LIGHTACE ENERGY GROUP
...affordable energy for everyday consumption







- CORE-VALUES
- CORE-SERVICES
- PARTNERSHIP
- COMMITMENTS
- DUE DILIGENCE
- NON-COMPLIANCE
- SUSTAINABILITY / WORKING POLICIES
- CONSEQUENCES
- APPENDIX

ABOUT US

We are LIGHTACE ENERGY GROUP, Companies registered and Incorporated in CANADA as - LIGHTACE DEVELOPMENT AND ENERGY PARTNERSHIP LIMITED, and also in Africa as - LIGHTACE ENERGY LIMITED, Nigeria.

LIGHTACE ENERGY GROUP is primarily focused on providing affordable energy sources for everyday consumption of the populace, driven by our marketing policies, compelling infrastructures; enhancement of valuable human resources skills, and profiteering through sales; out-sourcing and equitable distribution of broad varieties for affordable energy mining products.

We have a number of clientele drawn from different parts of the globe; most of which are in search for affordable energy - both in the Crude-Oil (BLCO) upstream sectors, other petroleum product specifications in the mid-stream and downstream sectors respectively.

We are always in earnest anticipation that our high-valued suppliers, drawn from selected refineries around the globe; as well as valued clients shall share our commitment to ethical, safe and responsible business practices; which are in consonance with the OPEC and ASIA-PACIFIC OCEANEERING regulations and compliances; that are feasible.

We leverage our business relationships both as a company and via business organizations, and promote dialogue with other stakeholders to advance these commitments and industry best practice.

CORE-SERVICES

Our Core-Services, spans across:

- OIL & GAS (DISTRIBUTION/SUPPLY)
- ENGINEERING CONSTRUCTION
- SHIPPING LOGISTICS
- OCEAN ENGINEERING
- WELDING YARD
- CORPORATE MARINE SOLUTONS

CORE-VALUES

- Empathy.
- Diligence.
- Community Service
- Integrity.
- Commitment.
- Excellent Client Service
- Empathy.
- Diligence.
- Community Service
- Integrity.
- Commitment.

Our Partnership & Commitment.

LIGHTACE ENERGY GROUP garners its' core-values and resilience from the existential assets placed on her corporate relationship with its' high-valued suppliers, and distributorships.

We set requirements and expectations for our suppliers to ensure that they share our commitment to responsible sourcing of the highest quality.

We require our suppliers, when working with LIGHTACE ENERGY GROUP, to act in a manner consistent with our Conglomerates Supplier-chain Codes of Conduct. Also, we encourage our suppliers (refineries, assigned vendors), and distributors to set expectations for their own supply-chain that align with our Supplier Codes of Conduct.



Support for Suppliers & Distributors...

LIGHTACE ENERGY GROUP always creates professional framework for managing the requirements and expectations of both its suppliers, distributors, collectively referred to as; our highly-valuable clients.

We strive to make contributions to communities within our eco-system wherever we operate, by providing employment opportunities, affiliate networking platforms; which forms part of the building bricks for supporting local businesses.

Our procurement strategies are developed locally to reflect the diverse environments in which we operate. We work with local suppliers/ distributors in the context of these procurement strategies to communicate our expectations and build understanding of our requirements.

We have a comprehensive framework and action plan for identifying and managing the key risks associated with our suppliers/distributors, from supplier due-diligence, selection, on-boarding and monitoring, through to disengagement.

We allocate appropriate resources and assign clear roles, responsibilities and accountabilities within LIGHTACE ENERGY GROUP to implement this framework.

We assess suppliers/distributors based on their risk and direct them to the most appropriate due diligence and management process for their risk level.

DUE-DILIGENCE

Our due diligence processes address suppliers; and/or distributorships risks that may be associated with the appropriate legal compliance, Anti-Money Laundering Compliances, abuse of human rights such as: equality, non-discrimination and diversity; respect for workers' rights of freedom of association, modern slavery, child labour, health and safety, environmental impacts, and where applicable, risks associated with Annex II of the OECD Guidance.

We use a variety of tools to assist us in our due diligence processes, which may include: on-site inspections, third-party verification, obtaining information from third-party sources including authorities, international organizations and civil society, and consulting experts and technical literature.

Our Supplier Codes of Conduct is incorporated by reference into all our supplier contracts. We communicate our requirements and expectations to all suppliers. Using a risk-based approach; we conduct training for certain suppliers.

Where we find instances of non-compliance with the Suppliers / Distributorship Codes of Conduct, we investigate these incidents to understand causes and contributing factors, and we take appropriate action accordingly. We collaborate with our suppliers and relevant stakeholders to address the deficiencies identified and mitigate identified actual or potential adverse impacts as appropriate.

However, where we find that a suppliers/distributors cannot, or will not take actions to demonstrate compliance within an agreed time-frame, we may review our continuing relationship with that supplier/distributor, up to; and including termination of engagement.

NON-COMPLIANCE

With regards to instances of non-compliance by any of our suppliers (refineries), or distributors of crude oil, fuels; and other petroleum products with the risks identified in Annex II of the OECD Guidance, we comply with the mitigation and termination requirements defined in Annex II of the OECD Guidance.

In the event that we identify that we have caused or contributed to an adverse impact on human rights in our supply-chain, we will provide for, or cooperate in, processes to enable an appropriate remedy.

We implement assurance processes to monitor compliance with our supplier-risk management framework.

We publicly communicate on how we implement our supplier due-diligence obligations including on modern slavery, child labour and conflict minerals, via regulatory reporting and our annual public disclosures.

We train our employees and contractors who are involved in procurement, purchasing, sales, trading, contracting, contract management and other relevant functions, on our supplier risk management framework.

We make available anonymous channels to our suppliers/distributors in order that they can raise concerns regarding compliance with the Supplier Codes of conducts; and we are always committed to working through the standard and required mandates of our highly-qualified professional HSE Department; in accordance with the HSEC Social Performance Standards which shall be applicable.

WORKING POLICY

We are each responsible for ensuring that we meet our commitments.

We expect our employees and contractors, or affiliate network associates to constructively bring to our attention; and/or raise concerns about possible breaches of our Suppliers/Distributors Codes of Conduct and its' working policy within our management crew members - managers, supervisors or via other available reporting channels. Our suggestion box platforms are available to employees, contractors and external parties. **LIGHTACE ENERGY GROUP** takes concerns seriously and handles them promptly.

LIGHTACE ENERGY GROUP has zero tolerance for retaliation against anyone who speaks constructively about conducts they believe is unethical, illegal or not in line with the **LIGHTACE ENERGY GROUP** Core-Values, Codes of Conduct; and/or working policies, even if the concern isn't substantiated, as long as they have not knowingly made a false report.

Consequently, for our suppliers (refineries)/ distributors of Petroleum Products; our working policies further substantiates into broader-based codes of conduct, and due-diligence in accordance with the 5-Step due-diligence framework defined in Annex I of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals/Petroleum Products from Conflict-Affected and High-Risk Areas 3rd Edition ('the OECD Guidance'). We expatriate on our requirements for suppliers from time to time.

CONSEQUENCES

Our working policies support our Core-Values and **LIGHTACE ENERGY GROUP** Codes of Conduct and reflect what is important to us. **LIGHTACE ENERGY GROUP** takes breaches of our working policies seriously. Depending on the severity of the breach, consequences may range from a warning to termination of employment/supply-chain agreements.

A supplier/distributor is any individual, entity or organization that provides, sells or leases materials, products or services directly to **LIGHTACE ENERGY GROUP**; and/or any of our wholly-owned corporate subsidiary Companies globally.

Our working policies applies to all our permanent Employees, temp-workers, Network-Affiliates, Accredited or Contracted Vendors; Directors and Officers, as well as contractors/distributors under the auspices of **LIGHTACE ENERGY GROUP** direct supervision, working for; and/or from any of our registered offices or industrial asset directly or indirectly controlled or operated by **LIGHTACE GLOBAL INC. AND ASSOCIATES t/a LIGHTACE ENERGY GROUP.**

We assert our influence/(s) over all our official joint-venturers. However, **LIGHTACE ENERGY GROUP** shall not control; nor operate to encourage any of our "joint-venture partners" to act in a manner that is inconsistent with the intents, and core-values/strengths of our working policies, without applying our direct consequence management tools to rectify such anomaly.

Appendix

ADDITIONAL OECD-ALIGNED REQUIREMENTS FOR SUPPLIERS/ DISTRIBUTORS OF CRUDE-OIL, REFINED PETROLUEM PRODUCTS AND MINERALS.

LIGHTACE ENERGY GROUP recognizes the risks of significant adverse impacts which may be associated with the extraction, trading, handling, and exporting of minerals; and/or refined crude-oil, and wider ranges of petroleum products from conflict-affected and high-risk areas.

LIGHTACE ENERGY GROUP recognizes that we have a responsibility to respect human rights and not contribute to conflict. We are committed to responsible sourcing of all our products; and we do not engage in any action which contributes to the financing of any conflict zone.

LIGHTACE ENERGY GROUP conducts risk-based due-diligence aligned with the 5-Step due-diligence framework defined in Annex I of the OECD Guidance; while sourcing from, or operating in, conflict-affected and high-risk areas, we will neither tolerate nor profit from, contribute to, assist or facilitate the commission by any party, of any of the risks associated with the extraction, transport or trade of minerals/Crude Oil/ Refined Petroleum Products specified in Annex II of the OECD Guidance. These include but are not limited to the following.

REGARDING SERIOUS ABUSES ASSOCIATED WITH THE EXTRACTION, TRANSPORT OR TRADE OF MINERALS/CRUDE-OIL.

- Any forms of torture, cruel, inhuman and degrading treatment;
- Any forms of forced or compulsory labour (which means work or service which is extracted from any person under the menace of penalty, and for which said person has not offered themself voluntarily);
- Any form of modern slavery, including forced labour and child labour (as defined by the International Labour Organization) in their operations;
- Employment to anyone under the national minimum legal age for employment;
- Other gross human rights violations and abuses such as widespread sexual violence;
- War crimes or other violations of international humanitarian law, crimes against humanity or genocide.

LIGHTACE ENERGY GROUP will immediately suspend or discontinue engagement with suppliers (refineries)/distributors where we identify a reasonable risk that they are committing, and/or are sourcing from; or are linked to any party committing these abuses.

We shall always comply with relevant United Nations sanctions resolutions or; where applicable, domestic laws implementing such United Nations related; and/or guided resolutions.

DIRECT OR INDIRECT SUPPORT TO NON-STATE ARMED GROUPS.

LIGHTACE ENERGY GROUP do not directly or indirectly support non-state armed groups, through the extraction, transport, distribution, trade, handling or export of minerals/Crude-Oil/Refined Petroleum Products.

We will immediately suspend or discontinue engagement with suppliers/distributors where we identify a reasonable risk that they are sourcing from, or linked to; any party providing direct or indirect support to non-state armed groups. 'Direct or indirect support' to non-state armed groups through the extraction, transport, distribution, trade, handling or export of minerals/refined petroleum products includes, but is not limited to, procuring minerals/crude-oil from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:

i) illegally control mine / refinery sites or otherwise control the distribution and transportation routes, points where minerals/ crude-oils are traded and upstream actors in the supply chain; and/or
ii) illegally tax or extort money or minerals/crude-oil at points of access to mine/refinery sites, along transportation/distribution routes or at points where minerals/petroleum products are traded; and/or
iii) illegally tax or extort intermediaries, export companies or international traders.

REGARDING PUBLIC OR PRIVATE SECURITY FORCES

LIGHTACE ENERGY GROUP do not provide direct or indirect support to public or private security forces who illegally control mine/refinery sites, transportation/distribution routes and upstream actors in the supply chain; illegally tax or extort money or minerals/refineries at point of access to mine/refinery sites, along transportation routes or at points where minerals/petroluem products are traded; or illegally tax or extort intermediaries, export companies or international traders.

Where **LIGHTACE ENERGY GROUP**; and/or our suppliers/distributors contract public or private security forces, we require that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights. In particular, we take steps and require that our suppliers/distributors to take steps, to adopt screening working policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.

Where we identify that a reasonable risk exists, we will immediately devise, adopt and implement a risk management plan with suppliers to prevent or mitigate the risk of direct or indirect support to public or private security forces engaged in the abuses identified above. In such cases, we will suspend or discontinue engagement with suppliers of minerals/petroleum products after failed attempts at mitigation within six months from the adoption of the risk management plan.

REGARDING BRIBERY AND FRAUDULENT MISREPRESENTATION OF THE ORIGIN OF MINERALS/REFINED CRUDE-OIL PRODUCTS.

LIGHTACE ENERGY GROUP do not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of minerals/refined crude-oil products, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport, distribution and export of minerals/petroleum products.

Where we identify that a reasonable risk of bribery or fraudulent misrepresentation of the origin of minerals exists, we commit to engage with suppliers of metals and minerals to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measurable steps taken in reasonable timescales.

We will suspend or discontinue engagement with suppliers and distributors of minerals/refined-petroleum products after failed attempts at mitigation.

Where we identify that a reasonable risk of money laundering exists, we commit to engage with suppliers/distributors of minerals/refined-crude-oil to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measurable steps taken in reasonable timescales. We will suspend or discontinue engagement with suppliers of minerals/refined crude-oil after failed attempts at mitigation.

REGARDING THE PAYMENT OF TAXES, FEES AND ROYALTIES DUE TO GOVERNMENTS:

In accordance with our Human Rights Policy, we ensure that all taxes, fees, and royalties related to mineral/crude-oil extraction, trade, distribution and export from conflict-affected and high-risk areas are paid to governments; and we disclose such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI).

REGARDING MONEY LAUNDERING

We support efforts and contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport, distribution or export of minerals/refined petroleum products derived from the illegal taxation or extortion of minerals/crude-oil at points of access to mine/refinery sites, along transportation routes; and/or at points where minerals/refined petroleum products are traded by upstream, midstream; and/or downstream suppliers (refineries)/distributors.

Additional resources

INTERNAL

- Our Mission
- Our Vision
- Our Core-Values
- Our Core-Services
- Codes of Conduct (Suppliers)
- Anti-Corruption Policy
- Anti-Money Laundering Policy
- Human Rights Policy
- Social Performance Policy
- Responsible Sourcing Policy
- HSEC Social Performance Standard

EXTERNAL

- Extractive Industry Transparency Initiative
- ILO Declaration on Fundamental Principles and Rights at Work
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas 3rd Edition
- Paris Agreement Under the UN Framework Convention on Climate Change
- UN Sustainable Development Goals
- UN Global Compact
- UN Guiding Principles on Business and Human Rights
- UN Universal Declaration of Human Rights Voluntary Principles on Security and Human Rights

Our Mission

"To create, deploy and maintain world-class business solutions founded on global best practices through dynamic, aggressive and creative market place, innovations that will deliver superior customer service, and significantly add value to our client's businesses; sustain growth in earnings for our shareholders, improve the quality of life of our staff and contribute immensely to the community in which we transact business."

Our Vision

To be the best we can.

Flexible, yet resolute; and rigid in maintaining our codes of conduct, standards, working policies and regulatory requirements,by providing best technologies, human development skills and trend-like corporate principles.

We pride ourselves in ultimately "Building a Nation of Healthy Entrepreneurial Mindsets and Vices, in measuring up with international standards, and for eminent benefits of humanity across the globe.

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This Core-Values, Core-Services; and Working Policy Documents has been approved by:
The Chairman, Board of Trustees; and
Board of Directors of LIGHTACE GLOBAL INC. t/a LIGHTACE ENERGY GROUP.

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