

# Atos Partners' Commitment to Integrity



**Atos**

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# Introduction

"The purpose of Atos is to help design the future of the information space. Its expertise and services support the development of knowledge, education and research in a multicultural approach and contribute to the development of scientific and technological excellence. Across the world, the Group enables its customers and employees, and members of societies at large to live, work and develop sustainably, in a safe and secure information space."

Atos' purpose (Raison d'être) approved at the  
Atos 2019 Annual General Meeting

Atos' purpose describes how its operations in their entirety contribute to the common interest.

As a global leader in secure and decarbonized digital with a range of market-leading digital solutions along with consultancy services, digital security and decarbonization offerings, Atos strives to conduct its business sustainably, responsibly and ethically.

Atos has a leading position within its sector in all Environment, Social and Governance (ESG) relevant criteria.

Atos has formalized its commitment to integrity, notably through its [Code of Ethics](#), which materializes the requirements in terms of ethical behavior from its employees, and through this Atos Partners' Commitment to Integrity, which sets out the ethical commitment that Atos expects its Partners, as defined below, to take prior to entering in contractual relationship with them.

This Atos Partners' Commitment to Integrity also aims to support Atos commitments to minimize the environmental impact of its activities and its efforts to decarbonize its supply chain in line with Atos Decarbonization commitments to its Science-based targets to curbing global temperature rise to 1.5°C by reducing its total emissions by half until 2025 (near-term target) and to become net-zero at the latest by 2039, following the SBTi new standard criteria. Hence, this charter is also supporting the Group's environmental program and consequently, the environmental management system in place.

More broadly, it is a key part of Atos' Vigilance Plan, which has been developed and is monitored on a continuous basis to identify, prevent and mitigate the risks arising from Atos own activities and supply chain, relating to violations of human rights, health and safety of individuals and the environment.

# Purpose and scope

As Atos Partners play a key role in allowing Atos to deliver services in line with its ethical and sustainable standards, they are expected to commit along with the principles set forth in this Atos Partners' Commitment to Integrity, and acknowledge that such commitment is an essential part of the contractual relationship.

Atos' suppliers further acknowledge that such commitment will be considered for the purpose of the assessment conducted by Atos to monitor Corporate Social Responsibility (CSR) risk related to its supply chain.

More broadly, as Atos has committed to follow the ten principles of the UN Global Compact since 2010, it expects its Partners to abide by the same principles with respect to human rights, labor standards, protection of the environment and anticorruption.

In this document, "Atos Partner" refers to any Atos commercial partner, including but not limited to: suppliers, subcontractors, clients, resellers, distributors and business partners ...

## Commitment from Atos' Partners

Atos' Partners hereby commit to comply with the principles set forth in this Atos Partners' Commitment to Integrity to the extent applicable to them (the "Principles") throughout the term of the contract, such term including any renewal or extension. They will take the necessary internal measures to ensure that their officers, employees and representatives will comply with the same.

They acknowledge that they are expected to follow the ten principles of the UN Global Compact with respect to human rights, labor standards, protection of the environment and anticorruption, and to inform and encourage their direct business partners to follow these principles.

Atos' Partners, other than customers who are already bound by similar provisions under their main contract with Atos, acknowledge that the above commitment is an essential part of the contract, so that non-compliance with any of these will constitute a breach of their contractual obligations, such as to entail, according to its severity, the termination of the contract

### **Additional requirement concerning Atos' suppliers**

As key stakeholders in Atos' ecosystem, Atos' suppliers further acknowledge that they may be requested to be assessed by Atos preferred expert third party EcoVadis at least every second year, which will allow Atos to measure their CSR (corporate social responsibility) risk in the areas of Environment, Labor and Human rights, Ethics and Sustainable Procurement, and will be asked to implement corrective action plans and to be re-assessed within twelve months if the score is below Atos expected standard (40/100).



# Integrity Principles

The Principles, which Atos Partners' commit to comply with are set out below.

## Human Rights

Atos Partners must support and respect the protection of internationally proclaimed human rights in dealing with all their stakeholders; and take appropriate measures to ensure they are not complicit in human rights abuses. They must comply with the principles of the Universal Declaration of Human Rights of 1948 and with the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work. They must refuse any form of cruel, inhuman or degrading practices, such as corporal punishment, bullying, moral and sexual harassment, labor under constraint or threat, and more general prevent any commission or complicity in human rights violations.

### 1 Prohibition of child labor

Atos Partners must not use child labor. They must comply with the minimum age requirement, as defined by applicable laws and regulations. The strictest standards among applicable local, national and international laws shall apply, meaning that the laws providing for the highest age limit shall be observed.

### 2 Prevention of forced, bonded or compulsory labor

Atos Partners must ensure that they do not use forced, bonded or compulsory labor in their operations. They shall allow their employees to leave employment whenever they choose, and not require them to lodge deposits, money or papers with their employer, unless required by local laws or regulations.

### 3 Respect of employees' individual rights

Atos Partners must ensure decent working conditions and compensate workers fairly, and at a minimum in accordance with applicable wage and working hours laws and regulations, and address eventual systemic inequalities. They shall not require employees to work more than the legally permitted maximum number of hours a week. Atos Partners must provide fair and equal wage and guarantee the applicable national statutory minimum wage. They should comply with labor law during recruitment and also for the term of the fulfillment of the employment contract.

### 4 Respect of employees' collective rights

Atos Partners must ensure that employees' collective rights are respected, such as freedom of expression, freedom of association and right to collective bargaining. Any workers and employees are entitled to be represented, and form and join any social organization. Partners must comply with regulations guaranteeing individual and collective liberties, including the management of working hours, remuneration, training, trade union rights, hygiene and safety.

### 5 Prevention of harassment and discrimination, promotion of inclusion and accessibility

Atos Partners must prevent any form of harassment, including sexual harassment, and/or bullying in the workplace to align with the zero discrimination approach outlined in the Atos [Code of Ethics](#). They must treat all their employees fairly and equitably in accordance with local laws to prevent discrimination against any individual or group, and actively seek to promote inclusion, gender equality, accessibility and ethics in the workplace.

#### Additional requirement concerning Atos' suppliers

As signatory of the ILO Global Business Disability Network agreement, Atos is committed to being a leader in accessible digital products and services and ensuring that these are barrier free. Accordingly, Atos suppliers may be asked to provide accessibility [conformance reports](#) for digital products to document compliance with disability legislation globally and accessibility standards (ISO 40500, ISO 9421- 171, ISO 13066-1, EN 301549).

# Integrity Principles

## Health and safety of individuals

Atos Partners must ensure staff operate in safe and healthy working conditions and environment, abiding by local laws and regulations, and respecting the health and well-being of its workforce. Partners should maintain the ability to monitor and apply changing health and safety legislation as well as complying with mandatory health and safety training. Atos Partners should have the necessary systems and structure in place to identify and mitigate health and safety risks as well as report and investigate incidents.

## Business integrity

Atos Partners must comply with the highest standards relating to business integrity.

1

### Prohibition of corruption and bribery

Atos has a zero-tolerance approach to corruption. Therefore Atos Partners shall not take part in any form of corruption, bribery or influence peddling scheme, where they would, either directly or indirectly, (i) offer an undue benefit to a person in order for that person to improperly carry out or abstain from carrying out an act pertaining to his/her functions, or misuse his/her influence to obtain a decision from a public authority to the advantage of the offeror, or (ii) accept an undue benefit in order for them to improperly carry out or abstain from carrying out an act pertaining to their functions or misuse their influence to obtain a decision from a public authority to the advantage of the offeror.

It should be clearly stated that such prohibition equally applies:

- to both the active person (who offers the undue advantage) and the passive one (who accepts it), as they are both sanctionable, and irrespective of whether the passive person has solicited the benefit or not,
- in the private and public sector,
- to large, as well as small inducements (e.g. facilitation payments are prohibited), offered before or after the action or abstention of the passive person has occurred (i.e. as an incentive or a reward), directly or indirectly (e.g. to their relatives, spouses or family members).

4

### Compliance with sanctions and export control regulations

Atos Partners should comply with all applicable economic sanction and export control laws and regulations. They shall provide true, accurate and regularly updated information in relation to any export restrictions (U.S. contents, dual-use or military classification) affecting the products, software or technology provided to Atos. Where required, they shall obtain appropriate governmental authorizations to do so.

Atos Partners understand that for all matters pertaining to their relationship with Atos, they should not enter into any transactions with any country, person or entity with whom commercial transactions are forbidden under the United States or the European Union economic sanctions regulations.

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### Conflict mineral regulations

In accordance with EU regulations on conflict minerals ([2017/821](#)) and [Section 1502 of the US Dodd Frank Act](#) (further details being available [here](#)), Atos Partners must not use minerals (tantalum, tin, gold, and tungsten) from conflict regions (e.g. Democratic Republic of Congo, Rwanda, Tanzania, Uganda, Zambia).

In order to do so, they must take the necessary steps to determine if their products contain conflict minerals, and if so, develop compliance due diligence processes in compliance with such regulations, and be in a position to provide evidence, such as Conflict Minerals Reporting Template (CMRT), to ensure that all products are responsibly manufactured.

2

### Protection of data and privacy

Atos Partners must comply with all applicable data protection laws and regulations, as well as with recommendations, guidelines and guidance issued by competent regulatory bodies, and take the appropriate measures to protect personal data and privacy of individuals, including when processing Atos employees' data.

3

### Fair competition

Atos Partners must comply with all applicable antitrust and competition laws wherever they do business. They undertake not to participate in any anti-competitive practices, not to collude with their competitors on prices, bid rigging, market allocation, or exchange any sensitive information. Partners in a dominant position shall not abuse it to eliminate competition, or to impose excessive or discriminatory commercial conditions.

6

### Loyalty in business relationship

Atos Partners must ensure to act professionally and appropriately towards Atos, its employees, its partners and clients, as well as their employees. Partners shall not disparage, nor write or say anything malicious, discriminatory or defamatory against Atos, its employees, partners, clients, and their employees. Atos does not tolerate disrespectful or unprofessional usage of social media.

# Integrity Principles

## Environment

Following Atos Environmental Policy Principles and according to Atos emissions reduction targets grounded in climate science through the Science Based Targets initiative (SBTi) on limiting global warming to 1.5°C above pre-industrial levels and the net zero company by the latest 2039, Atos is committed to minimizing the environmental impact of its activities worldwide, and expects its Partners to apply the same standards. Atos Partners must identify and comply with all regulations and other legal requirements relating to the environmental impacts of their activities. They should prevent pollution and climate change through the adoption of appropriate procedures and controls, and address the challenges such as energy, Greenhouse Gases (GHG) emissions, waste, freight and travel both locally and globally.

### Additional requirement concerning Atos' suppliers

As key stakeholders in Atos' ecosystem, Atos suppliers are further expected to always respect the [Atos Environmental Policy Principles](#).

They should continuously develop and improve an environmental management system which minimizes their environmental impacts. They should identify, implement and monitor the necessary initiatives and action plans within their entities to steadily make progress with environmental challenges and reduce their impacts. For instance, commitments to improve energy efficiency, eco-design and renewable energy supply of the Partners can be asked by Atos. Also, management of GHG emissions is expected to be part of their environmental management system.

Atos is committed to become a net-zero company by the latest 2039 and this means to ensure its Partners are reporting, disclosing and managing their emissions in line with the Greenhouse Gas Protocol ([GHG Protocol](#)).

Regarding the above requirements, Atos could ask its suppliers to have an environmental certification such as ISO 14001 and an energy certification such as ISO 50001, and to display their environmental policy and environmental management system. Atos can also ask to complete the EcoVadis assessment at Atos supplier's costs and consider joining initiatives, such as Carbon Disclosure Project ([CDP](#)) or Science Based Target initiative ([SBTi](#)).

Atos suppliers shall lead their own suppliers to meet strict environmental standards and to continually work to evaluate and minimize its environmental impacts. They should ensure that the products and services they propose to Atos contribute to reduce its environmental impacts.

## Potential violations – Atos Group Alert System

Atos Partners undertake to inform Atos in a timely manner if at any given time they consider that there is a risk that they will no longer be able to comply with their commitment under this Atos Partners' Commitment to Integrity.



They further undertake to notify Atos without any delay in case of any potential violation, which would have already occurred, and to provide any information as reasonably requested by Atos on this matter.

In all circumstances, if Atos Partners' employees have any concern that a law, regulation, or any of the principles set out in the [Code of Ethics](#) has been or is about to be breached, or in the event of a threat or serious prejudice to the general interest of Atos, they can report through the Atos Group Alert System which is available at [groupcomplianceofficer@atos.net](mailto:groupcomplianceofficer@atos.net).

The individuals who raise the alert as well as the persons targeted by the alert shall benefit from the strictest confidentiality, subject to the intervention of a judicial authority. Anonymous reports are considered where this is permitted by local law.

Further information on Atos Group Alert System, notably on the data subject rights, can be found in the [Code of Ethics](#).

# About Atos

Atos is a global leader in digital transformation with 109,000 employees and annual revenue of c. € 11 billion. European number one in cybersecurity, cloud and high performance computing, the Group provides tailored end-to-end solutions for all industries in 71 countries. A pioneer in decarbonization services and products, Atos is committed to a secure and decarbonized digital for its clients. Atos is a SE (Societas Europaea), listed on Euronext Paris and included in the CAC 40 ESG and Next 20 Paris Stock indexes.

The [purpose of Atos](#) is to help design the future of the information space. Its expertise and services support the development of knowledge, education and research in a multicultural approach and contribute to the development of scientific and technological excellence. Across the world, the Group enables its customers and employees, and members of societies at large to live, work and develop sustainably, in a safe and secure information space.

[Find out more about us](#)

[atos.net](https://atos.net)

[atos.net/career](https://atos.net/career)

Let's start a discussion together



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