



ITIVITI

Corporate Social Responsibility Policy

Itiviti Group AB



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Introduction

People and organizations are socially responsible when they behave ethically and with sensitivity toward social, cultural, economic and environmental issues. Itiviti strives to act as a socially responsible organization. Corporate social responsibility (“CSR”) helps organizations have a positive impact on society.

This policy is not about affirming to the world that Itiviti is a socially responsible organisation in order to bolster its image. This policy is about Itiviti’s awareness of the ecosystem in which it conducts its activities and its commitment to taking concrete steps to contribute positively to society on the economic, social and environmental levels.

With CSR, companies integrate social and environmental concerns in their business operations and in their interaction with their stakeholders, on a voluntary basis. CSR leads companies to be aware and to take responsibility for the impact of business decisions and activities on society and the environment, in particular through transparent and ethical behaviour.

This CSR Policy is intended to provide guidance on how the corporate social responsibility work shall be conducted within the 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 the 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 employees are made aware of Itiviti’s core values and rules and of its commitment to CSR. Through the efforts of each of our employees, Itiviti is determined to take pride in being responsible, respected and welcomed on a voluntary basis. For further guidance, Itiviti employees are invited to consult Itiviti’s CSR Manual.

This policy is approved by Itiviti’s Board of Directors.



Governance

Itiviti's governance is a framework of organizational controls along with policies and procedures ensuring that corporate practices are based on ethics, business transparency and diversity.

Itiviti and its employees are committed to conduct business in a socially responsible manner and reject any illegal or fraudulent practice contrary to the rules of good governance, Itiviti's policies and related documents, including its Codes of Ethics and Conduct.

Corporate Framework

Articles of Association

Itiviti's registered head office is in Stockholm, Sweden. The main business objective of the company is to develop and provide technology solutions for financial institutions. Itiviti has appropriate corporate procedures and adheres to all applicable laws.

Board of Directors

Itiviti has established appropriate procedures and controls to enable oversight by the Board of Directors. The Operating procedures for the Board of Directors regulates the Board of Directors. Reports on procedures and controls are reviewed and approved annually at the first meeting of the Board. The Board hold its first meeting immediately after the Annual Shareholders' Meeting and the Board shall meet at least once a year.

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 is present when needed for evaluation of the financial position of Itiviti.

Sales and procurement processes and commercial agreements

Itiviti has well established procedures for its sales operations. These are captured in the Sales Operations Process Manual. Organizational safeguards ensure efficiency, a standardized business model, minimized risk, balanced allocation of responsibility and a correct and streamlined invoicing process.

All Itiviti agreements contain references to compliance with regulations and policies, as we want to make sure that all our interlocutors respect the rules to which we abide.

Our suppliers are required to conform with all applicable laws and/or regulatory requirements and Itiviti policies, including any anti-slavery and human trafficking, anti-bribery and anti-money laundering laws, insider trading, personal data and privacy protection laws, international sanctions and the UN Guiding Principles, including Itiviti policies. Itiviti requires that its suppliers take active steps to prevent any violations of such regulations and policies.



Internally, the Procurement Contractual Process Manual is aimed at streamlining the process of procurement and supplier contract signing.

Itiviti's Delegation of Authority Manual effectively manages and safeguards the financial resources of Itiviti and its subsidiaries. The Board of Directors grants signatory rights within certain limits to the CEO of the company with the right to delegate his/her authority within the scope of his authority. Employees with delegated authority are listed and authority is granted with clearly defined limits and conditions for exercising the authority on behalf of Itiviti.

CSR Committee

Itiviti has established a strategy to manage Itiviti's CSR approach, goals and practices, which includes developing policies, implementing action plans and monitoring how Itiviti performs against relevant key performance indicators. The Chief Compliance Officer oversees reporting on CSR and progress made during the year, mapping out CSR strategies and measuring key performance indicators.

The Chief Compliance Officer publishes a CSR report annually.

To make sure that measures are implemented in order to execute this CSR Policy, Itiviti has also established a CSR Manual and Action Plan. The Chief Compliance Officer shall be in charge of the implementation and development of such Manual. [Please view our CSR Manual for further information.](#)

Compliance with International Commitments

On the CSR front, Itiviti has decided to follow ISO 26000:2010.

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 adheres to the UN Global Compact and its 10 principles directly commit us to the respect, defense and protection of Human Rights. This voluntary observance entails our compliance with the commitments assumed.

Itiviti complies with current national and international laws and regulations in all countries that Itiviti operates in, adopting complementary international rules and guidelines such as those established by the OECD and International Labour Organization (ILO) agreements.

Reporting and Transparency

Itiviti promotes an open communication environment where employees can express their concerns and problems, report violations or ask questions in a confidential manner and without fear of reprisal.



Employees should raise these issues through their standard reporting channel, which consists of the employee's direct manager, another manager whom the employee trusts, the Human Resources department, or the Chief Compliance Officer.

In order to allow employees to raise concerns about serious wrongdoing, Itiviti has established a whistleblowing system that enables anonymous reporting. [Please view our Whistleblowing Policy for further information.](#)

Environment

Itiviti works on promoting a sustainable society and contributing to sustainable profitability. Itiviti strives to raise awareness about the environment and defines actions to continuously improve and monitor its performance in protecting the environment. In order to achieve this, Itiviti works to optimize energy usage and to reduce waste or ensure proper recycling/management tools are put in place in its various offices. Itiviti develops actions plans and KPIs to make sure that words are followed by actions. Itiviti's actions in this area are based on Itiviti's Environmental Policy and the CSR Manual.

Labour & Human Rights

Itiviti aims to contribute to human well-being, recognizes the individual value of employees and treats them with respect and dignity. Itiviti strives to provide a safe and healthy working environment for all employees. Work environment aspects are considered in all relevant decisions relating to the business. Itiviti complies with applicable labour laws in all countries. [Please view Itiviti's Work Environment Policy, Employee Manuals, the Itiviti Code of Conduct and the CSR Manual for further information.](#)

Moreover, Itiviti takes steps to encourage business partners, suppliers and other related parties, that it is in position to influence, to abide by the same principles.

Working Conditions

Itiviti aims to implement fair working conditions, beyond its legal requirements.

Itiviti seeks to ensure that career management policy and its communications with employees are transparent, consistent with Itiviti's CSR Policy and enhance the welfare of all. Itiviti aims to maintain high employee qualification, so training remains a fundamental part of our employee investments.

Promoting diversity and gender equality

Itiviti is a global company. It values and respects different cultural backgrounds and traditions and promotes an inclusive and diverse workplace where different ideas, origins, experiences and perspectives are respected and valued. [Please view our Gender Equality Policy, Code of Conduct and CSR Manual for further information.](#)



Discrimination and harassment

Itiviti is committed to promoting a healthy work environment free of discrimination and harassment. Itiviti tolerates no discrimination based on age, race, sex, religion, sexual orientation, marital status, social origin, political beliefs, ethnic background or disability.

These principles apply not only to Itiviti employees but also extends to its business partners. Please see our Gender Equality Policy, Harassment Policy, Code of Conduct and CSR Manual for further information.

Health and Safety

Itiviti regards Health and Safety as a vital, integral part of the Group's management. Itiviti believes that improving safety and health conditions is a cornerstone of the company's activities that extends to all levels of the company and the Group. Itiviti provides a safe, healthy and respectful work environment for employees, by complying with all applicable laws, regulations and internal health and safety requirements.

Employers have a general duty to ensure the health, safety and welfare of their employees as far as is reasonably practicable, which includes providing safe systems, a safe place for work and suitable arrangements for employees' welfare.

Itiviti recognizes its duties and accepts them. Itiviti conducts its business efficiently and effectively whilst protecting the health, safety and welfare of its staff, clients and suppliers and any others that may be affected by its activities so far as is reasonably practicable. Itiviti is committed to providing, maintaining and seeking continuous improvement on health and safety at work.

Overall responsibility for health and safety belongs to the Committee for Health and Safety ("CHS"). The CHS is composed of the members of the Executive Leadership Team, including the Global Head of Human Resources (CHRO).

Respect for 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 is committed to conduct its business in a manner that respects human rights and exercises due diligence to understand, identify and mitigate any actual or potential impacts on human rights in which it may be involved whether directly or indirectly through its own activities or business relationships.

Freedom of Association and Collective Bargaining

Itiviti recognizes the right of its employees to join associations of their own choosing or to refrain from joining, and the right to collective bargaining, unless otherwise prohibited by law.



In this context, the company commits to establishing dialogue, negotiating and collaborating in good faith, with the chosen representatives.

Prohibition of Child Labour and Human Trafficking

Itiviti recognizes and honours 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 labour and prohibits underage workers in the workplace.

Itiviti formally forbids the use of forced labour, including slave labour, prison labour, indentured labour, debt bondage and any form of human trafficking.

Itiviti will not tolerate any acts or behaviors by its suppliers, partners or employees that constitute acts of modern slavery or human trafficking.

Itiviti has taken steps in order to ensure that its supply chain is free from slavery and human trafficking and publishes each year its Slavery and Human Trafficking Statement.

Ethics

Itiviti practices fair and transparent ethics management and ethics are an essential part of Itiviti CSR strategy. It is so important that Itiviti has established a solid Code of Conduct implemented throughout the organization.

Prohibition of Bribery and Corruption

Itiviti maintains the highest standards of integrity in all its business interactions. Any and all forms of corruption, extortion, bribes, or other means of obtaining undue advantage shall not be offered, accepted, and are strictly prohibited.

Itiviti has developed a policy based on international standards and implemented such requirements by training its employees. Please view our Anti-Corruption and Anti-Bribery Policy and Manual for further information.

In addition, employees at Itiviti are required to read the Competition Manual and the Export Control and Trade Sanctions Manual for useful examples and practical guidelines.

Stakeholders and Community Engagement

Itiviti aims to engage with all stakeholders, including employees, management, customers, suppliers, partners, consultant and the community to instill a socially responsible culture that espouses the principles of sustainable business through communication, good governance, awareness the consequences of one's actions, accountability, and transparency.



These commitments can be reflected through meaningful collaborative initiatives focusing on improving the quality of life and contributing to socioeconomic development in these communities.

Applicability

This policy applies to all employees of Itiviti Group AB and its subsidiaries. Itiviti shall implement this policy whilst complying with local laws and regulations, which take precedence.

This CSR Policy and the CSR Manual may be complemented by local policies tailored to local culture and regulations. In the absence of a local policy, this Policy applies. In case of conflict between this CSR Policy and a local regulation, the latter shall prevail.

Related Documents

- CSR Manual
- Gender Equality Policy
- Sexual Harassment Policy (Appendix 1 to Work Environment Policy)
- Code of Conduct
- Work Environment Policy
- Employee Manuals
- Whistleblowing Policy
- Environmental Policy
- Slavery and Human Trafficking Statement
- Competition Manual
- Export Control and Trade Sanctions Manual
- Anti-Corruption and Anti-Bribery Policy
- Anti-Corruption and Anti-Bribery Manual

Owner

Chief Compliance Officer / Chief Legal Officer.

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