PROACT

Modern Slavery Statement

PROACT

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.

Proact has a zero-tolerance approach to modern slavery within our operations and is committed to improving our 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 2025 to 31 December 2025.

Our business

Proact is one of Europe's leading specialists in hybrid cloud and IT solutions. We offer infrastructure, IT services and technical solutions that help organisations manage their business and society critical data securely, cost-effectively and sustainably. With over 30 years' experience, we combine technical expertise with a local presence, making us a reliable partner for customers with high standards.

Proact IT Group has over 1,100 employees and operates in 12 countries, mainly in Northern Europe.

Founded in 1994, our parent company, Proact IT Group AB (publ), was listed on Nasdaq Stockholm in 1999 (under the symbol PACT).

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

In 2025, the Group had a total revenue of SEK 4,679 million.

Read more in Proact's Annual and Sustainability Report at www.proact.eu.

Our supply chains

Proact has 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/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. However, as a customer, we play an important role. We have adopted processes to clearly communicate our expectations to our suppliers during our onboarding process, and we ensure all our personnel have an awareness of the importance of due diligence by delivering training sessions.

PROACT

Our policies

Proact is committed to respecting and promoting human rights and labour rights throughout our operations. We have a Group-wide Code of Conduct and a number of governing policies that apply to all employees, suppliers and business partners within the Group, These policies ensure compliance with international frameworks such as the UN Universal Declaration of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and build on international guidelines such as the OECD Guidelines for Multinational Enterprises, the UN Global Compact and the UN Guiding Principles on Business and Human Rights. The policy framework is complemented by local guidelines and handbooks that ensure that the operations fulfil national requirements and are adapted to local conditions.

Code of Conduct

Proact's Code of Conduct 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 process, which enables 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 process is designed to make it easy for individuals to raise concerns, without fear of retaliation or negative treatment. All reports will be investigated, and where appropriate, remedial actions taken.

Sustainability Policy

The Sustainability Policy covers human rights, working conditions and ethical matters, such as human trafficking, forced labour and child labour. We will ensure there is transparency within our business and that our approach to tackling modern slavery is consistent with applicable legislation and ethical standards. We expect the same high standards from all of our suppliers and other business partners. We will ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains.

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 our Code of Conduct and improve their worker's working conditions where needed. However, serious violations of our Code of Conduct may lead to the termination of the business relationship.

Sustainability due diligence process

We are committed to monitoring areas of potential adverse impact in our supply chains. As part of our initiative to identify and address potential and actual adverse human rights and environmental impacts in our own operations and in our value chain, we have a sustainability due diligence process in place. Before contracting with new suppliers, customers or potential acquisitions, the target is subject to the sustainability due diligence process to assess any potential risks or adverse impacts of engaging with them. The sustainability due diligence process forms part of our vendor and customer onboarding processes and follows the principles in the UN Guiding Principles on Business and Human Rights and OECD's Guidelines for Multinational Enterprises on Responsible Business Conduct.

Due diligence is carried out through questionnaires, online research, regular meetings and audits. The process is continuous and includes the following steps:

- Identify targets and assess impact
- Remediate or terminate adverse impacts as appropriate
- Monitor and review regularly
- Report on sustainability impacts

Assessment and handling of impacts

Actual and potential impacts are evaluated according to Proact's double materiality assessment (DMA). This ensures that impacts are evaluated harmoniously and consistently over time and regardless of origin. All impacts and measures to mitigate them are regularly assessed.

Based on the findings in the first step of the sustainability due diligence process, each target will be given an impact score according to Proact's DMA. Impacts are systematically analysed, prioritizing areas with heightened vulnerability to issues like labour exploitation, discrimination, and unsafe environments. The assessments prioritise high-risk areas based on geography and industry as well as significance of the business for Proact.

Detected impacts are reviewed against a list of red flags and Proact's playbook. Any remediation actions that are required to treat the adverse impact are documented and scheduled.

Findings

No actual adverse human rights impacts linked to our operations via the value chain have been identified during our sustainability due diligence process.

Anti-modern slavery initiatives

To ensure our supply chain complies with the same values as Proact in respect of transparency and modern slavery, we have in place policies, processes, risk assessments, investigations, contractual controls and training. 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 in order to mitigate the probability of slavery and human trafficking occurring in our supply chains.

We have a dedicated sustainability due diligence team, which consists of representatives from the following functions:

- Legal
- Sustainability
- 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 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 Code of Conduct, and compliance with laws, including those on transparency and modern slavery.

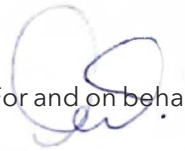
All personnel are encouraged to notify Proact immediately if they become aware of any modern slavery within Proact's supply chains.

Review and assessment

Proact monitors the effectiveness of our policies and actions through a combination of performance indicators, assessments and target follow up that are integrated into the company's governance and operational processes. These reflect corporate culture (employee satisfaction), compliance (completion rate of mandatory training) and ethical conduct (number of whistleblower reports and legal cases). Follow-up takes place at least annually, in certain cases more often, and is managed by the Legal & Compliance and HR teams. We also conduct audits, risk assessments and checks when onboarding suppliers to ensure compliance with Proact's Code of Conduct and other relevant policies. The results are analysed on an ongoing basis and reported to management to ensure that any deviations are dealt with promptly.

We undertake internal compliance audits to ensure adherence with applicable laws and regulatory controls, including those of transparency and modern slavery.

Over the next financial year, we will continue to 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.



For and on behalf of the Board of Directors:

Anna Söderblom

Chair of the Board

Date: 4 May 2026