



Business Principles and Code of Conduct

Viva Energy Group Limited (ACN 626 661 032)
Approved by the Board on 10 April 2024

vivaenergy.com.au

Message from the CEO

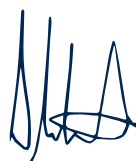
Viva Energy is a leading retail, commercial and energy company with a history spanning more than 120 years in Australia. Today we operate Australia's largest convenience retail network, make a significant contribution to the nation's energy security, and play a key role in supporting the transition to lower carbon energies.

The enviable reputation that we enjoy amongst our customers, business partners, stakeholders and broader community is the culmination of contributions from generations of employees and contractors who have represented the company and lived our values and culture in the way we have gone about building and growing this very successful business. We should never take this reputation for granted.

As the current custodians of this business, we have a collective responsibility to nurture and further this reputation for our own success and for future generations.

The Business Principles and Code of Conduct clearly set out the values, behaviours and expectations which guide the way we carry out our work and conduct our business activities. Everyone is expected to be familiar with these expectations and ensure that their actions and behaviour reflect these at all times.

The Business Principles and Code of Conduct are fundamental to how we conduct our business and living by them is crucial to our continued success.



Scott Wyatt
CEO, Viva Energy Group Limited

Introduction

The Viva Energy Business Principles and Code of Conduct sets out the key principles and expectations which are fundamental to how we conduct our business. They apply to all team members employed by all Viva Energy companies, as well as contractors and consultants who work within our businesses or represent the company through the provision of products and services on our behalf. Joint venture companies not under Viva Energy control are encouraged to adopt similar principles and standards.

A failure to follow the Business Principles and Code of Conduct may result in disciplinary action,

including termination of employment or any contract of engagement, and in some cases fines and imprisonment.

Review, Amendment and Publication

The Business Principles and Code of Conduct will be reviewed at least once every three years to ensure they remain effective and relevant to the current needs of the Company. The Board is responsible for approving the Business Principles and Code of Conduct and may make changes from time to time by resolution. The [Viva Energy Business Principles and Code of Conduct](#) are available on the Viva Energy website.

Viva Energy Group Limited (the **Company**) and its directly or indirectly wholly owned subsidiaries (together, **Viva Energy**) are separate and distinct entities. However, in this publication, the collective expression "Viva Energy" may be used for convenience when reference is made in general to entities in the Viva Energy group. Likewise, the words "we", "us", "our" and "ourselves" are used in some places to refer to the entities in the Viva Energy group in general. These expressions are also used where no useful purpose is served by identifying any particular company or companies.

Reporting concerns

You must immediately report any suspected or actual contravention of the Code of Conduct. To make such a report or to otherwise raise concerns or seek advice you can speak to:

1. your line manager, supervisor, or any other senior manager such as representatives from People and Culture, HSSE, or Legal Teams
2. the Viva Energy Head of Legal and Internal Audit, Chief Strategy Officer, or Chief People and Culture Officer
3. 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 Stopline +61 3
9882 4480

Post: Viva Energy Australia c/o Stopline, PO
Box 403, Diamond Creek VIC 3089

The Viva Energy Stopline is an independent and confidential service to receive information relating to alleged illegal, fraudulent, unethical or other improper conduct, and supports the Business Principles and Code of Conduct.

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](#).

4. The Respect at Viva line via:

Phone: 1300 346 032 24 hours a day, 7 days a week.

Email: RespectatViva@stopline.com.au

The Respect at Viva line is for team members who may be experiencing or witnessing inappropriate behaviour such as discrimination, bullying, harassment or sexual harassment in their workplace.

Concerns raised to the 'Respect at Viva' service will be directed to an experienced and independent operator. Concerns can be raised anonymously if requested and will be handled in accordance with case management and investigation guidelines.

Reports made to the 'Respect at Viva' line are not subject to the Whistleblower Policy and do not qualify for whistleblower protection.

Monitoring compliance

Reports on the number and type of reported breaches of the Code of Conduct, together with the results of investigations conducted will be provided to:

1. the CEO (or their delegate), the Chief Strategy Officer, the Head of Legal and Internal Audit, and the Chief People and Culture Officer on a regular basis; and
2. the Audit and Risk Committee at least every six months.

The Board will be promptly informed of any material breaches of the Code of Conduct by a director or senior executive and any other material breaches of the Code of Conduct that call into question the culture of the Company.

Stakeholder Responsibilities

Viva Energy companies recognise five groups of stakeholders to which we have responsibility in respect of our Business Principles.

(a) To shareholders

To protect shareholders' investments and provide a long-term return that is comparable with other leading companies of a like nature in Australia.

(b) To customers

To win and maintain customers by developing and providing products and services which offer value in terms of price, quality, safety and environmental impact, and which are supported by the requisite technological, logistics, environmental and commercial expertise.

(c) To team members

To respect the human rights of our team members and to provide them with safe working conditions and competitive terms and conditions of employment. To promote the development and best use of the talents of our team members; to create an inclusive work environment where every team member has an equal

opportunity to develop their individual skills and talents.

To encourage the involvement of and consultation with team members 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 team members.

(d) To those with whom we do business

To seek mutually beneficial relationships with contractors, suppliers and joint venture partners to promote the application of the business or equivalent principles in such relationships. The ability to promote the Business Principles effectively will be an important factor in the decision to enter 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, the environment and community.

Business Principles

Principle 1 – Sustainability

Long-term profitability is essential to achieving our business goals and to our continued growth. It is a measure both of efficiency and the value that customers place on Viva Energy products and services, supplying the necessary resources for the continued investment that is required to keep our business operating and develop future products and services to meet customer needs. Without profits and a strong financial foundation, it would not be possible to fulfil our responsibilities.

In achieving these economic goals, we commit to balancing short-term needs and interests with those of future generations, and integrating economic, environmental, and social considerations into business decision making. We are open and transparent about our sustainability performance and progress through the preparation and release of the annual [Viva Energy Sustainability Report](#).

Principle 2 – Business Integrity

Viva Energy complies with all applicable laws and regulations of the jurisdictions in which we operate. We also insist on honesty, integrity and fairness in all aspects of our business and expects the same from all those with whom we do business.

The direct or indirect offer, payment, soliciting or acceptance of bribes in any form is unacceptable, and facilitation payments must not be made. For more information see the “Anti-Bribery and Corruption” section of the Code of Conduct.

Viva Energy supports free enterprise. We seek to compete fairly and ethically and within the framework of applicable competition laws and we will not prevent others from competing freely with us. For more information, see the “Competition law” section of the Code of Conduct.

All business transactions on behalf of an entity in the Viva Energy group must be reflected accurately and fairly in the accounts of the relevant entity in accordance with established procedures and are subject to audit and disclosure.

Principle 3 – Safe and Inclusive

Viva Energy promotes a safe and inclusive culture which is based on our core values.

Integrity:	the right thing always
Responsibility:	to our communities
Curiosity:	be open, learn, shape our future
Commitment:	accountable and results focused
Respect:	diversity and inclusiveness

We are committed to ensuring all team members have the capability and right to a fair, safe and productive work environment where they can develop to their full potential.

We manage the physical and social impacts of our business activities carefully and work with others to enhance the benefits to local communities and seek to mitigate any negative impacts from our activities. We take a constructive interest in societal matters, directly or indirectly related to our business.

We have a systematic approach to health, safety, security and the environment. To this end, Viva Energy manages these matters as critical business activities, sets standards and targets for improvement, and measures, appraises and reports performance externally. For more information, see the “Health, safety and environment” section of the Code of Conduct.

Principle 4 – Transparency

Viva Energy recognises that regular dialogue and engagement with our stakeholders is essential and is committed to the transparent reporting of our performance. In our interactions with team members, business partners and local communities, we seek to listen and respond honestly and responsibly.

Viva Energy does not make payments to political parties, organisations or their representatives. When dealing with governments, Viva Energy will make its position known on any matters which affect the company, team members, customers, shareholders or local communities, in a manner which is in accordance with our values and these Business Principles. For more information, see the “Political activities and payments” section of the Code of Conduct.

Code of Conduct

1. ANTI-BRIBERY AND CORRUPTION

Viva Energy does not tolerate bribery, insider dealing, 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. Even unsubstantiated claims of corruption can damage reputations and business.

Bribery and Corruption

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

Bribery and corruption, whether involving government officials or commercial entities, can be direct or indirect through third parties such as agents and joint venture partners, and includes facilitation payments.

Even turning a blind eye to your suspicions of bribery and corruption can result in liability for Viva Energy and for you personally.

(a) Your responsibility

You must be familiar with, and strictly comply with, the requirements of the Viva Energy Anti-Bribery and Corruption Policy.

Specifically, you must not offer, pay, make, seek or accept a personal payment, gift or favour in return for favourable treatment to gain any business or personal advantage or to influence business decisions.

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 foreign laws which may also apply to conduct in Australia (for example, laws of the United Kingdom and United States).

(b) How you can do the right thing

- 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 or personal advantage.
- Ensure people you work with understand that bribery and corruption is unacceptable. Perform due diligence on counterparties such as suppliers (especially those (who represent us to government organisations), joint venture partners, social investment partners, and entities in which Viva Energy plans to invest in accordance with Viva Energy's applicable guidelines and policies.

- If you receive any explicit or implied request for a bribe, or if you are ever offered a bribe, from a third party (including government officials), report it to your line manager, the Chief Strategy Officer, the Head of Legal and Internal Audit, or a member of Viva Energy's Legal Team.

- Report your concerns if you suspect or know of any activity that could amount to bribery and corruption in Viva Energy or in any party (entity or individual) that Viva Energy does business with.

(c) Relevant Policies

- [Anti-Bribery and Corruption](#)

Gifts and hospitality

Viva Energy recognises that the occasional acceptance or offer of modest gifts or hospitality may be a legitimate contribution to good business relationships. However, all gifts and hospitality must comply with the following requirements and the Viva Energy Anti-Bribery and Corruption Policy.

(a) Your responsibility

Providing or receiving gifts and hospitality must never influence your business decisions nor place you or Viva Energy under any obligation, or be perceived to do so.

You should be particularly careful when offering gifts and hospitality, including travel-related expenses, to government officials (which includes employees of government authorities such as regulators, or government-owned businesses, local councils and spouses or immediate family members of government officials). Gifts and hospitality that are acceptable between private business partners may be unacceptable between a business and a government official.

(b) How you can do the right thing

- Never offer, give, seek or accept illegal, inappropriate, or excessive gifts and hospitality, cash or cash equivalents (including per diem payments), loans or personal services.
- Decline gifts and hospitality if you would feel

uncomfortable telling your line manager or supervisor, colleagues, family, friends or the public that you accepted them.

- Do not give or receive gifts and hospitality that can be linked to important business decisions during sensitive decision periods (such as when responding to a tender, seeking tenders or applying for government approvals).
- Record any gifts and hospitality received or given (whether accepted or declined) above A\$250 (A\$50 for Government officials) in the Viva Energy Gifts and Hospitality Register (and otherwise comply with the requirements of Register). This includes gifts offered to your spouse or family members.
- You should discuss with your line manager or a member of Viva Energy's Legal Team any situation where you are in doubt.

(d) (c) Relevant Policies

- [Anti-Bribery and Corruption](#)

Conflicts of interest

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

(a) Your responsibility

You must avoid conflicts of interest. Your Viva Energy decisions must not be influenced by personal and private considerations.

The Viva Energy Board must approve any related party transactions, including business transactions and the provision of consultancy or similar services.

(b) How you can do the right thing

- Declare to your line manager or supervisor any matter that could influence or be perceived to influence your decisions or actions at Viva Energy and give your line manager all the relevant facts in writing.
- Register all actual or perceived COI in the Viva Energy Conflicts of Interest Register. Line managers must agree and record any actions required to mitigate the COI.
- Make it known, and withdraw from 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 community, government, educational and other non-profit organisations if you comply with relevant laws, regulations and this Code of Conduct.
- You can acquire interests in other businesses and perform external professional activities in your own time if no actual or potential COI would result. If in doubt, please consult your line manager or supervisor.

- Be mindful of actual and perceived conflicts that can arise in the context of close personal relationships with another team member. For example, a conflict of interest will arise from a personal relationship if you have a family, business or personal relationship (including a personal financial interest, sharing living quarters or a romantic relationship) with any other team member within the Viva Energy group and that relationship causes, or might reasonably be anticipated to cause, an inability on your part or their part to perform responsibilities objectively and impartially.
- For team members entering into a consensual romantic/personal relationship, particular consideration should be given to perceived or real imbalances in positional power, reporting lines and/or team dynamics. Team members who have the responsibility for or authority to affect the careers or employment of other team members must perform their functions free from any conflict of interest arising from a personal relationship.
- You must disclose any COI arising from a personal relationship to either your line manager or supervisor, the Chief Strategy Officer and Sustainability Officer or the Chief People and Culture Officer. Such disclosures will be treated confidentially.

Market Abuse

Market abuse refers to insider dealing and market manipulation. You are involved in insider trading when you trade in shares or other investments in a regulated market (such as commodities and related contracts) while in possession of material non-public information or when you share this information with someone else who then trades in those shares or other securities.

Market manipulation means giving out false or misleading information or engaging in conduct in order to influence the price of a share or other investment in a regulated market (including a commodity or contract relating to a commodity).

(a) Your responsibility

You must protect confidential business information and never use it for your own benefit, especially to trade in shares or other securities or recommend anyone else to do so.

(b) How you can do the right thing

- Do not buy or sell shares in any company or trade in other investments while you have inside information about those shares or investments, even if you are no longer a Viva Energy team member or performing work for Viva Energy as a contractor.
- You must not spread rumours, mislead by sharing false information or manipulate prices.
- If you believe a colleague to be involved in insider dealing or market manipulation, report this through the

appropriate channel.

(c) Relevant Policies

- [Security Trading Policy](#)

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 the financing of terrorism. Offences covered by anti-money laundering legislation include prejudicing or obstructing an investigation and failing to report suspicious activity.

(a) Your responsibility

Viva Energy could be exploited by criminals to launder money or fund criminal activities. You must conduct appropriate counterparty due diligence to understand the business and background of our prospective business partners and to determine the origin and destination of money and property.

You must not falsify, conceal, destroy or dispose of relevant documents.

(b) How you can do the right thing

- report suspicious transactions or suspected incidents of money laundering (Viva Energy will then, in turn, report appropriate matters to authorities).

(c) Relevant Policies

[Anti Bribery and Corruption Policy](#)

Political activities and payments

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

(a) Your responsibility

You must not contribute Viva 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 Viva Energy. Political activity and payments can cause a conflict of interest and can harm Viva Energy business dealings and reputation.

2. PROVIDING A SAFE WORKPLACE

Viva Energy promotes a culture based on our values of integrity, responsibility, curiosity, commitment and respect. We are committed to ensuring all team members have the capability and right to a fair, safe and productive work environment where they can develop to their full potential.

Health, Safety, Security and Environment (HSSE)

At Viva Energy 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”.

The Viva Energy Commitment to HSSE Policy and HSSE management systems set out the expectations and requirements for managing the potential impacts of our operations and delivery of projects on team members, contractors, visitors, customers, the community and the environment. This is a systematic approach to the management of HSSE matters and is designed to deliver compliance and to achieve continuous improvement.

(a) Your responsibility

You must understand and follow the policies, procedures and rules that govern the work you are required to perform and must not deviate from these without explicit approval from your supervisor or manager. Do not perform any operational activity unless you are adequately trained and/or supervised and fit for work. This extends to team members and contractors working under Viva Energy’s operational control.

(b) How you can do the right thing

- Take reasonable care of the health and safety of yourself and others.
- Ensure that you are fit for work. This means that you are in a state, both physically and psychologically, to perform tasks assigned to you competently and in a manner that does not compromise your own health and safety or that of others.
- Understand and plan your tasks and discuss how these will be safely undertaken.
- Always follow Viva Energy’s applicable policies and guidelines, including in relation to HSSE matters.
- Have the courage to intervene or stop work at anytime if you are concerned about the safety of yourself or others. Have the character to accept an intervention from others.
- Comply with safe work practices and the direction given by your supervisor to avoid injury to yourself, others and to reduce negative impacts to the environment, plant, equipment and our reputation.

- Ensure you are qualified to undertake the work and use the required personal protective equipment and clothing. Do not misuse, ignore or interfere with any safety equipment.
- Report all incidents and near misses as soon as possible to share learning and prevent recurrence. Report all known or observed hazards to your supervisor or managers.
- Understand when we need to report incidents (either safety or related to the environment) to the relevant regulators. If you don’t know, speak with your supervisor.

(d) Relevant Policies

- [Commitment to Health, Safety, Security and Environment](#)

Equal Opportunity

At Viva Energy we promote an inclusive workplace that strives to support all team members and provide equal opportunity. Viva Energy’s employment-related decisions will be based on relevant qualifications, merit, performance and other job-related factors. We will not tolerate unlawful discrimination relating to employment or otherwise.

Under federal and state legislation, unlawful discrimination occurs when someone, or a group of people, is treated 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 some other characteristic specified under anti-discrimination or human rights legislation.

(a) Your Responsibility

Show respect to everyone you deal with and behave fairly towards them according to our values of integrity, responsibility, curiosity, commitment and respect and in line with the Viva Energy Business Principles. You should understand the value we place on diversity and never discriminate.

(b) How you can do the right thing

- You should base hiring, evaluation, promotion, training, development, discipline, compensation and termination decisions on qualifications, merit, performance, behaviours and business considerations only.
- Do not discriminate according to race, colour, religion, age, gender, sexual orientation, marital status, physical features, disability, ethnic origin, nationality, parental status or status

as a carer, pregnancy or potential pregnancy, trade union membership, industrial activity or inactivity, political belief or activity, or any other unlawful grounds.

(c) Relevant Policies

- [Our Commitment to Human Rights](#)
- [Inclusion and Diversity Policy](#)

Harassment, including sexual harassment and bullying

Sexual and other forms of harassment and bullying is unlawful under both federal and state legislation and such conduct is unacceptable. Viva Energy will not tolerate sexual or other forms of harassment, nor any other action, conduct or behaviour that is humiliating, intimidating or hostile.

This includes conduct at Viva Energy workplaces in the course of conducting our operations, which includes when working remotely, as well as at events and locations associated with work, such as conferences and training, restaurants and hotels for work travel and events.

Harassment is conduct that makes another person feel intimidated, insulted or humiliated because of their race, colour, national or ethnic origin; gender; disability; sexual orientation; or a characteristic specified under anti-discrimination or human rights legislation. The conduct can be physical, spoken or written (including via email and on social media). It can include behaviours such as belittling, making unreasonable demands, telling insulting jokes; making derogatory comments and taunts about particular groups or an individual's personal characteristics. A one-off incident can constitute harassment.

Sexual Harassment is any unwanted or unwelcome sexual behaviour where a reasonable person would have anticipated the possibility that the person harassed would feel offended, humiliated or intimidated. Unwanted sexual behaviour is subjecting a person to any act of physical intimacy, or making a comment verbally or in writing that has sexual connotations to or about a person in their presence. The motivations or understanding of the harasser are irrelevant – it does not matter if he/she believes that the behaviour is welcome.

Bullying is repeated unreasonable behaviour towards an

individual or group which intimidates, offends, degrades or humiliates. It can range from obvious verbal or physical assault to subtle psychological abuse such as undermining delivery of work by deliberately withholding information needed for effective work performance.

(a) Your responsibility

You should understand and comply with Viva Energy's requirements not to engage in behaviour that may amount to harassment (including sexual harassment), discrimination or bullying.

Treat others with respect and avoid situations that may be perceived as inappropriate. If you feel safe to do so, intervene with someone if you find their behaviour hostile, intimidating or humiliating.

(b) How you can do the right thing

- 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.
- Never engage in behaviour of a sexual nature that may be unwelcome or unwanted. If you are unsure whether behaviour is unwelcome or unwanted, assume that it is.
- If you feel safe to do so, speak up and tell the person if you are upset by their actions or behaviour. Explain why and ask them to stop. If this is not an option, then you should speak to your line manager, People & Culture Lead, a trained Viva Energy Contact Officer, or contact the "Respect@Viva" reporting line.
- Be an 'active bystander', either by intervening in the moment where you see or hear inappropriate behaviour or by reporting your observations to your line manager, People & Culture Lead, a trained Viva Energy Contact Officer or contacting the "Respect@Viva" reporting line.

(d) Relevant Policies

- [Our commitment to human rights](#)
- [Prevention of Sexual Harassment in the Workplace](#)

3. NATIONAL AND INTERNATIONAL TRADE

Viva Energy is committed to free, fair and ethical business. You must follow all applicable trade laws and ensure that Viva Energy's values are applied in your dealings.

Competition law

Competition laws protect free enterprise and prohibits behaviour that limits trade or restricts fair competition. These laws apply to every level of business. They are in place to combat illegal practices like price-fixing, market-sharing or bid-rigging conspiracies, or behaviours that aim to achieve or maintain a monopoly position in the market. Viva Energy is committed to free, fair and ethical enterprise and does not tolerate violation of competition laws.

(a) Your responsibility

You must not agree with competitors of Viva Energy to fix price or any elements of price (such as discounts, rebates or surcharges), agree with independent dealers or resellers to fix a minimum resale price of a product, or 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 trade sanctions imposed by law. Agreements with competitors to reduce or stabilise production, capacity or output are forbidden.

Anti-competitive behaviour will damage Viva Energy's business and reputation. Breach of competition laws can severely damage our business and expose us to criminal charges. You could also face dismissal, fines or imprisonment.

(b) How you can do the right thing

- Do not agree, even informally, with competitors on matters relating to pricing, production, customers or markets without a lawful reason. Always get legal advice on whether a practice is lawful.
- Decisions on Viva Energy pricing, production, customers and markets must be made by Viva Energy alone.
- Do not discuss with competitors which suppliers, customers or contractors Viva Energy deals with or intends to deal with; or which markets Viva Energy intends to sell into or on what terms Viva Energy will deal.
- Leave industry meetings if competitively sensitive issues arise and ensure your departure is noticed and recorded/minuted. Report the matter immediately to a member of Viva Energy's Legal Team.
- Report your concerns if you know of any potentially anti-competitive practices or if you are uncertain whether practices are legal or not.

Trade controls and sanctions

Trade (export and import) controls and sanctions laws give countries legal control over the sale, purchase, shipment or transmittal of goods and services, software and information across international borders. Exports include transfers electronically, and also via discussions or visual inspections within Australia involving foreign nationals (i.e. not only through traditional shipping methods).

Trade control laws apply to Viva Energy as a company and also to you personally. Failure to observe trade controls and sanctions laws can cause operational delays and damage our business and reputation. Viva Energy could also face legal consequences, including fines and loss of privileges. You could face dismissal, fines or imprisonment.

a) Your responsibility

When exporting, think carefully about the potential impact of export control laws, licenses and sanctions before transferring goods, technology, software or services across international borders. Remember that controls and sanctions (or embargoes) can be imposed against countries, entities, individuals and categories of goods or services. You must know which of these controls or sanctions may result in restrictions or prohibitions on the way you conduct business.

When importing, assess your counterparty and the origin of the goods/services being imported to ensure that there are no trade controls/sanctions that apply. Remember that trade controls and sanctions (or embargoes) can be imposed against countries, entities, individuals and categories of goods or services. Furthermore, you must meet import requirements when bringing goods or services into a country, ensuring applicable duties, levies and taxes are paid. You must not bring restricted or prohibited goods into a country without declaring them.

Seek legal advice if you have doubts about export and import controls or sanctions.

4. SAFEGUARDING INFORMATION AND ASSETS

Intellectual, physical and financial corporate assets are valuable and must be preserved, protected and managed properly. Personal information and intellectual property (IP) must be safeguarded. Information technology (IT) and communications equipment and facilities should be used responsibly. Records must be accurate and appropriately retained. Fraud, theft, abuse or misuse of Viva Energy assets is unacceptable.

Intellectual property and protection of assets

Corporate assets can be financial, physical or intangible and include buildings, equipment, funds, software, know-how, data, patents and other intellectual property (IP). IP assets and rights, including patents, trademarks, know-how, and trade secrets relating to Viva Energy's operations or technologies are valuable assets.

(a) Your responsibility

Everyone at Viva Energy has a responsibility to ensure we protect and safeguard our assets and information.

Intellectual, physical, and financial corporate assets are valuable and must be preserved, protected, and managed properly. Personal information and intellectual property (IP) must be safeguarded. Technology and communications systems should be used responsibly. Records must be accurate and appropriately retained.

You must protect Viva Energy assets (including company funds, property or equipment) against waste, loss, damage, misuse, theft, misappropriation or infringement. These assets must not be used for personal benefit and you must also take appropriate precautions to prevent their theft, damage or misuse. You must use Viva Energy assets appropriately and responsibly.

If incurring business-related expenses, you must do so sensibly and effectively, consistent with Viva Energy's policies and procedures. No entries should be made in Viva Energy's records that distort or disguises the true nature of any transaction. Submission of a fraudulent expense report is regarded as serious misconduct. The misuse of any of Viva Energy's assets constitutes theft and/or fraud.

Viva Energy companies must properly protect Viva Energy IP and all third party IP that Viva Energy companies are entitled to use under licence. You must respect the physical and intangible assets of others. Third party IP rights must not be knowingly infringed.

Use of Technology

We are all responsible for protecting data, devices and technology belonging to Viva Energy, and ensuring data and information processed, stored or communicated on these systems is not compromised and access to unauthorised individuals is prevented.

All technology services are provided for your use for the

conduct of Viva Energy's business operations. Technology services include computers, communication devices, software and systems. A limited use of Viva Energy Technology services for personal use is generally acceptable. The use, including your personal use, of Viva Energy technology services is logged and monitored.

(a) Your responsibility

You should apply high ethical standards, comply with applicable laws and regulations, and ensure you meet the principles in this section of the Code of Conduct when using Viva Energy IT and communication devices.

Protect the confidentiality and security of any Viva Energy assigned personal identification, authentication and access control information or device, including facility access devices (keys and swipe-cards), pin numbers and passwords, and use the other applicable Viva Energy security measures.

You will be held accountable for all access to Viva Energy computer systems via any company assigned personal identification, authentication and access control device.

(b) How you can do the right thing

- Report to Viva Energy's IT service desk all incidents when data or functionality is not available, confidentiality has been lost (including loss or theft of equipment such as computers, mobile phones, tablets, external drives and memory sticks), integrity and/or regulatory compliance has been compromised.
- Use Viva Energy approved computers for business purposes to reduce the risk of a breach because they are configured with hardware specifications and software controls that have an encrypted hard drive and other security controls that meet our standards.
- Do not install software or modify configurations that compromise our technology's security without authorisation. Only use Viva Energy-approved solutions to backup data.
- Do not take equipment, data, or software off-site without prior authorisation. Those users issued with a company laptop are authorised to take the laptop offsite. When removed from site, you are responsible for ensuring appropriate security measures are in place to ensure the security of the device and information.
- Computer workstations/laptops must be locked, logged out or shut down when you leave your workstation unattended and at the end of the work

day. Portable devices like laptops and tablets that remain in the office overnight must be shut down and securely locked away.

- Do not use Viva Energy IT or communication facilities for unlawful or immoral activities or purposes (including the violation of IP rights or the commission of cybercrime), or to gamble, or to conduct your own business activities.
- Do not use the Viva Energy network or data storage space on the network for entertainment purposes or to store your personal data.
- Do not upload, download, send or view indecent or objectionable material or material that is illegal or which could cause offence, anxiety, inconvenience or annoyance to your colleagues.

Privacy

Privacy laws safeguard information about individuals. Viva Energy respects the basic right of individuals – including team members, customers and suppliers – to privacy.

All personal information that Viva Energy collects in the course of conducting our business is handled in compliance with all applicable laws, including the Privacy Act and the Australian Privacy Principles. We maintain organizational, physical and technical security arrangements for the personal data we hold.

You must respect a person's right to privacy and follow applicable laws and Viva Energy's Privacy Policy when gathering or using their data. Personal information about individuals must be protected from misuse. You must follow correct procedures when collecting, using and sharing this data.

Records management

Records are valuable company assets and must be properly managed. Viva 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 Viva Energy business or corporate memory. It is the content which determines a record not its format. Records include contracts, audit reports, financial information, product specifications, corporate policies, guidelines and procedures and minutes of meetings.

You must understand which information is a record and which must, therefore, 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, reputation, compliance and regulatory consequences and can breach legal,

accounting, tax and regulatory requirements. Individuals must manage their records in accordance with Viva Energy's applicable guidelines and policies on records management.

5. COMMUNICATIONS

Your communications are a reflection on Viva Energy. Ensure your communications are necessary and appropriate and that you follow applicable Viva Energy guidelines relating to communications and/or branding, any Viva Energy internal procedures and Viva Energy policies (including the Privacy Policy). Inappropriate, inaccurate or careless communication across any medium or channel (including social media) can create serious reputation, liability and compliance risks for you and Viva Energy.

Business communications and public disclosure

Viva Energy has obligations under the ASX Listing Rules and the Corporations Act in relation to the periodic and continuous disclosure of information about the company and its operations. Viva Energy is committed to ensuring compliance with these obligations and to ensuring that all shareholders and the market are provided with complete and timely information regarding Viva Energy's activities.

(a) Your responsibility

Any written or oral communication, including content on Viva Energy's website/social media platforms and external presentations, made publicly on behalf of Viva Energy is a public disclosure. You must not make public disclosures about Viva Energy's business activities if you are not authorised to do so including on personal communication channels including social media platforms.

You must protect confidential information and not disclose confidential information to companies or individuals outside the Viva Energy group unless you are authorised to do so.

If you are authorised to disclose information you must ensure it is true, accurate and not misleading. You must not engage with the media without clearance from the Viva Energy External Communications Team.

You must observe mandatory rules issued in relation to business communications.

(b) How you can do the right thing

- Ensure that all verbal and written communications (including emails) do not mislead or deceive customers, stakeholders or other businesses and otherwise comply with the Competition and Consumer Act, Spam Act and the Privacy Act.
- Comply with all applicable Viva Energy policies, including the Disclosure Policy, guidelines, standards and requirements regarding the disclosure of information and information security classifications. Comply with all applicable laws and regulations.
 - Do not engage with the media unless the required clearances have been obtained from the External Communications Team.
- Only make public disclosures if you have been authorised by your line manager and the Company

Secretary to do so.

- Make sure that you adhere to the Viva Energy brand guidelines and obtain prior approval from the Viva Energy brand manager whenever you wish to use Viva Energy branding and/or Shell trademarks.

(c) Relevant Policies

- [Viva Energy Disclosure Policy](#)

Social Media

Viva Energy supports the use of social media as an important tool of business engagement. However, when engaging in social media, either for personal use or when representing Viva Energy, team members and contractors must be aware of, and comply with, the requirements of this Code of Conduct.

(a) Your responsibility

You are personally responsible for what you publish on any form of social media.

You must not represent Viva Energy or entities with which Viva Energy has a relationship (Relationship Entities) in social media unless you are authorised to do so.

If authorised, you must ensure that all communications comply with the requirements of this Code of Conduct, in particular those set out in the "Business communications and public disclosure" section, and with any requirements imposed by the relevant Relationship Entity.

If using social media in a personal capacity, your communications/social media activity must not bring Viva Energy (or its Relationship Entities) into disrepute or otherwise negatively impact on the reputation of Viva Energy (or its Relationship Entities), must not disclose confidential information and must not infer or imply Viva Energy's (or any Relationship Entities) endorsement of your personal views.

Your personal use of social media (either using Viva

Energy IT equipment or your own) must not compromise your effectiveness at work or fulfilling your responsibilities.

(b) How you can do the right thing

- You are encouraged to actively engage in official online communities and social media platforms, however, you must not create your own official or unofficial presence using Viva Energy logos or trademarks, or use logos or

COMMUNICATIONS

- trademarks used by Viva Energy under licence (including Shell branding, logos or trademarks).
- You must not represent Viva Energy on social media unless you are authorised to do so by the Viva Energy brand manager and/or a member of the External Communications Team. If so authorised, then you must
 - Disclose that you are a Viva Energy team member and be clear about which business you are representing and your role.
 - Disclose only publicly available information. You must not comment on or disclose confidential or market sensitive information about Viva Energy or any of its Relationship Entities, partners, vendors or customers.
 - Ensure that the content that you publish is true and factually correct.
 - Ensure you are not the first to make a Viva Energy announcement unless you are authorised to do so.
 - Be respectful of all individuals and communities you interact with online.
 - Not post material that is obscene, defamatory, threatening, discriminatory or hateful to any person or entity or is otherwise unlawful.
 - Not disclose other people's personal information.
 - Correct any error quickly if you think you have made one (declare that you are modifying an earlier post or remove it immediately).
 - Respect copyright, privacy, financial disclosure and other applicable laws when publishing on social media platforms.
 - Check with the Viva Energy brand manager and/or the External Communications Team if you are not sure what you can reproduce or disclose on social media platforms.
- If you choose to make reference, in a personal capacity, to Viva Energy, its interests, partners, Relationship Entities, vendors or customers you must:
 - Provide worthwhile information and perspective. Viva Energy's brand is best represented by its people and what you publish reflects on that brand.
 - Be mindful that what you publish will be public for a long time, protect your privacy and adhere to the relevant social media platform's terms of use.
 - Identify yourself and, where relevant, your role at Viva Energy when you discuss matters related to Viva Energy. You must make it clear that you are speaking for yourself and not on behalf of Viva Energy (or on behalf of any of its business partners) by using a disclaimer such as this: "The postings on this site are my own and don't represent Viva Energy's views or opinions."
- Respect any copyright, fair use and financial disclosure laws.
- Not disclose confidential or market sensitive information and never discuss Viva Energy business performance or other sensitive matters about business results or plans.
- Not make reference to partners, vendors or customers of Viva Energy in regard to business-related matters or publish content that might allow inferences to be drawn which could damage Viva Energy's relationship with its partners, vendors or customers.
- Not post material that is obscene, defamatory, threatening, discriminatory or hateful to any person or entity or is otherwise unlawful.
- If you identify yourself as a Viva Energy team member, ensure your online profile and related content is consistent with how you wish to present yourself with colleagues and customers.
 - Do not use Viva Energy logos or trademarks, or Shell branding, logos or trademarks. For example, you shouldn't use Viva Energy in your screen name or other social media identification.
 - Always use good judgment and common sense in deciding what you publish. If you are about to publish something that makes you even the slightest bit uncomfortable, review the guidance above and think about why that is. If you are still unsure, and it is related to Viva Energy business, discuss it with your line manager or supervisor.