

## CODE OF ETHICS & PROFESSIONAL CONDUCT POLICY STATEMENT 2017/2018



Document #	Effective Date	Next Rev Date	Department	Location	Rev #
COR-POL-003	2017/2018	2017/2018	QHSE	Echo ))) Drive	000

**This Policy covers all work activities where ECHO Seismic Ltd has Prime Contractor Status**

All employees and contractors of ECHO Seismic LTD. and its subsidiaries are expected to abide by all Policies & Procedures of the Company, and to act in a manner that will uphold and enhance the Company'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 Company 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 Company'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 Company files with, or submits to, government authorities, and in other public communications made by the Company;
- Commitment to protecting the environment, and the health and safety of the public and all employees and contractors of the Company;
- Excellent employee relations, including the commitment of the Company to provide an environment that is without discrimination or harassment.

The Company shall conduct business in compliance with all laws, rules and regulations applicable to each jurisdiction in which it operates. The Company will ensure, to the extent possible, that agents, contractors, consultants, partners and business associates comply with such laws, rules and regulations when they are working for the Company. 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 Company's employees are required to act with honesty and integrity at all times 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 Company and the private or personal interests of any officer or employee of the Company;
- Protects and safeguards the Company'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 subsidiaries and companies that they do business with.

Company 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 Tesla Exploration's senior management.

All employees are expected to comply with the Company'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. Anti-Corruption Policy, including those provisions specifically related to improper payments to or from Government officials, agents or suppliers.

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 subsidiaries.

**Richard Habiak, President, and CEO**

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

*Modifications shall be made as deemed necessary, to respond to current circumstances and/or evolving needs of ECHO Seismic Ltd and its subsidiaries*

**ECHO Seismic Ltd. Policy Statements are available for viewing on-line at [www.echo-group.com](http://www.echo-group.com)**