

THE TRANSPARENCY ACT

REPORT 2023

3 STEP IT AS

1. INTRODUCTION

This report has been prepared in accordance with the Norwegian Transparency Act of 18 June 2021 (the “Transparency Act”). The report provides information on the implementation and work with the Act in 3stepIT AS (“3stepIT”) with respect to safeguarding human rights and decent working conditions in the company.

2. THE COMPANY – 3 STEP IT

2.1 General

3stepIT is a Norwegian limited liability company with parent company in Finland. The Finnish parent company is 3 Step IT Group Oy.

3stepIT’s main shareholder is 2holding N&B Oy. 3stepIT has approximately 45 employees, all located in Oslo, Norway.

2.2 Product and production

3stepIT helps businesses consume IT more sustainably, by providing customers a better way to acquire, manage and refresh their technology. 3stepIT serves more than 4,000 businesses worldwide and manages over 2 million assets, extending the lifespan of equipment, improving its resale value and finding it a new home when it is no longer needed by a business. 3stepIT complies with all applicable employment legislation wherever it operates.

3. THE TRANSPARENCY ACT

The purpose of the Transparency Act is to increase knowledge and awareness among businesses regarding decent working conditions and fundamental human rights in connection with the production of goods and the delivery of services throughout the supply chain. Compliance with the law is based on a principle of proportionality and risk assessment. As part of fulfilling the purpose of the Act, the public must be given access to information about what businesses do to ensure decent working conditions and basic human rights in the business itself and the business’s supply chain. Information must also be provided on how businesses manage any negative consequences for decent working conditions and basic human rights.

3stepIT falls within the scope on the Act. As the Act is a Norwegian legal requirement, it is required that the Norwegian legal entity has a process and publish its own report based on the risk assessment for the supply chain to the Norwegian legal entity.

3.1 REQUESTS FOR INFORMATION

Information about the Transparency Act has been posted on 3stepit.com. General information has been posted on how the company complies with the Act, and how the company can be contacted for questions about the Act.

3stepIT has included contact information on its webpages to ensure that any information requests are received and handled in accordance with the Transparency Act. Per the date of this report, 3stepIT has not received any requests for information.

4. THE COMPANY'S WORK WITH THE ACT

4.1 Responsibilities

The Board of Directors in 3stepIT (the "Board") has the overall and oversight responsibility of the management of the company, including oversight of risks related to adverse impact on human rights and decent working conditions.

The Board has nominated a role within 3stepIT as the operative Transparency Act Responsible, which includes an internal instruction for the role. The role as Transparency Act Responsible includes a primary responsibility for replying to requests for information pursuant to the Transparency Act, and for initiating and preparing risk assessments in accordance with the Transparency Act. If any need for mitigation is found, the Transparency Act Responsible shall inform the Board, who will be responsible for assessing the mitigation measures.

4.2 Policies and procedures

3stepIT group has globally developed and implemented procedures and policies directly related to the Transparency Act which are also applicable for 3stepIT AS and its personnel as such.

The policies and procedures relevant to the Act include:

- Code of Conduct
- Modern Slavery Statement
- Quality and Environmental Policy
- Information Security Policy
- Anti-bribery and corruption policy
- Supplier & Business Partner Code of Conduct

3stepIT continuously reviews its policies and processes. The routines are drawn up at group level and apply to everyone in 3stepIT. All employees must follow these principles in all their working and business relationships whether with other colleagues, customers or business partners.

3stepIT is committed to the following global initiatives:

- The Universal Declaration of Human Rights
- The International Labour Organization's Core Conventions on Labour Standards
- UN Global Compact

4.2.1 Code of Conduct

The Code of Conduct outlines the ethical behavior standards and values that all employees should adhere to, regardless of the role, or where located. 3stepIT's Code of Conduct has been approved by 3stepIT Group' Board of Directors.

3stepIT respect international human rights and fair labour practices wherever we operate. The company are free from discrimination and harassment, whether based on sex, gender identity, nationality, religion, belief system, race, age, disability, sexual orientation, political opinion, union membership or social or ethnic origin or any other factor.

4.2.2 Anti bribery

3step IT is committed to work against bribery and corruption in all its forms. This includes both public and commercial bribery. 3stepIT's tolerance towards all forms of bribery and corruption is zero. The routine describes conflicts of interest, such as how employees should handle gifts and sponsorships. All allegations of bribery and corruption (anonymous or otherwise) will be investigated thoroughly.

4.2.3 Supplier & Business Partner Code Of conduct

The Code of Conduct applies to all business partners including trading partners, sub-contractors, and suppliers ("The Supplier") that deliver goods or services to any of 3stepIT's business units or subsidiaries and their employees or other representatives or purchases refurbished equipment from 3stepIT.

The Supplier is expected to use the Code of Conduct as a standard for business practices throughout their own organisation and ensure that their own suppliers and business partners act in accordance with its principles.

In addition to compliance with the Code of Conduct, The Supplier is expected to comply with all relevant applicable laws, directives, and standards in all countries in which they operate.

The Supplier is required to notify 3stepIT, without delay, if it notices violations in its own activities or in those of the subcontracting chain with respect to the Code of Conduct. The supplier must immediately report to the supplier's main contact in 3stepIT or via the 3stepIT Speak-up line.

4.3 Mapping

4.3.1 Internal compliance

3stepIT has mapped its own operations by reviewing agreements, routines, policies and systems, such as employment contracts, ethical guidelines and timesheets for working hours, etc. Furthermore, investigations have been conducted to see whether this is practiced and followed.

The review shows that 3stepIT complies with the provisions of the Working Environment Act and other relevant regulations in an employment relationship. Nor have any forms of human rights violations been uncovered in the company.

4.3.2 Supplier compliance

3stepIT undertakes appropriate due diligence measures when evaluating agreements with new suppliers, and regularly reviews its existing service providers, cf. section 4.2.3 of the Supplier & Business Partner Code Of conduct.

The obligations that follow from the Act are to a certain extent covered by the internal measures taken in 3stepIT. In addition, 3stepIT has conducted its own investigations of its suppliers in Norway.

3stepIT has initiated a risk-based mapping of suppliers in the Norwegian unit that provided an estimated annual delivery of more than NOK 50 000. In addition to a general assessment of these suppliers, a questionnaire has been drawn up and will be sent out to the suppliers. The suppliers will be asked to reply to various questions relating to health and safety issues, labour rights, human rights and other relevant areas.

3stepIT will not currently conduct investigations regarding the suppliers' suppliers.

5. RISK ASSESSMENT

As referred to in section 4.2, 3stepIT globally has several comprehensive routines that apply globally to the company. The procedures and routines also apply to the 3stepIT AS.

3stepIT considers it highly unlikely that there is any risk in its own operations that could lead to negative impact or harm, or contribute to negative influence or harm, in areas that the Transparency Act is intended to protect. We believe the Code and policies, in conjunction with the principles, will raise awareness of decent working conditions and encourage greater reporting and cooperation.

In accordance with the requirements set out in the Transparency Act, 3stepIT is in the process of a closer assessment of the Norwegian unit and suppliers. The preliminary assessment based on the ongoing contact with the suppliers it is unlikely that the assessment will result in findings that are not in accordance with the law. The suppliers give the impression that they have good routines that they comply with in practice.

The preliminary work with the Act shows that the general risk of breach of basic human rights in relation to 3stepITs' is considered low. The same applies to basic working conditions.

The company will continue its work related to suppliers to identify and assess risks of adverse impacts on human rights and decent working conditions and to take measures to stop, prevent or reduce such risks. The company will publish a report in the spring of 2024 which has a more detailed and descriptive assessment of the suppliers to the 3stepIT AS.

Helsinki 22.12.2023

The board of 3stepIT AS

Jarkko Veijalainen

Jari Lemmilä

Jakob Lagander