

Code of Conduct

2020

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Opening words



One of my most important roles as CEO is as guardian of our culture. This culture is unique to us, vibrant, and grounded in the principles of fairness, transparency and good will. It is who we are, how we conduct ourselves and what unites us all as 3Steppers.

This documents attempts to capture and codify that.

Of course it is important that we use this opportunity to state our commitment to abide by all local and international laws and regulations. But that is just the beginning.

Our values - positive, passionate, responsible, curious and amazing - are strong and ever-present in our daily work.

We hold ourselves to the highest ethical standards, always aspiring to go above and beyond in our dealings with each other, with our customers and with our business partners.

As an employer, we seek to offer meaningful work and fulfilling careers to employees who are fairly rewarded, and have good work-life balance.

As a customer, supplier or partner we seek to develop enduring commercial relationships supported built on personal connection.

Through our work, we not only help our customers to be more sustainable, but we also commit to constantly improving our own green credentials, and minimizing our impact on the environment.

The values and ethics set out below guide my own daily work, and I expect that to be true of all my colleagues, regardless of rank or role. It acts as guide for our business partners too, as we want those who work alongside us to adhere to these common principles as well. Upholding the values and acting accordingly is everyone's responsibility and together we can create positive impact.

Yours,

Carmen Ene
Chief Executive Officer

Who we are

Our work is guided by a single purpose – to take care of the world's technology. We exist to help businesses consume IT more sustainably, by providing our customers with a better way to acquire, manage and refresh their technology.

Today we serve more than 4,000 businesses worldwide and manage over 2 million assets, extending the lifespan of equipment, improving its resale value and finding it a new home when it's no longer needed by a business.

From our headquarters in Finland and across the all the countries where we operate, we are committed to carrying out this work to the highest possible ethical standards and in line with our common vision, mission and values.



Our Code of Conduct

Our Code of Conduct outlines the ethical behaviour standards and values that all of us should adhere to, regardless of the role, or where located.

We are all responsible for our own actions and for implementing the Code of Conduct in our daily work. Our leaders are responsible to ensure that the Code of Conduct is known and respected throughout our business.

We make our Code of Conduct publicly available, because we also expect that our business partners respect these common principles too.

Our Code of Conduct has been approved by 3stepIT Group' Board of Directors. As this is a living and breathing document – we commit to reviewing it each year and updating it to ensure it continues to reflect our company as it grows.

This document is not a detailed policy that provides answers to every question, but should act as a general guide on how to bring our values and ethical principles to life and as a summary by saying:

We...

- comply with **laws and regulations**
- follow **ethical business practices**
- create **positive impact**
- respect each other**
- speak up**



We comply with laws and regulations

We comply with all applicable laws and regulations everywhere we operate.

This means that we will also comply with international anti-bribery standards as stated in the United Nations Global Compact as well as local laws of anti-corruption, anti-bribery and anti-money laundering.

We support the principles of the UN Universal Declaration of Human Rights as well as the 1998 International Labour Organization Declaration on Fundamental Principles and Rights at Work and the Rio Declaration on Environment and Development.

We share the ambitions of the UN Global Compact and its Sustainable Development Goals (SDGs), adopted with the ambition to eradicate poverty, protect the planet and guarantee prosperity for all, by 2030.

All employees must follow these principles in all their working and business relationships whether with other colleagues, customers or business partners.

In situations where the laws and regulations do not give guidance, we apply ethical standards based on our values and this Code of Conduct.



We follow ethical business practices

Business Integrity

We uphold the highest standards of integrity in all our business interactions. We are committed to provide highest quality of services and products. In addition, we want to ensure that our employees have the professional skills they need.

We sell our services and products on their merits, and we never make false or misleading statements about 3stepIT, our offerings or our competitors.

We carry out business only with known and reliable customers, trading partners, suppliers and other business partners who are committed to follow similar ethical practices than we do.

Fair competition and confidentiality

We compete energetically and fiercely for the right business, but in an ethical and always lawful manner. This is irrespective how competitive the situation we are or in the market in which we operate.

When working with another organisation, we never share commercially sensitive information, unless formally agreed. When in contact with a competitor we never share commercially sensitive or confidential information in unlawful way and always report to line manager if inappropriate information is received from some other party.

Conflicts of interest

We commit to avoiding any conflict between our own personal interests and the interests of 3stepIT in any business operations. This includes, but is not limited to, giving or receiving of personal gifts or hospitality, other than what is reasonable in the ordinary course of business and as acceptable under the law.

Security and privacy

We are committed to have appropriate information security measures in place throughout all our operations and services.

We protect all reasonable privacy expectations when processing the personal data of our employees and everyone we do business with and comply with privacy regulations when personal information is collected, stored, processed, transmitted and shared.

We prize our security and privacy-orientated culture, by providing training on security and privacy protection for all our employees in relation to specific roles to raise awareness of personal data protection.



We respect each other

Human rights and fair labour practices

We respect international human rights and fair labour practices wherever we operate. This means that we:

- Will not accept, engage or support the use of child labour, forced labour or human trafficking.
- Will comply at a minimum with all applicable wage and hour laws and
- Will respect the legal rights of its employees to form, organise, join (or not) worker organizations, including trade unions.

Encouraging and safe working environment

Our employment practices link pay and performance, and encourage continuous development. We offer our employees opportunities for training and educational activities according to the requirements of their current and future work tasks.

We want to be a healthy, safe and productive work place. This goes beyond a physical space that complies with health and safety regulations. We do not tolerate any kind of harassment or bullying in the workplace.

Diversity and equal opportunities

We 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.

We respect and appreciate difference and we hire new employees solely based on their expertise and potential.

We are proud to promote a culture of diversity and equal opportunities whether related to our current roles, promotion, compensation, or other benefits.

We create positive impact

Our purpose is to take care of the world's technology.

We exist to help our customers consume technology more sustainably, but our green mission does not end there.

We know our customers only want to work with the most responsible business partners, and like them, we want to minimise our environmental impact, conserve resources and run the most sustainable operations we can.

We comply with all applicable environmental regulations and standards. We also expect suppliers and partners will also obey these regulations.

We act promptly and openly to correct incidents or conditions that could harm the environment, or affect negativity to our communities.



We speak up

We all have the right and responsibility to speak up. If we see unethical or illegal behaviour or an individual acts against the terms of our Code of Conduct, we commit to reporting our concerns as soon as possible.

We provide a safe, secure and confidential way to express concerns and questions.

The first point of contact is your line manager. However, your local HR representatives and our Ethics and Compliance Officer are also available when needed.

Moreover, reporting can be done confidentially via our Speak up - line provided by the external service provider, WhistleB, and managed by Group Ethics and Compliance function. The Speak up- line allows employees to report issues via online form or by phone, with the option of doing so anonymously.

We will act promptly to review and investigate all concerns and handle them in a respectful and confidential way.

When we make decisions,
we always keep in mind:

Does it feel right now and in the future?

Will others think it is right?

Are we acting in according to our values, Code of Conduct and policies?

Is it legal?



Sustainable technology

We take care of the world's technology, to take care of the world. We help our customers manage technology in a sustainable, efficient and cost-effective manner.

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