

# Modern Slavery Policy

## 3 Step IT (UK) LTD

3 Step IT (UK) Limited is committed to driving out acts of modern day slavery and human trafficking within its business and from within its supply chains, including sub-contractors, and partners.

The Company acknowledges its responsibility within the Modern Slavery Act 2015 through publication of a policy statement setting out the steps we take to prevent modern slavery and related abuses.

### Introduction

This statement sets out 3 Step IT (UK) Limited's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 2018.

As part of the IT Remarketing & Finance industry, the Company recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The Company is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

### Company structure and supply chains

This statement covers the activities of 3 Step IT (UK) Limited:

Sustainability lies at the core of 3 Step IT (UK) Limited business our purpose is to be the leading life cycle management service provider, while making the circular economy a reality. Our whole approach is designed to make IT more sustainable for our customers. Sustainability applies not only to what we do, it also applies to the way we do it.

3 Step IT (UK) Ltd core activity is to deliver IT Lifecycle Management Services, including IT asset disposal to medium and large sized organisations based within the UK. In the UK we have around 30 staff mostly of whom are based out of the UK.

The Company currently operates in the following countries:

- 3 Step IT (UK) Ltd are a subsidiary of 3 step IT Group OY, as a group of companies we operate from Finland, Denmark, Sweden, Norway, Estonia, Asia. The services that we provide from these locations are the delivery of IT Lifecycle Management services, including IT asset disposal, along with selling our refurbished assets.

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

In 2018, we reviewed the risk of modern slavery within our business and supply chain by considering geography, the type of work being carried out and the type of labour being used. Based on this, we believe the risk of modern slavery in our direct employment workforce is very low. This is because our employees are largely well educated and/or skilled.

## Responsibility

### Responsibility for the Company's Anti-Slavery Policy

3 Step (UK) Ltd Board of directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations. However, the day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, and dealing with any queries will be with the UK Country Manager, together with Human Resource Manager.

All employees are encouraged to raise any concerns about suspected modern slavery associated with our business or our suppliers. The first reporting line would be their line manager, who will then raise it with the Country Manager or Human Resource Manager, the companies Whistleblowing policy will then be followed which can be found in the staff handbook 2018 under section 13.

As part of Development and Training Our Staff have to complete On-line awareness training courses, we encourage all our staff to complete an e-learning module in regards to Modern Slavery. This training module gives our staff knowledge on how to report and acknowledge how to handle modern slavery around the workforce; it also gives them a small insight into the Modern Slavery Act 2015.

### Relevant policies

The Company operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

**Whistleblowing Policy:** our companies whistleblowing policy supports responsible behaviour and compliance with laws, regulations and 3 Step IT (UK) Ltd values. These values and ethical norms are set out in our Code of Conduct, anti-corruption anti-fraud and anti-harassment policies. Our whistleblowing policy complements and supplements these policies.

3 Step IT Group offers a whistleblowing service to provide an alternative and anonymous way of raising concerns of non-compliance with 3 Step IT (UK) Ltd values, guidelines, and ethical norms as well as laws and regulations. It also provides a way to raise concerns when the whistle blower simply does not know whom to contact when they make their report.

**3 Step IT (UK) Ltd code of conduct:** As a customer, supplier or partner we seek to develop enduring commercial relationships supported by sustainable business practices. While we need to meet the ethical, legal, environmental and economic requirements set by society, our sustainability values take us further.

Our human resource policies require more than simply implementing employment law with barely competitive rates of pay. As an employer we seek to offer meaningful work and fulfilling careers, to employees who are fairly rewarded, and have good work-life balance.

This code of conduct states 3 Step IT (UK) Ltd sustainable principles as they apply throughout the company, its local organisations and subsidiaries. These principles extend to our commercial practices, to suppliers through contractual agreement, and to our employees and directors.

This code has been approved by 3 Step IT (UK) Ltd Directors. Its principles and the associated policies are reviewed regularly in the annual cycle of Board agenda topics.

**Recruitment Policy:** the Company either directly sources candidates or uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. The Company assesses and reduces the risk in the business of modern slavery practices occurring e.g. checking the authenticity of papers proving a right to work in the UK

### **Due Diligence**

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

All Supplier that we class, as high risk must:

- Complete our modern slaver act due diligence questionnaire, which cover their governance, policies and asks them to confirm that they adhere to the Modern Slavery Act 2015.

All our Rental Suppliers will receive:

- A Vendor Authorisation Instruction will also be, sent out to all our suppliers advising them that we expect them to observe and comply fully with the Modern Slavery Act 2015.

### **Key Performance indicators (KPI's)**

The Company has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the Company is:

- Requiring all staff to have completed training on modern slavery by Nov 2019

### **Training**

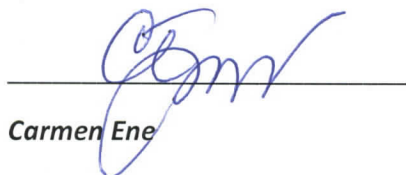
The Company requires all existing and new staff within the Company to complete training on modern slavery. This will be an online training module that will be, emailed out to all existing staff and new staff. This Training is to be repeated on a bi-annual cycle.

### **Awareness-raising programme**

Over the course of the next financial year we will look at raising awareness of the modern day slavery both within our business and our supply chains, as we fell this is part of our ethical strategy to promote.

*This statement has been approved by, the Company's board of directors, who will review and update it annually.*

Signature:



Name:

**Carmen Ene**

Position:

**A member of 3 Step IT (UK) Ltd Board of Directors**

Date:

31<sup>st</sup> Jan 2019