

ANTI-CORRUPTION POLICY STATEMENT 2020/2021



Document #	Effective Date	Next Rev Date	Department	Location	Rev #
COR-POL-001	2020	2021	QHSE	Echo))) Drive	000

This Policy covers all ECHO Seismic work activities

- e) **Charitable Contributions:** make any charitable contributions greater than \$5,000 CAD or equivalent on behalf of the Company except with the prior written approval of the Chief Compliance Officer;

Additional areas where anti-corruption requirements have been established include the following:

- a) **Accounting - Neither** the Corporation nor any of the directors, officers, employees, consultants or contractors shall:
- (a) Establish or maintain accounts that do not appear in any required books and records;
 - (b) Make transactions that are either not recorded in required books and records or are not adequately identified in those books or records;
 - (c) Record non-existent expenditures in required books and records;
 - (d) Enter liabilities in required books and records bearing an incorrect identification of their object;
 - (e) Knowingly use false documents; or
 - (f) Intentionally destroy required books and records earlier than permitted by law.
- b) **Solicitation of Improper Payments-** Any demand, request, suggestion, expectation, or invitation ("solicitation") by a public official or any other person for any payment of money or anything of value shall be promptly reported by Personnel to the Chief Compliance Officer.
- c) **Knowledge or Suspicion of Bribery -** All Personnel are required to report to the Chief Compliance Officer any information that comes to their attention in relation to any actual or suspected improper payments made, offered, or promised by anyone on behalf of the Company. The Company maintains a confidential hotline to facilitate the reporting of such complaints, as detailed in the Company's Whistleblower Policy. Personnel who raise genuine concerns will not be subject to any retribution or disciplinary action.
- d) **Consequences of Non-Compliance -** Failure to comply with this Policy may result in severe consequences, including internal disciplinary action or termination of any employment, consulting or similar arrangement without notice and for cause. In addition, a violation of this Policy may constitute a criminal offence and may expose the Company and/or Personnel to fines and/or imprisonment.

The Board will review and evaluate this Policy on an annual basis to determine whether this Policy is effective in ensuring compliance by the Corporation, its directors, officers and other employees, consultants and contractors with the Act.

If there are, any questions about how this Policy should be followed in a particular case, personnel are directed to contact the Chief Compliance Officer.

A handwritten signature in black ink, appearing to read "R. Habiak", is written over a horizontal line.

Richard Habiak, President, and CEO
ECHO Seismic Ltd