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# Atos Modern Slavery Statement

for year ended 31<sup>st</sup> December 2019



Trusted partner for your Digital Journey

**Atos**

# Introduction

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps that Atos IT Services UK Limited and other relevant group companies<sup>1</sup> (“Atos”) have taken during the year ending 31 December 2019 to ensure that slavery and human trafficking are not taking place in their supply chains and in any parts of their business.

Conducting business in an ethical and sustainable way is part of Atos culture and strategy in all of its spheres of influence, it is a “must have” that Atos is proud to integrate into the company’s thinking and processes. We truly believe that our responsibilities go beyond our own company and we strive to embed our values in the relations with all our employees, customers, partners and across our supply chain. In 2017 we published our first Modern Slavery statement and at the same time put in place a number of initiatives in relation to excellence in corporate standards and responsibility to be developed during the following financial years. Since then we have made a number of improvements to the Atos Corporate Social Responsibility programme: we have initiated a comprehensive risk mapping exercise within Atos’ supply chain, we have amended our suppliers

terms to include references to modern slavery, we have updated our Whistleblowing Policy to include specific guidance for modern slavery, we have developed new tailored training for all Atos employees to help them understand how to identify risks and raise concerns about potential modern slavery offences, and we have created a speak-up function that can be accessed internally and also externally on our UK&I website. These initiatives are all in line with the Modern Slavery Act 2015 requirements, which we continue to implement in our corporate processes.

# Our Business and Supply Chain

Atos is a leader in digital services, delivering a wide array of digital solutions, including advanced computing, analytics, AI and automation, digital consulting, internet of things, cloud solutions, infrastructure and foundation services, big data and cyber-security. With over 8,400 people based in the United Kingdom, Atos is focused on business technology that powers progress and helps organisations to create their firms of the future in a more sustainable society.

Atos' client base spans different sectors and markets: from energy and utilities, to public and defence, healthcare and transport sectors, from telecom, media and technology, to manufacturing and retail and hospitality industries, financial services and insurance.



suppliers representing 80% of the spend for services and products

In the United Kingdom, with around £613 million annual third party spend and 107 suppliers representing 80% of the spend for services and products to both Atos and our clients, we are committed to developing a high-performing supply chain in its design and conduct as well as having responsible sourcing practices in place.



spend in 2019 with suppliers located in the United Kingdom

The Atos supply chain is mainly located in 21 countries in Europe and North America where 99.93% of the overall supplier spend is directed; in 2019 we spent 89.66% with suppliers located in the United Kingdom. In 2019, IT requirements spend made up the greatest part of purchases (44.7% of demands) the majority of which was made with the largest IT Tier 1 suppliers. Subcontracting was the second largest source of procurement spend with 36.7% while the remaining 18.6% of this spend was related to so called 'indirect' spend including mobility, professional services, facilities management and real estate.

†This statement sets out the steps taken by Atos IT Services UK Limited, Atos UK International IT Services Limited and Atos BPS Limited, insofar as they fall within the scope of section 54(2) of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

# Policies and Contractual Controls

Since 2009, Atos has developed, in alignment with Atos companies operating in other countries, a Corporate Social Responsibility programme, which also includes labour practices, with a principle objective of being able to manage the impacts of the company's operations in a responsible manner and to integrate social and environmental factors in our supplier solutions. A number of policies and documents have been developed and implemented to achieve this objective

## Code of Ethics

Atos Group<sup>2</sup> has adopted a [Code of Ethics](#) which all Atos employees worldwide are required to train on and adhere to in their working practices.

Within the Code of Ethics, Atos is committed to ensuring compliance with international labour regulations and to act responsibly when dealing with all its partners while guaranteeing strict compliance with laws and regulations.

Most importantly, the Code of Ethics refers to the United Nations Global Compact principles on human rights, labour, environment and anti-corruption, which includes adhering to the elimination of all forms of forced and compulsory labour and the effective abolition of child labour, upholding freedom of association and the effective recognition of the right to collective bargaining as well as supporting and respecting the protection of internationally proclaimed human rights.

Atos is amending its Code of Ethics to create even more emphasis on human rights, with express references on the fact that Atos rejects human trafficking and all forms of human slavery.

## Human Rights Policy Statement

In May 2018, Atos Group issued a [Human Rights Policy Statement](#) co-signed by the Head of Group Human Resources and the Group General Counsel and Group General Secretary.

According to the statement Atos Group acts to prevent infringements on internationally recognized human rights as expressed in the International Bill of Human Rights, and on the principles set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. The Group aligns its prevention with the United Nations' Guiding Principles on Business and Human Rights and refers to the United Nations Global Compact principles on human rights, labour, environment and anti-corruption.

Moreover, Atos aims to be a responsible employer globally, acting fairly in its labour and employment activities, and to conduct business in an ethical and sustainable way, in all its spheres of influence: employees, customers, partners, and across the supply chain.

## Code of Conduct for Relationships with Suppliers

In addition to the Code of Ethics which is the backbone of Atos' corporate culture, Atos employees who perform procurement related activities on behalf of Atos or who have regular contacts with suppliers must abide by a strict Code of Conduct for Relationships with Suppliers which establishes the elementary rules that each employee must respect in the performance of his or her work with clear references and special attention to social rights.

In particular, as far as slavery and human trafficking are concerned, the Code of Conduct clearly states Atos' intention to select suppliers who do not use, nor permit their own suppliers and subcontractors to make use of, child or forced labour, do not practice or support any psychological or physical coercion, respect individual and collective liberties, and comply with labour laws on recruitment and during the fulfilment of the employment contract.

This document forms part of the induction for every new member of the Procurement team who needs to sign it to confirm having read and understood it. Failure to comply with this Code of Conduct may result in disciplinary action, up to and including termination of the contract of employment.

<sup>2</sup>The term Atos Group refers to all the companies controlled directly and indirectly by the holding company of the group, Atos SE

## Global Ethics and Compliance Policy

The Global Ethics and Compliance Policy provides guidance on ethics and compliance in respect of human rights and a number of other matters. Atos managers worldwide must comply with this Policy and its principles must be followed by all employees working in or with Atos.

This Policy prohibits Atos employees, partners, subcontractors, and agents from engaging in human trafficking-related activities. These activities include engaging in sex trafficking, using force, fraud, or coercion to subject a person to involuntary servitude, or obtaining labour from a person by threats, providing housing that fails to meet host country standards, and failing to provide an employment contract or work document where required by law.

Therefore, Atos managers are required to ensure that within their entities:

- (i) a clause is inserted in every contract with a partner that entitles Atos to terminate the business relationship immediately and without penalty if the partner or its subcontractors is engaging in human trafficking-related activities;
- (ii) a monitoring and alert system is set up throughout the relationship with the partner, to detect any human trafficking-related activities, and to respond appropriately to anything that raises any reasonable suspicion of such behaviour;
- (iii) if any doubt or risk is identified, input must be sought from global or local compliance departments to carry out an in-depth assessment of the nature of the risk and its consequences.

Additionally, the Policy reminds that Atos does not tolerate any discrimination, harassment or violence of any kind in the workplace. Therefore, Atos managers are required to take all measures necessary to prevent discrimination, harassment, physical violence and psychological abuse within their entities.

## Supply Chain Standards

Atos' [Business Partner's Commitment to Integrity](#) establishes requirements that every Atos supplier has to comply with in three areas: human rights, business integrity and environmental impact.

Prevention of forced or compulsory labour, child labour, harassment and discrimination, are part of the human rights requirements that Atos business partners, including suppliers, have to support, respect and encourage to be respected within their supply chain.

Prior to participation in any Atos sourcing event, a potential supplier must confirm acknowledgement of the Business Partner's Commitment to Integrity and the supplier will sign up to its content upon the signature of the Atos contractual terms and conditions.

By accepting the Business Partner's Commitment to Integrity, each supplier also recognises Atos' right to perform on-site audits to ensure that it has put adequate internal procedures in place to enable it to fulfil its integrity commitment.

Failure by a supplier to comply with Atos' requests for information in relation to the Business Partner's Commitment to Integrity or to meet Atos' requirements set out in this commitment, can result in its exclusion from Atos' preferred suppliers list and, once a contract is in place, even to the termination of the contract with that supplier.

The Atos UK standard supplier contractual terms and conditions include obligations on suppliers to comply with the Modern Slavery Act 2015, and ensure that (i) neither they nor their subcontractors are under investigation nor have been convicted for modern slavery offences, (ii) they conduct reasonable due diligence on their own supply chains' working conditions and practices and notify Atos immediately in the event of suspected slavery and human trafficking offences taking place in their supply chains.

Since 2018 the Atos Code of Ethics has been an integral part of the standard supplier contractual terms used in the United Kingdom. Accordingly, if a supplier violates the Code's principles, Atos can terminate its relationship with the supplier.

# Risk Assessment and Due Diligence in Relation to Slavery and Human Trafficking

We recognise that one of the challenges in ensuring that slavery and human trafficking are not committed throughout our supply chain is not only to clearly communicate our expectations for fair labour practices to our suppliers but also to anticipate, identify, control and manage any such possible risks and impacts. Therefore, we have built appropriate mechanisms at all stages of the procurement cycle, from the initial supplier selection through to on-going supplier management.

## Risk assessment

To gain understanding of the possible risk related to human rights abuse within the supply chain, Atos Global Procurement has started a category/country risk mapping exercise of the whole of the Atos Group supply chain at Tier 1 supplier level. The outcome of the exercise will reveal a map of the risk carried in certain categories and countries, which will be addressed by an action plan based on the results. The action plan will include measures such as supplier education on human rights topics and further supplier Corporate Social Responsibility (CSR) assessments.

In order to further appreciate the risks related to human rights abuse within the business, Atos legal community from global and local entities conducts every two years a legal risk mapping aimed at measuring the impact, likelihood and mitigation effectiveness of the human rights risk. This human rights risk has been assessed as low and is well mitigated through all the initiatives described in this modern slavery statement such as: the adoption of human rights related policies, the insertion of clauses in all contracts with partners allowing termination of the business relationship for any breach of human rights, the request made to our partners to adhere and abide by the Atos Business Partners' Commitment to Integrity.

## EcoVadis' assessment

In addition to the initial due diligence, since 2009, Atos is using EcoVadis, a specialist assessor of sustainability in global supply chains, to proactively monitor and evaluate in depth its suppliers' portfolio in four key areas: environment, labour practices and human rights, fair business practices as well as sustainable procurement. The area focusing on labour practices and human rights is described by EcoVadis as below: *"The criteria in this theme are divided into 2 parts: first on human resources (such as health & safety, working conditions, structured social dialog, career management & training) and secondly on human rights issues (such as child & forced labour and discrimination)."* In addition to the labour practices and human rights section, EcoVadis also assesses the supplier's own procurement practices, giving us insights regarding their expectations towards possible Atos Tier 2 suppliers.

Specifically, EcoVadis methodology framework assesses the policies and measures put in place as well as the reporting published by companies with regard to those four key areas. The assessment, conducted by CSR experts, is made on the basis of the companies' answers to a survey which is dynamically adapted to their country, sector and size, on the basis of supporting documentation, and on public and stakeholders' (NGOs, trade unions, press) information. The EcoVadis assessment is conducted every two years.

## Due Diligence

Sustainability, which includes labour practices and human rights, is one of our key supplier evaluation criteria when selecting new partners, suppliers or subcontractors, representing up to 10% of the scoring used in the evaluation of suppliers' answers to tenders. Our suppliers are asked to demonstrate their maturity on CSR themes by submitting any existing and globally recognised accreditation and certification.

Also, if an area of concern is identified, and always depending on the supplier product/service and geography, our procurement managers, accompanied by the relevant subject matter experts, may choose to proceed with a physical audit of the supplier's facilities and operations or may request further details and documentation to eliminate any concerns before progressing any further with the specific supplier.

Through the evaluation of potential suppliers' labour practices and their regular assessment via sustainability audits, Atos considers modern slavery at all stages of procurement, from identification of a requirement to delivery.

As a result of this EcoVadis assessment, strengths and improvement areas are identified and addressed by a Corrective Action Plan ("CAP") for the relevant supplier to prepare and comply with. Our procurement sustainability managers proactively monitor the progress of these CAPs by the suppliers concerned and those with insufficient scores are advised they will be re-evaluated in 12 months. In 2019, only 10% of our panel at global level had low scores. However, where a score cannot be improved a decision may be taken to cease our engagement with the relevant supplier.

In 2019 EcoVadis granted 'Gold' status to the Atos Group for its Corporate Social Responsibility performance, confirming its leadership position in the IT Industry in respect of CSR themes.

# Effective actions taken to address modern slavery

## Disclosure of identified instances of modern slavery

In the past we have had a case of a supplier of indirect products that was unable to provide sufficient assurances around absence of child or forced labour in its supply chain. Due to the possible risks associated with the products that were being purchased, we decided to cease trading with this company and to procure products from an alternative, assured supplier.

Also, since 2018 EcoVadis offers an alert service providing news updates and information about watch lists, including legal proceedings involving Tier 1 suppliers that have completed the EcoVadis assessment. As a result, we are made aware of any wrongdoings including those in relation to modern slavery offences by our supply chain. The mechanism has alerted Atos on two occasions during 2019 regarding possible human rights violations. In both cases Atos has reached out to the supplier to investigate the issue further, understand the impact and ask the supplier for an action plan to mitigate any future risk.

In the first instance, a supplier had discovered modern slavery risks connected to the use of migrant workers in a specific part of its own supply chain in the Middle East and Asia. The company has since implemented further safeguards to respond to and address the issue. In the second instance, a supplier was successfully prosecuted for modern slavery in a specific case in its Tier 2 supply chain in South America. The company has also taken steps to address the issue. In both these cases, Atos did not receive any goods or services linked to the affected parts of the supply chain. In any event, the alert system was effective in highlighting the risk, which enabled all parties to review the details and discuss any potential need for mitigating actions.

## Publication of KPIs

In order to assess the actions taken by Atos in preventing modern slavery in its supply chains, in this statement Atos has decided to report on the following key performance indicators:

- number of employees trained to the Code of Ethics e-learning: UK target of employees to be successfully trained to the Code of Ethics e-learning is 90%. The 2019 report shows that 92% employees in the United Kingdom have been trained to the Code of Ethics e-learning.

## Company-level grievance mechanisms

In the United Kingdom, Atos has a Whistleblowing Policy which educates and advises employees on the legalities and principles of whistleblowing and how to make a disclosure about suspected wrongdoing in the workplace. All employees (including workers, interns, contractors, agency staff, casual workers and consultants) are encouraged to raise any genuine concerns about potential criminal, fraudulent or dangerous activities and the channels for doing so are communicated regularly. Support is made available through the process by the Employee Relations Advisory Team.

Atos has updated the Whistleblowing Policy to include clear and specific guidance on modern slavery. We have clearly stated our commitment to tackling modern slavery and we have created and communicated new speak up channels for raising any concerns, including an online channel through our internal HR Portal, a confidential phone line to an external third party and an external contact point on our Atos UK&I website.

In the Business Partner's Commitment to Integrity, we also make an Atos Alert System available to all business partners to notify Atos in a timely manner of any suspected violation of the Business Partner's Commitment to Integrity that might impact the relationship with Atos, whether they are allegedly committed by Atos employees or partners, or the business partner's employees.

- number of suppliers and related level of spend subject to an EcoVadis assessment:  
The Atos Group target is to ensure that, by end of 2021, those suppliers who represent 70% of its global spend would have undertaken an EcoVadis assessment. The year 2019 closed with 292 suppliers having a valid EcoVadis assessment, which represents 56% of Atos Group global spend



# Training

The Code of Ethics Policy has formed part of Atos employees' employment contracts since 2011. Atos requires all employees, regardless of their position, to complete a mandatory e-learning module that explains the principles of the Code of Ethics and includes a quiz to ensure understanding from the employees.

In 2018 a revised version of the Code of Ethics was launched and all employees were required to retake the training. All new employees must complete it within three months of joining. Compliance with this training requirement is consistently over 90%, fluctuating with the number of new joiners and the point at which they complete the training.

Atos has supplemented the Code of Ethics training with a new specific training course on 'Tackling Modern

Slavery' that will also be mandatory for all current UK&I employees and new joiners. The e-learning course explains our commitment to reducing modern slavery and the steps Atos is taking to tackle it in our organisation and within our supply chain. It helps employees understand different types of modern slavery, how they can be identified and explains the actions we expect people across our business to take to reduce the risk of modern slavery. It also provides links to speak up options in the event that employees wish to raise concerns.

In addition, all members of the Atos UK&I Procurement team have undertaken training on our legal obligations and responsibilities with regard to modern slavery.

# Closing Statement

Atos is globally recognised as a sector leader for its Corporate Social Responsibility programme. We understand that slavery and human trafficking risks may pose a threat to international firms and are constantly evolving in the current global environment. For this reason, Atos intends to continue to put these risks at the heart of next year's Modern Slavery statement and its efforts towards excellence in corporate standards and responsibility.

This statement was approved by the Boards of Directors of Atos IT Services UK Limited, Atos UK International IT Services Limited and Atos BPS Limited.

Signed



**Clay Van Doren**  
CEO Atos UK&I  
June 2020



**Richard Holland**  
CEO Atos BPS Limited  
June 2020

# About Atos

Atos is a global leader in digital transformation with over 110,000 employees in 73 countries and annual revenue of over € 11 billion.

European number one in Cloud, Cybersecurity and High-Performance Computing, the Group provides end-to-end Orchestrated Hybrid Cloud, Big Data, Business Applications and Digital Workplace solutions. The group is the Worldwide Information Technology Partner for the Olympic & Paralympic Games and operates under the brands Atos, Atos | Syntel, and Unify. Atos is a SE (Societas Europaea), listed on the CAC40 Paris stock index.

The purpose of Atos is to help design the future of the information technology space. Its expertise and services support the development of knowledge, education as well as multicultural and pluralistic approaches to research that contribute to scientific and technological excellence. Across the world, the group enables its customers, employees and collaborators, and members of societies at large to live, work and develop sustainably and confidently in the information technology space.

Find out more about us

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

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

Let's start a discussion together

