

# Communication on Progress

1.7.2022

3stepIT

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## 1. CEO STATEMENT

To our stakeholders:

I am pleased to confirm that 3stepIT supports the Ten Principles of the United Nations Global Compact on human rights, labour, environment and anti-corruption.

With this communication, we express our intent to implement those principles. We are committed to making the UN Global Compact and its principles part of the strategy, culture and day-to-day operations of our company, and to engage in collaborative projects which advance the broader development goals of the United Nations, particularly the Sustainable Development Goals. We will make a clear statement of this commitment to our stakeholders and the general public.

We recognize that a key requirement for participation in the UN Global Compact is the annual submission of a Communication on Progress (COP) that describes our company's efforts to implement the Ten Principles. We support public accountability and transparency, and therefore commit to report on progress annually according to the UN Global Compact COP policy. This includes:

- A statement signed by the chief executive expressing continued support for the UN Global Compact and renewing our ongoing commitment to the initiative and its principles. This is separate from our initial letter of commitment to join the UN Global Compact.
- A description of practical actions (i.e., disclosure of any relevant policies, procedures, activities) that the company has taken (or plans to undertake) to implement the UN Global Compact principles in each of the four issue areas (human rights, labour, environment, anti-corruption).
- A measurement of outcomes (actual results vs targets) to be published in our annual Sustainability Report.

Sincerely yours,

Carmen Ene

CEO

1.7.2022

## 2. HUMAN RIGHTS

### Assessment, policy and goals

*Description of the relevance of human rights for the company (i.e. human rights risk-assessment). Description of policies, public commitments and company goals on Human Rights.*

We acknowledge our support for the Universal Declaration of Human Rights. Our policies in this respect are fully outlined in the company's Code of Conduct. This is a formal policy which all employees are introduced to during their onboarding process, and reminded of annually via an online course.

We have in place a Supplier Code of Conduct with a focus on human rights to assess all suppliers' ethical standards. We are in the process of rolling this out to existing suppliers when their contracts are up for renewal, as well as to new suppliers. Additional information is available in our annual Sustainability Report.

### Implementation

*Description of concrete actions to implement Human Rights policies, address Human Rights risks and respond to Human Rights violations.*

We operate annual training for all employees to reinforce our Code of Conduct. We also have an independent whistleblowing mechanism that can be used to submit grievances.

As part of our Speak Up campaign we ask our people across our operations to:

Inform us promptly if you see non-compliance with laws, regulations or other unethical behaviour. Whether you are an employee or line manager, you must report known or suspected misconduct relating to following topics:

- a) non-compliance with our Code of Conduct and policies;
- b) breaches of law or regulation;
- c) all forms of financial malpractice or impropriety; or
- d) unethical behavior or improper conduct

## Measurement of outcomes

.All measures are reported in our annual Sustainability Report, available here:

[https://content.3stepit.com/hubfs/3StepIT%20Theme/Annual%20Reports/3stepIT\\_AR2021\\_FINAL\\_200522.pdf](https://content.3stepit.com/hubfs/3StepIT%20Theme/Annual%20Reports/3stepIT_AR2021_FINAL_200522.pdf)

### 3. LABOUR

#### Assessment, policy and goals

*Description of the relevance of labour rights for the company (i.e. labour rights-related risks and opportunities). Description of written policies, public commitments and company goals on labour rights.*

We subscribe to the Principles outlined above and have prepared detailed company policies dealing with these topics. Our HR policy is introduced as follows:

3 Step IT aims at being a great place to work for its employees. One corner stone of great place to work is trust which consists of credibility, respect and fairness. The purpose of the 3 Step IT HR policy is to give common guidelines in HR issues in order to ensure fair and respectful treatment of our employees. 3 Step IT Group and its group companies follow always local laws and regulations. In addition, there are global and local HR policies and guidelines, which all employees are obligated to follow.

Each Country Manager, together with HR, is obliged to harmonize local policies and instructions in accordance with 3 Step IT Group HR policies and guidelines taking into account local legislation. Country Manager is responsible for ensuring that all Group and country level HR policies, guidelines and instructions, in addition to local laws and regulations, are followed in the respective country. Country Manager takes also care of that common HR processes are used in local level.

Following HR related policies are defined on Group level:

- Traveling Policy
- Compensation Policy
- Talent Acquisition Policy
- Training Policy
- Car Policy
- Expenses Policy
- Remote work policy
- Disciplinary actions policy

## Implementation

*Description of concrete actions taken by the company to implement labour policies, address labour risks and respond to labour violations.*

As noted previously, an independent 'Speak Up' policy empowers our people to air any grievances in a confidential, safe environment.

A detailed HR policy sets out our framework for H&S, prevention of workplace discrimination and fairness in the workplace practices and policies.

## Measurement of outcomes

All measures are reported in our annual sustainability report.

Full and independent audit is performed annually ensuring compliance across each functional area with local law and regulation.

## 4. ENVIRONMENT

### Assessment, policy and goals

*Description of the relevance of environmental protection for the company (i.e. environmental risks and opportunities). Description of policies, public commitments and company goals on environmental protection.*

3 Step IT is in business to provide customers with efficient and sustainable technology lifecycle management services. We base our business on the principles of the circular economy, and strive to operate ever more sustainably. Our IT lifecycle management products and services ensure that returned IT-equipment is reused, or if that is not possible, responsibly recycled. We aim to assure and continually improve customer satisfaction by developing our products and services based on customer feedback, as well as stakeholder needs and expectations generally.

Company-wide processes and procedures for quality and sustainability commit us to continual improvement by setting targets, educating employees, measuring our performance and communicating it to our stakeholders in an open, honest and timely manner. We cooperate closely with our customers and stakeholders, and we participate in sustainability forums and other initiatives to share, develop and implement industry specific best practices. Our certified management system is based on implementation of ISO 9001, ISO

14001:2015 and ISO 27001. We are committed to comply with local laws and regulations wherever we operate. Our environmental management system ensures we pay active attention to the use of raw materials, consumption of energy, prevention of pollution and climate change mitigation.

### Implementation

*Description of concrete actions to implement environmental policies, address environmental risks and respond to environmental incidents.*

See above description.

### Measurement of outcomes

See annual sustainability report



## 5. ANTI-CORRUPTION

### Assessment, policy and goals

*Description of the relevance of anti-corruption for the company (i.e. anti-corruption risk-assessment). Description of policies, public commitments and company goals on anti-corruption.*

3step IT is committed to work against bribery and corruption in all its forms. This includes both public and commercial bribery. Corruption is the abuse of entrusted power for inappropriate advantage. It can take many forms that can vary in degree from the minor use of influence to institutionalized bribery. Bribery is one type of corruption. It may take the form of an offer or receipt of any kind, loan, fee, reward or other in-kind advantage to or from any person as an inducement to do something that is dishonest, illegal or a breach of trust in the conduct of the company's business.

3stepIT's tolerance towards all forms of bribery and corruption is zero. This means that 3stepIT or its employees must not accept, make, seek or offer bribes or monetary advantages of any kind. This includes money, facilitation payments, benefits, entertainment or services or any material benefit to or from public officials or other business partners, that are given with the intent of gaining personal advantage or improper business.

### Implementation

*Description of concrete actions to implement anti-corruption policies, address anti-corruption risks and respond to incidents.*

Independent whistleblowing system and procedures in place.

Annual compulsory training to all staff reinforcing anti bribery / anti-corruption / conflict of interest policy

### Measurement of outcomes

See annual report for all measures