



STEFANINI EMEA CSR POLICY

CONFIDENTIALITY STATEMENT

This document contains information that is proprietary and/or confidential to Stefanini. It is not to be disclosed, in whole or in part, without the express written authorization of Stefanini. It shall not be duplicated or used, in whole or in part, for any purpose other than to evaluate this proposal.

Copyright 2020 Stefanini - All Rights Reserved

Applicability: as of October 1st, 2020

Owner of policy: HR Department

Approvers: HR Manager, Marketing Director, Finance Director

CHANGELOG

Revision no	Date of revision	Section	Revised by	Approved by	Reason for change
1	September 30 th 2020	Entire policy	Andreea Stanescu	Andreea Miron Tania Herzezeel Eliza Irimia	Policy creation

TABLE OF CONTENTS

- 1. Introduction to Corporate Social Responsibility (CSR)**
- 2. Who we are**
- 3. Compliance**
- 4. Looking after Employees**
- 5. Looking after Customers**
- 6. Suppliers' Standards**
- 7. Learning**
- 8. Protecting and preserving the Environment**
- 9. Community Engagement – Supporting the community**
- 10. CSR Charity Stefanini EMEA**
- 11. Measurement**
- 12. Monitoring**
- 13. Revision and Withdrawal of the Policy**

1. INTRODUCTION TO CORPORATE SOCIAL RESPONSIBILITY (CSR)

CSR refers to the way in which businesses regulate themselves in order to ensure that all of their activities positively affect society as a whole. CSR policies aim to guarantee that companies work ethically, considering human rights as well as the social, economic and environmental impacts of what they do as a business. Businesses should meet, and aim to exceed, any relevant legislation, and if legislation does not exist in a particular area, the company should ensure they carry out best practices anyway.

Stefanini Group is committed to ensuring that any business undertakings are conducted as ethically as possible by following the below policy.

1.1 Purpose

This policy intends to accomplish the following objectives:

- Ensure that there is a clear understanding of Stefanini CSR approach and policy;
- Clarify which are the departments involved when organizing CSR actions/events;
- Clarify the process of joining/organizing the respective CSR actions/events;
- Clarify the budget owner and approval flow.

1.2 Scope of the Policy

This policy is applicable at EMEA level, in all countries where Stefanini activates, and regulates the CSR approach of the company as well as the way CSR actions are organized at the EMEA level.

2. WHO WE ARE AND WHAT WE DO

We are a global company with 30 years of experience in the market, offering a robust selection of services such as automation, cloud, Internet of Things (IoT) and user experience (UX).

Today, we provide a broad portfolio of solutions, combining innovative consulting, marketing, mobility, personalized campaigns and artificial intelligence services with traditional solutions such as service desk, field service, and outsourcing (BPO). We maintain our excellence by investing in technological innovations, the best partnerships, acquisitions of companies worldwide, and the hiring of highly trained professionals.

3. COMPLIANCE

3.1 Legality

Our company will:

- Respect the law
- Honor its internal policies
- Ensure that all its business operations are legitimate
- Keep every partnership and collaboration open and transparent

3.2 Business ethics

We'll always conduct business with integrity and respect to human rights. We'll promote:

- Safety and fair dealing
- Respect toward the consumer
- Anti-bribery and anti-corruption practices

4. LOOKING AFTER EMPLOYEES

4.1 Protecting people

We'll ensure that we:

- Don't risk the health and safety of our employees and community.
- Avoid harming the lives of local and indigenous people.
- Support diversity and inclusion.

4.2 Human rights

Our company is dedicated to protecting human rights. We are a committed equal opportunity employer and will abide by all fair labor practices. We'll ensure that our activities do not directly or indirectly violate human rights in any country (e.g. forced labor).

4.3 Volunteering

Our company will encourage its employees to volunteer. They can volunteer through programs organized internally or externally. Our company may sponsor volunteering events from other organizations.

According to **Stefanini EMEA 2020 Internal Regulations**, Stefanini EMEA follows the following fundamental principles:

"2.3. FUNDAMENTAL PRINCIPLES

2.3.1. Principle of Equality and Non-Discrimination

- a) *Within labor relationships the principle of equality of treatment for all the employees is in operation;*
- b) *Any direct or indirect discrimination against an employee, based on criteria of gender, sexual orientation, genetic traits, age, nationality, race, color, ethnic group, religion, political choice, social origin, disability, family situation or responsibility,*

- trade union membership or activity is forbidden.*
- c) *Direct discrimination means the documents and acts of exclusion, difference, restriction or preference based on one or several of the criteria set forth above that have the purpose or the effect of failure to grant, restriction or removal of recognition, use or exercise of the rights provided in the labor legislation;*
 - d) *Indirect discrimination means the documents and acts apparently based on criteria other than those set forth above but which produce the effects of a direct discrimination.*

2.3.2. Right to Protection, Security and Respect for Dignity

- a) *Any employee carrying out work, benefits from working conditions appropriate to the job performed, of social protection, occupational security and health, as well as respect of his/her dignity and conscience, without any discrimination;*
- b) *All employees carrying out work are recognized the rights provided by law, the individual employment contract, the applicable collective labor contract (to the extent such exists) and these regulations.”*

5. LOOKING AFTER CUSTOMERS

At Stefanini, we believe listening to our customer is a key component in delivering quality products and services. We are committed to meeting our customers' quality expectations and actively adopting relevant quality standards. Our quality commitment is driven by our employees' dedication, loyalty, accountability, honesty and discipline, which ultimately translates into being part of a team that shares similar values with Stefanini's customers.

6. SUPPLIERS' STANDARDS

It is vital to ensure that Stefanini uses good suppliers and maintain a good working relationship with them.

The following principles are applicable to all Stefanini suppliers:

- as far as applicable to the suppliers, adherence to Anti-Money Laundering legislation in the relevant local legislation
- adherence to Stefanini's code of ethics, antibribery and corruption policy
- adherence to Stefanini's requirements regarding data protection, information security and confidentiality
- adherence to Stefanini's contractual provisions regarding compliance, ethics, code of conduct and CSR in general
- as far as applicable to the suppliers, adherence to the Modern Slavery Act 2015 (UK) or similar local legislation
- suppliers must operate in line with the Bribery Act 2010 (UK) or similar local legislation
- suppliers that execute their supplies, works or services in accordance with their contract with Stefanini will be paid properly and on time
- suppliers are encouraged to have a CSR policy in place

- clear communication with suppliers.

7. LEARNING

We will actively invest in R&D. We will be open to suggestions and listen carefully to ideas. Our company will try to continuously improve the way it operates.

8. PROTECTING AND PRESERVING THE ENVIRONMENT

Our company recognizes the need to protect the natural environment. Keeping our environment clean and unpolluted is a benefit to all. We'll always follow best practices when disposing garbage, hardware and devices and using chemical and other substances.

Apart from legal obligations, our company will proactively protect the environment. Examples of relevant activities include:

8.1 Waste Reduction, Reusing and Recycling

We make sure to recycle our IT equipment, using an external provider; following the recycling of our IT equipment, the company receives an official certificate.

The rest of the waste is collected in separate containers that we have placed on floors and for which we have a contract with a recycling company to collect and capitalize. We collect paper, plastic, glass, metal, batteries.

8.2 Using environmentally-friendly technologies

According to Stefanini Car Fleet Policy, all eligible employees have the possibility to choose from a variety of new cars with environment friendly systems only.

9. COMMUNITY ENGAGEMENT – SUPPORTING THE COMMUNITY

Our company may initiate and support community investment and educational programs. For example, it can provide support to nonprofit organizations or movements to promote cultural and economic development of global and local communities.

Stefanini is committed to engage with the local community in activities like

- Sponsorship of or monetary donations to: local charities, sports clubs, societies, youth groups, community centres, or anything else you feel appropriate.
- Support local charities etc. by donating time i.e. staff participation in volunteering days.
- Supporting the surrounding community by employing local people.

10. CSR CHARITY STEFANINI EMEA

This section specifies which is the process to follow when the company gets involved in CSR actions, what kind of actions could be organized, who is responsible for organizing them.

10.1 Priority Areas of Charity Actions

The Company defines the following priorities for charity activities:

Education.

Supporting initiatives and projects in the field of education, including projects aimed at supporting educational institutions: schools, universities, training centers and others, as well as targeted assistance to gifted children and students.

Culture.

Supporting initiatives and projects in the field of cultural and spiritual heritage, developing creativity in children, as well as supporting cultural institutions, including theaters, museums, historical and cultural monuments etc.

Healthcare.

Supporting initiatives and projects in the field of healthcare and disease prevention, including targeted support to severely ill children, as well as promotion of public health institutions.

Sports.

Supporting initiatives and projects in the field of sports and healthy lifestyle, promoting development of sports for children, as well as assisting physical training institutions, supporting sports teams and individual athletes.

Environment.

Supporting initiatives and projects in the field of environmental protection, including projects on environmental education and awareness.

Socially disadvantaged people.

Support for:

- socially disadvantaged groups of the population in the countries where Stefanini is present, including provision of charity support, targeted assistance to the disabled,

retired, veterans as well as orphanages and boarding schools and targeted assistance to orphans;

- initiatives and projects for motherhood and childhood protection;
- victims of natural disasters and man-made disasters.

10.2 Approach of Stefanini EMEA Charity Actions

Stefanini EMEA's Charity Action approach is to identify local needs, collaborating with NGOs or charitable organizations from different countries (all Stefanini EMEA locations) and to get involved in different actions or events, which might have an impact in the society. Objectives of the CSR campaigns at EMEA level are:

- Help vulnerable categories of people
- Improvement of the living conditions of the underserved communities/groups;
- Contribution to environmental protection;
- Awareness regarding our society's problems;
- Promotion of a helping and caring attitude among our employees & encouragement of kindness acts.

All Stefanini EMEA Charity Actions are developed together with Stefanini employees, in order to encourage and promote a caring and helpful attitude, to raise awareness in terms of social gaps and issues.

In considering support for proposed charity projects and programs the Company gives preference to projects that meet the following requirements:

- comply with charity priority areas, specified in the Priority Areas of Charity Actions section of this Policy;
- are implemented in the countries where Stefanini EMEA is present and contribute to the formation of resources for the regions' sustainable social and economic development;
- are implemented in a systematic manner, have a long-term nature and are aimed at solving important social problems;
- are timely implemented and in demand on behalf of all stakeholders and meet the strategic interests of the Company's business;
- are designed in the form of targeted projects or programs and imply achievable goals and performance assessment indicators;
- use the best practices and modern technologies in the social sphere.

10.3 Responsibility of Process

The current CSR policy as well as all the CSR actions developed at EMEA level are under the direct supervision of the EMEA CSR Committee.

The members of EMEA CSR Committee are:

- EMEA Marketing Director
- EMEA Finance Director
- EMEA HR Manager

The CSR actions and events are currently under HR BP Team responsibility, through the local HR BP representatives of each country.

The CSR budget is under EMEA Marketing department, the approver of the yearly budget, as well as for each and every action proposed, is the Marketing Director; the overall yearly budget is agreed and approved by the Board of Stefanini EMEA.

The payment for each CSR action (sports events, donation, other group events, products acquisition) is done through the Purchasing department, based on the Purchase Order ; the Purchase Order should be initiated in the internal system by the project owner and approved by the budget owner.

All CSR actions and events are communicated internally and externally with the involvement of the Marketing Team.

10.4 Process

All Charity Actions are centralized and planned for the entire year for all locations; charity Actions are proposed by the HR BP team (based on their own research and based on past with successful results), by Stefanini CSR Ambassadors (group of people who voluntarily decided to get involved in the program) or by any other Stefanini employee.

The Charity Actions are discussed together with and approved by Marketing Director, taking into consideration the purpose, the impact and the budget. Charity Actions are organized and implemented by HR BP Team, communicating each action or event internally to all employees; most of the Charity Actions suppose involvement from all other Stefanini employees.

When the company supports any kind of cost for the Charity Actions, proper documentation has to be prepared. HR BP Team/the CSR project owner will discuss with Purchasing and Legal department in order to choose the correct kind of documentation (sponsorship contracts, commercial contracts etc.).

The requested budget for each action has to be approved through the internal system as well: the project owner initiates a Purchasing Order, which is approved by the budget owner.

10.5 Criteria for Charitable partnerships

- They must be a registered charity or a charity that is examined in an objective way not to be a scam, fraudulent or abusive.
- Participation in one Charity Action may not be discriminatory towards other Charity Actions, in case of equally valuable Charity Actions the budget should be equally split over such Charity Actions.
- Their purpose should align with supporting a wider objective as per the Priority Areas of Charity Actions section
- They should not support any fraudulent actions, convicted criminals, persons or organizations with contested or questionable reputation, extremists, political or religious cause.
- Consideration should be given to any prominent charities that are supported by local stakeholders.
- Consideration should be given to charities or causes that employees in a particular country indicate they are particularly passionate about.

11. MEASUREMENT

Our company is committed to the principles of the United Nations Global Compact. We'll readily act to promote our identity as a socially aware and responsible business. Management must communicate this policy on all levels. Managers are also responsible for resolving any CSR issues.

12. MONITORING

Stefanini Group's management, under the supervision of its Board or its Audit Committee, shall take reasonable steps from time to time to (i) monitor compliance with this CSR Policy, and (ii) when appropriate, impose and enforce appropriate disciplinary measures for violations of this CSR Policy.

Disciplinary measures for violations of this CSR Policy may include, but are not limited to, counseling, oral or written reprimands, warnings, termination of employment or service. Stefanini's management shall periodically report to the Board or the Audit Committee, as applicable, on these compliance efforts including, without limitation, periodic reporting of alleged violations of this CSR Policy and the actions taken with respect to any such violation.

13. REVISION AND WITHDRAWAL OF THE POLICY

The Company reserves the right to amend, suspend or withdraw this policy upon reasonable notice and the content of this policy will be subject to regular review.

