

QuinnOil

El Barú Petroleum Supply S.A.



Grand Mariner Corp.

Code of Conduct and
Ethics.

2017

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Code of Ethics and Conduct of QuinnOil Group

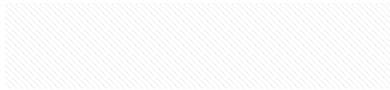
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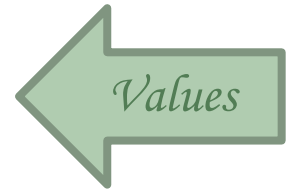


CODE OF ETHIC AND CONDUCT OF QUINNOIL



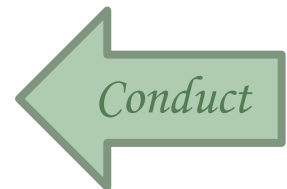
The Code of Ethics and Conduct reflects the highest standards of governance and ethical behavior to which QuinnOil Group management and employees are committed

The prestige and reputation of a company is built with the honesty and honest behavior of the people who form it. This code of ethics and conduct sets out guidelines for how we should act in our daily activities in order to carry out our mission as a company in a correct way.



This code of ethics and conduct is applicable to all representative members of the company, its managers, administrative and employees.

We expect that our customers and suppliers rely on the same ethics standards to engage on their activities in an ethical manner by complying with all applicable laws and regulations as well as any requirements stated in this document.



GENERAL BEHAVIOR

In QuinnOil Group we are committed to carrying out our activities with honesty, integrity, transparency and respect for human rights and the legitimate interests of all the people and organizations with which we relate.

QuinnOil Group's customers and suppliers must always provide a healthy and safe working environment for all employees.



THE STAFF



Responsible

We are committed to creating and maintaining a creative work environment, trust, respect and fair treatment for our staff, while acting without discrimination based on religion, sex, age and nationality.

We are committed to providing our staff with safe and healthy working conditions while at the same time developing and improving their skills and abilities.

CLIENTS AND SUPPLIERS

We are committed to serve the market with products and services of the highest quality, meeting the needs and exceeding the expectations of our customers. Our treatment will be honest and respectful looking for the development of both parties

QuinnOil Group suppliers must:

- Refrain from causing damage to the environment.
- Look for methods to reduce the environmental impact of your actions.
- Maintain an effective program of administration and reports of health, safety and environmental problems.
- The use of alcohol and drugs is prohibited during the performance of work duties.

QuinnOil Group suppliers must:

- Ensure working conditions that are in accordance with local regulations.
- Compensate employees fairly or at least to a level where their basic needs are met.
- Maintain a work environment in which all employees are treated with respect and in which any form of harassment, exploitation or abuse is excluded.

QuinnOil Group Suppliers SHOULD NOT

- Directly or indirectly employ a child laborer or forced labor in any way.
- Discriminate based on age, descent, race, marital status, disability, nationality, religion, political affiliation or sexual orientation.

BUSINESS ETHICS OF SUPPLIERS



Integrity

The Company is committed to developing mutual beneficial business relationships with its suppliers based on competitive quality, prices and services. Honest and complete treatment is the basic condition of the relationship.

QuinnOil Group suppliers must:

- Protect all confidential information provided by the QuinnOil Group.
- Respect the intellectual property of QuinnOil and affiliates.
- Search for goods and services from suppliers of which to a similar degree of governance and ethical behavior is demanded as provided by this Code of Ethics and Conduct from the QuinnOil Group.

QuinnOil Group Suppliers SHOULD NOT:

- Couple or tolerate fraud, extortion or the payment of bribes and any other form of corruption.
- Give gifts that are more than face value
- Participate in or facilitate money laundering
- Failure to comply with trade sanctions
- Failure to comply with competition laws



Cooperation

Suppliers of the QuinnOil Group will not participate in any form of conduct in which an internationally declared human right is violated.

The QuinnOil Group can request and receive documents that demonstrate compliance with the requirements of the QuinnOil Group Code of Ethics and Conduct and physically audit the suppliers.

At the time, the supplier fails to comply with the terms of this Code of Ethics and Conduct of QuinnOil and its affiliated companies, actions will be taken against the supplier including termination of the contract between QuinnOil Group and you and / or parties involved.

DISFFUSION AND COMPLIANCE

QuinnOil Group is committed to ensuring that the principles set forth in this Code of Ethics and Conduct are communicated, understood and observed by all employees and officers.

In the same way, the affiliated companies are committed to comply with the laws and regulations of the country so that the development of their activities is correct.