

# DUE DILIGENCE POLICY

Geofizyka Torun actively participates in worldwide geophysical prospecting. Our policy is to do business only with legitimate, law-abiding companies offering high quality products and services. This policy and due diligence procedures that implement it, are founded upon our general standards of business conduct and a commitment to:

- Conduct our business in a culture of honesty and opposition to fraud and corruption;
- Maintain high moral, ethical and social standards in our business and activities;
- Maintain proper business relationships with all individuals.

We will implement this policy through a comprehensive management system. This system will carry forward the general standards of business conduct set forth above and will direct our compliance procedures both internally and in our relations with customers and business partners.

In that regard we commit to the following:

1. We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:

- torture, cruel, inhuman and degrading treatment;
- forced or compulsory labor;
- child labour as defined in Convention 182 of the International Labour Organization;
- human rights violations and abuses;
- war crimes, violations of international humanitarian law or crimes against humanity.

2. We will not deal with, and will immediately discontinue engagement with companies where we identify a reasonable risk that they are committing abuses described above, or sourcing from any party committing or linked to such abuses.

3. We will not deal with, and will immediately discontinue engagement with companies where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups.

4. We will not attempt to improperly influence others or offer, promise, give or demand bribes or kickbacks in any form, and will resist their solicitation, and will not permit Company funds, assets or property to be used to benefit any individuals, including government officials, our customers, contractors and suppliers illegally or in ways that violate this policy.

5. We will support efforts and contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to oil and gas exploration.

6. We require our employees, agents, consultants, and business partners to comply with this policy, and will enforce it with appropriate disciplinary measures, up to and including termination of employment or contracts.



Piotr Antonik  
President, CEO

Toruń, 1.07.2015