

Atos Partners' Commitment to Integrity



Atos

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1 - 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 during the Atos Annual General Meeting

As a global, AI-powered technology partner, Atos supports public and private organizations throughout their entire digital transformation journey, from strategy and architecture to operations and optimization. Based on its global footprint and local anchorage, Atos' digital solutions and integrated capabilities are designed to deliver impact for our clients, employees and society at large with end-to-end IT services. In addition, through its Eviden activities, Atos offers AI-powered technologies across four key domains: advanced computing, mission-critical systems, cybersecurity products and vision AI. Our customers rely on Atos to manage their most critical environments, particularly in regulated and sovereign sectors and Atos commits to conducting its business and addressing Atos customers' needs sustainably, responsibly and ethically.

Atos promotes and upholds the highest standards of business ethics and integrity. In line with the ten principles of the UN Global Compact, since 2010, the Group has formalized its commitment to integrity, notably through:

- [Atos Code of Ethics](#)¹, which materializes the requirements and ethical behavior expected from its employees
- The present Atos Partners' Commitment to Integrity, which sets out the ethical commitments that Atos expects from its vendors, suppliers, and other third-party partners along with their employees, personnel, agents, and subcontractors (collectively "Partners") prior to and throughout the entire business relationship. It sets forth the guidelines and requirements for ethical business practices and legal compliance.

This document supports Atos' commitments to minimize the environmental impact of its activities, including its efforts to decarbonize its supply chain in line with Atos science-based GHG reduction targets². This document plays also a key role in Atos Vigilance Plan (published in the Atos Universal Registration Document, updated annually) aiming at reducing and mitigating the risks arising from Atos activities and its supply chain, relating to violations of human rights, health and safety of individuals and the environment.

1. <https://atos.net/content/governance/atos-code-of-ethics-en.pdf>

2. <https://atos.net/en/corporate-social-responsibility/environment>



2 - Commitment from Atos Partners

As Atos Partners play a key role in allowing Atos to deliver services in line with its ethical and sustainable standards, they must commit to comply with the principles set forth in this Atos Partners' Commitment to Integrity to the extent applicable to them (the "Integrity Principles") while conducting business with Atos or on behalf of Atos. Atos Partners must take the necessary internal measures to ensure that their employees, personnel, agents, and subcontractors will comply with the same, and monitor their own operations in this regard, including the operations of their own suppliers.

Atos Partners acknowledge that the above commitment is an essential part of the contract and business relationship, 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.

As key stakeholders in Atos' ecosystem, Atos Partners further acknowledge that they may be requested to be assessed by an expert third party selected by Atos at least every second year, which will allow Atos to measure their sustainability risk in the areas of Environment, Labor and Human Rights, Ethics and Sustainable Procurement, and will be asked to implement corrective actions if their performance is not in line with Atos' expectations.

3 - Integrity Principles

The Atos Integrity Principles, which Atos Partners commit to comply with in their dealing with Atos or on behalf of Atos, are set out below. Atos Partners 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 ensure their direct employees, personnel, agents, and subcontractors to follow these principles.



3.1 Compliance with Laws

Atos Partners shall comply with all applicable laws, regulations, treaties and industry standards. They are responsible for maintaining awareness of their employees, personnel, agent and subcontractors on rules and regulations that are applicable to them or their subsidiaries in all regions and jurisdictions where the Atos Partner conducts business.



3.2 Human Rights

Atos supports and respects the protection of internationally proclaimed human rights in all its operations; and take appropriate measures to ensure it is not complicit in human rights abuses. Atos complies 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 and request its Partners to comply with the same.

Accordingly, Atos Partners must refuse any form of cruel, inhuman or degrading practices, such as corporal punishment, bullying, moral and sexual harassment, labor under constrain or threat, and more generally, 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, and have an appropriate mechanism to check the age of workers. In the event that a child is identified as being employed or present for work-related purposes on the premises of the Partner, the Partner shall, without delay, implement all necessary corrective measures in accordance with applicable laws and regulations, ensuring the best interests of the child are duly safeguarded.

2 Prevention of forced, bonded or compulsory labor

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

3 Respecting employees' decent working conditions and rights for fair compensation

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. They shall not require employees to work more than the legally permitted maximum number of hours a week, and any overtime must be voluntary and adequately compensated. They are required to observe labor law provisions both during the recruitment phase and throughout the execution of the employment contract.

4 Respect of employees' collective rights

Atos Partners must ensure employees' collective rights are respected, such as freedom of expression, freedom of association and right to collective bargaining. Any worker and/or employee is 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, resting period/time-off, training, trade union rights, hygiene and safety.

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

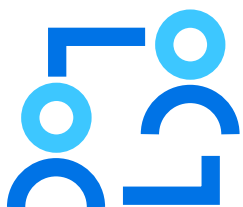
Atos Partners must prevent any form of harassment, including sexual harassment, and/or bullying in the workplace and be committed to maintaining a work environment where everyone feels safe and is treated with dignity and respect. They must treat all their employees fairly and equitably, prevent discrimination against any individual or group, and seek to promote accessibility, inclusion, gender equality and ethics in the workplace.

Considering Atos' commitment towards accessible and barrier free digital products, services and environments, Atos Partners are expected to comply with applicable legislation and accessibility standards (ISO 40500, ISO 9421-171, ISO 13066-1, EN17210, EN17161, EN 301549, WCAG 2.2).

6 Health and safety of individuals

Atos Partners must ensure they operate in safe and healthy working conditions and environment, abiding by local laws and regulations, to protect and respect the health and well-being of their employees, personnel, agents and subcontractors. Atos Partners must have the necessary systems and structure in place to provide adequate training and access to safety information, identify and mitigate health and safety risks to adopt appropriate preventive precautions as well as report and investigate incidents.





3.3 Business Integrity

By adhering to rigorous ethical principles, Atos ensures stakeholders can trust its operations and its responsible approach to face modern challenges. Atos always stands against any form of corruption and constantly strives to improve its activities in the most sustainable way, both environmentally and socially; hence Atos expects its Partners to behave ethically and with the highest standards relating to business integrity to ensure Atos services are always delivered in accordance with Atos values.

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 their functions, or misuse their 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.

This commitment to prohibition of corruption applies equally:

- to both the active (who offers the undue advantage) and the passive person (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 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).

Facilitation payments may be considered as a form of corruption under certain jurisdictions and are therefore strictly prohibited in the course of Atos activities.

2 Protection of data and privacy

Atos Partners must protect personal data and privacy of individuals, including when processing Atos employees' and client's data (on behalf of Atos) and comply with all applicable data protection laws and regulations, as well as with recommendations, guidelines and guidance issued by competent regulatory bodies, and take appropriate measures in this respect.

3 Fair competition

Atos Partners must undertake not to participate in any anti-competitive practices, not to collude on prices or price-related information, engage in bid rigging or market allocation; nor exchange any commercially sensitive information with their competitors outside of legally permitted frameworks. Atos Partners who find themselves in a dominant position undertake not to abuse it to eliminate competition, or to impose excessive or discriminatory commercial conditions. Accordingly, Atos Partners are required to comply with all applicable competition laws wherever and whenever they do business.



4 Compliance with sanctions and export control regulations

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

Atos Partners understand that for all matters pertaining to their relationship with Atos, they shall not enter any transactions with any country, person or entity with whom commercial transactions are forbidden under the economic sanctions regulations emanating from the United States, the European Union or internationally recognized organizations (such as the United Nations).

5 Prevention of Fraud

Atos Partners shall conduct all their business activities with integrity and transparency, and must not engage in any form of fraud, deception, or misrepresentation. This includes, but is not limited to, falsifying records, submitting inaccurate invoices, manipulating financial or operational data, or concealing material information or colluding with third parties to gain undue advantage.

6 Conflict mineral regulations

In line with the EU Conflict Minerals Regulation, Atos requires its Partners to procure only responsible sourced minerals (regarding tantalum, tin, gold, and tungsten, as define in the regulation). In accordance, Atos Partners must take the necessary steps to determine if their products contain the so-called “conflict minerals”, depending notably on their origin and place of extraction. Atos Partners should develop strong due diligence processes in compliance with the regulation to be in a position to demonstrate that all products are responsibly sourced and manufactured.

“Atos Partners are expected to implement internal controls and procedures to detect, address and prevent all undue business practices and promote business integrity across their operations.”





3.4 Environment

In accordance with the [Atos Environmental Policy Principles](#)³, Atos is committed to minimizing the environmental impact of its activities worldwide, including in its sourcing and procurement activities of its value chain.

As key stakeholders in Atos ecosystem, Atos Partners are further expected to always respect the Atos Environmental Policy Principles and must identify and comply with all regulations and other legal requirements relating to the environmental impacts of their activities throughout the entire duration of their contractual relationship with Atos, including any amendments or newly enacted legal requirements.

They should continuously develop and improve an environmental management system which minimizes their environmental impacts including, but not limited to, climate change, resource use and waste generation, water and marine resources, pollution, and biodiversity and ecosystems. They should identify, implement and monitor the necessary initiatives and action plans at global and local levels to steadily make progress with environmental challenges and reduce their impacts.

1 GHG emissions reductions

Atos emissions reduction targets⁴ are grounded in climate science through the Science Based Targets initiative (SBTi) and aligned with the Paris Agreement on limiting global warming to 1.5°C above pre-industrial levels latest by 2050. Atos recognizes that a substantial part of its emissions come from its supply chain and as such, expects its Partners to commit to the same.

Atos Partners should set up science-based GHG targets for all Scopes (1, 2 and 3) under the [GHG Protocol](#)⁵ methodology. They should disclose to the Carbon Disclosure Project (CDP) on a yearly basis and provide detailed emissions data for the services and products sold to Atos.

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 Partners should assess the climate physical and transition risks and opportunities and set up adaptation policies and action plans to ensure business continuity.

2 Favoring circular economy and reducing waste

Atos Partners should define, adopt, and implement a formal policy, targets and action plans that integrate the core principles of the circular economy – namely Refuse, Reduce, Reuse, and Recycle – across their operations and in the delivery of goods and services to Atos.

As part of its environmental responsibilities, Atos Partners commit to actively minimizing waste generation and to managing all types of waste (including hazardous and non-hazardous) in accordance with the waste hierarchy. In particular, Partners should prioritize recovery (e.g. reuse, recycling, energy recovery) over disposal (e.g. landfill, incineration without energy recovery) in all waste management practices.

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

3. <https://atos.net/content/assets/csr/atos-environmental-policy-en.pdf>

4. <https://atos.net/en/corporate-social-responsibility/environment>

5. <https://ghgprotocol.org/>

4 - Potential violations – Atos Group Ethics 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.

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 <https://atos.integrityline.app/>. Integrity Line is a secured web-based whistleblowing platform, hosted by an independent provider from Atos. Atos is committed to collecting and managing all reports raised through Integrity Line. An alternative reporting channel is available for all Atos Partners employee via the mailbox groupcomplianceofficer@atos.net.

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](#) and the <https://atos.integrityline.app/>.



About Atos

Atos Group is a global leader in digital transformation with c. 67,000 employees and annual revenue of c. €10 billion, operating in 61 countries under two brands — Atos for services and Eviden for products. European number one in cybersecurity, cloud and high performance computing, Atos Group is committed to a secure and decarbonized future and provides tailored AI-powered, end-to-end solutions for all industries. Atos Group is the brand under which Atos SE (Societas Europaea) operates. Atos SE is listed on Euronext Paris.

The [purpose of Atos Group](#) 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

atos.net/career

Let's start a discussion together



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