



CSR Policy Document 2025 - 2026

Trinity Software Center



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Table of Contents

1. Introduction	3
2. Governance and Compliance	4
3. Stakeholder Engagement.....	6
4. Environmental and Climate Change	8
5. Labour and Human Rights.....	9
6. Responsible Supply Chain	10
7. Monitoring, Reporting and Continuous Improvement.....	11
8. Communication	11
9 Official approval.....	12
ANNEX	13
🌐 Draft Website Text: CSR & Social Enterprise Commitment	13

1. Introduction

Trinity Software Center (TSC) is a fairtrade IT company based in Kumasi, Ghana, with a mission to create meaningful career opportunities for young African software engineers. As a social enterprise, we integrate Corporate Social Responsibility (CSR) at the heart of our operations.

This policy sets out our commitments under the **VSME EU directive**, as well as OECD and ILO guidelines on fair trade and outlines further steps in this field foreseen in 2025 and 2026.

Since our inception, Trinity Software Center has been committed to fair working conditions and creating quality jobs for African youth from underprivileged families. We are now taking our commitment to responsible entrepreneurship to the next level with particular attention to

- The environment (CO2 footprint and waste reduction)
- Stakeholder involvement (employees, customers and vendors)



ESG4SME is a SAAS providing SME a simple and affordable reporting tool on ESG, following the latest VSME directives of the EU. As a social enterprise, ESG4SME has decided to have its software built by Trinity Software Center. At the same time we will be using that same software to report on all our CSR activities and VSME metrics. Our annual ESG report will be published on our website together with this policy document. By doing so, we comply with the latest EU standards for SME businesses.

2. Governance and Compliance

Since its inception in 2017 we have been committed to work for the EU market and comply with standards that are generally accepted in Europe. We know that it was not an option for us to lower our standards if we want to compete on the EUR market. In particular we have been paying attention to

- Compliance with EU legislation in the field of IT, data protection and cyber security, GDPR as well as Ghanaian data protection policies (currently under revision with the new government of Ghana)
- Compliance with GRA/ Tax Law and Labor Law
- Good Practices in the field of software quality and data governance

These last two years, we have made strong progress in social domains. In 2024–2025, we introduced the following new policy documents:

- Code of Conduct
- Anti-Bribery and Corruption Policy
- Grievance Mechanism
- Regular (6 year) change of external auditors

We also have reviewed and updated of our employment and parental leave policies according to Ghanaian labour law.

In the last three years we have seen a strong international debate on cloud sovereignty and the use of EU cloud providers. In the course of 2025 we are exploring possible cloud services that we can recommend to our customers actively who score well on compliance as well as environmental (green) certification.

Next actions (2025–2026):

Action	Who	Deadline
Formulate KPI and metrics according to VSME directive	Sustainability officer	Oct 2025
Appoint a CSR Officer for internal coordination	MT	Aug 2025
Finalize and roll out an internal CSR strategy with measurable KPIs	Sustainability officer	Jan 2026
Conduct an annual CSR audit for transparency	Sustainability officer	Feb 2026
Annual ESG report & publication on website	Sustainability officer	March 2026
Sustainable and compliant cloud strategy	CTO	Oct 2026
Train all staff on ethical business conduct and anti-corruption in general meeting	General manager	October 2025
Setup compliance archive and monitoring of new legislations	QA and data protection manager	1 July 2026

3. Stakeholder Engagement

Stakeholder inclusion is essential for our integrity and impact. As a matter of fact, the majority of Trinity Software Center clients are social enterprises with a strong commitment to CSR. Because of this strong DNA it is not a coincidence that we partner with many clients who also have a core mission to make this world a better place.

Excellent examples are [DATA FUTURE](#) - [PROJECT CONNECT – SMART FARMING](#) [add logos]

While we have been in close collaboration with [MAXIM NYANSA FOUNDATION](#) an NGO with a similar mission. We have not only built their software (an online digital library for free learning for all young Africans) and websites, but our staff regularly volunteer as trainers in their bootcamps for young IT professionals from underprivileged families.

Our staff is also aware that we are a fairtrade software company and we expect them to sympathize with our mission. Click on the link to this inspiring video of one of our senior engineers Isaac Quaye.



As the immediate result of our social DNA, we are often communicating about our social mission to our stakeholders and we have been engaging with them on an ad hoc basis. As our company grows, we will formalize this process in 2025 and 2025.

Action	Who	Deadline
Biannual staff dialogue sessions on CSR themes during our bi-monthly general meetings with all personnel	General manager	1 Sept 2025
Launch of a CSR survey tool we will annually send out this questionnaire to a sample of 20 stakeholders to see how we score sustainability topics.	Sustainability officer	1 Oct 2025
Formalize our partnership with Maxim Nyansa Foundation for future collaboration	General manager	1 Jan 2026
Seek strategic collaboration with KNUST and two more universities for knowledge exchange, internships and research projects	CTO	1 July 2026

4. Environmental and Climate Change

As a software company, our direct environmental footprint is limited. With limited financial resources and office rental that changes regularly we have been mostly very frugal, saving as much as possible on furniture, hardware, electricity and travel costs.

We work remotely for customers in Africa and the EU, and according to our office policy, employees can work from home up to 3 days per week. However as our company grows we see that in some cases it is necessary for our MT and employees to travel to Europe to meet with clients in person. We are conscious that we limit these flights to the very necessary.

However, we acknowledge our role in the broader ecosystem and are initiating some additional actions.

2025–2026 Targets:

Action	Who	Deadline
Pollution: Switch from water sachets to dispensers	General Manager	1 Nov 2025
Pollution: Audit our e-waste practices and build recycling partnership with Maxim Nyansa	CTO	1 Jan 2026
Climate change: Move to energy-efficient devices	CTO	1 Jan 2026
Climate change: Promote eco-friendly hosting by prioritizing data centers with a green energy profile to our customers	CTO	1 Jan 2026
Climate change: limit Ghana – Netherlands trips for sales director to 3 annually	Sales Director	1 Jan 2026
Climate change: calculate our CO2 footprint annually	Sustainability officer	1 March 2026

5. Labour and Human Rights

As a fair trade software company since our inception in 2017 we have always put a lot of emphasis on our labour and human rights standards. We fully comply with ILO and Ghana labour law standards. We currently ensure:

- Fair wages and benefits
- Gender equality and diversity hiring goals
- Training and career development pathways
- Safe working conditions and a clear conflict-resolution protocols

As mentioned in paragraph 2 we have been completing our policies in 2024 and 2025. We have also successfully improved our diversity, employing three new women where traditionally the software industry is highly male dominated in particular in West Africa. We will continue to put additional efforts on hiring women in various roles.

2025–2026 Targets:

Action	Who	Deadline
HR – update all policies	Quality and compliance manager	Aug 2025
HR – share all policies with staff in Google Drive and explain in meeting	General manager	Sept 2025
ESG reporting : identify metrics for “SOCIAL” according to VSME framework and report these over 2025	Sustainability officer	March 2026

6. Responsible Supply Chain

Our supply chain is very modest and not material in our CSR policies. As a result it has not received a lot of attention until now. In 2026 we will explore where we can still make some improvements in various fields of procurement. Some actions have been identified under Environment and Climate Change, such as the purchase of electronics and cloud providers and the use of water dispensers.

For our clients, our quotes always contain an extensive paragraph on our social mission. We actively seek to work with clients with a similar DNA. We will extend this paragraph to our entire CSR policy and formulate more explicit customer criteria.

Action	Who	Deadline
Refer our quotes to our entire CSR policy on our website	Sustainability Officer	Sept 2025
Formulate customer criteria	Sustainability Officer	Jan 2026
Facility management: explore sustainable office requirements for next office rental period	General Manager	April 2026
Facility management: identify sustainable office furniture providers in the Ashanti region	General Manager	April 2026

7. Monitoring, Reporting and Continuous Improvement

As a social enterprise, sustainability is part of our DNA and an integrated part of all our decision making and since 2024 we have been monitoring all our CSR compliance and scores and have been planning for concrete actions for improvement. The following Planning and Control cycle has been put into place to safeguard this:

- A sustainability officer has been appointed by 1 August 2026 e.g. Diana van der Stelt, who is also a shareholder of ESG4SME SAAS software
- KPI will be formulated for Trinity Software Center following the EU framework for SME, eg. VSME.
- A **VSME-compliant ESG report** will be published annually starting early 2026
- The sustainability officer will coordinate annual reviews of progress
- The sustainability officer will do an annual audit after each reporting year.
- CSR will be discussed in our MT on a quarterly basis to monitor all action points.

8. Communication

Since the start of our company we have been using our website and LinkedIn to transparently share our social identity. We will now extend that communication to a new webpage explaining our CSR policy and explain our strong commitment as a social enterprise.

(draft website in ANNEX).

Via our website we will give public access to this CSR policy document as well as our annual ESG/VSME report.

9 Official approval

This CSR policy has been signed and approved by
the Shareholders of Trinity Software Center

Stephen Ofori

Joseph Anto

Anthony Yeboah Asare

1 August 2025

Draft Website Text: CSR & Social Enterprise Commitment

A Software Company with a Social Mission

At Trinity Software Center, CSR isn't a side project—it's our foundation. As a **fairtrade software company** in Ghana, we offer top-quality software development and data engineering teams to African as well as European clients while building meaningful careers for young African IT professionals. Since our inception in 2017 we have been dedicated to hire in particular young university graduates from underprivileged families. We offer them an excellent job opportunity in a team that is dedicated to learning and adopting the latest technologies in the industry.

Because of this strong DNA it is not a coincidence that we partner with many clients who also have a core mission to make this world a better place.

Excellent examples are DATA FUTURE - PROJECT CONNECT – SMART FARMING

While we have been in close collaboration with MAXIM NYANSA FOUNDATION an NGO with a similar mission. We have not only built their software (an online digital library for free learning for all young Africans) but our staff regularly volunteer as trainers in their bootcamps for young IT professionals from underprivileged families.

As of 2025, we are proud to share our updated **CSR Policy** and latest **ESG Report**, aligned with European VSME standards and CBI requirements for sustainable export to the EU.

 [Read our CSR Policy](#)

 [View our ESG Report](#)

Our strong scores in social performance—fair wages, inclusion, and training—have now been complemented by new policies in environmental care, good governance, and anti-corruption.

We're just getting started. Over the next year we'll deepen our work on:

-  Engaging employees and clients in our CSR journey
-  Reducing our environmental footprint (e.g., recycling, green hosting, waste reduction)
-  Developing AI solutions for a better world

By hiring us, you're not just getting high-quality tech—you're investing in purpose, people, and planet.