



WHISTLE- BLOWING POLICY

Helping you live by our core values and our general business principles

Ethics & Compliance

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1. FOREWORD

Reporting and addressing suspected violations of the law or the Vivo Energy General Business Principles (VE GBP) is of critical importance in protecting our reputation and the value of our brand. To ensure we are aware of and responding to all such suspected violations, the Vivo Energy Compliance Office manages the Helpline and retains the services of an independent firm **AAB People**, to receive, via Internet and telephone lines, information, and complaints regarding possible violation of laws, regulations, the Vivo Energy Code of Conduct, and the VE GBP.

2. WHAT IS THE VE GLOBAL HELPLINE

The Vivo Energy Global Helpline enables Vivo Energy employees and others to raise concerns or dilemmas, or to seek advice on a matter related to compliance with the law and our business principles (VE GBP) and Code of Conduct, in full confidence and without fear of retaliation.

The following wrong doings should be reported:

No	Type	Description
1.	Fraud	Any intentional or deliberate act to deprive another of property or money by guile, deception, or other unfair means.
2.	Bribery	Bribery is a specific offence which concerns the practice of offering something, usually money, to gain an illicit advantage.
3.	Corruption	Corruption is a form of dishonest or unethical conduct by a person entrusted with a position of authority, often to acquire personal benefit.
4.	Theft	The unauthorized removal or taking of supplies, equipment, furniture, fixtures, products, cash, merchandise, or other tangible property.
5.	Financial Mismanagement	Statements or actions that encourage or result in false or intentionally misleading entries into accounting, auditing, or financial records.
6.	Discrimination	Statements or actions based on age, race, colour, national origin, sexual orientation, gender, disability, or religion that are

No	Type	Description
		the basis for employment, promotion, or compensation decisions
7.	Harassment	Persistent statements, conduct or actions that are uninvited, degrading, offensive, humiliating or intimidating and create an unpleasant or hostile environment.
8.	Retaliation or Retribution	Statements or actions discharging, demoting, suspending, threatening, harassing or discriminating against an employee because of any lawful act taken by such employee in connection with reporting a violation of law or policy, filing a complaint, or assisting with an investigation or proceeding.
9.	Environment, Health and Safety	Conduct, actions, policies, or practices that either violate local, provincial or federal environmental, health or safety laws or regulations or may cause or result in potentially hazardous conditions that impact the environment or the health or safety of employees, customers or others.
10.	Bullying	The use of force, threat, or coercion to abuse, intimidates, or aggressively dominate others. The behaviour is often repeated and habitual.
11.	Data Breaches	The Loss of data or unauthorised sharing of data.

3. WHO CAN USE THE GLOBAL HELPLINE

The Vivo Energy Global Helpline is for all employees and contract staff in Vivo Energy and for third parties with whom Vivo Energy has a business relationship (such as customers, suppliers, agents) if they observe wrongdoing by a Vivo Energy company or employee.

This facility is not for customer service complaints or enquiries.

4. HOW CAN I RAISE A QUERY OR CONCERN VIA THE GLOBAL HELPLINE

The Global Helpline is available 24 hours a day, 365 days a year. Calls and reports over the Helpline are received on behalf of Vivo Energy by an independent third-party specialist whistleblowing provider, AAB People. They are based in the UK. There are two ways to submit a report/complaint:

4.1 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>

4.2 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.

The local helpline numbers are as follow:

Country	Line Number
Botswana	0026 483 380 0109
Burkina Faso	00229 61 509 897
Cape Verde	00224 660 710 310

Country	Line Number
Cote D'Ivoire	00229 61 509 897
DRC	TBC
Eswatini	0044 207 660 8272
Gabon	00263 24279 9995
Ghana	0023 32424 26321
Guinea	224 660 710 310
Kenya	0023 3242 426 321
Lesotho	0044 207 660 8272
Madagascar	261 336 545 546
Malawi	224 660 710 310
Mali	0023 3242 426 321
Mauritius	08020440218
Morocco	800 092288
Mozambique	00263 24279 9995
Namibia	00264 833 800 109
Netherlands	0800 022 2398
Reunion	0800 90 91 15
Rwanda	00229 61 509 897
Senegal	00 44 121 629 0395
South Africa	0800 990 094
Tanzania	0800 12 0093
Tunisia	00229 61 509 897
UAE	8000 178 171
Uganda	00256 205 494 264
UK	0800 056 2539
Zambia	00263 24279 9995
Zimbabwe	00263 24279 9995

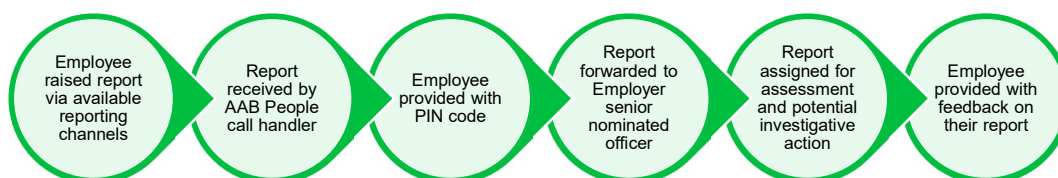
5. WHAT WILL HAPPEN WHEN I CONTACT THE GLOBAL HELPLINE

You can communicate anonymously or you can provide your details confidentially, whichever you prefer.

Provide as much information as possible about your concern, but keep it relevant, especially if you are making an allegation about another person.

All reports of a concern on the web, via email or by phone will result in a report that is passed to an Employer Senior Nominate Officer of Vivo Energy for further action.

The process for confidential reporting is as follows:



6. WHAT HAPPENS TO A REPORT WHEN RECEIVED BY VIVO ENERGY

Your report is passed to an Employer Senior Nominate Officer for appropriate assessment.

If the report is a query, or perhaps a dilemma for which advice is sought, it will be passed to someone qualified to provide that advice. If the report is in the nature of an allegation that requires careful investigation, an investigation team will be assigned.

Details of the case, and especially the identity of the person who made the report and any persons mentioned in the report, are kept confidential and only shared on a strict need-to-know basis. The investigation itself will focus on an objective, factual analysis of the case. In the event that an allegation has been found to be true, the local OU will decide on the action or actions to be taken.