

Statutory report on

Corporate Social Responsibility

ProData Consult's approach to sustainability

ProData Consult's long-term business plan includes integrating sustainable business practices throughout the value chain. This by mitigating sustainability risks, grasping opportunities and by steadily improving sound governance, compliance, processes, tools and organization.

In 2018, ProData Consult took the first steps implementing the UN and OECD guidelines in corporation with external CSR consultants.

In 2019, ProData Consult formalized the governance around our future sustainability work. The Group COO chaired the sustainability steering group. The steering group advises the executive management and board in future sustainability plans. First initiative was to update ProData Consult's CSR strategy (including its CSR commitment). This was approved by executive management and the board. In 2020, this plan was revisited, and the internal Code of Conduct was updated and approved by the executive management and board.

The first risk analysis was done in 2019/20. The purpose was to create an overview and action

plan to mitigate or remove risks – and equally important; to create business opportunities. By creating a risk overview, we can mitigate severe breaches against international conventions that could lead to loss of employees (stress, sickness e.g.), customer churn, contractual sanctions e.g.

The company was evaluated in three sustainability areas: Environmental, Social/Ethical and Anti-Corruption (Economic). Before the evaluation ProData Consult had already defined some actions to remove or mitigate risks. Nonetheless, the risk analysis generated an increased focus on intensifying our sustainability effort to meet our sustainability responsibilities.

The Sustainability Plan for 2021 will improve our operations. ProData Consult will work on incorporating GRI standards in the sustainability reporting. ProData Consult recognizes that stakeholders expect business conduct to impact society in positive way. The Company believes that sustainability is a competitive advantage for ProData Consult.

Sustainability Overview

	SOCIAL IMPACT	ECONOMIC IMPACT	ENVIRONMENTAL IMPACT
Sustainability areas	1 Social influence		
	2 Sustainable supply chain		
	3 Information security and data privacy		
	4 Greenhouse gas emissions		
	5 Employee experience		6 Equal opportunities
	7 Financial performance		
	8 Consultant experience		9 Customer experience
	Policies	CODE OF CONDUCT POLICY	
Code of Conduct (1), Our Commitment (1), Internal audit policy (1), Anti-corruption Policy (1), Competition compliance rule (1), Procurement Policy (2), Supplier Code of Conduct Policy (2,4), Environmental Policy (2,4), IT Policy (3), Data transfer Policy (3), Information Security Breach Procedure (3), Privacy Policy (3), Occupational Health and Safety Policy (5), HR Policy (5,6), Finance Accounting Manual (7), KYC Policy (to be implemented) (7), Quality Policy (8,9)			
Due diligence processes	Internal and external audits (1), Governance, risk and compliance management (1,3), Environmental management process (EMS) ISO14001 (2,4,5), ISO9001 (7,8,9), ISAE3402 audits in Nearshore Center (3), Information and cyber security audits and assessments (ISAE 3000) (3), HR processes (5,6), Employee survey (5,6), EDGE equality certification to be implemented (6), Financial processes (7), Customer Satisfaction (8,9)		
	SUSTAINABILITY PROCESS, SUSTAINABILITY PLAN 2021-2022		
	WHISTLEBLOWING ON CODE OF CONDUCT ISSUES		

Policies and guidelines

Group Code of Conduct is aligned with international frameworks and norms, as well as local legislations. It outlines the ethical principles, which applies to all employees as well as any third-party contributing to our services, products or other business activities.

In late 2020, The Company implemented a separate Supplier Code of Conduct Policy clarifying the ethical guidelines applying to ProData Consult's suppliers. During 2021, these rules will be implemented in all new contracts with regular suppliers.

Group Anti-Corruption Policy provides practical guidelines on how to evaluate and avoid unethical behavior. Additionally, all employees are expected to adhere to our Competition Law Compliance Policy. We also have an Environmental Policy which outlines our precautionary approach to environmental management within the company and throughout the value chain. This rule is compliant with ISO 14001 requirements. In addition, other policies and rules supporting the management of specific sustainability areas have been implemented. All policies and rules as well as processes covering sustainability apply to our entire organization. Policies and rules are reviewed on an annual basis, as part of our compliance program.

Implementing sustainability in daily business operations

To support the organization in further implementing sustainability in daily business operations, a Sustainability Management System was introduced in 2020. The system (and processes) utilizes best practices from the United Nations Global Compact Management Model and GRI Standards.

Group Code of Conduct further supports the implementation of sustainable and ethical business practices across the entire organization.

Mandatory trainings for all employees also cover e-learnings in GDPR, as well as a general security training. As sustainability concerns the whole company encourages employees to discuss and promote the positive sustainability outcomes that digitalization can enable for customers.

The CSR project group meets on a quarterly basis to review and ensure progress. In 2020, more effective communication of CSR has been introduced on ProData Consult's website. A complete sub-website that communicates 'Our Responsibility' – including our "Whistle-blower" solution has been implemented. This will make it easier for customers, consultants, and employees to communicate praise or criticism – or simply good ideas.

ProData Consult is committed to a culture where employees feel safe to speak up and report concerns and adhere to the principle of nonretaliation.

ProData Consult's sustainability plan 2021 captures and details our effort to maximize opportunities (and minimize risks) linked to sustainability in three directions – the environmental impact, the social/ethical impact and the operational impact.

Environmental impact

Climate change is a general issue for all people and should be addressed by all companies. The environmental impact of ProData Consult is mainly in two areas – energy consumption and business travel. We have set up plans in both areas to limit our footprint. And we have for the last three years seen a decrease in CO2 emissions per employee.

The Company has implemented ISO 9001 certified quality management system and ISO 14001 (EMS) in Sweden and will finalize the other countries in Q1 2021 (including parts of ISO 5001: Energy Audit). We have set up plans for implementing renewable energy in all our operations.

ProData Consult is committed to a culture where employees feel safe to speak up and report concerns

We have invested heavily in virtual meeting facilities – and online meetings have been a natural way of working thus limiting traveling – though when traveling is necessary we always try to find the most reliable and sustainable partners.

Social/ethical impact

Setting a good example as a company is a high priority in ProData Consult. We want to make sure that our values are taken seriously – doing right on how we treat people no matter colour, religion, age, ethnicity, or gender. And that these values are the enablers of business success.

ProData Consult has a detailed approach to business ethics. It is all described in Group Code of Conduct and Group Anti-Corruption Policy – and more importantly management is taking a pride in living by the words. The Company believes that living by the example and being transparent and open is fundamental to being a trustworthy partner for customers and consultants.

ProData Consult places a high priority on creating a healthy and attractive physical and psychological working environment that focuses on the well-

being of its employees, including our policies on sickness absenteeism. The Company sickness absenteeism policy covers follow-up on employee workplace attendance and behaviour while also expressing the Company's compassionate interest in employees' well-being. The Company's sickness absence rates decreased from 2019 to 2020.

ProData Consult directly contributes to organisations that advocate and help to protect human rights, for example by making annual donations to Amnesty International and UNICEF. Risks related to violations of human rights are limited due to the Company's business model, policies and presence only in the EU. No violations of human rights were detected in 2020.

ProData Consult has an explicit policy of not doing business with any customers who abuse human rights, and the Company regularly evaluates its clients to identify any possible violations of human rights. The Company expects all our business relationships (clients, suppliers and consultants) to align their operations with the UN's Guiding Principles for Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational

Enterprises (OECD Guidelines) as well. This means clients, suppliers and consultants must pledge to prevent or mitigate adverse impacts on human rights, the environment and business ethics (anti-corruption), and should address any actual adverse impacts that arise. The Company's expectations are further detailed in our Code of Conduct.

Economic impact

The DNA of ProData Consult is creating value for our stakeholders (customers, employees, investors and the general society). This is being done by supplying the best senior business and IT consultants to some of the biggest and most advanced companies in the region: financial institutions, ministries, insurance companies, pharmaceutical companies, etc.

A central aspect of the company promise is to have sustainable business conduct in the core of all processes and be open and transparent about performance through the value chain. The Company puts a great effort into documenting, auditing and measuring The Company's value chain. ProData Consult has an advanced digital platform and offer customers, employees and consultants full insight into the processing of their data. In 2019, this platform and supporting processes passed an ISAE 3000 GDPR audit. In 2020, we implemented a full ISMS platform to support registered individuals' privacy rights.

At the same time, an ISAE 3402 declaration for all nearshore services were implemented. Late 2020 the Company started implementing both ISO 9001 and 14001 as well as parts of ISO 5001 (will be finalized in Q1 2021) to make sure that all business is conducted with the highest integrity. The annual audits document ProData Consult's commitment to customers, consultants, and employees. The audits also help ProData identify risks that need to be addressed.

By fulfilling our promise - supplying the best senior business and IT consultant resources to private and public organizations we help improve the economic, social and environmental conditions in the markets where we operate. And at the same time, we create value and long-term success for employees, customers and consultants alike – and we will be an important part of progress and prosperity in the markets where we operate.

Sustainability Reporting

ProData Consult Sustainability Reporting has increased in volume and in stakeholder relevance in the last few years. This tendency will continue in 2021. New and ambitious plans will bring ProData sustainability to an even higher level. The Company will focus even more incorporating GRI standards in our Sustainability Reporting. As well as increase collaboration and partnerships with external stakeholders – investors, customers, suppliers and more.



The Company has
been a member of the
UN Global Compact
initiative since 2014.

ESG KEY FIGURES

	Unit	2021 (targets)	2020	2019	2018
ENVIRONMENT					
CO2e, scope 1+2	Tons	390.0	391.5	420.0	376.0
CO2e, scope 1+2+3	Tons	900.0	945,0	1.010,4	N/A
CO2 per sqm.	Tons	0.100	0,106	0,130	N/A
Water consumption	m3	1,600	1,586	2,367	1,915
Water consumption per employee	m3	8,8	10,6	16,8	16,2
Office square meters	m2	9,000.0	8,895.0	7,776.0	5,879.0
GOVERNANCE, RISK AND COMPLIANCE					
Issues (service affected - still running)	Number	3	4	7	8
Disruptions (service down)	Number	1	1	2	7
Downtime in days	Days	0	1.5	2.0	5.5
Professional integrity incidents	Number	0	0	0	0
HUMAN CAPITAL, HEALTH AND WELL-BEING					
Number of employees	FTE	183	150	141	118
Employee turnover	%	8.2%	20.7%	17.7%	N/A
Employees who have left ProData Consult	FTE	15	31	25	30
– Voluntary resignation	FTE	8	11	14	-
– Redundancy	FTE	6	17	8	-
– Retirement	FTE	1	1	3	-
Recruited employees	FTE	48	40	48	33
Work related accidents	Number	0	0	0	0
Sickness ratio	%/FTE	2.5%	2.9%	4.2%	2.9%
Employee satisfaction	%	80.0%	77.4%	79.8%	-
Gender split (female)	%	50.0%	59.5%	56.8%	52%
Average age	Years	38	37	38	40
Average seniority	Years	4.5	4.4	4.3	4.5
Nationality - Danish	Number	60	53	59	59
Nationality – non-Danish	Number	123	97	82	58
Nationality – non-Danish	%	67.4%	64.7%	58.2%	49.2%

ESG KEY FIGURES

Unit	Unit	2021 (targets)	2020	2019	2018
CUSTOMERS					
Number of customers	Number	360	333	245	250
Customer satisfaction	%	81.0%	80.6%	81.7%	81.1%
MIDDLE MANAGEMENT					
Members	Number	25	23	19	13
Female	Number	12	11	7	4
Male	Number	13	12	12	9
Gender split (female)	%	50.0%	47.8%	36.8%	30.8%
Average age	Years	44	44	39	41
Average seniority	Years	5.0	5.5	3.3	3.3
Nationality - Danish	Number	10	10	10	4
Nationality – non-Danish	Number	15	13	9	7
GROUP EXECUTIVE MANAGEMENT					
Members	Number	10	10	6	5
Female	Number	2	2	0	0
Male	Number	8	8	8	5
Gender split (female)	%	20.0%	20.0%	0.0%	0.0%
Average age	Years	50.0	48.0	49.7	48.0
Average seniority	Years	7.5	7.5	8.2	8.7
Nationality - Danish	Number	5	5	5	4
Nationality – non-Danish	Number	5	5	1	1
BOARD OF DIRECTORS					
Members	Number	5	6	6	0
Female	Number	2	2	2	2
Male	Number	3	4	4	4
Gender split (female)	%	40.0%	33.3%	33.3%	0.0%
Average age	Years	53	53	52	52
Average seniority	Years	4.0	3.2	2.2	2.1
Nationality - Danish	Number	4	4	4	3
Nationality – non-Danish	Number	1	2	2	1
Board meetings	Number	6	6	6	5
Attendance	%	100%	97%	100%	100%

ESG DATA, DEFINITIONS**ENVIRONMENTAL DATA**

CO2e, Scope 2	Yearly sum of kWh from electricity and district heating/cooling per country, multiplied by a CO2 conversion factor per country.
CO2e per m2	Average sum of square meters per year divided by total CO2 emissions per year.
Water consumption	Gross sum of all water consumed.
Water consumption per m2	Average sum of square meters per year divided by water consumption per year.

GOVERNANCE, RISK AND COMPLIANCE

Issues (service affected - still running)	Total number of performance issues per year
# Disruptions	Total number of service disruptions per year
# Downtime in days	Total number of customer downtime days per year.
Professional integrity incidents	Total number of Whistle-blowers (internal and externals) and in note total amount of monetary losses per year

HUMAN CAPITAL, HEALTH AND WELL-BEING

Number of employees	Sum of FTEs year end excluding pregnancy and maternity leave.
Members	Sum of FTEs year end with a position in middle or executive management.
Female	Sum of female FTEs year end.
Male	Sum of male FTEs year end.
Employee turnover	Sum of employees leaving ProData Consult yearly divided by the average number of employees in a year.
Employees who have left ProData Consult	Sum of employees leaving ProData Consult yearly categorised into voluntary resignation, redundancy, mutual agreement and retirement.
Recruited employees	Sum of employees recruited per year.
Work-related accidents	Sum of work-related accidents per year.
Sickness ratio	Sum of yearly absence days for all FTEs divided by the sum of maximum working days per FTE.
Employee satisfaction	Net promoter score from ProData Consult's well-being survey year end.
Gender split (female)	Female FTEs year end divided by total FTEs year end.
Average age	Sum of age per employee year end divided by sum of employee's year end.

Average seniority	Sum of years employees (working for ProData Consult year-end) have worked for The Company year-end divided by the sum of employee's year end.
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Nationality - Danish	Sum of FTEs with Danish nationality year end.
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Nationality - non-Danish	Sum of FTEs with non-Danish nationality year end.
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CUSTOMERS

Number of customers	Sum of individual customers invoiced per year.
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Customer satisfaction	Weighted average of client satisfaction survey scores from all countries per year scored 1-5. 1 (20%) = poor, 2 (40%) =barely acceptable, 3 (60%) = satisfactory, 4 (80%) = very good, 5: (100%) = outstanding
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GOVERNANCE DATA

Members of the board	Sum of board members year end.
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Female members of the board	Sum of female board members year end.
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Male members of the board	Sum of male board members year end.
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Gender split (board members)	Female board members year end divided by male board members year end.
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Average age (board members)	Sum of age per board member year end divided by sum of board members year end.
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Average seniority (board members)	Sum of years board members (year-end) have been a member of the board year end divided by the sum of board members year end.
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Nationality – Danish (board members)	Sum of board members with Danish nationality year end.
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Nationality - non-Danish (board members)	Sum of board members with non-Danish nationality year end.
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Board meetings	Sum of board meetings per year.
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Attendance	Sum of board meetings that all board members have attended per year divided by sum of maximum board meetings that all board members could have attended per year.
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