

VIVO ENERGY GENERAL BUSINESS PRINCIPLES

March 2019

*Vivo Energy and the companies in which it directly or indirectly owns investments are separate and distinct entities. In this publication, the collective expressions 'Vivo Energy' and 'Vivo Energy Group' may be used for convenience where reference is made in general to those companies. Likewise, the words 'we', 'us', 'our', and 'ourselves' are used in some places to refer to the companies of the Vivo Energy Group in general. You should always assume that this Manual applies to you and if you have any doubt, you must contact the General Counsel and Head of Legal or the Ethics & Compliance Officer.

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VIVO ENERGY GENERAL BUSINESS PRINCIPLES

The Vivo Energy General Business Principles govern how each of the Vivo Energy companies which make up the Vivo Energy Group* conducts its affairs.

Our goal is to create a safe, growing, dynamic, exciting enterprise with the capability to deliver lasting benefits where they matter most - to customers, employees, local communities and the wider environment.

We want our employees to feel proud to work for Vivo Energy, and a key part of that is our belief that everyone deserves to be given responsibility and accountability in equal measure.

We will continue to set the highest standards for safety and environmental responsibility, actively engaging with local communities to see how and where we can make a positive difference.

We will always strive to introduce and market the best and most effective products and services. To win the enduring loyalty of our customers, we will listen to their concerns and aspirations, embrace new ideas and look to deliver real and valuable improvements wherever we can.

OUR VALUES

Vivo Energy employees share a set of core values - honesty, integrity and respect for people. We also firmly believe in the fundamental importance of trust, openness, teamwork and professionalism, and pride in what we do.

SUSTAINABLE DEVELOPMENT

As part of the Business Principles, we commit to contribute to sustainable development. This requires balancing short- and long-term interests, integrating economic, environmental and social considerations into business decision-making.

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RESPONSIBILITIES

We recognize five areas of responsibility. It is the duty of management continuously to assess the priorities and discharge these inseparable responsibilities on the basis of that assessment.

a. To shareholders

To protect shareholders' investment, and provide a long-term return competitive with those of other leading companies in the industry.

b. To customers

To win and maintain customers by providing products and services which offer value in terms of price, quality, safety and environmental impact, which are supported by the right technological, environmental and commercial expertise.

c. To employees

To respect the human rights of our employees and to provide them with good and safe working conditions, and competitive terms & conditions of employment. To promote the development and best use of the talents of our employees; to create an inclusive work environment where every employee has an equal opportunity to develop his or her skills and talents. To encourage the involvement of employees in the planning and direction of their work; to provide them with channels to report concerns. We recognize that commercial success depends on the full commitment of all employees.

d. To those with whom we do business

To seek mutually beneficial relationships with contractors, suppliers and joint ventures partners and to promote the application of these Vivo Energy General Business Principles or equivalent. The ability to effectively promote these principles will be an important factor in the decision to enter into or remain in such relationships.

e. To society

To conduct business as responsible corporate members of society, to comply with applicable laws and regulations, to support fundamental human rights in line with the legitimate role of business, and to give proper regard to health, safety, security and the environment.

LIVING BY OUR PRINCIPLES

Our shared core values of honesty, integrity and respect for people underpin all the work we do and are the foundation of our Business Principles.

The Business Principles apply to all transactions, large or small, and drive the behavior expected of every employee in every Vivo Energy company in the conduct of its business at all times.

We are judged by how we act. Our reputation will be upheld if we act in accordance with the law and the Business Principles. We encourage our business partners to live by them or by equivalent principles.

It is the responsibility of management to lead by example, to ensure that all employees are aware of these principles, and behave in accordance with the spirit as well as with the letter of this statement.

The application of these principles is underpinned by a comprehensive set of assurance procedures, which are designed to make sure that our employees understand the principles and confirm that they act in accordance with them.

As part of the assurance system, it is also the responsibility of management to provide employees with safe and confidential channels to raise concerns and report instances of non-compliance. In turn, it is the responsibility of Vivo Energy employees to report suspected breaches of the Business Principles to Vivo Energy.

The Business Principles are fundamental to how we conduct our business and living by them is crucial to our continued success.

PRINCIPLE 1 : ECONOMICS

Long-term profitability is essential to achieving our business goals and to our continued growth. It is a measure both of efficiency and of the value that customers place on the products and services that we offer. It supplies the necessary corporate resources for the continuing investment that is required to develop and produce future energy supplies to meet customer needs. Without profits and a strong financial foundation, it would not be possible to fulfill our responsibilities. Criteria for investment and divestment decisions include sustainable development considerations (economic, social and environmental) and an appraisal of the risks of the investment.

PRINCIPLE 2 : COMPETITION

Vivo Energy companies support free enterprise. We seek to compete fairly and ethically and within the framework of applicable competition laws; we will not prevent others from competing freely with us.

PRINCIPLE 3 : BUSINESS INTEGRITY

Vivo Energy companies insist on honesty, integrity and fairness in all aspects of our business and expect the same in our relationships with all those with whom we do business. The direct or indirect offer, payment, soliciting or acceptance of bribes in any form is unacceptable. Facilitation payments are also bribes and must not be made. Employees must avoid conflicts of interest between their private activities and their part in the conduct of company business. Employees must also declare to their employing company potential conflicts of interest. All business transactions on behalf of a Vivo Energy company must be reflected accurately and fairly in the accounts of the company in accordance with established procedures and are subject to audit & disclosure.

PRINCIPLE 4: POLITICAL ACTIVITIES

a) **Of companies**

Vivo Energy companies act in a socially responsible manner within the laws of the countries in which we operate in pursuit of our legitimate commercial objectives.

Vivo Energy companies do not make payments to political parties, organizations or their representatives. Vivo Energy companies do not take part in politics. However, when dealing with governments, Vivo Energy companies have the right and the responsibility to make our position known on any matters, which affect us, our employees, our customers, our shareholders or local communities in a manner, which is in accordance with our values and the Business Principles.

b) **Of employees**

Where individuals wish to engage in activities in the community, including standing for election to public office, they will be given the opportunity to do so where this is appropriate in the light of local circumstances.

PRINCIPLE 5 : HEALTH, SAFETY, SECURITY AND THE ENVIRONMENT

Vivo Energy companies have a systematic approach to health, safety, security and environmental management in order to achieve continuous performance improvement.

To this end, Vivo Energy companies manage these matters as critical business activities, set standards and targets for improvement, and measure, appraise and report performance externally.

We continually look for ways to reduce the environmental impact of our operations, products and services.

PRINCIPLE 6 : LOCAL COMMUNITIES

Vivo Energy companies aim to be good neighbors by continuously improving the ways in which we contribute directly or indirectly to the general wellbeing of the communities within which we work. We manage the social impacts of our business activities carefully and work with others to enhance the benefits to local communities, and to mitigate any negative impacts from our activities. In addition, Vivo Energy companies take a constructive interest in societal matters, directly or indirectly related to our business.

PRINCIPLE 7 : COMMUNICATION AND ENGAGEMENT

Vivo Energy companies recognize that regular dialogue and engagement with our stakeholders is essential. We are committed to reporting of our performance by providing full relevant information to legitimately interested parties, subject to any overriding considerations of business confidentiality. In our interactions with employees, business partners and local communities, we seek to listen and respond to them honestly and responsibly.

PRINCIPLE 8 : COMPLIANCE

We comply with all applicable laws and regulations of the countries in which we operate.

CONTACT DETAILS

www.vivoenergy.com

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