



ANWAR AKKAD SONS GROUP

THE GLOBAL COMPACT – COP 2015



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Chairman Message

August 03, 2015

**H. E. Ban ki-Moon
Secretary - General,**

Dear Mr. Secretary - General,
I am pleased to confirm the continued of the ten principles of the Global Compact on human rights, labor, environment, and anti-corruption by AASG.

As a Group we're always adhered to social responsibility. In all of our activities we do our best to ensure that all economic, environmental and social factors are considered.

In addition of being committed to our principles of honor, respect and Sincerity makes us more responsible as an enterprise, managing a leading group enforces a process that starts at my office and goes throughout the Corporation to each and every employee and manager in this enterprise. We share in this commitment as a team because it is the right path.

In the future we will working in the line with the Global Compact Principles, and will further integrate the principles in our business practices due to the fact that the Global Compact represent and which reflect at the same time our believes which we inherited from elder generations.

Sincerely yours,

Hashem Akkad





Introduction

Anwar Akkad Sons Group is a diversified group of companies in the fields of Oil & Gas Industry, Food Industry, Tourism, Insurance, contracting and Exhibitions. The reputation Akkad Group gained through the excellent performance, integrity and competence, and which reflects the closely-knit management of professionals whom have decades of experience.

While the business continues to evolve with the development of new technologies and discoveries, Akkad Group is well positioned to adapt and capitalize on this dynamic environment.

We are working for a brighter future and we value the confidence that each partner places in us, and this trust is vital in all of our decision-making.

Akkad Group strategy is based on a continuous development plans renewed annually according to the group activities, compatible with the universal development. Moreover, Akkad Group cares to make use and access to the latest inventions and technology applications through the alliances and cooperation with sound international companies.





Akkad Group Logos



Anwar Akkad Sons Group Activities

Activities Of AASG

- Industry and trade of yarns, textile, clothes (garments) and linen (underwear).
- Industry and trade of foodstuffs.
- Industry and trade of beverages and natural juices.
- Trade of medical materials and medicines. And supply of equipments for scientific laboratories.
- Trade of Chemicals and petrochemicals.
- Industry and trade of Computers and Internet systems.
- Industry and trade of telecommunication equipments and telephone switchboards.
- Trade of electric and telecommunication cables and related fittings.
- The trade of machinery, industrial equipments and production lines.
- The trade of generation stations, generator sets, transformers and electrical requirements.
- The trade of sanitary products, bathroom sets, ceramic and marble.
- Industry and trade of building materials, pre-fabricated metallic buildings and their requirements.
- Trade of Real Estate, lands and Construction.
- Industry and trade of plastic materials.
- Industry and trade of plastic materials.
- The trade of air-conditioners, refrigeration equipment, refrigerators, freezers and compressors.
- The trade of vehicles of different types and for different purposes.
- Study and execution of Turn-Key projects and rehabilitation projects for buildings, hospitals and hotels.
- Study and execution of water projects(pumping stations, sewage stations, dams, bridges, etc.)
- Study and execution of personal lifts, cargo lifts of different types and sizes.
- Study and execution of oil and gas projects.
- Providing oil rigs and related accessories, in addition to oil-field services.
- Study and execution of water reservoirs, oil -tanks and oil derivatives tanks.
- The execution of road, T.V., radio and written advertisements. The execution of advertising companies projects.
- The execution of all kinds of printing projects.
- Tourism , travel services and rental car.
- Tourism investments (Hotels, Restaurants Investments , etc.),
- The organization of fairs and conferences.
- General agencies and representation of Arab and foreign companies. Participation in tenders inside Syria and abroad.
- Media Equipments , Television & radio transmission stations .
- Constructing Supplying, offering, installing and operating grain mills and silos of different sizes, capacities and kinds.



Akkad Group People

Akkad Group and employees are well experienced and have set up a firm footing in the industry, developing a sound relationship with the clients based on trust and passion to deliver on time and exceed expectations.

As a world-class, multi-activities business leader, we need to continually reach out to new and various horizons to succeed in the regional market. This means we had to create a working environment that attracts the best professionals with the biggest ambitions and the highest standards. The Akkad Group team is naturally multifarious Comprises 1000 people with a wide combination of skills, backgrounds and perspectives. We use this source of massive potentials to form a great group, a great team of professionals adhered to the success of our branches on projects of Great importance to our country.



Fiorella pasta is made from the finest Durum Wheat Semolina which is being exported to Italy to be used in Italian Pasta Manufacturing.

The applied quality system is matching the large international companies' conditions, and internationally accepted standards.



Anwar Akkad Sons Group draws its strength from:

- Strong business relations and market presence.
- Projects understanding and full respects of their needs.
- Fast accommodation with projects requirements.
- Respect of customer needs and benefits.
- Commitment is first priority obligations.
- Following modern business practiced activities and continuously upgraded ambitious targets.



- To be “On Spec, On Time, Every time” through continual improvement and innovation of every aspect of our operations in order to meet and exceed our customer’s expectations.



The image shows a promotional graphic for Salsabil Co. On the left is the Salsabil logo, which includes a stylized wave icon and the text 'Salsabil' with the tagline 'The Specialty Soft Drink Manufacturer in Syria'. To the right of the logo are four product logos: Coca-Cola, Crush, Canada Dry, and Sprite. The background features a close-up, high-angle shot of water splashing, creating numerous bubbles and ripples. At the bottom, there is a light blue rectangular box containing a bulleted list of company information.

- Salsabil Co. is a specialized company in bottling and canning carbonated soft drinks.
- Products of our company are : CocaCola, Sprite, Fanta, Crush, CanadDry, and SportCola
- Kinds of bottles are : PET, Can, Glass
- Products size are : 250 ml, 330 ml, 0.5 L, 1,250 L and 2,25 L.



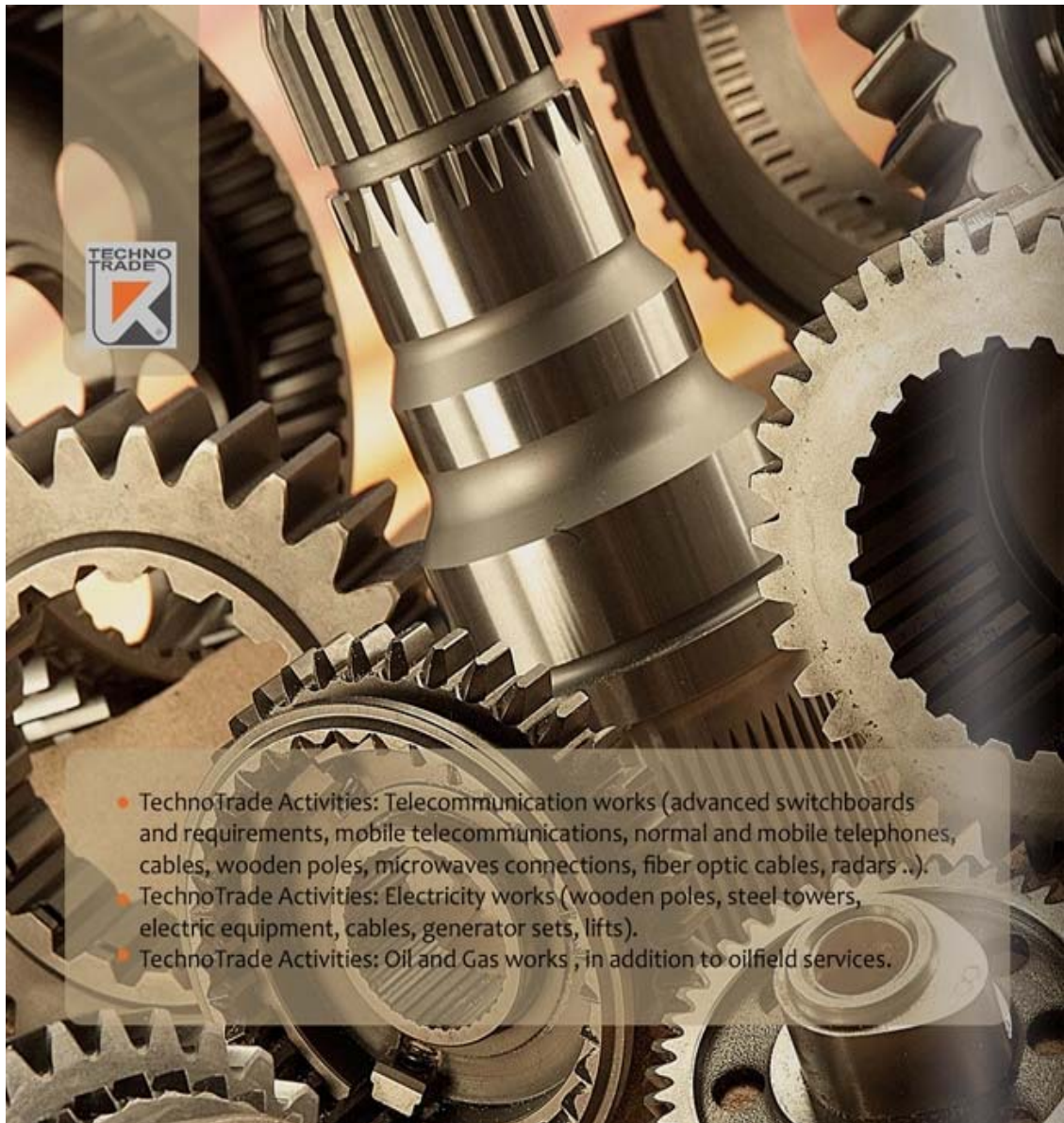
Akkad Group Mission

Akkad Group is committed to perform all its businesses in the international market by following the international standards rules, laws and ethics. In addition, the Group is committed to protect the environment, human and assets of others, in all its operational areas. These targets are achieved by applying the most restricted Health, Safety and Environmental protection standards, rules and regulations.

Akkad Group is also committed to perform all its transactions, operations and management systems following the international ISO standards.



Your advertising by MUPI boards is directed to all ages and social classes.



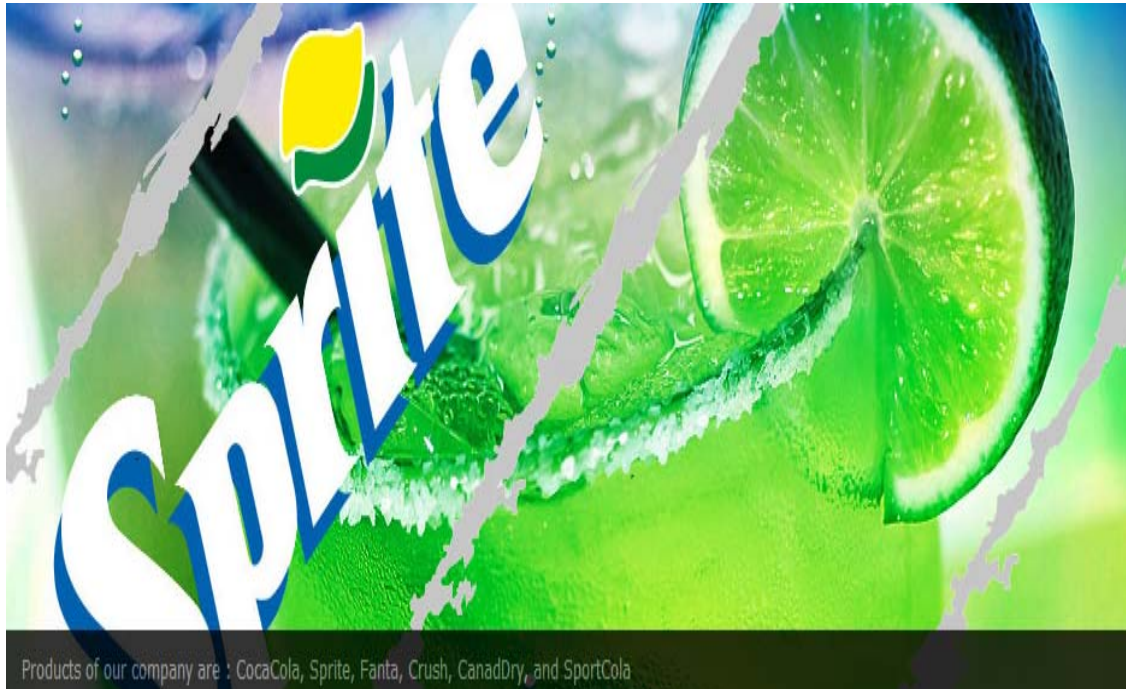


Akkad Group Vision

Akkad Group was, and will remain, famed for its quality jobs, we will strive to be recognized among our customers as "The Best", and we shall understand and anticipate their needs and respond them with innovative, value-added services.

Improvement, quality control shall be the integral part of our business process.

Akkad Group is cooperating with well-known experienced international consultants in all related fields of activities.







Strategy overview

- **Maintaining a leading position in its activities.**

Akkad Group will work harder and harder to maintain the leading position it has obtained and develop it to be recognized worldwide as Leader Company.

- **Investing in developing the team and attracting skilled staff and management.**

Akkad Group consider its team as an asset who will push forward to get to our target; therefore an extensive courses in all sectors is applied in cooperation with an international houses to enhance the standards of its employee

- **Expanding our activities in a very steady steps.**

The Group does not plan a rapid expansion but is more willing to proceed with sure and steady steps, which shall be taken after careful study of the market and the importance of contracts to be signed.

- **Extending our activities worldwide.**

Despite the global economic downturn, we are always looking to expand our business into new locations around the region, and around the world!

A photograph of a silver Bentley Continental sedan displayed on a billboard structure. The car is shown from a front-three-quarter view. The billboard is supported by a metal frame and a central pole. In the background, there is a clear blue sky. On the left side of the billboard, there is a vertical logo for 'Körol' in Arabic script. Several spotlights are mounted on the billboard structure, pointing towards the car.

- The job of this company is advertising: Road side, Radio, Television and Written. Your advertising by MUPI boards is directed to all ages and social classes.
- High quality posters printing service.



Quality at Akkad Group

A quality policy at Akkad Group is a part of the general policy of the group that express its desire in being a leading group in all its activities and continuous improvement of the styles and methods.

The group is the application of effective quality management system that matches the requirements of international standard ISO 9001 -2008, and legislative and legal requirements to ensure product quality and safety and the observance of the requirements to maintain occupational safety and the environment. And continuous improvement of production elements and methods by applying the processes approach in all activities to ensure the development of performance to meet constantly changing requirements of customers and focus on the appeal to them.

Management in the group is committed a general framework for quality objectives to ensure that:

1. Develop and improve methods through the rational use of available resources.
2. Development of systems to maintain the environment and contribute to projects that purposes to reach a better environment.
3. The permanent development of the material and human resources through training and awareness.
4. Improve the group's position in the market and work to develop sales.
5. Meet current and future needs of the market and meet the changing requirements of clients and agencies contracted with and to focus on their satisfaction.
6. Work on infrastructure development and improving the work environment.

7. Create a spirit of cooperation and creativity among all employees in the group and work as one team.
8. Application of the processes approach in all activities to ensure the development of performance consistently.
9. Fulfill the conditions of occupational safety and working environment, and developed it to include employees of the group, contractors, sub-contractors, building, facility and equipment in all work sites of the group's head office, branches and transport mechanisms and employees. And the preservation of the environment and reduce pollution.

The high management in the group is committed to lead the group always for the better and to follow of systemic approach in management and a realistic approach in decision making and participation of workers to achieve the goals of quality. Management is working seriously to establish a mutually beneficial relationship with suppliers and the consolidation of good relations with all interested parties.





Quality assurance

The following are our practice to maintain quality assurance.

- Establishing a high level of communications and understanding with customer to satisfy all customer's needs.
- Focusing upon services which reflect our customer satisfaction and continuously promote effort toward improvement
- Carefully selected our chain suppliers' base according to our customers' quality standards.
- Maintaining the highest levels of quality by using documented specialized control methods and supervision

Our Customers: Experience our services, as exclusive standard at the most economical rate. They recognize Akkad Group as one of the dedicated Group that would meet both their current requirements and future needs.

Our Suppliers: view us as partners who clearly define requirements and expect in return, raw materials, products and services that fully meet these requirements.

Our Employees: Is a part of Akkad Group family, as an integral family Akkad Group has strived to achieve the zero defects. They understand that as an employer, Akkad Group values them as assets and will provide them with opportunities for future growth.





Akkad Environment Approach

Environmental Protection Policy

Akkad group is committed to following:

Minimize emissions, effluents and wastes which caused from company's different activities to the less standard and improve efficient use of natural resources and energy.

Minimize the impact of its different activities to the less standard on the environment and protect endemic fauna and flora at all sites of operations.

Will operate its facilities and equipment in compliance with applicable National, International and local environmental regulations.

Where Akkad group becomes aware of a hazard representing a risk and not covered by existing laws or regulations, Akkad group will develop its own environmental standards and practices to provide for adequate protection of employees, public health and the environment.

Akkad group will adequately train its employees to ensure awareness, understanding, and implementation of environmental rules, responsibilities and accountabilities.

Akkad group facilities managers (equipment's, warehouses, and workshops) will ensure that this policy is followed and they are familiar with the environmental issues at their facility.



Akkad Health, Safety, and Environment Approach

HSE Policy Statement

We are in Akkad Group Company committed to:

Pursue the goal of no harm to people – prevent pollution and protect the environment.

Assure the integrity of people and facilities.

Support energy conservation.

Promote ownership and leadership HSE at all levels of Akkad group contractors and clients.

Play a leadership role in promoting HSE best practices in community.

Promote a positive culture in which Akkad group employees and contractors share this commitment.

To achieve this commitment Akkad group will:

Comply with all applicable laws and regulations, and relevant international laws and standards.

Implement an effective risk based HSE and integrity management system with clear HSE targets and objectives to achieve continuous improvement.

Manage all foreseeable risks to the health environment and take appropriate measures to eliminate where possible, otherwise minimize HSE risk.

Take necessary measures in the design construction, operation, maintenance, and documenting of our facilities to ensure the prevention of injury, ill health, and pollution.

Openly report measures, monitor, apprise, and learn from HSE performance and take corrective actions when necessary.

Conduct periodic audits and reviews to verify compliance with the principles of this policy and take appropriate corrective actions.



The application of this policy is on behalf and direct responsibility of management, employees, and contractors involved in Akkad group activities.

An advertisement for United Oil Company. The background is a photograph of an oil rig silhouette against a sunset sky. On the left side, there is a vertical orange bar with the text 'UNITED OIL' in white, bold, uppercase letters. At the bottom of the image, there is a semi-transparent dark orange box containing a list of three bullet points.

UNITED OIL

- United Oil Company has an infrastructure equipments designed on the modernist systems applied on searching and drilling oil.
- United Oil Company supply of all oil field equipments, materials and spare parts.
- Full service from exploration, digging, extraction, and testing to marketing.

Group Responsibilities

Akkad Group is committed to play a development role in each country it operates, and is proud to be recognized among the domestic staff and the people as a company that perform its job considering the culture and upgrading the level of its employee and prepare them to be a strong asset to build their country.





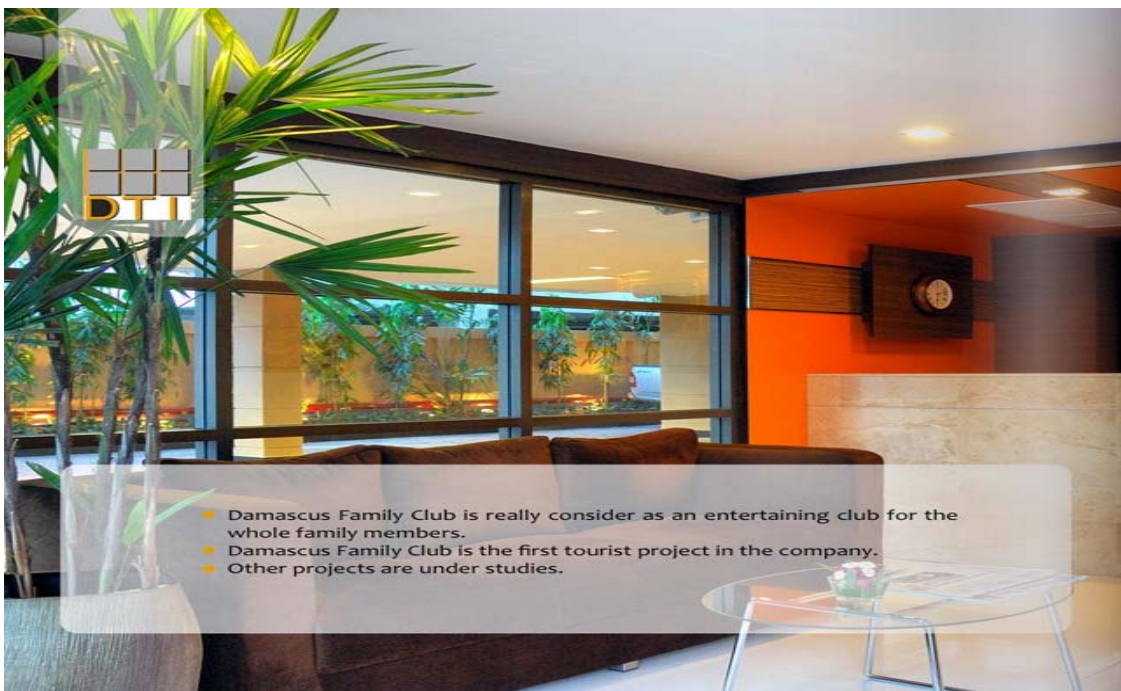
Commitment - Supporting the Global Compact Principals

Akkad Group is committed to continue support the Global Compact principals in the fields of Human Rights, Labor, The Environment and Anti-Corruption. We are looking to be an active partner in implementing these principals which go with our beliefs.

Our commitment exceed our own group, we are making a whole campaign utilizing our facilities to explain the importance and advantages of implementing the ten principals.

We have made several workshops and meetings with the executives in our group to consider the implementation of the ten principals in their day to day activities.

We have implemented an Environmental Protection Policy, HSE Policy, expand and developed our Anti-Corruption Policy.



Human Rights

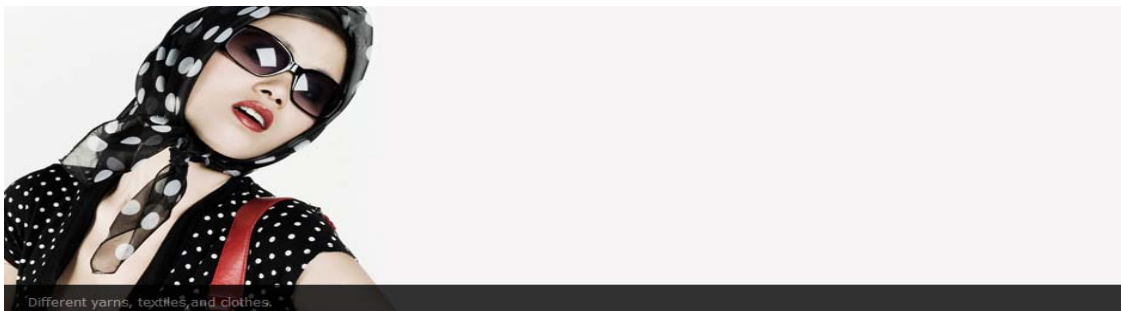
- ∞ **Principal 1:** Businesses should support and respect the protection of internationally proclaimed human rights, and
- ∞ **Principal 2:** make sure that they are not complicit in human rights abuses.

Akkad Group respects the Human Rights and is applying a healthy and safety management system that conform to the best practices in the world.

Human rights are an essential part of the group operations, we have done many workshops and courses to ensure and clarify to our employees the importance of respecting the human rights of the employees, colleagues, family and society.

Akkad Group is also not complicit in human rights abuses, on the contrary, Akkad Group prevent any kind of human right abuse by giving a clear instruction to the executives in the group to make sure that all the employees should work against any kind of human rights abuse by having long and detailed discussions with all the people in the group.

Akkad Group continued support and adheres to the guiding principles that promote worker human rights. Chairman, General Managers, Chief Executive Officers, Project Managers, Division Managers and every one are responsible for identifying human rights needs and providing appropriate training.





IMPA Roles

- Designing medical services programs based on beneficiaries needs and budget, these programs can be ready or custom made.
- Organizing the membership and the medical files of beneficiaries by issuing a medical card which has all necessary information.
- Creating and managing the medical providers network (hospitals, doctors, pharmacies, labs&c.); this network can be ready according to the plan or custom made.
- Managing and organizing the way by which the beneficiary can obtain the required medi-



Labour

- ∞ **Principal 3:** Businesses should uphold the freedom of association and the effective recognition of the right of collective bargaining;
- ∞ **Principal 4:** The elimination of all forms of forced and compulsory labor;
- ∞ **Principal 5:** The effective abolition of child labor; and
- ∞ **Principal 6:** The elimination of discrimination in respect of employment and occupation.

Akkad group is committed to continue support the four principals of labor and is working to ensure workforce is aware of theses principals. The labor has an important part of Akkad Group strategy and we are committed to eliminate of all forms of forced and compulsory labor.

Because we consider it as red line, Akkad Group prevent child labor in its companies and factories, theses instructions is clearly stated in the internal system of the company and in the Human recourses System.

AASG is committed to:

- Continuous improvement in our Corporate and Social Responsibility (CSR) strategy.
- Encouraging our business partners to strive for continuous improvement.
- Acting responsibly, operating sustainably, and contributing to the communities in which we work and live.
- Operating in a manner consistent with the UN Global Compact and its 10 principles covering human rights, labor, the environment, and anti – corruption.
- Executing socially responsible behavior in all aspects of our business.



- Continually improving our performance and complying with all relevant regulatory requirements.
- Encouraging employee awareness of environmental impact of all business actions

Measurement of outcomes

Gender and ethnicity

AASG maintains a policy of providing employees with equal opportunities for development of skills and offering new challenges within our Company. All employees are treated equally, irrespective of ethnic background, gender, religion or age – and they are offered equal opportunities for development and promotion to managerial positions. Gender - based discrimination is not allowed in terms of recruitment, promotion or wage compensation. Of 55 employees, 54.5% are men and 45.5 % women, respectively.

Absence rate Compared to 2014 the recorded absence rate at the headquarters has been reduced by 8%.

Lost Time Injury Frequency

LOST Time Injuries / Days remain at 0 respectively.

Response to Labor Standard violations there have not been any reported possible breaches of Labor Standards since AASG became a member of the UN Global Compact in 2012, AASG Human Resources Departments have not reported any breach of any Labor principles for 2015.

Goals 2016

- Clearly state minimum age limits for AASG employees in overall governing documents and the implementation of the age verification procedures.
- Establish a corporate procedure on reporting of breaches/no breaches of Labor principles.
- A safety culture survey will be carried out in 2016 to map our existing safety culture and to initiate measure for improvement.





Environment

- ∞ **Principal 7:** Businesses should support a precautionary approach to environmental challenges;
- ∞ **Principal 8:** Undertake initiatives to promote greater environmental responsibility; and
- ∞ **Principal 9:** Encourage the development and diffusion of environmentally friendly technologies.

Environmental Principles

Principle 7, 8 & 9

- Businesses should support a precautionary approach to environmental challenges.
- Businesses should undertake initiatives to promote greater environmental responsibility.
- Business should encourage the development and diffusion of environmentally friendly technologies.

Assessment: Policy and Goals

AASG Health, Safety & Environmental Policy

- AASG believes exemplary performance in the areas of health and safety is essential to fulfill our business goals and meet the expectations of our people.
- AASG will comply with all applicable health and safety laws and regulations and adopt best sound professional judgment where laws and regulations do not exist.
- Occupational health and safety values will not be compromised. No job is so important and no task so urgent that the necessary steps



cannot be taken to perform it safely and maintain the health of our employees, contractors and the public.

- A Sustainable Supply Chain policy is maintained and sets out the principles, policies, and procedures on sustainable business activity
- Policy acts as a prompt for employees to consider sustainability in all purchasing and business decisions.
- AASG strives to minimize the adverse environmental effects of product transport and business travel.

Impact on Society

- AASG is committed to effectively supporting the needs of local communities where we do business.
- We will work closely with local and wider communities to promote cooperation and sustainability.

Implementation Environment Management System

AASG is committed to operating its businesses throughout the world in a manner that meets or exceeds applicable environmental laws and is protective of the environment and public health. We are aware of the importance of natural resources to the quality of human life and will strive to continuously improve the management of our environmental responsibilities.

Our Environmental Management System is fully applicable to all global AASG facilities / locations. EMS is designed to reduce impact on the environment through commitment to continuous improvement by the following:

- Execute bi-annual audits for all vendors to verify compliance to newly EU released RoHS, WEEE, REACH, and substances of high concern. Ensure all product components are non-toxic.
- Work with vendors to reduce their impact on the environment
- Verify all products utilize recyclable materials. Ensure all product component materials can be separated for recycling and repurposing.
- AASG fleet vehicles are 100% electric plug-in hybrid for zero VOC emissions.

- Ensure paper products used originate from forests independently certified as well-managed according to the standards of the Forest Stewardship Council, or from recycled materials. All paper products are environmentally friendly throughout the company.
- Management program. Upon submission of electronic items, all data containing devices (hard drives, etc.) are purged of data per NIST Guidelines for Media Sanitization. All electronic items are DE manufactured, separated by component, and recycled appropriately and responsibly. (REF: RNA Worldwide Statement of Sustainability).
- Many projects remain on the agenda for 2016 with an environmental focus. Some of them are new and some are on-going. Main focus for our projects will be to reduce our emission Of GHG greenhouse gases.
- Energy Saving Campaign in 2016 an internal campaign will be launched encouraging all AASG employees to suggest energy-saving initiatives where the best proposals received awards. Many of the proposals will be initiated in 2016.

All Akkad Group employees and company worksites are responsible for maintaining the integrity of environment programs, obeying all environmental rules, following environmental practices, and informing supervisors of any unsafe act for environment.



It is Akkad group policy to prevent damage and minimize environmental impact as much as possible; Akkad Group will specifically strive to:

Always exercise due diligence in protecting the environment.

Abide by all governing regulations.

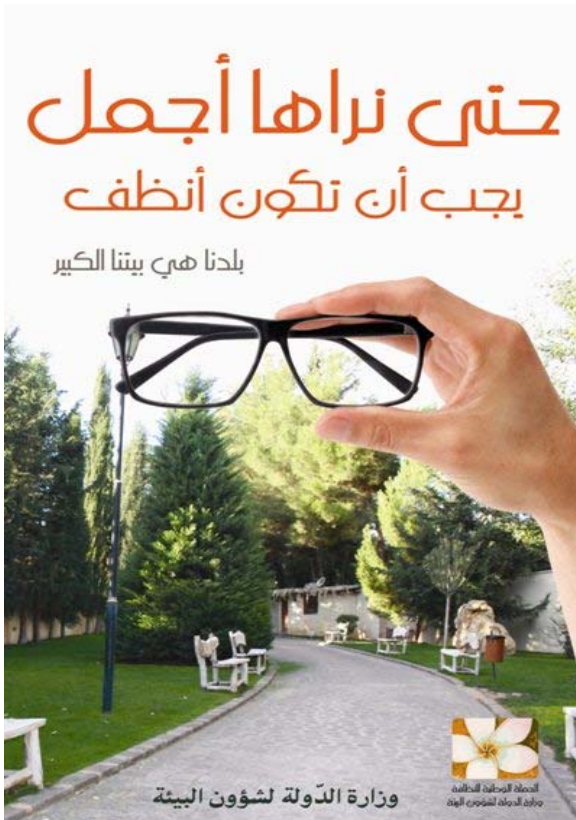
Containment spills; water source contamination, destruction of vegetation or any other violation of environmental laws is not permitted.

Workers must immediately report all chemical or hydrocarbon spills to their manager.



Go Green in all the company sites, and we have planted many trees in our company site in Syria & Iraq.

Moreover, Akkad Group has executed several campaigns for instructing people to take care of the environment; hundreds of posters were spread in the advertising company network all over Syria.





Anti-Corruption

∞ **Principal 10:** Businesses should work against corruption in all its forms, including extortion and bribery.

Businesses should work against corruption in all its forms, including extortion and bribery, Assessment, Policy and Goals.

Bribery and Corruption policy AASG has adopted an anti-corruption and trade control compliance program to set forth and communicate its policies concerning compliance with U.S. foreign anti-corruption laws, including the FCPA, and Global Trade Control Laws, and to prevent violations of those laws. This compliance program covers the following key principles:

- It is the individual responsibility of all employees of AASG to comply with all applicable U.S. foreign anti-corruption laws, including the FCPA, and Global Trade Control Laws.
- AASG employees have no authority to engage in, permit other employees to engage in, approve or tolerate any conduct that violates applicable U.S. foreign anti-corruption laws, including the FCPA, and Global Trade Control Laws or AASG's anti-corruption and trade control compliance policies.
- Employees in management positions are personally accountable not only for their own actions but also for the conduct of their subordinates. Therefore, each manager should take particular care to implement appropriate internal controls to reduce the risk of U.S. foreign anti-corruption and trade control violations.
- Any employee who violates AASG's anti-corruption and trade control compliance policies may be subject to disciplinary action, up to and including termination.
- Consistent with the foregoing principles, all employees must personally comply with the FCPA, Global Trade Control Laws and these guidelines. No AASG employee has authority to direct or approve any violation of the FCPA or Global Trade Control Laws, nor will AASG



condone any conduct that could give rise to charges under the FCPA and Global Trade Control Laws.

- All employees shall conduct their actions in keeping with applicable, relevant laws and regulations. Beyond that, all employees shall respect safety and environmental concerns and be responsive to the concerns of the wider society.
- AASG Personnel and third parties acting on behalf of UAF are prohibited from making Facilitation Payments—directly or indirectly to Foreign Government Officials. Any attempt to conceal or disguise Facilitation Payments will be considered a serious breach of this Policy.
- Personnel and Third Parties are prohibited from making Political Contributions on behalf of AASG. Political Contributions are monetary or non-monetary (e.g. resources, facilities, or employee time) contributions made to support political organizations and their causes. Personnel and Third Parties are prohibited from making Charitable Donations on behalf of AASG.
- AASG Personnel are required to conduct thorough due diligence prior to engaging Third Parties. Third Parties that are known or suspected to be paying, offering or accepting bribes, or engaging in any other sort of criminal or unethical conduct are not acceptable as partners to AASG and shall not be engaged. AASG can be held responsible for the actions of Third Parties acting for or on behalf of the Company under the FCPA.

Measurement of outcomes

We have established anti-corruption measures as a part of our purchasing routines. For instance, execution of purchase and approval of corresponding invoices shall be performed by separate employees.

We have in Akkad group a clear instruction to avoid and not doing anything related any kind of corruption internally and externally and all the executives



are responsible to make sure that everyone in the group is working against corruption in all its forms including extortion and bribery.

The Policy:

Corruption is the abuse of entrusted power for private and usually commercial gain. Akkad group takes a zero-tolerance approach to corruption and is committed to carrying out business fairly, honestly and openly, and without improper influence. United Oil Inc. does not, either directly or indirectly, through intermediaries or other third parties, solicit, receive, offer, promise or provide any financial or other advantage of material value or otherwise exercise improper influence in its dealings with other businesses, or with government or public officials with the intention of obtaining any improper advantage in the conduct of its business. All Relevant Persons are required to comply with this policy and are responsible for ensuring that Akkad group business is undertaken with the utmost integrity with regard to the following matters:

2 Bribery:

Bribery is unlawful in all jurisdictions in which Akkad group operates. Akkad group prohibits all forms of bribery. Bribery is the direct or indirect offering, promising, giving, accepting or soliciting of a financial or other advantage that results in an activity being performed improperly (for example in breach of trust, in bad faith or in a biased manner). The advantage may have been offered or received, or the improper performance undertaken, directly or indirectly (for example, via a customer, agent, intermediary or supplier). The improper activity may be connected with Akkad group's business (including the activity of employees or third parties working on behalf of Akkad group) or with the functions of government or other public bodies.

3 Facilitation payments:

Akkad group prohibits facilitation payments. A facilitation payment is payment of a bribe to a government or public official to secure or expedite



the performance of a routine action to which the payer is entitled. United Oil Inc. recognizes that there may be circumstances in which an official immediately threatens or compromises the personal safety and security of an individual concerned (or another) in order to procure the payment. In such situations, any payment must be reported in accordance with the relevant procedures.

4 Gifts, entertainment (hospitality) and expenses:

Akkad group recognizes that fostering good relationships with business partners is important to its continued success. The provision and receipt of modest gifts and entertainment, and the incurring of modest expenses, are acceptable in principle provided that they are reasonable and made transparently. However, the provision or receipt of any gift or entertainment, or the incurring of any expenses, is not permitted where it is offered or received in exchange for a business or other improper benefit, creates (or may create) any sense of “obligation”, influences (or could influence, in any way) business judgment or creates (or may create) a conflict between a Relevant Person’s personal interests and those of Akkad group or is otherwise illegal. Any activity that could be perceived as having any of the above effects is also prohibited. Akkad group’s business decisions and those of its partners must be made (and be seen to be made) objectively and without influence by gifts or favors. Relevant Persons may only offer or accept corporate or personal gifts of a modest value. In all circumstances, gifts, entertainment and other expenditure must be subject to an appropriate disclosure process and gifts, entertainment and expenditure above a specified value must be subject to an appropriate (prior) approval process. It is anticipated that values will vary according to the jurisdiction concerned.

5 Third parties:

Akkad group is aware that its reputation may be damaged by the conduct of third parties acting on its behalf or by others with which it does business. In



certain circumstances, their actions can have legal implications for United Oil Inc. As such, it is not acceptable for a third party acting on United Oil Inc.' behalf to act in a way which would breach this policy were the act in question undertaken Akkad group directly. Akkad group is therefore committed to:

A. Taking reasonable steps to ensure that its business partners are made aware of, understand and adhere to this policy (and, where relevant, its associated procedures).

B. Verifying the integrity and reputation of its business partners through appropriate and reasonable due diligence in light of perceived levels of risk.

C. (where appropriate and possible) putting in place appropriate and reasonable controls to monitor the use of Akkad group's money by third parties acting on Akkad group's behalf.

6 Interaction with government officials and lobbying:

Akkad group does not, directly or indirectly through intermediaries or other third parties, offer, promise or provides any financial or other advantage or otherwise seeks to exercise improper influence in its relations with government or public officials in order to obtain any improper advantage.

7 Charitable contributions and sponsorships:

Akkad group makes charitable contributions and offers sponsorships for the purposes of socio-economic development or linked to cultural or sporting activities and not for improper business purposes. Charitable donations and sponsorships must not be perceived as being given for improper purposes. When a charitable contribution or sponsorship is proposed, it must be transparent, documented, made in accordance with applicable law and assessed for compliance with this policy and any related procedures.

8 Political donations:

Akkad group does not participate directly or indirectly in party politics and does not make payments to political parties, politicians or related organizations.



9 Use of company assets:

Relevant Persons have a responsibility to protect Akkad group assets from theft, loss, abuse, unauthorized use or disposal. They must use company assets only for purposes related to conducting their. Akkad group's responsibilities and may use company assets for other (including personal) uses only when properly authorized.

10 Conflict of interest:

Relevant Persons must avoid conflicts of interest and are expected to perform their duties conscientiously, honestly and in accordance with the best interests of. Akkad group Relevant Persons must not abuse their position, misuse confidential knowledge for personal or third party gain, or have any direct involvement in any business interest which diverts their attention from, or is in conflict with, . Akkad group's commercial interests, or which in anyway compromises their independence and impartiality.

11 Mergers, acquisitions and joint ventures:

Akkad group is committed to undertaking appropriate and reasonable due diligence on the reputation and integrity of any business in which it invests.