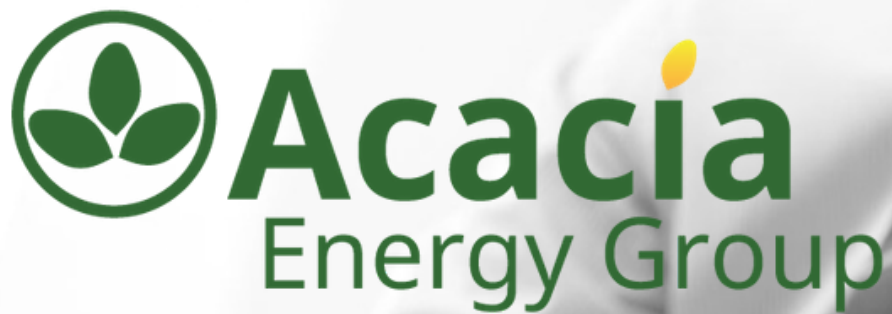


2017

ACACIA ENERGY GROUP
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CORPORATE COMPLIANCE POLICY
EFFECTIVE MAY 1, 2017



CORPORATE COMPLIANCE POLICY

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



Message from the Founder, President & CEO

The global nature of Acacia's business means that our operations are subject to a wide variety of regulations throughout the world. By strictly complying with these standards we can avoid significant legal and financial risks to our company.

Our Corporate Compliance Policy forms the framework for acting in accordance with corporate rules and regulations worldwide. It is based on proven principles that have always governed our business activities: integrity, respect and reputation. Following these rules and principals at all times is essential for maintaining trust and respect of our customers, suppliers, partners and general public.

Corporate compliance is not an abstract concept, but the code of behavior that applies to everyone. Our Corporate Compliance Policy is characterized by a sense of responsibility as well as ethical principles. Acacia will forgo any business that would only be possible by violating the law or company rules.

Let us work together to continue upholding Acacia's great standing. Our principals of integrity, respect and reputation are the vital pillars for our sustained global success.

A handwritten signature in black ink, appearing to read "James W. Head", written in a cursive style.

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

TABLE OF CONTENTS

4	Introduction
5	Fair Competition and Antitrust Laws
10	Anti-corruption and U.S. Foreign Corrupt Practices Act
16	Integrity in Business Dealings
17	Upholding Foreign Trade Laws
20	Insider Trading
21	Transparent Financial Reporting
22	Discrimination and Harassment
22	Infringement
23	Conflicts of Interests
27	Dealing with Authorities
30	Compliance Reporting and Non-retaliation
33	Professional Conduct
34	Protection of Personal Information
35	Adherence to Corporate Compliance Policy
36	Notes

INTRODUCTION

Acacia Energy Group is a reputable company known worldwide. Despite this respectful standing has been earned by Acacia for many years, careless and improper actions of just one employee can damage Acacia's image in a blink of an eye. To prevent this from happening, all employees must be guided in their activities by clear principles, set forth in this Corporate Compliance Policy.

Corporate compliance refers to the lawful and proper conduct of the company's business. Each Acacia's employee is obliged to follow all applicable laws and corporate standards. The Corporate Compliance Policy serves as a foundation for company and employees conduct. The Policy, however, doesn't cover all possible situations or describe all specific caveats of the rules and regulations that must be strictly followed.

Furthermore, the laws in some countries may have more stringent standards than those set in this Policy, in which case the stricter standards apply.

Unlawful and unethical behavior can have far-reaching consequences for the company, including:

- Criminal penalties
- Administrative fines
- Civil and punitive damages
- Seizure of profits
- Exclusion from contracts
- Termination of business relationships
- Harm to Acacia's image
- Negative perceptions by the market

Individual employees who violate the principles of this Corporate Compliance Policy also face serious consequences, such as fines or imprisonment, claims for damages, sanctions under labor law and termination of employment.

Acacia strives to succeed in the competitive marketplace by being innovative, quality-driven, reliable and fair. If the only way to close a deal is by acting in an illegal or unethical way, we will forego the deal. Acacia's employee who declines business in such circumstances will never suffer retaliation as a result.

By thoroughly implementing this Corporate Compliance Policy, we show the public, the authorities, our customers and business partners that compliance is an integral part of Acacia's corporate culture.

Acacia is a global energy and commodities company with multiple production, storage and office locations worldwide. Our employees, therefore, are exposed to a wide variety of standards and ethical principles, some of which are often unfamiliar or unknown to them. What at first sight appears to be a purely local matter may also be a subject to the laws of a foreign jurisdiction. This Corporate Compliance Policy is intended to give Acacia's employees a point of reference in their daily work and help them to avoid violations.

Ignorance is no defense against the potential consequences of breaking the rules. For support, employees can turn to their supervisors, Acacia's legal department and senior management.

FAIR COMPETITION AND ANTITRUST LAWS

Acacia Energy Group does not tolerate any business transaction or activity that violates the antitrust and competition laws of any country in which the company conducts business.

Violations of the antitrust laws of the individual countries and regions in which Acacia does business, including, in particular, U.S. and European antitrust laws, can have dramatic consequences for the company. As mentioned in the introduction, Acacia could face a variety of negative repercussions, including serious fines, lawsuits, and exclusion from public contracts and harm to the company's reputation.

Employees who violate antitrust laws also face severe external repercussions, including possible imprisonment. Internally, Acacia will not show any forgiveness towards employees who disregard antitrust laws. Even if a business matter runs into difficulties through no fault of the employee, resorting to unlawful agreements with competitors is totally not acceptable. Compliance is the only permissible course of action, even in a crisis.

The Effects doctrine of antitrust law is particularly important to note. According to the Effects doctrine, determining the occurrence and ramifications of an antitrust violation does not depend only on the jurisdiction in which the violation occurred. In some cases, causing an adverse effect on competition in another jurisdiction may constitute an antitrust violation.

Antitrust law protects competition in three ways:

- By forbidding collusion among competitors and anticompetitive arrangements among suppliers and customers
- By forbidding the abuse of a dominant market position
- By overseeing the acquisition and sale of companies as well as other business combinations (merger control)

Antitrust violations

The major types of antitrust violations include:

- Price fixing
- Allocating market shares
- Agreements on production capacities
- Allocating geographical markets
- Allocating customers
- Dictating or controlling a customer's resale price

Any kind of concerted actions, informal talks or "gentlemen's agreements" that are intended to restrict competition or may have the effect of doing so are prohibited. Employees must not even give the appearance of being a part of any such conspiracy.

Acting in concert with other bidders when competing for contracts from the private sector or public sector is not only an antitrust violation, it is a criminal act. Please involve the Acacia's legal department when entering into or contemplating any kind of agreement with a competitor, even if the subject matter of the agreement lies outside of the area in which Acacia and the other party compete.

Trade association meetings provide the opportunity to get together with competitors and discuss matters of mutual interest. This is quite legitimate, provided, however, that the limits imposed by antitrust law are respected. Accordingly, employees should normally consult the legal department before participating in such meetings.

Carefulness is called for in the mere handling of market information. Market research is indispensable and, of course, legal as a rule. However, not all information-gathering techniques, such as certain organized market information systems, are suitable for this purpose. Benchmarking with competitors is also permissible in principle. But in all these cases there are certain acknowledged "rules of the game" to ensure that information which is sensitive from an antitrust viewpoint is given in a sufficiently anonymous manner that its origin cannot be identified and it therefore cannot influence current market developments.

For example, Acacia is not allowed to exchange information concerning customer relationships, prices, imminent price changes or the likes with our competitors, nor we are permitted to disclose our own calculations, capacities or plans to competitors.

Finally, keep in mind the provisions of antitrust law when negotiating the terms and conditions of agreements where Acacia acts as a customer or supplier. Clauses that impact resale prices, restrict use or resale, or stipulate exclusive arrangements always require legal review.

Abuse of market power

Dominant market positions are by no means illegal per se if they grow, for example, from company's own achievements. In addition, patents provide legally protected monopolies for certain periods of time. A company is said to dominate a market when it has no substantial competition in that market. The behavior of companies with dominant market positions is subject to particularly strict antitrust controls as a means of compensating for this lack of competition. Dominant market positions must not be abused, that is they must not be exploited in ways that would be unfeasible or at least unrealistic in a true competitive environment.

Companies with a dominant market position may not deliberately undercut competitors' prices with the purpose of driving them out of the market. Nor may they execute agreements with customers that contain contract periods, exclusive arrangements, discount offers or package deals that make it impossible for their competitors to compete for the same customers' business. Companies may not abuse dominant market positions in their relationships with customers either, for example by demanding prices that are not economically justified. Acacia employees must seek legal counsel anytime they suspect that certain steps are being taken or certain terms enforced because of a dominant market position.

Observing merger guidelines

Mergers, acquisitions, joint ventures, and licensing arrangements can rise antitrust and competition issues, as well as trigger certain regulatory reporting obligations (e.g., Hart-Scott-Rodino Antitrust Improvements Act pre-merger notification requirements).

Business divestitures, acquisitions and joint ventures generally require the approval of domestic and foreign antitrust agencies once the volume of the deal reaches a particular threshold. Failure to follow the corresponding registration requirements can result in steep fines and, more particularly, render the deal null and void. In order to

ensure that registration requirements are adequately accounted for during planning, the Acacia's legal department must be involved at an early stage.

Dealing with actual or potential competitors

Acacia employees must decide (with the assistance and/or guidance of the Acacia's senior management, legal department, retained experts and/or consultants, if necessary), independently of competitors, which products are to be procured and/or produced, in what quantities, to whom they will sell, and at what prices, terms and conditions. Actual or potential competitors are not permitted to act in concert, including signaling to one another, or agree among themselves, to fix, set or control any of the aspects just described, except in rare circumstances and with regulatory approval. To avoid an appearance of collusion or improper conduct, employees must never engage in public or private, oral or written contracts, discussions, or agreements with an actual or potential competitor, including for the purpose of "signaling" an actual or potential competitor, about the following matters (unless advised or granted permission to do so by the legal department):

- Pricing policies, discounts, margins, rebates, and other terms and conditions of sale
- Pricing practices or trends of suppliers, wholesalers, distributors, or customers
- Bids, the intent to bid, or bid procedures
- Projected profits, profit margins, market shares, or product concentrations within an identified market
- Costs and projected costs
- Business, marketing and promotional plans, including product launch dates or controls or limitations on advertising initiatives
- Customer or supplier selection, rejection or termination
- Not to sell to or buy from particular individuals or firms (so-called boycotts)
- Current or potential research activities
- Credit terms
- Freight charges or royalties
- Allocating sales territories, customers, customer lists, or a particular customer's business
- Controlling the rate of production or market supply of any product or raw materials essential to the completion of any product
- Controlling or attempting to control or delay the production or market supply of any comparable product, analogue or perceived substitute for an Acacia product with potential competitor(s) (e.g., "pay for delay" or "reverse payment" provisions)

If any party asks Acacia's employee to enter into an illegal or questionable agreement or to share information about Acacia practices, the employee must take the following actions:

- Inform the party that such discussions may be illegal, resulting in potential criminal penalties, including imprisonment and/or fines, for engaging in such conduct, and that you will not discuss this subject
- Immediately leave the meeting, noting your departure in meeting minutes
- Immediately inform your Acacia's supervisor, senior management and the legal department about the incident, and make a detailed report for the file

Dealing with customers and distributors

Companies must ensure their business practices and competitive actions do not give the appearance of an attempt to engage in unfair competition, (e.g., abuse of a dominant position in the marketplace). Accordingly, employees should exercise caution and must consult with the legal department before engaging in any conduct of the type noted below:

- Selling multiple Acacia products together for a discounted rate (i.e., bundling)
- Entering into agreements in which Acacia limits the individuals or companies from whom it will purchase goods or services, or attempting to limit a customer's right to purchase goods and services from others
- Entering into agreements or understandings with distributors about the prices that the reseller will charge its customers
- Discriminating with respect to price, discounts, or allowances among similarly situated and competing customers

In addition, Acacia employees must never:

- Require a customer to buy from Acacia before buying from the customer (i.e., reciprocal dealing)
- Require a customer purchase one Acacia product as a precondition in order to purchase a second Acacia product (i.e., tying)
- Induce customers to terminate, breach, or violate contracts with competitors
- Bribe customers or suppliers in order to help Acacia's business interests or hurt competitors

Other considerations

Acacia employees must assume that the files and documents (including emails) of employees will be produced to, and reviewed by, the antitrust or competition authorities in connection with investigations or claims involving competition or antitrust issues. Accordingly, Acacia's documents (including employees' documents) must not inadvertently raise concerns under antitrust laws or regulations. Therefore, employees should use care in preparing internal and external documents to ensure that they comply with the principles set forth in this Policy.

Please note that it is not Acacia's policy to "dominate" or "control" markets, exclude rivals from access to customers or suppliers, or engage in pricing practices that would harm customers. Accordingly, employees should avoid the use of overly aggressive or colorful language that suggests or gives the appearance of conduct or activity that would be contrary to this Policy or applicable law. Language focusing on the benefits and services offered by Acacia to customers is preferred to language dealing with competitors. Employees are encouraged to consult with the legal department if they have any questions concerning this subject.

ANTI-CORRUPTION AND U.S. FOREIGN CORRUPT PRACTICES ACT

Acacia Energy Group will not tolerate acts or attempts to improperly influence government personnel or private individuals to secure favorable regulatory treatment or improperly advance Acacia's commercial interests. Any Acacia employee who violates the U.S. Foreign Corrupt Practices Act and any foreign law equivalents, and who does not uphold the Acacia's Code of Conduct and associated policies will be subject to disciplinary action, including termination of employment.

Many countries in which Acacia has operations have enacted anti-corruption legislation. For example, the U.S. Foreign Corrupt Practices Act (FCPA) is a U.S. federal statute that, among other things, makes it illegal to make payments to government officials of any country outside of the U.S. for the purpose of, directly or indirectly, obtaining or retaining business. It also requires U.S. companies and their affiliates to keep accurate books and records and to maintain internal accounting controls to ensure transactions are executed in accordance with management's instructions and properly recorded on the company's books.

Anti-corruption legislation in other countries is similar to the FCPA but, in some cases, the requirements of other countries' laws go even further than the requirements of the FCPA. Acacia's employees are required to comply with local requirements. For guidance on specific local laws, employees must consult with Acacia's legal department.

It is Acacia's policy to comply with the FCPA and the laws of other countries that prohibit bribery or corruption. This Policy will assist Acacia's employees in distinguishing between permissible business conduct and illegal behavior.

General principle

Acacia's employees must not offer, promise or give, directly or indirectly, any payment (whether cash or non-cash) or any other advantage or thing of value to any Government Official or any other Third Party as an improper inducement for such person to take any action, or refrain from taking any action, that benefits Acacia businesses. Acacia's employees must also not accept, directly or indirectly, any financial or other advantage from any Government Official or any other Third Party for performing, agreeing to perform, refraining or agreeing to refrain from taking any improper action that benefits Acacia's businesses.

Employees must:

- Maintain good understanding and knowledge of the principles and purposes of the FCPA and similar local laws as they apply to Acacia businesses (consult Acacia legal department for guidance on local laws)
- Abstain from any activities that might violate or give any appearance of intention to violate such laws
- Seek guidance from the Acacia's legal department in any circumstances where doubt exists as to the appropriateness of proposed conduct

Payments to Government Officials and other third parties

Anti-corruption legislation in many countries, including the U.S., specifically prohibits making a payment to a foreign (non-U.S.) Government Official, irrespective of rank, in order to influence that Official's behavior. The term "Government Official" means any person acting in an official capacity on behalf of a government agency, department or instrumentality of another country, including, in some countries, government owned businesses. It also includes any political party or candidate for political office and their representatives. In addition, anti-corruption legislation in certain countries extends the prohibition on improper influencing to non-government officials (i.e., Third Parties).

Acacia's employees must not directly or indirectly, offer, promise to pay or authorize the payment of money or anything of value to a Government Official or other Third Parties for the purposes of:

- Influencing any act or decision of the Government Official or other Third Party
- Inducing a Government Official or other Third Party to act or fail to act in violation of his or her lawful duty
- Securing any improper advantage
- Inducing a Government Official or other Third Party to use his or her influence with a government or instrumentality in order to retain or obtain business

Acacia's employees are also prohibited from offering or paying anything of value to an intermediary (e.g., a distributor or outside consultant) while knowing that the intermediary will channel some or all of the payment to a Government Official or other Third Party for any of the purposes outlined above.

Please note that merely making or authorizing an offer to make payments or give something of value is prohibited. The offer does not need to be accepted, and no payment needs to be made in order for liability to exist under the FCPA and other similar legislation. Note also, that a payment made to obtain special regulatory or other government treatment can also be construed as a payment to obtain or retain business.

“Facilitating” or “Expediting” payments

Occasionally, Acacia's employees may be asked by low-level officials or other Government Officials for a payment to persuade them to perform their administrative, non-discretionary functions (e.g., processing of routine paperwork or applications or clearance of goods through customs). These are often referred to as “facilitating” or “expediting” payments. The FCPA has a very narrow legal exemption related to facilitating or expediting payments to secure routine governmental action, but the laws of many other countries do not permit such payments.

Under Acacia's Policy, employees are prohibited from making facilitating or expediting payments. If there is a threat that a Government Official is paralyzing Acacia's business, employees are required, in advance of taking any action, to contact local Acacia's management and the legal department immediately to discuss the situation and permissible options.

Expenditures for product promotion and related activities

Certain expenditures, such as those required for travel, meals or lodging, for purposes of promoting, demonstrating or explaining products or services or executing or carrying out a contract are normally permitted, provided that the expenditures are reasonable and bona fide and are not made for the purpose of securing an improper advantage or corrupting a Government Official's decision on awarding or continuing business. All such expenditures should be reasonable in amount and consistent with Acacia's policies on expenditures of this kind in other contexts. In no event should they be made if it is believed that making them in any given instance will improperly influence a Third Party, including a Government Official.

Accounting records and internal controls procedures

Bribes are often mischaracterized in companies' books and records. The books and records provisions of the FCPA are designed to prevent bribery from being concealed as legitimate payments, such as commissions or consulting fees. The FCPA requires that Acacia and its affiliates maintain books and records that, in reasonable detail, accurately and fairly reflect corporate transactions. It also requires that Acacia establish a system of internal accounting controls to provide reasonable assurances that transactions are executed in accordance with management's authorization and are properly recorded. Anti-corruption laws in other countries contain similar requirements.

In order to ensure compliance with the FCPA's books and records and internal controls requirements, Acacia's internal audit group will review the adequacy of the design and operating effectiveness (including transaction testing) of the system of internal controls established to ensure that all payments to government agencies or Government Officials are accurate and have been properly authorized, reported, and recorded. A sample of such payments will also be reviewed to assure compliance with the anti-bribery provisions of the FCPA.

Sanctions for violating anti-corruption laws

The sanctions for violating anti-corruption legislation including the FCPA are severe. Sanctions may be applied not only to Acacia, but also to Acacia's managers and employees. Depending upon the offense, fines can be quite severe, and, in the case of an individual, a violation may lead to imprisonment for up to ten years.

Regardless of whether sanctions are imposed, a violation of anti-corruption legislation could seriously damage Acacia's reputation and image, which are among our most important assets.

To ensure compliance with the FCPA and similar legislation, employees should:

- Consult with supervisor or the legal department if you have the slightest doubt about the propriety of a payment or the giving of a gift or gratuity. Ask questions if the circumstances are at all unusual or unfamiliar
- Be sure that all employees who have the opportunity to deal with Government Officials, or have the authority to make payments to Third Parties, are aware of this Policy, understand it, have received training and agree to follow it
- Watch for "red flags", (i.e., situations which don't "smell right,") such as a payment, discount, or commission that is larger than is standard for the deal and when you are less than confident that no illegal payments will be made
- Make sure all agreements are in writing and that services are properly described. If you are suspicious of the activities of the other party, consult your supervisor or the legal department
- Conduct Acacia's business in compliance with the laws of all countries in which the company does business
- Comply with generally accepted accounting principles and established internal accounting controls and procedures at all times
- Ensure all Acacia records reasonably, accurately and fairly reflect the transactions of Acacia and the disposition of its assets
- Ensure when considering engaging a Third Party that due diligence into its business reputation, qualifications, and associations with non-U.S. Government Officials is performed in accordance with any applicable Acacia procedures
- Consult with the Acacia's legal department or local management if there is a concern a Third Party engaged by Acacia may be acting in violation of this Policy

To ensure compliance with the FCPA and similar legislation, employees must not:

- Establish any undisclosed, secret, or unrecorded funds or assets of Acacia
- Make any false, inflated or artificial entries in the Acacia's books and records for any reason whatsoever
- Use Acacia's funds or assets for any unlawful, improper, or unethical purpose
- Falsify any accounting records or documents relating to any transaction in any way that may obscure or disguise the true nature of the transaction or activity
- Lie to auditors
- Make or approve payment on behalf of Acacia without adequate supporting documentation or with the intention or understanding that any part of such payment is to be used for any purpose other than that described by the documents supporting the payment

- Become involved in any arrangement or activity that results in any of the previously stated prohibited acts or may lead to a violation of the FCPA or other similar legislation

This Policy is not intended to make Acacia's employees experts on the requirements of the FCPA and similar legislation in other countries. Rather, it is designed to help employees recognize situations and payments that might raise legal issues under anti-corruption laws. It is important that each employee with responsibilities that might give rise to potential liabilities under the FCPA and/or other similar legislation follows the guidelines contained in this Policy and works closely with the legal department to avoid even the appearance of a violation.

Exceptions and possible violations

Contact the Acacia's legal department, senior or local management for:

- Any exceptions to this Policy
- Possible violations of this Policy
- If you have any questions or comments concerning this Policy
- If you are aware of a situation that you believe may be unlawful or unethical

Employee's responsibility for compliance

Every Acacia's employee worldwide is required to follow

- Acacia's Code of Conduct
- Laws and regulations applicable in the relevant jurisdictions
- Acacia's governance documents applicable to employee, including without limitation, those relating to this Policy

Employees should apply due diligence in preventing violations of such laws, regulations, and governance documents, and must refer to the governance documents in effect for the geographic area in which they work, or for which they are responsible, or request guidance from their manager or compliance representative with responsibility for that geographic area.

Acacia expects its managers to

- Be familiar with (or take appropriate steps to become familiar with) the laws, regulations, and Acacia's governance documents applicable to the activities they manage or supervise
- Ensure their direct reports have appropriate training on compliance requirements to perform their job functions
- Supervise direct reports with respect to compliance requirements and activities

If Acacia determines that any employee has violated this Policy, related standards, procedures or controls, applicable laws or regulations, or any governance documents, appropriate disciplinary measures will be taken, up to and including immediate termination of employment, to the extent permitted by applicable laws. The following is a non-inclusive list of possible disciplinary measures to which employees may be subject (subject to applicable law): oral or written warning, suspension, removal from job duties/responsibilities, demotion, reduction in compensation, and/or termination of employment.

Subject to applicable laws, Acacia reserves the right to take whatever disciplinary or other measure(s) it determines in its sole discretion to be appropriate in any particular situation, including disclosure of the wrongdoing to governmental authorities. Nothing in this Policy changes the at-will nature of employment at Acacia, its affiliates or subsidiaries, where applicable. Acacia may also terminate the services or work engagement of non-employee for violation of this Policy.

INTEGRITY IN BUSINESS DEALINGS

Corruption is contrary to fair competition and harms company's economic standing and reputation. In addition, many countries treat corruption as a crime, regardless of whether the actual act takes place in their jurisdiction or in another country. Thus, Acacia employees are strictly prohibited from attempting to unlawfully influence business partners, whether through favors, gifts or the granting of other advantages, anywhere in the world. This rule particularly applies to dealings with individuals acting on behalf of government agencies or other public institutions.

Acacia will not entertain any business deals that involve breaking the law or violating company rules relating to the granting or acceptance of favors, knowing the fact that some business may be lost as a result. No amount of potential additional revenues or earnings can justify illegal business practices. This applies throughout the Acacia Energy Group without any exception. No employee, regardless of the country in which he or she works, is entitled to violate the law or Acacia's policy.

Any gift, even if given indirectly (for example to friends, relatives or associations), is considered as an advantage. Examples include: cash, invitations to events, airline tickets, hotel stays, employment for friends or relatives, special personal favors and even the payment for expensive food and drink. The granting or acceptance of gifts must take place in compliance with the law as well as Acacia's internal compliance guidelines.

Acacia employees are not allowed, under any circumstances, to demand personal gifts. Likewise, they cannot offer or grant gifts of cash, or gifts equivalent to cash, to any public official.

In dealings with business partners, employees must avoid granting or accepting any gifts in connection with the negotiation, award or performance of a contract, and any gift granted or accepted must be of a size deemed unobjectionable under the laws and applicable to both the giver and the recipient. In case of a doubt, please contact the Acacia's legal department.

UPHOLDING FOREIGN TRADE LAWS

Acacia Energy Group is committed to upholding all domestic and international foreign trade laws. We support the efforts of the international community to prevent the manufacture and proliferation of chemical, biological and nuclear weapons and their delivery mechanisms as well as to combat international terrorism.

All employees are required to observe the restrictions and bans on domestic and international trade in listed goods, technologies and services. Employees must also respect the trade bans and restrictions that are part of international embargos and international efforts to combat terrorism, including those which may affect payments and other movements of capital as well as those involving the re-export controls of the United States and other countries. Employees should forgo any business where doubt exists as to the legality of a product's use or distribution.

Export control laws

- It is important to ensure that Acacia's global supply chain is not interrupted, and movement of goods complies with international trade regulations specific to each country's jurisdiction
- In the United States, for example, there are laws that govern, and in many cases restrict, the final destination of the sale and/or shipment of goods to ensure that certain individuals, businesses, or entities, including individuals and organizations associated with known terrorist activities, do not receive items made by or from a U.S. company.

- In addition, Acacia must adhere to regulations around trade embargoes that may dictate partial or complete prohibition of commerce and trade with a particular country. The Directorate of Defense Trade Controls and the U.S. Bureau of Industry and Security in cooperation with the Office of Foreign Assets Control, are responsible for managing the flow and sale of U.S. software, goods, and technology from the U.S. All subsidiaries of the U.S. companies are bound to comply with the U.S. export control laws, and violations can result in civil and criminal penalties for Acacia and employees as well as suspension or denial of export privileges and debarment from U.S. Government procurement. Countries other than the U.S., such as members of the European Union, also have export control restrictions, and Acacia's employees are required to follow all applicable laws related to exports.
- Anti-boycott regulations require U.S. firms and their subsidiaries to refuse to participate in unsanctioned foreign boycotts of countries friendly to the United States, for example, Israel. Any requests received by Acacia's employees that are discriminatory in nature towards a country or a business, and are made in connection with international transactions, must be refused and reported to the Acacia's senior management and legal department.

Import control laws

- Globally, countries regulate the flow of goods, technology and persons through their borders. In the U.S., for example, Customs and Border Protection (CBP), a division of the U.S. Department of Homeland Security, secures and facilitates trade and travel into the U.S. Many of the regulations enforced by CBP are intended to prevent acts of terrorism and to assure that goods entering the country are legitimate and that appropriate duties and fees are paid. Wherever Acacia Energy Group operates, its employees are required to follow all applicable laws related to imports. Violations of import control laws may result in importations, including hand-carries, being rejected or seized, and civil and criminal penalties imposed on Acacia and its employees.
- Acacia products are regulated by the U.S. government agencies having jurisdiction over petroleum products and commodities imports. Similar agencies may exist globally, and Acacia is also subject to adherence to other government agency regulations when applicable outside the U.S. Generally, these laws are in addition to, and not in lieu of, regulations referenced above.

General guidelines for compliance with export and import laws

Acacia employees are advised to consult Acacia's legal department for guidance on export and import compliance in advance of a planned import or export transaction. Some transactions may be prohibited or restricted and require securing permits or licenses prior to the transaction. When appropriate, Acacia's legal department will liaise with other key stakeholders and functions for cross-functional perspective and advice.

Acacia employees must comply with export and import controls and requirements when engaging in any of the following activities (which is a non-inclusive list):

- Shipment or movement of goods (including hand-carries) across international borders whether between Acacia's locations or third parties on Acacia's behalf, including contract manufacturers, logistics service providers and other business partners
- Creation of international shipping documentation such as a Customs/Commercial invoice, statement of Origin or shipping waybill

Acacia employees are required to follow all procedures that Acacia's legal department has established to ensure export and import compliance, which include:

- Providing accurate and complete information on imported goods and exported goods where such information is required
- Valuing goods in alignment with applicable regulations and Acacia's policies
- Marking goods with the appropriate country of origin where required to provide such information. Country of Origin regulations are complex and are determined by each destination country. Employees should contact Acacia's legal department for guidance on country of origin marking when it is not known
- Maintaining relevant records in accordance with the regulations, typically five years
- Employees should contact Acacia's legal department if they have any questions about international transfer of goods

Acacia employees are prohibited from making payments or offering anything of value to Government Officials (as defined in this Policy, Section "Anti-corruption and U.S. Foreign Corrupt Practices Act"), directly or indirectly (e.g., via third parties), in order to influence those officials' behavior in relation to import or export shipments, clearances, licenses, permits, certificates or statements. In the event there is a threat that Acacia's business is being paralyzed by a Government Official, employees are required, before taking any action, to contact local Acacia's management and the legal department immediately to discuss the situation and permissible options.

INSIDER TRADING

Acacia's policy against insider trading applies to Acacia employees, consultants, contract workers and temporary staff, as well as to members of their families and households. Every Acacia's employee is required by law to maintain secrecy with respect to any inside and non-public information about the company and its counterparts.

Using inside information for personal gain or the gain of others is prohibited. Common examples of inside information include knowledge about the intended divestiture of parts of the company, the acquisition of outside companies, the formation of joint ventures, new findings regarding key products, or specific information about business developments that has not yet been made public.

Insider trading laws prohibit trading in securities on the basis of non-public information or sharing such information with third parties. In other words, insiders may not divulge non-public information to third parties, whether inside or outside of Acacia, except on a need-to-know basis and with reasonable measures in place to ensure that the information remains confidential and cannot be misappropriated by third parties.

The insider trading laws of the United States (U.S.) prohibit buying or selling a company's securities while aware of material, non-public information about that company. It may also violate U.S. securities laws to disclose material, non-public information (deliberately or unintentionally) to another person (including your spouse, parent, child or sibling) if that person either buys or sells securities while aware of the information disclosed, or passes that information to a third party who does. Providing advice regarding a company's stock while aware of material, non-public information regarding that company may also violate civil and criminal U.S. securities laws. If you make such a disclosure or provide such advice, you may be subject to damages, civil suits and criminal prosecution, regardless of whether you receive financial gain from the transaction.

It is Acacia's policy to comply with the U.S. insider trading laws and regulations. This Policy sets forth the requirements for employees' compliance with insider trading laws and regulations. Please note that many countries other than the U.S. have similar laws regarding insider trading. Even if the activities prohibited in this Policy are not illegal in the country where an employee is located, Acacia's requirements for insider trading compliance apply to all employees regardless of location. Acacia employees are responsible for assuring that their family members (including spouses, minor children, or any other family members living in the same household) comply with the provisions of this Policy as if they were Acacia's employees.

General prohibition on insider trading

It is against Acacia's Policy for employees:

- To purchase or sell any type of security while aware of material, non-public information relating to the issuer of the security
- To directly or indirectly provide ("tip") material, non-public information about any company to anyone who may trade while aware of such information

Thus, it is against this Policy for employees to pass along material, non-public information about any company, or to recommend buying or selling securities while aware of material, non-public information about any company to others, including family members, others living in their household, friends or casual acquaintances.

TRANSPARENT FINANCIAL REPORTING

An internal control system must provide for the proper documentation of an entity's key business processes and the establishment of controls to ensure that all transaction details relevant for accounting purposes are fully and correctly captured.

Files must therefore be complete, orderly and readily understandable. All records and files must be kept in such a way as to permit delegation to a colleague at any time. Employees should retain records for as long as statutory or internal provisions require, and must never destroy documents relevant to threatened or pending audit or official judicial proceedings.

Any item of correspondence, whether a letter, fax, email or even verbal comment, must be communicated in observance of proper etiquette and be clear and consistent in content so that it can be presented or surrendered to a third party (such as an investigative body, court of law, other governmental institutions or certified public accountants). Comments attributable to the company that are inappropriate, unclear, and incomplete or made in haste may be extremely damaging because they can be misinterpreted, misused or taken out of context. Employees must be courteous and efficient when using email and other forms of online communication. The volume of emails should be kept to the necessary minimum.

The following guidelines are essential for ensuring accurate and timely financial reporting:

- All items with accounting relevance must be supported by complete and correct documentation and entered into the books accordingly

- The company's accounting records and related documents must fully and accurately reflect all business transactions and give a true and fair view of the company's assets
- Every employee tasked with presenting information that is relevant to Acacia's financial reporting and destined for public disclosure is responsible for ensuring that this information is complete and accurate
- Employees must promptly notify their supervisors or the Acacia's legal department if ever they have a reason to doubt whether material business transactions have been correctly presented in the financial reporting

DISCRIMINATION AND HARASSMENT

No person is to be unfairly treated, disadvantaged, favored, harassed or ostracized because of race or ethnicity, color, nationality, religion, ideology, gender, age, physical characteristics, appearance or sexual orientation or other protected classes in the particular country.

Everyone has the right to be protected against discrimination and harassment of any kind whether within Acacia Energy Group or in their contacts with outside parties.

Acacia expects its employees to be friendly, objective, fair and respectful in their dealings with colleagues and third parties, including customers, suppliers and officials. By doing so, they also make an active contribution toward protecting Acacia's good reputation.

The responsibility for maintaining these standards of conduct rests with each and every employee, not just with supervisors. A violation of these standards will not be tolerated. Any conflicts should be referred to the employee's supervisor, human resources, legal department, who, if necessary, will take the required action to appropriately address any wrongdoing and to prevent a repeat violation.

INFRINGEMENT

The trade secrets and business intelligence are extremely valuable business assets for Acacia Energy Group. Trade secrets, business data and other intellectual property are the "reward" for Acacia's endeavors and expenditures in the areas of international trade development.

They are extremely important to Acacia's future, as is our brand, the value of which may in some cases be substantial and the result of effort and marketing expenditures. We must therefore take utmost care to ensure that Acacia's rights in the intellectual property we create enjoy full legal protection.

Trade secrets and market knowledge should not be passed on to third parties, much less made public, without the proper legal protection. The same care must be taken with information shared over the company's intranet.

No employee may create or dispose of Acacia's intellectual property or execute an agreement or otherwise exercise discretionary authority over such property without the express written consent of the Acacia's senior management and legal department.

Care should be taken to avoid any unintentional transfer of intellectual property through the negligent handling of company information in public, such as working with laptop computers in full view of others or making casual comments in public or in presentations. Business data must be protected against unauthorized access by third parties. No employee should make any copies of Acacia's business papers or data files other than for work-related purposes.

Acacia employees must respect the valid, legally recognized property rights of third parties and may not use them without permission.

CONFLICTS OF INTERESTS

Acacia Energy Group's employees are responsible for avoiding situations in which personal interests, outside activities, financial interests or relationships conflict or even appear to conflict with the company's interests. All employees must separate their own personal interests from those of Acacia Energy Group.

During working hours, in particular, employees have a primary duty to promote Acacia's corporate interests. Conflicts of interest, or even the mere appearance of such conflicts, must be avoided.

Definition of conflict of interests

A conflict of interest exists any time an individual subject to this Policy permits the prospect of personal gain to improperly influence the manner in which he or she conducts Acacia's business.

Examples of such conflicts include (but are not limited to):

- Misuse of an employee's position with Acacia for his or her personal gain
- Outside employment with a competitor of Acacia or supplier to Acacia
- Referral of Acacia's business to a firm controlled by other Acacia's employee, the employee's family, or a person with whom the employee has a close, personal relationship
- Soliciting any gifts or gratuities from customers or suppliers of Acacia
- Accepting any gifts or gratuities from any person or company doing or seeking to do business with Acacia, unless such acceptance is allowed under the cultural courtesy gifts exception set forth in this Policy

A comprehensive list of typical areas of conflict is given below.

- Personnel decisions: An employee's personal individual interests or relationships must not influence business decisions.
- Business relationships with third parties: Business relationships with third parties must be formed on the basis of objective criteria (for example, price, quality, reliability, technological standard, product suitability, existence of a long-standing and trouble-free business relationship). The execution of a contract or continuation or termination of a business relationship with a third party must not be influenced by personal relationships, personal interests or tangible or intangible personal advantages. The supply of products or provision of services to Acacia by companies that are controlled by Acacia employees or their close relatives must be subject to close scrutiny.
- Contracting of Acacia's suppliers or other business partners for personal purposes: If an employee wishes to place a personal supply or other business contract with a person or entity that also has a pre-existing business relationship with Acacia and that employee is in a position to directly or indirectly influence Acacia's business relationship with the supplier or business partner in question, the employee must notify his or her supervisor in advance and receive the supervisor's permission before placing the contract.
- Using services of Acacia employees for personal purposes: Supervisors and managers may not abuse their authority by availing themselves of the services of Acacia employees for personal purposes.
- Use of Acacia property (for example, equipment, goods, vehicles, office supplies, documents, files, data storage media): Employees may not use items belonging to Acacia for their own personal purposes or remove such items from company premises without their supervisor's express consent. Likewise, no data, programs or company papers may be copied or removed from the company's premises without approval.

- Use of the Internet and email system: Acacia provides Internet access and electronic communications for business purposes. The occasional, only marginal use of the business Internet connection for private purposes during individual breaks is permitted. This permission may be revoked at any time. Private Internet use must be strictly limited in duration and must not interfere with an employee's duties. Use of the email system provided by Acacia is for business purposes only. The email system must not be used for private purposes.
- Outside employment: Any employee intending to accept employment with an outside company – even on a freelance basis – or to set up his or her own business must inform his or her supervisor. This applies particularly to positions with companies that already do business or compete with Acacia or might reasonably do so in the future.
- Personal involvement in political parties or other social or political institutions: Acacia welcomes its employees' voluntary involvement in such organizations as long as it does not interfere with the performance of their duties at Acacia.
- Public expression of personal opinions by employees: When expressing their personal opinions in public, Acacia employees must not give the impression that these opinions represent the views of the company.

Basic prohibition

Acacia's employees are prohibited from engaging in any activity or practice, which could be perceived, as creating a conflict with Acacia's interests.

Guidance for avoiding conflicts of interest

In order to avoid actual conflicts, and minimize the possibility or appearance of conflicts of interest, Acacia employees must:

- Deal with all suppliers, customers and all other persons doing business with Acacia objectively, professionally and fairly, and by following Acacia's Global Strategic Sourcing guidance and policies, where applicable
- Not seek nor accept, directly or indirectly, any payments, fees, loans or services from any person or firm as a condition of, or result of, their doing business with Acacia
- Not accept gifts from any person or firm doing or seeking to do business with Acacia. Such gifts must be returned with a note of explanation. When return is not reasonably practical, employees must dispose of the gift in a manner that does not create personal gain. Employees in doubt about whether accepting a particular gift would violate this Policy are required to seek the guidance of the Acacia's legal department before accepting it

- Not allow themselves to be placed in a position where a conflict of personal interest and Acacia's interest exists or appears to exist. Employees must use care to avoid even the appearance of impropriety, where a reasonable person would question whether he or she was influenced
- Not do business on behalf of Acacia with a relative or a person with whom such employee has a close, personal relationship, including negotiating with, engaging or hiring such individuals, or being involved in decisions related to engaging or hiring such individuals. If a relative or a person with whom a employee has a close, personal relationship is negotiating with Acacia to do business, then the employee must disclose the relationship to his or her supervisor or others involved in the negotiations
- Not hold any financial interest in any firm or corporation which is a competitor of Acacia, or which does or seeks to do business with Acacia, if such interest may influence any decision that employees might make in the performance of their Acacia responsibilities. Employees do not have to sell stock that they own (at the time an actual or potential conflict of interest arises) in the above companies or in any firm or corporation which is a competitor of, or which does or seeks to do business with, Acacia, unless such interest may influence any decision that employees might make in the performance of their Acacia responsibilities. Employees must also comply with Acacia's Insider Trading Policy provisions
- Not accept money for attending a conference or meeting. If attendance benefits Acacia, as determined by the employee's manager, the employee may accept a waiver or reduction in registration or event fees and incidental meals generally offered to attendees by a third party hosting the conference or meeting. All other travel and related expenses for attending the conference or meeting should be absorbed by Acacia pursuant to the Acacia's Global Travel Policy.

Other employment or business activities

Acacia staff members may not engage in any employment or business activity, including serving on the board of directors of any for-profit company, without the express written consent of the Acacia's President & CEO. Acacia staff and other employees may serve on boards of not-for profit organizations, as a community service, subject to the provisions of this Policy.

DEALING WITH AUTHORITIES

Acacia Energy Group is always cooperative in its dealings with all government authorities and agencies while at the same time defending its own interests and rights. All employees responsible for collecting Acacia's information and communicating it to government and regulatory authorities, or for other public announcements should communicate such information completely, openly, correctly, timely and understandably.

The Acacia's legal department must be notified immediately when any authority, such as the police or public prosecutor's office, contacts employees whose job it is to investigate possible legal violations or prosecute violators. In particular, information or documents should be provided to authorities only after consulting with the Acacia's senior management and legal department.

As a global organization, Acacia Energy Group must comply with applicable laws and regulations against the improper influence or corruption of Government Officials in every country in which it does business. These laws and regulations govern interactions between Government Officials and employees (collectively, "government personnel") and Acacia's employees, and include laws that regulate the provision of gifts and other items of value to government personnel, lobbying, and other political activities. The laws and regulations in the United States (U.S.) and other countries, relevant to Acacia's commercial activities, including those relating to interactions with government personnel, go beyond those for companies outside energy and commodities industries.

For example:

- The U.S. and most other countries have specific laws and regulations for energy industry and have given regulatory oversight responsibility to one or more governmental agencies
- The energy and petroleum production companies in many countries are owned and operated by the government, and people employed in these industries are government employees. Acacia employees must be particularly sensitive to this issue because a country's government is often both the regulator of Acacia's products and a customer
- Practices generally accepted in the U.S. commercial business environment may not be lawful or appropriate in interactions with government agencies or personnel (whether in the U.S. or other countries)

It is Acacia's policy to comply with all applicable laws and regulations governing interactions with government personnel. This provision sets forth the requirements for interactions with governments and government personnel, including activities involving gifts to government personnel, lobbying and advocacy activities, political contributions and other activities involving elections of government officials, and government procurement activities.

General prohibition on improper influencing of Government personnel

Acacia's employees must comply with all applicable laws and regulations with respect to interactions with governments and government personnel and avoid interactions or situations that could be expected to result in reputational harm to Acacia. Under no circumstances will Acacia employees attempt to improperly influence government personnel or give government personnel any form of payment or gift in order to improperly advance Acacia's commercial interests with the government. In particular, employees are prohibited from making, offering, or promising any payment, gift, service, or anything of value (directly or indirectly) that is intended to improperly influence any government personnel's actions. This includes obtaining restricted information from the government or securing favorable regulatory treatment.

Gifts to Government personnel

A "gift" generally includes anything with monetary value and includes, but is not limited to, meals, entertainment, travel-related expenses, goods, services, and discounts. All gifts from Acacia employees to any government personnel (in the U.S. and other countries) must comply with applicable laws and regulations, including any government ethics rules. This applies even if Acacia's employee pays for the gift with his or her own funds and even where Acacia is not legally responsible for violations of the applicable laws or regulations.

In the U.S. only, Acacia's senior management and other executive and legal personnel who routinely interact with state and local government personnel (e.g., Corporate Account Managers) may provide gifts to government personnel. All gifts provided to government personnel in the U.S. must comply with the U.S. Government Affairs Standard Operating Procedure for Gifts to Government Employees.

Acacia's employees outside the U.S. must comply with the local country laws and regulations on gifts to government personnel. Questions about the appropriateness of giving gifts to government personnel must be reviewed with the Acacia's legal department.

Anti-corruption compliance

In addition to the legislation pertaining to domestic bribery or corruption, the U.S. and many other countries have laws and regulations specifically prohibiting improper payments to foreign governmental personnel. See the “Anti-Corruption and U.S. Foreign Corrupt Practices Act” section of this Acacia’s Corporate Compliance Policy for more detail and consult with the Acacia’s legal department for further guidance in this area.

Government procurement

Acacia employees who are involved in government procurement activities (i.e., tender arrangements for the supply of Acacia products) must also be aware of the laws and regulations in that area.

Below is a non-inclusive list of examples of unacceptable practices in connection with government procurement:

- Offering employment to procurement or regulatory personnel
- Discussing with procurement or regulatory personnel the possibility of their employment with Acacia
- Offering business opportunities to procurement or regulatory personnel
- Discussing business opportunities with procurement or regulatory personnel
- Soliciting or obtaining proprietary or source selection information
- Offering or providing gratuities or accepting “kick-backs” in connection with procurement

Any conduct that constitutes an attempt to improperly influence government personnel is a violation of this Policy.

Lobbying and political activities

In the U.S., there are local, state, and federal laws that regulate lobbying and political activities by and on behalf of companies. Countries outside of the U.S. may also have laws and regulations that govern these types of activities. It is Acacia’s policy to comply with these laws and regulations.

In the U.S., all lobbying activities and corporate political activities must comply with the U.S. Government Affairs Standard Operating Procedure for Lobbying Activities and U.S. Standard Operating Procedure for Use of Corporate Resources for Political Activities. Acacia employees outside of the U.S. must consult the Acacia’s legal department before engaging in lobbying or political activities or using corporate resources for political activities.

In the U.S., Acacia employees must observe the following guidelines:

- Employees that engage in or are otherwise involved in lobbying government entities or government personnel on Acacia's behalf must comply with all applicable laws and regulations at every level of government. Often these laws and regulations include registration in advance of any lobbying activity and certain reporting requirements
- Except as provided in this paragraph, corporate contributions and related expenditures provided for federal, and some state and local, elections are illegal. No corporate state political contributions may be made unless such contributions are approved in advance by Acacia's legal department or senior management. No corporate political contributions as allowable under the Supreme Court decision in *Citizens United vs. FEC* may be made unless such contributions are approved in advance by Acacia's legal department or senior management
- No contribution or expenditure may be made on behalf of a candidate for public office at any level of national or local government if that contribution or expenditure is made as part of any direct or implied quid pro quo with the candidate.
- The governance documents related to Acacia employees' involvement in political activities do not restrict the ability of employees to engage in personal lobbying on their own time for matters unrelated to Acacia and not done on behalf of Acacia provided that no Acacia funds, resources, or facilities are used to support such activity.
- All grants and other funding provided to government personnel and entities on Acacia's behalf must be approved in advance by the Acacia's senior management and legal department.

COMPLIANCE REPORTING AND NON-RETALIATION

A culture of corporate compliance is best achieved in an environment that promotes open communication, including open and candid discussion of concerns about compliance with applicable laws, regulations, and Acacia policy. All managers are responsible for creating and maintaining a work environment that encourages:

- Asking questions about compliance with legal and regulatory requirements, the Acacia Code of Conduct and other Acacia policies and governance documents
- Reporting of concerns regarding business conduct

It is Acacia's policy to provide an effective process for employees to express concerns or report potential violations regarding Acacia business conduct, legal and regulatory compliance (including potential misconduct by other employees) without retaliation or intimidation, in accordance with applicable laws and regulations, and to require the reporting of any such concerns.

Asking questions about compliance requirements

Acacia employees are encouraged to ask questions about Acacia's compliance policies, procedures and practices and are expected to ask questions if they are unsure whether an action, activity, or decision is consistent with law, regulation, Acacia policy or other governance document, or good business ethics in line with the Acacia Code of Conduct.

To ask compliance questions, employees may consult (in no particular order):

- **Manager:** In most instances, the employee's immediate manager can answer questions about Acacia's compliance policies, procedures, or practices and help resolve issues in the most timely and efficient manner
- **Compliance representatives:** Acacia has regional and local compliance representatives who are available to provide assistance to employees, including answering compliance questions
- **Human Resources department:** Acacia's HR Department can answer many questions, including questions about Acacia's employment, personnel, and general business conduct policies and procedures
- **Legal department:** Acacia's attorneys are available to answer questions relating to legal and regulatory matters
- **Senior management:** Acacia's senior management and leadership team is knowledgeable about compliance policies and procedures, and is available to answer many questions
- **Telephone hotline:** Employees may ask questions via Business Conduct Telephone Hotline

Appropriate matters for reporting

Generally, appropriate matters for reporting include good-faith concerns regarding compliance issues or misconduct, such as:

- Violations of law or regulation (whether in the United States or elsewhere)
- Violations of the Code of Conduct, Acacia policies or other governance documents, or standards of business conduct
- Violations of policies regarding financial disclosures, accounting, accounting controls, or auditing matters
- Any other serious wrongdoing or unethical conduct within Acacia, including but not limited to, conduct that is inconsistent with the Acacia's values

Prohibition against retaliation

In accordance with applicable laws and regulations, Acacia's policy prohibits any form of retaliation or intimidation against employees for:

- Reporting a compliance concern in good faith
- Objecting to conduct that may constitute a compliance violation
- For good faith participation in any investigation or other proceeding related to such a report, even if Acacia ultimately concludes that there was no violation

Acacia staff members who engage in retaliation or intimidation in violation of this Policy will be subject to disciplinary action, up to and including termination, to the extent permitted by local laws. Any person who retaliates against another person for reporting actual or potential violations of law or regulation also may be subject to criminal and civil liability under U.S. federal and state laws and the laws of other countries.

Cooperating in investigation and litigation

Employees must cooperate with internal investigations undertaken by Acacia and with Acacia's defense or prosecution of litigation.

- Employees must follow all directions provided when contacted to participate in an internal investigation. Requirements include employees making themselves available to internal investigators immediately upon request, being fully forthcoming and truthful with investigators, and providing complete and accurate information (including tangible items such as documents, recordings, and the like)
- Employees must cooperate fully with Acacia and its outside counsel in defending or prosecuting litigation on behalf of Acacia by completely and truthfully responding to company requests for information and documents. If employees provide testimony in litigation matters, such testimony must be complete and truthful

When employees suspect corruption or the intentional mishandling of company property or finances, for example, embezzlement, fraud, breach of trust or the offering or acceptance of bribes, they should report the matter without delay directly to the Acacia's senior management and legal department.

Promptly reporting this kind of information is likely to save the company from suffering additional, more serious harm or at least mitigate the damage. For this reason employees should direct this kind of information to the individuals and departments mentioned above, because they are most capable of taking the necessary legal steps.

PROFESSIONAL CONDUCT

Ethical business conduct, professional behavior, adherence to acceptable business principles, personal integrity and compliance with applicable laws and regulations are expected to be consistently demonstrated at Acacia Energy Group.

Acacia employees should consistently demonstrate ethical business conduct, professional behavior, adherence to acceptable business principles, personal integrity and compliance with applicable laws and regulations.

It is Acacia's policy to comply with all applicable laws and regulations relating to workplace conduct. This Policy sets forth requirements for appropriate conduct in the workplace and compliance with applicable standards of professionalism. This Policy is not intended to describe every law, regulation, or Acacia policy that may apply to employees. Ultimately, the conduct of employees will be judged by whether such conduct complies with applicable laws, regulations, and Acacia policy.

General guidelines for professional conduct

The following is a non-inclusive list of types of conduct that are prohibited. Employees must also refer to the Acacia's Code of Conduct for additional guidance.

- Offensive conduct toward customers, government employees, vendors or others
- Failure to adhere to accepted industry standards for specific professions (e.g. attorneys, accountants, consultants, etc.) when functioning as such a professional for Acacia
- Conduct that fails to promote a professional environment
- Discrimination in any form on the basis of any legally-protected attribute, status, or characteristic, including at a minimum, race, color, national origin, ethnicity, gender, gender identity, sexual orientation, religion, age, marital status, disability, and disabled veteran or veteran of war
- Harassment of any kind, including sexual harassment
- Intimidation or retaliation that violates the Compliance Reporting and Non-Retaliation Policies

Compliance with laws and Acacia's policies

Acacia Energy Group requires compliance with Acacia's governance documents, all U.S. federal, state and local laws and regulations, and the laws and regulations of other countries governing employment practices, including laws regulating the hiring, compensation, promotion, transfer, discipline, and termination of any Acacia employee or dealings with Acacia consultants, contract workers and temporary staff.

PROTECTION OF PERSONAL INFORMATION

Acacia Energy group is committed to the lawful stewardship of personal information that is collected, stored and used by the company. We respect personal privacy. Everyone in the company worldwide has a role to play in protecting and securing personal information. Any concerns related to a potential and/or actual breach of personal information are considered to be serious in nature, are thoroughly investigated and, if appropriate, measures are taken, up to and including immediate termination of employment, to the extent permitted by applicable laws. Non-employees may have their services terminated for violating Acacia's Policy and related governance.

At Acacia, we respect personal privacy and everyone at Acacia has a role to play in protecting, securing and appropriately processing personal information that has been entrusted to us.

Acacia, and parties acting on our behalf, process various types of personal Information about customers, suppliers, contractors, employees, and others for a variety of lawful business purposes. The lawful collection and use of such information is important to Acacia's business activities. We are required by applicable privacy and data protection laws to implement appropriate safeguards to protect personal information.

Unlawful or unauthorized collection, use or disclosure of personal information could adversely affect the individuals whose information is compromised, as well as potentially expose Acacia to legal and regulatory risks, financial damage and reputational harm. As privacy and data protection laws continue to multiply and expand around the world, Acacia complies with all such relevant applicable laws and regulations that protect personal information.

General guidelines for protecting and processing personal information

Employees must comply with the following requirements in connection with the processing of personal information:

- All privacy and data protection laws and regulations applicable in the relevant jurisdictions and industry standards
- Acacia's governance documents including Code of Conduct and IT Security Policy, as applicable to international transfers of personal information of individuals residing in Europe and other regulated countries
- Contractual commitments, protocols or notifications (e.g. Acacia website's Privacy Policy)

- Only transfer or provide access to personal information to a third party that has a legitimate Acacia's business need to receive such information and will protect and process such information in a manner consistent with Acacia's IT Security Policy
- Report privacy breach incidents in accordance with Acacia's IT Security Policy
- Implement appropriate security measures to protect personal information against unauthorized and/or improper use, disclosure, access, modification, destruction, alteration or storage in accordance with Acacia's IT Security Policy
- Retain or delete personal information in accordance with Acacia's IT Security Policy

ADHERENCE TO CORPORATE COMPLIANCE POLICY

All Acacia employees must adhere to this Corporate Compliance Policy. It is intended to protect both the company and its employees.

This policy defines the framework within which Acacia employees can act with confidence and directly benefits them by, among other things, safeguarding the employees from discrimination and establishing rules for occupational safety. Its observance therefore is in the best interest of employees both as individuals and as important contributors to Acacia's success as a whole.

Every employee is called upon to review his or her own behavior in light of the standards set forth in this Corporate Compliance Policy and to ensure that these standards are observed. Compliance is factored into each employee's performance review as a matter of course.

Employees should bear in mind that there are specific laws and internal guidelines that address in greater detail the topics discussed in this Policy. Employees are required to familiarize themselves with the applicable laws and internal rules governing their areas of responsibility and to follow these laws and rules in their daily work. Any ambiguities should be clarified. The company provides its employees with access to all the necessary information resources and counsel to prevent violations of the law or company regulations. The provisions of this Corporate Compliance Policy take precedence over any conflicting instructions given by a supervisor.

Every supervisor must organize his or her area of responsibility so as to ensure adherence to this Corporate Compliance Policy and applicable law. In particular, supervisors must communicate the rules applicable in their areas of responsibility, monitor adherence to them and enforce them. Problems must be actively addressed and resolved.

Each supervisor is expected to set an example for his or her area of responsibility by acting with integrity and thereby ensure that compliance is internalized as a fundamental part of Acacia's corporate culture.

NOTES

EMPLOYEE NAME:

EMPLOYEE SIGNATURE:

DATE:



2017

EFFECTIVE MAY 1, 2017



REGULATORY COMPLIANCE POLICY

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