

Ethics & Integrity Policy

Contents

| | |
|--|---|
| 1. Introduction | 3 |
| 2. Content of Regulation | 4 |
| 2.1. What does integrity mean to us?..... | 4 |
| 2.1.1. We act correctly | 4 |
| 2.1.2. We act with honesty | 4 |
| 2.1.3. We act with respect..... | 4 |
| 2.1.4. We act with fairness..... | 5 |
| 2.1.5. We protect our company | 5 |
| 2.2. Responsibility..... | 5 |
| 2.2.1. Managers..... | 5 |
| 2.2.2. Employees | 6 |
| 2.3. Accountability..... | 6 |
| 2.4. Speak up..... | 6 |
| 2.5. Confidentiality | 7 |
| 2.6. Suppliers' integrity..... | 7 |
| 2.7. Ethics & Integrity Committee..... | 8 |
| 2.8. Our Ethics & Integrity Principles at a glance | 8 |

1. Introduction

To emphasize our commitment to ethics and integrity we are introducing this Ethics & Integrity Policy which reflects the standards and principles we expect from ourselves.

This Ethics & Integrity Policy shall make clear to our employees and external stakeholders that OMV not only follows the law but also strives to operate at the highest level of ethics. Acting ethically and with integrity is the only way we want to operate at OMV¹.

OMV recognizes that its reputation is not only determined by the products and services it offers but also by its employees and the way they act. These actions shape how customers regard our products and services and how shareholders regard their investment in OMV.

To maintain the trust in and the good reputation of OMV, it depends on each one of us to take decisions based on what is right and ethical. This Ethics & Integrity Policy sets forth the standards and principles that employees and managers are asked to follow in order to uphold our commitment to ethics and integrity. They apply without exemption to all employees of OMV and its subsidiaries worldwide.

We do not only expect our employees to act ethically and with integrity but also our business partners. OMV is a signatory to the UN Global Compact (UNGC). UNGC principles are enshrined in OMV's Code of Conduct. We expect employees who deal with third parties to require them to comply with all relevant aspects of OMV's Code of Conduct..

¹ With regard to this Group Directive, "OMV" shall mean all OMV Group companies excluding Borealis Group.

2. Content of Regulation

2.1. What does integrity mean to us?

OMV cares how results are obtained, not just that they are obtained. Integrity is the principle that shall provide direction in how to conduct ourselves when making decisions.

For OMV, acting ethically and with integrity means the following:

- (1) We act correctly.
- (2) 2. We act with honesty.
- (3) 3. We act with respect.
- (4) 4. We act with fairness.
- (5) 5. We protect our company.

It is these principles that form the foundation of how we want to run our business ("Ethics & Integrity Principles").

2.1.1. We act correctly

We expect you to comply with the statutes and governmental regulations of the countries in which OMV operates and to adhere with OMV's internal regulations, processes and controls that outline the correct and safe way of working.

It is essential that you familiarize yourself with the laws that apply in the country in which you perform your work. Compliance with applicable laws and internal regulations ensures not only that you protect yourself but also others as well as OMV against any serious harm.

2.1.2. We act with honesty

Honesty is the basis for any trustful relation. Honesty means to speak the truth, to avoid giving a false impression, and to clarify misunderstandings.

We expect our employees to be open and candid in dealings both internally and externally. Honesty towards all stakeholders ensures that OMV is perceived as a trustworthy partner.

2.1.3. We act with respect

We expect all employees to treat each other with respect by enhancing inclusion and diversity as well as by observing privacy and personal dignity.

Respect is about valuing individual contributions of each person and about being sensitive in your communication and behavior. We will achieve the best outputs when we work together collaboratively and respectfully.

The principle of respect shall be applied not only to your colleagues but also to third parties, such as customers or business partners.

2.1.4. We act with fairness

We expect you to demonstrate fairness by being objective, considering all of the circumstances, and to base decisions on merit. Fairness means also treating everyone equally. All employees shall be given an opportunity to be heard whether it is allowing them to share ideas or to voice grievances.

2.1.5. We protect our company

We expect you to protect OMV's reputation and values. This includes that you are encouraged to speak-up if you see any illegal or inappropriate conduct in order to avoid that harm is caused to others or OMV. Protecting OMV means also to treat OMV internal information with due care and to ensure it is not disclosed to unauthorized persons or third parties.

In this way, we create the trust towards our customers, business partners and investors.

2.2. Responsibility

We expect managers and employees to take ownership and foster an organizational culture that supports doing the right thing. Each of us should make a personal commitment to follow this Ethics & Integrity Policy, both in letter and spirit.

2.2.1. Managers

Managers have extended responsibilities. We expect that managers² make a significant contribution to upholding and promoting our Ethics & Integrity Principles by acting as a role model and living the best example.

The importance of doing the right thing must be emphasized and conveyed to your team members. Make it a topic of discussion in your jour fixes and other departmental meetings. Clearly communicate ethical expectations and make room for discussions with your team on lessons learned and how to improve. Pay attention to your team members' behavior and offer suggestions for how to do things more ethically.

Open your door to hear your team members' ethical concerns and take the time to listen what they are saying. Tell your team that if they raise an ethical issue, you will support them.

Include adherence to this Ethics & Integrity Policy and living up to the Ethics & Integrity Principles also to your feedback talk and annual performance review of your team members.

Communicate the Ethics & Integrity Policy to your team and make it a requirement that necessary trainings required for job performance are completed to ensure that all legal requirements and internal standards are followed.

² Managers includes SVPs, VPs, Head of Departments and Department Managers.

2.2.2. Employees

It is essential that you know the rules that apply to you when performing your daily tasks and business operations. You have to familiarize yourself with all relevant laws as well as internal standards and processes.

In case of doubt about applicable laws in the country you perform your work or the relevant internal standards and processes, you should ask your line management, Legal or contact Compliance.

Always scrutinize how you are doing business and in particular whether you do the right thing in line with OMV's Ethics & Integrity Principles.

How you act makes a difference. Do the right thing and set an example for others.

2.3. Accountability

We do not tolerate achievement of results at the expense of violating the law, internal standards or our values. Everyone is required to behave and act in line with the Ethics & Integrity Principles.

We expect you to read all of the Ethics & Integrity Policy, to learn about our Ethics & Integrity Principles and to follow them at all times. The Ethics & Integrity Policy applies to all employees, everywhere in the world, at all levels of OMV, without exception.

So, whenever you are faced with a decision, ask yourself the following questions:

- (1) Is my behavior in line with the law and internal regulations?
- (2) Is it in line with the principle of acting with honesty, respect and fairness?
- (3) How would my actions affect our stakeholders and could I justify my decision?
- (4) Would I be comfortable if my decision was made public internally or externally?

If the answer to one of these questions is "no" or if you have any doubts, you are expected to consult with your line management, People & Culture, Legal or Compliance and discuss the matter openly before acting.

Any misconduct is consistently addressed and investigated. We have zero tolerance for violations.

2.4. Speak up

We encourage a culture of openness and fairness where employees can voice their concerns. Managers should pay attention that employees conduct business with integrity and offer suggestions for how to do things more ethically. Conversely, all employees are encouraged to express their views and speak openly and freely about ethics and integrity at the workplace and any other issue of concern.

The route for raising concerns if business is not conducted in the most ethical way is through your line management. Managers are expected to create an open-door work environment and listen to ethics and integrity issues. They are responsible for ensuring

the integrity required in this Ethics & Integrity Policy in business dealings of their teams.

However, if you feel you cannot speak with your line management, or you have already reported a concern that you feel is not being addressed properly, you may directly contact People & Culture, Legal or address your concern with Compliance. If you desire, you may also report your concern confidentially and anonymously via the secure web-based whistleblowing system “Integrity Platform”.

Any employee raising concerns in good faith will be protected against retaliation and will not have to fear any disadvantage, even if it turns out to be mistaken at a later point in time (please refer to the Group Whistleblowing Directive). Every concern is taken seriously and investigated with utmost diligence and care.

We cannot solve problems we do not know about, so we rely on each of you to contribute. So, if you see something, we encourage you to say something!

2.5. Confidentiality

Information is valuable. The unauthorized disclosure of OMV internal information can lead to a loss in value, violate applicable laws and internal regulations and may be detrimental to OMV’s reputation.

We also have an obligation towards our business partners and customers to always handle business information confidentially. This is the only way we can ensure to be a trustworthy partner.

We expect that you will always treat OMV internal information confidential and not share it with unauthorized persons or third parties. The principle of confidentiality means also to take all reasonable steps to preserve confidentiality, e.g., by limiting disclosure on a “need to know” basis, following a “clean desk” policy, saving files in a secure way, changing passwords regularly, and exercising caution when using your phone or laptop in the public area.

If you have any doubts about the confidential nature of the information, ask your line management before sharing the information with others.

2.6. Suppliers' integrity

We hold our suppliers to the same standards of integrity to which we hold ourselves. Therefore, all suppliers must comply with the OMV Code of Conduct as a condition of doing business with us. Our suppliers include, inter alia, any third-party vendor, consultant, contractor, service provider, or supplier of materials.

All employees are expected to report any deviations by suppliers from relevant aspects of OMV’s Code of Conduct to their line management, Procurement, Legal or Compliance.

2.7. Ethics & Integrity Committee

OMV has established an Ethics & Integrity Committee with the purpose of enhancing the implementation of the Ethics & Integrity Policy and promoting the Ethics & Integrity Principles within OMV's organization. The Ethics & Integrity Committee shall consist of corporate and business functions from all board divisions³. The members of the Ethics & Integrity Committee shall be appointed by the Executive Board upon the recommendation of the SVP Internal Audit & Compliance and shall meet periodically each year.

The main task of the Ethics & Integrity Committee is to enhance awareness among OMV's staff about the Ethics & Integrity Principles. The Ethics & Integrity Committee members shall be the focal point on integrity and ethics matters within their respective board divisions.

Furthermore, the Ethics & Integrity Committee shall provide a forum to discuss ethics and integrity matters.

2.8. Our Ethics & Integrity Principles at a glance

We are committed to a culture of ethics and integrity in which we act not only in line with legal requirements but also strive to operate at the highest level of ethics.

We do what is right, protect our company and act with honesty, respect and fairness.

We comply with the applicable laws of the countries in which we operate and ensure adherence to all company guidelines, processes, and controls.

We are open and honest. We avoid giving a wrong impression and help clarify potential misunderstandings.

We treat each other with respect. We value other individual's contribution and are sensitive in your communication and behavior to others.

We are objective and consider all circumstances and base decisions on merit. We give everyone an opportunity to be heard whether it is allowing them to share ideas or to voice grievances.

We protect confidential information and do not share it unauthorized.

We encourage a culture of openness and fairness in which employees can raise their concerns unconditionally.

We encourage employees to speak up and raise their concerns on misconduct.

³ OMV Petrom will establish a separate Ethics & Integrity Committee based on the same principles, e.g. the members of the Ethics & Integrity Committee shall be appointed by OMV Petrom Executive Board upon the recommendation of the OMV Petrom HoD Compliance.