

CODE OF ETHICS & PROFESSIONAL CONDUCT POLICY STATEMENT 2024/2025



Document #	Effective Date	Next Rev Date	Department	Location	Rev #
COR-POL-003	June 2024	June 2025	QHSE	Echo))) Drive	002

This Policy covers all of the corporation's work activities

All employees and contractors of ECHO Seismic LTD. and its affiliates (the "Corporation") are expected to abide by all Policies & Procedures of the Corporation, and to act in a manner that will uphold and enhance the Corporation's reputation for honesty, integrity, and reliability. Further, the principles of appropriate business conduct adopted in the Code are consistent with the core values and management philosophy of the Corporation and are to be pursued by all employees.

The professional integrity and actions displayed by individual employees and contractors play an important role in reflecting the Corporation's values. The fundamental principles of the Code are designed to deter unlawful activity and misconduct and to promote the following:

- Compliance with applicable governmental laws, rules, and regulations.
- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships and the confidentiality of information.
- Full, fair, accurate, timely and understandable disclosure in reports and documentation that the Corporation files with, or submits to, government authorities, and in other public communications made by the Corporation.
- Commitment to protecting the environment, and the health and safety of the public and all employees and contractors of the Corporation.
- Excellent employee relations, including the commitment of the Corporation to provide an environment that is without discrimination or harassment.

The Corporation shall conduct business in compliance with all laws, rules, and regulations applicable to each jurisdiction in which it operates. The Corporation will ensure, to the highest degree possible, that agents, contractors, consultants, partners, and business associates comply with such laws, rules and regulations when they are working for the Corporation. Employees are expected to acquire sufficient knowledge of applicable laws, rules and regulations related to their scope of accountabilities, responsibilities, and duties to ensure their compliance with all applicable laws, rules, and regulations. Employees and contractors are required to avoid any situation that could be perceived as improper, unethical or indicate a casual attitude towards compliance with such laws, rules, and regulations.

The Corporation's employees are required to always act with honesty and integrity and shall promote the highest standards of ethical conduct that:

- Prohibit and eliminate the appearance or occurrence of conflicts between the best interests of the Corporation and the private or personal interests of any officer or employee of the Corporation;
- Protects and safeguards the Corporation's assets (including information assets), documents and records from unauthorized access, improper use, and misappropriation; and
- Protects the confidentiality of information concerning activities of ECHO Seismic LTD., its affiliates, and companies that they do business with.

Corporation employees and contractors are expected to avoid any outside activity, financial interest or relationship that may present a possible conflict of interest or the appearance of a conflict of interest, and to promptly disclose any such conflict of interest that has occurred or has not been avoided to a representative of Echo Seismic Ltd.'s senior management.

All employees are expected to comply with the Corporation's Insider Trading Policy, including the provisions related to trading restrictions and blackout periods. Further, all employees are required to comply with the ECHO Seismic LTD. Corporate Anti-Corruption Policy.

This policy and any standards developed in support of the overall Policy objective are subject to ongoing review and evaluation by the President and Chief Executive Officer.

Modifications to this policy statement shall be made as deemed necessary to respond to current circumstances and/or evolving needs of ECHO Seismic LTD. and its affiliates.

Richard Habiak, President, and CEO
ECHO Seismic Ltd

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