

VIVO ENERGY

WHISTLEBLOWING POLICY

Helping you live by our Core Values and our
General Business Principles

Classification: **PUBLIC**

*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 Office.



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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, 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 the basis for employment, promotion or compensation decisions

No	Type	Description
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 Helpline provider, SeeHearSpeak. They are based in the UK. There are three ways to submit a report/complaint:

1. Visit the Global Helpline 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 <http://www.seehearspeakup.co.uk/en/file-a-report>

You will need your username and password to login. The details are as follows:

USERNAME: Vivoenergy

PASSWORD: Vivo858

2. Send an email

Alternatively you can email your concerns to SeeHearSpeak at report@seehearspeakup.co.uk.

When emailing please state **VIVO ENERGY** in the subject header.

3. Call the Global Helpline in your country

You can call the helpline from any country in which Vivo Energy operates without any charge.

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	Line Type
Botswana	0026 483 380 0109	Toll Free Line
Burkina Faso	00229 61 509 897	Local Line
Cape Verde	00224 660 710 310	Local Line
Cote D'Ivoire	00229 61 509 897	Local Line
Gabon	00263 24279 9995	Local Line
Ghana	+23 32424 26321	Local Line
Guinea	224 660 710 310	Local Line

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Country	Line Number	Line Type
Kenya	+23 32424 26321	Local Line
Madagascar	261 336 545 546	Toll Free Line
Malawi	224 660 710 310	Local Line
Mali	+23 32424 26321	Local Line
Mauritius	08020440218	Local Line
Morocco	00263 24279 9995	Local Line
Mozambique	00263 24279 9995	Local Line
Namibia	+26 483 380 0109	Local Line
Netherlands	0800 022 2398	Toll Free Line
Reunion	0800 90 91 15	Toll Free Line
Rwanda	00229 61 509 897	Local Line
Senegal	0044121 629 0395	Temporary Line
South Africa	0800 990 094	Toll Free Line
Tanzania	0800 12 0093	Toll Free Line
Tunisia	00229 61 509 897	Local Line
UAE	8000 178 171	Toll Free Line
Uganda	000256 41 423 8184	Local Line
UK	0800 056 2539	Toll Free Line
Zambia	00263 24279 9995	Local Line
Zimbabwe	00263 24279 9995	Local Line

5. WHAT WILL HAPPEN WHEN I CONTACT THE GLOBAL HELPLINE

You can communicate anonymously or you can provide your details, whichever you prefer. However in both instances your report will remain confidential.

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 Authorised Receiver of Information? (ARI) of Vivo Energy for further action.

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

Your report is passed to an ARI 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 operating company will decide on the action or actions to be taken.

CONTACT DETAILS

Ethics and Compliance V-NET site:

<http://vnet.vivoenergy.local/Function/ethicscompliance/SitePages/Home.aspx>

EthicsandComplianceOffice@vivoenergy.com