

Code of Ethics

TRILOMA ENERGY ADVISORS, LLC
TRILOMA SECURITIES, LLC

October 15, 2015

Version 2.2

Triloma

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A. Background

Triloma Energy Advisors, LLC (the “Adviser”) is registered with the U.S. Securities and Exchange Commission as a registered investment adviser and serves as the adviser and administrator to Triloma EIG Energy Income Fund and Triloma EIG Energy Income Fund - Term I (collectively referred to as the “Funds”). The Funds are the Adviser’s only clients and reference may be made to them throughout as either the clients or the Funds.

Triloma Securities, LLC (the “Broker-Dealer”) is a registered broker dealer and member of FINRA. The Broker-Dealer serves as a Dealer Manager for select public and private securities offerings by syndicates. Triloma Securities serves as the Dealer Manager for the Funds.

Triloma Energy Advisors, LLC and Triloma Securities, LLC are affiliated entities and wholly owned subsidiaries of Triloma Financial Group. The application of these procedures may be modified to conform to certain regulatory requirements relative to each respective entity.

This version 2.2 of the Code is effective as of October 15, 2015. The prior version, 2.1, was effective through October 14, 2015.

B. Standards of Conduct

Triloma Standards

This Code of Ethics (the “Code”) applies to all officers, principals, investment adviser representatives and employees of Triloma Energy Advisors, LLC and all officers, principals, registered representatives and employees of Triloma Securities, LLC.

The officers, principals, employees, investment adviser representatives and registered representatives of the Adviser and the Broker-Dealer (collectively referred to as “Triloma”) are responsible for maintaining the highest ethical standards and conducting business with the highest level of integrity.

If you have a question or concern about what is proper conduct for you or anyone else, please raise these concerns with the Adviser’s Chief Compliance Officer or the Broker-Dealer’s Chief Compliance Officer.

Defined terms are found in Exhibit A of the Code.

Raising Concerns, Reporting Violations and Complaint Handling

Triloma encourages open communication and acknowledges its importance as a fundamental component of the Code of Ethics program. Accordingly, Triloma prohibits retaliation against individuals that have reported on 1) the misconduct of others, 2) Triloma matters; or 3) assisted in an investigation of challenged practices, where the reports are made in good faith.

If you know of, or reasonably believe there is a violation of this Code, you must report that information immediately to the Chief Compliance Officer of the Adviser or the Chief Compliance Officer of the Broker-Dealer. You should not conduct preliminary investigations unless authorized to do so by the Compliance Department of either entity. Current contact information for each Chief Compliance Officer can be found in Exhibit B and Exhibit C.

Anyone who raises an issue in good faith regarding a possible violation of law, regulation or company policy or any suspected illegal or unethical behavior will be protected from retaliation.

Standards Specific to the Adviser

All officers, principals, investment adviser representatives and employees of the Adviser will be referred to as “Access Persons.”

Access Persons shall not engage, directly or indirectly, in any business transaction or arrangement for personal profit that is not in the best interests of Adviser or its clients. The Adviser owes its clients a duty of undivided loyalty. The Adviser has a fiduciary responsibility to its clients, and the clients’ interest must always be placed first.

This Code has been adopted by the Adviser and is subject to approval by the Board of Trustees of the Funds in accordance with Rule 17j-1(c) under the 1940 Act and Rule 204A-1 under the Advisers Act. Rule 204A-1 of the Advisers Act requires that all Adviser personnel comply with all applicable federal securities laws. The definitions for capitalized terms used throughout this Code, when not defined, are included as Exhibit A.

Standards Specific to the Broker-Dealer

All officers, principals, registered representatives and employees of the Broker-Dealer will be referred to as “Covered Persons.”

FINRA Rule 2010 states that members shall observe high standards of commercial honor and just and equitable principles of trade in the conduct of its business.

FINRA Rule 3110(d) requires broker-dealers to have supervisory processes in place that are reasonably designed to identify trades that may violate insider trading rules and may be manipulative and/or deceptive. All Covered Persons under this Code are subject to FINRA Rule 2010 and FINRA Rule 3110(d) and other securities laws applicable to associated persons of registered broker-dealers.

C. Insider Trading Considerations

In the course of your activities with Triloma, you may receive information about Triloma, its clients, its business partners, or other parties, that for various reasons must be treated as confidential. With respect to these parties, you are not permitted to divulge material non-public information (“MNPI”) to another person where the communication leads to, or is intended to lead to, a purchase or sale of securities of such party. This is known as “insider trading.” You must comply with measures in place to preserve the confidentiality of any information you receive. Any person who provides MNPI to a person who is not authorized to have the information (also known as “tipping”) is also liable. Employees who possess MNPI about an issuer of securities (whether that issuer is the Company, another company, a client or supplier, any fund or other issuer) must not trade in that issuer’s securities, either for their own accounts or for any account over which they exercise investment discretion or a Beneficial Interest.

For more information on Insider Trading, please refer to Exhibit D.

Personal Investing

Rule 204A-1 of the Advisers Act requires all Access Persons of an investment adviser registered with the SEC to report their personal securities transactions and holdings periodically. Additionally, the investment adviser is required to review these personal transaction and holdings. Examples of these reports are included as Exhibit H of the Code.

The Broker-Dealer’s Written Supervisory Procedures require all registered representatives to receive prior approval before opening and/or maintaining an outside brokerage account. It also requires that the Broker-Dealer receive duplicate trade confirmations and statements.

Trading Guidelines for Personal Investing

Triloma has developed the following two (2) trading categories to help monitor its obligations to ensure that Covered Persons and Access Persons do not violate the Code. All Access Persons and Covered Persons will be notified in writing about the category that applies to their personal investing and trading activities.

The CCO of the Adviser and the CCO of the Broker-Dealer (or their designee) will maintain a list of each level of reporting requirements for Access Persons and Covered Persons. Each CCO will promptly notify any new Access Person or Covered Person of their responsibilities under the Code. In certain circumstances, the CCO of the Broker-Dealer and/or the Adviser may also inform individuals in writing that they are unable to trade or will be required to pre-clear certain transactions or change their category under the Code.

Individuals subject to the Code are categorized as either Level 1 Access Persons and Covered Persons or Level 2 Covered Persons. These individuals will be subject to the applicable trading guidelines as outlined below.

Level 1 Access Persons and Covered Persons: Trading Guidelines

Who is a Level 1 Access Person in the Adviser?

All officers, principals, investment adviser representatives and employees of Triloma Energy Advisors, LLC are Level 1 Access Persons under the Code.

Who is a Level 1 Covered Person in the Broker-Dealer?

All officers, principals, representatives and employees that have received notification in writing from the Broker-Dealer CCO are Level 1 Covered Persons. These individuals are categorized as Level 1 based upon the support or services that they provide to Triloma Energy Advisors, LLC.

What are the Level 1 Personal Investing and Trading Guidelines?

Level 1 Access Persons and Covered Persons must refer to the following with respect to personal trading and investing:

1. Restricted Securities List
At a minimum, the Restricted Security List shall include any investment held by the Adviser's clients (i.e. the Funds) and any Initial Public Offerings (IPO), Limited or Private Offerings that are in the energy, oil and gas sector. All Level 1 Access Persons and Covered Persons shall be notified of any additional Restricted Securities by and upon determination of the CCO.
2. Pre-Clearance List
Level 1 Access Persons and Covered Persons must receive written pre-clearance of purchases and sales in each of the following securities and transactions:
 - Hedge Funds, Private Placements and any other Limited Offerings;
 - Exchange Traded Products; and
 - Closed End Funds

Level 1 Covered Persons should note that the Broker-Dealer CCO will need to determine whether or not the investment in these securities falls within FINRA Rule 3040 requiring broker-dealers to provide written pre-authorization for private securities transaction.

Level 2 Covered Persons: Trading Guidelines

Who is a Level 2 Covered Person in the Adviser?

There are no Level 2 Covered Persons in the Adviser.

Who is a Level 2 Covered Person in the Broker-Dealer?

All registered representatives and employees of Triloma Securities, LLC are Level 2 Covered Persons unless they have received written notification that they are categorized as Level 1 Covered Persons under the Code.

What are the Level 2 Covered Persons Personal Investing and Trading Guidelines?

Level 2 Covered Persons may execute transactions in securities on the Restricted List and/or Pre-Clearance List as long as they comply with applicable Insider Trading rules and regulations. Level 2 Covered Persons are strongly advised to refrain from executing transactions in securities that may provide the appearance that the Level 2 Covered Person is in receipt of MNPI. Level 2 Covered Persons will be required to provide an attestation of compliance with Insider Trading rules and regulations within seven (7) days of executing a transaction in a security on the Restricted and/or Pre-Clearance List.

A summary of these guidelines can be found in Exhibit E of the Code.

Trading Prohibitions

Access Persons and Covered Persons, regardless of category, may not under any circumstances participate in the following transactions:

- any initial public offering (IPO)

Access Persons and Covered Persons, regardless of category, may not participate in the following transactions without prior approval from the Adviser and/or Broker-Dealer CCO:

- any hedge fund, private equity, private placement or other unlisted investment
- any closed-end fund not affiliated with Triloma.

Reporting Guidelines

How do I report my personal investments and trading?

Level 1 Access Persons and Covered Persons and Level 2 Covered Persons must comply with the reporting guidelines of the Code. These guidelines are found below.

For Level 1 Access Persons Only

In order for the Adviser to determine with reasonable assurance whether this Code is being observed by its Access Persons, the following reporting requirements apply:

Initial Holdings Report.

Within 10 days after a person becomes an Access Person, he or she shall deliver an Initial Holdings Report in writing to the CCO, in a form acceptable to the CCO, of all direct or indirect Beneficial Ownership interests of such Access Person in Covered Securities. Information to be reported must be current as of a date no more than 45 days prior to an individual becoming an Access Person and is to include:

- The title, number of shares and principal amount of each Covered Security in which the Access Person had any direct or indirect Beneficial Ownership when the person became an Access Person;
- The name of any broker, dealer or bank with whom the Access Person maintained an account in which any securities were held for the direct or indirect benefit of the Access Person as of the date the person became an Access Person; and
- The date the report is submitted by the Access Person.

Quarterly Transaction Report.

Each Access Person shall deliver a Quarterly Transaction Report in writing to the CCO within 30 days of the end of each calendar quarter, in a form acceptable to the CCO, that includes any transaction during the quarter in a Covered Security in which the Access Person had any direct or indirect Beneficial Ownership:

- The date of the transaction, the title, the interest rate and maturity date (if applicable), the number of shares and the principal amount of each Covered Security involved;
- The nature of the transaction (i.e., purchase, sale or any other type of acquisition or disposition);
- The price of the Covered Security at which the transaction was effected;
- The name of the broker, dealer or bank with or through which the transaction was effected; and
- The date the report is submitted by the Access Person.

With respect to any account established by the Access Person in which any securities were held during the quarter for the direct or indirect benefit of the Access Person, the report shall also include:

- The name of the broker, dealer or bank with whom the Access Person established the account;
- The date the account was established; and
- The date the report is submitted by the Access Person.

Annual Holdings Report.

Each Access Person shall deliver an Annual Holdings Report in writing to the CCO no later than January 31 of each year, in a form acceptable to the CCO, that includes the following information, which must be current as of December 31 of the prior calendar year:

- The title, number of shares and principal amount of each Covered Security in which the Access Person had any direct or indirect beneficial ownership;
- The name of any broker, dealer or bank with whom the Access Person maintains an account in which any securities are held for the direct or indirect benefit of the Access Person; and
- The date the report is submitted by the Access Person.

It is the Adviser's policy that all Access Persons submit these reports to the CCO within the prescribed time periods, whether or not securities transactions have occurred in their accounts during the relevant period. Those Access Persons having no securities transaction to report must indicate this fact in his or her report. The report must then be dated, signed and submitted to the CCO for review.

In lieu of submitting Quarterly and Annual Holdings Reports, Level 1 Access Persons may arrange for the Adviser to receive duplicate statements and confirmations.

For Level 1 and Level 2 Covered Persons

Level 1 Covered Persons and Level 2 Covered Persons should receive prior approval before opening any brokerage account outside of the Broker-Dealer. Level 1 Covered Persons and Level 2 Covered Persons should also ensure that the Broker-Dealer receives duplicate confirmation and statements from the appropriate accounts.

Exceptions to the Reporting Requirements

The following reporting exceptions apply to all Access Persons and Covered Persons:

- An Access Person and/or Covered Person need not submit reports and/or duplicate statements and confirmations as required in the Code with respect to transactions in any account over which such person has no direct or indirect influence or control or Beneficial Interest;
- An Access Person need not make a Quarterly Transaction Report with respect to transactions effected pursuant to an automatic purchase plan or dividend reinvestment plan, which such plan had previously been provided to the CCO;
- An Access Person need not make a Quarterly Transaction Report if the report would duplicate information contained in broker trade confirmations or account statements received by the Adviser with respect to the Access Person provided such broker trade confirmations or account statements are received by the due date required for a Quarterly Transaction Report and broker trade confirmations or account statements contain all of the information required to be included in the Quarterly Transaction Report.

Additional Reporting Guidelines

These guidelines also apply to accounts and transactions in accounts or investments where the Access Person or Covered Person has a Beneficial Interest. This includes the following:

- Accounts/Investments of a spouse or domestic partner;
- Accounts/Investments of any child under the age of 21 regardless of household status;
- Accounts/Investments of any other family member residing in the same household; and
- Accounts/Investments of where the Access Person or Covered Person has a direct or indirect beneficial interest, including joint accounts, trustee accounts, partnerships, investment clubs or where the Access Person or Covered Person has trading authority and/or discretion.

Accounts that may only hold open-end mutual funds, 529 plans, 401k and ESOP accounts, variable annuities and variable insurance are not subject to any reporting requirements.

D. Consequences of Violating the Code

All violations of the Code will result in an appropriate corrective action, including but not limited to a letter of censure, further trading restrictions, and actions up to and including dismissal. If the violation involves potential criminal activity, the individual or individuals in question will be reported, as warranted, to the appropriate authorities.

Violations of this Code may result in reporting to various third parties, including, but not limited to FINRA and/or the Board of Trustees¹ and possible reporting under FINRA Rule 3110(d).

Penalties for trading on or communicating MNPI are severe, both for individuals involved in such conduct and their employers. A person can be subject to severe penalties even in the circumstance where he or she does not personally benefit from the violation. Penalties include jail sentences, civil injunction, treble damages, disgorgement of profit, fines for the employee and fines for the employer.

E. Records and Administration of the Code

Retention of Records

The Adviser and the Broker-Dealer will retain all documents as required by this Code, including all duplicate confirmations and any documents referred to or incorporated herein, as part of the books and records required by the Securities and Exchange Commission under the Adviser's Act, the Exchange Act and FINRA rules and regulations.

Annual Certification of Compliance

All Access Persons and Covered Persons are required to certify they have read and understand this Code and recognize they are subject to the provisions hereof and will comply with the policies and procedures upon initial employment. Further, all Access Persons and Covered Persons are required to certify annually that they have complied with the requirements of this Code and that they have reported all personal securities transactions required to be disclosed or reported pursuant to the requirements of such policies.

A copy of the Annual Certification may be found in Exhibit F and Exhibit G.

¹ The Board of Trustees currently serves the Adviser's only clients, the Funds.

Exhibit A: Definitions

1934 Act. 1934 Act is the Securities Exchange Act of 1934, as amended, referred to as the Exchange Act.

1940 Act. 1940 Act is the Investment Company Act of 1940, as amended.

Level 1 Access Person(s). Access Person(s) means:

All officers, principals, investment adviser representatives and employees of Triloma Energy Advisors, LLC.

Level 1 Covered Person(s).

All officers, principals, registered representatives and employees of the Dealer Manager who, in the ordinary course of business, makes, participates in or obtains information regarding an actual or potential purchase or sale of Covered Securities by the Fund or whose functions or duties in the ordinary course of business provide services to the Adviser.

Level 2 Covered Person(s).

All officers, principals, registered representatives and notified employees of the Dealer Manager that are not Level 1 Covered Persons.

Advisers Act. Advisers Act is the Investment Advisers Act of 1940, as amended.

Beneficial Ownership. Beneficial Ownership generally means any interest in a security for which an Access Person or any member of his or her immediate family sharing the same household can directly or indirectly receive a monetary (“pecuniary”) benefit. It shall be interpreted in the same manner as it would be under Rule 16a-1(a)(2) of the 1934 Act, in determining whether a person is the beneficial owner of a security for purposes of Section 16 of the 1934 Act and the rules and regulations thereunder, that, generally speaking, encompass those situations where the beneficial owner has the right to enjoy a direct or indirect economic benefit from the ownership of the security. A person is normally regarded as the beneficial owner of securities held in: (i) the name of his or her spouse, domestic partner, minor children, or other relatives living in his or her household; (ii) a trust, estate or other account in which he/she has a present or future interest in the income, principal or right to obtain title to the securities; or (iii) the name of another person or entity by reason of any contract, understanding, relationship, agreement or other arrangement whereby he or she obtains benefits substantially equivalent to those of ownership.

Covered Security. Covered Security means any Security, but excluding:

1. Direct obligations of the government of the United States;
2. Bankers’ acceptances, bank certificates of deposit, commercial paper and high quality short-term debt instruments, including repurchase agreements; and
3. Shares of open-end investment companies registered under the 1940 Act that are not advised by the Fund’s Investment Adviser and/or the Managing Dealer.

Initial Public Offering. Initial Public Offering or “IPO” means an offering of securities registered under the 1933 Act, the issuer of which, immediately before the registration, was not subject to the reporting requirements of Sections 13 or 15(d) of the 1934 Act.

Investment Adviser. Investment Adviser shall be defined in accordance with Section 2(20) of the 1940 Act.

Limited Offering. Limited Offering means an offering or a private placement of securities that is exempt from registration under the 1933 Act pursuant to Section 4(2) or Section 4(6) or pursuant to Rule 504, Rule 505 or Rule 506 under the 1933 Act.

Security. Security means a security as defined in Section 2(a)(9) of the 1940 Act, which includes: any note, stock, treasury stock, bond, debenture, evidence of indebtedness, certificate of interest or participation in any profit sharing agreement, collateral-Fund certificate, pre-organization certificate or subscription, transferable share, investment contract, voting-trust certificate, certificate of deposit for a security, fractional undivided interest in oil, gas or other mineral rights, any put, call, straddle, option or privilege on any security (including a certificate of deposit) or on any group or index of securities (including any interest therein or based on the value thereof), or any put, call, straddle, option or privilege entered into on a national securities exchange relating to foreign currency, shares of closed-end investment companies, shares of exchange traded funds (whether registered as open-end investment companies or as a unit investment trust), limited partnership interests, limited liability company interests and shares or debt instruments issued in Limited Offerings, or, in general, any interest or instrument commonly known as a “security,” or any certificate of interest or participation in, temporary or interim certificate for, receipt for, guaranty of, or warrant or right to subscribe to or purchase, any of the foregoing.

Security Held or to be Acquired by the Fund. Security Held or to be Acquired by the Funds means:

1. Any Covered Security that, within the most recent 15 days, has been held by the Funds or is being considered by the Funds or its Investment Adviser for purchase by the Fund; or
2. Any option to purchase or sell, and any security convertible into or exchangeable for, a Covered Security described in subparagraph (1) of this definition.

Exhibit B: Whistleblower Contact Information

Triloma Securities, LLC
Chief Compliance Officer
hnewsome@triloma.com
407-636-3801

Triloma Energy Advisors, LLC
Chief Compliance Officer
hnewsome@triloma.com
407-636-3801

While the Adviser and the Broker-Dealer encourage reporting concerns directly to Triloma, reporting persons can report directly to the SEC without retaliation.

If you have a concern or issue related to the Funds, please refer to the Funds' Whistleblower Policy for the respective Audit Committee's for each Fund and their contact information or you may find it on the Funds' website at www.trilomaenergy.com². Similar to the Adviser, the Funds' will protect a reporting person from threats of retaliation, discharge, or other types of discrimination including but not limited to compensation or terms and conditions of employment that are directly related to the disclosure of such reports.

² As of 7/27/15, the Funds' website is not live but scheduled for effectiveness in the near future.

Exhibit C: Raising Concerns, Reporting Violations and Complaint Handling

If you have questions or concerns about this Code or if you need to report violations or have a complaint, please contact the CCO of the respective entity.

Triloma Securities, LLC
Chief Compliance Officer
hnewsome@triloma.com
407-636-3801

Triloma Energy Advisors, LLC
Chief Compliance Officer
hnewsome@triloma.com
407-636-3801

You may email general inquiries to compliance@triloma.com.

Exhibit D: Additional Information on Insider Trading

What is Insider Trading?

Insider trading is the practice of buying or selling securities of any company, including when you are aware of material, non-public information about that company or its securities. If the information could affect the stock price or a reasonable investor's investment decisions, it is considered material. If the information has not been widely disseminated to the public through major newswire services, national news services or financial news services, it is considered non-public.

What are some examples of acceptable and unacceptable use?

a) EXAMPLE: *Acceptable*

The individual has a business need-to-know reason for accessing the information; and

You are confident that the individual receiving the material, non-public information won't share it inappropriately.

b) EXAMPLE: *Unacceptable*

Sharing inside information with another person who does not have a business need-to-know reason for accessing the information is known as tipping and is illegal. Your conduct may be illegal even if you do not benefit personally and the person you shared the inside information with does not buy or sell any related securities.

You should consult with your CCO to ensure that there is a legitimate business need to share this information.

What are the consequences of engaging in Insider Trading?

If you engage in insider trading or tipping, you can be subject to substantial civil and criminal penalties and disciplinary action, including termination of your employment.

Exhibit E: Summary of Personal Investing and Trading Rules by Classification

Policy Requirements	Level 1 Access Persons	Level 1 Covered Persons	Level 2 Covered Persons	Other Non-Classified Individuals
Initial Public Offerings	Pre-clearance	Restricted	Restricted	Consult with the CCO
Private Placements or Limited Offering	Pre-clearance	Pre-clearance	Pre-clearance	Consult with the CCO
Closed-End Funds	Pre-clearance	Pre-clearance	Pre-clearance	Consult with the CCO
Hedge Funds	Pre-clearance	Pre-clearance	Pre-clearance	Consult with the CCO
Restricted List Securities	Restricted	Restricted	Subject to Insider Trading Attestation	Consult with the CCO
Existing and Pending Fund Portfolio Holdings (should also be on the Restricted List)	Restricted	Restricted	Subject to Insider Trading Attestation	Consult with the CCO
Publicly Traded Energy Equity (not on the Restricted List)	Pre-clearance	Pre-clearance	Subject to Insider Trading Attestation	Consult with the CCO

Exhibit F: Certificate of Receipt of Code of Ethics for Triloma Energy Advisors, LLC

Pursuant to Triloma Energy Advisors, LLC's Code of Ethics (the "Code"), each access person must annually acknowledge his or her understanding of the Code.

PART 1: CODE OF ETHICS ATTESTATION Triloma Energy Advisors, LLC – Level 1 Access Persons

1. Triloma Energy Advisors, LLC's Code of Ethics has been provided to me for my review.
Yes ___ No ___
2. I agree that I have read or will read the Code, understand that I am subject to the Code, and further that I will comply with the requirements of the Code at all times during the course of my association with Triloma Energy Advisors, LLC.
Yes ___ No ___
3. I agree to promptly report any violation or potential violation of the Code that I am aware of to the Chief Compliance Officer. Further, I understand that violations that are reported in good faith are subject to the Firm's anti-retaliation policy.
Yes ___ No ___
4. I understand that a violation of the Code and/or a violation of federal and/or state securities laws will be grounds for, at a minimum, a disciplinary action.
Yes ___ No ___
5. I understand that I must immediately report all information that may be deemed "material and non-public" to the Chief Compliance Officer and I will not share that information with any other individual either inside or outside of Triloma.
Yes ___ No ___
6. I certify that I have submitted my initial, quarterly and annual holdings reports as required, and that I trade securities in my personal brokerage accounts in compliance with the Restricted List and Pre-Clearance List procedures outlined within the Code.
Yes ___ No ___

By submitting this form, I certify that all answers to this questionnaire are true and correct to the best of my knowledge.

Access Person Printed Name: _____

Signature: _____ **Date:** _____

Exhibit G: Certificate of Receipt of Code of Ethics for Triloma Securities, LLC

Pursuant to Triloma Securities, LLC's Code of Ethics (the "Code"), each covered person must annually acknowledge his or her understanding of the Code.

PART 1: CODE OF ETHICS ATTESTATION

Triloma Securities, LLC – Level 1 Covered Persons and Level 2 Covered Persons

1. Please confirm your status: Level 1 Covered Person Level 2 Covered Person
2. Triloma Securities, LLC's Code of Ethics has been provided to me for my review.
Yes No
3. I agree that I have read or will read the Code, understand that I am subject to the Code, and further that I will comply with the requirements of the Code at all times during the course of my association with Triloma Securities, LLC.
Yes No
4. I agree to promptly report any violation or potential violation of the Code that I am aware of to the Chief Compliance Officer. Further, I understand that violations that are reported in good faith are subject to the Firm's anti-retaliation policy.
Yes No
5. I understand that a violation of the Code and/or a violation of federal and/or state securities laws will be grounds for, at a minimum, a disciplinary action.
Yes No
6. I understand that I must immediately report all information that may be deemed "material and non-public" to the Chief Compliance Officer and I will not share that information with any other individual either inside or outside of Triloma.
Yes No
7. I certify that I have disclosed all outside brokerage accounts and that I trade securities in my personal brokerage accounts in compliance with the Restricted List and Pre-Clearance List procedures outlined within the Code.
Yes No

By submitting this form, I certify that all answers to this questionnaire are true and correct to the best of my knowledge.

Covered Person Printed Name: _____

Signature: _____ **Date:** _____

Exhibit H: Form of Initial Holdings Report, Quarterly Holdings Report and Annual Holdings Report for Triloma Energy Advisors, LLC

Triloma Energy Advisors, LLC Form of Initial Holdings Report

Name of Access Person: _____ Date: _____

Note: In lieu of completing this report, you may attach duplicate copies of your most recent brokerage or custodian statements provided they are current within 45 days of this report and sign below certifying that all required information has been provided.

1. Holdings

Name of Reportable Security	Type of Security	Ticker Symbol or CUSIP	Number of Shares or Principal Amount

2. Brokerage/Custody Accounts

Name of Institution and Account Holders' Name (i.e. you, spouse, child)	Account Number	Have you requested duplicate statements?

Signature of Access Person: _____

Reviewed By: _____

Signature of Chief Compliance Officer: _____

Date: _____

Triloma Energy Advisors, LLC
Form of Quarterly Transaction Report
 (Complete within 30 days of the ___ quarter of 20___)

Name of Access Person: _____ Date: _____

Note: In lieu of completing this report, you may attach duplicate copies of all of your brokerage or custodian statements for the quarter and sign below certifying that all required information has been provided.

1. Transactions in Reportable Securities (including Corporate Actions)

Name of Security	Ticker Symbol or CUSIP	Broker	Number of Shares/Principal Amount	Interest Rate & Maturity Date	Nature of Transaction (i.e. buy, sale)	Transaction Price	Date of Transaction

2. Transactions in Limited Offerings (Includes Private Placements, Hedge Funds, IPOs and Other Offerings Not Publicly Available)

Name of Security	Ticker Symbol or CUSIP	Broker	Number of Shares/Principal Amount	Interest Rate & Maturity Date	Nature of Transaction (i.e. buy, sale)	Transaction Price	Date of Transaction

3. Brokerage/Custody Accounts Opened During Quarter

Name of Institution and Account Holders' Name (i.e. you, spouse, child)	Account Number	Have you requested duplicate statements?

Signature of Access Person: _____

Reviewed By: _____

Signature of Chief Compliance Officer: _____

Date: _____

Triloma Energy Advisors, LLC
Form of Annual Holdings Report
(To be accurate within 45 days of submission)

Name of Access Person: _____ Date: _____

Note: In lieu of completing this report, you may attach duplicate copies of your most recent brokerage or custodian statements provided they are current within 45 days of the date of this report and sign below certifying that all required information has been provided.

1. Holdings

Name of Reportable Security	Type of security	Ticker Symbol or CUSIP	Number of Shares or Principal Amount

2. Brokerage/Custody Accounts

Name of Institution and Account Holders' Name (i.e. you, spouse, child)	Account Number	Have you requested duplicate statements?

I hereby certify that during the calendar year _____, I have complied with my obligations under the Personal Trading Policy as in effect during that period, including the obligations not to purchase or sell Publicly Traded Securities on the basis of “insider information” and to provide Triloma Energy Advisors with duplicate confirmations and quarterly reports reflecting all purchases and sales of Publicly Traded Securities for my Personal Accounts.

Signature of Access Person: _____

Reviewed By: _____

Signature of Chief Compliance Officer: _____

Date: _____

Exhibit I: Form of Initial Holdings Report for Triloma Securities, LLC

Triloma Securities, LLC Form of Initial Holdings Report

Name of Access Person or Covered Person: _____ Date: _____

Note: In lieu of completing this report, you may attach duplicate copies of your most recent brokerage or custodian statements provided they are current within 45 days of this report and sign below certifying that all required information has been provided.

1. Holdings

Name of Reportable Security	Type of Security	Ticker Symbol or CUSIP	Number of Shares or Principal Amount

2. Brokerage/Custody Accounts

Name of Institution and Account Holders' Name (i.e. you, spouse, child)	Account Number	Have you requested duplicate statements?

Signature of Access Person or Covered Person: _____

Reviewed By: _____

Signature of Chief Compliance Officer: _____

Date: _____