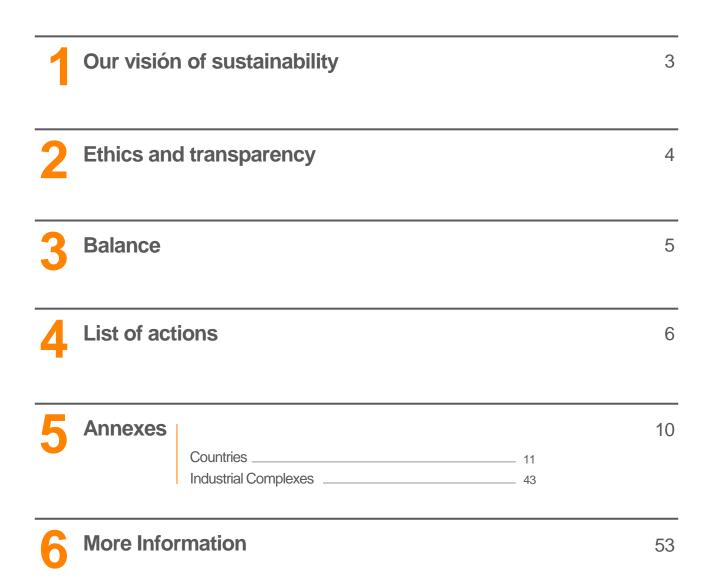


ETHICS & TRANSPARENCY

2021 Sustainability Plans



Contents



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This document includes a set of actions which, in whole or in part, go beyond what is required by law and are aimed to contribute to sustainable development. Participating companies of Repsol Group have the firm intention to undertake and fulfill them. However, they reserve the right to modify, postpone or cancel their implementation without incurring liability, but undertake to publicly justify these possible cases.

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1 Our visión of sustainability

At Repsol, we contribute to sustainable development by seeking to satisfy the growing demand for energy, which is essential for the fulfillment of people's fundamental rights, and by creating value in both the short and long term.

We maximize our positive impact and minimize our negative impact on society and the environment throughout our value chain by acting ethically and transparently. In doing so, we seek to comply not only with the regulations in force but also with the main international standards.

Under these premises, our sustainability model incorporates ethical, environmental, and social considerations into our decision-making process, based on dialogue with stakeholders. We do this every year, creating initiatives that address the concerns of these stakeholders. This is how the **Sustainability Plans** — action plans that are available to the public and created on an annual basis — are born. The **Global Sustainability Plan** is the roadmap forming the basis for deployment of **Local Plans**. The plans also contain commitments in relation to the local context.

The **Sustainability Plans** are put together on the basis of the **six axes** of Repsol's Sustainability Model.



2 Ethics & Transparency

AT REPSOL, WE CONTRIBUTE TO SUSTAINABLE DEVELOPMENT

We act with integrity in all countries in which we are present. Our ethical conduct involves strict compliance with both the letter and the spirit of the law.

On this axis, we establish the set of actions that ensure the company promotes and encourages a culture of integrity and responsibility for all Repsol employees, as well as our suppliers, contractors, and business partners.

We also define **transparency and accountability** as differential elements in the Repsol sustainability model. To be credible, it must be consistently transparent. We want to be publicly recognized as an honest and transparent company in tax-related matters. Thus, **we are engaged in EITI** (Extractive Industries Transparency Initiative) with the aim of strength our cooperative relationships with the administrations.

In the different Sustainability Plans, we have committed to actions that will help the company overcome the challenges we have set for ourselves in this area, while responding to the main expectations of our stakeholders

Below, we list the actions that show our commitment to Ethics & transparency.

The actions that make up in Ethics and transparency issues in the Sustainability **Plans** help support the United Nations' **2030 Agenda** by addressing the following Sustainable Development Goals (SDG):









At the end of the year, it is time to review each of the **Ethics & transparency initiatives of the sustainability Plans**. The degree to which the objectives have been fulfilled is as follows:



Further down, we provide the actions from the Ethics & transparency axis.

Number of actions in Ethics and transparency



COUNTRY

ACTION

Algeria	Improve our social performance.
Bolivia	 Communicate actions of the United Nations 2030 Agenda and the Global Compact, carried out by the UNBO (Bolivia Business Unit) to the State and partners in the Caipipendi bloc. Communicate to internal stakeholders about tax policies and practices and our tax contribution in Bolivia, as a good transparency practice.
Brazil	 Increasing the fiscal transparency of our upstream operations in Brazil. Ensure the insertion of compliance clauses in new contracts.
Canada	 Promote and encourage a culture of integrity and responsibility for all employees, operating in strict accordance with our Code of Ethics. Promote cooperative relationships with local tax authorities.
Colombia	 Simplify Repsol's corporate structure in Colombia, in order to align it with the business and adapt it to legal requirements and corporate standards. Develop cooperative relations with the National Tax and Customs Directorate (DIAN). Publish information on tax policies and practices, as well as our tax contribution in Colombia, as a good transparency practice. Support the development of an effective tax system by participating in international initiatives on responsible taxation and tax governance. Strengthen the culture of compliance and improve the identification, monitoring and support in the management of corruption risks in Repsol Colombia.



COUNTRY	ACTION
Ecuador	 Monitor compliance with legal, tax and labor obligations of contractors for complementary services. Manage procurement and contracting of the Ecuador Business Unit for suppliers, local and/or domiciled contractors. Execute the sustainability plan for the Ecuador Business Unit. Participate in the preparation of the report that includes the fiscal contribution in Ecuador, as a good transparency practice.
Indonesia	 Continue to promote ethics and transparency through good governance practices in the form of annual refresher training for Expense Report and Advances. Train and certificate our Tender Committee in the Indonesian regulation for supply chain management. Promote ethics and transparency relating to anticorruption and compliance in the form of annual compliance training.
Malaysia	 Increase knowledge of personal data protection within the employees of Malaysia Business Unit.
Mexico	 Reinforce the communication plan with new initiatives that contribute to consolidating the monitoring of ethics and conduct standards at Repsol. Publicly communicate our compliance, ethics and conduct manuals.
Norway	 Share knowledge and best practices on technology and tools outside our company.
Peru	 Promote transparent and trustworthy relationships with the Tax Administration (TA) based on active collaboration. Disseminate sustainability programs throughout the year through our digital assets. Roll out a communication and training campaign to strengthen knowledge on compliance, ethics and anti-corruption.

COUNTRY

ACTION

United Kingdom	 Manage tax matters by applying good tax practice.
United States	 Promote cooperative relationships with tax authorities.
Venezuela	 Train the main suppliers of the Venezuela Business Unit in the correct use of the SAP Ariba Network platform. Open information cycles on the Supplier Code of Ethics and Conduct with the main suppliers in our value chain, aimed at reciprocal benefit that establishes the minimum requirements according to which Repsol expects its suppliers to act. Train our employees on conflict of interest issues.

	ACTION
A Coruña	 Draw up a communication plan on the development of the Project to transfer crude oil traffic to the Punta Langosteira Outer Harbour. Promote the economic development of the Complex's environment, ensuring fair competition and good practice in procurement and
	 To have a 24-hour communication channel for citizens.
Cartagena	Ensure transparency in Safety and Environment.
Petronor	 Implement "TiketBai" billing to avoid tax avoidance.
Puertollano	 Promote active communication and transparency with the society of Puertollano: media, Public Advisory Panel and entities of various kinds. Promote the economic development of the surroundings of the Industrial Complex, taking advantage of the potential of the business fabric of the area.
Sines	 Inform the Authorities and other stakeholders of situations that may affect the community in matters related to health, safety and the environment.
Tarragona	 Identify and respond to the information demands and concerns of society in relation to our activity to improve communication.

5 Annexes



Below, we detail the actions carried out in the axis of Ethics and transparency in all Local Sustainability Plans. The information referring to the countries and the reference to the industrial complexes are published in English.

Countries



Algeria



Action

Improve our social performance.

Description

We will organize a workshop with the collaboration of our department of community relations to update the Algeria's social impact matrix, as part of the company's social process.

Indicator

Update the social impacts matrix of the business unit.

What we've achieved



In October 2021, a workshop was held to update the social risk matrix of the Algerian Business Unit. It was facilitated by the Repsol Community Relations Department following the company's standards. The workshop focused on the identification and evaluation of the current social risks and the analysis of mitigation actions. These actions are mainly related to the community engagement, social training and the improvement of the social baseline in the area.



Bolivia

Action

Communicate actions of the United Nations 2030 Agenda and the Global Compact, carried out by the UNBO (Bolivia Business Unit) to the State and partners in the Caipipendi bloc.

Description

We will hold two meetings with State Organizations and Caipipendi block partners to communicate the contributions to the 2030 agenda and the Bolivia Business Unit Sustainability Plan.

Indicator

Hold two briefings.

What we've achieved



We have informed our partners and the State of our contribution to the United Nations Global Compact and the 2030 Agenda, by sending progress information and the annual report of the Bolivia Business Unit. Similarly, in the meetings we hold we have disseminated the contributions made, which are within the budgets approved by partners and the State.





Bolivia

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Action

Communicate to internal stakeholders about tax policies and practices and our tax contribution in Bolivia, as a good transparency practice.

Description

We will communicate to our internal stakeholders, fiscal information related to tax payments in Bolivia, as well as relevant information on fiscal issues, in accordance with the required criteria, taking the EITI criteria as a reference.

Indicator

Prepare an annual communication on relevant information on tax issues.

What we've achieved



We have prepared the material with relevant information for the corresponding dissemination and to achieve a better understanding of tax matters, framed within the principles of fiscal transparency of the EITI. The dissemination will be developed during the 2022 management.



Brazil



Action

Increasing the fiscal transparency of our upstream operations in Brazil.

Description

We will increase the tax transparency of related party transactions by simplifying the corporate structure and respecting international regulatory compliance practices. Following the publication of the new REPETRO (Law 13. 586/2017), the need for operating companies in the Netherlands will be reduced, resulting in the transfer of assets and contracts for Brazil.

Indicator

Completion of the activities of the three Dutch companies (Agri BV, Lapa BV and Guara BV) until December 2021.

What we've achieved



With the publication of the new REPETRO, the need for operating companies in the Netherlands was reduced. With the completion of the transfer of assets and contracts to Brazil, it was possible to begin the necessary steps to terminate the activities of the companies. As "non-operators", we work together with the "operators" to complete each of the steps. Thus, we have received confirmation that Guara BV will be the first among the other companies to be closed in the Netherlands.



Brazil



Action

Ensure the insertion of compliance clauses in new contracts.

Description

We will verify the inclusion of compliance clauses in the contracts signed by Repsol Sinopec to consolidate the culture of compliance and zero corruption in the activities developed in Brazil.

Indicator

Inclusion of compliance clauses in 95% of contracts signed by 2021.

What we've achieved



We have included the compliance clause in 100% of the new contracts signed by Repsol Sinopec Brasil (RSB) in 2021. The compliance clause included in the contracts, in addition to complying with current regulations and demonstrating RSB's concern with ethics business, allows avoiding or mitigating the risks of possible violations of regulations by our contractors and other stakeholders, thus avoiding financial and image damage to RSB.



Canada



Action

Promote and encourage a culture of integrity and responsibility for all employees, operating in strict accordance with our Code of Ethics.

Description

We will demonstrate our commitment to compliance by ensuring staff in Canada complete the Code of Ethics corporate training.

Indicator

Achieve a 90 percent response rate with a minimum of 80% percent.

What we've achieved



In 2021, we have achieved a 96.5% completion rate of the Code of Ethics corporate training for employees in Canada. This was accomplished through ongoing dialogue between leadership and employees with a high emphasis placed on the importance of this training.



Canada



Action

Promote cooperative relationships with local tax authorities.

Description

Repsol will engage with Canadian Revenue Agency and Internal Revenue Service by initiating a Mutual Agreement Procedure in order to eliminate the imposition of double tax that arose on the marketing fee between Repsol Energy Canada and Repsol Energy North America after Canadian Revenue Agency inspection of Repsol Energy Canada.

Indicator

Obtain relief from double tax to be completed by December 31, 2021.

What we've achieved



Through our constant commitment to promote cooperative relationships with local tax authorities, in 2021 we were successful in obtaining relief from double tax. This was achieved by conducting respectful, proactive, and ongoing engagement with the local tax authorities.



Colombia



Action

Simplify Repsol's corporate structure in Colombia, in order to align it with the business and adapt it to legal requirements and corporate standards.

Description

We will identify the necessary actions in order to achieve the simplification of the corporate structure in Colombia, aligned with the transparency criteria committed by Repsol.

Indicator

Develop and complete the action plan in accordance with the established milestones.

What we've achieved



We have simplified Repsol's corporate structure in Colombia by liquidating Repsol Servicios Colombia S.A. (RSC), according to the defined action plan. The Executive Committee approved the liquidation, we carried out the transfer of the Catleya contract and the sale of the remaining fixed assets of RSC to Repsol Colombia Oil&Gas Ltd. (RCOG) and we received the return of the 2020 rental balance in favor of RSC.



Colombia



Action

Develop cooperative relations with the National Tax and Customs Directorate (DIAN).

Description

We will maintain our active participation in the Tax Committee of the Colombian Petroleum Association (ACP) as the vehicle for channeling concerns about regulatory developments, thus avoiding or mitigating possible future controversies in the application of tax legislation.

Indicator

Receive the official response from the control bodies.

What we've achieved



We have participated in the different committees of the ACP (Colombian Petroleum Association), which has allowed us to transmit to the control organisms the concerns of the Oil & Gas industries.



Colombia



Action

Publish information on tax policies and practices, as well as our tax contribution in Colombia, as a good transparency practice.

Description

We will communicate to our employees information regarding tax payments in Colombia, as well as relevant information on tax matters.

Indicator

Communicate relevant information on tax matters.

What we've achieved



We have reported the payments to the government made up to the month of September 2021 and the information required by the EITI (Extractive Industries Transparency Initiative), pending the issuance of the final report for the year 2021.



Colombia



Action

Support the development of an effective tax system by participating in international initiatives on responsible taxation and tax governance.

Description

We will join the EITI (Extractive Industries Transparency Initiative) in order to strengthen our cooperative relations with the tax authorities and other supervisory bodies.

Indicator

Achieve accession in 2021 to the EITI (Extractive Industries Transparency Initiative).

What we've achieved



We have achieved adherence to the EITI (Extractive Industries Transparency Initiative), according to our intention.

In this way, we strengthen our cooperative relations with the Tax Administration and other control bodies.



Colombia



Action

Strengthen the culture of compliance and improve the identification, monitoring and support in the management of corruption risks in Repsol Colombia.

Description

We will update and inform about the processes in relation to the changes in Repsol's rules regarding compliance in the area of money laundering and transnational corruption.

Indicator

Communicate to employees and contractors the changes in compliance regulations, including those related to money laundering and transnational corruption.

What we've achieved



We have communicated to employees and contractors the changes in the standards of Gift Management, Due Diligence with third parties, Conflict of Interest Management and Repsol's Comprehensive Compliance Model through different information capsules.

We have sent suppliers and customers information on Repsol's most representative compliance standards, such as the Code of Ethics and Conduct, contributing to strengthening the culture of compliance.



Ecuador



Action

Monitor compliance with legal, tax and labor obligations of contractors for complementary services.

Description

We will perform monthly monitoring of compliance with employer obligations of complementary services companies before the Ecuadorian Institute of Social Security.

We will carry out the monthly monitoring of complementary companies' obligations before the Internal Revenue Service and the Superintendence of Companies.

Indicator

Comply with the monthly review of the 4 complementary service companies prior to the payment of invoices.

What we've achieved



On a monthly basis, we have reviewed with the Ecuadorian Social Security Institute, the Internal Revenue Service and the Superintendency of Companies the compliance with legal, tax and labor obligations of the contractors of complementary services.



Ecuador



Action

Manage procurement and contracting of the Ecuador Business Unit for suppliers, local and/or domiciled contractors.

Description

We will manage purchases and contracting, giving preference to national suppliers in order to stimulate the local economy.

Indicator

To ensure that at least 80% of purchases and contracts are made by local companies or companies domiciled in Ecuador.

What we've achieved



Ninety-seven percent of purchases and contracts were made through local suppliers or suppliers domiciled in Ecuador, thus promoting local economic development.



Ecuador



Action

Execute the sustainability plan for the Ecuador Business Unit.

Description

We will prepare the local sustainability report using the Global Reporting Initiative methodology, being accountable to Ecuadorian society.

Indicator

Publish sustainability report in June 2021 and report event in August 2021.

What we've achieved



We have complied in time and form with the publication of the Sustainability Report to stakeholders in June 2021, as well as with the launch of the multimedia package in August 2021.



Ecuador



Action

Participate in the preparation of the report that includes the fiscal contribution in Ecuador, as a good transparency practice.

Description

We will share relevant information on tax matters, in accordance with the criteria required as part of the EITI.

Indicator

Prepare, together with the EITI Ecuador Multi-stakeholder Group, the matrix at the hydrocarbon industry level on tax revenues generated by the activities.

What we've achieved



We have worked together with the government in the creation of the matrix on transparency issues in the extractive industry. We also launched the official website of the EITI (Extractive Industry Transparency Initiative).



Indonesia



Action

Continue to promote ethics and transparency through good governance practices in the form of annual refresher training for Expense Report and Advances.

Description

We will roll out Repsol's Expense Claim and Advance norms to all employees to give common understanding. We will include real life examples for discussion points and we will focus on government officials interactions, including specifics when dealing with them for entertainment, perdiem, etc.

Indicator

Achieve 100% participation of Jakarta office employees.

What we've achieved



We have rolled out a refreshment session of employee's expenses guideline, reaching our 83 employees in Jakarta (100% participation).

The session used real life examples for discussion points as government officials' interactions, including specifics when dealing with them for entertainment and perdiem. It also socialized related global norms, the Administration Form Expense Report, advance funding related to travel request and fixed fund (petty cash).



Indonesia



Action

Train and certificate our Tender Committee in the Indonesian regulation for supply chain management.

Description

We will establish a Tender Committee structure to comply with local Indonesia government regulation for supply chain. All appointed personnel to be Tender Committee shall have valid certificate based on the said regulation.

Indicator

Ensure all personnel appointed as Tender Committee has passed and has been certified.

What we've achieved

We have established a Tender Committee structure with 25 people as members. Six of the members have been certified and the rest of them are planned to be certified in 2022.



Indonesia



Action

Promote ethics and transparency relating to anticorruption and compliance in the form of annual compliance training.

Description

We will conduct our annual compliance program to refresh for all employees the compliance norms (Anticorruption, Gift and hospitality, Third party due dilligence and Conflict of interest), as well as introduce the new norm on Key factor in managing relationship with government official. The training is also a media to share real situation on site which employees are coping, and to seek mitigation and solution for such real issues.

Indicator

Perform annual training for compliance for all employees (minimum 80% of participation).

Introduce new norm of Key factors in managing relationship with government.

Socialize Repsol's compliance norms with the operator of the asset (for the asset in which we are non-operator).

What we've achieved



We have conducted the Repsol compliance policies and procedures training. It consists of key factors in managing relations with public officials, due diligence of third parties, conflicts of interest management, anti-bribery and corruption, Code of Ethics and Business Conduct and gifts and entertainment management.

In the training has participated 92% of the total employees.

Socialization of Repsol Compliance Norm to the operator has been performed thru official letter from Repsol management and email.



Malaysia



Action

Increase knowledge of personal data protection within the employees of Malaysia Business Unit.

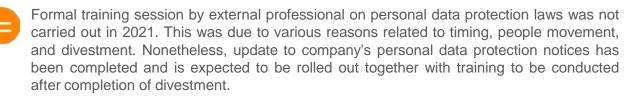
Description

We will provide or procure training to employees on personal data protection, and we will review and update Repsol's data protection notices if needed.

Indicator

Train 10% of employees, particularly the functions that handle personal data of others in carrying their job.

What we've achieved





Mexico

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Action

Reinforce the communication plan with new initiatives that contribute to consolidating the monitoring of ethics and conduct standards at Repsol.

Description

We will work with all people working at Repsol in Mexico to ensure that they carry out their activities in accordance with the strict rules of ethics and conduct that govern any activity in the company. We will make digital compliance training pills available to all Repsol Mexico employees. We will promote the use of the Repsol intranet to consult compliance issues and that all Repsol people in Mexico have access to the different internal rules in this regard.

Indicator

Send 4 communications to all employees with information on the subject.

Carry out at least one compliance training session for 85% of Repsol Mexico employees.

What we've achieved



We have sent 14 communications to our colleagues about the tools that Repsol makes available to apply the Standards of Ethics and Conduct that govern the company, such as policies to consult and video guides. In addition, we have conducted 3 online trainings and 2 courses through webinars. 80% of Repsol employees have taken these courses/webinars.



Mexico



Action

Publicly communicate our compliance, ethics and conduct manuals.

Description

We will include information on the Repsol Mexico website about our internal control systems for our management, ethics and conduct and compliance, with the aim of making our self-demand in these areas transparent.

Indicator

Incorporate information on ethics and transparency on the Repsol website.

What we've achieved



We have incorporated into our website the code of ethics and conduct that should mark all our activity. We have trained all of Repsol Mexico's employees and we have added to our code of conduct with various messages that require compliance with this decalogue of good practices.



Norway



Action

Share knowledge and best practices on technology and tools outside our company.

Description

We will share and promote the Repsol READs tool (environmental impact profile) and the Zero Emissions Coaches initiative with other partners in our industry.

Indicator

Inform about the READs tool with partners in our industry through our networks in the Norwegian Oil & Gas Association.

Share experience and process related to our Zero Emission Coaches initiative through our network in the Norwegian Oil & Gas Association.

What we've achieved



We have performed three presentations of the READS tool through the Norwegian Oil & Gas Association. The presentations have been held for the BAT (Best Available Techniques) guidance working group , the Forum for Climate & Environment and for the Collaboration Forum.

We have shared our experience related to our Zero Emission Coaches initiative through our climate & environmental network in the Norwegian Oil & Gas Association.



Peru



Action

Promote transparent and trustworthy relationships with the Tax Administration (TA) based on active collaboration.

Description

We will collaboratively manage the procedures with the TA, placing emphasis on maintaining the certification of La Pampilla Refinery as an Authorized Economic Operator (OEA) for the year 2021. Likewise, we will make available a training plan on issues related to the hydrocarbon sector in coordination with the National Mining, Petroleum and Energy Society (SNMPE) for TA officials.

Indicator

Manage the renewal of the certification of La Pampilla Refinery as Authorized Economic Operator for the year 2021.

Make available, in coordination with the SNMPE, a specialized training plan on hydrocarbon issues and the impact of COVID-19 for the AT.

What we've achieved



We have managed to maintain the AEO certification for 2021 through collaborative relationships with SUNAT (National Customs Superintendency), accrediting compliance with legal requirements.



Peru



Action

Disseminate sustainability programs throughout the year through our digital assets.

Description

We will publish our sustainability programs as well as the country's annual report and sustainability plan on our social media accounts.

Indicator

Carry out five publications on sustainability issues on the Repsol Peru accounts on Facebook and Instagram.

What we've achieved



We far exceeded the estimated goal, we made 10 publications during the year. We have communicated different content on sustainability through Repsol Peru's social networks, for example the management of the sustainability plan in its six axes as well as what was reported in the previous year's report, recognitions, responsible management of resources and the preservation of The Biodiversity.



Peru



Action

Roll out a communication and training campaign to strengthen knowledge on compliance, ethics and anti-corruption.

Description

We will carry out a campaign to encourage a culture of compliance, by disseminating the tools that Repsol has so that all collaborators act responsibly and with integrity. The campaign will consist of six deliverables and will include the most relevant topics.

We will disseminate the Repsol Group's guidelines on anti-corruption, ethics and conduct by promoting different training activities.

Indicator

Carry out the awareness campaign consisting of six deliverables over the course of the year.

Carry out five training activities on compliance, anti-corruption and ethics during the current year.

What we've achieved



Between the months of June and October 2021, we carried out the awareness and training campaign "We'll tell you in 2 minutes" that was disseminated to all employees through internal communication channels, consisting of six deliverables on topics such as: gifts and hospitality, due diligence with third parties, management of conflicts of interest, free competition, protection of personal data and our compliance models.



United Kingdom



Action

Manage tax matters by applying good tax practice.

Description

We will facilitate access to information and prioritize non-judicial ways of resolving conflicts to strengthen relationships with tax administrations based on the principles of trust, professionalism, good faith, collaboration, loyalty and the search for understanding. We will keep engaging with EITI (Extractive Industries Transparency Initiative) and we will have a direct and fluent communication with the Customer Compliance Manager (CCM) at the HMRC (Her Majesty Revenues and Customs).

Indicator

Keep the direct relationship with the HMRC and publish the tax strategy in the UK in the web of the company.

What we've achieved



We have published our UK tax strategy in the web of the company, in line with our commitment to manage our tax affairs applying good tax practices and acting transparently.

We have kept engaging with EITI (Extractive Industries Transparency Initiative) and we have had a direct and fluent communication with the Customer Compliance Manager (CCM) at the HMRC (Her Majesty Revenues and Customs).



United States



Action

Promote cooperative relationships with tax authorities.

Description

We will continue to promote a cooperative relationship with the taxing authorities through participation in international cooperative programs and domestic engagement.

Indicator

Monitoring and engagement in new cooperation & transparency opportunities with tax authorities.

What we've achieved



We have continued to support transparency in tax compliance and to promote cooperative relationships with tax authorities such as the US Internal Revenue Service (IRS).

Open communication and transparency resulted in tax relief granted by the IRS to resolve double taxation.



Venezuela



Action

Train the main suppliers of the Venezuela Business Unit in the correct use of the SAP Ariba Network platform.

Description

We will carry out training activities that will allow suppliers to join and work properly in the SAP Ariba Network platform, with the objective of achieving more efficient and traceable bids for goods and services.

Indicator

Conduct training sessions with 15 suppliers of goods and services.

What we've achieved



We have conducted three online sessions on the correct use of the SAP Ariba Network platform, with the participation of five suppliers of goods and services from the Business Unit in each session, thus meeting the goal of 15 suppliers.



Venezuela



Action

Open information cycles on the Supplier Code of Ethics and Conduct with the main suppliers in our value chain, aimed at reciprocal benefit that establishes the minimum requirements according to which Repsol expects its suppliers to act.

Description

We will launch this initiative because Repsol believes that this Code articulates the behavioral guidelines that can be reasonably expected from responsible companies and expects our suppliers' managers to lead by example and support a corporate culture that promotes these values and evaluates performance against them.

Indicator

Conduct sessions with 15 suppliers of goods and services.

What we've achieved



We have conducted three online sessions on the company's Supplier Code of Ethics and Conduct, with the participation of five suppliers of goods and services from the Business Unit in each session, thus meeting the target of 15 suppliers.



Venezuela



Action

Train our employees on conflict of interest issues.

Description

We will conduct the compliance course "Conflict of Interest" on our digital online training platform. The module is part of the compliance training, everyone's responsibility, developed within the framework of the awareness campaign Hablando de Compliance, in which we will find the main keys on compliance for Repsol.

Indicator

Achieve self-training of 70% of the Venezuela Business Unit's personnel.

What we've achieved



We have exceeded the percentage of online self-training of Business Unit employees on conflict of interest in the framework of compliance management in the company.

In total, 131 out of 138 Business Unit employees have completed the online training, which represents a 95% participation rate.



Industrial Complexes



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A Coruña



Action

Draw up a communication plan on the development of the Project to transfer crude oil traffic to the Punta Langosteira Outer Harbour.

Description

We will keep our neighbours, the rest of the citizens, the media and the public and private entities in our area informed about the development of this transcendental project, which has a budget of 126 million euros.

Indicator

Provide 10 pieces of information about the project through different communication channels.

Establish, together with the contractor company, a specific information channel for the neighbours in relation to the works of the polyduct.

What we've achieved



We have produced 3 press releases and 5 informative contents on the project to move to the Outer Harbour. We have participated in a forum to analyze the present and future of Punta Langosteira and we have created a page on the refinery's website about the project. In addition, a communication plan has been established with information for neighbours: holding meetings, sending direct communications and creating, together with the contracting company, a neighbourhood attention service.



A Coruña



Action

Promote the economic development of the Complex's environment, ensuring fair competition and good practice in procurement and contracting processes.

Description

We will promote the participation of local companies in contracting processes in 100% of the cases where the local business fabric has the capacity to provide services.

Indicator

Invite the local business fabric to 100% of the tenders of the contracting processes in which they have the capacity to provide services.

What we've achieved



In 2021, 49 tenders were carried out from the Repsol Industrial Complex in A Coruña in which there were companies with a local presence with the capacity to provide the service. In all of them, these companies were invited to be present, which corresponds to 100% of the total.



A Coruña



Action

To have a 24-hour communication channel for citizens.

Description

Transparency is one of the values of the A Coruña Refinery. For this reason, it has a 24-hour customer service system so that any citizen can request information or ask questions about the activity.

Indicator Respond to 100% of incoming calls.

What we've achieved

In 2021 we have maintained the 24-hour customer service available to citizens, responding to 100% of communications, which in 2021 totalled 23 calls.



Cartagena



Action

Ensure transparency in Safety and Environment.

Description

We will produce the annual Safety and Environment report for the previous year.

Indicator Publication of the Safety and Environment report in 2021.

What we've achieved



In 2021, as part of the refinery's commitment to transparency, we published the Safety and Environmental Report for 2020 on the Industrial Complex's website.



Petronor



Action

Implement "TiketBai" billing to avoid tax avoidance.

Description

We will implement in billing, the necessary software to adhere to the "TicketBai" project of the Provincial Treasury of Bizkaia. In this way we will collaborate with the Treasury of the Basque Country in controlling the income produced by the activity of Petronor SA, in order to avoid tax avoidance.

Indicator

Proof of adherence dated December 31.

What we've achieved



Due to the COVID situation, the fiscal institution in Bizkaia has delayed the implementation date until December 31, 2024. However, Petronor will begin to apply it in 2022.



Puertollano



Action

Promote active communication and transparency with the society of Puertollano: media, Public Advisory Panel and entities of various kinds.

Description

We will maintain our communication policy with our stakeholders in a proactive and transparent manner, relying on different supports and means of dissemination. We will insist on highlighting those projects included in the 2021-2025 Strategic Plan announced by Repsol and we will reinforce our role as a source of reliable, committed and truthful information.

Indicator

Communicate the milestones achieved and committed to in the company's 2021-2050 Strategic Plan: 10 communications regarding the C.I. from Puertollano.

Collaborate with institutions, entities and associations through different and innovative initiatives: 10 collaborations.

Public Advisory Panel: hold 3 regular meetings and notify Puertollano society of the issues discussed.

What we've achieved



We have developed an extensive communication campaign on Repsol's Strategic Plan and on the projects contemplated in it for the Puertollano Industrial Complex. We have collaborated with different social entities, either through donations or by actively participating in their initiatives. We have intensified our relationship with the Public Advisory Panel with four meetings.



Puertollano



Action

Promote the economic development of the surroundings of the Industrial Complex, taking advantage of the potential of the business fabric of the area.

Description

We will promote the participation of local and regional companies in contracting processes in which their participation is possible and they meet the technical requirements. Having companies in the area allows us to act as a driving force in the economic development of our environment.

Indicator

We will promote the participation of local companies in contracting processes in 100% of the cases in which said companies have training.

What we've achieved



The specialization and technical capacity of the companies in the Puertollano region has made it possible to implement their participation in our contracting processes. We have met 100% of the objective and have invested more than 50 million euros in contracting goods and services with companies in the area.



Sines



Action

Inform the Authorities and other stakeholders of situations that may affect the community in matters related to health, safety and the environment.

Description

We will communicate to authorities and other entities emergency situations or potential emergencies relevant to environmental or safety issues that cause or may cause health or environmental impacts or risks.

Indicator

Report 100% of incidents in accordance with the criteria indicated in the two proposed actions.

What we've achieved



We have maintained open communication, informing the local authorities and other official and private entities, of all emergency or potential emergency situations that have originated in the Complex. In addition, we have proactively communicated to the local community relevant information on environmental or safety issues that may cause an impact or risk to health or the environment.



Tarragona



Action

Identify and respond to the information demands and concerns of society in relation to our activity to improve communication.

Description

We will apply the external communication plan that includes various mechanisms to maintain transparent and proactive communication with society, reporting on matters of interest to citizens, through, among others, press releases, updates to the content of the industrial complex's website and promotion of the Public Advisory Panel.

Indicator

Make more than 20 press releases during 2020.

Hold a minimum of 4 meetings of the Public Advisory Panel.

What we've achieved

We have applied the external communication plan to maintain transparent and proactive communication with society, reporting on matters of interest to citizens.

We have disseminated 24 press releases, we have updated the content of the industrial complex website and we have held 5 meetings of the Public Advisory Panel.



6 More Information



If you want to know more information about the Sustainability Plans in which you find these actions you can visit our website <u>repsol.com</u>

