

*This policy applies to all Norgeo LLC Employees, wherever located. All Norgeo LLC Employees are responsible for compliance with this policy in their conduct on behalf of the Company.*

## This Policy Applies to Everyone at Norgeo LLC

Norgeo LLC management is responsible for ensuring that employees under their supervision and authority comply with this policy. Management has vested certain employees with compliance responsibilities. Compliance personnel will assist Norgeo LLC Employees in understanding and complying with this policy, and will take steps to maintain and implement an anti-corruption program, but the responsibility for compliance shall remain with Norgeo LLC Employees. Norgeo LLC operations in specific countries may issue additional specific anti-corruption guidelines to conform to local laws or to address local circumstances. Any additional, country-specific guidelines must be consistent with this policy. No violation of federal, state, or foreign laws will be permitted or tolerated.

## We Prohibit Bribery and Corruption in All Forms

Bribery occurs when benefits (things of value) are provided directly or indirectly to individuals, including government officials, business partners, clients or prospective clients, for their personal benefit in order to influence their actions or decisions in their official or business capacity. Bribery is sometimes obvious and is sometimes very subtle. Norgeo LLC Employees are responsible for recognizing possible bribery and corruption and responding to them in an appropriate manner as set forth in this policy.

“Things of Value” is a broad concept, and can include cash, cash equivalents (for example, gift cards), meals, entertainment, travel, gifts, employment, contracts, in-kind services such as performing repair work on someone’s home, or any similar types of goods or services that have tangible economic value.

## Facilitating Payments

Facilitating payments are illegal under the laws of most countries around the world. In keeping with its policy of compliance with all applicable laws, Norgeo LLC does not permit facilitating payments. If you receive a request for a facilitating payment, you should decline to make it. It is not permissible to make such payments in the course of your work for the Company even if you bear the cost of such payments personally and do not seek reimbursement. All requests for facilitating payments should be reported to managers.

## Gifts and Entertainment

Promising, giving, and receiving gifts, meals, and entertainment can be a part of building business relationships. However, no employee of the NorGeo LLC, nor any person who performs services for or on behalf of the NorGeo LLC, should offer, promise, give, request, agree to receive, or accept excessive or inappropriate invitations, gifts, meals, or entertainment that could create or imply an improper influence or obligate any recipient.

Employees may give and accept courtesy gifts, meals or entertainment of modest value, such as small presents or hospitality gifts, only when such is not intended to bring about improper performance and could not be construed by an impartial observer as aimed at providing or obtaining undue advantages.

Employees, and Directors of the NorGeo LLC that are not employees, shall not accept invitations, gifts, meals or entertainment from any third party that exceeds the amount or do not comply with the guidelines set forth in the Policy on Transparency in the Relationships with Third Parties. The reporting and authorization procedures set on said Policy shall be followed in all cases.

Under no circumstances may cash or goods easily converted into cash be given or accepted.

Invitations to business-related events, conferences, conventions, commercial presentations or technical courses shall be authorized by the supervisory levels defined under the Policy on Transparency in the Relationships with Third Parties.

These restrictions on the receipt or provision of invitations, gifts, meals or entertainment are equally applicable to relatives or associates of any person with whom any employee of the NorGeo LLC may be dealing or interacting with in any matter related to the NorGeo LLC.

Employees should not give anything (e.g. money, gifts, travel expenses, excessive entertainment or any other advantage) to anyone if this action could be construed as an intention to influence the decision of government officials or political representatives or their performance in a relevant function or activity, or a violation of any applicable laws or regulations. The NorGeo LLC will not permit the use of representatives, intermediaries, agents, subsidiaries or joint venture NorGeo LLC to give, or promise to give anything to anyone on behalf of the NorGeo LLC in order to avoid this prohibition.