

2017

ACACIA ENERGY GROUP
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CORPORATE CODE OF CONDUCT
EFFECTIVE MAY 1, 2017



CORPORATE CODE OF CONDUCT

ACACIA ENERGY GROUP
SWITZERLAND | MALTA | NETHERLANDS | USA | UK



Message from the Founder, President & CEO

Doing things the right way is one of our most important values at Acacia Energy Group. We work hard every day to provide products and services that meet our clients' demands and in the process, we do so to enhance the lives of our employees, the people in the communities in which we operate and all over the world.

We are very clear about what we mean when we speak about doing things the right way. It means that every step we take from our operations to the delivery of products, every step is taken with ethics and integrity in mind. We ensure our supply chain is of the highest integrity, and we monitor all of our operations for compliance to this code of conduct.

Doing things the right way is not an option at Acacia Energy Group. It's our mindset and working here means making a commitment to uphold our company's values and following the code of conduct outlined in this document.

Thank you for upholding our values and helping us to be one of the best energy suppliers that we can be.

James W. Head
Founder, President & CEO
Acacia Energy Group

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INTRODUCTION

This Code of Conduct applies to all employees, managers and executives of Acacia Energy Group. We also expect all contractors, subcontractors and suppliers to have a similar code of conduct before engaging in business with Acacia Energy Group.

ETHICAL PRINCIPLES AND CORE VALUES

The company's expertise is based on experience in international fuel trading. While most companies focus only on profits and their IRR (Internal Rate of Returns), we also focus on our own type of IRR of Integrity, Respect and Reputation. Our objective is to achieve this without losing the focus on creating opportunities for our partner companies, employees and the communities in which we operate.

Mission

- Our mission is to be the example within the fuel trading and petroleum commodities industry for providing quality service with uncompromised ethics, honesty and integrity

Vision

- A proven source within the fuel trading and energy industry in supplying our customer base
- Dedicated and direct proven sources of petroleum products from qualified sources

Values

- Dedicated customer service
- Reliable supply chain network
- Integrity and ethics
- Respect for others
- Responsibility and accountability for our actions

DECISION MAKING AND THE CODE OF CONDUCT

When making a decision, ask yourself the following:

- Is it legal?
- Does it comply with this code?
- Does it reflect our company values and ethics?
- Does it respect the rights of others?
- If you are unsure about any of the answers, ask.

REPORTING/SPEAKING UP

The company encourages all employees to ask questions and raise issues without fear of retaliation and is committed to treating reports seriously and investigating them thoroughly.

Employees must report suspected unethical, illegal or suspicious behavior immediately. The company does not tolerate retaliation against anyone who makes a good faith report of suspected misconduct or otherwise assists with an investigation or audit.

To report a concern:

- Talk to your manager
- Contact Human Resources
- Contact the Compliance office
- Call the anonymous hotline
- Make a confidential and/or anonymous report

NO RETALIATION

Employees who report a concern in good faith cannot be subjected to any adverse employment action including:

- Unfair dismissal, demotion or suspension
- Unfair denial of a promotion, transfer or other employment benefit
- Bullying and harassment, either in person or online
- Exclusionary behavior
- Any other behavior that singles out the person unfairly

EQUAL OPPORTUNITY

The company will not tolerate discrimination based on race, color, religion, gender, age, national origin, sexual orientation, marital status, disability or any other protected class.

HARASSMENT

Treat all fellow employees, customers, business partners and other stakeholders with dignity and respect at all times.

Any type of harassment, including physical, sexual, verbal or other, is prohibited and can result in disciplinary action up to, and including, termination.

Harassment can include actions, language, written words or objects that create an intimidating or hostile work environment, such as:

- Yelling at or humiliating someone
- Physical violence or intimidation
- Unwanted sexual advances, invitations or comments
- Visual displays such as derogatory or sexually-oriented pictures or gestures
- Physical conduct including assault or unwanted touching
- Threats or demands to submit to sexual requests as a condition of employment or to avoid negative consequences

BULLYING

We are committed to ensuring that our employees, our contractors and our customers work in safe and respectful environment that is free of bullying. Bullying can include:

- Spreading malicious rumor or gossip
- Excluding or isolating someone socially
- Establishing impossible deliverables
- Withholding necessary information or purposefully giving the wrong information
- Intimidating someone
- Impeding someone's work
- Unfairly denying training, leave or promotion
- Constantly changing work guidelines
- Sending offensive jokes or emails
- Criticizing or belittling someone constantly
- Tampering with a person's personal belongings or work equipment

CONFLICTS OF INTEREST

A conflict of interest can occur when an employee's personal activities, investments or associations compromises their judgment or ability to act in the company's best interests. Employees should avoid the types of situations that can give rise to conflicts of interest.

It's important for employees to disclose any relationships, associations or activities that could create actual, potential, or even perceived, conflict of interest to their manager or the Human Resources Department.

COMMUNICATION ON BEHALF OF THE COMPANY

Only the CEO & President, VP of Strategy and Business Development, VP of Operations, VP of Sales and Marketing and VP of Communications are authorized to represent the company to media and/or legal authorities. Employees should refer all requests for information or interviews to the Communications Department.

CONFIDENTIALITY

The company and its employees maintain the confidentiality of all proprietary information. Proprietary information includes all non-public information that might be harmful to the company and its customers and business partners if disclosed.

Confidential information can include:

- Customer lists
- Supplier lists
- Pricing information
- Terms of contracts
- Company policies and procedures
- Financial statements
- Marketing plans and strategies
- Trade secrets
- Any other information that could damage the company or its customers or suppliers if it was disclosed

PRIVACY

The company complies with the requirements of the country's and international privacy laws. All employees sign an agreement that contains provisions for information confidentiality and non-disclosure.

The company and its employees do not disclose any private, personal information of:

- Employees
- Customers
- Suppliers
- Competitors
- Third parties

Employees store all personal information securely, mark it as confidential and store it only for as long as it is needed for the purpose for which it was collected.

When providing personal information, employees limit access to only those with a clear business need for the information.

Employees are required to report any breaches of privacy, including the loss, theft of or unauthorized access to personal information, to their manager.

COMPETITION, FAIR DEALINGS AND ANTITRUST

While the company competes aggressively for new business, relationships with business partners are built upon trust and mutual benefits and compliant with competition/antitrust laws.

Employees are required to:

- Communicate the company's products and services in a manner that is fair and accurate, and that discloses all relevant information
- Familiarize themselves with the company's fair competition policies and remain aware of the consequences of any violation of policies or laws governing fair competition
- Consult the company's legal department before engaging in any new practice that may affect fair competition
- Refrain from price fixing, bid rigging, and any other anti-competitive activities
- Use only publicly available information to understand business, customers, competitors, business partners, technology trends, and regulatory proposals and developments
- Advise their manager immediately of possible violations of fair competition practices

BRIBERY AND FACILITATION PAYMENTS

The company will not attempt to influence the judgment or behavior of a person in a position of trust by paying a bribe or kickback. This applies to persons in government and in private business. Acacia Energy Group expects its employees to fully comply with the requirements of the Foreign Corrupt Practices Act (FCPA) for the operations based in the United States as well as the similar regulations in the other countries in which we operate.

The company does not permit facilitation (or “grease”) payments to government officials or private business in order to secure or speed up routine actions.

Employees are required to:

- Select third parties carefully and monitor them continuously to ensure they comply with the company’s anti-bribery policies
- Keep accurate books and records at all times and monitor that funds are not being used for bribery or facilitation payments
- Refuse any offer or request for an unlawful payment and report the incident to the company’s ethics and compliance officer

GIFTS AND ENTERTAINMENT

While gifts and entertainment among business associates can be appropriate ways to strengthen ties and build goodwill, they also have the potential to create the perception that business decisions are influenced by them. The company is committed to winning business only on the merits of its products, services and people and complies with all legal requirements for giving and receiving gifts and entertainment.

Employees are required to:

- Use sound judgment and comply with the law, regarding gifts and other benefits
- Never allow gifts, entertainment or other personal benefits to influence decisions or undermine the integrity of business relationships
- Never accept gifts or entertainment that are illegal, immoral or would reflect negatively on the company
- Never accept cash, cash equivalents, stocks or other securities

Employees may accept occasional unsolicited personal gifts of nominal value such as promotional items and may provide the same to customers and business partners.

When in doubt, employees should check with the ethics and compliance officer before giving or receiving anything of value.

POLITICAL CONTRIBUTIONS

The company does not make political contributions.

Employees are free to support any political party or entity on a personal level. However this must be kept separate from company business.

CHARITABLE CONTRIBUTIONS

The company may make charitable contributions to causes and organizations that are not politically affiliated.

Employees should check with the VP of Operations before making any charitable contributions on behalf of the company.

RECORD KEEPING

All documents, databases, voice messages, mobile device messages, computer documents, files and photos are records and considered the proprietary information of Acacia Energy Group.

Employees are required to:

- Maintain these records and protect their integrity for as long as required
- Maintain official record keeping systems to retain and file records required for business, legal, financial, research or archival purposes
- Dispose of your records according to the company's records retention and disposition schedule

Employees should never destroy documents in response to, or in anticipation of, an investigation or audit.

PROTECTION AND PROPER USE OF COMPANY ASSETS

The company requires all employees to protect its assets. All assets should be used for legitimate purposes, efficiently, and for company business only.

Assets include facilities, equipment, computers and information systems, telephones, employee time, confidential and proprietary information, corporate opportunities and company funds.

Suspected incidents of fraud, theft, negligence, and waste should be reported to the VP of Operations.

MONEY LAUNDERING

The company complies with anti-money laundering laws. Money laundering is the process of concealing illicit funds by moving them through legitimate businesses to hide their criminal origin.

Employees must never knowingly facilitate money laundering or terrorist financing, and must take steps to prevent inadvertent use of the company's business activities for these purposes. Employees are required to immediately report any unusual or suspicious activities or transactions such as:

- Attempted payments in cash or from an unusual financing source
- Arrangements that involve the transfer of funds to or from countries or entities not related to the transaction or customer
- Unusually complex deals that don't reflect a real business purpose
- Attempts to evade record-keeping or reporting requirements

Acacia Energy Group will cooperate with all law enforcement agencies to properly investigate any potential infractions against this policy.

INSIDER TRADING

Employees may learn information about the company, associates, clients, business partners or other companies that is not publicly available. It is illegal for any individual to use information obtained in this way for personal gain or to share it with others.

Employees are prohibited from:

- Buying or selling securities based on non-publicly available knowledge gained in the course of business
- Providing information or tips, or encourage another person to buy or sell securities based on inside information

Employees are required to report suspected insider trading immediately to the ethics and compliance department.

HEALTH AND SAFETY

The company conducts business in accordance with applicable health and safety requirements and strives for continuous improvement in its health and safety policies and procedures.

The employees of Acacia Energy Group are our greatest assets. All employees are expected to perform their work in compliance with applicable health and safety laws, regulations, policies and procedures and apply safe work practices at all times in all locations.

Applicable safety and health requirements must be communicated to visitors, customers or contractors at any company location.

Employees are required to immediately report workplace injuries, illnesses or unsafe conditions, including “near-misses.”

ENVIRONMENT

The company is committed to operating in an environmentally responsible manner, from the provision of products and services, to the operation of its offices and facilities, selection of suppliers and other business activities.

The company complies with all applicable environmental laws and regulations as well as self-directed commitments to sustainable practices and environmental protection. Being a good environmental steward is not mutually exclusive from our operations.

INFORMATION TECHNOLOGY

The company expects its employees to help it safeguard all computer equipment and data against intentional malicious acts by individuals inside or outside the company. Cyber-security training is provided to all employees to ensure compliance with computer security policies.

The company safeguards against inappropriate access by individuals or groups untrained in correct company policies or procedures

The company does not use software for which it does not have a license and employees are prohibited from sharing unauthorized software.

INTERNET USE

The company understands that occasional personal use of the Internet during work hours is a reasonable request and allows this, within reason. Employees can ask for clarification from their managers if in doubt.

However, the company does not allow Internet use to support a personal business, political venture, or embarrass the company and its customers.

USE OF SOCIAL MEDIA

Social media provides opportunities to network and create exposure for the company and brand. But there are risks associated with employees' use of it. Employees are accountable for what they post on social media or as comprehensive as a complete list of social media activities that are permitted, encouraged and prohibited.

The company respects the right of employees to use social media for personal and professional purposes.

Employees are responsible for complying with company policies and procedures when communicating on social media. Employees are accountable for any information they publish online.

Employees are required to:

- Reveal their relationship with the company when commenting online on issues related to the company
- Respect the privacy of other employees and refrain from publishing photos of them without their consent
- Ensure any information they post related to the company is accurate
- Comply with the rules of the social media sites they use

Employees must not:

- "Pretext", or pretend to be someone they are not online
- Speak on behalf of the company if they are not expressly authorized to do so
- Share confidential information about the company, its clients, stakeholders or suppliers
- Post comments or pictures that could harm the company's brand, reputation or commercial interests

CORPORATE SOCIAL RESPONSIBILITY

The company understands that corporate social responsibility extends to our entire supply chain. This encompasses not only the products and services supplied but also the human rights, ethics and social practices of our company and its suppliers.

One goal of the corporate social responsibility procurement program is to build partnerships with like-minded organizations by actively seeking out business partners who are the most environmentally and workforce friendly.

Forced Labor

The company and its suppliers shall employ all employees under their own free will with no one being subjected to bonded or forced labor. This policy applies to not only the supplier's business operations but also those of their supplier network with which the company conducts its business.

Child Labor

The company and its suppliers shall not employ any people under the minimum legal working age of the country in which they work.

Responsible Environmental Impact

The company and its suppliers shall produce measurable environmental impact reports and conduct ongoing efforts to reduce environmental pollution while increasing sustainability.

The company encourages and supports involvement in the community that has supported it. This includes supporting local business and talent by, for example, sourcing local products and services, where appropriate, and showcasing the work of local artists in the company's public spaces.

Charitable involvement is important to the company and a charity committee meets once a month to discuss and execute potential and ongoing charitable projects.

CODE OF CONDUCT ACKNOWLEDGEMENT

By certifying to the company code of conduct, you acknowledge that:

- You have read the entire code of conduct and understand your responsibilities related to it.
- You have had the opportunity to ask questions to clarify any unclear aspects of the code.
- You agree to abide by its principles.
- You agree to report to the company any violations of the code.
- You agree to cooperate in any investigations of violations of the code

NOTES

EMPLOYEE NAME:

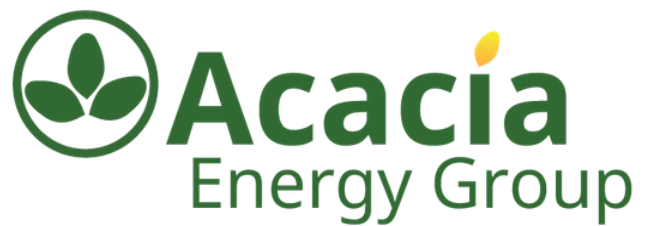
EMPLOYEE SIGNATURE:

DATE:



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