



**ITIVITI**

# **Corporate Social Responsibility Policy**

Itiviti Group AB



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## Introduction

This Corporate Social Responsibility policy (CSR) is intended to provide guidance on how the corporate social responsibility work shall be conducted within Itiviti Group (Itiviti).

Itiviti is committed to conducting its business responsibly at all times, which means respecting the safety and health of its employees, protecting the environment, respecting human rights of its employees and others in the communities Itiviti operates in.

In order to meet the requirements of CSR from all Itiviti's target groups including customers, employees, partners and other stakeholders and to fulfill the obligation to provide corporate social responsibility, a shared set of values and rules have been developed.

Itiviti's employees shall be aware of the company's basic beliefs and follow our CSR. Through the efforts of each of our employees, Itiviti is determined to take pride in being responsible, respected and welcomed.

Itiviti's CSR policy is approved by the Board of Directors.

Itiviti's CSR includes but is not limited to the following:

- Sound corporate activities
- Respecting human rights
- Complying with local and international laws, rules and regulations
- Maintaining a good working environment
- Contributing to sustainable development



## Sound Corporate Activities

Itiviti endeavors to comply with international regulations, related laws, and internal rules, exercise sound and fair corporate practices, earn the trust of stakeholders such as customers, employees, business partners, and society.

Itiviti will maintain constructive relationships with administrative bodies, remaining politically neutral and complying with laws, and will not engage in relationships with individuals or groups that threaten social order or safety.

## Corporate Framework

### Articles of Association

Itiviti shall have its registered head office in Stockholm, Sweden. The main business objectives of the company shall be to develop systems for financial and economic markets and related activities. Itiviti has appropriate corporate procedures and adhere to all applicable laws. Please view our Articles of Association for further information.

### Board of Directors

Itiviti has established appropriate procedures for the work of the Board of Directors and for its control of the administration of Itiviti's business. The procedures are reviewed and approved annually at the first meeting of the Board. The Board shall hold its first meeting immediately after the Annual Shareholders' Meeting and the Board shall meet at least once a year. Please view Operating procedures for the Board of Directors for more information.

### Auditor

Itiviti complies with all applicable auditing laws and has an auditor in all countries where it is required. During board meetings, the company's auditor should be present when needed for evaluation of the financial position of Itiviti and, in all events, at least one time per year. The Director's report shall clearly indicate how Itiviti's organization is formed so that the accounting, the cash management and the Itiviti's financial situation can be satisfactory controlled. Further details are set forth in the Operating procedures for the Board of Directors.

### Travel, Representation and Payment Cards

At Itiviti, our business trips must be well motivated from a business perspective and thoroughly planned. The mode of transportation and travel standard should be chosen with consideration to price and in line with the Itiviti's Environmental Policy. Itiviti has specific procedures for travel expense reports and entertainment, internally and externally, will only be reimbursed if reasonable. Price consciousness shall be applied in all aspects in regard to trips and representation. Company issued credit cards or corporate credit cards shall be seen as working tools and are only issued to employees after need. All expenses must be motivated with proof of very specific needs. Please view our Travel Manual and Credit Card Manual for further information.

### Agreements

Itiviti has well established procedures for its sales operations. Organizational safeguards ensure efficiency, a standardized business model, minimized risk, allocation of responsibility and a correct and



streamlined invoicing process. Please view our Sales Operations Process Manual for further information. Further, the Procurement and Contract Signing Manual is aimed to streamline the process of procurement and contract signing within Itiviti. Itiviti's Delegation of Authority Manual effectively manages and safeguards the financial resources of Itiviti and its subsidiaries. Itiviti has clearly defined limits on authority designated to specified positions of responsibility, and the established maximum amount of commitment and risk the individual is authorized to undertake on behalf of Itiviti. Please view our Delegation of Authority Manual for further information.

## Human Rights

Itiviti respects the United Nations Universal Declaration of Human Rights and recognizes our responsibility to observe those rights that apply to our performance toward our employees and the communities we work and live in. Itiviti takes responsibility for all people participating in the conduct of its business. Itiviti employees are not deprived of their human rights, or subject to mental or bodily harm in their labor. Itiviti understands that its business may have an impact on human rights issues, in particular in relation to people's working and living conditions.

Itiviti respects fundamental freedoms and rights. Itiviti acts within the scope of local and international laws, rules and regulations. Itiviti values and respects different cultural backgrounds and traditions and tolerate no discrimination based on age, race, sex, religion, sexual orientation, marital status, social origin, political beliefs, ethnic background or disability.

Itiviti is totally opposed to all forms of corruption, including extortion and bribery as well as all forms of forced labor and child labor. Itiviti does not, directly or indirectly, use forced labor or other forms of involuntary labor, including prisoners, bonded workers, illegal workers, or other non-paid workers.

Itiviti recognizes and honors the rights of every child to be protected from economic exploitation and from performing any work that is likely to be hazardous, to interfere with the child's education, or to be harmful to the child's health or physical, spiritual, moral, or social development. Itiviti complies with applicable law and international standards regarding child labor.

## Employment Law/Work

Itiviti strives to provide a safe and healthy working environment for all employees. Work environmental aspects are considered in all relevant decisions relating to the business. Itiviti shall comply with applicable labor laws in all countries. Please see Itiviti's Work Environment Policy for further information.

## Environment

Itiviti's environmental work is based on promoting a sustainable society and contributing to sustainable profitability. Environmental work is an integral part of Itiviti's business activities in which laws, rules and regulations are followed. Itiviti shall continuously improve and monitor environmental performance. In order to achieve this we shall work to optimize the use of energy in the business and reduce the relative amount of waste etc. Environmental work is based on Itiviti's Environmental Policy.



## **Applicability**

This policy applies to all employees of Itiviti Group AB and its subsidiaries. In cases where national regulations cause difficulties regarding the implementation of or differs from the content of this policy, national regulations shall rule in those areas. Other parts of this policy shall still be valid.

## **Owner**

Chief Compliance Officer.