

Responsible Sourcing Policy and Supplier Code of Conduct

OUR OBJECTIVE

The objective of the Viva Energy group of companies (Viva Energy) is to conduct our business efficiently, responsibly and profitably, to further the interests of shareholders and Australian economic, environmental and social goals.

In pursuit of this objective, the Viva Energy Business Principles and Code of Conduct are fundamental to how we conduct our business, and living by them is crucial to our success. They reflect our core values of integrity, responsibility, curiosity, commitment and respect, and set out the key principles and behaviours that apply to the conduct and operations of all Viva Energy companies.

In living by these values and principles, Viva Energy seeks to engage with contractors, suppliers and service providers (together "Suppliers") who share similar values as reflected in the Viva Energy Business Principles and Code of Conduct.

TO MEET OUR OBJECTIVE WE WILL

Seek mutually beneficial relationships with our Suppliers and promote the conduct of our business as responsible corporate members of society by:

1. Acting with honesty, integrity and fairness in all aspects of our business;
2. Building a culture which places the safety and wellness of people, and care for the environment and our communities, as the highest priority;
3. Maintaining a psychological safe workplace where harassment, bullying or prejudice is not tolerated;
4. Acting in a sustainable way with regard to the interests of the communities in which we operate; and
5. Committing to a high standard of product safety and quality and seeking to minimise any potential ethical or environmental impacts from our operations or our products.

This Responsible Sourcing Policy and Supplier Code of Conduct ("Code") confirms the commitments of Viva Energy across these key areas and sets out our expectations of Suppliers with whom we do business. We seek to engage with Suppliers who demonstrate a similar commitment and can support Viva Energy in being recognised as a leading and respected company within Australia. This Code applies to all Suppliers (and their personnel) who provide any goods or services to any company in the Viva Energy group of companies.

Business Integrity

Viva Energy insists on honesty, integrity and fairness in all aspects of our business and complies with all applicable laws and regulations in the regions in which we operate. It expects the same in our relationships with all those with whom we do business, including Suppliers.

It is the responsibility of our Suppliers to:

- Ensure that they comply with all relevant laws and regulations relating to competition law, trade controls, sanctions, money laundering, insider trading, bribery and corruption and modern slavery;
- Avoid any real or potential conflict of interest or the appearance of a conflict, and not offer or accept inappropriate gifts or hospitality;
- Respect the physical and intangible assets of Viva Energy against waste, loss, damage, misuse, theft, misappropriation or infringement; and
- Not make disclosures about Viva Energy's business activities if not authorised to do so including on personal communication channels such as social media platforms.

Health, Safety, Security and Environment

Safety is fundamental to Viva Energy, and operating safely and responsibly is at the heart of everything we do. We believe every incident is preventable and are committed to pursuing the goal of no harm to people and protecting the environment. We call this 'Goal Zero'.

Safety is everyone's responsibility. Through training and leadership, we make sure all our people know how important it is, what's expected of them, and how to recognise and manage situations that could pose a threat.

We recognise that caring for the health and wellbeing of our people can lead to healthier and happier employees, and that safeguarding employee health and wellbeing is an important part of our company's culture and identity.

We place a high priority on protecting the environments where we operate. We are committed to continual improvement of our environmental performance, and to minimising any potential environmental impacts arising from our operations or our products.

Viva Energy has a published Health, Safety, Security and Environment Policy which sets out our expectations and requirements for managing the impacts of our operations and projects on team members, contractors, visitors, customers, communities and the environment.

Suppliers conducting work for Viva Energy are required to comply with all site-specific safety requirements, acknowledge and comply with Viva Energy Life Savers, and meet Viva Energy's pre-qualification requirements.

It is the responsibility of our Suppliers to:

- Ensure that they comply with all relevant laws and regulations relating to workplace health and safety and the environment, including obtaining all necessary permits and licences;
- Establish and maintain a healthy and safe workplace for all workers, which includes taking reasonable steps to:
 - Identify workplace hazards;
 - Eliminate or minimise the risk of workplace injury, illness and disease;
 - Implement safe systems of work; and
 - Provide appropriate training for all people involved in their business;
- Intervene if faced with an unsafe situation, and report all known or observed hazards;
- Maintain health, safety, security and environment management reporting systems and processes; and
- Take active steps to reduce the environmental impact of their operations, products and services by maximising the efficient use of natural resources, energy, water and raw materials and minimising pollution (including greenhouse gases) and waste.



Respect for People

We believe in creating a respectful and inclusive workplace, where people can thrive and develop to their full potential in an environment that helps them to feel safe, confident and proud. We do not tolerate harassment, bullying or discrimination.

We value inclusion and diversity and the benefits they bring to Viva Energy in achieving our objectives, enhancing our reputation, and attracting, retaining and motivating team members from the widest possible pool of talent. We believe that genuine diversity of skills, backgrounds and experiences drives strategic advantage, creates opportunities for innovation and contributes to the achievement of our corporate objectives.

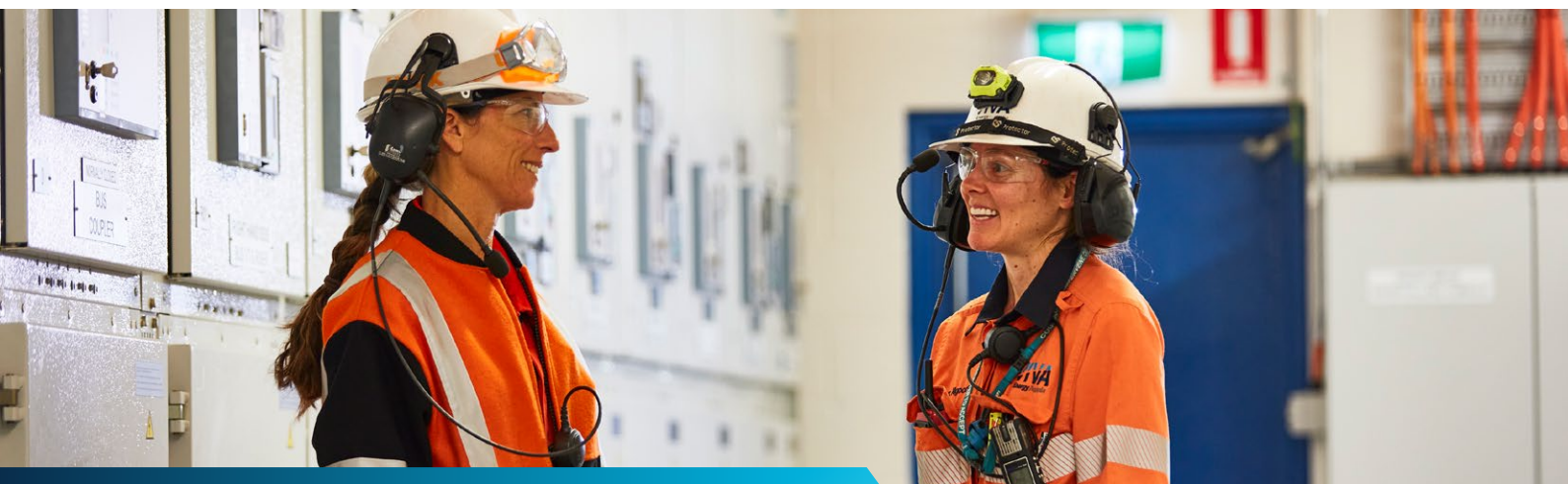
We are committed to ensuring a supportive, harassment-free and inclusive workplace, at all levels of the organisation. It is unlawful and unacceptable in Viva Energy to treat a person or group of people less favourably than another person or group because of their race, colour, national or ethnic origin; sex, pregnancy or marital status; breastfeeding; age; disability; religion; sexual orientation; gender identity or intersex status; trade union activity; or any other characteristic specified under anti-discrimination or human rights legislation.

Viva Energy has a published Human Rights Policy, which sets out our approach to human rights and is supported by the human rights commitments in our Business Principles and Code of Conduct. The Policy is based on the UN Guiding Principles on Business and Human Rights and applies to all internationally recognised human rights expressed in the International Bill of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

We also have a Prevention of Sexual Harassment in the Workplace Policy which reflects our commitment to providing a safe, inclusive and respectful working environment that is free from all forms of sexual harassment.

It is the responsibility of our Suppliers to:

- Ensure that they comply with all relevant laws and regulations relating to labour and human rights, including modern slavery;
- Respect the human rights of employees and provide them with safe working conditions and fair terms and conditions of employment;
- Demonstrate that they understand the value of a diverse and inclusive workplace, treat all persons with respect and not tolerate unlawful discrimination relating to employment or otherwise, or bullying or harassment (including sexual harassment);
- Comply with their positive duty to take proactive and meaningful action to prevent workplace sexual harassment, sex discrimination, sex-based harassment, conduct that amounts to subjecting a person to a hostile workplace environment on the ground of sex and victimisation from occurring in the workplace. This includes ensuring all employees who have dealings with Viva Energy understand our expectations as set out in our Business Principles and Code of Conduct and are provided with education on what constitutes inappropriate behaviour in the workplace.
- Have in place procedures to identify, investigate and take action in relation to any occurrence of harassment (including sexual harassment), bullying, discrimination and modern slavery, including human trafficking, slavery, forced labour or child labour;
- Comply with Workplace Gender Equality Agency certificate of compliance requirements (if applicable); and
- Respect the basic right of individuals to privacy, including by adhering to all applicable privacy law requirements regarding the collection, storage, processing, transmission and use of personal information.



Community and First Nations

At Viva Energy we are committed to having a positive impact in the communities we live and work, across the country. We support local jobs and economies, engage meaningfully with our neighbours and supporting the broader community through targeted community programs.

Our vision for reconciliation is a nation where Aboriginal and Torres Strait Islander peoples have equal and equitable opportunities and that our business visibly reflects this aspiration and is enriched by First Nations cultural diversity.

Our Reconciliation Action Plan celebrates First Nations cultures, promotes reconciliation, builds, respects and raises cultural awareness. We acknowledge that our business' strengths allow us to play a significant role in helping to: reduce substance misuse in regional and remote areas through the manufacture and supply of Low Aromatic Fuel to Northern Australia. It also allows us to support First Nations employment, particularly within our expanded Convenience and Mobility business and presents an opportunity to build and strengthen First Nations relationships at major sites where we operate.

We also promote the procurement of goods and services from First Nations businesses, and to support this vision, Viva Energy:

- Encourages First Nations procurement in our Procurement Policy and sourcing processes;
- Seeks to engage businesses that promote First Nations employment;
- Seeks to engage First Nations businesses where possible; and
- Encourages relevant Viva Energy employees to complete Supply Nation training.

It is the responsibility of our Suppliers to:

- Demonstrate a willingness to have a positive social impact in the communities in which they operate through regular stakeholder engagement, and by mitigating any negative impacts of their operations; and
- Demonstrate a willingness to develop and maintain beneficial relationships with First Nations peoples, communities and businesses.

Responsible Sourcing

Product Safety and Quality

In partnership with Suppliers, Viva Energy endeavours to procure products and its raw materials from ethical, and where reasonable, certified sources. This can include but not be limited to, animal products from known certified welfare sources, and ingredient or commodities from known industry certification programs. Where there is no affiliated certification program, Viva Energy may request traceability and supporting evidence to substantiate the source of the product and/or raw material inclusive of environmental impact and related safety protocols.

For more information refer to our Quality and Food Safety Standards Supplier Guide

Biodiversity

We recognise that maintaining biodiversity is an integral part of conserving the global environment and is fundamental to human survival. We recognise the intrinsic value of biodiversity and take measures to protect it in all of the areas in which we operate.

For more information refer to Our Biodiversity Approach.

Greenhouse Emissions and Circular Economy

Viva Energy recognises the complex global challenges posed by climate change. We support the objectives of the Paris Agreement, Australia's commitment to it, and the policies and actions critical to mitigating global warming impacts. By 2030, we are committed to achieving net zero operational emissions for our non-refining operations.

We seek supplier partners who are actively looking at opportunities to reduce their own emissions, which in turn are our Scope 3 supply chain emissions. We are also actively seeking opportunities to reduce our impact on the environment, including in the waste and packaging generated from our operations and the products we sell.

For more information on our Greenhouse Emissions reductions and Waste Diversion initiatives, refer to our latest Sustainability Report and Annual Report.

It is the responsibility of our Suppliers to:

- Ensure all products supplied to Viva Energy comply with all local, state, national and international laws (where applicable) and regulations in which they are produced and sold. Evidence may be requested to demonstrate compliance;
- Comply with the relevant Viva Energy Own Brand standards and requirements;
- Adhere to Viva Energy's Quality and Food Safety Standards Supplier Guide;
- Commit to preserving biodiversity and advancing environmentally sustainable and socially equitable practices in the farming and forestry sectors; and
- Take active steps to reduce their own Greenhouse emissions, and contribute to creating circular economy opportunities and partner with Viva Energy on reaching our objectives.

SUPPLIER COMMITMENT

If a Supplier is not in compliance with the requirements of this Code, Viva Energy will endeavour to give the Supplier the opportunity to remedy the non-compliance. A serious breach or continued non-compliance may lead to Viva Energy ending the Supplier's engagement.

REPORTING CONCERNS

We expect our Suppliers to immediately report any suspected or actual contravention of this Code. To make such a report, or to otherwise raise concerns or seek advice, you can speak to your Viva Energy representative, or contact the Viva Energy Stopline (anonymously if you prefer) via:

Phone 1300 30 45 50 (8am to 8pm (AEST) Monday to Friday)

Email vivaenergy@stopline.com.au

Web vivaenergy@stoplinereport.com

Fax Viva Energy Australia c/o
The Stopline + 61 3 9882 4480

Post Viva Energy Australia c/o The Stopline, Locked Bag 8,
Hawthorn Vic 3122

The Viva Energy Stopline is an independent and confidential service to receive information relating to improper conduct and supports this Code.

Individuals calling the Viva Energy Stopline will talk in confidence to an experienced and independent operator. Reported concerns will be logged and handled in accordance with case management and investigation guidelines. Questions will be channelled to the appropriate people who can answer them.

Reports will be handled in accordance with Viva Energy's Whistleblower Policy.

REVIEW OF THIS CODE

This Code will be reviewed regularly to ensure that the Code and related procedures remain effective and appropriate. The Code cannot be amended without approval of the Board of Viva Energy Group Limited.

Meeting the objectives outlined in this Code is of the utmost importance and we have embedded comprehensive governance and programs of work to ensure we meet them, including:

- Responsible sourcing objectives outlined in our Procurement Policy;
- Prospective supplier due-diligence and communication of our objectives;
- Stakeholder engagement and education;
- Employee training and learning modules; and
- Continuous improvement and policy evolution.

LINKS TO OTHER RELEVANT DOCUMENTS

- Business Principles and Code of Conduct
- Anti-Bribery and Corruption Policy
- Human Rights Policy
- Modern Slavery Statement
- Our Biodiversity Approach
- Sustainability Report
- Our Commitment to Health, Safety, Security and Environment



Approved by the Board 16 October 2024