



Anti-Corruption Policy

To carry out its mandate to provide our clients with the best possible service, **IMC Geophysical Services Limited (IMC GSL)** needs to ensure that the service that we provide reaches them in the most efficient, effective and transparent manner possible. There is no room for fraud and corruption, which divert resources elsewhere.

In 2017 IMC GSL adopted an **anticorruption policy**. The policy's goal is to prevent fraud and corruption in IMC GSL supported programs and projects, and in contracts at the local, national, regional and international levels. The policy affirms that:

IMC GSL shall apply a zero-tolerance policy where it has determined, through an investigation performed by IMC GSL or another competent entity, that fraudulent, corrupt, collusive or coercive actions have occurred in projects operated by IMC GSL, and it shall enforce a range of sanctions in accordance with the provisions of applicable IMC GSL rules and regulations and legal instruments. 'Zero tolerance' means that IMC GSL will pursue all allegations falling under the scope of this policy and that appropriate sanctions will be applied where the allegations are substantiated. This policy applies to IMC GSL activities whether supervised directly by the IMC GSL or by a cooperating institution.

IMC GSL will continue to improve its internal controls, including controls inherent in or pertaining to its project activities, so as to ensure that it is effective in preventing, detecting and investigating fraudulent, corrupt, collusive and coercive practices. IMC GSL shall take all possible actions to protect from reprisals individuals who help reveal corrupt practices in its project or grant activities and individuals or entities subject to unfair or malicious allegations.

This policy is in line with the policies adopted by the other international geophysical institutions.

For IMC GSL staff and individuals representing IMC GSL:

IMC GSL shall apply a zero-tolerance policy where it has determined through an investigative process that its staff, consultants or individuals acting as representatives of the IMC GSL have engaged in fraudulent, corrupt, collusive or coercive practices. 'Zero tolerance' means that IMC GSL will pursue all allegations falling under the scope of this policy and that appropriate sanctions will be applied where the allegations are substantiated. IMC GSL shall enforce a range of disciplinary measures and sanctions for all such cases, in accordance with applicable IMC GSL rules and regulations and contractual provisions. Such measures will include referral to the competent national authorities where warranted. Where such cases concern individuals employed by another entity, IMC GSL shall take all possible steps to ensure that the other entity takes appropriate actions in a manner consistent with this policy. IMC GSL will continue to improve its internal controls so as to ensure that it is effective in preventing, detecting and investigating fraudulent, corrupt, collusive and coercive practices pertaining to its staff, consultants or its representatives. It shall take all possible actions to protect from reprisals individuals who submit allegations of corrupt practices in its activities and operations and individuals subject to unfair or malicious allegations."

Fraud and corruption include, but are not limited to:

- corrupt practice - offering, giving, receiving, or soliciting, directly or indirectly, anything of value to influence improperly the actions of another party
- fraudulent practice - any act or omission, including a misrepresentation, that knowingly or recklessly misleads, or attempts to mislead, a party to obtain a financial or other benefit or to avoid an obligation
- collusive practice - an arrangement between two or more parties designed to achieve an improper purpose, including influencing improperly the actions of another party
- coercive practice - impairing or harming, or threatening to impair or harm, directly or indirectly, any party or the property of the party to influence improperly the actions of a party

Keith Latham

General Manager

1st January 2018