

## Anti-slavery and Anti-human trafficking statement

### Introduction

Proact IT Group AB (Proact) is aware that slavery, servitude, forced labour and human trafficking (Modern Slavery) is an increasing global concern due to the rise in global migration, which exists across the world in every type of economy.

No industry should be assumed unaffected, and we all have a responsibility to monitor our businesses and supply chains, and to report concerns.

Proact has a zero-tolerance approach to Modern Slavery within our operations and is committed to improving its practices to understand and combat Modern Slavery risks in our supply chains.

We expect our personnel to report concerns, using the appropriate reporting channels, and our management are expected to act upon them.

This statement relates to Proact's financial year 1 January 2021 to 31 December 2021.

### Our business

Proact is Europe's leading specialist in data and information management with focus on cloud services and data centre solutions. We help our customers to store, connect, protect, secure and drive value through their data whilst increasing agility, productivity and efficiency. We've completed thousands of successful projects around the world, have more than 4,000 customers and currently manage hundreds of petabytes of information in the cloud. We employ over 1,000 people in 13 countries across Europe and North America.

Founded in 1994, our parent company, Proact IT Group AB (publ), was listed on Nasdaq Stockholm in 1999 (under the symbol PACT). The Group has a global annual turnover of over €360 million.

The Group is organised into 4 business units (BU): BU Nordics & Baltics (Sweden, Denmark, Finland, Norway, Latvia, Lithuania, Estonia,); BU UK; BU Central: (Germany, Czech Republic); BU West (Netherlands, Belgium).

### Our supply chains

Proact IT Group AB is an independent storage and managed cloud services provider. We have established relationships with world class vendors and our supply chains are extensive including hundreds of suppliers of IT hardware, equipment, and of contracted IT services.

Our Code of Conduct underpins everything we do, from sourcing responsibly and reducing waste to helping the communities in which we operate.

[http://www.proact.eu/About\\_us/Code-of-Conduct/](http://www.proact.eu/About_us/Code-of-Conduct/)

Proact will not support or deal with any business knowingly involved in Modern Slavery. Respecting human rights and environmental issues in our supply chains is ultimately our suppliers' responsibility. As a customer however, we play an important role in supplier development. We have adopted processes to clearly communicate our expectations to our suppliers during our on boarding process, and we ensure all our personnel have an awareness of the importance of due diligence by delivering training sessions.

## Our policies

Proact's policies include our Group Code of Conduct which reflects our zero-tolerance approach to abuse of human rights across the Group and within our supply chains, and our commitment to treat any allegations that human rights are not properly respected very seriously.

We also operate a whistleblowing policy, aimed principally at our personnel, but also to encourage those working in our supply chains and other third parties to report any concerns relating to human rights violations like Modern Slavery. This also includes any circumstances that may give rise to an increased risk of Modern Slavery.

Our whistleblowing policy is designed to make it easy for individuals to raise concerns, without fear of retaliation or negative treatment. All reports will be fully investigated, and appropriate remedial actions taken.

### **Sustainable and ethical procurement policy**

We will ensure there is transparency within our business and that our approach to tackling modern slavery is consistent with our disclosure obligations under the UK Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partners.

We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's code of conduct will lead to the termination of the business relationship.

### **Recruitment policy**

Our recruitment policy reflects our approach to equal opportunities in recruitment, pay and conditions, and we only use reputable employment agencies to source labour.

## Due diligence process for slavery and human trafficking

We are committed to monitor any potential risk areas in our supply chains. As part of our initiative to identify and mitigate risk we carry out a due diligence process for all prospective suppliers to identify and assess potential risk areas in our supply chains.

Our supplier onboarding involves a review of both the prospective supplier, and of the controls taken by the supplier to exercise the same zero-tolerance approach to Modern Slavery to mitigate the risk of slavery and human trafficking occurring in our supply chains.

## Modern slavery initiatives

To ensure all those in our supply chain and contractors comply with the same values as Proact in respect of transparency and Modern Slavery, we have in place a compliance program. Our Modern Slavery initiatives include the implementation of policies, risk assessments, investigations, due diligence, contractual controls and training.

We have a dedicated compliance team, which consists of representatives from the following departments:

- Legal
- Audit and compliance
- Human resources
- Procurement
- Finance

### Contractual controls

All Proact entities are required to have written agreements in place with suppliers, together with a documented supplier onboarding process in place which includes a review of prospective suppliers' approach to Modern Slavery. All suppliers are encouraged to notify Proact immediately if they become aware of any Modern Slavery within their supply chains. Suppliers which breach these obligations will face appropriate actions which could include termination of contracts.

### Training

To ensure a high level of understanding of the risks of Modern Slavery in our supply chains and across the Group, we provide training to our personnel. This includes training on the Group Code of Conduct, and compliance with laws, including those on transparency and Modern Slavery.

All personnel are encouraged to notify Proact immediately if they become aware of any Modern Slavery within Proact's supply chains.

## Review and assessment

Proact has reviewed its supplier onboarding process to include a due diligence process for all prospective suppliers.

We have in place an internal audit program to ensure adherence with applicable laws and regulatory controls, including those of transparency and Modern Slavery

Over the next financial year, we will assess how effective our initiatives have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains. We will continue with training and raising awareness across the Group.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Proact's modern slavery and human trafficking statement for the financial year ending December 2021



Signed.....

**Anna Söderblom, Chair of the Board  
Proact IT Group AB**

**Date 5th May 2022.**

