

**COMPANY LETTER HEAD**

14<sup>th</sup> January 2020

**H.E. António Guterres**  
Secretary-General  
United Nations  
New York, NY 10017  
USA


**Sub.: Communication on Progress (CoP) to the United Nations  
Global Compact (UNGC) – reg.**

Dear Mr. Secretary-General,

I would like to express our continued support to the initiatives and principles of the United Nations Global Compact (UNGC). A description of the policy initiatives already taken by Iron Systems Inc. along with implementation and measurable outcomes to support achieving Sustainable Development Goals (SDGs) and ten Principles of UN Global Compact on human rights, labour, environment and anti-corruption are enclosed herewith in the form of Communication on Progress (CoP) for UN Global Compact.

2. With this communication, we submit our first Communication on Progress (CoP) on adopting and implementing principles of UNGC.

Sincerely yours,

DocuSigned by:  
  
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**Mr. Harvey Bath  
Director**

## INTRODUCTION

Iron Systems Inc. is a leading provider of purpose-built, application-specific, server-appliance and embedded systems platforms. We provide product lifecycle management services for networking, storage, security, medical and communications markets worldwide. Our team is best known for our innovative customer specific solution, integrations, supply chain management expertise, and unique deployment capabilities – all backed by global technical support and maintenance service. For 15 years, customers have trusted us for our innovative problem solving combined with our “IRON Holistic” business model for design, engineering, supply chain management, integration, forward/reverse logistics, and global support services.

Iron's mission is to be the preferred electronics manufacturing services provider that builds long-term relationships and creates value-added solutions. With more than 15+ years in electronics design, integration and logistics, our steady growth has enabled us to establish a worldwide presence. Pivotal to this success is our commitment to long term alliances which continue to flourish due to our dependability, lowest total cost of ownership, assured supply continuity and consistent delivery of leading-edge products. The result, we've found, is that people trust us. And whatever the future brings, we will endeavour to nurture that trust by maintaining our strong business ethics and absolute commitment to quality.

Our well defined values also imbibe the essence of responsible business practices:

- We act as one global team with one vision, living our Values;
- We combine our strengths and diversity to drive success for our customers and for ourselves;
- We encourage and reward the contributions of everyone on the team. Our communication with each other is clear, timely, honest and accurate. We take pride in our achievements and celebrate our successes;
- Our performance culture allows us to anticipate our customers' requirements with speed, agility and flexibility;
- Our business partners are recognized as an extension of our own team;
- We strive for creative break-throughs;
- We encourage creativity and embrace the dynamic of change;
- We generate innovative solutions to thrive in a changing business environment. We take initiative and strive for simplicity;
- We create, adapt and continuously enhance tools and processes to enable our customers' success without sacrificing quality;
- We deliver on our promises with integrity, respect and quality;
- We are committed to providing our employees a rewarding environment of trust, personal growth and work-life balance;
- We attract, retain and develop the highest caliber talent in the industry;
- We treat each other with dignity and fairness;
- We trust each other and are accountable for our results;
- We respect and care for each other as individuals with personal lives;
- We act ethically, with integrity and social and environmental responsibility;



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- We demonstrate our commitment to our customers' business by delivering on our promises;
- We understand our customers' business and see our customers' success as our own;
- We believe in building strong, enduring relationships with our employees, customers, suppliers and communities.

At Iron Systems Inc., we believe that Globalization is promoting the advancement of economies and businesses, but there are negative results as well, particularly more widespread poverty and more environmental degradation. We believe that these problems can only be resolved through the collective action of corporations that are active internationally. At Iron Systems, the entire company, its subsidiaries partners, suppliers, vendors and contractors constitute an eco-system for mutually agreed practices. Iron Systems has developed certain policies which apply on entire eco-system in which it operates.

Iron Systems Inc. believes that we are all responsible for conducting our businesses in a socially, economically and environmentally responsible manner. We base this on the premise that a company is much more than the products and services it sells; the effect a company has on the environment, the people and the communities it serves reflects the company's dedication to being not only a good business, but being a good corporate citizen.

As the ten principles of the UN Global Compact are based upon - Universal Declaration of Human Rights, ILO's Fundamental Principles and Rights at Work, and Principles embodied in the Rio Declaration on Environment and Development. We have already tried that our policies at Iron Systems are sync with such international instruments as far as possible. Our following policies are applicable internally and to the external stakeholders in our value chains wherever applicable:

- a) Anti-discrimination Policy
- b) Business Ethics Policy
- c) Child Labor Prevention Policy
- d) Code of Supplier Conduct
- e) Company cyber security policy
- f) Corporate Social Responsibility Policy
- g) Employee Training and Development Policy
- h) Grievance Procedure Company Policy
- i) International recruitment policy
- j) Occupational or Workplace health and safety policy
- k) Record retention policy
- l) Separation or Termination of Employment Policy
- m) Sexual Harassment policy
- n) Smoke Free Workplace Policy
- o) Working Hours, PTO and Vacation Policy

Under our Corporate Social Responsibility Policy, we have specifically committed ourselves to the UNGC, the policy reads as – "Our company is committed to the United Nations Global Compact. We'll readily act to promote our identity as a socially aware and responsible business."

We are further committed to support and promote ten principles of UN Global Compact through involving them in our policies and practicing them with our value chains. As we strive to further incorporate 10 principles, we have prepared an analysis of the existing policies of Iron Systems already incorporating most of the essence of these 10 principles in this Communication on Progress (CoP) for year 2019 expressing our continued support and adherence to the UN Global Compact.

## **HUMAN RIGHTS PRINCIPLES**

Principle 1: Businesses should support and respect the protection of internationally proclaimed Human Rights within their sphere of influence

Principle 2: Businesses should be certain that they are not complicit in Human Rights abuses

### **Assessment, Policy and Goals:**

At Iron Systems, we respect human rights, provided Policy commitment, trust in Human rights due diligence, and support human rights in all possible forms. We are committed to support and promote human rights through our core business activities in support of UN goals and issues, through strategic social investment, philanthropy and Corporate Social Responsibility, Advocacy and public policy engagement wherever possible, and partnership and collective action. We have explicit policies that protect the human rights of workers in direct employment and throughout our supply chain. In addition to other policies in place, our Supplier Code of Conduct mandates suppliers' requirements, consisting of core tenets of the International Labour Organization's (ILO) fundamental conventions and the United Nations Universal Declaration of Human Rights (UDHR) for suppliers such as – Adherence to all UN and ILO Norms; Use of fair business practices; Safe and Healthy Working Conditions; and Drive continuous improvement.

### **Implementation:**

We provide safe and healthy working conditions at our workplaces, we encourage freedom of association, we ensure non-discrimination in personnel practices. We do not use directly or indirectly forced labour or child labour, we provide access to basic health, education and housing for the workers and their families, we provide decent work conditions.

We make efforts to prevent the forcible displacement of people in communities, we protect the economic livelihood of local communities where we operate, we interact with all levels of government in the countries where we operate to express our views on matters that affect our operations, employees, customers and the communities.

**Measurement of Outcomes:**

We have established a monitoring/tracking system to ensure that our human rights policies are being implemented. We actively engage in open dialogue with stakeholder groups. We do not engage in a business relationship, given the potential adverse human rights impacts of doing so. Following policies at Iron Systems Inc. address the human rights aspects as per the United Nations Global Compact principles on Human rights:

**a) Anti-discrimination Policy**

Our anti-discrimination policy explains how we prevent discrimination and protect our employees, customers and stakeholders from offensive and harmful behaviors. Our company complies with all anti-discrimination laws, including [Title VII of the Civil Rights Act of 1964, Americans with Disabilities Act (ADA) and Age Discrimination in Employment Act (ADEA.)] We explicitly prohibit offensive behavior (e.g. derogatory comments towards colleagues of a specific gender or ethnicity.)

**b) Child Labor Prevention Policy**

Our child labor policy is our position on employing minors and aims to ensure that our company, its subsidiaries and everyone we're connected with follows the law and cares for children's interests.

**c) Corporate Social Responsibility Policy**

As per the policy, proactiveness is every initiative to promote human rights, help communities and protect our natural environment. Our company is dedicated to protecting human rights. We are a committed equal opportunity employer and will abide by all fair labor practices. We'll ensure that our activities do not directly or indirectly violate human rights in any country (e.g. forced labor).

**d) Occupational or Workplace Health and Safety Policy**

Our Occupational / Workplace Health and Safety Policy help us preserve the best possible work conditions for our employees. Every employee has a right to feel safe at work. Our company is committed to follow legal standards and create a hazard-free workplace.

**e) Sexual Harassment Policy**

We won't tolerate sexual harassment in our workplace in any shape or form. Our culture is based on mutual respect and collaboration. Sexual harassment is a serious violation of those principles.

**LABOUR STANDARDS**

Principle 3: Businesses should uphold freedom of association and the effective recognition of the right to collective bargaining

Principle 4: Businesses should uphold the elimination of all forms of forced and compulsory labour

Principle 5: Businesses should uphold the effective abolition of child labour

Principle 6: Businesses should uphold the elimination of discrimination in respect of employment and occupation.

### **Assessment, Policy and Goals:**

At Iron Systems, non-discriminatory policies and procedures with respect to trade union organization, union membership and activity in such areas as applications for employment and decisions on advancement, dismissal or transfer are in place. Put in place non-discriminatory policies and procedures with respect to trade union organization, union membership and activity in such areas as applications for employment and decisions on advancement, dismissal or transfer.

We also trust and imbibe in our policies that labour should be freely given and employees should be free to leave in accordance with established rules. Forced or compulsory labour is any work or service that is exacted from any person under the menace of any penalty, and for which that person has not offered himself or herself voluntarily. Providing wages or other compensation to a worker does not necessarily indicate that the labour is not forced or compulsory. Hence, we take care about these aspects while recruiting, retaining and relieving a worker / employee.

Our The Child Labour Prevention Policy is based upon International Labour Organization (ILO) conventions and United Nations Convention of Rights of Child (UNCRC).

With respect to measures to avoid discrimination in employment and occupation, we have policies and procedures which make qualifications, skill and experience the basis for the recruitment, placement, training and advancement of staff at all levels. In case of discrimination is identified, we have grievance procedures to address complaints, handle appeals and provide recourse for employees.

### **Implementation:**

We respect the right of all workers to form and join a trade union in accordance with national law. We provide workers and workers' representatives with appropriate facilities to assist in the development of effective collective agreement. We do not interfere with the activities of workers / worker representatives while they carry out their functions in ways that are not disruptive to regular company operations. Practices such as allowing the collection of union dues on company premises, have proven to help build good relations between management and workers. We address promptly any problem-solving or other needs of interest to workers and management, including restructuring and

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training, redundancy procedures, safety and health issues, grievance and dispute settlement procedures, disciplinary rules, and family and community welfare. Given the opportunities and environment to the workers and their representatives, the workers did not feel to form any unions in the Iron Systems. As we trust in addressing concerns in prompt way as per amicable and legitimate procedures, no trade or labour union is in existence in our company.

Further, with respect stop forced labour, we have a clear policy not to use, be complicit in, or benefit from any forms of forced labour. We ensure that all concerned company officials have a full understanding of what forced labour is. We provide employment contracts to all employees stating the terms and conditions of service, nature of employment, the freedom to leave (including the appropriate procedures) and any penalties that may be associated with a departure or cessation of work. We do not confiscate workers' identity documents. We prohibit business partners from charging recruitment fees from workers. We provide employment contracts to workers in languages easily understood by workers, indicating the scope of and procedures for leaving the job. We carefully monitor supply chains and subcontracting arrangements.

With respect to the Child Labour prevention and prohibition, we prohibit the work which is likely to harm the health, safety or morals of the child as a consequence of its nature or the circumstances under which it is carried out. We remain adhere to minimum age provisions of national labour laws and regulations and, take account of international standards. We use verifiable mechanisms for age verification in recruitment procedures. We exercise influence on subcontractors, suppliers and other business affiliates to combat child labour.

At Iron Systems, we do not discriminate in employment and occupation i.e. treating people differently or less favorably because of characteristics that are not related to their merit or the inherent requirements of the job based on race, colour, sex, religion, political opinion, national extraction, social origin, age, disability, HIV/AIDS status, trade union membership, and sexual orientation. There is no discrimination in terms and conditions of employment such as – Recruitment, Remuneration, Hours of work and rest/paid holidays, Maternity protection, Security of tenure, Job assignments, Performance assessment and advancement, Training and opportunities, Job prospects, Social security, and Occupational safety and health. We keep up-to-date records on recruitment, training and promotion that provide a transparent view of opportunities for employees and their progression within the company. We provide staff training on non-discrimination policies and practices, including disability awareness. Reasonably adjust the physical environment to ensure health and safety for employees, customers and other visitors with disabilities.

### **Measurement of Outcomes:**

We carefully monitor supply chains and subcontracting arrangements with respect to use of forced labour, child labour, discrimination in employment. Our following policies in Iron Systems Inc. address UNGC Labour related principles and most of their provisions:

#### **a) Anti-discrimination Policy**



Our anti-discrimination policy explains how we prevent discrimination and protect our employees, customers and stakeholders from offensive and harmful behaviors. To ensure that our conduct and processes are fair and lawful, we - Use inclusive language in job ads and include EEO statements; Set formal job-related criteria to hire, promote and reward team members; Offer compensation and benefits according to position, seniority, qualifications and performance, not protected characteristics; Accommodate people with disabilities; Require managers to keep detailed records of their decisions concerning their team members and job candidates.

### **b) Business Ethics Policy**

An employee's actions under this Policy are significant indications of the individual's judgment and competence. Accordingly, those actions constitute an important element in the evaluation of the employee for position assignments and promotion. Correspondingly, insensitivity to or disregard of the principles of this Policy will be grounds for appropriate management disciplinary action.

### **c) Child Labor Prevention Policy**

As an organization, we want to do business in a legal, ethical manner adding value to society and the environment instead of doing harm. Helping stop child labor is fundamental to us. We want to make sure that our organization doesn't take part in children's exploitation and also helps end it to the best of our ability. The International Labour Organization (ILO) and the U.N Convention on the Rights of the Child guide our policy on child labor. To make sure we enforce this policy and help eliminate child labor, we're committed to:

- Working with governments and other organizations to end child labor. We may sponsor or organize actions to educate communities, build schools or find ways to ensure children won't be forced to work to support their families. Educating our staff on youth work laws and show them how to report child labor if they see or suspect it.
- Communicating our no child labor policy to organizations we're connected with and ensure our contracts have the right stipulations.

We want to grow and thrive as a business, but we're also committed to do good by the community we belong in. We ask all of our employees and partners to follow this policy, not just because we demand it as an organization, but because securing a bright future for children is everyone's duty.

### **d) Code of Supplier Conduct**

Iron believes competitive strength is achieved through a diverse group of people working together to find the best solutions and is committed to providing procurement opportunities to women, minorities, veterans, service disabled veterans and small businesses through Iron's Supplier Diversity Program. Iron expects its Suppliers to exercise diversity in their daily business when it comes to their employees as well as in their decisions to select subcontractors. The Code prescribes Labor Standards such as - Nondiscrimination, Respect and dignity, Freely chosen employment, No



child0020labor, Freedom of association, Fair working hours, Wages and benefits, and Safety and health conditions.

#### **e) Corporate Social Responsibility Policy**

Our Corporate Social Responsibility Policy ensures that we don't risk the health and safety of our employees and community and avoid harming the lives of local and indigenous people, and Support diversity and inclusion.

#### **f) Employee Training and Development Policy**

The Employee Training and Development Policy provides employees opportunities to grow, the company has certain provisions regarding individual training programs, all employees that have worked for the company more than four months are eligible to participate in external training programs individually or in teams.

#### **g) Grievance Procedure Company Policy**

Our grievance procedure policy explains how employees can voice their complaints in a constructive way. The company encourages employees to communicate their grievances. That way we can foster a supportive and pleasant workplace for everyone. The company has a formal grievance procedure in place.

#### **h) International recruitment policy**

Our international recruitment policy refers to practices and strategies we employ to hire people all over the world. We explain approaches to international recruitment and when to use each one. There are four approaches to international recruitment: ethnocentric, polycentric geocentric, regiocentric.

#### **i) Occupational or Workplace Health and Safety Policy**

Our Occupational / Workplace Health and Safety Policy help us preserve the best possible work conditions for our employees. Preventative Action and Emergency Management are two key elements of this policy.

#### **j) Separation or Termination of Employment Policy**

Our Termination/Separation of Employment policy refers to the event that an employee ceases to be part of the company's workforce. It is beneficial for all parties that the employment separation process is as clear as possible so misunderstandings and distrust between the employee and the company can be avoided. The company is bound to handle any cases of termination of employment as dictated by law with discretion, professionalism and official documentation.

#### **k) Sexual Harassment Policy**

Our sexual harassment policy aims to protect men and women in our company from unwanted sexual advances and give them guidelines to report incidents. Also, we won't tolerate sexual harassment from inside or outside of the company. Employees, investors, contractors, customers and everyone interacting with our company are covered by the present policy.

### **l) Smoke Free Workplace Policy**

Our employee smoking policy outlines our rules regarding smoking in the workplace. This policy aims to protect non-smokers without unreasonably depriving smokers from their right to smoke.

### **m) Working Hours, PTO and Vacation Policy**

Working Hours, PTO and Vacation Policy includes provisions on - Working hours, Paid time off (PTO), Holidays, Sick leave, Long-term illness, Bereavement leave, Jury duty and voting, Parental leave, and Paternity and maternity leave.

## **ENVIRONMENT PRINCIPLES**

Principle 7: Businesses should support a precautionary approach to environmental challenges

Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility

Principle 9: Businesses should encourage the development and diffusion of environmentally - friendly technologies

### **Assessment, Policy and Goals**

At Iron Systems, we take precaution by systematic application of risk assessment, risk management and risk communication. When there is reasonable suspicion of harm, decision-makers apply precaution and consider the degree of uncertainty that appears from scientific evaluation. We also support precautionary approach by communicating potential risks, if any, for the consumer and providing complete information on risks to the consumer and the public. As a principle, we obtain prior approval before certain products, deemed to be potentially hazardous, if any, are placed to appropriate authorities. We have developed guideline on the consistent application of the approach throughout the company.

We play a vital role in the sustainable development agenda by continuously increasing self-regulation, guided by appropriate codes, charters and initiatives integrated into all elements of business planning and decision-making and fostering openness and dialogue with employees and the public. We owe the responsibility to ensure that activities within our own operations do not cause

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harm to the environment and make efforts to prevent and minimise it, as society expresses a clear need for more environmentally sustainable practices from businesses. Our vision, policies and strategies include and integrate sustainable development aspects — economic prosperity, environmental quality and social equity.

We strive to use environmentally sound technologies, as far as possible to protect the environment, we use all resources in a more sustainable manner, strive to recycle more wastes.

### **Implementation**

We have developed an Occupational / Workplace Health and Safety Policy for practicing in our business operations and products that confirms commitment to care for health and the environment, we are also ISO:9001 Certified. Multi-stakeholders consultations are conducted in a pro-active, early stage and transparent manner, to ensure effective communication of information about uncertainties and potential risks and to deal with related enquiries and complaints whenever arise.

We take steps to promote environmental responsibility, we are in process of developing sustainability targets and indicators (economic, environmental, social) and a sustainable production and consumption programme with clear performance objectives to take the organisation beyond compliance in the long-term. We practice and are constantly working with product designers and suppliers to improve environmental performance and extend responsibility throughout the value chain. As part of adopting voluntary charters, codes of conduct and practice internally as well as with value chains we have adopted UNGC Principles and striving to adopt other such initiatives. Accordingly, we Measure, track and communicate progress on incorporating sustainability principles into business practices, including reporting against global operating standards. In this respect, we assess results and apply strategies for continued improvement. We also ensure transparency and unbiased dialogue with stakeholders.

We have, through our design and research and development team, continuously make improvements in technologies adopted in operations by changing the process and manufacturing technique, changing/altering input materials, and by making changes to the product design and components. Our design and R&D team focuses on the concept of 'Design for Sustainability'.

### **Measurement of Outcomes**

To measure the outcomes of the commitments, appropriate management systems are crucial. We intend to use communication and reporting tools such as sustainability reporting to further our commitment. We make information available to stakeholders that illustrate the environmental performance and benefits of using such technologies. We examine investment criteria and the sourcing policy for suppliers and contractors to ensure that tenders stipulate minimum environmental criteria. Our following policies address the relevant environment related provisions of the United Nations Global Compact:

**a) Code of Supplier Conduct**

Iron's reputation for service, quality and fair dealing is coupled with Iron's firm commitment to the values of integrity, social responsibility and responsible environmental stewardship. Iron believes that we are all responsible for conducting our businesses in a socially and environmentally responsible manner. We base this on the premise that a company is much more than the products and services it sells; the effect a company has on the environment, the people and the communities it serves reflects the company's dedication to being not only a good business, but being a good corporate citizen. Iron's approach to social and environmental responsibility includes establishing standards of excellence for Suppliers, who are vital and necessary partners.

Iron is committed to being a corporate leader in environmental responsibility. Iron is a recognized industry leader through its commitment to reduce greenhouse gas emissions, deployment of renewable energy and our aggressive cell-phone recycling efforts. These efforts are bolstered by environmentally responsible building practices, "green" IT, waste-reduction efforts, e-billing practices, environmentally beneficial products and services, and a strong environmental employee- engagement program. Iron Suppliers are expected to adhere to the following principles:

- Reduce or eliminate water, energy or raw material waste at the source
- Ensure hazardous substances are managed and disposed of safely
- Control, reduce or eliminate all air emissions of volatile organic chemicals, aerosols, corrosives, particulates and combustion by-products generated from operations

Iron expects its Suppliers to operate in a manner which protects the environment. Suppliers must ensure that they comply with all applicable environmental laws, regulations and standards including laws related to air emissions, water discharges, hazardous waste disposal, environmental permitting and reporting, and product labeling and warning requirements.

**b) Corporate Social Responsibility Policy**

Our Corporate Social Responsibility Policy is committed towards protecting the environment. Our company's existence is not lonely. It's part of a bigger system of people, values, other organizations and nature. According to the policy, our company recognizes the need to protect the natural environment. Keeping our environment clean and unpolluted is a benefit to all. We'll always follow best practices when disposing garbage and using chemical substances. Stewardship will also play an important role. The CSR Policy also emphasizes that apart from legal obligations, our company will proactively protect the environment by - Recycling Conserving energy; Organizing reforestation excursions; and Using environmentally-friendly technologies, among others.

**ANTI CORRUPTION PRINCIPLES**

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery

## **Assessment, Policy and Goals**

Elimination of all forms of corruption is a priority within the Iron Systems Inc. Confidence and trust earned by Iron Systems among its investors, customers, employees and the public by having business ethics principles and practice.

## **Implementation**

As the United Nations Global Compact suggests, we already practice following three elements when fighting corruption and implementing the 10<sup>th</sup> principle of UNGC. As a first and basic step, we introduced anti-corruption policies within our company and business operations including in our value chains.

## **Measurable Outcomes**

Our following policies address the 10<sup>th</sup> principle against corruption:

### **a) Business Ethics Policy**

The Business Ethics Policy is in practice for internal business operations. It provides. The purpose of this Policy is to affirm, in a comprehensive statement, required standards of conduct and practices with respect to certain type of payments and political contributions. The Company expects all employees to use only legitimate practices in commercial operations and in promoting the Company position on issues before governmental authorities. As stated below, "kickbacks" or "bribes" intended to induce or reward favorable buying decisions and governmental actions are unacceptable and prohibited.

### **b) Code of Supplier Conduct**

The Code of Supplier Conduct is in existence and practiced, the goal of this Code of Supplier Conduct is to provide the framework for an ethical and sustainable supply chain focused on meeting legal requirements and conducting business with the highest standard. It is founded on the following principles: acting with integrity; being fair and respectful; keeping your word; protecting Iron's reputation; and being intolerant of unethical behavior.

Compliance to Applicable Laws and Regulations - Foreign Corrupt Practices Act/Organization for Economic Cooperation and Development – It is prohibited to give or offer money or anything else of value to a foreign official for the purpose of influencing the foreign official to assist Iron or Supplier in obtaining or retaining business or securing any improper advantage. We also have a dedicated Ethics Helpline Number to promptly address issues from our stakeholders.

### **c) Corporate Social Responsibility Policy**



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We want to be a responsible business that meets the highest standards of ethics and professionalism. We'll promote: Safety and fair dealing Respect toward the consumer; and Anti-bribery and anti-corruption practices. Under the Corporate Social Responsibility (CSR) Policy, we have committed that We'll always conduct business with integrity and respect to human rights. We'll promote: Safety and fair dealing Respect toward the consumer; Anti-bribery and anti-corruption practices.

**d) Record retention policy**

Our Record Retention policy describes our guidelines to create, preserve and access our company's records. To ensure that our records are accurate and secure, we ask our employees to adhere to this policy.





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