twoday

Environmental, Social and Governance Policy

1. Purpose

The purpose of this policy is to establish an ESG (Environmental, Social and Governance) Framework that enables twoday to foster a secure and healthy workplace for our employees, minimise our environmental impact, and ensure that we create value for our stakeholders by developing digital solutions for a better tomorrow.

2. Scope

The ESG Policy applies to all twoday companies.

3. Policy

As a newly established company, twoday is committed to building a sustainable and coherent organisation. We know that sustainability is about more than just reducing emissions and aim to develop impactful digital solutions that support the development of a robust and sustainable world. Our focus on digital transformation and our purpose to create a better tomorrow through technology are at the forefront of our mission.

At twoday we believe that our operations and services have a positive impact on society and drive change toward sustainable business practices. We recognize that there is more to be done to meet the needs of the planet and society and are committed to contributing to the UN's 17 Sustainable Development Goals (SDGs) and the 2030 Agenda. We believe that a multilateral collaboration at all levels of society is necessary to achieve these goals, and we take a collective approach to meet selected SDGs. We encourage our companies to under-take initiatives and partnerships in their countries and local communities.

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In the first part of 2023, we conducted a materiality assessment to identify specific environmental, social and governance (ESG) issues that are crucial to us. Based on the findings, we have defined our ESG strategy and key performance indicators (KPIs) and initiatives.
Our sustainability initiatives are structured around three primary pillars:

1. A Better Tomorrow
Slowing down global warming demands collective effort. twoday is committed to being carbon neutral by 2030.

2. People first
Be perceived as a diverse, equal and inclusive workplace that allows more diversity to thrive in tech and enable tech learning and development within our company, customers and society

3. Enabling customer sustainability
By applying digital solutions

Being a responsible corporate citizen is not only something we want to do, but also something we are required to do to minimise adverse impacts on the environment. For us, sustainability is an opportunity to make a meaningful impact. It aligns with our purpose "Creating a better tomorrow through technology" and our core values Heart, Drive, and Adaptability. It also reflects our concern for the well-being of our planet and communities. Engaging in sustainability initiatives allows us to contribute to something larger than ourselves and be part of a positive change.

Sound business practices include minimising waste and the use of natural resources and energy throughout our value chains, avoiding involvement in any negative impacts on human rights or corruption, and always considering the true cost of our actions.

Environmental footprint

An individual's environmental footprint refers to their impact on the air, land, and water which are essential for our survival. This impact encompasses the resources we utilise, the energy we consume, and the waste we generate. It involves where we source our resources, how we utilise them, and how we dispose of them.

The technology industry is no exception, and although we do not produce physical goods in twoday, we can still contribute to reducing the environmental impact. With over 8,000 customers who consume vast amounts of data, twoday can minimise its environmental footprint by utilising technology to identify and improve its impact on the environment.

At twoday, we aim to minimise waste by reducing our consumption and managing our waste responsibly. This principle applies to everything, including food, energy and materials. We aim to lower our energy consumption while ensuring that the energy we do use is from renewable sources. Additionally, we strive to avoid unnecessary work travel and we conduct as many of our meetings as possible online. Moreover, in our pursuit to understand and mitigate our impact better, we're set to conduct a comprehensive carbon footprint assessment. By the beginning of 2024, we plan to establish Science-Based Targets (SBTIs) to define accurate, tangible, and measurable objectives, underpinning our commitment to becoming carbon neutral by 2030.

We believe that protecting the environment is a fundamental principle for conducting business. We recognise that we live in a world with limited resources, and our well-being depends on the natural world and its biodiversity. In recognition of this, by 2024, we are set to roll out an IT Hardware strategy emphasising the principles of reuse, reduction, and recycling of our electronic waste. We believe that all businesses have a responsibility to combat climate change and use the world's limited resources responsibly. The transition to a low carbon, resource efficient, and circular economy, in line with the SDGs, is critical to ensuring long-term competitiveness.

Furthermore, all twoday employees have a responsibility to contribute to the company's work for the environment. We strive to meet or exceed stakeholder expectations regarding sustainability and consider this aspect in all our business decisions. By making sustainable choices, we can inspire others to follow.

 We are committed to become carbon neutral by 2030 and enable our customers sustainability by:

- Carbon footprint assessment: Aligned with GHG Protocol to set tangible, Science-based emission reduction targets (SBTI`s)
- ISO 14001 Certification - Demonstrating dedication to internationally respected environmental standards
- Renewable energy transition: Prioritising green energy resources.
- Energy-efficient cloud solutions: Adoption of green coding, data centers, and scalable solutions for optimized energy usage.
- Future IT Hardware Strategy: Emphasis on circularity, aiming at waste reduction and recycling.
- Create solutions that last and seeks to limit our technology's environmental impact where possible
- Launch new product and service offerings that enable organisations to meet their sustainability commitments
- Avoid unnecessary worktravel

Social and people

The role of digitalization is crucial in effecting change in our society, and our employees are instrumental in driving this change. We recognize that our employees are our greatest asset, and we embrace differences in backgrounds, experiences and skills as they lead to fresh and innovative perspectives, ultimately resulting in better business outcomes. Diversity, equity, inclusion, and belonging are critical business imperatives that help us attract, develop, inspire and retain the best talents, and enable us to create products that meet our customers' needs.

As a professional IT Consulting and Software Solutions Company, we consider the risks of modern slavery and human trafficking in our global business to be low. Adhering to applicable employment laws is important to us, and we commit to ensuring compliance with all employment legislation, including laws relating to employee wages and working conditions, in all the countries where we operate.

We unequivocally prohibit any form of discrimination, harassment or bullying. We strive to eliminate discrimination from all our processes, including recruitment and promotions, and we ensure that decisions are based on fair criteria such as job content, responsibilities, educational demands, performance, and experience level. Our compensation is based on these criteria, and we ensure that equal pay is given for equal work across all our companies.

We monitor our adherence to these policies and encourage the reporting of any (suspected) incidents of discrimination or abuse through the whistleblowing channel or by reporting to one's manager or the manager's manager.

For more information on our commitment to diversity and inclusion, please refer to our Diversity, equity, inclusion, and belonging policy and Code of Conduct.

We care about the health and wellbeing of our people and society, and accept everyone for who they are by:

Fostering a more diverse, equitable, inclusive and belonging culture for our people

- Ensuring that everyone has equal access and equal opportunities
- Equal pay for equal work
- Zero tolerance for discrimination
- Mandatory DEIB trainings, e.g hidden disabilities (neurodiversity) and unconscious bias
- Engage with tech communities and/or NGOs to attract more diversity to tech roles
- To enhance our hiring practices and establish a workforce that mirrors the diversity of the communities we serve.

Governance

At twoday, we conduct our business with ethical standards, integrity and transparency. It is the responsibility of every employee to be aware of legal and ethical issues that may impact our business. We must always act with integrity, especially when it comes to gifts and hospitality, corruption, violations of human rights, data protection issues, security incidents or other unlawful behaviour involving customers, suppliers and business associates.

To ensure accountability and responsibility throughout the top management of the company, twoday has a two-tier management structure consisting of a Board of Directors and Executive Management. We operate in compliance with applicable laws and recommendations on corporate governance throughout the organisation.

We have implemented an Anti-bribery and Anti-corruption Policy along with our Code of Conduct, which outlines our guidelines of conducting business in an ethical manner with a solid moral foundation.
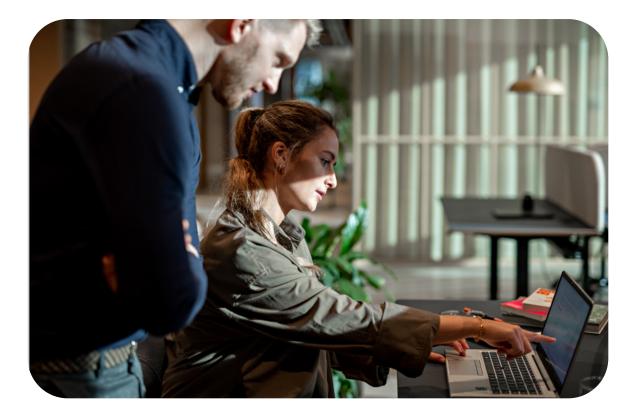
The legal environment is constantly changing, and new laws and regulations are taking effect to control the collection, use, retention, disclosure and disposal of personal information and data in general. The rate of cyber-attacks, data breaches and unauthorised use of data is increasing. Therefore, it is more important than ever to understand the rights and obligations of individuals and organisations with respect to personal information and customer data. We will provide regular training for employees on data privacy and security best practices.

twoday is committed to maintaining the highest level of security for our digital assets, networks, systems, customers and partners. Privacy and security are embedded into everything we do, and we choose to be transparent. We are not afraid to admit our mistakes and understand our responsibility for our customers' data.

twoday recognizes the importance of managing ESG-related risks and will therefore integrate ESG risk assessments into our overall risk management framework. We will regularly review and update our risk management processes to identify, assess, and mitigate ESG risks, by this we will maintain a proactive approach to addressing emerging ESG risks and opportunities.

At twoday, we support and respect the protection of internationally proclaimed human rights. We will not tolerate any violations of human rights within the organisation or among our suppliers, partners, customers, or other stakeholders.

We actively take a stand against corporate misconduct, and are committed to:

- Report all suspected breaches of local and/or EU/EEA law from both inside twoday and outside through twodays Whistleblowing Channel
- Monitor and report on all material disputes and infringements, court cases and judgements officially filed against twoday
- Preserve human rights through how we act and the solutions we provide
- Invest in protecting the data and information we possess and process
- Activities are in accordance with all local, EU, and international laws

4. Purpose

Related Standards, Policies and Processes:
- [DEIB policy](#)
- [Code of conduct](#)
- [Supplier code of conduct](#)
- [Anti-corruption policy](#)

5. Compliance

twoday companies are free to supplement policies with requirements and guidelines specific to their areas' needs and risks, providing group policies are not in any way reduced or compromised.

6. Non-Compliance

Violation of this policy will be brought to the attention of the respective supervisors for appropriate follow-up actions.

Repeated or serious violations may result in severe disciplinary action up to and including dismissal, under the supervision of HR.

7. Updates to the Policy

This Environmental, Social, and Governance (ESG) Policy is reviewed and approved on an annual basis to confirm its effectiveness and relevance in light of the latest legal statutes, regulatory developments, and sector-specific best practices. It is our commitment to continuous improvement and adaptation to the evolving landscape of sustainability and governance. Any revisions or changes to the policy will be communicated through established channels, with a commitment to transparency and accountability.

Last reviewed and approved: **August 2023**

Please direct any inquiries or feedback to **mouna.arntsen@twoday.com**

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We create a **better tomorrow** through technology