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associates

# CODE of CONDUCT

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*Earth Science Associates*

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**Who we are and what we do:**

Earth Science Associates is a software development and consulting company to the oil and gas industry, government agencies and international organizations. The company is best known for the GOM<sup>3</sup> geographic information system (GIS) and its online component, GOMsmart.

Our ethical principles are the values that set the ground rules for all that we do as a company. We strive to always be mindful of these principles while striving to achieve responsible commercial success.

**Our values and beliefs:**

- Our ability to create value depends on applying high ethical standards to create a trust-based relationship with our clients, our staff and our partners.
- We embrace diversity and new perspectives.
- In all our business activities we will comply with applicable laws, act in an ethical and socially responsible manner, and respect internationally recognized human rights principles.
- We work together as one team, we share knowledge and we help each other succeed. We engage with respect and earn the trust of our business partners.
- We act in a sustainable, ethical and socially-responsible manner, respecting each other and contributing to a positive working environment.

## **The Ethical Principles Are:**

### **Principle 1: Integrity**

The Company is fully committed to the principle of honesty and integrity in the delivery of services and goods to our clients. Everyone should ensure that the business operations, applications for services, procurement or staff recruitment, are dealt with in a fair and impartial manner. This applies to contractors and temporary/part-time employees.

### **Principle 2: Equal Opportunity**

The Company is an equal employment opportunity employer. Employment opportunities are available regardless of race, color, sex, religion, national origin, age, sexual orientation, disability or other legally protected status.

### **Principle 3: Safety and Health Practices**

The Company is committed to an injury-free and illness-free workplace that is operated in an environmentally sound manner in compliance with all relevant laws and regulations that protect worker safety and the environment. Employees should perform work in a safe manner and ensure that no hazards exist.

### **Principle 4: Governance and anti-corruption**

The Company has zero tolerance for corruption or bribery of any kind. All employees must never offer to provide anything of value directly or indirectly to government officials and business partners to secure an undue advantage. The Company prohibits payment, offers of payment as well as anything of value directly or indirectly with the purpose of influencing or obtaining undue business or personal advantage.

### **Principle 5: Financial Reporting**

All transactions of the Company must be duly recorded so as to permit preparation of clear financial statements in conformity with generally accepted accounting principles. No false or misleading entries may be made in the books and records of the Company for any reason, and no employee may engage in any arrangement that results in such a prohibited act. No undisclosed or unrecorded fund or asset of the Company may be established for any purpose. No payment on behalf of the Company (including those by cash) may be done without adequate supporting documentation or made with the intention or understanding that any part of such payment is to be used for any purpose other than as described by the documents supporting the payment. All employees at any level are expected to implement and strictly follow these policies.

## **Principle 6: Restrictive Agreements with Third Parties**

The Company does not condone activities that seek to gain an unfair competitive advantage. No individual may engage in any activity which violates any valid restrictive agreements entered into by that individual for the benefit of a third party, and no individual may, directly or indirectly, use or disclose any confidential information or trade secrets of a third party that the individual obtained while employed by or associated with such third party.

## **Principle 7: Government Contracts and Services**

The Company is committed to complying with all applicable laws and regulations relating to government (public procurement) contracts and services and to ensuring that its reports, certifications and declarations to government officials are accurate and complete and that any deviations from contract requirements are properly approved.

## **Principle 8: Acceptance of Advantages**

It is the policy of this Company to prohibit all staff from soliciting or accepting any advantage from any persons having business dealings with the Company (e.g. clients, contractors).

## **Principle 9: Handling of Classified or Proprietary Information**

Individuals are not allowed to disclose any classified or exclusive information to anybody without authorization. Staff who have access to or are in control of such information should at all times provide adequate safeguards to prevent its abuse or misuse. Examples of misuse include disclosure of information in return for monetary rewards, or use of information for personal interest. It should also be noted that unauthorized disclosure of any personal data may result in a breach of the applicable legislation on privacy.

## **Principle 10: Compliance with the Code**

It is the personal responsibility of every person to understand and comply with the Code of Conduct. Higher ranked employees should ensure that their subordinates understand and comply with the standards and requirements stated in the Code. Any staff member who violates any provision of the Code will be subject to disciplinary action. In cases of suspected corruption or other criminal offences, a report will be made to the appropriate authorities.