



Our commitment to ethical, transparent and sustainable performance

In this new era of ubiquitous, mission-critical digital services, excellence in ethics, compliance and sustainability is a strategic priority for Atos and for all our clients.

At Atos we are committed to ensuring that a culture of compliance permeates throughout our ecosystem, whether this is our top management setting the right tone for employees or third parties who work with Atos and who need to establish their practices comply with our standards. Compliance is a live process for all of us on a daily basis. High standards of ethics and compliance play a fundamental role in our success as a business. They are a competitive advantage that are highly valued by our clients.

Our expertise enables us to ensure that high ethical standards are built into our technology and digital innovations. This 'ethics by design' approach differentiates us from other players and positions us to lead the market in this new phase of growth.

In 2020, we revised our Group Code of Ethics to reflect the Atos raison d'être and to add information about inclusion in the workplace, human rights, data

protection and the environment.

We work every day to improve our compliance program and build on our successes. In 2020 this involved redesigning our corruption risk mapping process, formalizing antitrust guidelines and undertaking new internal communications initiatives, such as to promote UN Anti-Corruption Day.

For the first time we also made our annual compliance review publicly available, explaining in detail our compliance organization, activities and projects in our compliance program. The compliance review presents how Atos manages compliance risk throughout the risk management cycle of prevention, detection and remediation and ongoing monitoring.

Another major development in 2020 was an assessment of our Group Vigilance Plan which was revised to ensure improved effectiveness, governance and ongoing monitoring in line with the French legislation on the Duty of Vigilance.

[Visit the Atos Compliance Review 2020 on atos.net](#)

65% Net Promoter Score for all clients

100% coverage of ISO 27001 certifications

100% compliance all AFEP-MEDEF corporate governance recommendations

98% employees successfully completed the Code of Ethics e-learning

82 patents filed

63% total spending with suppliers assessed by EcoVadis

To find out more visit the 2020 Universal Registration Document section 5.4 Governance



Interview with Alexandre Menais, General Secretary and Chief Compliance Officer, Atos

“High ethical standards
are built into our
technology and
our digital
innovations.”

Alexandre Menais



Updating our approach to vigilance

In 2020, Atos undertook a comprehensive review of the methodology and approach in its Plan of Vigilance to ensure compliance with the French Duty of Vigilance Act which has recently come into force.

The review involved consultation with all key stakeholders directly involved in the prevention and mitigation of the risks related to human rights, safety and security and the environment in Atos's own activities and throughout its supply chain.

The Group Corporate Social Responsibility, Human Resources, Security, Legal and Compliance and Procurement functions of Atos were all consulted as part of this process. In France, the Duty of Vigilance Act establishes legal obligations for corporate social responsibility, not only in companies' own businesses but also throughout the supply chain. It applies to large organizations employing more than 5,000 employees in France or 10,000 employees worldwide.