Acacia
Energy Group

2017

HEALTH, SAFETY & ENVIRONMENT POLICY

ACACIA ENERGY GROUP

SWITZERLAND | MALTA | NETHERLANDS | USA | UK

Message from the Founder, President & CEO

The Acacia's HSE Policy addresses Health, Safety and Environmental protection. It supports Acacia's vision and values and is an integral part of Acacia's commitment to the sustainable development.

Acacia Energy Group is committed to protecting health and safety of everybody who plays a part in our operations, lives in the communities in which we operate or uses our products. We strongly promote a safe and healthy working environment and the well-being of our employees.

Wherever we operate, we conduct our business with respect and care for both the local and global environment and systematically manage risks to drive sustainable business growth. We will not be satisfied until we succeed in eliminating all injuries, occupational illnesses, unsafe practices and incidents of environmental harm from our activities. We believe that all injuries, environmental incidents and health hazards can be prevented.

We strive to balance economic, ecological and social objectives to safeguard and strengthen our competitiveness in the global markets. We aspire to minimize our environmental footprint throughout the efficient management of our operations worldwide and optimization of the global supply chain.

Acacia is committed to the continued improvement management practices and monitoring of the HSE Policy at all our operations worldwide. Our dedication to HSE standards and principals will enhance our business success by earning public trust and recognition of Acacia as a leader in the HSE protection and its performance.

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

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INTRODUCTION

Acacia Energy Group's goal is to be a leader in the Health, Safety and Environment (HSE) protection. We strive to operate responsibly by building a long-term and sustainable business.

HSE is a fundamental component of Acacia's long-term business strategy. We consider HSE implications in the full spectrum of our worldwide business activities with the intent to protect employees, neighbors, communities, business assets, natural resources and the environment. This commitment is an integral part of everything we do.

This HSE Policy addresses the principles and management practices enabling Acacia to be a leader in all aspects of occupational health, safety and environmental protection as stipulated in the Acacia Corporate Code of Conduct. It describes Acacia's approach to minimizing health, safety and environmental risks and impacts. The HSE Policy sets basic expectations for all employees and is the foundation for mandatory internal HSE guidelines.

While HSE is everyone's responsibility, Acacia's management is responsible for implementing and maintaining good health, safety and environmental practices in areas under their control.

APPLICABILITY

This HSE Policy applies to all employees of Acacia Energy Group and its affiliates. The principles of this Policy apply where Acacia has operational responsibility, i.e. locations operated or controlled by Acacia Energy Group (either owned, rented or leased), and joint ventures in which Acacia bears operational responsibility.

This Policy contains Acacia's global principles and management practices, and is aligned with applicable laws and industry codes, such as the international management standards for environment (ISO 14001) and occupational health and safety (OHSAS 18001).

This Policy is to be implemented globally throughout tall locations of Acacia Energy Group, with amendments as required by local law or regulations where these are more stringent.

COMMITMENT

To meet our HSE commitments, Acacia Energy Group will:

- Demonstrate visible and active leadership that engages employees and service providers and manage Health, Safety and Environmental protection performance as a line responsibility with clear authorities and accountabilities.
- Ensure that all employees and contractors understand that working safely is a condition of employment at Acacia, and that they are each responsible for their own safety and the safety of those around them.
- Maintain "stop work policies" that establish the responsibility and authority for all employees and contractors to stop work they believe to be unsafe.
- Manage all projects, products and processes through their life cycles in a way that protects safety and health and minimizes impacts on the environment.
- Provide employees with the capabilities, knowledge and resources necessary to encourage personal ownership and motivation to achieve HSE excellence.
- Provide relevant safety and health information to contractors and require them to provide proper training for the safe, environmentally sound performance of their work.
- Measure, audit and publicly report HSE performance and maintain open dialogue with stakeholder groups and with communities where we operate.
- Comply with applicable HSE regulations and laws.
- Work with both governments and stakeholders where we operate to develop regulations and standards that improve the safety and health of people and the environment.
- Maintain a secure work environment to protect employees, contractors and the Acacia's assets from risks of injury, property loss or damage resulting from hostile acts
- Communicate our commitment to this HSE Policy to our subsidiaries, affiliates, contractors and governments worldwide and seek their support.

SUSTAINABILITY

At Acacia Energy Group, we believe that sustainable success can be reached only through people. No other asset in the company is as important as the people that contribute with their work to our culture and our business results

Therefore, we devote all the necessary energy and attention to protect employees, contractors and any other people involved with the company along with our global supply chain, including suppliers, customers and the public.

Acacia's culture considers protecting the health and safety of employees, neighbors, and others affected by our business activities and protecting the environment to be core values that are treated with equal importance with our other key business objectives.

While Acacia's management is responsible for implementing and maintaining good health, safety and environmental practices and leading by example (e.g. by demonstrating safe, healthy and environmentally responsible behavior), employees need to understand and respond to HSE matters with equal importance to other key business objectives. Employees are expected to perform their duties at all times with a sense of social responsibility.

HEALTH AND SAFETY

Acacia believes that accidents are preventable and therefore "one accident is one too many". We integrate Health, Safety and Environmental protection principals and standards in the management of our business in such a way that all activities are considered with a perspective of prevention of all types of accidents and protection of the people at work.

To advance a strong safety culture that effectively prevents accidents, we engage local HSE organizations that provide expert advice to managers and employees at our offices and production locations.

Acacia is committed to perform systematic identification of hazards and to manage them with appropriate risk assessments and subsequent actions to minimize potential danger. We establish emergency and contingency plans to deal with residual risks. This approach also minimizes threats to our businesses worldwide.

We promote programs to maintain and improve the health and well-being of our employees, including, but not limited to, providing tobacco-free worksites worldwide where legally possible.

Employees are encouraged to take advantage of voluntary health programs and to adopt healthy behavior, such as:

- Committing to exercise regularly
- Adding additional healthy activities into daily routines
- Making healthy food choices
- Participating in health screenings
- Where available, taking advantage of employee assistance programs.

Management is expected to support employees in their efforts to lead a healthy lifestyle.

We provide our employees with safe working conditions, and strive to protect them from potential health hazards and injuries. A risk assessment such as a Process Risk Analysis or Workplace Health Risk Assessment must be carried out before any potentially hazardous work is conducted.

Management is responsible for facilitating risk assessments and developing protective measures in cooperation with the employees. Employees must familiarize themselves with local safety requirements and respect them.

Employees are required to

- Wear adequate personal protective equipment, when required
- Respect safety warning signs and alarms
- Take part in training and observation programs e.g. mandatory site safety training, driver safety training, and behavior based safety program
- Report unsafe acts, conditions and safety risks.

Employees are expected to look out for their fellow colleagues and make them aware of any unsafe behavior.

ENVIRONMENT

We strive to use natural resources responsibly and to minimize the environmental impact of our activities as well as the impact of our products over their entire life cycle. This includes maximizing energy efficiency in our operations as part of our overall climate change prevention goals, as well as applying sustainable green chemistry where feasible in our refining operations.

Employees should do their best to minimize their environmental footprint in daily work, including applying the hierarchy of waste prevention measures (avoid, reduce, recycle and reuse of all materials).

Efficient use of energy

- Employees should always consider the most efficient use of energy and seek opportunities to reduce energy consumption at their workplaces. This includes switching off lights and equipment when not in use.

- Quality and facility managers should consider the efficient use of energy when establishing and managing condition set points (i.e. temperature, humidity and air change rates) within the acceptable ranges based on regulatory and compliance standards.
- Projects are reviewed for energy efficiency and use of renewable energy. Preference is given to investment projects improving energy efficiency with payback over the lifetime.

Reduction of greenhouse gas emissions

- Employees should whenever possible minimize travel and choose video or teleconferencing options when available and acceptable by the business.
- Sales employees should choose fuel-efficient cars and drive them safely and eco-efficiently to save fuel and minimize CO_2 emissions.

Recycling and minimization of waste

- Employees should avoid creating waste and use recycling options wherever local recycling systems are in place. They should consider the environment before printing e-mails, e-mail attachments or other working documents.
- Process engineers and developers should incorporate techniques to reduce and recycle solvents.
- Production employees should seek opportunities to reduce intermediates and active substances in wastewater discharges

Efficient use of water

- Employees should always consider the best use of water and identify possibilities to reduce water usage at the workplace.

Products and technologies

- Employees are expected to follow a clear process, which includes relevant HSE risk analysis and impact assessments to ensure the benefits balance any residual risks to our business activities, processes, and the environment.
- Employees should ensure that HSE considerations are integrated into product and process development, procurement, manufacturing, and in capital projects at an early stage.
- Employees should include green chemistry in product development processes.
- We engage in scientific peer review, and consider the benefits and risks of innovation in a structured, scientific and transparent manner.

COMPLIANCE

To be at the forefront of accident prevention in the industry, we implement at all our industrial sites and office location the mandatory Occupational Safety and Health Management System, which meets or exceeds the requirements of the health, safety and environmental laws applicable in the countries in which we operate.

We comply with local laws and regulations, and conform to internal requirements

- Management establishes Acacia's HSE Guidelines, and regularly conducts audits and management system reviews to ensure conformance with these Guidelines as well as compliance with applicable local laws and regulations.
- Refining operations, storage and terminals facilities are mandated to be certified according to recognized global standards (e.g. ISO14001 and OHSAS18001).
- Employees participate in industry networks to exchange best HSE practices.

CONSTANT IMPROVEMENT

Our Health, Safety and Environmental protection management system is based on the concept of continual improvement. We constantly improve our performance by designing and adapting processes, work practices and systems in the direction of better ergonomics and greater safety.

We base our improvement on the monitoring of safety and health performance as well as on the analysis of incidents that produce injuries and of workplace activities whose cumulative effects may lead to illnesses.

We strive for constant improvement in our HSE management system and its performance

- Management sets annual objectives and targets, regularly measures performance against them, and employees are expected to take early action if deviations occur.
- Employees are committed to honest reporting of HSE key performance indicators.
- We draw lessons learned from accidents and events, and we use them to raise and improve our standards and communicate these in order to prevent recurrence.
- Employees assess and mitigate HSE risks related to new products, processes and technologies to ensure their benefits offset inherent risks. These assessments are periodically reviewed in the light of new concerns or evidence, and include external benchmarking with relevant industry standards.

LEADERSHIP

Acacia Energy Group recognizes the critical role of senior management to ensure a safe and healthy work environment.

As an integral part of managing the business, Acacia managers at all levels are accountable for managing workplace health and safety standards with strong leadership and credibility. Their annual objectives include a contribution to the safety culture and performance.

To reinforce an already strong safety culture, Acacia sets ambitious goals and high standards, as part of its Health, Safety and Environmental protection management process.

At the same time, Acacia judges that employee involvement is indispensable to establish and maintain safety and health in the workplace. Respect of safety principles, standards and procedures is a condition of employment at Acacia Energy Group.

Equally, employees are empowered to:

- Challenge any unsafe or perceived to be unsafe acts they witness
- Put a work task or job on hold if they judge that safety is not adequate, until a competent manager takes appropriate risk control measures.

Employees are responsible for working in a safe manner to prevent injury to themselves, fellow workers and other persons. They are asked to become actively involved in programs to improve health and safety performance in the workplace.

BEHAVIORAL APPROACH

Acacia Energy Group attributes the highest importance to people's behaviors as the main factor for the prevention of accidents.

We believe that every time an accident occurs, the root causes can be traced to someone's behavior. Therefore, Acacia implements programs that encourage employees to engage in dialogue with peers and management about safe and risky behaviors.

COMMUNICATION AND EDUCATION

Acacia builds a proactive safety culture by

- Driving the implementation and constant improvement of the Acacia Health, Safety and Environmental Management System through communication with employees, contractors and other stakeholders
- Educating, training and equipping employees to ensure that they are empowered to avoid unsafe situations and to respond rapidly to unexpected events
- Influencing training and education of contractors, suppliers and community

We educate and engage with employees to enable active participation in HSE efforts

- HSE competence is ensured through appropriate recruitment, training and development. Employees are responsible for ensuring their commitment and participation. They also commit to understanding their HSE accountabilities and responsibilities and to carry them out to the best of their abilities.
- Management is expected to take seriously any HSE related concerns that are raised in order to improve our HSE performance.

TRANSPARENCY

We openly communicates HSE protection performance results internally and externally, e.g. on the Acacia's website and Annual Reports. We report our HSE performance transparently according to best-in-class international reporting initiatives. Emphasis is placed on recognizing and addressing any community and stakeholder concerns about HSE matters.

DEFINITIONS

Health, Safety and Environment (HSE) deals with occupational health, occupational safety and environmental protection, including, but not limited to, health promotion and protection, biosafety, process safety, chemical safety, fire safety and transportation safety, reduction of emissions to air and water, minimization of waste and the conservation of natural resources, water and energy.

Employees referred to in this HSE Policy are all persons who work on Acacia premises, including third party personnel, and Acacia employees working outside Acacia premises e.g. sales representatives.

CERTIFICATION, AUDITS AND IMPLEMENTATION

Acacia Energy Group implements this HSE Policy through the Acacia Health, Safety and Environmental Management System, which includes periodic self-assessments and specific audits. Management at Acacia's worldwide locations is accountable for its implementation.

To ensure a consistent and coherent implementation globally, Acacia submits all its production, storage and trading office sites to international HSE certification by independent accredited bodies.

Training

Employees are expected to familiarize themselves with this Policy and participate in HSE training sessions, which are held periodically at their locations.

Reporting Potential Misconduct/Non-Retaliation

Employees are expected to strictly observe relevant laws and regulations, as well as the Guidelines and procedures applicable to Acacia Energy Group. Any employee who learns of a potential violation of applicable laws or this Policy is required to report their suspicion promptly in accordance with the Acacia's Corporate Code of Conduct. Anyone who reports a possible violation of applicable laws or this HSE Policy will be protected from retaliation in any form.

Breach of HSE Policy

Breaches of obligations contained in this HSE Policy will not be tolerated and can lead to disciplinary and other actions up to and including termination of employment.

Exceptions

There are no exceptions granted to this HSE Policy. If there are changes in any field of HSE standards and regulations that would make a change of the HSE Policy necessary, Acacia's management will facilitate such a change.

Implementation

It is the responsibility of every Acacia Energy Group manager to implement this HSE Policy within his or her area of functional responsibility, to lead by example, demonstrating safe, healthy and environmentally responsible behavior, and to provide guidance to employees reporting to him or her. Management ensures adequate and appropriate resources are provided to comply with this Policy.

Monitoring

All aspects of HSE performance are reported monthly using Acacia's global data management system.Furthermore, quarterly HSE reviews and corporate annual HSE reviews are carried out by Acacia's senior management.

Locations are audited periodically according to their HSE risk profile. Audit results are reported to the Acacia's senior management.

LOCAL COMMUNITIES AND CONTRACTORS

Acacia Energy Group business model is based on the creation of shared value for the company and the society. With our work to foster our company's safety culture (e.g. through safe driving programs for employees and contractors) we also act on the safety culture of the communities in which we operate, both by giving an example of commitment and by reducing accidents during business outside our sites.

Acacia Energy Group employees worldwide are required to:

- Communicate with local communities and their emergency services, providing them with adequate health and safety information on our operations
- Ensure that contractors and other third parties entering Acacia sites have sufficient relevant information and training and are properly equipped to execute their tasks safely
- Regard health and safety management as an important consideration in supplier and contractor selection
- Encourage employees to apply their safety and health protection knowledge in their private life, at home and during leisure.

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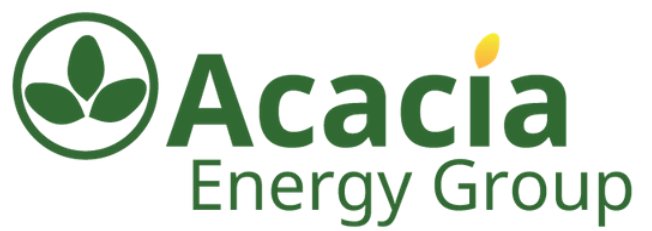EMPLOYEE NAME: EMPLOYEE SIGNATURE: DATE:

2017

EFFECTIVE MAY 1, 2017

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