

The Administration, Finance, and Systems Department, the Human Resources Department, and the Management shall assist with the implementation of the appropriate measures that ensure all personnel, suppliers, agents, representatives, subcontractors, consultants, and anyone who performs services to the NorGeo LLC or on their behalf are aware of the contents rising from the Code of Ethics and understand its range of application in their workplace environment.

Compliance

Adherence to the conduct guidelines set forth herein is a condition for employment at the NorGeo LLC.

All employees shall have personal and non-transferable responsibility in the application of this Code and, once informed about its implementation, they may not justify its transgression due to ignorance or to conflicting instructions received by any hierarchical level.

Employees should adopt a proactive attitude that prevents passively tolerance towards possible deviations, and act on their own initiative when detecting deviation from the principles of this Code in any kind of process.

Every employee should comply with the guidelines in this Code and cooperate with internal investigations when required.

The hierarchical levels with supervisory functions shall not approve or tolerate violations to this Code and, in case of awareness of such incidents, they shall report them immediately.

Disciplinary sanctions may lead to dismissal with justifiable grounds and to legal actions being initiated even after dismissal, depending on the seriousness of the violation and applicable laws.

Relations with the Community

Political dealings on behalf of the NorGeo LLC are restricted, and relations with government officials are regulated.

On behalf of the NorGeo LLC, employees are not authorized to openly support any political party, or to participate in electoral campaigns, or to take part in religious, ethnic, political or inter-state conflicts.

Any political contributions made in any country shall comply with the policies and procedures set forth in the Policy on Business Conduct.

The Company's employees must respect the legislation and regulations regarding relations with local government officials.

Promotion of Respect for Environmental Legislation

The NorGeo LLC aims to achieve continuous improvement in environmental performance, concentrating their efforts on areas of greatest impact at our operation sites. The NorGeo LLC seeks to comply and expect all employees to comply with the spirit as well as the letter of the applicable environmental laws and regulations. Where none exists, employees must set themselves appropriately high standards.

The NorGeo LLC are committed to driving down the environmental impact of their operations through the efficient use of resources, transport planning, the reduction of waste and emissions and the careful handling of hazardous substance.

The Company's environmental standards apply to all locations and aspects of our business.

Protection of Competition

The NorGeo LLC are committed to the values of fair, honest, and transparent competition.

Competition and antitrust laws around the world, many of which are applicable to the NorGeo LLC, are aimed at prohibiting unreasonable restraints of trade and preserving competition. Examples of competition/antitrust violations include price fixing, bid rigging, market or customer allocation and abuse of a dominant position. The penalties for breaching competition and antitrust laws are severe. In addition to material fines and others penalties, individuals found guilty of the most serious offences can face imprisonment.

The NorGeo LLC strive to strictly observe the competition and antitrust laws of all countries in which they do business, and to avoid any illegal conduct. Employees must not engage in any anti-competitive conduct, and must strive to avoid even the appearance of a possible violation. Employees with commercial responsibilities, or who attend trade associations or industrial group meetings, must be particularly aware of their obligations under applicable competition and antitrust laws.

Workplace Environment

All persons have the right to apply for a position at the NorGeo LLC or to be considered for a new position in accordance with opening requirements and merit criteria, without arbitrary discrimination.

All employees, at all levels, shall cooperate to maintain a respectful environment should there be personal differences.

The NorGeo LLC will implement mandatory policies in line with applicable national laws aiming to promote a healthy and safe workplace environment.