

FITC ENERGY GROUP

Est. 2024

COMPLIANCE PACKAGE

Crude Oil, Petroleum & Gas Trading | Global Operations

What's Inside This Package

A complete compliance framework for global energy trading operations.

01

About FITC Energy Group

Entity overview, mission & values

02

Code of Conduct

Ethics, integrity & employee standards

03

Anti-Bribery & Corruption

Zero-tolerance policy & controls

04

HSE Policy

Health, safety & environmental standards

05

Data Protection & Privacy

GDPR, Kenya DPA & data governance

06

Trading Compliance Framework

Crude oil, petroleum & gas trading rules

07

Corporate Governance

Structure, accountability & oversight

08

Reporting & Whistleblowing

Ethics hotline & non-retaliation pledge

FITC Energy Group

Global Energy Trading & Distribution

ENTITY

FITC Energy Group

FOUNDED

2024

SECTOR

Crude Oil, Petroleum & Gas Trading

OPERATIONS

International / Global

HQ

Nairobi, Kenya

COMPLIANCE

ISO 45001 | GDPR | Kenya DPA | FCPA

Our Ethical Standards

Governing the conduct of every employee, officer and representative worldwide

Integrity

We act honestly and transparently in all dealings — internal and external.

Accountability

We own our decisions and their consequences, holding ourselves to the highest standard.

Fair Competition

We compete vigorously but lawfully, rejecting anti-competitive practices in all forms.

Confidentiality

We protect proprietary and personal data from unauthorised disclosure at all times.

Human Rights

We uphold labour standards and human rights across all operations and supply chains.

Non-Retaliation

We protect whistleblowers and those who report concerns in good faith.

Zero-Tolerance Policy

FITC Energy Group prohibits bribery and corrupt practices in every jurisdiction without exception.

PROHIBITED CONDUCT

- ✗ Offering or paying bribes
- ✗ Receiving or soliciting bribes
- ✗ Facilitation payments
- ✗ Using intermediaries to bribe
- ✗ Political contributions

**ZERO
TOLERANCE**

OUR CONTROLS

- ✓ Third-party due diligence
- ✓ Gifts & hospitality register
- ✓ Financial controls & audit trail
- ✓ Mandatory ABC training
- ✓ Hotline for anonymous reports

Zero Harm. Zero Compromise.

Our HSE commitment applies to every site, every operation, every day.

GOAL

Zero Harm

No fatalities, no serious injuries, no significant environmental incidents.

STANDARD

ISO 45001 : 2015

Occupational health & safety management system aligned to international standards.

PROCESS

Risk-First Approach

HAZID/HAZOP assessments mandatory for all new projects and operational changes.

RESPONSE

24-Hour ERP

Emergency Response Plans rehearsed bi-annually across all operational sites.

ENVIRONMENT

Net-Zero Roadmap

Routine flaring elimination by 2027; annual carbon footprint tracking.

REPORTING

Transparent Incidents

All incidents — including near-misses — reported, investigated, and shared.

Data Privacy Framework

Compliant with Kenya Data Protection Act 2019, EU/UK GDPR, and all applicable privacy laws.

THE 7 PRINCIPLES

- 1 Lawfulness & Transparency
- 2 Purpose Limitation
- 3 Data Minimisation
- 4 Accuracy
- 5 Storage Limitation
- 6 Security & Integrity
- 7 Accountability

DATA SUBJECT RIGHTS

- › Access — receive a copy of your data
- › Rectification — correct inaccurate data
- › Erasure — request deletion
- › Restriction — limit processing
- › Portability — receive data in machine-readable format
- › Object — to processing for marketing or legitimate interests

Requests: | Response: 30 days

Crude Oil, Petroleum & Gas Trading Framework

Regulatory compliance standards for all trading activities.

KYC / AML

Full Know Your Customer and Anti-Money Laundering screening on all counterparties before trade execution.

Contract Standards

All agreements governed by ISDA, AIPN, or equivalent internationally recognised frameworks.

Market Conduct

No market manipulation, insider trading, or price-fixing. All pricing referenced to published benchmarks (Platts / Argus).

Sanctions Screening

All trades screened against OFAC, UN, EU, and UK sanctions lists before contract signing.

Trade Documentation

Bill of Lading, Certificate of Origin, Inspection Reports, and LC documentation maintained per trade.

Reporting

Material trades reported to relevant regulatory authorities in jurisdictions of operation.

Governance & Accountability



Speak Up. We Listen.

FITC Energy Group is committed to a culture of openness and protection for all reporters.

ETHICS HOTLINE

ethics@fitc-energy.com

Available 24/7 to all employees,
contractors and third parties

COMPLIANCE OFFICER

Direct Reporting

Confidential meetings available on
request at any time

ANONYMOUS PORTAL

Online Whistleblowing Tool

Submit reports without revealing your
identity — fully protected

NON-RETALIATION PLEDGE

FITC Energy Group strictly prohibits retaliation against any person who reports a concern in good faith. Any act of retaliation constitutes gross misconduct and will be subject to immediate disciplinary action.

Applicable Laws & Standards

ANTI-CORRUPTION

- › Kenya Anti-Corruption & Economic Crimes Act
- › UK Bribery Act 2010
- › US Foreign Corrupt Practices Act (FCPA)
- › AU Criminal Code Act

DATA PROTECTION

- › Kenya Data Protection Act 2019
- › EU General Data Protection Regulation (GDPR)
- › UK GDPR & Data Protection Act 2018
- › ODPC Guidelines (Kenya)

TRADE & SANCTIONS

- › OFAC Sanctions (US)
- › UN Security Council Sanctions
- › EU Restrictive Measures
- › UK OFSI Sanctions

ENERGY & HSE

- › Kenya EMCA (Environmental Management)
- › NEMA Environmental Guidelines
- › ISO 45001:2018 (OH&S)
- › ISO 14001:2015 (Environment)

Compliance Training Programme

All personnel are required to complete mandatory compliance training at onboarding and annually.

AUDIENCE	TRAINING MODULE	FREQUENCY	COMPLETION TARGET
ALL STAFF	Code of Conduct	Onboarding + Annual	100%
ALL STAFF	Anti-Bribery & Corruption	Onboarding + Annual	100%
ALL STAFF	Data Protection & Privacy	Onboarding + Annual	100%
SITE PERSONNEL	HSE Induction	Before site access	100%
TRADING / FINANCE	Sanctions & KYC	Onboarding + Biannual	100%
MANAGERS & OFFICERS	Corporate Governance	Annual	100%

Annual Compliance Schedule

Q1 (JAN–MAR)

- Code of Conduct training rollout
- Annual ABC refresher
- Q4 compliance report to Board

Q2 (APR–JUN)

- KYC / sanctions screening review
- HSE site inspections
- Data Protection audit

Q3 (JUL–SEP)

- Mid-year risk assessment
- Third-party due diligence reviews
- HSE emergency drill #1

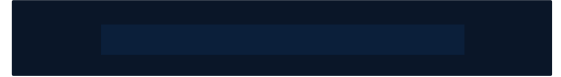
Q4 (OCT–DEC)

- Annual policy review cycle
- HSE emergency drill #2
- Annual compliance report preparation

Compliance Contacts & Resources

Chief Compliance Officer

Oversight of all compliance matters, policy interpretation, regulatory liaison



Data Protection Officer

Personal data, privacy rights, data breaches, GDPR/DPA queries



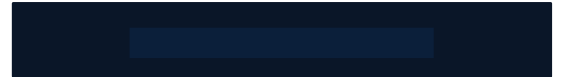
HSE Director

Safety incidents, environmental concerns, HSE risk assessments



Ethics Hotline

Anonymous or confidential concerns — open 24/7 to all stakeholders



FITC ENERGY GROUP

Compliance Package | Version 1.0 | Effective 1 January 2025

"Our commitment to compliance is not a constraint on how we do business — it is the foundation of how we do business."

— Board of Directors, FITC Energy Group