

Proact IT Group AB

Code of Conduct

Statement by the Board

Proact is Europe's leading specialist in data and information management with focus on cloud services and data centre solutions. We employ over 1,000 people in 13 countries across Europe and North America. We are committed to conducting business sustainably, and in accordance with our core values of integrity, commitment and excellence. Our business is characterised by respect for customers, business partners and our people.

The principles set out in this Code of Conduct are based on these core values and define the fundamental ethical standards that we expect of everyone who works with Proact - including our contractors, suppliers and partners.

Adherence to high ethical standards helps us to hire the best people, to build good relationships with our customers and partners, and is part of our mission to become the world's most trusted IT service partner. The Board of Directors is fully committed to this Code of Conduct and expects all those who work with Proact to follow it.

For and on behalf of the Board of Directors:

Anna Söderblom
Chair of the Board

4th May 2023

Overview

This Code of Conduct sets out the fundamental principles of ethical behaviour expected of all those who work with Proact. More details on these principles and how they are applied are found in the Proact Company Handbook as well as in Group policies and the policies of our subsidiary companies.

1. Compliance with the law

We will endeavour to understand our legal and regulatory obligations and we will follow all laws and regulations that apply to us.

2. Respect in our interactions with others

We represent Proact in every business interaction with customers, fellow workers, or third parties with the power to influence others' opinions and attitudes about the company. We will be polite and treat others with respect and professionalism in all business interactions. We will deal with others fairly, honestly, and openly. We will not tolerate any form of bullying or harassment toward Proact workers or by any Proact worker toward any third party.

3. Protecting company funds and keeping accurate records

We are responsible for the safekeeping of company revenues, accounts and associated records and materials. We will be careful regarding costs and will keep records of any expenses that we later wish Proact to pay for. We will maintain accounting and systems procedures that always enable us and other relevant parties to obtain a true and fair view of our accounts. We will keep accurate and detailed business records of all transactions.

4. Confidentiality and intellectual property

We will protect confidential information and trade secrets in our possession from unauthorised use or spreading to others, whether such information belongs to Proact or to our customers, contractors, suppliers or other third parties with whom we have a business relationship. We will respect intellectual property rights of third parties and obligations of confidentiality we may owe to them and will not knowingly violate such rights or try to persuade others to do so.

5. Social and environmental responsibility

We will always operate in accordance with relevant health, safety and environmental laws and industry standards, including laws and industry standards on working hours and working conditions regarding our own employees. We will take reasonable steps to ensure that our suppliers also follow these laws and standards. We will not tolerate any form of modern slavery, human trafficking or human rights abuses within our business or our supply chain.

We will always try to use limited resources and increase energy efficiency to prevent or minimise any harmful effects of our operations on the environment. This includes promoting systems for recycling and recovery of materials and working to prevent pollution and work-related illness and injury. We shall follow all laws and regulations relating to the disposal of electrical and electronic equipment.

6. Following securities market rules

Proact IT Group AB is a public listed company. We will follow all securities laws and regulations that apply to us, the Nasdaq Stockholm listing rules and the Swedish Corporate Governance Code.

7. No anti-competitive behaviour

We will compete strongly within our markets, but always fairly and ethically and will not participate in any form of anti-competitive behaviour such as bid-rigging, price-fixing or illegally cooperating with competitors or suppliers.

8. Following export controls and sanctions

Proact operates worldwide and frequently exports equipment and software. We will follow all export controls, in particular those relating to encryption technology. We will not export to countries or entities that are subject to sanctions by the UN, EU or applicable national law.

9. Bribery, corruption and conflicts of interest

We will follow all laws relating to bribery and corruption and will not tolerate bribery or corruption of any kind. We will not offer, promise or give any advantage to any person with the intention of encouraging them to act improperly or as a reward for doing so. We will not request or accept any advantage from any person that is intended to encourage us to act improperly or in circumstances in which it could be perceived to have that effect. We will not pay 'facilitation' payments to public officials in any country. We will ensure that we comply with our duty to place our responsibilities to Proact above our personal gain. This includes avoiding situations in business relationships and in personal or community activities that create, or may create, a conflict of interest between our personal interests and those of Proact.

10. Discrimination and equal opportunities

We will recognise and respect each person in the workplace as an individual and will not tolerate any form of discrimination. We will make all employment decisions – including decisions about who to recruit, hire, train and promote – based only on valid job requirements and objective assessments of suitability without considering a person's sex, race, colour, religion, age, disability, national origin, sexual orientation or any other characteristics protected by law.

11. Use of IT systems

We will use Proact IT systems and third-party IT systems responsibly for the business purposes for which access is given, in a manner that preserves the integrity and security of the systems, promotes efficiency, enhances Proact's public image and respects other Proact employees and third parties.

12. Data protection

We will follow all data protection laws affecting the acquisition, maintenance and use of personal data. Where we have access to personal data we shall: only use it for the purpose for which it was collected or for uses that are permitted by law; uphold the rights of data subjects; take appropriate security measures to protect the confidentiality of the information from unauthorised access or use; and will not keep the data longer than is necessary or permitted by law.

13. Reporting concerns and protection of whistleblowers

Breaches of, or concerns about, this Code of Conduct may be reported to the compliance team in the manner specified in the Company Handbook, and/or to the Chair of the Board of Directors at chairoftheboard@proact.eu. We will investigate all such reports and concerns thoroughly, promptly, and in accordance with applicable laws. We will protect any individual who reports concerns in good faith from any retaliation by any other individual.