



# 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  
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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.



# Shaping the digital space

In every sphere in which we operate Atos is committed to taking the lead on digital innovation, transparency and ethics.

## Building the global data economy with GAIA-X

In 2020, Atos co-founded GAIA-X to build a secure and transparent European data and cloud framework. The 22 founding members of the GAIA-X Foundation are digital leaders, industrials, academia and associations with a shared commitment to a transparent European process, openness and broad participation. GAIA-X initiatives will support the European Union's ambition to consolidate its leadership in the global data economy.

Building trust and interoperability for all cloud users and providers is essential for the creation of digital ecosystems. GAIA-X will address this challenge through a common set of policies, an Architecture of Standards and a set of Federation Services which bring together existing cloud providers and their services and in which data and applications can be handled in a way that ensures full control. It will enable organizations of all sizes and across all sectors to benefit from hyperscaler offerings in Europe while respecting a set of essential policies.

## Promoting ethical and trustworthy AI with ETAMI

ETAMI, Ethical and Trustworthy Artificial and Machine Intelligence, is a collaboration between industry and academia towards the development and foundation of a European organization to support Conformity Assessment of the development and deployment of artificial intelligence (AI).

The initiative aims to respond to the perceived growing need for certification standards relating to the way that AI-enabled systems and products are conceived, developed, deployed and maintained. Whilst a number of principles,

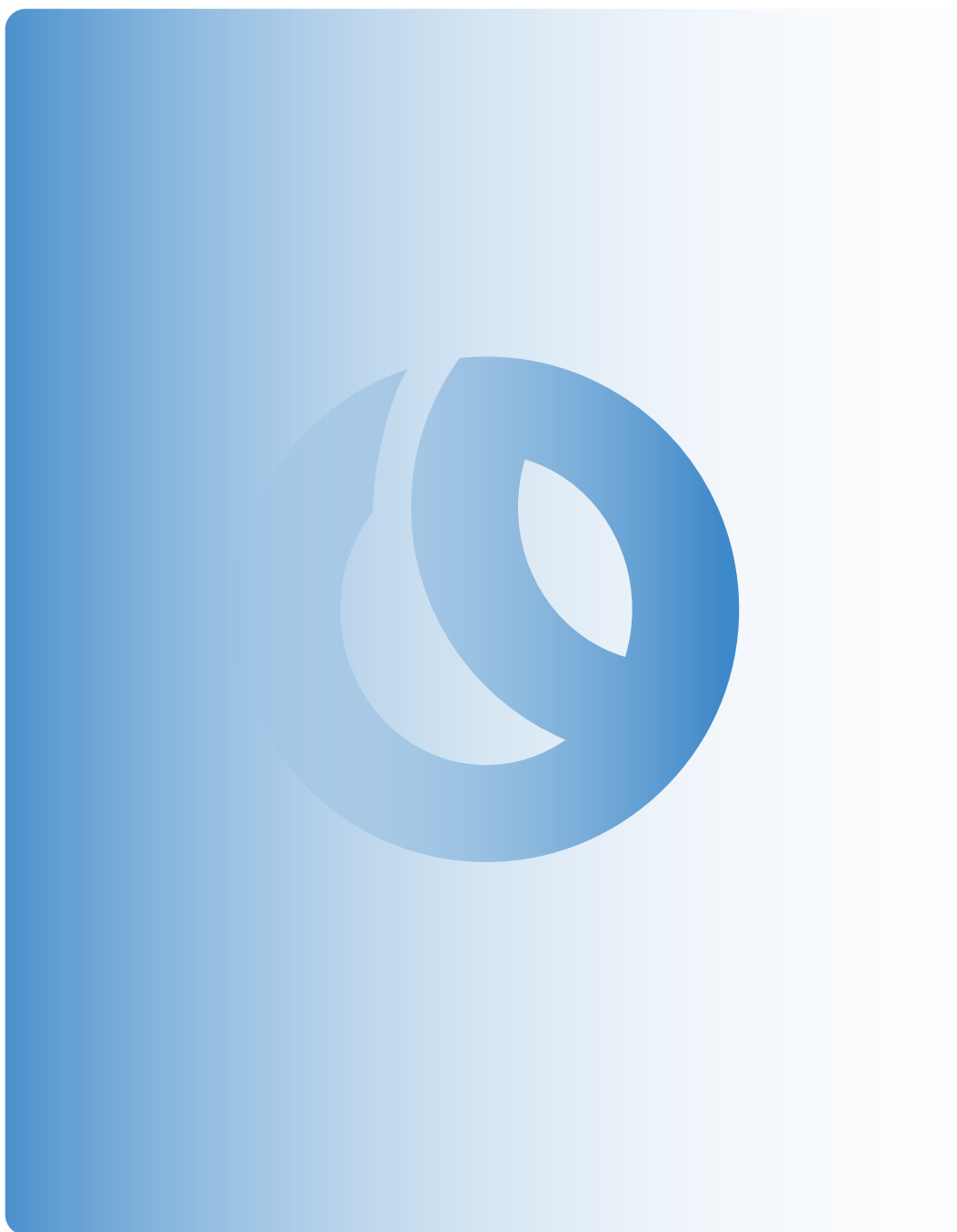
regulations and standards already exist, there is currently no clear mechanism for transparently and systematically assessing relevant compliance across the increasing broad scope of AI use cases. The ETAMI program is designed to address this gap.

Five members of the Atos Scientific Community are involved in various ETAMI working groups on AI-related areas that include: best practices, standards, regulations, and lifecycle management. The objective of the work (which will continue throughout 2021) is to propose a public standard or framework for ethics in AI, as well as piloting the certification based on this standard drawing on a range of industry use cases. Partner contributions are made on a voluntary basis with all finalized output publicly available.

## Delivering digital security with the Charter of Trust

As one of the founding members of the Charter of Trust with other leading global companies and organizations, in 2020 Atos reaffirmed its commitment to continue to foster an ecosystem of trust where knowledge is shared, innovation encouraged, and resilience against cybersecurity threats improved. Atos Group Security created a Charter of Trust (CoT) team to ensure we maintain compliance with CoT principles and security requirements. A substantial number of enhancements were made during 2020 to put in place many of the CoT principles.

In line with our work within the Charter of Trust working group on securing the digital supply chain, we have identified 17 baseline requirements and we have updated our security requirements for suppliers.



Our top 250 vendors are now provided with this information when receiving newly-issued purchase orders and are requested to acknowledge this information allowing Atos to strengthen its security approach towards its supply chain.

**Corruption risk mapping**

In 2020, Atos revised the methodology used to build its corruption risk mapping, in line with Enterprise Risk Management methodology (ERM), in order to identify and assess corruption and influence peddling risks. The exercise covered the entire Group.

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



## Creating value through Corporate Social Responsibility

For each key process identified in the Book of Internal Control (BIC) as containing a risk of corruption, top managers were asked to assess the risk types and scenarios derived from actual cases reported and other risk mapping exercises conducted within the Group.

The outcome of the 2020 Group Corruption Risk Mapping, including a mitigation plan to address global and local points of attention, was presented to the Group Management Committee and to the Audit Committee. The Group Management Committee will receive progress reports on a semesterly basis going forwards.

### Keeping our workforce alert to ethical risks

The e-learning course on the Atos Code of Ethics is mandatory for all employees without exception. This module ensures a thorough understanding of Atos's ethical standards and how we promote fair practices in our daily business activities. In 2020, 98% of employees completed the module.

To complement the e-learning module on the Code of Ethics, ETO<sup>2</sup>S (Ethics in Tier One Organization School) specific classroom training sessions are organized throughout the Group which senior managers are required to follow as they are well placed to lead their teams by example.

In addition, to ensure a deeper understanding of the specific risks related to corruption, Atos uses an e-learning module prepared by Transparency International which is available to all employees and helps identify appropriate behavior in an operational context. It provides an in-depth understanding of the UN Global Compact's tenth principle against corruption and the UN Convention against Corruption as it applies to the private sector.

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### Integrating our sustainability strategy in our procurement and supply chain management

The Atos Procurement & Supply Chain Management team of 400 procurement professionals across 26 countries

coordinates anything from sourcing to contracting activities, together with 40 supplier managers who monitor our key contracts and 350 supply chain experts who manage, build, deliver and process our Big Data & Security and Unified Communications and Collaboration products. In 2020, we continued to improve performance in relation to our key KPIs: sustainable savings, maintaining cost competitiveness, introducing or reintroducing a consumption based approach to lower the cost base, further consolidating the number of suppliers and driving CO<sub>2</sub> emission reduction. This was achieved through innovative and collaborative approaches with our stakeholders and suppliers.

As a digital leader, Atos aims to streamline its procurement processes. In 2020 we created an end-to-end state-of-the-art digitalized procurement process using guided buying for ordering, electronic requests (E RFX) to support our sourcing process, automation technology (RPA) and chatbots to initiate purchase requests and reporting, together with analytics to transform data into information and ePO e-Invoices and e-Signatures.

To leverage and enhance mutual success with third party suppliers, we organized Atos's first virtual supplier day in November 2020. Our top 250 suppliers were joined by our CEO and members of the Group Management Committee to discuss our 2021 key themes of decarbonization, cost competitiveness, and go-to-market opportunities.

Over half of Atos's emissions come from our supply chain so this year we stepped up our sustainability actions by seeking to influence our partners to join our efforts to become net-zero by 2028. We designed our own supplier rating and reporting systems, increased our sustainability evaluation criteria for new procurement activities, and developed a team of decarbonization ambassadors across the procurement function to support both internal and external colleagues.



## Interview with Aurelia Tremblaye, Group Chief Procurement Officer, Atos

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Aurelia Tremblaye

