



# THIRD PARTY CODE OF CONDUCT

Ethics & Compliance

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Classification: External

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## **1. INTRODUCTION TO OUR THIRD PARTY CODE**

Our vision is to become Africa's most respected energy business. We place great emphasis on operating our business with high ethical standards and in a socially responsible way.

We want to work with Counterparts that share our values. Our Third Party Code sets out the key principles upon which we require all of our Counterparts to apply.

Given the importance of the Third Party Code to our Business, we reserve the right to audit our Counterparts to monitor adherence.

## **2. MINIMUM STANDARDS**

### **2.1. Human Rights And Modern Slavery**

We strongly support the elimination of all forms of modern slavery. Such exploitation is entirely at odds with our core values of safety, excellence, caring, integrity, and respect for people.

We require that all of our Counterparts abide by the principle that their workers are employed on a freely agreed and voluntary basis.

### **2.2. Respect And Dignity**

We require our Counterparts ensure that all workers are treated with respect and dignity. No worker is subject to any harassment (including but not limited to physical, sexual, psychological or verbal harassment), abuse or other form of intimidation.

### **2.3. Child Labour Is Not Used**

Under no circumstances will we or our Counterparts employ individuals under the local legal minimum age for work or, if higher, the age at which mandatory schooling ends in the respective country. No one under the age of 18 should carry out work that is mentally or physically hazardous, or work at night.

## **2.4. No Discrimination Is Practised**

We are committed to ensuring that all employees work in an environment that promotes diversity and where there is mutual trust, respect for human rights, equal opportunity and no unlawful discrimination or victimisation.

We want to work with Counterparts that similarly celebrate cultural and individual diversity and do not discriminate or tolerate discrimination or harassment based on grounds such as race, religion, colour, ethnicity, national origin, disability, sexual orientation, gender or marital status.

## **2.5. Health And Safety**

We are committed to a Goal Zero of no accidents, no harm to people and no damage to the environment. To support this goal, we require that each of our Counterparts ensure that a risk assessment is undertaken to identify, and a plan put in place to eradicate, unsafe behaviours conditions or practices. Employees should receive training on how to minimise the risks of illness or injury associated with their work and be provided with suitable protective equipment where needed.

## **2.6. Land Acquisition And Impact On Our Community**

We want to be a positive force and make a real and lasting difference in the communities where we operate. This means that we need to respect the rights of and title to property and land of individuals, indigenous people and that local communities are respected.

We require from both ourselves and our Counterparts that all negotiations with regard to their property or land, including the use of and transfers of it, adhere to the principles of free, prior and informed consent, contract transparency and disclosure.

## **2.7. Impact On The Environment**

We recognise that we have a responsibility towards the environment beyond legal and regulatory requirements. We are committed to reducing our impact and continually improving our environmental performance as an integral part of our business strategy and operating methods. We expect our Counterparts to support this.

## 2.8. Fair Competition

We believe in vigorous yet fair competition and support the development of appropriate competition laws. While we need the help of our Counterparts to succeed, it is critical that we work together within the confines of fair competition and all applicable regulations.

We require all of our Counterparts to have effective policies and procedures in place to proactively prevent any anti-competitive conduct, including ensuring that its work force is sufficiently trained and familiar with the competition laws that are relevant and to their market and activities.

## 2.9. Conflicts Of Interest

Conflicts of interest can arise when personal, family, financial, political or other interest may be seen to interfere in the commercial relationship between our two businesses. For example, your employees may have relatives or close personal friends employed by Vivo Energy and we expect these to be disclosed.

Our Counterparts must disclose in full any potential conflict of interests that they (or their directors, employees or contractors) have, or may have, with us as soon as it has been identified so that it can be properly considered and the right action taken. In many cases, simply disclosing the conflict will be enough to resolve the problem. In more complex situations, further action may be needed.

## 2.10. Anti-Bribery And Corruption

Violations of anti-bribery, anti-corruption laws, and other similar regulatory requirements are completely unacceptable.

We insist that all of our Counterparts have a prohibition on any and all forms of bribery and corruption, and have adequate procedures in place to proactively prevent and detect bribery in all commercial dealings that they undertake.

You must inform us straight away once you become of any attempt to bribe an employee of ours or where you believe an employee or agent of ours is attempting to bribe or inappropriately influence someone else. Any report should be made in accordance with section 3 of this policy.

## 2.11. Gifts And Hospitality

Any business entertaining or hospitality with us must be kept reasonable in nature, entirely for the purpose of maintaining good business relations and not intended to influence in any way our decisions about how we award future business. Gifts of cash or the granting of loans to our employees or agents are completely unacceptable.

## 2.12. Data Protection And Privacy

We are committed to ensuring the right to privacy of individuals on whom personal data is processed, in the course of conducting our business, is respected and shall comply with all applicable data protection and privacy laws relevant to the processing of Personal Data. This includes without limitation, the General Data Protection Regulation (Regulation (EU) 2016/679) the "GDPR" and applicable laws in the countries where we operate. All Counterparts entrusted to process personal data on behalf of Vivo Energy as a Data Processor shall take all reasonable measures to ensure the protection of personal data which comes into their possession and shall apply all reasonable standards required to comply with applicable data protection law.

## 2.13. Audit And Verification

Given its importance, we reserve the right to verify our Counterparts compliance with our Third Party Code. If we find shortcomings that in our opinion can be remediated, we will work with our Business Partner to agree a time-bound remediation programme.

We reserve any right we may have to terminate our agreement with a Counterpart, if, in our reasonable opinion, the short-comings cannot or have not been remedied.

## 3. Reporting Of Concerns

We expect our Counterparts to provide their staff with a safe and confidential channel to raise concerns and report instances of their non-compliance which does not tolerate retaliation. If they see something that is of concern involving Vivo Energy businesses or activities this can be reported to VE local management, the VE Ethics and Compliance Office or via the Vivo Energy Global Helpline, **AAB People**, that is available 24 hours a day, 365 days a year.

Concerns can be reported as follows:

### **3.1 By completing an online web report via the AAB People website**

You can fill in a form to submit your query or concern.

The website is available in 24 languages, including English, French, Portuguese, Dutch and Arabic and is available to all our third parties as well as Vivo Energy employees.

The Global Helpline website is <https://fileaconcern.org/vivoenergy>

### **3.2 By ringing your International Toll-free number (ITFN) in the country you are based**

You can call the helpline from any country in which Vivo Energy operates.

Calls to International Toll-Free Numbers in most countries are free from landlines. Please note that mobile access in some global regions may not be fully supported and that charges may be incurred to the caller based on their own individual telephone subscription.

If requested an interpreter can be brought into the call to assist the English-speaking interviewer.