



Anti-corruption Policy for Business Partners

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2 Objective

To define, establish and spread YPF S.A. anti-corruption guidelines, to ensure that all their business partners are familiar with applicable anti-corruption rules and can perform their commercial activities and agreements in collaboration with YPF with integrity.

3 Area of enforcement

YPF - Argentina (areas under control included).

This policy applies to all business partners, including, but not limited to, contractors, subcontractors, suppliers, consultants, and their respective members and any other third parties who conduct actions with and/or are linked with our company, working directly, representing us, for our benefit or on our behalf.

4 Main considerations

YPF focuses all its energy on always doing the right thing. YPF does not consent, under any circumstances, to offering, delivering, or receiving bribes, favors or any other kind of corruption. Its commercial activities and agreements are performed with integrity and responsibility, in compliance with all applicable anti-corruption rules. This is part of its values, and it is established within YPF Code of Ethics and



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Conduct. Doing the right thing not only makes the difference, but it is also the only way forward at YPF.

This policy is the main cornerstone of our Anti-Bribery Management System (ABMS). It is essential to comply with this policy and with its applicable requirements to ensure YPF ABMS works out.

This Policy promotes our company's integrity and reputation, keeping in mind that it is the sum of behaviors from everyone who is a member of YPF and those who operate on behalf of or along with YPF.

All business partners with whom YPF has a relationship are expected to understand the standards for ethical conduct which are provided in this policy and in YPF Code of Ethics and Conduct, and they are also expected to respect all applicable anti-corruption rules. YPF has developed a Third-Party Hiring Program to that effect.

4.1 Corruption and Bribery

Corruption can have many forms and it consists of performing dishonest or unlawful actions in exchange for influences, advantages, benefits, or valuable items. In the face of the intersection of factors such as opportunity, risk-benefit, or profits, which lead to corruption, we consider having an effective anti-corruption policy in place essential, which would allow us to identify our company's risks, foster our ethics, provide transparency in our business activities and agreements, and prevent any violation of applicable regulations.

Bribery is to promise, offer, deliver and/or receive something of value and/or any benefits, to influence decision-making or behavior and obtain or receive undue advantages.

The following are some of the cases that serve as examples of corruption:

- A business partner providing undue benefits to YPF personnel in exchange for an advance to speed up certification of services.
- A business partner providing undue benefits to YPF personnel with the goal of preventing them from complying with YPF internal procedures.
- A business partner, operating on behalf of YPF, providing undue benefits to a Public Officer in exchange for the approval/speeding up of procedures required for the fulfillment of the service they are providing YPF.



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4.2 Public Officers

Anyone who holds a public position or job, either by election or designation, and who works within National, Provincial, Autonomous City of Buenos Aires or Municipal Executive, Legislative and Judiciary branches. Anyone who acts in an official government capacity is considered a public officer. This definition also includes anyone who conducts public work, either as a government employee or as an employee of a public organization, or by providing public services.

For example: President, Vice President, Cabinet Chief, Minister, Secretary, Subsecretary, government employees, employees of public entities or public institutions such as universities and hospitals, judges, senators, deputies.

4.3 Valuable assets

The following may be considered as “valuable assets or items”: cash money, cash money equivalents, gifts, presents, hospitality, meals, recreational activities, entertainment, trips, jobs, contracts, payment of services in kind, or any other form or service with clear economic value.

4.4 “Compliance” area

YPF has a Compliance area that has its own budget, is independent and autonomous from other areas in the company and is responsible for spreading awareness about ethics, as well as ensuring their compliance throughout the entire organization.

This area is headed by a Chief Compliance Officer, who is responsible for ensuring the company’s Code of Ethics and Conduct and all other associated current rules are followed.

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5.1 Commitments, Responsibilities and Requirements

YPF has Zero Tolerance for Corruption of any kind, in relation to any situation or conduct involving, either directly or indirectly, any business partners who work with YPF.

YPF specifically forbids from promising, offering, giving and/or accepting, whether directly or indirectly, money and/or anything valuable and/or any benefits to public officers, private human or legal persons, entities that directly or indirectly represent anyone working for a public or private entity, political party and/or candidate to public office, with the purpose of illegally getting or keeping business or other undue advantages and/or abusing one’s real or apparent influence.



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All YPF personnel, as well as their business partners' personnel, are responsible for and obligated to comply with these anti-corruption standards and all various rules and regulations on this matter, as well as to reject and report any act of corruption.

5.1.1 Facilitating Payments

Facilitating payments to public officers are strictly forbidden at YPF, as well as any administrative action meant to ensure, advance, or speed up any routine public actions or procedures, regardless of its claim. This rule also applies to all our business partners who collaborate with our company either directly or indirectly or who operate on behalf of or representing YPF.

5.1.2 Gifts, Presents and Hospitality

In order to receive and deliver gifts, our business partners must follow the guidelines provided within YPF Code of Ethics and Conduct.

YPF forbids business partners from providing individuals with cash money or any valuables in order to obtain or keep business or earn any undue advantages which benefit YPF, either directly or indirectly, as is established within their Code of Ethics and Conduct.

Business partners cannot give Public Officers gifts on behalf of or in the interest of YPF or within the framework of actions performed in collaboration with our company, unless said gifts are courtesy gifts or diplomatic customs, i.e., merchandising and/or objects with institutional publicity. These exceptions are not applicable if YPF is linked with the agency to which the Public Officer belongs in any of the following ways: contractor; dealer or supplier; seeking certain decisions from the agency; participating in activities that are regulated or controlled by the organization; holding interests that may be affected by the organization's decision-making.

5.2 On the Obligation to Report with no Reprisals

All YPF personnel and all personnel from any business partners who know about and/or who have experienced any misconduct regarding compliance with this policy and any other associated rules and/or considers that they are being induced to accept, offer, or pay a bribe and/or perform any other kind of corrupt conduct, is obligated to report the situation immediately, using the company's available ethical reporting channels.

YPF guarantees safety, confidentiality, optional anonymity, and lack of reprisals throughout the development of their contractual and/or working relationship for those who use the Ethical Line in good faith.

5.2.1 Available channels or ways to submit reports

Business partners will be able to submit reports using the Ethical Line and reporting channels that are available on YPF website,



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in the Compliance section; or following this link:

<https://www.ypf.com/LaCompania/compliance/Paginas/Compliance-integridad-y-etica.aspx>

5.3 Commitment and constant improvement

Compliance area will provide specialized discussions and training for business partners. Additionally, this area will provide constant monitoring, reviews of this policy and the Anti-Bribery Management System before any regulatory changes, and internal updates to risk assessment and any other applicable updates.

5.4 On compliance with our Anti-corruption Policy for Business Partners, anti-corruption expectations and ethics and integrity standards.

YPF business partners should comply with the company's anti-corruption expectations and ethics and integrity standards.

Any commercial relationship, contract and/or agreement between YPF and a business partner will have to consider our Zero Tolerance for Corruption commitment, as well as our anti-corruption guarantees.

Business partners need to be aware, familiar, and committed to respecting human rights, in keeping with the national and international regulatory framework, and should exert their best possible efforts to provide a respectful working environment, free from harassment and discrimination, fostering diversity and gender equality and guaranteeing all people within the agency will receive the same opportunities to achieve their highest professional potential.

Business partners should promote a culture of ethical conduct and respect for human rights throughout their entire agency.

Likewise, business partners should communicate their knowledge and acceptance of their obligation to comply with this policy, the company's anti-corruption expectations, applicable rules, YPF Code of Ethics and Conduct and its associated policies.

5.5 Disciplinary measures in case of misconduct

The company may apply sanctions in case of failure to comply with this policy. Business partners involved in such failure to comply may be subject to termination of their commercial relationship and/or other relevant actions.



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5.6 Anti-corruptions Expectations

By accepting this document, the business partner acknowledges and accepts YPF Code of Conduct and Ethics and their associated Policies, all of which are available on YPF website and which they are obligated to bring to the attention of all their employees, especially those dedicated to providing services along with YPF, in agreement with the contract and commercial relationship that bind us.

YPF expects their business partners to comply and ensure compliance with the Ethical Values contained in YPF Code of Ethics and Conduct, among which their commitment to ZERO TOLERANCE FOR CORRUPTION is most notable. YPF expects and encourages everyone to respect and collaborate in complying with this commitment to keep building transparent relationships in line with the best ethical business practices, which meet our expectations.

Failure to comply with these expectations might result in termination of contract and commercial relationship.

5.7 Anti-corruption and Integrity Compliance Commitment

All third parties intending to become an YPF business partner must sign an Anti-corruption and Integrity Commitment Declaration, included in this regulation as Annex I.