

**AVEDA TRANSPORTATION AND ENERGY SERVICES INC.
CODE OF BUSINESS CONDUCT & ETHICS SUMMARY**

May 31, 2016

One of the goals of Aveda Transportation and Energy Services Inc. including its subsidiary Companies, (collectively the "**Corporation**") is to conduct our business with the highest standard of professional and ethical conduct. This is achieved through honesty and integrity in all of our business dealings. By simply maintaining this standard, the Corporation will be viewed favourably by all who are associated with us, from shareholders to suppliers to industry competitors.

We have hired staff that share this standard and will hire future employees based on the same basis. I value and respect the collective integrity of the team that we have assembled and thank-you for your efforts to date.

Often less is more, and in this instance it can be distilled down to common sense. Simply apply it and when unsure about a particular situation ask a manager, officer or director of the Corporation for guidance.

Please read through the attached material to ensure that our vision on business conduct and ethics are honoured and aligned.

In summary (read the corresponding sections for more detail):

- I. Act with honesty and integrity in all business dealings
- II. Always avoid conflicts of interests
- III. Opportunities that arise through the Corporation or through use of the Corporation assets are for the Corporation and not for personal gain
- IV. Confidentiality of information should be maintained at all times
- V. Protect and ensure efficient and legal use of the Corporation's assets
- VI. No insider trading, all employees will be advised by email when a trading "*blackout*" period is in place
- VII. Deal fairly with all suppliers, competitors and employees
- VIII. Comply with all laws, rules and regulations
- IX. Comply with the *Competition Act*
- X. Comply with all environmental policies, laws and regulations
- XI. No discrimination or harassment of any kind
- XII. Comply with all health and safety policies, rules and practices

- XIII. Maintain honest, accurate records and report such information honestly and accurately
- XIV. Use the Corporation email for the appropriate exchange of information and avoid flooding the system with non-relevant correspondence
- XV. The Corporation will not make political contributions
- XVI. Business gifts and entertainment for networking and to create goodwill are acceptable at nominal levels as long as it does not create an obligation or the perception of an obligation
- XVII. No direct or indirect payments to domestic or foreign officials
- XVIII. Report all illegal or unethical behavior
- XIX. Use common sense and when in doubt ask a manager, officer or director for guidance.

I appreciate the efforts of each and every employee in ensuring that we individually and collectively act in a professional and ethical way through honesty and integrity in all of our business dealings.

A handwritten signature in blue ink that reads "Ronnie Witherspoon Jr." in a cursive script.

Ronnie Witherspoon
President & CEO
Aveda Transportation and Energy Services Inc.