



# TGS Code of Conduct

TGS LAC-GOV 0563

*Revision 06 - 26.07.2024*

Energy Starts With Us



## MESSAGE FROM OUR CEO

The foundation of our Company's superior business performance is built on our long-standing values of honesty, integrity, accountability, and respect for others. In order for TGS to prosper, we need the trust and respect of our customers, suppliers, shareholders, employees, and the communities in which we work and live. Every employee of TGS has a responsibility to act in accordance with the law and the standards set out in TGS' Code of Conduct.

We make business choices and decisions every day, and it is imperative for us, as an industry leader, to maintain our commitment to act responsibly and with integrity. Although the Code cannot address every individual situation we face, it is designed to help employees understand the wide variety of issues that may arise in day-to-day business life and to guide employees in making ethical decisions. The Code is based on our beliefs and values and should govern our words and actions. There should be no gap between what we say and what we do here at TGS.

Employees should always feel secure to seek advice and raise concerns. TGS is committed to facilitating an open environment where employees feel both comfortable and obligated to raise questions and report concerns regarding the Code. If you are unsure what compliance means in a particular circumstance, ask your supervisor or contact the Compliance Department. If you believe the Code has been broken, it is your responsibility to speak up.

Our collective determination to meet and exceed the standards of conduct in the Code is essential to our future success. Let's set an example that all companies will strive to follow.

**Kristian Johansen** | Chief Executive Officer, TGS



## ONE TGS

### 1.1 Our Code of Conduct

We will comply with applicable laws and act in an ethical, sustainable, and socially responsible manner in all of TGS' operations. We make business choices and decisions every day, and it is imperative for us to maintain our commitment to act responsibly and with integrity. The Code of Conduct is a statement of our expectations and requirements for ethical conduct.

The Code applies to every officer, director, employee, and hired contractor of every TGS company. Contractors and consultants who are agents of TGS are required to act consistently with the Code when acting on behalf of TGS. TGS has established the Compliance Department and the position of Compliance Officer to supervise TGS' ethics and compliance activities and to administer and provide guidance on the Code. The Compliance Officer is responsible to both the CEO and TGS' Board of Directors.

### 1.2 Your Responsibilities

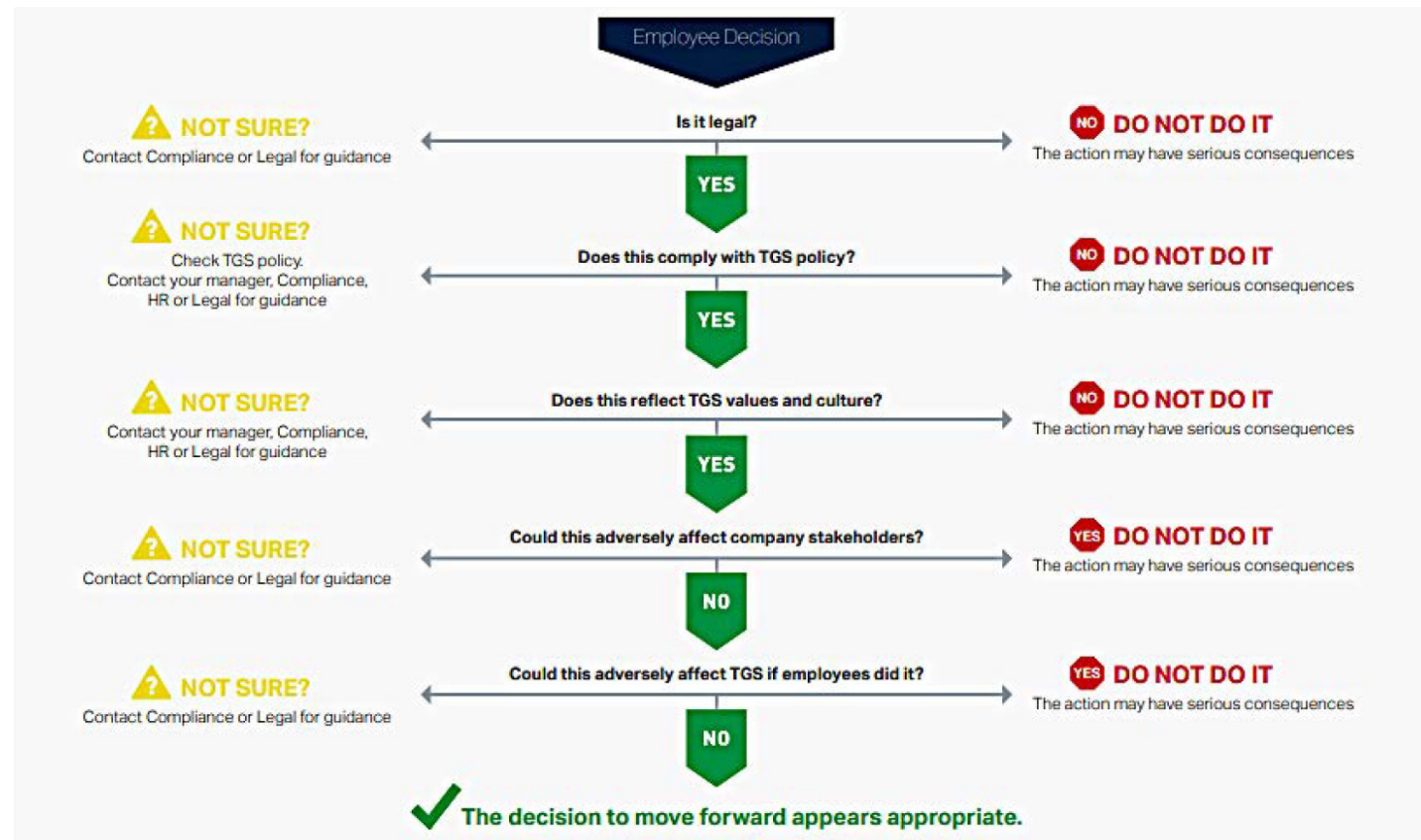
The Code is for you and sets the framework within which all TGS employees must operate every day, without exception. It is your responsibility to comply with the Code, in both letter and spirit, as well as all other policies and procedures and applicable laws relevant to your work. Any questions regarding the Code can be directed to the Compliance Department or the department responsible for governing the conduct in question.

### 1.3 Responsibilities of Leaders

We are committed to developing the best leaders for our company. TGS leaders and managers are role models for their teams, and we expect our leaders to demonstrate ownership and commitment to our culture of compliance. As a leader, you are responsible for ensuring that all activities carried out within your area of responsibility are done so in accordance with the Code, TGS' policies and procedures, and applicable law.

## 1.4 Ethical Decision Tree

We recognize that the Code cannot give you specific advice for every situation you may face. To help you think through a particular dilemma you are facing relating to our Code, work through the questions in TGS' Ethical Decision Tree.



## 1.5 Seek Advice & Speak Up

It is vital at TGS that everyone feels comfortable and confident to ask questions, seek advice, or raise concerns regarding matters related to the Code. If you would like advice on any matter relating to the Code, speak to your manager or TGS' Compliance Department, or you may address your questions to [compliance@tgs.com](mailto:compliance@tgs.com).

If you suspect a possible violation of the Code, the law, or other unethical conduct, it is your duty to report this immediately. We recognize that raising potential issues is not always easy, and therefore, TGS has provided several avenues for you to report concerns:

- Notify your manager or your manager's supervisor if you become aware of any activity you think is a violation of the Code
- Contact TGS' Compliance Department via email ([compliance@tgs.com](mailto:compliance@tgs.com)), phone, or in-person
- Report your concern, anonymously if preferred, to TGS' Hotline here: [EthicsPoint - TGS](#)

Reports of violations will be investigated under the Compliance Department's supervision, as he or she finds appropriate. TGS expects its employees to cooperate in the investigation of suspected violations. The Compliance Department will not, to the extent practical and appropriate under the circumstances and the law, disclose the identity of anyone who reports a suspected violation or who participates in an investigation. Because failure to report criminal activity can itself be understood to condone the crime, we emphasize the importance of reporting. Failure to report knowledge of wrongdoing may result in disciplinary action against those who fail to report.

## 1.6 Non-Retaliation Policy

TGS will not tolerate any form of retaliation directed against any person who raises a concern in good faith about a possible violation of the Code or the law, even if the report does not turn out to be an actual violation, or who cooperates in any related investigation or proceeding. Any threat or act of retaliation against TGS employees will be treated as a serious violation of the Code. Acting in good faith means that you have made a sincere report in a responsible manner through any of the channels listed above.

## TGS BEHAVIOR, PEOPLE & CULTURE

### 1.7 Consequences of Breach

We will not tolerate any breaches of the Code or the law. Potential misconduct will be investigated by the Compliance Department or other relevant internal or external experts. TGS will pursue remedial measures against those who breach the Code or laws, as well as against leaders who disregard or tolerate such breaches through either negligence or actual knowledge. The remedial measures may include termination of your employment and reporting to the relevant authorities, which may lead to civil, criminal, or financial liability. Incidents of ethical misconduct will be recorded and reported in accordance with our governing documents.

### 2.1 Equality & Diversity

TGS values diversity of people and is committed to fostering a work environment in which all individuals are treated with respect and dignity. Each individual should be permitted to work in a business-like atmosphere that promotes equal employment opportunities and prohibits discriminatory practices. Therefore, TGS expects that all relationships among persons in the workplace will be business-like and free of unlawful bias or prejudice. It is TGS' policy to ensure equal employment opportunity without discrimination on the basis of race, color, national origin, religion, gender, age, disability, sexual orientation, marital status, or any other status protected by law.

### 2.2 Harassment & Intimidation

We expect you to treat everyone you come into contact with through work or work-related activities with courtesy and respect. TGS will not tolerate harassment or any verbal or physical conduct that is humiliating, intimidating, disrupts others' work performance or creates a hostile work environment, and violence or threats of violence are forbidden at TGS. Feedback, criticism, and challenge should always be delivered in an appropriate and respectful manner.

### 2.3 Human Rights

TGS supports the UN Universal Declaration of Human Rights, the ILO Core Conventions on Labor Standards and its Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political

Rights, and aligns our business practices with the ten principles of the United Nations Global Compact. This includes the recognition of the freedom, the rights, the dignity, and the worth of the human person and promotion of equality irrespective of gender, race or religion. We are committed to respecting all internationally recognized human rights, and strive to contribute to the general wellbeing of the communities in which we operate and implementing systems to identify and mitigate risks of human or labor rights violations within TGS and our supply chain. TGS is committed to facilitating freedom of association and effective recognition of the right to collective bargaining, decent wages and working conditions. TGS opposes all forms of human trafficking, including child labor and forced labor, and endeavors to work with business partners and suppliers who share and value these principles in their operations. TGS will not accept any infringement of basic human or labor rights in our operations, and employees must notify the Compliance Department if they become aware of such.

## 2.4 Health & Safety

Providing a safe, healthy and sustainable workplace for our employees, contractors, vendors and clients that meets or exceeds all appropriate legal requirements is critical to TGS' success. To protect the safety of themselves and others as well as the environment, employees and other persons who are present at TGS facilities are required to carefully follow all safety instructions and procedures adopted by TGS. We are continuously working on improving and enhancing the health, wellbeing, safety and security standards for our employees and insist on the same from our contractors and vendors. We strive for transparent reporting and treat every safety incident as a learning opportunity.

TGS is committed to promoting and reinforcing safe behavior and practices, promoting the good health and wellbeing of all employees, encouraging responsibility and accountability, stopping any unsafe work practices, and welcoming intervention in unsafe practices where appropriate. Questions about possible health and safety hazards at any TGS facility should be directed immediately to your supervisor or TGS' HSE Department.

## 2.5 Security

TGS is committed to proactively monitoring and mitigating security risks to ensure the safety and wellbeing of our employees. Our ambition is zero harm to our personnel and assets. TGS strives to continually monitor global security risks, assess and mitigate security risks for all operations and locations, never operate under an unacceptable level of security risk, promote security awareness among all employees, and be prepared to manage crisis situations.

## 2.6 Drugs and Alcohol

TGS provides a drug and alcohol-free place to work. The possession or consumption of illegal drugs or substances and consumption of alcohol on worksites are prohibited. We will not tolerate anyone being under the influence of illegal drugs and/or substances and/or alcohol while working for TGS, and personnel may be randomly tested, as permitted by local laws. There may be instances where TGS finds it appropriate to serve alcohol at work related social events at the TGS worksite or elsewhere.

## 2.7 Employment

TGS will comply with all applicable wage and labor laws and other statutes regulating the employer-employee relationship, the workplace environment, and labor unions. No TGS employee may retaliate or take action against another employee who seeks to invoke his or her rights under the laws governing labor and employee relations. For reasons of supervision, safety, security, and morale, TGS generally discourages the hiring, contracting, or employment of employees' relatives, and avoids situations where employees who are related (either by blood or marriage) are working in the same department or working in a direct or indirect reporting or supervisor/subordinate relationship with one another. Questions about the laws or TGS policies governing labor and employee relations matters should be directed to the Human Resources Department.

## 2.8 Conflicts of Interest

Directors, officers and employees of TGS have a duty of loyalty to TGS and must therefore avoid any actual or apparent conflict of interest with TGS. A conflict of interest may occur when your personal relationships, participation in external activities, or an interest in another venture influence or could be perceived by others to influence your decisions for TGS or are opposed to the interests of TGS. An actual, potential, or perceived conflict of interest may jeopardize your reputation as well as TGS'. We expect that you always act in the best interest of TGS when you are representing the company, and that you do not place yourself in a position that would have the appearance of being, or could be construed to be, in conflict with TGS. You must ensure that you receive internal approval of all directorships, employment or assignments (whether held by you or someone with whom you have a personal relationship) in other enterprises which have, or may be expected to have, a commercial relationship with TGS.

You need to be careful that investments you and your family make do not create a conflict of interest or impair your



ability to make objective decisions on behalf of TGS. Conflicts may occur if you have or make a substantial investment in our competitors, suppliers, or customers. A substantial investment is one that would allow the investor the ability, whether or not exercised, to influence, manage, or control commercial or business decisions of that company. Any substantial investment in a competitor, supplier, customer, or other entity TGS may do business with requires the prior written approval of your supervisor and the Compliance Officer. (Usually, ownership of less than 1% of the outstanding shares of a publicly traded company is not a problem; however, if in doubt, check with the Compliance Department.)

Any action that might involve an actual or perceived conflict of interest should be fully disclosed in writing to the Compliance Department and your supervisor for review and written approval as soon as the potential conflict arises.

## 2.9 Outside Activities

TGS expects you to commit your full working day on TGS matters. For this reason, TGS prohibits employees from “freelancing,” “moonlighting” or participating in any other employment or directorships that (i) materially encroach upon the time or attention that should be devoted to employee’s duties, (ii) adversely affect the quality of work performed, (iii) compete with TGS’ activities, (iv) imply sponsorship or support by TGS of the outside employment or organization, or (v) otherwise adversely affect TGS’ name or brand. All secondary employment, freelancing or moonlighting activities, or outside directorships require prior written approval of the Compliance Department and the employee’s supervisor. Employees who have been granted permission for secondary employment, freelancing, moonlighting, or outside directorships may not use TGS time, facilities, resources, or supplies for such work.

## 2.10 Political Activity

TGS understands that you have the right to engage in lawful political activity on your own time. However, we must also protect TGS’ interest and reputation, and therefore, it is important that individuals keep their personal political activities separate from their roles at TGS.

You may not use TGS funds or resources, either directly or indirectly, to help fund political campaigns, political parties, political candidates, or anyone associated with them, including political action committees (PACs). TGS funds may not be used to make political payments under the guise of charitable donations, and no contributions should be made with the expectation of favorable government treatment in return, as doing so may violate the law and be viewed as corruption.

Employees are free to exercise the right to make political contributions with their own funds within legal limits, unless such a contribution is otherwise prohibited by TGS' other policies. TGS will not reimburse any employee for political contributions, and employees should not attempt to receive or facilitate such reimbursements. You must always make it clear that the political views you express or actions you take are your own and not those of TGS, unless you are explicitly required to and have been appointed by TGS to represent TGS' views as part of your role. You are responsible for understanding the rules on conflicts of interest and ensuring that your participation in political activities does not involve you or TGS in a conflict of interest.

Any political activity or contribution by an employee which might appear to constitute an endorsement or contribution by TGS must be approved in advance by the Compliance Officer or the Legal Department. If you are standing for public office, you must consult and gain approval from your manager and the Compliance Officer before standing and comply with local laws regulating political participation. TGS does not generally engage lobbyists to act in their own name while representing TGS towards public authorities seeking to influence political decisions.

## 2.11 Inside Information

As TGS is a publicly traded company, we comply with Norwegian and other applicable international laws on insider trading. If you become aware of inside information about TGS or another company, even if acquired incidentally, you have a legal duty of confidentiality and due care with regard to that information. You are prohibited from trading, or advising anyone else to trade in, any financial instruments (stock, options, bonds) issued by TGS or another company if you possess or have access to inside information related to that company. Inside information is information of a precise nature relating to a company or its stock, that is not yet public or commonly known and would likely have a significant effect on the price of that stock (i.e., financial results, profit warnings, mergers, divestments, etc.).

Certain individuals within TGS, such as TGS' Board of Directors and corporate executives, are subject to stricter insider trading regulations. You are responsible for being aware of and abiding by the insider trading regulations applicable to your position at TGS. Questions about the sale or purchase of TGS' financial instruments or circumstances that might involve inside information or securities laws should be addressed to TGS' CFO or the Compliance Department, who may refer individuals to their personal attorneys. Failure to abide by insider trading laws may subject both you and TGS to legal liability.

## 2.12 Community Relations and Charitable Contributions

TGS is committed to supporting local, nonprofit community organizations and charities that focus their services on people and are dedicated to (i) providing access to healthcare and medical services and helping to fight disease; (ii) assisting underprivileged, underrepresented, or at-risk communities or groups; (iii) providing humanitarian aid or disaster relief; (iv) addressing environmental issues; or (v) promoting geophysics and geoscience educational experiences. TGS actively supports reputable charitable organizations and programs that serve the communities in which we operate as well as encourages employees to donate their time to community and charitable causes. We also engage in corporate responsibility and social investments in order to comply with laws, government requirements, and contractual obligations, or to pursue TGS' legitimate business interests, strengthen TGS' reputation in the areas we operate, or work towards sustainability goals. All charitable contributions and social welfare contributions, whether monetary or in-kind donations, made on behalf of TGS must be in accordance with applicable law and TGS' policies regarding charitable and social welfare contributions.

## 2.13 Minorities and Indigenous Peoples Rights — Local Communities

TGS is committed to respecting the importance of the social, cultural, religious, and spiritual values and practices of minorities, indigenous and tribal peoples, and their relationship with waters, land, or territories. To the extent our work affects these peoples, TGS will undertake a process to minimize and manage such effects. TGS will also respect the local community and work according to internationally recognized principles and seek to prevent and mitigate adverse impact on local communities.

## TGS INFORMATION & COMMUNICATION

### 3.1 Use of IT & Electronic Communications

TGS expects its employees to use TGS' computer and IT systems, including email and the internet, for TGS-related purposes. Information produced and stored on TGS' IT systems is TGS' property and may be accessed by TGS in accordance with and subject to applicable law. TGS' electronic communication channels are primarily for TGS business use, and never for personal financial gain in conflict with TGS interests. Employees are expected to always represent TGS in a professional manner when easily identifiable as a TGS representative.

Employees may not comment privately in forums or on social media when registered with a TGS e-mail address and must avoid private statements on social media which can be understood as representing the views of TGS. Employees must submit requests for posting TGS-related material on social media to the TGS Marketing Department and must follow the approved brand standards when representing TGS-related material online.

### 3.2 Information Security

Due to the ever-prevalent threat of cyber-attacks or other malicious activities to TGS and our data security, TGS monitors its IT solutions and equipment to detect such risks, and these efforts may include blocking access to inappropriate websites and interception of any information transmitted by or stored on our system. We have implemented an appropriate IT infrastructure, a support standard and a cyber security framework that assures the confidentiality of proprietary and other sensitive information. This also assures business continuity. Our information security strategy reflects TGS' dependency and risk relating to different types of information, where we ensure that data and information throughout its lifecycle are dealt with according to the sensitivity and business continuity criticality. TGS' information security standards facilitate the continuous avoidance of cyber security breaches and mitigate the effects of minor incidents. Employees must act with caution when handling electronic information from external sources and report any suspicions of security breaches, virus or hacking attempts to the IT Department.

### 3.3 Data Privacy

TGS respects and is committed to protecting the privacy rights of our employees and everyone with whom we do business. Data privacy and data protection laws safeguard an individual's personal or private data. Personal data is broadly defined as any information related to an identified or identifiable person, such as name or contact details. Sensitive personal data, such as race or ethnic origin, health data, or criminal behavior is subject to more stringent data

protection requirements. TGS will only process personal data for appropriate purposes, to the extent allowed, and in accordance with applicable laws. As a TGS employee, if you have access to or are involved in the collection of personal data, whether that of employees or other individuals, you are responsible for knowing and understanding TGS' data protection policies and procedures as well as the law. Further information on how TGS processes personal data is set out in our Data Privacy Policy available on [www.tgs.com](http://www.tgs.com).

### 3.4 Intellectual Property

TGS' inventive ideas and technology, as well as our brand, are intellectual property assets that require care in their use and treatment and must be protected. Intellectual property includes patent rights, utility models, trademarks and service marks, domain names, copyright (including copyright of software), design rights, database extraction rights, right in know-how or other confidential or proprietary information, and rights under IP-related agreements. Our geophysical and geological data, processing algorithms and other methods and processes used in our business generally constitute intellectual property rights. It is also important that we respect and avoid infringing upon the intellectual property rights of others by verifying we have all requisite permissions to use the work prior to any use, as any infringement may impact our brand and our business.

In accordance with applicable law, TGS is legally entitled to all rights in ideas, inventions and works of authorship relating to its business that are made by employees during the scope of their employment with TGS or using the resources of TGS ("Employee Developments"). You are required to promptly disclose all Employee Developments to your supervisor and TGS' Legal Department and execute the necessary documentation to ensure that TGS has ownership in and may obtain legal protection for all Employee Developments.

### 3.5 Proprietary & Other Confidential Information

As TGS operates in extremely competitive markets, you should be aware that proprietary information and trade secrets must be safeguarded in the same way that all other important TGS assets are protected. Trade secrets include, but are not limited to, information concerning (i) sales, pricing terms or structures; (ii) commercial terms and contract negotiations; (iii) products, technology, and services that are being developed; and (iv) any prospective TGS acquisition or divestiture; and such information must be held in the strictest confidence.

Anyone dealing with TGS' trade secrets must exercise reasonable and prudent care in order to avoid inadvertent or

inappropriate disclosure. This information must not be used in any way other than as required in performing your duties as an employee and never for personal gain or the benefit of others. These confidentiality obligations remain after your employment with TGS has ended.

You may also be entrusted with the trade secrets or confidential information of customers and suppliers or in possession of the trade secrets of a former employer, and in those situations, you should protect those trade secrets, adhere to all contractually prescribed standards, and consider that information to be confidential, even from other TGS employees.

Employees are prohibited from gathering competitive business intelligence via improper means or breach of confidentiality, and must carefully consider how, where and with whom TGS-related matters are discussed. All files, records and reports acquired or created in the course of employment are the property of TGS. Originals or copies of such documents may be removed from TGS' offices for the sole purpose of performing your employment duties to TGS and must be returned at any time upon request. Any misuse or improper disclosure of proprietary or confidential information in relation to TGS' business must be reported to the Legal or Compliance Department.

### **3.6 Financial and Business Records and Reporting**

An important part of ensuring that TGS is operating in accordance with the law and regulatory requirements is maintaining accurate books and records and effective internal controls. It is essential to TGS' reputation and credibility that our financial reporting is accurate and complete and our business dealings are transparent. TGS' books and records include information created or received as evidence of a business activity, or required for legal, tax, regulatory or accounting purposes, or of importance to TGS' business or corporate records, whether in physical or electronic form. We do not tolerate false or misleading entries into our accounts or any other intentional act that may result in a material misstatement of our finances. TGS expects you to exercise the highest standard of care when preparing business, operations or financial records on behalf of TGS.

TGS' internal controls are intended to prevent and detect mismanagement or misappropriation of our funds and assets and to effectuate our compliance with applicable laws. Any accounting adjustments that materially depart from financial accounting standards required by the Oslo Stock Exchange (Oslo Børs) must be approved by the Board of Directors of TGS and reported to TGS' independent auditors. In addition, all material off-balance-sheet transactions, arrangements and obligations, contingent or otherwise, and other relationships of TGS with unconsolidated entities or other persons that may have material current or future effects on the financial condition, changes in financial condition, results of operations, liquidity, capital expenditures, capital resources or significant components of revenues or expenses must be disclosed to the audit committee and TGS' independent auditors.

We also have an obligation to maintain our business activities to preserve our corporate memory and meet legal and regulatory requirements, and to this end, TGS has established email and document retention procedures. Records that are deemed vital to the ongoing operation of the business should be identified, appropriately safeguarded, and retained in accordance with TGS' procedures. When litigation or investigations occur, the Legal Department will notify the appropriate persons or departments and direct that relevant categories of documents be labeled for retention until further notice. Destruction of records should take place only in compliance with TGS' policies in order to avoid any inference that any document was destroyed in anticipation of a specific problem.

No employee should make statements about TGS beyond publicly disclosed information, and all inquiries from the media, financial analysts, shareholders and investors should be directed to the CFO and the Investor Relations Department.

## TGS OPERATIONS

### 4.1 Anti-Corruption

Corruption undercuts legitimate business activities and relationships and exposes both companies and individuals to legal and reputational damages. TGS has zero tolerance for corruption, bribery, or trading in influence and is committed to operating in an open and transparent manner. No one acting on behalf of TGS may accept or pay bribes, kickbacks, or any other improper payments, including facilitation payments. A facilitation payment is a minor payment to induce a government official to expedite or secure performance of a routine duty which that person is already obligated to perform and where such payment would exceed what is properly due. Everyone representing TGS must comply with all applicable antibribery and anticorruption laws, including the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, and the OECD Convention on Combating Bribery of Foreign Public Officials in International Business.

All engagements with government or public officials must be conducted in accordance with the local law as well as the specific rules and regulations that pertain to that government agency. Government or public officials include (i) any employee of the government (local, state, or national) or of a company wholly or partially controlled by the government; (ii) an official of a political party; (iii) an employee or official of an international organization; or (iv) an immediate family member of any of the aforementioned. TGS employees must conduct themselves in a manner that avoids any dealings or activities that may be perceived or appear as attempts to influence public officials in the performance of their duties. Further details are set out in TGS' Anti-Corruption Policy available on [www.tgs.com](http://www.tgs.com).

## 4.2 Suppliers, Consultants & Business Partners

Third parties, such as suppliers, consultants and partners, are essential to our ability to operate and succeed in a global arena. Trust, transparency and fair dealing are crucial elements of these business relationships, as they can expose us to legal, operational, and reputational liability. We expect all third parties we do business with, whether they are our partners, our vendors or suppliers, or our agents or consultants, to adhere to ethical standards consistent with TGS' standards, abide by all applicable laws, respect internationally recognized human rights, and not engage in any anticompetitive, corrupt or improper activities.

Certain types of third parties, such as agents, consultants, lobbyists, or local business partners, may pose a greater risk depending upon the nature of the work being done or the geographic region where the work is being performed. As a result, these third parties face greater scrutiny through enhanced due diligence, ongoing monitoring, and contractual obligations. TGS employees who wish to engage, retain, or work with these types of third parties are responsible for (i) ensuring that the third party undergoes the appropriate due diligence and monitoring procedures in accordance with TGS' policies and procedures, (ii) ensuring that the third party understands and complies with their obligations to TGS by entering into an agreement on terms acceptable to TGS Legal and Compliance Departments, (iii) monitoring the third party's activities on behalf of the company, and (iv) reporting any behavior by these third parties that fails to meet TGS' standards.

## 4.3 Gifts, Hospitality & Entertainment

Business relationships may be built and strengthened through legitimate networking and social activities. However, we must also be mindful that giving and accepting business courtesies may also be regarded as corruption in certain situations. TGS' aim is to deter givers and recipients of business courtesies from seeking or receiving special favors from TGS employees. To that end, business courtesies should never be given or received in return for a special outcome or decision if it may unduly influence any decision you might make on behalf of TGS. Business courtesies include, but are not limited to, gifts, meals, entertainment, trips, travel, accommodation, services, prizes, or any other gratuitous item, event, benefit, or item of value received from or offered to any person in connection with TGS business. Only legitimate, modest and transparently reported gifts and entertainment that are unrelated to the decision-making process may be offered, provided or accepted.

If you have any questions or concerns regarding any business courtesies you have been offered or received, or that you wish to provide, contact the Compliance Department.



## 4.4 Anti-Money Laundering

Money laundering involves hiding the proceeds of crime in legitimate business dealings or using legitimate funds in support of criminal activities, including terrorism, tax evasion and corruption. Money laundering does not just involve cash proceeds, but includes all forms of assets, including real estate and intangible property that is derived from criminal activity. Money laundering presents a risk for all companies, and TGS will comply with all applicable anti-money laundering laws. For these reasons, it is important that TGS has measures in place that enable it to know who it does business with and ensures that these individuals and entities are not engaged in any form of criminal activity. It is also important that you be aware and alert to any possible exploitation (including unusual payment transactions and invoicing and banking arrangements) and report any suspicious conduct to the Compliance or Legal Department.

## 4.5 Trade Compliance, Sanctions & Anti-Boycott

Trade controls, economic sanctions, and anti-boycott laws are tools used by governments like the United States and governing bodies like the European Union to further foreign policy and national security objectives. These regulations may include embargoes, trade restrictions, or licensing requirements that may (i) impact who we do business with and where we can do business; (ii) prevent us from importing or exporting goods or services to certain entities, individuals or regions; (iii) require us to obtain licenses or permits to import or export goods or services; or (iv) prohibit our compliance with aspects of other countries' boycotts. Failure to abide by trade controls and economic sanctions may result in fines, delays in business or operations, seizure of goods, and damage to TGS' reputation as well as penalties against TGS and the individuals involved. TGS abides by all applicable trade controls and economic sanctions, and expects its employees to be aware of these requirements and how they relate to their responsibilities to the company. Employees must ensure that there is no export of any controlled item, software, service, technology or data unless permitted under license or otherwise authorized by law and ensure business transactions do not violate applicable trade sanctions or anti-boycott laws.

Questions regarding trade controls or economic sanctions should be directed to the Compliance Department.

## 4.6 Conflict Areas

As TGS is on the forefront of exploration, occasionally we may have the opportunity to do projects in regions or areas subject to conflict or strife. TGS must be sensitive to the cultural or political climate in all the areas in which we operate

and not take action to further any instability or hostilities. Before TGS engages in business or projects, it is important that the TGS leader for the project consults with the Legal and Compliance Department to assess the risk.

## 4.7 Antitrust & Fair Competition

Antitrust and fair competition laws are in place to ensure that markets for goods and services operate competitively and efficiently, so that customers enjoy the benefit of open competition among their suppliers, and sellers similarly benefit from competition among their purchasers. These laws prohibit “restraints of trade”, which is certain conduct involving competitors, partners, customers or suppliers in the marketplace, and violations of antitrust laws may subject the companies and individuals involved to civil or criminal penalties. TGS believes it will prosper in a marketplace free of collusion and by engaging in fair business conduct, and strict compliance with antitrust and competition laws around the world is essential.

TGS will not tolerate anyone engaging in illegal, anticompetitive behavior such as price-fixing, bid rigging, allocation of customers, territories or markets, boycotting arrangements, or monopoly practices on behalf of the company. The sharing of commercially sensitive information, including specific contract terms, pricing or project details, with a competitor may be viewed as anti-competitive conduct and implicate antitrust laws. Further, while TGS is generally free to decide whether it will do business with a particular supplier, customer or competitor, it may be a violation of fair competition laws if two or more companies jointly agree to boycott or not do business with a company. Therefore, you may never, without first consulting the Legal Department, agree or share any TGS information with any competitor: (i) on prices or the timing or method of price adjustments (up or down); (ii) the terms of sale or delivery to be offered customers; (iii) the markets or customers in which either company will or will not sell; (iv) who will submit bids to customers; or (v) to boycott or not do business with customers, suppliers or vendors. If you do meet with competitors on behalf of TGS, it is also important to accurately document the purpose and nature of those communications and the topics discussed.

TGS may collaborate with one or more competitors on projects, in the form of a joint venture or partnership. It is important that all joint ventures, partnerships or other collaborations with competitors, including suppliers who may also be viewed as competitors, are discussed with and reviewed by the Legal Department from the beginning and throughout the relationship to ensure fair dealing and business conduct and compliance with applicable antitrust and fair competition laws.

TGS may also participate in various trade organizations and industry events, as these serve important purposes such as coordinating efforts on lobbying government agencies, furthering industry initiatives and protecting the health and

safety of our customers and employees. Such activities are permitted under antitrust laws so long as the discussions do not result in any agreements or arrangements among competitors that impair competition. If, during a trade organization meeting or industry event, you become concerned that anti-competitive behavior is being discussed, you must immediately remove yourself from the meeting and notify the Legal and Compliance Departments.

Any questions regarding antitrust laws should be directed to the Compliance or Legal Departments, and you are obligated to report any conduct that may be seen as anticompetitive, whether by TGS or a competitor, to the Hotline or the Compliance Department.

## 4.8 Tax

TGS operates with a range of legal entities across several tax jurisdictions with different regulatory schemes and is exposed to different kinds of taxes, including income taxes, withholding taxes, sales taxes, customs and social security taxes. TGS is committed to complying with the letter and spirit of tax laws and regulations in all the jurisdictions in which it operates, paying taxes where and when legally due, and minimizing tax expense based on strong professional integrity and in compliance with tax laws and regulations. We ensure timely and accurate reporting and filings of tax returns, carefully evaluate tax risk in tax planning and advisory, and structure each project to optimize tax consequences. We ensure that all tax planning has commercial and economic substance, and we have a proactive approach to tax audits.

## 4.9 Environment

TGS is committed to leading the industry in minimizing the impact of its activities on the environment and preventing pollution. Our goal is zero spills and minimal negative impact on the environment. We will ensure that all operations are undertaken in accordance with applicable regulations and executed with respect for other users of the oceans in a manner that minimizes impacts on marine life and habitats. We will work to achieve this commitment by:

- Assessing our impact on the environment;
- Incorporating climate, biodiversity, and other environmental risk assessments into business and operational strategy;
- Planning operations to minimize any impacts (including responsible use of energy, minimizing

our acoustic impact through careful planning and best practices, application of circular economy and waste reductions principles, and safe handling and disposal of waste);

- Monitoring our performance against approved environmental management plans throughout the lifecycle of a project;
- Complying with applicable laws, regulations and guidance;
- Monitoring the environmental performance of our contractors;
- Restoring all project sites to reasonably acceptable levels;
- Seeking means for continuous improvement, including participating in environmental programs and sharing best practices;
- Ensuring a transparent and respectful dialogue with local communities and fisheries where our activities and interests overlap; and
- Sharing oceanographic data and knowledge in our possession for non-commercial use in oceanographic research

All personnel have an important part in achieving our environmental goal, from managers planning and supervising operations to workers following the procedures put in place. Further information can be found in our Environmental Policy available on [www.tgs.com](http://www.tgs.com).

## 4.10 Energy Transition

TGS acknowledges the need for an energy transition to renewable sources of energy to prevent the most severe consequence of climate change. Where operationally sound, we are committed to collaborating with stakeholders on developing technology and solutions that derisk and promote responsible energy exploration and development by (i) optimizing fleet utilization and survey efficiency, (ii) reducing fuel consumption through drag reduction and technology development, (iii) using digitalization to optimize vessel performance, (iv) supporting climate-change research by sharing oceanographic and atmospheric data, (v) pursuing opportunities to develop sustainable business services that support the energy transition, and (vi) encouraging innovation and collaboration to face sustainability challenges.



## 4.11 Property & Assets

TGS owns and leases valuable assets, and provides you with facilities, equipment, computers, software, information and other assets so that you may successfully perform your job. Because you are entrusted with TGS' property and assets, you are responsible for handling them with due care and safeguarding those assets from loss, theft and misuse. TGS does not permit its employees to misuse any of our assets or property for personal benefit or any financial gain in conflict with TGS' interest. You may not use TGS' property, facilities or resources for solicitation or distribution activities unrelated to your services to TGS, and TGS does not permit persons not employed by the company to solicit TGS employees for any purpose on TGS premises. When using IT equipment, employee must exercise good judgment and only use such for its intended purpose and primarily for TGS business use. Installation or use of unlicensed software on TGS IT equipment is prohibited.

The taking of TGS' property without permission is regarded as theft, and any individual found to be engaging in, or attempting, theft of any property of TGS will face disciplinary action, which may include civil or criminal proceedings.