

# Modern Slavery Statement

## Introduction

This statement is made on behalf of Vivo Energy Limited and its affiliates carrying on a business in the UK (“Vivo Energy”) pursuant to section 54(1) of the Modern Slavery Act 2015.

## About our business

Vivo Energy is a leading retailer and marketer of Shell and Engen branded fuels and lubricants in Africa. It operates in 28 countries across North, West, East and Southern Africa, marketing its products to retail customers through its network of around 4,000 Shell and Engen branded service stations, and to commercial customers through its commercial fuels and lubricants business.

## Combating modern slavery

Vivo Energy strongly supports the elimination of all forms of modern slavery. Such exploitation is entirely at odds with our core values of Safety, Excellence, Caring, Respect, and Integrity. These values are crucial to our success and growth, and to achieving our vision to be Africa’s leading and most respected energy business.

We have developed a clear set of principles, policies, and manuals to communicate how and why we do business the right way. Respect for human rights is embedded in the Vivo Energy Code of Conduct (“Code”) and the General Business Principles (“Business Principles”), which recognise a responsibility to conduct business as responsible corporate members of society and to support fundamental human rights in line with the legitimate role of business. Both the Code and the Business Principles explicitly address our commitment to combatting modern slavery and human trafficking.

Compliance with both the Code and our Business Principles is mandatory for all staff. Moreover, they also articulate the expectations we apply to those with whom we do business, and whether a contractor or supplier acts consistently with these values and standards is an important factor in the decision whether to enter or remain in business relationships.

We have developed specific measures to address the risk of modern slavery arising in parts of our business and supply chains that we consider represent a higher risk. For example, we have developed a compliance statement that we require all business partners to sign which communicates our expectations on modern slavery, requires the business partner to confirm they are not aware of any instances of modern slavery linked to their business, and requests that they take steps to communicate our expectations to any sub-contractors or agents with which they engage. These requirements are expressly embedded in our contracts with key business partners and suppliers.

We also rolled out a third-party code of conduct, which requires the business partners that we deal with to uphold human rights and abide by the principle that all their workers are employed on a freely agreed and voluntary basis. This includes treating their workers with respect and dignity and under no circumstances practising child labour.

In addition to the above, special campaigns have been launched to provide our Human Resources teams, retailers and transporters/hauliers with modern slavery guidance awareness and training. This entailed raising awareness on ‘red flags’ and how to report any instances of concerns relating to modern slavery. A specific focus was placed on getting the message across to the customer champions on our service station forecourts and drivers who transport our products, as although they are not directly employed by us, they are considered our most vulnerable for abuse.

As part of our Anti Bribery Management System, we have implemented special site inspections focused on identifying elements of modern slavery at our retail sites. We visit around six countries yearly where we conduct our assessments.

## Due diligence processes

Due diligence and know your counterparty (“KYC”) screening takes place, in line with the Vivo Energy KYC Policy, before any Vivo Energy entity enters a binding commercial contract with any high risk third party. We use global best practice including the use of reliable and independent risk database screening tools, documents, data and/or information where necessary to verify the identity of our business partners. This includes an evaluation of whether a potential business partner may be involved in any illegal or corrupt practices.

## Training

Mandatory all-staff training courses covering the Code, Combating Modern Slavery Guidance and our Business Principles are generally provided on a bi-annual basis, and new joiners are required to complete this training within three months of joining Vivo Energy. Our training material specifically addresses the risk of modern slavery, in order to better inform our employees about identifying warning signs and how to escalate concerns.

Enhanced modern slavery training is provided to all retail/supply and distribution staff to equip them in identifying and reporting modern slavery concerns at each of their retailer/transporter engagements.

## Reporting of concerns

Vivo Energy provides employees with safe and confidential channels to raise concerns and report instances of non-compliance with our Code or Business Principles. In turn, Vivo Energy expects its employees and counterparties to report suspected breaches.

The Vivo Energy Global Helpline is available 24 hours a day, 365 days a year, to all employees and contract staff in Vivo Energy and for third parties with whom Vivo Energy has a business relationship (such as customers, suppliers, agents) if they observe wrongdoing or wish to raise concerns, in full confidence and without fear of retaliation. Once a report has been made, the report is passed to the Vivo Energy Ethics and Compliance Office for appropriate assessment and if necessary, an investigation team will be assigned. Regular campaigns are launched via posters and screensavers to raise awareness of the option to report concerns without fear of victimisation. A specific reporting category has been included in the whistleblowing helpline to ensure that modern slavery concerns are promptly identified and escalated to the Chief Legal and Compliance Officer.

Whistleblowing helpline posters are placed at all our retail sites so that not only our employees are aware of the need to report a concern but also the retailers’ employees and/or third parties with any concerns.

All Modern Slavery concerns are investigated promptly and if founded, recommendations to rectify and address the concerns are treated with utmost urgency.

## Looking forward

Our enduring commitment to Vivo Energy’s values means that we will continue to seek ways in which we might improve our capacity to identify and deal with modern slavery risks in all aspects of our business and supply chains.

## Approval

This statement has been approved by the board of directors of Vivo Energy Ltd, for and on behalf of Vivo Energy.

**Stan Mittelman**  
**CEO**  
**Vivo Energy Ltd**

4 March 2025