanctions regime or any other local sanctions law?	No Yes. Specify details:
Does the Company participate or has the Company participated in any Activities involving individuals, entities or organizations that are currently targeted or designated or listed under the U.S. sanctions regime or any other sanctions law?	No Yes. Specify details:
Does the Company participate or has participated in any Activity with the Government of Venezuela or any entity 50% or more owned or controlled by the Government of Venezuela?	No Yes. Specify details:



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Does the Company have a compliance program with U.S. sanctions law or any other foreign sanctions regime?	No Yes. Specify details:
Describe the processes the Company implements to ensure that its Business is not subject to the sanctions regime of the U.S. or any other country	
Describe the processes the Company follows to monitor the introduction of new sanctions and changes to existing sanctions	
Does the entity engage in any Activities under general or specific licenses issued by OFAC or permits issued by other local sanctions regulators?	No Yes, specify the details of the license/permit and describe the processes/controls in place to ensure that the license/permit still applies and is in force
Does your Company have any relationship with Russia?	No Yes. Specify details:
Does your Company have any relationship with Iran?	No Yes. Specify details

II. YOUR EMPLOYEES AND THE SANCTIONS REGIME	
Does the Company have employee(s) who are U.S. citizens or have filed an application for U.S. citizenship?	No. Yes, can you please provide additional information (<i>i.e.</i> date of issue, date of application).
Does the Company have one or more employees who are U.S. permanent residents (<i>i.e.</i> , green card holders) or has the Company applied for a U.S. green card?	No Yes. Provide additional information (date of issue, date of application)
Are any of the Entity's employees visiting or residing (temporarily) in the United States?	No Yes. Specify details:
Do your employees have any relationship with Russia?	No Yes. Specify details:
Do your employees have any relationship with Iran?	No Yes. Specify details:



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III. PROJECTS IN VENEZUELA	
For any U.S. Person identified in the above questions, please confirm whether such persons will perform any services for M&P (including overseeing, managing, or assisting individuals providing services to M&P).	No Yes. Specify details:
Confirm whether any of the services to be provided or any of the goods to be sold by the Company to M&P as Contractor will be performed in or from the USA.	No services or goods shall be rendered or sold in or from the USA. Services or goods shall be rendered or sold in or from the USA. Specify details:
Confirm whether any of the services to be provided or any of the goods to be sold by the Company to M&P as Contractor will, or could, pass through the U.S. during their transfer or transit to Venezuela.	No services or goods will, or could, pass through the U.S. during their transfer or transit to Venezuela. The services or goods to be provided or sold will or could, pass through the U.S. during their transfer or transit to Venezuela. Specify details:
Does the Company conduct any U.S. dollar transactions in general or related to the projects identified in the first part of this section?	No Yes. Specify details:

Affidavit on the following page



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Affidavit

By completing and signing this questionnaire, the undersigned declares that he/she has the necessary capacity and the right to disclose the information contained in this questionnaire and declares that he/she is duly authorized to represent the Company.

Accordingly, the Company, represented by the undersigned:

- understands and agrees that M&P and its partners, as well as its Affiliates, will rely on the answers provided in this questionnaire and thus share such information among themselves in order to (i) identify any possible risk of exposure under applicable anti-corruption laws and legislation, (ii) decide whether to enter into a business relationship, or continue an existing one, and consents to such sharing of information (as well as with designated anti-corruption consultants or experts);
- consents to the processing of such information for the purpose described herein;
- acknowledges that the processing of such information may be carried out by a third party on behalf of M&P or may be carried out in a country other than the country in which it was disclosed;
- declares that the information provided herein is accurate, authentic, true and complete as of the date of disclosure;
- represents that any change in circumstances affecting the answers to the above questions will be promptly notified to M&P for the duration of the business relationship by transmitting an updated version of this questionnaire;
- represents and undertakes that neither the Company nor its personnel will engage in corrupt, private or public, or other similar practices as part of any activity covered by the business relationship existing or to be established between the Company and M&P; and
- acknowledges that the Company and its concerned personnel have been made aware of the M&P Ethics Charter (Attachment 1) and the M&P Policy on Gifts, Entertainment and Business Luncheons (Attachment 2), and agree to comply with the commitments contained therein.

Failure to provide complete and correct answers to the questions posed in this questionnaire will prevent the establishment of a business relationship between your Company and M&P or the continuation of an existing one. Therefore, M&P reserves the right to terminate the business relationship in the event that the information provided in this questionnaire is incorrect, misleading or not up to date.

M&P, which receives and processes such information, is expected to do so for the purposes described above and to protect such data in accordance with applicable laws and regulations. In return, any person covered by such data has the right to access or rectify the information concerning him/her, provided that he/she sends a written request to M&P.

Full name:

Position:

Signature and ink stamp:

Date:

