

Corporate Social Responsibility Policy

We at IOT Group understand that our organization, our business our workforce our suppliers and customers are a part of the communities that we operate in and hence we do have a responsibility to ensure the sustainability of the community as a whole – and also abide by the rules and regulations of the community.

We are committed to build positive relationships that contribute to the economic development and social wellbeing of communities where we operate. We believe that our strong commitment to the highest standards of corporate citizenship and sustainability strengthens our business, our workforce and the communities where we operate. To this effect we have developed and implemented a Corporate Social Responsibility Policy and Procedure to guide us in our day to day work

OUR SOCIAL ENVIRONMENT

We realize that we are an integral part of the communities that we operate in and that it is our responsibility to ensure the sustainability and overall improvement of the community.

- We identify and assess our contributions/impacts to social and cultural changes in the areas where we operate and develop appropriate strategies to respect the rights and cultures of local communities
- We aim to develop a good relationship with our partners and suppliers and to support them in their growth and development
- We are committed to respecting all human rights where we operate
- We are committed to provide our customers with quality services ensuring that all the requirements of the customers are collected and are met wherever it's reasonable possible.

PROFESSIONAL STANDARDS & BUSINESS CONDUCT

The main principles of our professional standards and Business Conduct are:

- We conduct our business to the highest standards of business and personal integrity
- We are committed to transparency and good governance. We believe in fair and honest competition, and endorse and participate in all efforts which are designed to combat corruption and promote the rule of law (Please also refer to our Anti-corruption Policy and Procedure)
- We endorse and respect the Universal Declaration of Human Rights
- We endorse and implement international voluntary initiatives designed to protect the environment (please refer to our Environmental Policy).
- We expect our contractors and suppliers to respect our Code of Business Conduct and Ethics and related policies, or to adopt equivalent standards, and to train their employees accordingly

Procedures

IOT Group undertakes that those associated with the organization will conduct themselves ethically and in accordance with what are generally accepted as "standard business practices." The increasingly multifaceted relationships that have evolved between IOT Group and the numerous individuals, companies, and other groups, with which it deals,

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require that persons representing the IOT Group exercise a high degree of personal responsibility, integrity, and sound judgment. Each employee should be familiar with the policies and procedural guidelines that cover the business activities that are his/her responsibility. This requirement will vary significantly depending on the employee's position. It is hoped that by clearly setting forth the standards of behavior that IOT Group expects from its employees, any misunderstandings will be minimized, and any doubtful situation can be brought to the attention of the responsible manager and resolved.

Our people

IOT Group realize that our people are the most important asset that our organization has and believes that the growth of our company should also result in the growth of our employees both socially as well as intellectually. The principles of our people's policy are:

- We are committed to diversity and provide equal employment opportunities to all employees and job applicants regardless of race, color, sex, age, sexual orientation, creed, national origin or disability.
- We do not tolerate any form of workplace harassment including sexual harassment of an employee or employment candidate
- We recognize and respect our employees' right to join associations and choose representative organizations for the purpose of engaging in collective bargaining in a manner that is consistent with applicable laws, rules, regulations and local customs
- We are committed to providing challenging and rewarding career opportunities to ensure that we have a skilled, capable and energized workforce
- We provide learning opportunities for employees to maximize their potential and ensure that the company achieves its business objectives
- The health and safety of our employees and neighbors is a paramount concern.

Policy against Workplace Harassment and Discrimination

IOT Group is committed to providing a work environment for all employees that is free from sexual harassment and other types of discriminatory harassment. Employees are expected to conduct themselves in a professional manner and to show respect for their co-workers.

IOT Group commitment begins with the recognition and Acknowledgment that sexual harassment and other types of discriminatory harassment are, of course, unlawful. To reinforce this commitment, IOT Group has developed a Code of Conduct procedure against harassment and a Whistleblower policy for employees who have been subjected to or witnessed harassment. These procedures and policy applies to all work-related settings and activities, whether inside or outside the workplace, and includes business trips and business-related social events. IOT Group property (e.g. telephones, copy machines, facsimile machines, computers, and computer applications such as e-mail and Internet access) may not be used to engage in conduct that violates this policy and procedures.

Prohibition of Sexual Harassment: IOT Group Code of Conduct procedure against sexual harassment prohibits sexual advances or requests for sexual favors or other physical or verbal conduct of a sexual nature, when: (1) submission to such conduct is made an express

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or implicit condition of employment; (2) submission to or rejection of such conduct is used as a basis for employment decisions affecting the individual who submits to or rejects such conduct; or (3) such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile, humiliating, or offensive working environment

While it is not possible to list all of the circumstances which would constitute sexual harassment, the following are some examples: (1) unwelcome sexual advances -- whether they involve physical touching or not; (2) requests for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits, or continued employment; or (3) coerced sexual acts.

Depending on the circumstances, the following conduct may also constitute sexual harassment: (1) use of sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's sex life; (2) sexually oriented comment on an individual's body, comment about an individual's sexual activity, deficiencies, or prowess; (3) displaying sexually suggestive objects, pictures, cartoons; (4) unwelcome leering, whistling, deliberate brushing against the body in a suggestive manner; (5) sexual gestures or sexually suggestive comments; (6) inquiries into one's sexual experiences; or (7) discussion of one's sexual activities.

While such behavior, depending on the circumstances, may not be severe or pervasive enough to create a sexually hostile work environment, it can nonetheless make co-workers uncomfortable. Accordingly, such behavior is inappropriate and may result in disciplinary action regardless of whether it is unlawful.

Prohibition of Other Types of Discriminatory Harassment: It is also against IOT Group policy to engage in verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his or her race, color, gender, religion, sexual orientation, age, national origin, disability, or other protected category (or that of the individual's relatives, friends, or associates) that: (1) has the purpose or effect of creating an intimidating, hostile, humiliating, or offensive working environment; (2) has the purpose or effect of unreasonably interfering with an individual's work performance; or (3) otherwise adversely affects an individual's employment opportunities.

Depending on the circumstances, the following conduct may constitute discriminatory harassment: (1) epithets, slurs, negative stereotyping, jokes, or threatening, intimidating, or hostile acts that relate to race, color, gender, religion, sexual orientation, age, or disability; and (2) written or graphic material that denigrates or shows hostility toward an individual or group because of race, color, gender, religion, sexual orientation, age, national origin, or disability and that is circulated in the workplace, or placed anywhere in IOT Group premises such as on an employee's desk or workspace or on IOT Group equipment or bulletin boards (including digital boards and web sites -- whether internal or external sites, as well as posting on social media). Other conduct may also constitute discriminatory harassment if it falls within the definition of discriminatory harassment set forth above.

Reporting of Harassment: If you believe that you have experienced or witnessed sexual harassment or other discriminatory harassment by any employee of an IOT Group of company, you should report the incident immediately to your supervisor or to the country manager. Possible harassment by others with whom IOT Group has a business

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relationship, including customers and vendors, should also be reported as soon as possible so that appropriate action can be taken.

IOT Group management will promptly and thoroughly investigate all reports of harassment as discreetly and confidentially as practicable. The investigation would generally include a private interview with the person making a report of harassment. It would also generally be necessary to discuss allegations of harassment with the accused individual and others who may have information relevant to the investigation. IOT Group goal is to conduct a thorough investigation, to determine whether harassment occurred, and to determine what action to take if it is determined that improper behavior occurred.

If IOT Group management determines that a violation of this policy and procedure has occurred, it will take appropriate disciplinary action against the offending party, which can include counseling, warnings, suspensions, and termination of employment. Employees who report violations of this policy and procedure, and employees who cooperate with investigations into alleged violations of this policy will not be subject to retaliation. Upon completion of the investigation, IOT Group management or local management will inform the employee who made the complaint of the results of the investigation.

Compliance with this policy is a condition of each employee's employment. Employees are encouraged to raise any questions or concerns about this policy or about possible discriminatory harassment with the Manager or Group CEO. In the case where the allegation of harassment is against the local Manager please notify the CEO. If the allegation of harassment is against the CEO please notify the local Manager whom will then notify the Group board of directors.

Promotions and Transfers

In filling positions at the IOT Group of companies, preference is given whenever possible to qualified persons currently employed at IOT Group and its subsidiaries, with factors such as ability, experience, potential for growth, and the affirmative action goals taken into consideration. Employees are encouraged to express interest in positions for which they believe they are qualified. However, limitations may exist due to individual nations restrictions on labor and people movement.

Employment of Relatives and friends

Employment of relatives and friends of our employees are permitted, except in circumstances where an appointment would place related people in supervisory and subordinate roles within the same office or department, or in a situation where influence could be exerted, directly or indirectly, on future decisions concerning the status of employment, promotion, or compensation. However, all requirements for qualifications and fit for employment should be adhered to.

Ulf Eide
CEO IOT Group