

IG SEISMIC SERVICES PLC

(the “Company”)

Code of Business Conduct and Ethics

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CODE OF BUSINESS CONDUCT AND ETHICS (THE "CODE")

1. INTRODUCTION

1.1 Application

- (a) Each employee, director or officer of the Company and its Subsidiaries (hereinafter referred to as “**the Group**”) must carefully read and understand this Code, and is individually responsible for following it and any other policies or guidelines the Group may communicate to them from time to time (the **Additional Guidelines**). It is obligatory that all employees, directors and officers of the Group comply with the Code.
- (b) Any employee, director or officer in a leadership position, must communicate and implement this Code and any Additional Guidelines, to their team and actively ensure that their team complies with their terms.
- (c) All employees, directors and officers should ensure that, where appropriate, any contractors, suppliers and agents of the Group also follow this Code.

1.2 Exceptions

Any waiver of or exception to this Code must be approved by the Board of Directors of the Company, and it must be promptly disclosed if required by law.

1.3 Retaliation

No employee, director, or officer of the Group is allowed to retaliate or take any hostile action against anyone who raises an issue of concern in good faith.

1.4 Reporting Violations

- (a) Any employee, director or officer who knows or has reason to believe there has been a violation of this Code, Additional Guidelines or applicable law, must report the incident. Any employee, director or officer who fails to report or provide further information about a violation or who intentionally reports false information will be subject to disciplinary action.
- (b) To report a violation or to ask questions or express concerns about this Code or any Additional Guidelines, an employee, director or officer should contact their direct or functional supervisor. If this is not practical, they should contact a member of the personnel, internal control or legal department.
- (c) The Group undertakes a principle that no discrimination, disciplinary sanctions or any other negative actions would be applied to an employee with respect to their duties and responsibilities within the Company, who has reported a case of non-compliance or violation of the Code.

1.5 Violation of this Code

Whether knowingly or not, if any employee, director or officer violates this Code, any Additional Guidelines communicated to them or any applicable laws, such individual could be subject to personal legal liability or company disciplinary action.

2. PERFORMANCE

- (a) Every employee, director and officer must ensure that they perform their role to the standard expected of someone in their role.
- (b) Where unsafe condition exists, whether in travel, operations, manufacturing, or any other activity, all employees, directors and officers can and must cease relevant operations to prevent injury or harm. The Group considers health, safety and environmental issues as critical to the conduct of effective operations. Every employee, director and officer should ensure that the Group complies with all health, safety and environmental requirements applicable to its operations.
- (c) No employee, director or officer may enter the Group's facilities or conduct Group business or utilise operating equipment if they are impaired by alcohol, drugs, or controlled substances or if they have illegal or unauthorised possession of any of these substances. The Group strives to provide a healthy environment for its employees.
- (d) Any employee, director or officer who is required to drive in the performance of their role must meet any specific safe driving standards communicated to them.
- (e) All employees, directors and employees must:
 - (i) deal fairly and transparently with customers, suppliers, and competitors and respect their rights, and act with integrity at all times;
 - (ii) not take unfair advantage of a business situation by abusing privileged information, misrepresenting material facts, or deliberately doing anything that could be seen as unfair dealing; and
 - (iii) not make any kind of agreement or understanding with our competitors that restricts full and fair competition in any way including those which involve, fixing or controlling prices, allocation of products or markets territories, or limiting the manufacture, sale, or production of any product or the provision of any service.

3. RELATIONSHIPS

- 3.1 All employees, directors and officers must treat each other, and any customers, contractors or other parties they interact with when conducting Group business, in good faith, a non-discriminatory manner, professionally and with mutual respect, trust and individual dignity. Externally, all employees, directors and officers should strive to meet the Group's ethic of protecting the environment.
- 3.2 No employee, director or officer may harass any other colleague. For the purposes of this paragraph, "harassment" includes any behaviour which is offensive or unwelcome or that unreasonably disrupts another person in his or her work.
- 3.3 The use, or contracting directly or indirectly of slave labour, child labour or any form of forced labour is strictly prohibited. Employees, directors and officers must conform to the Group's ethic of respecting human rights at all times.

- 3.4 The Group is committed to complying with all applicable laws pertaining to employment and seeks to engage constructively with labour unions elected by employees to represent their rights. The Group provides equal opportunity to all job applicants and existing employees.
- 3.5 It should be noted that the Group selects suppliers with the expectation that they will act in accordance with the Group's compliance and ethical requirements.

4. CONFLICTS OF INTEREST

4.1 General

- (a) A conflict between an employee, director or officer's (or their immediate family's) personal interests and the interests of the Group or a customer is a conflict of interest. All employees, directors and officers must avoid such' conflicts or a situations that may be perceived as creating a conflict of interest.
- (b) All-employees, directors and officers must ensure that neither they, nor any member of their family (extending to an employee's spouse / children, parents and other relatives) receives any improper personal benefits as a result of their position with the Group. In particular:
- (i) employees, directors and officers must use Group assets, such as equipment, financial assets, or confidential information, for proper Group purposes only;
 - (ii) any personal loan from the Group to an employee, director or officer is prohibited unless it is approved by the directors of the Group ;
 - (iii) loans of any type to directors or officers of the Group or any member of their families, as well as direct or indirect credit arrangements or guarantees of obligations to those individuals, are specifically forbidden; and
 - (iv) no employee, director or officer may accept any gift of more than a nominal value (defined as USD 200 or any lower limit specified by your location) from any individual or organisation that does business with the Group or wants to establish a business relationship with the Group.

4.2 Disclosing conflicts

All employees, directors and officers must disclose any actual or potential conflicts of interest including situations where they have an active personal interest with a supplier or contract or where an immediate family member works for an organisation that does business with or competes against the Group.

4.3 Personal interests in other companies

No employee, director or officer (or their immediate family) may have an active interest in any organisation that does business with or competes against the Group, including vendors or supplier companies. This includes, serving as a director, officer, employee, agent, or consultant of any such company unless prior approval has been obtained from the directors of the Group.

4.4 Doing business with the Group

If any employee, director or officer (or their immediate family) need to conduct a personal business transaction directly with the Group this may only be done by obtaining the prior written approval of the appropriate supervisor¹.

5. RECORDING, ACCOUNTING AND FINANCIAL PERFORMANCE OBLIGATIONS

5.1 Full and accurate accounting of our activities

- (a) Each employee, director and officer must keep honest and accurate business records and must not hide, alter, falsify, or disguise the true nature of any transaction. Falsification of data or input of knowingly false information into accounting systems by employees of Group companies is fraudulent and represents a criminal offence.
- (b) No business records, including e-mail messages, internal memos and formal reports should include any exaggeration, derogatory remarks, speculation, or inappropriate characterisation of people and companies.

5.2 Archiving and destroying business records

- (a) Every business unit is responsible for making sure that its records are retained or destroyed, according to local laws as well as the Group's standards, that govern document retention and destruction.
- (b) Where directed by the Group to or where law requires it, employees, directors and officers must retain documents, in electronic or other formats.
- (c) All Group assets, including all cash accounts, shall be part of the books of accounts included in uniform financial statements. All liabilities of the Group shall be included in the books of accounts, including loss contingencies required to be accrued under applicable accounting standards. The records supporting these assets, liabilities and equity shall be made fully available for audit by internal auditors and outside independent accountants.
- (d) Any employee, director or officer which is a manager or controller must ensure that:
 - (i) books, records, and accounts related to their operations accurately and fairly reflect, in reasonable detail, the transactions and dispositions of the assets under their control; and
 - (ii) with respect to the operations for which they are responsible, a system of financial internal controls is maintained, which is sufficient to provide reasonable assurances that the following criteria are met;
 - (A) the recorded accountability for assets is compared with the existing assets at reasonable intervals and appropriate action is taken with respect to any differences; and
 - (B) transactions may only be executed in accordance with general or specific authorisation of management and must be recorded and reported as necessary, to permit preparation of financial statements in

¹ It should be noted that it is not possible to list all situations / relationships which may create a conflict of interest, so conflicts falling outside those explicitly listed here as forbidden may still be considered as such.

conformity with financial reporting principles applicable to the Group, or any other criteria applicable to such statements, and to maintain accountability for assets.

5.3 Asset protection

- (a) Employees bear personal responsibility for protection of assets and their appropriate usage and are obliged to protect assets from loss, damage, improper use, theft, misappropriation or offence and use them in a responsible way.
- (b) Employees of the Group companies must protect any confidential information and never disclose it, unless such disclosure is approved by the Company.
- (c) Falsification of records about assets and misrepresentation of facts is considered to be fraud and will lead to liability both for an individual, and for the corresponding company of the Group.
- (d) Financial resources of any company of the Group must be protected from misuse, loss, fraud and theft. This applies to cash advances, travel allowances, entertainment expenses, purchases on behalf of the company corporate credit cards which can be used by the employees. It is necessary to provide accurate and precise expense reports, including supporting documentation and invoices.

6. CONFIDENTIALITY AND SECURITY OF INFORMATION

6.1 Confidentiality and Data Protection

- (a) In addition to those requirements under law, all employees, directors and officers must keep confidential all confidential or commercially sensitive information which they come to, regardless of the form of such information, and what it relates to. This includes protecting against theft of or damage to Group computing assets and other data devices provided to them for their work.
- (b) All employees, directors and officers must protect and respect the privacy of each others' personal information and must follow any additional guidelines communicated to them in relation to the collection, use, release, disclosure, and security of such data. The Group respects the confidentiality of employees' personal data.
- (c) All employees, directors and officers must ensure that any transfers of personal information across international boundaries comply with applicable company rules and law. Personal information shall only be obtained / saved/ transferred where necessary for commercial or regulatory purposes, and always in accordance with local law requirements.

6.2 Access to Group property

Each employee, director and officer must get the appropriate management authorisation for access to Group property, including buildings, equipment, and data.

6.3 Personal use of any Group company's brand name or trade mark

Except where required to do so for Group business, employees, directors and officers are not authorised to represent the Group on any web platforms and may not identify themselves as an, employee, director or officer of the Group.

7. INTELLECTUAL PROPERTY

- 7.1 All employees, directors and officers must respect all copyright laws and observe the terms and conditions of all software license agreements. In particular, they should never make unauthorised copies of software.
- 7.2 Where applicable, all employees, directors and officers must keep a record of the license agreements and documentation.
- 7.3 Any employee, director or officer who uses computers in the Group must comply with any restrictions on the installation and use of third-party software.
- 7.4 In cases not covered by the Code, employees must consult with the legal department of the Group regarding compliance with intellectual property rights².

8. INFORMATION TECHNOLOGY

The Group has the right to review any information stored or transmitted using Group IT tools, including e-mail messages and computer files. For the avoidance of doubt, any information an employee, director or officer wishes to keep private should not be created nor stored on Group systems.

All employees, directors and officers are accountable for all information created or stored on the Group computer assigned to them and must cooperate with any company investigations which may be necessary.

9. IMPROPER PAYMENTS

9.1 Bribes and Inducements

- (a) No employee, director or officer may offer or accept a bribe or inducement. For the avoidance of doubt, this includes anything of value for any reason, in order to:
- (i) influence someone's judgment about the Group's products and services or those of another company;
 - (ii) gain improper advantage when selling the Group's goods and services, conducting business transactions, or representing the Group's interests; or
 - (iii) influence the use of discretionary authority by any government official.
- (b) This includes any illegitimate payments to any government official in any branch of government (or anyone exercising governmental powers), political candidates or parties, officers or employees of any corporation owned or controlled by the government, any customer, or anyone else.
- (c) This applies not only to direct payments but also to payments through agents, consultants, suppliers, customers, or other third parties or reimbursing a payment that

² The concept of "intellectual property" includes the following: patent rights, trade and service marks, domain names, copyright, including copyright on software, design rights, rights of database extracts, "know-how" rights and other confidential information and rights determined by agreements related to such intellectual property.

you or someone else may have made personally. A breach of corruption and bribery laws is a serious offence which can result in fines for the Group and imprisonment for individuals, leading to substantial reputational damage.

- (d) Gifts and entertainment are permitted to the extent that they do not influence (or create the appearance of influencing) the decision-making process. The Group accepts gift exchange and entertainment within the following limits:
 - (i) gifts (one or more), including corporate gifts with presenter logo trademarks (journals, calendars and other), gifts at the time of statutory holidays, for example New year, Christmas, and also industry related holidays valued in accordance with regulatory rules of countries and regions, where the Group operates; and
 - (ii) Business breakfasts, lunches and dinners - in accordance with local Group companies' regulatory rules.

9.2 Contributions to political parties and candidates for public office

The Group is politically neutral and no Group funds or assets can be contributed to political parties or organizations, their leaders, or candidates for or in public office.

9.3 Facilitation Payment

The Group generally prohibits the payment of facilitation or expediting payments made to speed up any routine government action (for example, customs inspections, visa processing, and the like). Only if a payment is approved, identified and recorded correspondingly, may a facilitation payment be considered by the appropriate level of management. These facilitation payments cannot be used as a substitute for proper licenses or other required documentation.

10. COMPLIANCE WITH LAWS AND REGULATIONS

All employees, directors and officers must comply with all applicable laws and regulations at all times. For the avoidance of doubt, the applicable laws and regulations may be for a different jurisdiction to that which the employee, director or officer is located.

11. ANTI-MONEY LAUNDERING

The Group adheres to an anti-money laundering principles and implements special guidelines to avoid cash or equivalent receipts which result from criminal activity. The concept of "money laundering" is applied to the process of hiding money or its equivalent, resulting from illegal activities. Money or its equivalent used for the support of terrorism is also included in the definition of money laundering.

If necessary, the Group will assist law enforcement bodies in monitoring and returning the property purchased illegally and financial resources used for supporting terrorism.

12. INTERACTION WITH GOVERNMENTAL AUTHORITIES

All employees, directors and officers must consult with the legal department prior to delivering any information upon the request of governmental authorities if this information is not a part of a routine reporting process in accordance with applicable statutory or tax regulations.

13. REQUEST FOR INFORMATION AND CODE VIOLATION

This Code does not provide exhaustive information about every standard or policy of the Group. Every employee is responsible for understanding and complying with statutory requirements and internal rules of the Group and the corresponding Group company he or she is employed with, including provisions of this Code.

Prior to taking any action, an employee must ascertain that this action is:

- legal;
- corresponds to the requirements of the Group and the Group company he or she is employed with; and
- positively perceived by other parties (clients, communities etc.)

14. CONCLUDING PROVISIONS

The Code is approved by the Board of Directors of IG SEISMIC SERVICES PLC and is put in force by an order in each company of the Group.

The Board of Directors reviews the provisions of the present Code on an annual basis considering the Group's development and makes necessary changes. Any updates are made in accordance with the procedure established for approval and implementation of the Code.