



POLICY ON THE USE OF ALCOHOL, DRUGS AND PSYCHOACTIVE SUBSTANCES IN THE WORKPLACE

DECLARATION OF PRINCIPLES

1. Mission

This document aims to establish the guidelines and general principles on the prevention and control of risks associated with the misuse of alcohol, drugs and psychoactive substances in the workplace, ensuring that the operating procedures and internal policies of the companies making up the 'Pampa Group' (hereinafter, 'PAMPA') are in conformity with the applicable legislation in force.

All actions targeted at creating awareness and instructing PAMPA staff on the risks involved in the consumption of said substances in the workplace for the staff, third parties, the community at large and our companies' assets will go in that direction, as well as the procedures for risk prevention and control to be conducted within the Group's companies

2. Values

Through its Quality, Safety, Environment and Labor Health (QSELH) policies, PAMPA incorporates the recommendations of the International Labour Organization (ILO) and the World Health Organization (WHO) to address the problems generated by the misuse of alcohol, and/or drugs and/or other psychoactive substances, recognizing the practices aimed at preventing and eliminating the misuse of Alcohol, Drugs and Psychoactive Substances in the workplace as a desirable objective.

In this sense, Pampa Energía's Code of Business Conduct provides as follows:

"3.2.4 WEAPONS, DRUGS AND ALCOHOLIC BEVERAGES

With the commitment to safeguard the Staff's health, safety and productivity, Pampa deems it unacceptable, and therefore forbids the use of psychotropic drugs, alcohol and illegal drugs during the development of work activities and/or within the Company's facilities. Access to the Company's facilities under the influence of such substances, as well as their possession, distribution and/or commercialization, are strictly prohibited. "

Specifically, the general principles provided therein and the resulting guidelines and procedures should incorporate and adjust to the principles, rights and obligations provided for by the applicable national legislation in force, including, but not limited to, the Health and Safety at Work Act (Act No. 19,587), the Employment Contracts Act (Act No.20,744), the Problematic Consumptions Act (Act No. 26,934), the National Mental Health Act (Act No. 26,657) and the Personal Data Protection Act (Act No. 25.326).

Furthermore, prevention actions and proceedings to be established to such effect should also observe the legal provisions in force in each jurisdiction and the regulatory framework specific to each of the activities developed by the Group companies.

Therefore, pursuant to the current legislation in force and the recommendations of the above-mentioned international organizations, PAMPA considers that the misuse of alcohol, drugs and psychoactive substances should be deemed a blameless disease which, as such, is subject to the necessary prevention and



intervention actions in the workplace to safeguard the welfare and safety of the company employees, their families, third parties, the society at large, and the company assets in particular.

3. Commitment

In line with this policy, PAMPA will perform and support educational, informational and prevention campaigns targeted at its staff and their families on issues associated with the improper, excess and/or chronic use of alcohol, drugs and psychoactive substances, and the risks inherent in its effects in the workplace.

In turn, this being a dynamic and changing problem, PAMPA will adjust the provisions issued under these guidelines regarding the Company's Policy on the Use of Alcohol, Drugs and Psychoactive Substances whenever necessary, prioritizing the physical and psychological health and integrity of its employees and third parties associated with the company, as well as the social interest at large in the face of risks inherent in the specific activities of each of our companies.

To such effects, PAMPA undertakes to provide counsel and follow-up to all persons affected by the improper or chronic use of the above-mentioned substances, always ensuring the individuals' health and due respect for their intimacy and privacy.

4. Guiding Principles

4.1 Adequacy

PAMPA guarantees it will adjust the implementation of these guidelines to the factual circumstances of each specific case, taking special care to protect the intimacy and/or privacy of individuals. To such effects, a Prevention Procedure tailored to the circumstances of the specific activity and the applicable jurisdiction will be developed in all PAMPA assets, which will be informed to the employees of the Group companies, who will provide their consent, always in compliance with the principles of privacy and intimacy.

4.2 Care of Individuals

In each of its actions, PAMPA seeks to further social progress and, more specifically, the respect for fundamental human rights and the dignity and worth of the human person. In this sense, and recognizing the problems associated with the addictive and/or excess use of alcohol, drugs and psychoactive substances by employees in the workplace, the procedure to be followed should be instrumented as a concrete answer to possible consumption situations and the risks resulting from such situation.

4.3 Periodical Substance Controls

As part of the practical implementation of these guidelines and principles and in case their labor relationship so requires, PAMPA will conduct periodical tests of its employees and third parties geared at detecting the use of or dependence on alcohol and/or drugs and/or psychoactive substances. These controls will be made at the beginning of the work relationship, annually during its term, or randomly when there are signs that a person may be under the influence of the improper use of such substances, as long as this situation may constitute a direct risk for him or herself, endanger the life and/or health and/or welfare of that person or third parties, involve an occupational or social problem or disorder, or entail a risk for society at large, the company's activities, and/or the safety or integrity of its assets. Controls should be made with the prior express and positive conformity of the involved employees or third parties, which will be requested at the time of hiring or at any moment during the work relationship.



4.4 Scope of Controls and Exams

Under no circumstances will the information gathered during such controls exceed what is strictly necessary for complying with the purposes sought by this policy on the prevention and control of risks associated with the misuse of alcohol, drugs or psychoactive substances in the workplace; furthermore, such information will be limited, as long as medical and technical advances so permit, to the time frame which may have a direct incidence and/or impact on performance and attendance during working hours.

4.5 Prohibition of Access

Pursuant to the general principles stated herein, entry to the Group companies' facilities by any employee, supplier and/or third party when there are indications that he or she may be under the influence of the improper use of alcohol, drugs or psychoactive substances is strictly prohibited as long as it may constitute a risk for him or herself, other workers, the safety conditions under which the company operates, or their assets. The staff responsible for the entry and exit of the above-mentioned persons will immediately inform their superiors of any such situation, and will follow the rules and procedures to be passed to such effect.

4.6 Equality and Non-Discrimination

Provided they are on an equal footing, all PAMPA employees, as well as the above-mentioned third parties, will enjoy equal treatment in the application of the provisions of the procedure to be passed pursuant to the above-stated principles and the legal system as a whole. The provisions and procedures to be established will apply to all PAMPA's employees and officers without giving rise to any stigmatization or discrimination based on sex, gender identity, religion, marital status, race, political opinions, union membership, age, physical appearance, disability, hierarchy or others.

4.7 Inexcusability

The provisions stated herein and the proceedings to be established pursuant thereto will be deemed known by all PAMPA employees after the conclusion of the applicable information and outreach activities. In the absence of an Act of God or a Force Majeure event, ignorance of these provisions may not be used as an excuse to justify their breach, even if the impossibility to attend training actions is alleged, since they will be disclosed within the company and published in the standard media, including the Intranet and billboards the staff has access to.

4.8 Legality

Both these principles and the Proceeding to be developed thereunder comply with the legal framework in force in the Republic of Argentina and will be deemed known by all PAMPA employees.

4.9 Refusal to Undergo a Control

The refusal to undergo controls under the Prevention Proceeding will authorize PAMPA, as a first measure, to restrict the individual's access to the facilities to safeguard him or her, as well as the remaining staff and third parties present in the company facilities.

4.10 Lying by Omission

Employees will be informed of this policy and of their responsibility to notify the Company if they are unable to perform their regular duties because their senses are numbed, without the need to express the cause of such situation. This is why, in case an employee or officer enters PAMPA's facilities under the influence of the improper use of alcohol, drugs or other psychoactive substances, such situation will



be considered misconduct and will be sanctioned as such. The sanction will be a consequence of lying by omission and placing his or her life, integrity and health, as well as those of third parties', at risk. The provisions punishing such behavior will be aligned with the type of activity performed by the employee at the company's asset, depending on the risk involved and the level of impact inflicted.

4.11 Confidentiality

PAMPA respects the individuals' right to privacy and intimacy, as well as the right to medical confidentiality, especially in case problems associated with alcohol, drugs or psychoactive substances have been detected. Therefore, PAMPA undertakes to ensure the confidentiality of all its employees and third parties' personal information collected under the Prevention Procedures to be established as from the issuance of this Policy. This information may only be requested and analyzed by the area indicated in the applicable procedures, which will be responsible for taking measures to safeguard the safety and confidentiality of all information collected as a result thereof.

4.12 Corporate Social Responsibility

PAMPA recognizes the need to ensure its maximum contribution for a sustainable human development. This focus entails getting involved in social issues (in this case, the misuse of alcohol, drugs and/or psychoactive substances) aiming to promote the social welfare of groups and avoid damage, always with respect for the dignity of employees as human beings and a commitment with their families.

4.13 Follow-up and Control

Once misuse by a company employee is detected, he or she will be contacted by a multidisciplinary team for guidance and follow-up of the situation and its inherent problems and, if applicable, treatment will be encouraged through the services provided by the worker's health insurance or prepaid medical care institution.

In this way, the principles and guidelines stated herein will act as guidance for the design and implementation of proceedings for the prevention and control of risks associated with the abuse of alcohol, drugs and psychoactive substances in the workplace to be conducted within the companies of the Pampa Group to ensure the safety and integrity of workers, third parties, the society at large and the company, always safeguarding the due respect for the privacy and intimacy of workers.