

VIVO ENERGY

CODE OF CONDUCT

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

Ethics & Compliance

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*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 Chief Legal and Compliance Officer

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1. THE CODE OF CONDUCT

This is your Code of Conduct and it is relevant to you. Read it. Understand it. Follow it.

The rules and guidelines contained in this handbook are the boundaries within which every Vivo Energy employee must operate every day. The Code does not exempt anyone. Following our core values and Business Principles, the Code of Conduct instructs and advises you how to avoid situations that may cause damage to you or Vivo Energy. It sets high standards and shows you how to achieve them.

WHAT... IS THE CODE OF CONDUCT?

- » Rules
- » Standards
- » Expected behaviours

WHO... IS THE CODE OF CONDUCT FOR?

Every employee, director or officer in every wholly-owned Vivo Energy company and in every Joint Venture company under Vivo Energy control must follow the Code of Conduct. Contract staff must also acknowledge and follow the Code. Contractors or consultants who are our agents or working on our behalf or in our name, through outsourcing of services, processes or any business activity, will be required to act consistently with the Code when acting on our behalf. Independent contractors or consultants will be made aware of the Code as it applies to our staff in their dealings with them. Joint Venture companies not under Vivo Energy control are encouraged by Vivo Energy to adopt similar principles and standards.

WHY... DO WE NEED A CODE OF CONDUCT?

To describe the behaviour expected of our employees and how they relate to our Business Principles and core values.

Our Business Principles

- Economic
- Competition
- Business Integrity
- Political Activities
- Health, Safety, Security & Environment
- Local Communities
- Communication and Engagement
- Compliance

Our core values

- Honesty
- Integrity
- Respect for people

HOW... CAN THE CODE OF CONDUCT HELP YOU?

Inside you will find practical advice about laws and regulations, expectations and guidance. We also provide directions to further information sources to help you use your own good judgement.

2. INTRODUCTION

The principles of ethical business behaviour are laid down in the Vivo Energy General Business Principles and the Code of Conduct. The General Business Principles govern how Vivo Energy companies conduct their affairs. This Code of Conduct describes the behaviour Vivo Energy expects of you and what you can expect of Vivo Energy. The language is not legalistic and the Code is more than a set of rules. It should be viewed as an essential guide. The values underlying the Business Principles and the Code of Conduct are unambiguous, obvious and universal – honesty, integrity and respect for people. Your conduct will be judged by how you live by those values, and how you have met the intention and spirit of the principles in the Code.

In some cases you may need to read more detailed material to understand fully what is required.

You also have a responsibility to accept personal invitations to training on the topics highlighted in this Code.

Vivo Energy Helpline

Throughout the Code you will see situations in which you are expected to contact the Vivo Energy Helpline and report or seek advice about your concerns. You can do so by reporting or talking to:

- your line manager or supervisor;
- any other senior Vivo Energy person with whom you feel comfortable to have such a conversation, or to whom you could send an email or letter, e.g. a Human Resources or Legal representative or the Compliance Officer; or
- the Vivo Energy Helpline (anonymously if you prefer), the numbers of which can be found at the Vivo Energy Ethics and Compliance V-net site.

The Helpline is open 24 hours a day, seven days a week through a local telephone number in each country or through the Internet. Individuals calling the Helpline will talk in confidence to an experienced, independent operator. Their reported concerns will be logged and handled in accordance with consistent case management and investigation guidelines. Questions will be channelled to people who can answer them.

In the Code we mention specific areas where a breach of the Code is likely to carry severe consequences. But all breaches may involve serious consequences up to and including dismissal, and in some cases fines and imprisonment.

Vivo Energy retains the right to monitor staff use of technology, systems and procedures closely in order to ensure compliance with the Code and Vivo Energy policies.

3. CEO MESSAGE

Reputation is the most important asset to Vivo Energy and we must make sure that we keep this to the highest standard by conducting business with integrity and with respect. Success means acting with the highest standards of corporate behaviour towards our employees, our customers, those with whom we do business and our shareholders.

We want to be respected by all our stakeholders throughout Africa, but we can only achieve this if all of our employees behave correctly, all of the time.

Our Code of Conduct represents our core values. They underpin all the work that we do and are the foundation of our business. They must always be upheld; in whatever situation we find ourselves in. The Code provides a framework of simple Musts and Must nots to ensure that these standards of conduct are followed by everyone. It builds a solid platform of trust and strength whilst translating our behaviours into actions that protect Vivo Energy, and each and every one of us.

Breaching our Code of Conduct has serious consequences for Vivo Energy and its employees. For Vivo Energy this could include significant fines and damage to our reputation. For individuals this could lead to dismissal or imprisonment.

As Vivo Energy employees, it is our responsibility to understand and abide by the Code every day. If we do so, Vivo Energy's reputation will be enhanced, our business will perform better, and our professional lives will be even more fulfilling.

Please read our Code of Conduct and act accordingly as it is one of the most fundamental parts of our vision to become "Africa's most respected energy company".



Stan Mittelman
CEO
Vivo Energy

4. PEOPLE AND SAFETY

Vivo Energy aims to do no harm to people and to minimise our impact on the environment. You should treat others fairly and with respect. Vivo Energy is an inclusive company. Discrimination and harassment are unacceptable.

1

HEALTH, SAFETY, SECURITY & ENVIRONMENT (HSSE) AND SOCIAL PERFORMANCE (SP)

To have a HSSE & SP record we can be proud of, we are committed to the goal of doing no harm to people and minimising our impact on the environment, while developing energy resources, products and services consistent with these aims. We aim to earn the confidence of customers, shareholders and society, to be a good neighbour and to contribute to sustainable development.

These aims and others are included in the HSSE section on V-net. Every Vivo Energy company is required to have a systematic approach to HSSE & SP management designed to ensure compliance with the law and to achieve continuous performance improvement.

Each Vivo Energy company should set targets for HSSE & SP improvement and measure, appraise and report performance levels. Vivo Energy companies must also ensure contractors and joint ventures under Vivo Energy's operational control manage HSSE & SP in line with the Commitment and Policy.

To support the aims in the Commitment and Policy, the Vivo Energy HSSE & SP Control Framework is a single source for requirements for managing the impacts of our operations and projects on society and the environment.

Your responsibility

You should understand the Commitment and Policy on HSSE & SP. You should follow the Vivo Energy HSSE Life-Saving Rules.

2

SUSTAINABLE DEVELOPMENT

Sustainable development for Vivo Energy means helping to meet the world's growing energy needs in ways that are economically, environmentally and socially responsible. Vivo Energy commitment to sustainable development requires us to balance our short and long-term interests; and integrate economic, health, safety, security, environmental and social considerations into business decisions.

Sustainable development is a licence to operate imperative and Vivo Energy embraces sustainable development principles within all its activities to deliver sustainable outcomes. This requires us to engage regularly with, and take account of the views of our stakeholders in order to create new profitable opportunities and reduce our technical, non-technical and financial risks, while respecting the needs of our neighbours.

Your responsibility

You must comply with Vivo Energy health, safety, security, environment and social performance requirements. Each business must aim to create lasting social benefits; safeguard the health and safety of employees, contractors and neighbours; minimise disruptions to the community; lower



emissions; minimise impact on ecosystems and biodiversity; and use less energy, water and other resources.

3 EQUAL OPPORTUNITY

Vivo Energy will ensure that its employment-related decisions are based on relevant qualifications, merit, performance and other job-related factors. Vivo Energy will not tolerate unlawful discrimination relating to employment.

Your responsibility

Respect everyone you deal with and behave fairly towards them according to the Vivo Energy core values and the Vivo Energy General Business Principles. You should understand the value of diversity and never discriminate.

The principles

- You should base hiring, evaluation, promotion, training, development, discipline, compensation and termination decisions on qualifications, merit, performance and business considerations only.
- Do not discriminate according to race, colour, religion, age, gender, sexual orientation, marital status, disability, ethnic origin or nationality.
- Be aware of local legislation and cultural factors that may impact decisions.

Challenge yourself

- Are you being fair and respectful?
- Have you considered the other person's views?
- Are your personal feelings, prejudices or preferences influencing your decisions?
- Do you understand local practices and customs?

4 HARASSMENT

Vivo Energy will not tolerate harassment. Vivo Energy will not tolerate any action, conduct or behaviour which is humiliating, intimidating or hostile. You should be particularly sensitive to actions or behaviours that may be acceptable in one culture but not in another.

Your responsibility

Treat others with respect and avoid situations that may be perceived as inappropriate. Challenge someone if you find their behaviour hostile, intimidating or humiliating. Harassment can result in disciplinary action and may lead to dismissal.

The principles

- Do not physically or verbally intimidate or humiliate others.
- Never make inappropriate jokes or comments. If you are unsure whether something is inappropriate assume that it is.
- Never distribute or display offensive or derogatory material, including pictures.
- Don't be afraid to speak up and tell a person if you are upset by his or her actions or behaviour. Explain why and ask them to stop.

Challenge yourself

- Have you behaved appropriately?
- Have you behaved in an embarrassing or threatening manner?
- Have you made inappropriate jokes or comments?
- Have you distributed or displayed potentially offensive material?

5 HUMAN RIGHTS

Conducting our activities in a manner that respects human rights.

Vivo Energy's approach to respecting human rights consists of several core elements, including adherence to corporate policies, compliance with applicable laws and regulations, regular dialogue and engagement with our stakeholders and contributing, directly or indirectly, to the general wellbeing of the communities within which we work. In particular, we are committed to preventing any form of modern slavery, trafficking, exploitation or forced labour occurring within our organisation or that of any of our business partners.

Our commitments in this area are supported by the Vivo Energy Business Principles, this Code of Conduct and relevant Group policies in such diverse areas as:

- Social Performance;
- Human Resources; and
- Contracting and Procurement.

We seek business partners and suppliers that observe standards similar to ours.

All employees must understand the human rights issues where they work and follow Vivo Energy's commitments, standards and policies on this topic.

All employees should report any potential or suspected breach of human rights to the whistleblowing hotline.

Your responsibility

You should understand the human rights issues where you work and follow Vivo Energy's commitments, standards and policies.

5. FIGHTING CORRUPT PRACTICES

Vivo Energy does not tolerate bribery, insider trading, market abuse, fraud or money laundering. You must also avoid any real or potential conflict of interest (or the appearance of a conflict) and never offer or accept inappropriate gifts or hospitality.

Remember, even unsubstantiated claims of corruption can damage reputations and business.

1 BRIBERY AND CORRUPTION

Bribery occurs when you offer, pay, seek or accept a payment, gift or favour to influence a business outcome improperly.

Bribery and corruption – whether involving government officials, or commercial entities, including joint ventures – can be direct or indirect through third parties like agents and joint venture partners. Even turning a blind eye to your suspicions of bribery and corruption can result in liability for Vivo Energy and for you personally.

Your responsibility

You must not offer, pay, make, seek or accept a personal payment, gift or favour in return for favourable treatment or to gain any business advantage. You must follow the anti-bribery and corruption laws that we are subject to, both those of the countries we are operating in, and those which apply outside the country.

Dealing with Government Officials poses a greater bribery risk so you must follow the mandatory requirements in the Anti-Bribery and Corruption Manual and the Anti-Money-laundering Manual. You are liable to disciplinary action, dismissal, legal proceedings and possibly imprisonment if you are involved in bribery and corruption.

The principles

- Never offer, pay, make, seek or accept a personal payment, gift or favour in return for favourable treatment, to influence a business outcome or to gain any business advantage.
- Ensure people you work with understand bribery and corruption is unacceptable.
- Call the Vivo Energy Helpline if you suspect or know of corruption in Vivo Energy or in any party (company or individual) Vivo Energy does business with.

Challenge yourself

- Have you offered, given or received money, a gift or favour to influence a business decision?
- Would you care if the public knew what you had done?

- Are you intending to or have you given a donation which might be regarded as an improper payment?

2 DEALING WITH GOVERNMENT

The offering of gifts and hospitality (G&H) including travel-related expenses for government officials creates special concerns. Some countries have very strict limitations on the value and nature of gifts and entertainment their officials can accept. G&H that are acceptable between private business partners may be unacceptable between a business and an official. In addition, third-party behaviour can result in liability for you and Vivo Energy if you fail to conduct appropriate due diligence on third parties who deal with government officials on Vivo Energy's behalf, or if you disregard the results of such due diligence.

For further information, refer to the Ethics & Compliance section on V-net for the Vivo Energy Anti-Bribery and Corruption Manual and the Anti-Money-laundering Manual.

The principles

- You must have permission from Vivo Energy to offer G&H to government officials.
- The value of G&H must not exceed the prescribed limit for the type of payment. Check these limits in appendix A of this document.
- You must not offer G&H to the spouses, family members or guests of a government official.
- You must not pay for non-business travel and hospitality for any government official.
- You must comply with all applicable laws and with Vivo Energy's internal procedures regarding G&H to government officials.

3 POLITICAL ACTIVITIES AND PAYMENTS

Your political activity and payments risk being viewed as those of Vivo Energy and may impact our business or reputation.

Your responsibility

You must not contribute Vivo Energy funds or resources to political campaigns, political parties, political candidates or anyone associated with them. You must ensure your personal political activities are not represented to be those of Vivo Energy. Political activity and payments can cause a conflict of interest and can harm Vivo Energy business dealings and reputation. A failure to follow the requirements of this Code or any laws or regulations may result in disciplinary action, including termination of employment.

The principles

- Do not use a Vivo Energy account for political payments.
- Do not make charitable donations as a substitute for political payments.
- Do not allow Vivo Energy funds to be used via industry bodies or by other means to make party political contributions.
- Obtain, when necessary, Vivo Energy's permission before standing for public office.
- Comply with laws regulating political participation.

Challenge yourself

- Are you using your position to support politicians or parties?
- Are business decisions being made improperly to influence politics?
- Are you using Vivo Energy's account to fund politics?
- Are you using Vivo Energy resources for party political work?

4 GIFTS AND HOSPITALITY (G&H)

G&H must never influence your business decisions and must not place you or Vivo Energy under any obligation.

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.

The principles

- Vivo Energy discourages its employees from accepting G&H from business partners.
- Decline G&H if you would feel uncomfortable telling your line manager or supervisor, colleagues, family, friends or the public that you had accepted them.
- You and your family members must never, in connection with Vivo Energy business offer, give, seek or accept:
 - » illegal or inappropriate G&H;
 - » cash or cash equivalents;
 - » personal services;
 - » loans;
 - » events or meals where the business partner is absent; or
 - » G&H during periods when important business decisions are being made.
- Never offer, give, seek or accept G&H that exceed prescribed value limits, unless line manager approval has been obtained.
- Make Vivo Energy policy on G&H known to your business partners.
- Discuss corporate hospitality or sponsorship with your manager.
- Comply with laws and regulations.
- Understand that local customs cannot be followed if they conflict with Vivo Energy policies.
- You must register:
 - » all G&H given to government officials, except those of nominal value like a cup of coffee;
 - » any G&H that could be perceived as creating a conflict of interest; and
 - » all G&H given or received from third parties that exceed allowed value limits.
 - » all declined G&H that exceed allowed value limits; and

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

Challenge yourself

- Did receipt of the G&H make you feel you were under an obligation?

- Is the gift being given as an exceptional reward or incentive for a transaction?
- Is the G&H inappropriate or illegal?
- Is the timing of the G&H sensitive (e.g. during negotiations)?

5

FUNDING SOCIAL INVESTMENTS, DONATIONS AND SPONSORSHIPS (D&S)

Funding of Social Investments, Donations and Sponsorships must never improperly influence a business outcome and must always be contributed to a legitimate organisation and not to any individual.

The principle

Social Investments, Donations and Sponsorships carry certain bribery and corruption risks, particularly in relation to the interaction with external parties. These risks must be identified through Due Diligence and mitigated when considering requests from third parties to ensure funding never improperly influences a business outcome.

Your responsibility

All Funding of Social Investments, Donations and Sponsorships must be declared, regardless of value, in the online e-registers.

Before offering or committing any funds consult the Sponsorship and Donation policy and the E&C team.

6

CONFLICTS OF INTEREST (COI)

All Vivo Energy employees as well as contractors are required to make an annual statement to confirm that they will adhere to the Vivo Energy General Business Principles and Code of Conduct and to declare any relationships they have that might create a conflict of interest (CoI) with their role at Vivo Energy.

You face a COI when your personal relationships, participation in external activities or interest in another venture influence or could be perceived to influence your decisions.

Your responsibility as an employee

You must avoid situations which can be perceived as creating a conflict of interest. Decisions you make in your capacity as a representative of Vivo Energy must not be influenced by personal and private considerations.

A CoI can influence your decision-making, or be perceived to do so, and jeopardise your reputation and that of Vivo Energy. Failure to follow the requirements of this Code or any laws or regulations can result in disciplinary action, including termination of employment.

The principles

- Declare to your line manager or supervisor any matter that could influence or be perceived to influence your decisions or actions at Vivo Energy.
- Give your line manager all the relevant facts in your online declaration if you believe there is an actual or potential CoI.
- Follow up with line manager to ensure that the steps to manage the CoI are properly monitored and documented.
- Withdraw from any decision-making that creates, or could be perceived to create, a CoI.
- Be impartial, professional and competitive in your dealings with contractors and suppliers.
- You can be active in your own time in the community, government, educational and other non-profit organisations if you comply with relevant laws, regulations and Vivo Energy policies.
- You can acquire interests in other businesses and perform external professional activities in your own time as long as this does not constitute an actual or potential CoI. If in doubt, please consult your line manager or the Ethics & Compliance Office.
- If any COI arise during the year it must be recorded on the COI update register.
- Pre-approvals must be sought from the Ethics & Compliance office before you accept or engage in any of the following:

- » Any executive or non-executive role in a company other than that of Vivo Energy and any of its subsidiaries.
- » Outside employment or selling of hours other than to that of Vivo Energy and any of its subsidiaries.
- » Obtaining financial interest in any company or business that has or may have commercial or corporate relations with any of Vivo Energy's companies.

explained to the employee that this is strictly prohibited?

- Is the employee hiring, managing, reviewing or appraising a relative or friend?
- Have you documented your discussions with the applicable employee, setting out the guidelines and restrictions of how a certain conflict should be managed and monitored?

Challenge yourself

- Are you hiring, managing, reviewing or appraising a relative or friend?
- Are you using your position for personal gain?
- Have you personally gained from confidential information?
- Are your personal relationships influencing business decisions?

Your responsibilities as line manager

In your capacity as line manager it is your responsibility to review the conflict of interest submissions of your direct reports. When doing so, you need to critically consider whether the conflicts / potential conflicts can be accepted and whether measures need to be implemented to mitigate any perceived risks of undue gain / influence.

Keep the following questions in mind:

- Is the employee using his / her position for personal gain?
- Are the employee's personal relationships influencing the business decisions he / she makes?
- Should the employee be excluded / excused from certain meetings / making certain decisions?
- Should access rights to certain information be restricted taking into account the conflict declared?
- How much time will the employee spent on the activities / interests declared? Will this interfere with his / her responsibilities at Vivo Energy?
- Will the employee be tempted to use the company's resources to support his / her external interest? Have you

8 MONEY LAUNDERING

Money laundering occurs when the criminal origin or nature of money or assets is hidden in legitimate business dealings or when legitimate funds are used to support criminal activities, including financing of terrorism. Offences covered by anti-money laundering legislation include: prejudicing or obstructing an investigation and failing to report suspicious activity.

Your responsibility

Vivo Energy could be exploited by criminals to launder money or fund criminal activities. You must conduct appropriate counterparty due diligence to understand the business & background of our prospective business partners and to determine the origin and destination of money and property. You must report suspicious incidents or transactions of money laundering. Failure to do so can lead to fines, dismissal or imprisonment.

For further guidance, please visit the Ethics & Compliance section on V-net for the Vivo Energy Anti-Money-laundering Manual.

The principles

- Never deal with suspected criminals or the proceeds of crime.
- Report any suspicious transactions or individuals to Vivo Energy.
- Do not acquire, use or hold monetary proceeds or property acquired with the proceeds of crime.
- Do not hide the origin or nature of criminal assets.
- Do not facilitate the acquiring, ownership or control of criminal property.

- Do not tip off the subject of an investigation.
- Do not falsify, conceal, destroy or dispose of relevant documents.

Challenge yourself

- Can you verify transaction details?
- Is someone offering commercial terms outside expected market conditions?
- Are the settlement methods unusual or are unconnected parties involved?
- Are all due diligence checks in order?

6. NATIONAL AND INTERNATIONAL TRADE

Vivo Energy is committed to free, fair and ethical enterprise. You must follow all applicable trade laws and ensure Vivo Energy core values are applied in all your dealings. A failure to comply with these laws and regulations can severely damage our business and expose us to criminal charges. You could face dismissal, fines and imprisonment.

1 ANTITRUST (COMPETITION) LAW

Antitrust law protects free enterprise and prohibits behaviour that limits trade or that restricts fair competition. These laws apply to every level of business. They combat illegal practices like price-fixing, market-sharing, bid-rigging conspiracies or behaviours that aim to achieve or maintain monopoly. Vivo Energy does not tolerate violation of antitrust laws.

Your responsibility

You must not agree with competitors of Vivo Energy to fix price or any elements of price (such as discounts, rebates or surcharges). You must not agree with others not to compete in particular markets or for particular customers or accounts. You must not rig bids or tenders, and you must not agree with others to boycott any customers or suppliers except in connection with internationally imposed sanctions. Agreements with competitors to reduce or stabilise production, capacity or output are forbidden. You must also not agree with independent dealers or resellers to fix a minimum resale price of a product. Anti-competitive behaviour will damage Vivo Energy business and reputation for fairness and honesty. Anti-competitive practices are unacceptable. They are illegal in most

countries and can lead to heavy fines and imprisonment.

For further information, please visit the Ethics & Compliance section on V-net for the Vivo Energy Antitrust Manual.

The principles

- Do not agree, even informally, with competitors on pricing, production, customers or markets without a lawful reason. Always get legal advice on whether a practice is lawful.
- Decisions on Vivo Energy pricing, production, customers and markets must be made by Vivo Energy alone.
- Do not discuss with competitors:
 - which suppliers, customers or contractors Vivo Energy deals with and will deal with; or
 - which markets Vivo Energy intends to sell into or on what terms Vivo Energy will deal.
- Leave industry meetings if competitively sensitive issues arise and ensure your departure is noticed. Report the matter to the Chief Legal and Compliance Officer.
 - Call the Vivo Energy Helpline if you know of any potentially anti-competitive practices or if you are

uncertain whether practices are legal or not.

Challenge yourself

- Was competitively sensitive information discussed at an industry meeting (either directly or indirectly)?
- Have I tried to set the resale price of my dealers or distributors?
- Are our suppliers or customers involved in any anti-competitive behaviour?
- Do I know what my line reports are doing?
- Have I obtained the relevant legal advice?

2 EXPORT CONTROLS AND SANCTIONS

Export Controls and Sanctions laws give countries legal control over the sale, shipment, electronic transfer or disclosure of information, software, goods and services across national borders. Exports include transfers electronically, through discussions or visual inspections, and not only through traditional shipping methods.

Your responsibility

Think carefully about the potential impact of export control laws and sanctions before transferring goods, technology, software or services across national borders. Remember that controls and sanctions (or embargoes) can be imposed against countries, entities, individuals and goods. You must know which of these controls or sanctions may result in restrictions or prohibitions on the way you conduct business. If you do not comply with the relevant controls and sanctions, Vivo Energy could face criminal charges, fines and loss of export privileges; and you could face dismissal, fines or imprisonment.

3 IMPORT CONTROLS AND SANCTIONS

Import Controls and Sanctions laws give countries legal control over the purchase, shipment, electronic transfer or disclosure of information, software, goods and services into

their jurisdiction. Import controls apply to Vivo Energy as a company and also to you personally.

Your responsibility

You must meet import requirements when bringing goods or services into a country, ensuring duties, levies and taxes are paid.

You must not bring restricted goods into a country without declaring them. You must seek legal advice if you have doubts about an import. You must not import prohibited goods. Failure to observe import control laws and sanctions can cause operational delays and damage business. Vivo Energy could also face legal consequences, including fines and loss of privileges. You could face dismissal, fines or imprisonment.

The principles

- Make sure you have proper authorisation before exporting or importing goods, technology, software or services across national borders.
- Know your customers and suppliers and how they will use the goods, technology, software or services that you supply to them.
- Seek legal advice before doing business with a country or individual if sanctions apply.
- Do not import from a country to which sanctions apply, into a country which applied those sanctions.
- Keep up to date with changing rules.
- Get legal advice if you have doubts about export and import controls or sanctions.

Challenge yourself

- Do you understand the applicable export and import controls?
- Do you know which countries, entities, individuals and goods have had sanctions applied?
- Have the relevant duties, levies and taxes been paid?
- Have you obtained all required permits?
- Are you importing or exporting restricted or prohibited good.

7. SAFEGUARDING INFORMATION AND ASSETS

Intellectual, physical and financial corporate assets are valuable and must be preserved, protected and managed properly. Personal Data and Intellectual Property (IP) must be safeguarded. Information Technology (IT) and communications facilities should be used responsibly. Records must be accurate and appropriately retained. Fraud, theft, abuse or misuse of Vivo Energy assets is unacceptable and could have serious implications and recourse. Vivo Energy is subject to a number of international laws and regulations with which we must comply, and if we fail to do so, both Vivo Energy and the employees involved could be subject to both criminal and civil sanctions.

1 PROTECTION OF ASSETS

Corporate assets can be financial, physical or intangible and include buildings, equipment, funds, software, know-how, data, patents and other IP.

Your responsibility

You must protect Vivo Energy assets against waste, loss, damage, misuse, theft, misappropriation or infringement. You must use Vivo Energy assets appropriately and responsibly. You must respect the physical and intangible assets of others. A failure to follow the requirements of this Code or any laws or regulations may result in disciplinary action, including termination of employment.

1.1 PROTECTION OF ASSETS

IP assets and rights, including patents, trademarks, know-how and trade secrets relating to Vivo Energy's operations or technologies are among Vivo Energy's most valuable assets. IP is a key strategic tool for achieving business objectives and must be managed with proper care.

The principles

Vivo Energy companies must properly protect Group IP.

Third party IP rights must not be knowingly infringed.

Vivo Energy Legal must be consulted in a timely manner about transactions and IP-related agreements, which should be made

with proper authority and implemented as agreed.

IP disputes and related communications must be handled through Vivo Energy Legal.

1.2 PERSONAL USE OF IT

IT and communication facilities include personal computers, mobile and desk phones and smartphones. A limited use of Vivo Energy IT and communication facilities for personal use is currently generally acceptable but could be reviewed. The use, including your personal use, of Vivo Energy IT and communication facilities is logged and monitored.

Your responsibility

You should apply high ethical standards, comply with applicable laws and regulations, and ensure you meet Vivo Energy security requirements when using Vivo Energy IT and communication facilities. Your personal use of Vivo Energy's IT and communication facilities should not incur more than a nominal cost or negatively affect productivity. Improper use of these facilities could be illegal or a transgression of the Code and could damage Vivo Energy both on a financial and reputational level.

Vivo Energy may report illegal use to the proper authorities.

The principles

- Ensure your personal use of Vivo Energy IT and communication facilities is occasional and brief. The systems

- are closely monitored and abuse will be flagged for follow-up
- Personal use includes online personal banking, social media for non-work related communications, browsing of sites of personal interest and download of information of personal interest.
- Downloading or streaming of non-work related video content is strictly prohibited.
- Do not use the Vivo Energy network or data storage space on the network for entertainment purposes or to store your personal data.
- Remain in control of the IT and communication facilities you are responsible for if others use them. Do not delegate these responsibilities unofficially by personal agreements (e.g. by giving other people your personal passwords).
- Do not upload, download, send or view pornography or other indecent or objectionable material or material that is illegal or which could cause offence, anxiety, inconvenience or annoyance to your colleagues.
- Include the Vivo Energy name or brand in your business communications but remove it from personal emails.
- Use Vivo Energy security measures and do not attempt to bypass them in any way.
- Ensure you comply with the Communications requirements as laid out in this Code.
- Get authorisation before installing software or connecting hardware.
- Do not use Vivo Energy IT or communication facilities for unlawful or immoral activities or purposes (including the violation of IP rights or the commission of cybercrime), online gambling or to conduct your own business activities.

Challenge yourself

- Can you explain and justify your personal use?
- Have you uploaded, downloaded or transmitted objectionable material?
- Have you removed the Vivo Energy footer from personal emails?

- Did you receive approval to install software?

2

DATA PRIVACY AND PROTECTION (DP)

Data Privacy laws and policies safeguard private information about individuals. This information includes identity and contact details, employment and financial information, age and nationality. Information on race or ethnic origin, religion or philosophical beliefs and health or sexual orientation. Trade union membership is also deemed sensitive personal data and subject to stricter controls. Vivo Energy respects the basic right to privacy of individuals – including employees, customers and suppliers.

Refer to the “Vivo Energy Information Risk Management Policy” and the “Vivo Energy Data Classification Policy” for more detail.

Your responsibility

You must respect a person’s right to privacy and follow applicable laws when gathering, using or sharing their data. Personal information about individuals must be protected from misappropriation. Failure to keep personal data confidential and secure could possibly lead to dismissal and or legal prosecution.

If you are uncertain on any of these points highlighted, please refer to the policies on V-net, which provides more detail regarding acceptable usage of company IT assets. If you have any questions regarding policy specifics feel free to contact the Ethics & Compliance Office.

The principles

- Use appropriate physical and IT safeguards.
- Call the Vivo Energy Helpline if you know of, or suspect, any security lapses or breaches.
- Do not gather, handle, store, use or share personal data unless that information is essential for business purposes and you are allowed to do so by law. Inform individuals as to why you are collecting their personal information and have them acknowledge it on record.

- Observe legal restrictions on the transfer of personal data. Contact Legal in case of doubt or refer to the Ethics & Compliance section on V-net.
- Do not keep personal information longer than necessary, and then securely delete, destroy it or make it anonymous. You must be able to prove the steps that you have taken in ensuring the safeguarding of personal data.
- Ignorance of the Law and the “Vivo Energy Data Privacy Policy” is no excuse in the event of a breach.

Challenge yourself

- Do you understand the DP laws?
- Are you allowed to collect, use, and store or share this information?
- Have you told the individual why you are collecting this information?
- Did you obtain the individual’s permission to use or share this information?
- Did you destroy the relevant personal information in a secure manner on a per-case basis?
- Can you prove the steps taken to destroy the personal information?

3 RECORDS MANAGEMENT

Records are valuable company assets and must be securely managed. Vivo Energy must be able to retrieve Records quickly and reliably. When a Record’s retention period is over, appropriate disposal is required. A Record contains information that is evidence of a business activity or required for legal, tax, regulatory and accounting purposes or is important to Vivo Energy business or corporate historical data. It is the content which determines a Record not its format. Records include, without limitation, any contracts, product specifications, audit reports, financial information, corporate policies, guidelines and procedures and minutes of meetings. Refer to

the “Vivo Energy Data Classification Policy” for more details.

Your responsibility

You must understand which information is a Record which must be properly managed and disposed of when no longer of value. Failure to manage Records effectively can lead to significant business risks that may have negative financial, competitive, reputational, compliance & regulatory consequences and can breach legal, accounting, tax and regulatory requirements. Individuals must manage their Records in accordance with the Vivo Energy Records Management and Archiving Policy. If you are working with third parties, you must ensure you are authorised to share information with them before doing so. Always ensure that a relevant NDA (Non-Disclosure Agreement) is signed by the third party before commencing the business relationship. A copy of the NDA template can be obtained from Legal.

The principles

- All individuals must manage their Records in accordance with the Vivo Energy Records Management and Archiving Policy.
- A copy of the Vivo Energy Records Management and Archiving Policy can be located on V-Net or from the Ethics and Compliance Office.
- Challenge yourself
- Do you know what your Records are and how to identify, classify and store them?
- Are you aware of the “Vivo Energy Data Retention Policy”?
- Are your Records protected from unauthorised access, duplication or interference?
- Have you preserved all information relevant to actual or anticipated litigation, regulatory investigation or tax audit?
- Have you officially transferred custody of the relevant records when changing roles

8. COMMUNICATIONS

Your communications are a reflection of Vivo Energy. Ensure your communications are necessary, relevant, professional and appropriate. Ensure you adhere to all rules and follow all guidelines as set out in the “Vivo Energy Media and Social Media Policy”. Failure to safeguard information can damage Vivo Energy’s reputation and its ability to conduct business effectively.

Inappropriate, inaccurate or careless communication can create serious reputational and compliance risks for you and Vivo Energy.

1 BUSINESS COMMUNICATIONS

The “Vivo Energy Media and Social Media Policy” sets the principles and the rules for all communication by Vivo Energy staff within Vivo Energy or with third parties. The Policy applies to every kind of correspondence including, without limitation, mail, electronic documents, instant messages, websites, social media tools, paper documents, facsimile, voice and voice mail recordings.

Your responsibility

You must familiarise yourself with the Vivo Energy Media and Social Media policy. Failure to do so may damage the reputation of Vivo Energy.

Failure to comply with this policy may result in disciplinary or legal action.

The principles

- In your business communications:
 - » do not mislead;
 - » do not be ambiguous
 - » do not write speculative opinions;
 - » do not exaggerate;
 - » do not engage in “casual conversation” on sensitive or confidential matters; and
 - » do not joke about serious matters.
- State which Vivo Energy company the communication is coming from.
- Follow all relevant standards and guidelines as set out in the applicable policy. In particular:
 - » follow the Vivo Energy Electronic Communications

Policy when publicly disclosing information;

- » liaise with the Communications department before publicly disclosing information;
- » classify communications according to the Vivo Energy Data Classification Policy;
- » remember that communications with a competitor can violate antitrust laws;
- » if you are handling personal data ensure you comply with applicable laws and policy;
- » ensure that exports or imports of information to or from other countries are not prohibited and that appropriate licences have been obtained where required by law.

Challenge yourself

- Are you familiar with the “Vivo Energy Media and Social Media policy”?
- Would you be comfortable if this communication appeared in the public domain?
- Would you be comfortable if this communication was used as evidence in legal proceedings?
- Is this communication lawful?
- Do you need to make this communication?
- What is the best way to communicate?

External communications and social media make an essential contribution to building Vivo Energy's reputation. Effective media relations allow Vivo Energy to reach a large audience and inform them of the company activities.

Your responsibility

- Employees / contractors must not engage in casual conversation on sensitive or confidential matters, or send communications containing material that is racist, sexist, offensive, defamatory, fraudulent or otherwise inappropriate.
 - Employees / contractors must not disclose confidential business information (e.g. financial, operational, legal information, or any information that pertains to clients and customers) unless authorised to do so.
 - Employees / contractors must not use personal social media accounts for business purposes. Personal social media may be used to comment on industry-related topics however employees / contractors must clearly mark their own online posts as "personal views that are purely their own, and not necessarily the views of Vivo Energy."
 - Employees / contractors must not engage with media on behalf of Vivo Energy, but instead should redirect media enquiries to the OU Communications Manager (at OU level) or Head of Communications (at central level), for response.
 - Authorised spokespeople should not communicate with media before agreement from the Communications Manager / Head of Communications.
 - Authorised spokespeople should have received appropriate media training before engaging with media, and be fully comfortable with the nature of the enquiry.
 - It is important that all reactive media enquiries are carefully managed and that responses are made in a consistent manner.
 - The guiding rule for all media activity is "no surprises" and all communications should support the Vivo Energy corporate narrative.
- If an approved spokesperson is to conduct a media interview a briefing document should be prepared by the Communications Manager / Head of Communications and reviewed by the spokesperson in advance.
 - All press releases or holding statements should be prepared by the OU Communications Manager and receive approval from the Head of Communications before being issued.
 - Vivo Energy uses three main social media channels – Facebook, LinkedIn and Twitter – that are managed by the OU Communications Manager (for local sites) and Group Communications (for group sites).
 - In the event of an incident / crisis the Vivo Energy Crisis Management Plan should be followed.
 - Before media engagement takes place potential likely questions should be anticipated and answers prepared.

The principles

Any employee who engages in social media activity for Vivo Energy must know and apply the following guidelines. These guidelines particularly apply to community managers of Vivo Energy's social media channels:

DO's

- Remember to notify Group Corporate Communications before you create accounts for Vivo Energy.
- Include the name of the brand and location in social media display names (e.g. Vivo Energy Maroc).
- Ensure all accounts are set up with "admin" type logins. Make sure you have recorded these log in details and that the rest of your team know where they are stored.
- Remember to follow brand guidelines when using social media.
- Use 'human', conversational language rather than corporate jargon.
- Follow other countries' Vivo Energy accounts on social media, and share their content.
- Use social networks for attracting talent.

- Feel free to post updates on social media about Vivo Energy's latest news and industry expertise.
- Remember to double check which account you are updating when uploading via remote devices.
- Include the following disclaimer when commenting on any aspect of Vivo Energy's business from your personal social network accounts: "The views expressed here are my personal views and not necessarily the views of my employer."

DON'Ts

- Engage in any online behaviour that could potentially damage the Vivo Energy brand
- Disclose information that is confidential, proprietary or commercially sensitive to Vivo Energy
- Reference colleagues, job candidates or suppliers without seeking prior approval
- Speak for the organisation on issues over which you do not have sufficient expertise or authority
- Make discriminatory remarks, threats of violence, or engage in any conduct that would be unacceptable in the workplace
- Fight negative comments about Vivo Energy with negative responses.
- Shorten brand names (e.g. VE, Vivo).
- Misrepresent the organisation, your colleagues, job candidates, clients or suppliers.
- Use logos, images or colours that do not meet the brand guidelines.

Further information on the Vivo Energy Media / Social Media Policy, along with more social media dos and don'ts can be found at the policies section on V-net.

3 PUBLIC DISCLOSURE

Any written or oral communication made publicly on behalf of Vivo Energy is a public disclosure.

Your responsibility

You must not make public disclosures about Vivo Energy's business activities if you are not

authorised to do so. You must protect confidential information. If you are authorised to disclose information you must ensure it is unambiguous, true, accurate, consistent and not misleading. Ensure that Vivo Energy's financial records fairly reflect transactions that you are responsible for and Vivo Energy's financial position.

You must not make public disclosures or engage with the media or investment community without clearance from Vivo Energy Communications professionals.

Misleading the public can be a regulatory offence. Inaccurate and delayed information disclosure can damage Vivo Energy's reputation. Vivo Energy and the individuals involved could face investigation, prosecution, suspension and fines.

The principles

- Ensure public disclosures are unambiguous, true, accurate, consistent and not misleading.
- Protect confidential information in accordance with the Vivo Energy Data Privacy Policy.
- Comply with the Vivo Energy Media and Social Media Policy and the Vivo Energy Electronic Communications Policy and only make public disclosures if you are authorised to do so.
- Report the loss or theft of Vivo Energy information or IT assets to your line manager or supervisor as soon as possible.
- Follow applicable policy and procedures if you believe you hold price-sensitive information about Vivo Energy.
- Comply with all applicable policies, laws and regulations at all times.
- Do not engage with the media or the investor community unless the required clearances have been obtained.

Challenge yourself

- Are you familiar with all applicable policies, laws and regulations regarding public disclosure of information?
- Is your information true and accurate?



- Have you obtained clearance from Communications?
- Do you possess price-sensitive information?
- Have you told the whole story?

9. 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.

1 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, professionalism, and pride in what we do.

2 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.

3 RESPONSIBILITIES

We recognise 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 free from the risk of

forced labour or exploitation. 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 recognise 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.

4 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 behaviour 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 fulfil 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. 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, organisations 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 neighbours 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 recognise that regular dialogue and engagement with our stakeholders is essential. We are committed to reporting of our performance by providing full disclosure of 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.

10. GLOSSARY

Charitable donations	Anything of value given to a charitable organisation or sponsorship that is given without charge to a charity or any community development expenditure.
Code of Conduct	Values, ethics, rules and principles describing the behaviour expected of you and what you can expect of Vivo Energy.
Competitor	A company in the same industry offering a similar product or service.
Compliance Officer	Monitors compliance activities including incidents and business risk.
Confidential business information	Information and data that must be protected and not shared with any unauthorised party.
Customers	Clients and buyers of products and services offered by Vivo Energy.
Government official	Employee of any government (local or national); or of a company wholly or partially controlled by government; or an official of a political party; or employee of an international organisation; or immediate family member of any of these.
Inappropriate gift	Gift offered or received of an unacceptable value, inappropriate nature, or in unacceptable circumstances.
Intellectual property	Includes patent rights; utility models; trademarks and service marks; domain names; copyright (including copyright of software); design rights; database extraction rights; rights in know-how or other confidential information; and rights under IP related agreements.
Items of nominal value	Items of insignificant value e.g. conference pen; cup of coffee.
Joint venture	A legal entity formed between Vivo Energy and other parties to undertake a business activity together.
Partners	A supplier, customer, agent, or any party involved in any joint venture with Vivo Energy.
Restrictions or prohibitions	Limits that govern what can and cannot be done e.g. kinds of goods allowed into a country.

Social performance	How Vivo Energy manages the impact of its business on the communities and societies in which it operates.
Vivo Energy General Business Principles	Govern how Vivo Energy companies conduct their affairs.
Vivo Energy Helpline	Available to all employees for reporting or receiving advice on legal and ethical non-compliance incidents, dilemmas and concerns.
Vivo Energy values	Honesty, integrity and respect for people.
Stakeholder	Person, group, organisation, or system that has a vested interest in Vivo Energy business.
Supervisor	The person who has the authority to give you instructions and/or orders.
Value limits	Acceptable value of gift, hospitality or entertainment that can be receive or offered.

CONTACT DETAILS

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