



COMMUNICATION ON PROGRESS



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EXECUTIVE SUMMARY

ProData continued its remarkable expansion in 2019. We have grown significantly – through both M&A and organically. But at the same time, we have succeeded in maintaining and intensifying our focus on responsible business conduct and sustainable development despite the rapidity and scale of our growth.

In this Communication on Progress (CoP) report, ProData Consult describes how we approach our responsibility for sustainable development operationally. We describe our policy commitment, procedures, the specific risks we have identified as particularly central, and how we work to prevent such risks from becoming actual impacts.

We also describe our strategic sustainability efforts, our results so far, and our goals for the coming years.

In the first section of the report, ProData Consult presents how our business has developed over the last year, and how we work with sustainability. Our responsibility framework is based on the UN Global Compact, as implemented through the UN Guiding Principles for Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises (OECD). We present ProData Consult's Policy for Corporate Social Responsibility and describe ProData Consult's due diligence work in alignment with the global minimum standard, UNGPs/OECD.

We then go on to describe our processes for access to remedy and how we engage with business relationships. In the section on due diligence, we outline our progress in establishing and conducting regular impact assessments on social, environmental, and economic sustainability. We describe our work in two areas in detail: first, in regard to the right to non-discrimination (freedom

from discrimination on the basis of gender, nationality, etc.), including the gender balance on the board and in management (which also serves to fulfill the requirements of the Danish Annual Accounts Act Section 99b). And second, we outline our efforts in regard to the right to privacy – because handling sensitive data is the core of our business.

In the second section of this report, we present our Key Performance Indicators (KPIs). Our KPIs assist us in measuring our progress in implementing the management system developed by the UNGPs/ OECD. We also measure our progress on selected concrete actions derived from the action plans established in connection with our regular impact assessments.

In the final section of the report, we present how we work to contribute to sustainable development.

This section outlines how our CSR efforts to promote social, economic, and environmental sustainability contribute to the fulfillment of several of the UN Sustainable Development Goals (SDGs).

We are proud to present this report on our progress. Even though we have had our hands full with expansions which have led to new operations and changes to our existing operations, we have managed to maintain and build our business around our commitment to a sustainable future.

Our achievements in this area are the result of our collective efforts and careful attention to our responsibility. We are grateful to have the privilege of working with colleagues who do their utmost to improve our business responsibly, every single day.

We also describe our strategic sustainability efforts, our results so far, and our goals for the coming years.

SUSTAINABLE DEVELOPMENT – OUR RESPONSIBILITY

We are pleased to confirm that ProData Consult A/S reaffirms its support of the ten principles of the United Nations Global Compact in the areas of human rights, including the core labor rights, environment, and anticorruption. We continue to support the UN Global Compact, as we are also aware of the member states' commitment to the UN Global Goals for Sustainable Development.

As one of the largest suppliers of senior business, management and IT consultants in the region, ProData Consult is committed to assisting customers (in all industries) scale up with the exact expert resources needed at the exact time and on the exact location. While running a company with continuous financial growth, ProData Consult is committed to acting responsibly to promote social, environmental, and economic sustainability.

We respect the rule of law and comply with national regulations in all countries in which we operate, and expect the same of all our employees and business relationships.

In addition, and as distinct from legal compliance, we have committed to conducting regular impact assessments to identify actual and potential adverse impacts in our business practices and severe impacts on our value chains. As part of this work, we will also address risks related to changes in our product range, operating contexts, and when engaging in new business relationships. We will communicate the findings of our assessments to relevant stakeholders. We expect that our regular assessments and transparent communication will help anchor our commitment throughout our company.

Should we, despite our efforts to prevent or mitigate, cause or contribute to actual adverse impacts, we commit to providing access to remedy or to contact the appropriate authorities as necessary.

THE TRIPLE BOTTOM LINES

Our responsibility framework comes from the UN Global Compact, implemented through the UN Guiding Principles for Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises (OECD).

We comply with national legislation – no matter where we operate. And in addition, we will identify, prevent and mitigate adverse impacts on the guiding lines on human rights, environment and business ethics (anti-corruption). And we will communicate how we handle these impacts.

We will handle the potential and actual adverse impacts that we cause, contribute to, or are associated with through our business relations (vendors).

EXPECTATIONS OF EMPLOYEES AND BUSINESS RELATIONSHIPS

Our employees are key partners in helping us respect the international principles for sustainable development. All ProData Consult team members are expected to assist us in honoring our commitment. We encourage our team members to alert management of any actual or potential adverse impacts that ProData Consult may cause or contribute to; or in the event that it comes to their attention that we are associated with severe impacts.

We expect all of our business relationships (customers, suppliers, and consultants) to align their operations with the UN Guiding Principles for Business and Human Rights

(UNGPs) and the OECD Guidelines for Multinational Enterprises (OECD) as well. This means they must commit to preventing or mitigating adverse impacts on human rights, the environment, and business ethics (anti-corruption), and should address any actual adverse impacts that arise. Our expectations are further detailed in our Code of Conduct for Business Relationships.

Global Compact principles as made operational by UNGPs/OECD.

This commitment has been developed and approved by the board. It has been integrated into our strategy, business operations, and policies.

In addition to managing our adverse impacts, we aim to make a difference for diversity (assisted

by our non-tolerance for discrimination); to demonstrate excellence in managing the right to privacy and freedom of information; and to support environmentally sustainable practices;

among other ways by using environmentally friendly services, solutions, and technologies.

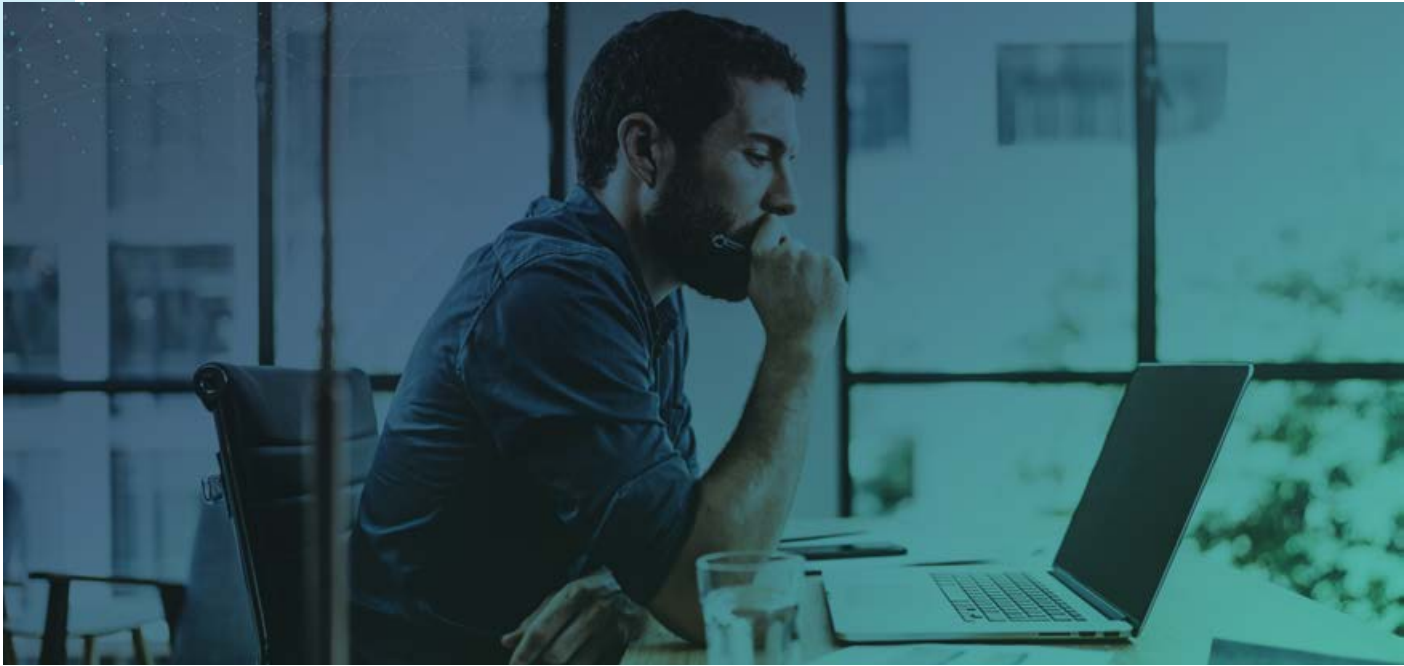
From our impact assessments, we have identified more than 100 actions that we will focus on in 2020. We will follow up on our progress every quarter. In this annual communication on progress, we describe

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THE SCOPE OF OUR COMMITMENT

Our commitment is founded on respect for internationally recognized principles for sustainable development; human rights (including labor rights), the environment and business ethics, as per the UN



our actions to continually improve the integration of the UNGPs/OECD guidelines, applying the UN Global Compact principles to our business strategy, culture, and daily operations. We also commit to sharing this information with our employees, customers, suppliers, and other stakeholders through our primary channels of communication.

DUE DILIGENCE (ADVERSE IMPACT ANALYSIS)

In 2018, ProData Consult took the first steps towards implementing the UN and OECD guidelines. We have worked with external consultants, and the first adverse impacts analysis was done in 2019. The analysis, which primarily covers our Danish

operation, identified adverse impact risks: 19 out of 58 in regard to human rights principles, 2 out of 21 in regard to environmental sustainability, and 4 out of 13 in regard to economic sustainability. In most areas, ProData Consult had already defined actions aimed at either removing or mitigating these risks. Nonetheless, the analysis generated an increased focus on intensifying our efforts to meet our responsibility in regard to sustainability.

In 2019, ProData Consult introduced its CSR process in compliance with the guidelines. In 2020, we will begin following up on our adverse impact analysis annually: monitoring our progress, setting new

targets, and starting to include our smaller markets. We will also monitor whether new adverse impacts have arisen. In 2020, we will introduce a new CSR management system in order to ensure documentation of our progress. The CSR project group will meet on a quarterly basis to review and ensure progress. In 2020, we will also implement more effective communication of CSR on our website: we will create a complete subsite that communicates 'Our Responsibility'. This will also make it easier for clients, consultants, or employees to communicate praise or criticism – or simply good ideas.

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SUSTAINABLE DEVELOPMENT – HUMAN RIGHTS PRINCIPLES

Responsible business conduct and sustainability lie at the core of our strategy and activities. In order to ensure compliance with the UNGPs/OECD guidelines, we perform an adverse impact analysis for all 48 human rights for all countries in which we operate. The actual risk levels are described, in addition to planned or already executed preventive/mitigative actions. Employees, customers or vendors, who might experience impacts will be informed about our actions and progress through our intranet, policies/handbooks, our website, or other public communication.

In 2019 we analyzed ProData Consult for the first time. We had negative impacts in 19 areas and non in 29 areas.

Our indicators show that we are generally handling these risks well.

We have a special focus on the right to privacy. How we handle this is described below.

THE RIGHT TO PRIVACY

The DNA of ProData Consult is supplying the best senior business, management and IT consultants to some of the biggest and most advanced companies in the region: financial institutions, insurance companies, pharmaceutical companies, etc. A central aspect of this work involves processing sensitive data – on the consultant, client, and employee side.

Since 2007, ProData has prioritized the individual's right to privacy, by supporting all privacy perspectives with an advanced digital platform

and offering individuals full insight into the processing of personal data and controls. In 2019, this platform and supporting processes passed a ISAE 3000 GDPR audit, and will be continue to be audited on a annually. Also in 2019, we set ambitious targets for 2020: implementing a full ISMS platform in support of registered individuals' right to privacy, passing the annual ISAE 3000 GDPR audit, and introducing an ISAE 3402 declaration for our nearshore services.

It is of great importance to ProData that all business is conducted with the highest integrity, and the annual audits document this commitment to customers, consultants, and employees. The audits also help ProData identify risks that need to be addressed and areas for improvement.

The right to non-discrimination (Review of gender split - the Financial Statement Act, Section 99)

ProData Consult has worked hard to improve operations and policy in the area of 'the right to non-discrimination'. Firstly, we have worked to increase female representation, and secondly, we have worked to by increase non-Danish representation at all management levels. Efforts in both areas have been made as part of our social sustainability responsibility. We believe that our company should reflect the society we are part of. And we have made good progress in recent years - at all levels of the company.

In 2018, we started an active search for female and non-Danish board representatives. And in 2019, we hired our first two female board members - thus reaching our target of 33% female board representation. At the

same time, we reached 33% representation of non-Danish board members. At CXO level, we do not have any female or non-Danish representation. For this reason, we have set a target for 2020 of bringing one new female CXO member on board, and of getting at least two non-Danish CXO members during the same period.

At middle management level, the target was to reach an equal split between men and women. And in 2019, we had more female than male middle managers for the first time in ProData Consult history. In 2020, we will strive for a 50/50 split. Non-Danish representation at management level increased as well, both in 2018 and 2019. Now the majority of managers are non-Danish. We plan to continue this trend in 2020.

Across the company as a whole, we also have an equal gender split, and

have increased female representation from 52% to 57%. In 2020 we will strive for a 50/50 split.

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ENVIRONMENTAL SUSTAINABILITY

ProData Consult has a balanced focus on environmental sustainability. The adverse impact analysis has shown that we do not have greater risks in this area. However, the adverse impact analysis did identify possible adverse impacts in 2 out of 21 areas (air emissions and energy consumption). In response, we have decided to focus on improvements in these two areas.

Below we present examples of what we are doing and planning to do in these two areas.

AIR EMISSIONS – NEGATIVE IMPACTS

Due to our business model, we have offices and employees in 11 different locations throughout Northern Europe. The adverse impact associated with this business model is, of course, the necessity of travelling (flying) between the offices. Although air travel is necessary for the company because of the importance of visiting ‘the place where value is created’ (Gemba), we need to review our practices and debate our priorities in light of the need to reduce emissions.

ACTIONS TO PREVENT OR MITIGATE

Selected actions:

1. ‘Tone from the top’ – communication from management.
2. Introduction of video conference equipment at selected destinations.
3. Introduction of communication technologies to enable online meetings.
4. Introduction of virtual meetings for all (or selected) employees.
5. Introduction of measurement of Scope 1 and 2 CO2 emissions.

We will follow up on measuring impact both on CO2 emissions and financials.

ENERGY CONSUMPTION

ProData Consult does not use a lot of energy. Although we operate office buildings for our customers (nearshoring), ProData Consult does not store or process huge amounts of data at our own facilities. However, this may be the case for some of our business relationships that run data storage.

ACTIONS TO PREVENT OR MITIGATE

Selected actions:

1. ‘Tone from the top’ – communication from management about the importance of energy efficiency.
2. Introduction of automatic lighting in all office buildings.
3. New Code of Conduct for business relationships to encourage responsible behavior and to motivate our clients to optimize their energy consumption. We comply with national legislation – no matter where we operate. And in addition, we will identify, prevent and mitigate adverse impacts on the guiding lines on human rights, environment and business ethics (anti-corruption). And we will communicate how we handle these impacts.



ECONOMIC SUSTAINABILITY - ANTI-CORRUPTION PRINCIPLES

ProData Consult does not use unethical business practices. In 2019, several measures were implemented to ensure and continue our good practices in this area. We have identified risks of adverse impacts in 5 out of 13 areas in the guidelines:

1. Bribes to or corruption of public officials
2. Bribes to or corruption of private counterparts
3. Cronyism and nepotism
4. Offering or accepting gifts beyond stated value (approvals)
5. Clearly define job duties based on skills, qualifications, and experience

In 2019, ProData Consult made implementing an updated version of the Anti-Corruption and Bribery Policy and the Whistleblower Policy a high priority. In the new and updated policies, we state the company's policy on unethical economic behavior. We also present policies on bribery, nepotism, anticompetitive behavior, anti-trust, and tax evasion. We have also initiated an optimization of controls and procedures in regard to ensuring full transparency in all our transactions and use of third party.

ACTIONS TO PREVENT OR MITIGATE

Selected actions:

1. Develop and introduce a gift register as well as guidelines for receiving gifts.
2. Develop and introduce policies that forbid any form of nepotism in relation to employees, suppliers or contractors
3. Introduction of 'Tell Us', an internal and external communication tool to facilitate whistleblowing, criticism, or constructive inputs.
4. Development of a procurement policy, including new procedures for procurement. For example, contracting work with a value of more than 1,000 EUR requires at least two offers to be evaluated.



ACCESS TO AN EFFECTIVE REMEDY

ProData Consult has various channels and procedures both employees and clients can use to report concerns or complaints. Our employees can use HR, the intranet, employee representatives, APV, or employee satisfaction surveys to voice and protect their interests.

We form trusting relationships with our clients, and we have a culture that values and nurtures open and honest dialogue. Our client module also enables clients to chat directly with us to provide feedback and to nurture dialogue. Our customer Q&A system also ensures high delivery quality. Our response rate is +80%, and the average score is 4.22 on a 5-point scale.

Even though we are already doing a lot, in 2020 we will further develop our remedy channels to make it even easier for both clients and employees to tell us if our behavior is sustainable. One initiative will be the introduction of a new 'Tell Us' communication tool on our website. We want to ensure that all of our stakeholders can inspire us.

KEY PERFORMANCE INDICATORS

In late 2018, ProData Consult took the first steps towards implementing the UN and OECD Guidelines. We have worked with external experts on this process, and completed the first adverse impacts analysis in late 2019. At this time, we also started planning actions and processes for 2020. Overall, we are planning the following follow-up actions (KPIs):

- 1. Follow-up on due diligence 2019**
Our first due diligence (adverse impact analysis) was completed in December 2019. At the same time, ProData Consult performed a KPI overview that presented company performance data (including targets for 2020). In early 2021, we will perform follow-up on due diligence as well as on our KPI targets.
- 2. New due diligence 2020**
We have decided to revisit our due diligence annually – both to measure progress and to identify any new issues that might have arisen. The primary focus of the first due diligence was HQ and the Danish business. We expect to expand the scope of the analysis to our nearshore destination in Poland.
- 3. Management system**
In 2020, we have introduced a new management system to ensure progress at the right time. This system needs to be built into the annual compliance wheel, in accordance with our internal standards.
- 4. Revision of Employee Handbook (and intranet)**
ProData Consult has introduced a new intranet. This will soon contain our updated employee handbook. The old version has been updated to ensure compliance with the standard (including an easier way for employees to communicate with HR and the company in general).
- 5. Revision of Employee Satisfaction Survey and APV**
We will make some minor changes to both the Employee Satisfaction Survey and the workplace evaluation to address some of the risks described in the due diligence. We expect these surveys to be a vital indicator of our progress in regard to sustainability.
- 6. QA system**
We have a well-integrated Q&A system that clients can use to report their evaluation of ProData Consult as well as our product (the consultants). We aim to keep the same high momentum and quality in our QA work. This ensures a quick response to customer complaints. We follow scores very closely; these are reported openly and regularly, both on internal platforms as well as external.
- 7. New 'Tell Us' tool**
During 2020, we will introduce a better communication tool for customers and consultants to tell us where we can improve. This will be a good indication of the quality of our sustainability work.
- 8. Introduction of Code of Conduct for business relationships**
In 2020, we will introduce our Code of Conduct for Business Relationships.

UN'S SUSTAINABLE DEVELOPMENT GOALS

In 2015, the UN's 17 Sustainable Development Goals for sustainable development were approved. They define the priorities and targets of the world society for the period 2015-2030. These targets are ambitious, and cannot be achieved without the active involve and support of business and industry.

SUSTAINABLE DEVELOPMENT GOALS



In connection with ProData Consult's implementation of a management system for sustainable business behavior, a variety of activities have been initiated. These activities

do not only contribute to the individual UN development goals. They also contribute to making our business more sustainable in a more general sense.

As part of our current work on sustainability, we have launched specific ProData Consult initiatives in relation to specific SDGs:

SDGS 3 AND 12

ProData Consult contributes to SDGs 3 and 12 by providing a safe and secure working environment through employee benefit programs. But just as importantly, ProData contributes to these goals through offering training and education, both in specific business skills as well as soft skills.

SDG 8

ProData Consult contributes to SDG 8 by placing a high priority on involving all employees, both in day-to-day operational decisions and through employee surveys and workplace evaluations that evaluate whether ProData Consult safeguards employee rights in accordance with the global standard. We also take pride in growing the company responsibly and sustainably, which also supports SDG 8.

SDGS 5, 10 AND 17

We contribute actively to SDGs 5, 10 and 17 through a strong commitment to the individual's right to non-discrimination.

We work for equal access to promotions, salaries, and the right to education. We have an equal representation of gender at all levels of the company in all countries – an achievement we are proud of! And we have been working hard to achieve an equal representation of nationalities at management level...

SDGS 9, 11 AND 13

As one of the largest suppliers of senior business, management, and IT consultants in Northern Europe, ProData Consult is involved in some of the most innovative projects in the region in regard to SDGs 9, 11 and 13. Here are some examples:

Bank sector: Anti-money laundering initiatives and new and safer payment systems to minimize the possibility of fraud and corruption.

Energy providers and public power suppliers: We directly contribute to and are an instrumental partner in both the development and diffusion of new and innovative technologies

that directly benefit our environment.

Hospital sector:

Instrumental partner in information security projects: securing patient data, optimization of workflows and saving time.

Though some of the SDGs are not mentioned here, this does not mean that they are not important to us. And by virtue of our systematic due diligence practices to handle adverse impacts in relation to social, environmental, and economic sustainability, we engage with all of the SDGs in our operations.

The 17 SDGs are not the only development goals that ProData Consult works with. The SDGs constitute a platform that all countries could agree on towards 2030. Our efforts are also closely related to additional UN and OECD guidelines aimed at ensuring future sustainability.

