



MODERN SLAVERY STATEMENT

NORTAL GROUP

PREPARED FOR:

Nortal Group

DATE PREPARED:

18 August 2023





NORTAL'S GLOBAL BUSINESS

Nortal is a leading digital transformation company that brings together world-class strategic consulting, software engineering, data, and design practices to create a meaningful impact for our customers and shape the future together.

Nortal is the primary architect behind Estonia's transformation into a globally renowned digital society, and the driving force behind hundreds of digital transformation successes for governments, healthcare institutions, and Fortune 500 companies worldwide.

We design and deliver tailored products and platforms with operations in Europe, North America, and the Middle East. We empower organizations to respond to change and accelerate growth by designing proactive services and orchestrated solutions delivered through multi-functional, blended teams.

Our seamless teams envision the future with our clients and are backed by the executional prowess that guarantees speed to value. As long-term impact generators for our clients, employees, and partners, we thrive when it comes to problem-solving at a systems level.

We offer an understanding of local culture and business practices combined with global talent pools and subject matter expertise. Value as a service is our promise as we deliver the future seamlessly across the world.



OUR STANCE ON MODERN SLAVERY



At Nortal, we firmly believe in the dignity and worth of every individual, and we are unequivocally committed to upholding and protecting human rights. We have a zero-tolerance policy towards all forms of modern slavery, including forced labor, child labor, human trafficking, and any form of exploitation that deprives individuals of their freedom and dignity.

We understand that modern slavery is a global issue that requires collective action and vigilance. As a global IT services provider, we recognize our responsibility to ensure that our operations and supply chains are free from modern slavery. We are committed to conducting our business ethically, transparently, and in compliance with all applicable laws and regulations, including the Modern Slavery Act 2015.

We expect the same commitment from our partners, suppliers, and other stakeholders. We have incorporated anti-slavery and human trafficking provisions in our contracts and agreements, and we require all our partners and suppliers to adhere to these provisions. We will not tolerate any form of modern slavery in our business or supply chains, and we will take appropriate action, including terminating relationships, against any partner or supplier found to be involved in such practices.

We also encourage our employees and stakeholders to report any concerns or suspicions related to modern slavery. We have established confidential reporting mechanisms to ensure that such concerns can be reported without fear of retaliation.

We are committed to continuous learning and improvement. We regularly review and update our policies and procedures to ensure their effectiveness in preventing modern slavery. We also provide training and awareness programs to our employees to ensure they understand the risks of modern slavery and are equipped to identify and report potential instances.

At Nortal, we are not just committed to complying with the letter of the law, but also to upholding the spirit of the law. We believe that by standing firm against modern slavery, we can make a meaningful contribution to the global fight against this heinous crime and help create a world where every individual is free and respected.

NORTAL'S SUPPLY CHAIN

Nortal operates within a complex and global supply chain, primarily associated with the provision of IT services and solutions. Our supply chains include a wide range of partners and suppliers, from software providers and hardware manufacturers to professional service firms and independent contractors.

Recognizing the importance of due diligence in our supply chains, we are currently in the process of enhancing our Know Your Supplier (KYS) process. This improved process, which we aim to implement globally by the end of Q1 2024, will introduce specific criteria for assessing our most impactful, or top-tier, suppliers. These criteria will focus on various aspects, including the supplier's financial stability, legal compliance, ethical standards, and commitment to human rights. We will also consider the potential modern slavery risks associated with the supplier's industry, location, and workforce.

For our existing suppliers, we will continue to conduct regular reviews and audits to ensure ongoing compliance with our standards. We maintain open lines of communication with our suppliers to address any concerns and to encourage continuous improvement in their practices.



In cases where we identify potential issues or risks related to modern slavery, we take appropriate action. This may include working with the supplier to improve their practices, reporting the issue to relevant authorities, or, in severe cases, terminating the business relationship.

We are committed to transparency in our supply chains and we will continue to work towards improving our practices, collaborating with our suppliers, and contributing to the global effort to eradicate modern slavery. Our ongoing enhancement of the KYS process is a testament to this commitment, and we look forward to sharing updates on our progress in future statements.

OUR SUPPLIER STANDARDS OF CONDUCT

Nortal's Supplier Code of Conduct is a key document that outlines our expectations for ethical and responsible behavior from all our suppliers. It serves as a guide for our suppliers, helping them understand our values, our commitment to human rights, and our zero-tolerance policy towards modern slavery.

The Code of Conduct covers a range of areas, including but not limited to:

1. Compliance with all applicable laws and regulations, including those related to labor, health and safety, and the environment.
2. Prohibition of any form of forced, bonded, or involuntary labor, child labor, or human trafficking.
3. Respect for the rights of workers, including the right to freedom of association and collective bargaining.
4. Commitment to providing safe and healthy working conditions.
5. Expectation of ethical business practices, including zero tolerance for bribery, corruption, or any form of unfair business practice.

We require all our suppliers to adhere to this Code of Conduct as part of their contractual obligations to Nortal. We believe that by setting clear expectations and standards, we can influence our supply chains positively and contribute to the global fight against modern slavery.

We are currently in the process of reviewing our existing Supplier Code of Conduct. This review is part of our ongoing commitment to ensuring that our policies and procedures remain effective, relevant, and aligned with best practices. We are taking into account the latest developments in legislation, industry standards, and our own business operations.

We plan to publish an updated global Supplier Code of Conduct by the end of 2023. This updated Code will reflect our continued commitment to human rights, ethical business practices, and the eradication of modern slavery. We look forward to sharing this updated Code with our suppliers and stakeholders, and we are confident that it will further strengthen our efforts to ensure responsible and ethical supply chains.

OUR TRAINING ON SLAVERY AND HUMAN TRAFFICKING

At Nortal, we believe that education and awareness are key to preventing modern slavery. We are committed to ensuring that our employees understand the risks associated with modern slavery and are equipped to identify and respond to potential instances in our supply chains.



While we are confident that there is no modern slavery within our own operations, we recognize that the risk can be present in our supply chains. Therefore, we focus our training efforts on raising awareness about modern slavery risks associated with our suppliers and partners.

We are currently in the process of developing resources on modern slavery, which will be made available on Nortal's internal pages. These resources will provide our employees with information about our approach to modern slavery, our expectations from suppliers, and the steps we are taking to prevent modern slavery in our supply chains.

We are also planning to incorporate modern slavery awareness into our existing training programs. This will ensure that our employees, particularly those involved in procurement and supply chain management, are well-equipped to identify and address potential modern slavery risks.

However, we understand that our approach to training may need to evolve as we continue to assess the materiality of modern slavery risks and finalize our Environmental, Social, and Governance (ESG) strategy. We are committed to reviewing and updating our training approach as necessary to ensure it remains effective and relevant.

We believe that by equipping our employees with the knowledge and tools to identify and prevent modern slavery, we can further strengthen our efforts to ensure ethical and responsible supply chains.

COMPANIES COVERED IN THIS REPORT

This Modern Slavery Statement applies to Nortal and all its subsidiaries. While the Modern Slavery Act 2015 requires only businesses operating in the UK to publish a modern slavery statement, we at Nortal believe that the fight against modern slavery is a global responsibility. Therefore, we have chosen to apply the principles of the Act across our entire global operations.

Nortal operates in several countries across Europe, North America, and the Middle East regions. Each of these regions has its unique challenges and contexts when it comes to modern slavery. However, our commitment to preventing modern slavery and human trafficking remains consistent across all our locations.

We believe that modern slavery cannot be tolerated in any location or any form. As such, we are publishing this statement as a global company, with the aim of demonstrating our commitment to eradicating modern slavery not just in the UK, but in every place where we operate.

By extending the principles of the Modern Slavery Act 2015 to our global operations, we aim to ensure that our business practices are consistent, ethical, and respectful of human rights, regardless of geographical location. We also hope to influence our partners, suppliers, and stakeholders around the world to join us in our commitment to preventing modern slavery.

This global approach allows us to maintain a unified stance against modern slavery and ensures that our efforts to combat it are comprehensive, coordinated, and effective across all our operations. We are committed to continuous improvement in this area and will continue to review and update our practices as necessary to ensure they remain effective in preventing modern slavery.



The management board of each of the companies listed below has approved this statement to be signed on their behalf by a director and has confirmed that the information in this statement is accurate as at that date.

Signatures:

Nortal Group Holding OÜ

Andre Krull, member of the Management Board

Nortal AS


Andre Krull, member of the Management Board

Nortal Solutions Ltd.

Andre Krull, Director


pwrteams OÜ

Andre Krull, Member of the Management Board

DocuSigned by:

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Nortal Oy

Harri Vepsäläinen director

DocuSigned by:

52357AED0E9141E...


Nortal AG

Ole Behrens-Carlsson, Member of the Management Board

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Nortal UAB

Mindaugas Taraila, member of the Management Board

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Nortal LLC (Oman)

Taavi Einaste, Manager

Nortal Information Technology Solutions L.L.C.



Taavi Einaste, Managing Director

Nortal (PTY) LTD

Taavi Einaste, Director

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Nortal d.o.o

Milan Simic; Director

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Nortal LLC (USA)

Alain Dias, CEO

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Nortal Solutions FZ-LLC

Hussain Al Balushi, General manager

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Nortal Canada Ltd.

Peeter Smitt, Director

Nortal AS Administrative One Person Company

Peeter Smitt, Manager

Nortal for Business Services LLC

Peeter Smitt, Manager

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Skelia s.a.r.l.,

Karel Saurwalt

Skelia Poland Sp. z.o.o.

Karel Saurwalt, Member of the Management Board

Skelia INC.,

Karel Saurwalt, Member of the Management Board

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Skelia Ukraine LLC

Rostyslav Shchepan, CEO

Skelia Coworking LLC

Rostyslav Shchepan, CEO

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