

1. Scope

This policy applies to all operations of iSURVEY Group AS entities. It sets out the minimum standards which iSURVEY expects from staff in their internal and external dealings with colleagues, customers, stakeholders and third parties. The principles encompassed in this policy cover all areas of iSURVEY's operations. The policy has been developed and will continue to be reviewed against and updated by reference to relevant codes of corporate governance and international standards. Among these are the Ten Principles of the United Nations Global Compact, which is supported by iSURVEY.

2. Compliance, Monitoring and Reporting

Compliance with this policy will be continuously monitored. The CEO will report compliance to this policy in the monthly CEO-report to the Board of Directors, and compliance will further be reported to shareholders and stakeholders through iSURVEY's annual report. Each local manager is responsible for ensuring that the principles set out in this policy are communicated to, understood, and followed by all employees, and for ensuring compliance in their area of responsibility.

Employees who reasonably suspect that there has been a breach of this policy must report it to their line manager, senior management, other iSURVEY representative or designated Board member as appropriate. iSURVEY management will support and protect employees reporting any such concerns.

No manager or employee of iSURVEY will be criticized for any loss of business resulting from adherence to the principles set out in this policy.

3. Policy

3.1 Basic Standards of Conduct

- (a) iSURVEY will conduct every aspect of our business with honesty, integrity and openness.
- (b) We will respect human rights and the interests of our employees, customers, suppliers and other third parties.
- (c) We will not promise more than we can reasonably deliver or make commitments we cannot or do not intend to keep.

3.2 Employees

- (a) iSURVEY is committed to creating and maintaining a safe and healthy working environment for its employees.
- (b) We will strive to create a workplace in which there is mutual trust and respect in which every person feels responsible for the performance and reputation of our company.
- (c) We will respect each individual's rights, customs and traditions.
- (d) We will respect the right to freedom of association, and the right to decide whether or not to join a trade union. As such, we will negotiate in good faith with the properly elected representatives of its employees.
- (e) We will work towards achieving a diverse workforce by recruiting, employing and promoting employees only on the basis of objective criteria in order to evaluate the qualifications and abilities needed for the job to be performed.
- (f) We will maintain good communication with employees through our information and consultation procedures.
- (g) We will assist employees in realizing their potential.

3.3 Customers

iSURVEY is committed to providing safe and reliable high quality services with cost competitiveness to its customers through:

- (a) Well trained and experienced offshore and onshore staff.
- (b) Proven systems and processes.
- (c) Honesty and openness in all interactions.

3.4 Shareholders

- (a) iSURVEY will conduct its operations in accordance with the principles of good corporate governance.
- (b) We will strive to create value for our shareholders.
- (c) We will provide timely, regular and reliable information on the business to our shareholders.

3.5 Subcontractors and Business Partners

- (a) We aim to develop strong relationships with our subcontractors, business partners and other third parties based on mutual trust, understanding and respect.
- (b) In all dealings, we expect our subcontractors and business partners to adhere to business principles consistent with our own.
- (c) iSURVEY companies will conduct their operations in accordance with the principles of fair competition and applicable regulations.

3.6 Compliance with Law

All members of iSURVEY will comply with the laws and regulations applicable wherever they do business. Appropriate training in these matters will be provided for employees as necessary.

3.7 Anti-Corruption

- (a) iSURVEY shall not offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for business or financial gain. Furthermore, no employee may offer, give, seek or receive any gift or payment which is, or could be construed as such. If an employee is in any doubt as to whether he or she may accept an offer, that employee should discuss the issue with his or her manager.
- (b) iSURVEY accounting and other records and supporting documents must accurately describe and reflect the nature of the underlying transactions.
- (c) No undisclosed or unrecorded account, fund or asset will be established or maintained.
- (d) iSURVEY will not facilitate, support, tolerate or condone any form of money laundering.
- (e) All employees shall familiarize with the Norvestor Anti-Corruption Policy and sign the document. The signed document shall be archived in the HR employee file.

3.8 The Environment

- (a) iSURVEY is committed to making continuous improvement in iSURVEY environmental management.
- (b) We will work with our partners to promote environmental care and encourage good practice.

3.9 Community Involvement


iSURVEY strives to be a good corporate citizen and to fulfil our responsibility to the societies and communities in which we operate.

3.10 Conflicts of interest and confidentiality

- (a) Whilst iSURVEY respects the privacy of its employees, all iSURVEY employees are expected to avoid personal activities and financial interests which could conflict with their responsibilities to iSURVEY.
- (b) iSURVEY employees and consultants must not seek gain for themselves or others through misuse of their positions or company property.
- (c) All actual and potential conflicts, including those arising from the activities or interests of close relatives or partners should be disclosed and discussed with an employee's line manager.
- (d) Information received by anyone in the course of his or her employment must not be used for personal gain or for any purpose other than that for which it was given.
- (e) Where information is confidential, that confidentiality must be respected.

3.11 Purchase of sexual services

Purchase of sexual services is forbidden by Norwegian law. The prohibition also applies to employees when travelling in other countries on behalf of iSURVEY.

A blue ink signature of Øivind Røegh, consisting of several overlapping loops and lines.

Øivind Røegh, CEO