

ETHICS POLICY

AGS is committed to operate all activities within the spirit and letter of all laws and regulations affecting its businesses and employees. Employees must exercise the highest level of integrity, ethics and objectivity in their actions and relationships which may affect AGS. Employees must not misuse their authority or influence of their positions in these relationships. Moreover, an employee has the duty to act in the best interest of AGS at all times.

While AGS has no wish to interfere in any employee's outside activities, AGS has a policy prohibiting conflicts of interest.

- AGS requires that employees (and their immediate family, namely; spouses and family living in the same household) not have any ownership interest in, or own property with, any of AGS vendors, suppliers, contractors, agencies, customers or competitors (or their office employees) unless AGS determines that such ownership interests do not conflict with the employee's obligations to AGS.
- AGS requires that employees not work for or conduct any outside business with a competitor.
- To ensure the highest level of objectivity in dealing with AGS vendors, suppliers, contractors and agencies and to avoid the appearance of impropriety, employees and their immediate family are not permitted to accept personal benefits, solicited or unsolicited, of any kind. This includes gifts, free services, discounts, loans, lavish entertainment or other special favors.
- Employees may not use corporate assets or funds for any unlawful or improper purpose. In accordance with the AGS Anti-Corruption Guidelines. AGS does not authorize and will not condone any payment by any employee that is in the nature of a bribe, kickback, disclosed commission or a commission in excess that is required in ordinary course of business to a third party for obtaining any business or otherwise bestowing a special favor on AGS or the employee. Gifts or payments may not be offered or given to foreign officials, political parties or candidates. While certain nominal payments or gifts to administrative personnel, who do not exercise discretionary authority, may be customary, any such payments or gifts must be disclosed to senior management in advance to ensure that they are appropriate. Records of any such payment or gift must also be maintained.

AGS maintains a Corporate Compliance Hotline, +1 832 781 2666 and email address cc.hotline@axxisgeo.com at your disposal if you feel that any employee is in breach of the Ethics Policy please report it immediately no matter how minor the claim may seem. Anything you disclose will remain confidential.

Approved by:



AGS Chief Executive Officer
1st January 2020