



## Business Partner Code of Conduct



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VRO-POL-0018



# Table of Contents

1.	INTRODUCTION .....	3
2.	VIARO ENERGY’S CORE VALUES .....	3
3.	COMPLIANCE WITH LAWS AND REGULATIONS.....	3
4.	HEALTH, SAFETY, AND ENVIRONMENTAL RESPONSIBILITY .....	3
5.	ETHICAL BUSINESS PRACTICES.....	4
6.	HUMAN RIGHTS AND FAIR LABOUR PRACTICES .....	4
7.	RESPECT FOR LOCAL COMMUNITIES .....	5
8.	TRANSPARENCY AND DATA PRIVACY .....	5
9.	SPEAK UP AND REPORTING MECHANISM.....	5





## 1. Introduction

Viaro Energy Limited ('Viaro' or the 'Company') upholds the highest standards of business conduct and expects the same commitment from our business partners, contractors, and suppliers. This **Code of Conduct** guides how we and our business partners should act to ensure we operate with integrity, transparency, and respect for human rights, the environment, and the communities we serve.

Our reputation is one of our most valuable assets. This Code aims to maintain the highest standards of ethical conduct and business integrity to protect our business, partners, and the communities in which we operate.

## 2. Viaro Energy's Core Values

- **Integrity:** We act ethically in all business interactions and decisions, demonstrating fairness and transparency.
- **Collaboration:** We build strong, trusting relationships with our partners to achieve mutual success.
- **Excellence:** We strive for the highest operational performance, safety, and environmental stewardship standards.
- **Accountability:** We are responsible for our actions and committed to providing

## 3. Compliance with Laws and Regulations

All business partners must adhere to applicable laws and regulations in the jurisdictions in which they operate. This includes compliance with:

- Local and international trade laws.
- Environmental regulations.
- Anti-bribery and corruption laws.
- Sanctions Laws
- Fair Competition Laws

#### **4. Health, Safety, and Environmental Responsibility**

We are committed to creating a safe and sustainable operational environment. Viaro Energy expects its business partners to:

- Comply with all health, safety, and environmental laws, standards, and policies.
- Take proactive steps to minimise their operations' environmental impact and ensure their workforce's safety and well-being.
- Report any incidents or unsafe conditions immediately.

#### **5. Ethical Business Practices**

- **Anti-Bribery and Corruption:** We have a zero-tolerance policy towards bribery, corruption, and unethical conduct. Business partners are prohibited from offering or accepting bribes or engaging in corrupt activities.
- **Conflicts of Interest:** Business partners must avoid situations where their personal or financial interests conflict with Viaro Energy's interests. Any potential conflicts should be disclosed immediately.
- **Fraud and Financial Integrity:** All transactions and business records must be accurate and truthful. Partners must never falsify records or engage in fraudulent activity.
- **Anti-Money Laundering (AML):** Viaro Energy is committed to preventing money laundering and terrorist financing. Business partners must comply with AML laws and ensure their transactions are not linked to illicit activities. Partners should implement effective measures to detect and report suspicious transactions.

#### **6. Human Rights and Fair Labour Practices**

Viaro Energy is committed to respecting human rights, which is in line with our obligations under the Modern Slavery Act 2015 and ensuring fair labour practices. We expect our business partners to:

- Prohibit forced labour, child labour, and human trafficking within their operations and supply chains.
- Promote diversity, equity, and inclusion, ensuring equal treatment and opportunity for all workers.
- Comply with all applicable laws and regulations related to modern slavery and human trafficking.

## 7. Respect for Local Communities

We believe in building positive, lasting relationships with the communities where we operate. Our business partners are expected to:

- Engage with local communities respectfully and transparently.
- Minimise any negative impact on communities and contribute to their development through sustainable practices.
- Address community concerns and provide clear communication regarding business activities.

## 8. Transparency and Data Privacy

We are committed to transparency in all aspects of our business. Business partners must:

- Maintain accurate and complete records of business transactions and operations.
- Cooperate fully with audits and investigations, ensuring that all financial and operational documentation is accurate and verifiable.
- Ensure compliance with all legal obligations regarding data protection and privacy.

## 9. Speak Up and Reporting Mechanism

Viaro Energy encourages a culture of openness and sincerity. Business partners must provide mechanisms for employees, contractors, and suppliers to raise concerns about unethical behaviour or violations of this Code without fear of retaliation. We also offer the following confidential reporting channels:

- Email: [Groupcompliance@viaro.co.uk](mailto:Groupcompliance@viaro.co.uk)
- Independent Reporting Line: [www.safecall.co.uk/report](http://www.safecall.co.uk/report)

By adhering to this Business Partner Code of Conduct, we will collectively contribute to an environment of ethical and sustainable business practices. We appreciate the cooperation of our partners in upholding these standards, which are essential for the long-term success of Viaro Energy and the communities in which we operate.

Thank you for your continued commitment to high ethical standards.

**Francesco Mazzagatti**  
**Chief Executive Officer**  
**Viaro Energy Ltd**