

ANTI-BRIBERY AND CORRUPTION MANUAL

Fighting Corrupt Practices

Ethics & Compliance

April 2025

Classification: Public

Contents

1. INTRODUCTION	5
1.1 What Is This About And Why?	5
1.2 Who Does This Apply To?	5
1.3 Business Responsibilities.....	5
2. MANDATORY REQUIREMENTS.....	6
2.1. Contracting Third Parties.....	6
2.2. Offering Or Receiving Gifts And Hospitality (G&H)	7
2.3. Funding Social Investments, Donations And Sponsorships.....	9
2.4. Conflicts Of Interest (COI).....	11
2.5. Political Payment And Trade Associations	12
2.6. Facilitation Payments.....	12
2.7. Recruitment	12
2.8. New Business Development, Including Set-Up Of Joint Ventures.....	13
2.9. Joint Ventures (Jv's)	13
3. MANAGING INCIDENTS AND REPORTING A CONCERN.....	14
4. KEY ROLES AND RESPONSIBILITIES	15
4.1 The Ethics And Compliance Office:.....	15
4.2 Businesses And Functions Are Accountable For:	15
5. ANTI-BRIBERY RED FLAGS.....	16
5.1 Contractors, Suppliers, Joint Ventures And Distributors.....	16
5.2 Hospitality And Travel.....	17
5.3 Accounts Payables	17
5.4 Cash Disbursements.....	17
5.5 General Audit Or Financial Reviews	18

6. EXAMPLES OF CONFLICTS OF INTEREST	18
6.1 Outside Employment / Directorship / Consultancy	18
6.2 Family Interest Or Personal Interest Or Relationship	18
6.3 Financial Or Other Participation In Contract / Supplier/ Customer / Business Partner Of VE.....	19
6.4 Outside Employment / Interests Which Are Classified As Government Official Duties	19

THE ANTI-BRIBERY AND CORRUPTION MANUAL

This Anti-bribery and Corruption (ABC) Manual for complying with laws that prohibit bribery of Government Officials and private individuals in the conduct of international business is owned by the Vivo Energy Chief Legal and Compliance Officer (CLCO). The CLCO has the authority to approve exceptions to the requirements of this Manual.

This Manual is classified as Restricted. Full or partial communication of this document outside Vivo Energy requires prior consent of the owner.

This Manual builds on the Vivo Energy General Business Principles (VEGBP) and the Code of Conduct. All Businesses and Functions must comply with the mandatory requirements of this Manual and with all applicable laws and regulations.

If there are any questions or an interpretation or exception is required to this manual the Compliance Officer must be consulted.

1. INTRODUCTION

1.1. What Is This About And Why?

Vivo Energy is subject to national and international laws prohibiting bribery and corruption. Vivo Energy employees, companies and Vivo Energy controlled joint ventures must comply with the US Foreign Corrupt Practices Act and the UK Bribery Act 2010, which have international effect, as well as all applicable anti-bribery legislation in the countries where Vivo Energy operates.

Bribery occurs when a payment, gift, favour or advantage is offered, made, sought or accepted to influence a business outcome. Serious penalties, including prison sentences, may be imposed upon those guilty of bribery. Bribery and corruption may involve Government Officials (GO), companies or private individuals, and may occur directly or indirectly through third parties (including joint ventures or their participants). Vivo Energy prohibits the payment of bribes.

1.2. Who Does This Apply To?

This *Manual* is mandatory for:

1. all companies in which Vivo Energy has a Controlling Interest, either directly or indirectly; and
2. Vivo Energy companies formally designated as the joint venture (JV) operator which must apply this *Manual* to the operation of the JV. For Non-Vivo Energy Operated Ventures, the appropriate Vivo Energy representative (see sections 2.8 and 2.9) must seek to influence the adoption of this *Manual* or materially equivalent standards and principles.

1.3. Business Responsibilities

Businesses and functions must ensure:

1. Staff understand their responsibilities to comply with applicable anti-bribery laws by following the requirements of this *Manual*;
2. Staff know how to report any suspicion or allegation of any breach of any anti-bribery laws or breach of this *Manual*'s requirements (by Vivo Energy or any individual acting on behalf of Vivo Energy) via the Vivo Energy Global Helpline (**AAB People**).
3. Contract Staff who are working on Vivo Energy's behalf or in Vivo Energy's name are instructed to act consistently with this *Manual*;
4. Staff and Contract Staff understand that turning a blind eye to suspicions of bribery or corruption can result in liability for Vivo Energy and for individuals; and

5. If there is any reason to believe that any activity is being engaged in with a corrupt purpose, even if it is technically permitted under this Manual, it must be reported (see section 3) and the CLCO must be consulted before proceeding.

Failure to act in accordance with applicable laws, the VEGBP, the Code of Conduct or this Manual may result in disciplinary action up to and including dismissal or contract termination.

2. MANDATORY REQUIREMENTS

2.1. Contracting Third Parties

Before entering into a contract with a Third Party, their integrity must be assessed through Know Your Counterparty (KYC) and any related issues or concerns addressed. All Third-Party contracts must include the latest appropriate ABC Clauses and a signed Compliance Statement should be obtained.

A Government Intermediary is a person or organisation that is engaged by Vivo Energy and has any direct or indirect dealings with a Government Official in connection with Vivo Energy's business, such as:

1. Freight forwarders, customs agents, visa processors, and consultants or business agents engaged to assist in obtaining Government contracts or permits.
2. Commercial agents who assist in obtaining Government contracts, concessions, permits or other Government-issued rights.
3. Professional agents: attorneys, accountants, lobbyists or other persons engaged on a professional basis to represent Vivo Energy in Government business or to lobby for a change in law.

2.1.1 Integrity Screening

1. Integrity screening is conducted in line with the Vivo Energy KYC Policy.
2. Integrity Screening does not replace the need for conducting broader, more comprehensive Due Diligence assessments where required or deemed appropriate depending on the nature of the anticipated relationship (e.g. HSSE, Financial, Legal, Operational, and Commercial assessments).
3. The Contracting and Procurement Procedures Manual (CPPM) provides more detailed guidance for Contracting and Procurement staff involved in Due Diligence on Contractors and Suppliers.
4. Contractors are expected to undertake Due Diligence on subcontractors. Where Vivo Energy's consent to subcontracting is required under the contract, such Due Diligence must

be undertaken prior to seeking Vivo Energy's consent. In exceptional circumstances, Due Diligence on the proposed subcontractor may be executed by Vivo Energy.

For further information, visit the Ethics & Compliance section on V-net for the Vivo Energy KYC Policy.

2.1.2 Records

All KYC and additional Due Diligence documentation and any follow-up actions must be kept as a Record and logged in the VE KYC Database.

If it becomes known or suspected that an engaged Third Party has made or will make a corrupt payment in connection with a Vivo Energy contract, all payments to that Third Party must immediately be stopped and the matter referred to the CLCO.

2.2. Offering Or Receiving Gifts And Hospitality (G&H)

G&H may carry a bribery risk. Therefore, only accepting G&H that are reasonable, proportionate, do not influence business decisions, and are not otherwise prohibited may be offered or accepted. All G&H meetings or the approved thresholds (see below) must follow required approval processes and be recorded in the Gifts and Hospitality online Register (G&H E-Register).

As a general principle, Vivo Energy discourages staff from accepting G&H from a business partner. Notwithstanding this, Vivo Energy recognises that the occasional acceptance or offer of modest G&H may be a legitimate contribution to good business relationships.

2.2.1 The Principles

Never offer, give, seek, or accept G&H that exceeds prescribed value limits. It is important to take note of the points below:

1. Make Vivo Energy policy on G&H known to your business partners.
2. Discuss corporate hospitality or sponsorship with your manager.
3. Comply with laws and regulations.
4. Following local customs is prohibited if they conflict with Vivo Energy policies.

You must register:

1. all G&H given to government officials.

2. any G&H perceived as creating a conflict of interest.
3. all G&H given or received from third parties that exceed allowed value limits.
4. all declined G&H that exceed allowed value limits.

For further information, visit the Ethics & Compliance section on V-net for the Vivo Energy Gifts and Hospitality E- Register.

2.2.2 Your Responsibility

You must not allow G&H to influence your business decisions or cause others to perceive an influence. If you are influenced or seek to influence someone, you can face legal or disciplinary action, including dismissal.

Decline G&H if you feel uncomfortable telling your line manager, supervisor, colleagues, family, friends, or the public that you have accepted any such gifts or hospitality.

2.2.3 Approval Thresholds Relating To Gifts

All Staff must record in the G&H E-Register and get line manager approval for accepting or offering gifts:

1. from any third party valued at **USD 150** or greater; or
2. to a private individual valued at **USD 150** or greater; or
3. to a GO valued at **USD 20** or greater; or
4. that could be perceived as influencing or creating a Conflict of Interest.

You may register gifts below these thresholds, and it is encouraged that all gifts (no matter what value) are registered to ensure maximum transparency.

2.2.4 The Following Restrictions Apply To Hospitality

1. No politically exposed persons or any government-related representatives may be involved.
2. No customers/suppliers or prospective customers/suppliers with upcoming tenders/contract renewals in the three months prior or post the event.
3. Hospitality is to be limited to the VE/counterparty employees. You may not include family members of the VE employee/ counterparties in invitations; and
4. Hospitality is to be limited to a single event (one match), to ensure that expenditure is not excessive.

2.2.5 Approval Thresholds Relating To Hospitality

2.2.5.1 At OU Level

1. All hospitality (given and received) must be pre-approved in writing by the EVP and the CLCO.
2. Pre-approval as per above is not required for unplanned meals not exceeding \$50 per person, however, this needs to be registered in the online register and approved by the MD.
3. Where the anticipated expenditure to host or anticipated expenditure on the VE employee by a third party is **at or above USD 1,500** per person, pre-approval in writing by the CEO and the CLCO.

2.2.5.2 At Central Level

1. All hospitality (given and received) must be pre-approved in writing by the Line Manager and the CLCO.
2. Pre-approval as per above is not required for unplanned meals not exceeding \$50 per person, however, this needs to be registered in the online register and approved by the Line Manager.
3. Where the anticipated expenditure to host or anticipated expenditure on the VE employee by a third party is **at or above USD 1,500** per person, pre-approval is in writing by the CEO and the CLCO.

2.2.6 Records

All documentation relating to the approval of the G&H and which is external to the G&H E-Register must be stored in accordance with the Vivo Energy Records Management and Archiving Policy.

2.3. Funding Social Investments, Donations And Sponsorships

Funding of social investments, donations, sponsorships and any other altruistic behaviour supports our values and reputation within the communities in which we operate. However, when not properly carried out, such funding also has the potential to damage our reputation by creating a perception of corruption or impropriety.

We must ensure that donations or sponsorships never improperly influence a business outcome, and that they are always made to a legitimate organisation and not to any individual.

All donations and sponsorships must be declared, regardless of value, in the online e-registers, and approved by the OU MD, prior to any funds being committed.

2.3.1 Approvals

All sponsorships and donations must be declared and approved, regardless of value, in the online e-registers, prior to funds being committed. The following is considered high risk S&D:

1. Cash commitments.
2. Donations made directly to government funds and sponsorships linked to any government or politically exposed person (PEP).
3. Commitments above **\$100 000**.

For high risk S&D, pre-approval must be sought from the MD, the EVP and CLCO. For commitments above \$100,000 additional approvals from CEO and the Chairman of the VE Board is required.

For further information, visit the Ethics & Compliance section on V-net for the Vivo Energy S&D Policy or the S&D E Register.

2.3.2 Your Responsibility

Before offering or committing any funds the following must be done:

1. Ensure that the proposed recipient is a legitimate organisation;
2. Identify whether any government organisation or PEP is involved (e.g., a PEP has requested the donation or sponsorship or a PEP is affiliated with the recipient of the donation or sponsorship);
3. For any funding above \$ 50,000 a formal KYC must be conducted to ensure that the necessary due diligence is performed on the recipient;
4. Obtain the necessary pre-approvals for all high risk S&D – no payment may be made without the required written approvals being obtained and submitted in the online S&D e-register in advance.
5. If the sponsorship or donation is linked to social investment, engage with the OU Corporate Communication Manager in order to ensure the relevant social investment requirements are followed;
6. Refrain from committing to any form of cash donation as far as possible. If cash commitments are considered, ensure the necessary approvals are obtained prior to making any commitments to third-parties.

2.3.3 Records

All documentation relating to the approval of the S&D and which is external to the S&D E-Register must be stored in accordance with the Vivo Energy Records Management and Archiving Policy.

2.4. Conflicts Of Interest (COI)

COIs must be avoided and, where an actual, perceived or potential COI occurs, it must be recorded in the Conflict of Interest E- Register (COI E-Register) for line management action.

COIs happen in situations where two or more competing interests conflict and impair an individual's ability to make objective decisions. Generally, a COI arises when private interests in any way interfere with Vivo Energy's interests. COIs do not necessarily have to result in unethical or illegal acts. COIs can arise when Staff take actions or have interests that may make it difficult to perform their Vivo Energy role objectively. It is important for Staff to avoid COIs, including potential COIs that could create the perception that they may be improperly influenced in their decision-making.

It is not possible to list all situations or relationships which may create a COI or the appearance of one, so each situation must be evaluated on its facts.

COIs can be damaging to Staff or to Vivo Energy. In some situations, a COI that has been fully disclosed to Vivo Energy may be acceptable, assuming appropriate mitigations have been agreed and implemented.

Businesses and Functions must ensure that:

1. All staff members submit an annual conflict of interest declaration on the COI E-Register.
2. Any changes or new possible conflicts that arise during the year must be declared on the COI Update E- Register.
3. Staff are aware of the need to declare any actual, perceived or potential COI in the COI E-Register;
4. Line managers agree and record any actions required to mitigate the COI in the COI E-Register; and
5. Any actual, perceived or potential COI that cannot be resolved in that manner is escalated to the Ethics and Compliance Office for advice on mitigating the COI.

For further information, visit the Ethics & Compliance section on V-net for the Vivo Energy Code of Conduct or the COI Register.

2.5. Political Payment And Trade Associations

As stated in the VEGBP, Political Payments or “in-kind contributions” must never be made by Vivo Energy companies or by Trade Associations with Vivo Energy funds. Vivo Energy companies must not take part in party politics.

Political payments that are classed as “In-kind contributions” such as the use of company facilities, resources, funds or premises for political activities such as rallies, campaigns, elections or political speeches are not permitted. If such requests from governments, political parties, organisations or their representatives are made, the CLCO must be consulted.

2.6. Facilitation Payments

A “Facilitation Payment” is a minor payment to induce a (usually low-ranking) Government Official to expedite or secure the performance of a routine duty which that person is already obliged to perform and where such payment would exceed what is properly due.

Where a Facilitation Payment has been requested the relevant line manager and the CLCO must be informed in writing as soon as possible.

The following are not Facilitation Payments:

1. Fees that are required by written law; and
2. A payment made in the good faith belief that life, health or safety may be in imminent danger.
3. The urgent processing of a regular government-provided service, against rates published by the government, for which payment is made into a government-administered account and for which an official receipt is given.

Vivo Energy, and all its affiliates, must comply with all laws and regulations in relation to facilitation payments in the jurisdictions in which it operates.

2.7. Recruitment

At an early stage in the process of recruiting any individual as an Employee into Vivo Energy, it must be determined whether that individual candidate is a Government Official (GO), former GO, or related to a GO and, if so, any related issues or concerns must be addressed.

The recruitment of a GO, former GO, or relative of a GO could be viewed as a favour or advantage potentially constituting bribery and/or may create a Conflict of Interest (COI). Such a COI may impair an individual's decision-making or jeopardise the reputation of the individual and that of Vivo Energy. In order to ensure that COIs can be mitigated, they must be identified at an early stage of the recruitment process.

Where a COI has been identified as part of the recruitment process, the person recruiting the individual must inform the Compliance Officer, who will then discuss with the CLCO, how to proceed and what mitigating actions need to be considered. If any successful applicant has a COI, they must make a declaration in the Conflict of Interest E Register (G&H E-Register) once they start in the role.

2.8. New Business Development, Including Set-Up Of Joint Ventures

Integrity Screening must be carried out on the relevant counterparties in line with Vivo Energy's KYC policy. The 25% threshold for screening of shareholding does not apply to JV's. All shareholders and owners of the proposed JV partner must be vetted regardless of their shareholding.

The level of due diligence depends on the counterparty risk and country risk of a transaction and should be started early in negotiations and completed before a Vivo Energy company enters into a binding commercial contract. Please refer to Vivo Energy KYC policy for more guidance on the approved process.

For all new JVs, the Project Manager must work with the CLCO and enhanced due diligence will be performed.

In the case of new NVEOVs, the Project Manager must also ensure the adoption of this Manual or its material equivalent.

2.9. Joint Ventures (Jv's)

2.9.1 VIVO ENERGY OPERATED VENTURES (Veovs)

Vivo Energy companies formally designated as JV operator must apply this Manual to the operation of the JV.

2.9.2 NON-VIVO ENERGY OPERATED VENTURES (Nveovs)

Vivo Energy may also be accountable under anti-bribery laws for the actions of NVEOVs. The Vivo Energy appointed director or, in the case of an unincorporated JV, management committee member (or the Shareholder Representative if a director has not been appointed) must seek the adoption of this Manual or materially equivalent standards and must take the following minimum steps to seek the adoption of an ABC programme:

1. Formally request to the JV board (or equivalent) that:
 - a. this Manual or a materially equivalent programme be adopted;
 - b. such requests and any responses are minuted and recorded; and
 - c. a performance report on the JV's ABC programme is submitted to the JV board or management committee annually.
2. Formally record Vivo Energy's objection to and request for remediation of any proposed or past payment of a bribe;
3. Formally record Vivo Energy's objection to any proposal to pay Per Diems or pay for gifts, hospitality or travel for any immediate family member of any Government Official and ensure that it is also recorded by the JV or its operator.
4. Notify the VE Compliance Office, via the annual declaration process, whether or not they consider that bribes have been paid by or to any employee of the JV; and
5. Store all records in accordance with the Vivo Energy Records Management and Archiving Policy.

The representative, or any other Vivo Energy employee working for a JV must notify CLCO within 5 days of he or she becoming aware of:

1. a bribe or a request for a bribe being made by or to any employee of the JV; or
2. a bribery-related allegation or investigation involving the JV.

VE Central Legal must be consulted immediately in cases where JV board members believe/consider that such notification may render them in breach of their fiduciary duties towards a JV company.

3. MANAGING INCIDENTS AND REPORTING A CONCERN

Vivo Energy has a duty to investigate all good faith allegations that a violation of the Code of Conduct or the law has occurred. The Vivo Energy Whistleblowing Policy is available on VNET under the Ethics and Compliance policies page.

Ensures that all Code of Conduct incidents are recorded appropriately and handled in accordance with the Vivo Energy Misconduct and Loss Reporting Policy that is available under the Ethics and Compliance policies page.

All allegations will be addressed confidentially, impartially and promptly by the Forensic Manager, the CLCO or the Head of Internal Audit. Vivo Energy companies are required to protect from retaliation anyone who makes a Code of Conduct allegation in good faith.

Any suspicion or allegation of any bribery and corruption violation or breach of this Manual's requirements (by Vivo Energy or any individual acting for Vivo Energy) must be reported to the Vivo Energy Global Helpline website <https://fileaconcern.org/vivoenergy> which can be contacted anonymously. Alternatively, Staff may contact their line manager or supervisor, the Forensic Manager, the Ethics and Compliance Office, Legal or HR.

4. KEY ROLES AND RESPONSIBILITIES

4.1. The Ethics And Compliance Office:

1. reviews the existing and emerging risks of bribery and corruption;
2. assesses the effectiveness of current policies, governance, training and controls in risk mitigation;
3. reviews the status of implementation of the programme, issues faced by the Group and resolves/escalates or recommends appropriate action;
4. recommends improvements to the CLCO;
5. conducts bribery assessments in accordance with the Vivo Energy Anti Bribery Management System (ISO 37001)

4.2 Businesses And Functions Are Accountable For:

1. determining the key legal and ethical compliance risks in their respective Business or Function;
2. ensuring actions are taken to manage the identified risks in a sustainable manner;
3. implementation in terms of controls and communicating the requirements of the ABC programme;
4. identifying those roles determined to be "at risk" and nominating Staff for ABC training;
5. ensuring all nominated Staff complete the ABC training or refresher training within the identified timeframe;
6. ensuring compliance by their Staff with the requirements of this Manual; assessing the risks of legal and ethical non-compliance and ensuring these are considered relevant to plans, decisions and operations; and

7. monitoring, communicating and reporting changes in the risk environment.

5. ANTI-BRIBERY RED FLAGS

5.1. Contractors, Suppliers, Joint Ventures And Distributors

1. Counterparty recommended by a Governmental Official or customer.
2. Shareholders of the counterparty include high-level Government Officials.
3. Information gathered reveals that the counterparty makes political contributions or has links to Government Officials.
4. Incomplete or inaccurate information is provided in required disclosures.
5. Abnormal procurement requests (eg: requests are made for unusually large or excessive discounts or commissions.).
6. Requests are made for reimbursement of expenses that are poorly documented or non-transparent.
7. The counterparty refuses to comply with the due diligence process (eg: refuses to provide ownership documents).
8. The counterparty appears to be a "briefcase company" or a lack of experience or "track record" with product field or industry.
9. There is evidence suggesting off-book accounts or multiple accounting records.
10. Internal controls or other controls appear not to be adequate to meet required Company standards.
11. There is a failure to comply with standards set in the VEGBP and the Code of Conduct.
12. There is a failure to abide by appropriate delegations of authority or other notification and approval procedures.
13. Responsibility for authorizing, recording, controlling, and reviewing of payments has been improperly consolidated.
14. There are failures to obtain signoffs or opinions from applicable local outside auditors.
15. Requests for cash payments are made.
16. Actual payments made do not match the contract terms.
17. Requests are made for unusually large or excessive fees, commissions, reimbursement of expenses that are poorly documented or non-transparent, payments to a different bank account or other payments to third parties.
18. The counterparty lacks awareness of Anti-Bribery Laws, resists acknowledging VE Third Party Code of Conduct or, if a corporate organisation, lacks an effective anti-bribery compliance programme.
19. The counterparty lacks facilities or qualified staff, has a lack of experience with product field or industry or operates through a company with little or no assets.

20. There is reason to believe there is or may be a violation of local law or policy (e.g. prohibitions on commissions, currency or tax law violations) in the arrangements proposed by the counterparty.

5.2. Hospitality And Travel

Employee expense vouchers and corporate credit card reimbursement indicates:

1. Lack of adequate or inconsistent supporting documentation.
2. Lack of proper approval.
3. Failure to follow recordkeeping procedures.
4. Suspicious or illegitimate expenses.
5. Requests for a per diem for a Government Official.
6. Evidence of double dipping (e.g. paying expenses and a per diem).
7. Requests for travel expenses of family members or for additional paid travel not directly related to company business.

5.3. Accounts Payables

1. Evidence of any of the following improper recording of A/P liabilities or purchases:
 - a. Lack of invoices or receiving documents.
 - b. Activity not properly posted to general ledger or subsidiary ledger.
 - c. Disbursements or purchases not recorded in proper period.
2. Evidence indicates incorrect amounts recorded for A/P liabilities or purchases such as:
 - a. Double invoicing and/ or duplicate payments.
 - b. Incorrect amounts for payments.
 - c. Incorrect prices, rates, or quantities.
 - d. Lack of adequate or inconsistent supporting documents.

5.4. Cash Disbursements

1. Evidence indicates inadequate controls over cash disbursements or manual checks
2. Responsibility for cash, checks, and bank reconciliation has been improperly consolidated.
3. Evidence of cash payments from other than an established petty cash account.
4. Lack of documentation for petty cash transactions.
5. Excessive petty cash activity.
6. Evidence of use of petty cash for large expenditures.

5.5. General Audit Or Financial Reviews

1. Evidence suggests off-book accounts or multiple accounting records.
2. Evidence of failure of general ledger account reconciliations associated with Cash, A/P or purchasing, including failure to adequately trace bank statements to the A/P ledger.

6. EXAMPLES OF CONFLICTS OF INTEREST

It is impossible to list all actual or potential COI but the list below gives some examples – if you are unsure then speak with your line manager or the VE Ethics and Compliance Office.

1. Outside employment/directorship/consultancy.
2. Family interest or personal interest or relationship.
3. Financial or other participation in contract/supplier/customer/competitor/Business partner of Vivo Energy.
4. Outside employment/interests which are classed as Government Official duties.

6.1. Outside Employment / Directorship / Consultancy

1. Having a second job.
2. Holding a financial interest.
3. Performing services.
4. Serving on a board of directors.

If employee is asked to serve on the board of directors of another organisation, before accepting a position as a board member (including for not-for-profits), you must contact HR.

Any of the above relating to a third-party organisation that is a competitor, customer or supplier of goods or services to Vivo Energy, may raise a COI, or the appearance of a conflict of interest. (The same is true if the relationship is with an organisation that is seeking to become a competitor, customer or supplier.) Some arrangements of this kind are never permissible. For example, you must never work or provide services for anyone that you deal with as part of your job for Vivo Energy.

6.2. Family Interest Or Personal Interest Or Relationship

1. A 'close relative' working or performing services for a competitor, customer or supplier. (A 'close relative' means a spouse, partner, parent, stepparent, child, stepchild, sibling, stepsibling, nephew, niece, aunt, uncle, grandparent, grandchild and in-law.).
2. A relative that may have business dealings with you, with anyone working in your business unit, or with anyone who reports to you.

3. Hiring a relative - you should never be in a situation where you have the ability to hire, supervise, affect terms and conditions of employment, or influence the management of any close relative, regardless of whether that person is a Vivo Energy employee or employed by a Vivo Energy contractor.

6.3. Financial Or Other Participation In Contract / Supplier/ Customer / Business Partner Of VE

When deciding whether an investment might create a COI, ask yourself these questions:

1. Would the investment affect any decisions I will make for my company?
2. How would the investment seem to others inside my company, such as my co-workers – would they think it might affect how I do my job for the company?
3. How would it look to someone outside the company, such as a customer or shareholder, or even in a newspaper?

6.4. Outside Employment / Interests Which Are Classified As Government Official Duties

1. A prospective or actual candidate for a national parliament.
2. A local councillor.
3. A member of a central government advisory board, a direct government advisor or a diplomatic role or function.
4. Any judicial role within a Court system or member of any statutory tribunal (e.g. an employment tribunal).
5. A school governor or a member of the managing or governing body of an educational establishment.
6. A member of a police authority, including those working as part-time police officers.
7. An advisory board that comments and/or supports and/or rejects permits Vivo Energy is seeking.
8. Tax collector.