



Code of Conduct and Ethical Guidelines

Background.

This Code of Conduct illustrates what we expect of our employees, suppliers and business partners regarding business conduct, human rights, workers' rights, the environment, and corruption. Our Code of Conduct and Ethical Guidelines set out the rules of conduct of the CodeIT Group, its companies and all its employees to counter abuse of power in any way and safeguard workers' rights.

The CodeIT Group companies (herein after "CodeIT") operate across country borders and have a responsibility to act in accordance with the respective country's laws and regulations, culture and international standards for human rights and support the integrity and credibility of development assistance and establish public trust.

Principles.

CodeIT main traits regarding communication and appearance are.

- **Helpful** - Others see that we understand their situation. We get to the bottom of our partners problems and identify solutions.
- **Simple** - Even though we often work with complex systems, dealing with us is easy.
- **Smart** - Our customers themselves must think that what we do is smart, whether we deliver a new and exclusive piece of hardware or a major comprehensive system installation.

General Ethical Provisions.

All CodeIT management and employees must

- act in accordance with CodeIT core values, national laws and regulations.
- demand respect for human rights, e.g. that work should be carried out without discrimination based on race, gender, social status, sexual orientation, disability, religious or political affiliation.
- respect and adhere to the laws and regulations in all countries we do business. All employees shall also respect local culture and religion if these are not in conflict with the

UN's international human rights standards.

- combat corruption and other misuse of aid funds or CodeIT funds to enrich oneself, one's organization or a third party by giving or receiving gifts, travels, discounts, bonuses or other benefits that could potentially influence one's own or the recipient's actions in service.
- Any violation of the code of conduct should be immediately be reported to the person responsible for compliance. All complaints will be thoroughly processed by the compliances officer. All employees can report anonymously to the compliance officer if necessary, and no retaliatory action will ever be taken against the employee.

Wages, gender equality and equal pay.

CodeIT adhere to the ILO Convention No. 138. Wages and benefits paid for a standard working week shall as minimum meet national legal standards or industry standards, whichever is higher. All workers shall sign written contracts with detailed information and working hours shall comply with national laws and benchmark industry standards. Workers shall have a minimum of one day off per seven-day period, and overtime shall be voluntary, paid for and not exceed the limits of national rules and legislation. Workers have the right to join or form trade unions of their own choosing and to bargain collectively.

CodeIT follows the principle of gender equality and equal pay and does not accept any form of discrimination in the workplace in accordance with ILO Conventions Nos. 100 and 111 and the UN Convention on Discrimination Against Women. There will be equal employment opportunities and pay structure for men and women. Compensation for maternity leave for women employees will be granted maternity leave of a minimum three months, or according to local regulations, whichever is longer. Mentoring programs are put in place for new employees.

CodeIT adhere to international conventions, national law and regulations regarding regular employment. The use of short term contracting, such as contract labor, casual labor, or day labor, shall be avoided.

CodeIT does not accept child labor and adhere to the UN Convention on the Rights of the Child, ILO Conventions Nos. 138, 182 and 79, and ILO Recommendation No. 146.

Sexual.

- Any instances of using violence or threatening behavior to perform sexual acts are strictly prohibited and are grounds for immediate dismissal.
- Any form of sexual abuse is strictly prohibited, this includes but are not limited to abuse your position, relationships, or a person's vulnerable position to exploit others sexually or requesting sexual favors.
- Sexual acts with children (persons under 18) regardless of local laws or regulations is strictly prohibited, as is possessing, acquiring or spreading material that contains sexual exploitation of any kind. Such acts will be grounds for immediate dismissal and the case will be reported to law enforcement.
- We strive to provide a welcoming and positive work environment, and any form of unwanted or suggestive behavior should be reported to HR. The offender will be contacted and interviewed, and disciplinary action will vary based on the severity of the infraction.

- Any victim of sexual abuse or harassment will be supported by the company until the matter is resolved, and further on if counseling, treatment or change of workplace/positions is needed.

Working environment and Health and Safety.

The working environment shall be safe and hygienic. Workers shall receive regular and documented health and safety training, and such training shall be repeated for new or reassigned workers. Measures to minimize adverse impacts on human health and the environment shall be taken throughout the value chain. The local environment at the production site or place of business shall not be exploited or degraded. National and international environmental legislation and regulations shall be respected.

Social Sustainability, local suppliers, and the environment.

CodeIT has a strong and continuous focus on social responsibility and seek to buy materials locally where possible and hire local people. Strong emphasis will be given to social and environmental standards in the selection of business partners and suppliers.

Local suppliers of goods and services shall confirm that they understand and adhere to this code of conduct. Suppliers shall also communicate the code of conduct to their sub-suppliers, and to monitor implementation. A supplier must sign the CodeIT Supplier Declaration and be able to document compliance with the code of conduct on CodeIT's request. Such documentation may take the form of self-declaration, follow-up meetings, and/or inspections of the working conditions at production sites. In the event of a breach of the code of conduct, the contract shall be terminated if the supplier remains unwilling to remedy the breach following repeated enquiries.

Environmental sustainability is a core value for CodeIT, and all employees shall respect local culture, customs, and the environment.

Any complaints related to the CodeIT business presence shall be formally logged and processed and shall be addressed in top management meetings. Employees shall also participate in the CodeIT Cross-Cultural awareness and Teambuilding program, where workers from the main office spend time in Viet Nam and vice versa.

Financial Management and Corruption.

Corruption in any form is not accepted, including bribery, extortion, kickbacks and improper private or professional benefits to customers, agents, contractors, suppliers or employees of any such party or government officials. All new employees shall undertake in anti-corruption courses set out by the Company.

Accounts will be audited annually by accountants. Budgets and accounts will be transparent to all project partners and investors and if necessary, to local government offices.

Hospitality and gifts.

CodeIT employees shall never offer or accept illegal or unlawful gifts or other forms of

remuneration to secure business-related or private benefit, or benefit for customers, agents, or suppliers. All employees shall inform his or hers superior when the employee receives invitations or is being offered gift. All gifts shall be registered to the management, and employees may not keep gifts of substantial value. Before responding to hospitality invitations, or when offered gifts, all employees shall consider the nature and motive of the invitation or gift. More precise, one should ask the following questions:

- Is the invitation business related, and what is the estimated cost related to the invitation or gift? Who covers travel costs?
- Are there ongoing strategical processes or negotiation that can be affected by my participation or acceptance of the gift?
- Who is attending the event, or who is offering the gift? And is it the first time the host invites or offers a gift?

Disciplinary actions.

CodeIT may have to take disciplinary actions against employees that repeatedly or intentionally fail to follow our Code of Conduct. Disciplinary actions will vary depending on the violation including:

- Demotion
- Reprimand
- Suspension or termination
- Detraction of benefits for defined or indefinite timespan

We might take legal action in case of embezzlement, corruption, and theft. Any unlawful action such as sexual abuse, violence, sexual exploitation of children, corruption and theft, possession of drugs or other crimes will be reported to the police.