
Atos Compliance Review 2020



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Atos

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Atos management commitment



Elie Girard,
Chief Executive Officer

At Atos we are convinced that our future success depends on the principle that business should be conducted both profitably and responsibly. We are committed to establishing a culture of integrity, ethics and compliance in Atos. This management commitment is important, but it is not enough: every department and every employee has a role to play in making this a living process, taking account of compliance risks in how we operate on a daily basis.

The Code of Ethics is part of the DNA of Atos. The Atos Code of Ethics sets out our approach to compliance. In meeting the challenges of an increasingly complex and constantly evolving regulatory and geo-political environment, Atos targets the highest ethical standards and promotes them as a competitive advantage, bringing value to the business and to our customers.

This is why ethics and compliance are key priorities for us, from the very top of the company to the heart of operations. While we indeed have a zero-tolerance approach to corruption and comply with applicable laws in all countries, we also want to go further and to conduct our business in line with the highest ethical principles and practices, internally and with third parties.

I am delighted to introduce this year's Compliance Review, which we are making public for the first time. Compliance will continue to have top management commitment throughout 2021 and beyond as we re-enforce a culture of ethics at all levels in Atos

Atos culture of integrity



Alexandre Menais,
Group General Secretary and
Chief Compliance Officer

As Group General Secretary and Chief Compliance Officer, I want to ensure that a culture of compliance permeates through the whole organization. We have a commitment from top management to establish a culture of integrity, ethics and compliance, but this is not enough: we expect every department and every employee, as well as third parties who work on behalf of Atos, to make this a living process, taking account of compliance risks in how we operate on a daily basis.

This is key to our *Raison d'Être*, which includes the statement: "Across the world, we enable our customers, employees and collaborators, and members of societies at large to live, work and develop sustainably and confidently in the information technology space." This sustainability and confidence are predicated on strong foundations of ethics and compliance. Our expertise enables us to ensure that high ethical standards are built into our technology and digital innovation, in effect, 'ethics by design'.

The commitment from management also supports our Alert System, which makes the possibility of confidentially raising compliance alerts available not only to employees, but to external parties if they have concerns that the law or ethical principles are being broken.

High standards of ethics and compliance are not only core to the operation of Atos, but a competitive advantage valued by the business.

In the 2020 Compliance Review you will find information on key compliance topics and initiatives Atos is taking. We continue to develop compliance at Atos, both through pro-active prevention measures to avoid breaches, and through detection management so that breaches can be corrected, and lessons learnt from alerts and risks identified, through our continuous improvement cycle of risk identification, prevention, control and management

2020 in brief



Camille Porgès,
Group Head of Ethics and
Compliance

Compliance is a company-wide endeavor, and our successful implementation of a compliance culture with effective controls depends on working across the whole organization. Our specialist Global Compliance Team works collaboratively with Legal, Group Internal Audit, Group Internal Control, Global HR and the operational units across the business in all geographies.

In 2020 we have implemented a series of improvement projects to further strengthen our compliance program and governance.

A key part of working together across Atos is the network of Compliance Officers we have across the world, to implement global compliance initiatives and to drive improvement locally. We have continued to develop compliance initiatives at a global level for roll out by the Compliance Officers. The approach is collaborative, and many of the Global Compliance projects and tools originated from best practice shared by local Compliance Officers.

The strength of our compliance structure designed to have different layers ensuring depth or coverage, and our technical strength and existing ways of working with our global network ensured our agility during the COVID-19 crisis.

Some key highlights of 2020 included:

- Revising the Group Code of Ethics to reflect the Atos' Sense of Purpose (Raison d'Être) and in order to introduce new sections to highlight the growing importance of topics such as inclusion in the workplace, human rights, data protection and the environment
- Redesigning the Corruption Risk Mapping process in co-operation with the Global Internal Control and Risk Management team to improve and align it with the Enterprise Risk Management process
- Formalizing antitrust guidelines to further educate employees and ensure compliance with competition law
- New communication initiatives, and the great opportunity of the UN Anti-Corruption Day for focusing on this vital topic

We should not forget the role of all the managers and employees in Atos and their contribution to compliance every day. By observing the Code of Ethics and the internal policies in their everyday operational activities, they have help us to make certain that Atos business is conducted ethically and according to the highest standards, and by raising alerts, they help keep Atos safe and ensure issues are managed.

In the 2020 Compliance Review you will be able to read about the work of the global and local compliance organization during 2020. There are interviews with Compliance Officers demonstrating how these topics are managed locally as well as globally and showcasing some of the excellent work which is done in the business units, countries and group functions, and by the teams such as Global Internal Control and Risk Management, and Group Internal Audit whose valuable expertise has made a significant contribution to supporting compliance at Atos.



Atos compliance organization

Atos compliance organization: a combination of global and local strengths

Atos has implemented a multi-layered compliance organization to ensure compliance is fully implemented across the organization. The following section explains the role of all those involved in compliance management. In addition, all employees have a key role to play in following Atos guidance, policies and procedures and using the compliance tools such as the Gifts and Invitations and Business Partner Checking tools which are designed to ensure the organization operates in a compliant and ethical manner. Employees also support compliance by reporting via the alerts system any situation where they feel concerned.

Atos Board of Directors

Global Compliance reports to the Board at least annually through a report which is formally presented to them by the Group General Secretary and Chief Compliance Officer. The Atos Board notably approves updated versions of the Code of Ethics which sets out Atos' ethical framework.

The Board has appointed independent and highly expert external professionals to provide advice to the Group on compliance issues requiring ethical judgements. The Ethics Advisory Committee (Comité des Déontologues) meets as often as necessary when the importance, sensitivity or difficulty of a topic so requires. This Committee reports to the Board on any matters where they have been consulted by the Group General Secretary and Chief Compliance Officer.

CEOs

Local CEOs are responsible for implementing compliance initiatives within their organizations. They defend and promote the Atos Group values, leading by example in terms of business integrity. They are also responsible for appointing a Compliance Officer within their scope, and with the support of their Compliance Officer, ensuring that all compliance initiatives are fully implemented within their entities, and that all employees know and respect the Atos Code of Ethics.

As the Atos organization evolves as part of the Spring initiative to drive profitable growth by focusing the organization on industries and clients, the compliance organization will likewise evolve. There will remain a key focus on compliance at a country level, however this will in future be supplemented by Compliance Officers for the industries as defined in the Spring Organization.

Group Management Committee

The Atos Group Management Committee determines the direction and priorities of ethics and compliance at Atos. Compliance is part of the Risk Management Process, to manage the overall risks facing the Group. The Group Management Committee monitors progress on managing compliance risks with a quarterly report from the Group General Secretary and Chief Compliance Officer.

General Counsels

The General Counsels provide legal advice to the CEO and management teams and work closely with the Compliance Officers at a local level to ensure that legal and contract management aspect of compliance are fully covered. They also give legal advice to support compliance investigations.

Interview



Harish Nambiar
General Counsel Atos Syntel and
General Counsel Atos India

Compliance is closely related to law. In fact, it is one of the best examples of applied law in action. From that point of view, it is only natural that attorneys take an active part in Compliance activities. As a General Counsel, I enjoy supporting and contributing to Compliance activities. This has a number of benefits: compliance is, in fact, a part of legal activity; General Counsels need to have a bird's eye view of compliance status of the organization; and legal forms part of the control and risk management functions that should ensure that the organization is not exposed to unwanted and avoidable risks.

Since in compliance a clear 'yes' or 'no' answer is possible on most topics, effective forewarning, management and mitigation of compliance risks can prevent serious issues arising at a later date. This is made possible by timely actions and regular communications. A General Counsel who knows about a potential compliance risk can really intervene at the right time to ensure that the risk is mitigated by ensuring adequate compliance and/or remedial actions. A timely legal review of an item can ensure it is dealt with correctly.

As a General Counsel, I feel that my legal expertise can be used to great benefit to support the organization and this forms the basis of all the collaboration between Legal and Compliance functions. Since the convergence point for both is law, adequate support and interest from General Counsels for the compliance function goes a long way in ensuring that the organization gets the maximum benefit on all the counts.



Global Compliance Team

On a day to day basis, Atos Compliance activity is led by the Global Compliance Team that defines Atos compliance strategy, supports local Compliance Officers, leads or supports global investigations, consolidates and ensures global consistency of Atos compliance activities, and ensures that compliance initiatives are implemented.

The Global Compliance team co-ordinates the network of Compliance Officers, organizing the monthly meetings and agreeing compliance objectives for each compliance Officer that take account of global and local Compliance priorities.

Compliance Officers' network

A key part of the compliance team in Atos is the worldwide Compliance Officers' network. Each country cluster, division and corporate function has its own Compliance Officer, with close links to their local Management Committee. Compliance Officers define and foster practical compliance, close to business realities, and easily accessible to all employees.

They are expected to present to entities' Executive Committees on a regular basis to draw executives' attention to compliance risks and duties, raise potential issues, and support top managers in fostering a business integrity culture within their entities. Compliance Officers follow up mitigation action plans from the Corruption Risk Mapping with their local management. They also manage compliance and ethics alerts reported through the local alerts system as further explained below.

The Global Compliance Team and local Compliance Officers work as a virtual team, collaborating on projects, supporting each other and sharing knowledge and best practice.





Interview



Ester Muñoz Zamora
Compliance Officer, Iberia

As Compliance Officer for Iberia, I organize a Compliance Committee every month. The Committee is made up of the Leadership Team in Iberia. This Committee is key for managing compliance in Iberia, ensuring that compliance topics are given attention at the most senior level in the organization. The meetings also allow senior management to be fully aware and regularly informed about the compliance situation at Group level, ensuring full alignment between global and local compliance initiatives.

During the meeting I present most recent updates about compliance. Legal and data protection team are part of the Committee too, due to the connection between these different subjects. The agenda includes the Group Compliance news and the implementation of the policies and tools in Iberia. Additionally, the timetable with the planned actions are explained and the aspects that need more pushing from management side. To ensure that the senior team is fully updated on compliance there may be a training session done on compliance topics that are particularly relevant at the time.

From my point of view the Committee is not only to share the news about compliance matters, it is focused on finding solutions, and ensuring that the Compliance program is truly management led.

I would like to remark, that the involvement and commitment of our CEO, COO and the Excom members is key to push all the compliance initiatives in Iberia.



Adalton Pereira Cardoso
Compliance Officer, South America

I was appointed Compliance Officers for South America in July 2020. I am based in Brazil and also work as Head of Procurement for South America.

In Atos South America we are able to demonstrate the benefits of having an effective compliance program in place, all parties involved in the business (employees, partners, subcontractors, etc.) are aware and following the ethics rules. The Compliance area is very important to guarantee the good reputation and credibility of the company.

An effective compliance team working locally in the business is crucial for training employees, and to ensure all parts of the organization understand the compliance rules and follow the necessary process. I work with the South America Management Team to ensure they set the correct tone from the top. I also support bid teams to ensure the necessary checks are done, and review and approve third parties. Of course, in my day to day work as Head of Procurement for South America I am in a very good position to enforce compliance priorities with our suppliers.

Having taken on the role of Compliance Officer, I have been very pleased with the response from Atos employees in South America. They are aligned with the need to follow the Compliance rules, and are always asking for help if ever doubt. The participation of employees is really positive.



Interview



Mauro Correa Cruz Neto

Compliance Officer, North America

In June 2020 I was appointed as the new Compliance Officer for North America and my first and most important priority was to ensure that our employees were following Atos policies in order to ensure Compliance with applicable laws and in line with best ethical principles.

The strategy adopted was divided in three different dimensions:

1. Maturity Assessment

Being new in role meant I could be 'a fresh pair of eyes' when evaluating the attributes of the local processes and how they were contributing to the overall success of the Compliance control objectives. This exercise was done in partnership with different departments and helped identify continuous opportunities for improvements for our region, in order to take the Compliance Program in North America to the next level.

2. Executive Engagement

To further enhance the involvement of key executive sponsors and agree the right governance strategy was the second success element for our region, their engagement and role model (setting the tone from the top) helped business units to enhance communications, thereby increasing collaboration and support, boosting project success rates, and reducing collective risk.

3. Delivery in line with strategy

The last but not least dimension was the execution in alignment with the strategy defined. As Larry Bossidy and Ram Charan in their book Execution: The Discipline of Getting Things Done, said the key to proper execution lies in three core areas: people, strategy and operations. "The people process is more important than either the strategy or operations processes," they wrote. "After all, it's the people of an organization who make judgments about how markets are changing, create strategies based on those judgments, and translate the strategies into operational realities."

Being able to identify the right key stakeholders their interest and level of influence, as well as getting into a proper ground of action plan and being able to execute it fully were the three most relevant ingredients for the North America Compliance Program to be taken to the next level of success.



Atos Compliance Program

Atos Compliance Program: 2020 achievements and highlights



The starting point for managing compliance is an understanding of the risks, this is the cornerstone on which Atos Compliance Program is built. Our initiatives in compliance are based around the highest risks we face, taking into account the severity of impact, likelihood of occurrence and mitigation effectiveness. The scope of Atos' Compliance Program covers the following principle categories of compliance risks: 1) Anti-corruption, 2) Sanctions and Export Control, 3) Antitrust, 4) Human Rights in the context of the duty of vigilance. For each of these risks a common four-stage risk management cycle is used:

The following section of this review contains information about the steps we have taken in 2020 to identify and assess risk, prevent compliance risks, and the control measures we have put in place and how we monitor risks on an ongoing basis.



Identification and assessment of risks

Corruption Risk Mapping



In 2020, Atos revised the methodology used to build its Corruption Risk Mapping. It was re-designed in line with the Enterprise Risk Management methodology, in order to identify and address corruption and influence peddling risks using a process that mirrors the Group strategic risk mapping.

This exercise covered the whole Group across all functions and geographies, while allowing the level of granularity to be adjusted locally. This refined method enables the identification of risks as well as points of attention, making it possible to strengthen the prevention measures. More than 150 managers, selected in consideration of their role or involvement in key processes throughout the Group, were invited to

provide their perception of the risk from their point of view. This depth of coverage ensured that multiple viewpoints were provided ensuring risks were captured wherever in the organization they might be embedded. Then several workshops were organized to ensure consistency of quantitative and qualitative information from a fully integrated perspective.

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

Assessing compliance risk in M&A deals

The M&A and Compliance teams collaborate closely from the due diligence phase to adequately identify and mitigate any compliance risk and better integrate the newly acquired entities.



Interview



Anne-Sophie Poirier

Head of Legal Mergers and Acquisitions

I work closely with the Global Compliance Team on the identification and management of compliance risks in the very early stage of M&A transactions. Together we have developed a set of tools like due diligence questionnaires and roadmaps and organized training sessions on Compliance topics of interest for the M&A community.

Attention is essentially paid at a pre-acquisition stage to the following topics:

- Management team and shareholders checks,
- Scope of the countries involved and consequently better understanding and anticipation of the local and cultural risk environment as well as applicable laws/regulations,
- Customers or suppliers,
- Go to market, which means in particular any relationships with third parties and agents looking at commissions, payments and irregularities
- Relationship with governmental authorities and public officials and
- Existing Compliance programs or policies.

Attention is also paid, post-acquisition, to effectively integrating the newly acquired entities. Together with the Global Compliance and Group Data Protection teams, Legal M&A have prepared an integration deck to ensure full onboarding of newly acquired companies in both Compliance and Data Protection programs. The collaboration facilitates the implementation of the remedies to the risks identified during the due diligence process as well as the implementation of the compliance integration program which is therefore better scoped as from day one.

Prevention of risks

Code of Ethics and Global Ethics and Compliance Policy revision



The Atos Code of Ethics is the key document which sets out Atos ethical standards. Like all aspects of the Compliance Program, it is reviewed as necessary by the Global Compliance team to ensure that it remains up-to-date and in line with best practice in the market.

During 2020, a thorough review of the Code of Ethics was carried out. This involved formalizing the Atos' Sense of Purpose (Raison d'être) approved at the Atos 2019 Annual General Meeting, and consulting the Ethics Advisory Committee (the Collège des Déontologues). In addition, the Global Compliance Team consulted extensively with internal stakeholders such as Global Human Resources, Data Protection, and Corporate Social Responsibility. As a result of this review, a revised version has been prepared, which as of the date of this report, is in the course of information and consultation in line with Atos Social Processes.

It is anticipated that the new version will be

formally launched to all employees in the first half of 2021, subject to social processes being completed. A communication and training plan is being developed to ensure that all employees are aware of and understand the latest version of the Code of Ethics.

The Global Ethics and Compliance Policy is the internal document which supplements the Code of Ethics. It is in effect an operational guide for all Atos employees. It is regularly updated and in 2020 the Global Compliance Team sought input from the Compliance Officers Network as well as the General Counsels as part of this review. Whilst available to all employees it is primarily aimed at Managers who have responsibility for Compliance, General Counsels, and Compliance Officers. The Global Ethics and Compliance Policy covers in detail who is responsible for each aspect of compliance and where to find more information about compliance topics. The policy has an all-in-one approach with links to key compliance documents and resources.

Training



Training is part of Atos ethical approach. An organization is the sum of what employees individually achieve. This is why we strongly believe in the importance of training our employees to amplify their strengths and fill in their weaknesses, to develop new skills which ultimately allows the company to operate in a sustainable manner.

For employees...

Having an e-learning of the Code of Ethics is mandatory for all Atos employees and enables consistency in the knowledge of Atos Compliance and ethics standards. The training provides an understanding of what ethical behavior is and how to apply it on a daily basis, with particular emphasis on the fight against corruption, and sets as a fundamental principle its ethical ambition.

As part of its zero-tolerance policy, Atos is reinforcing its anti-corruption program with specific e-learning for exposed employees working in operations.

...and managers

Atos has set up a mandatory face-to-face training course for managers, ETOs Tier One Organization, covering the subjects of the code of ethics in a reinforced way around practical scenarios. The objective is to help managers make ethical decisions in a context of operational and time constraints.

Compliance Officers

In addition, a specific induction program has been put in place to train all local Compliance Officers in the Atos Compliance Program (anti-corruption, conflict of interest, antitrust, international sanctions, third party due diligence).

Communication



Excellent communication is key to an effective compliance program. During 2020, an internal communication plan was developed, in cooperation with the Internal Communications team.

Key communications highlights during 2020 were:

- The introduction of a Monthly News Bulletin for the management teams in every part of the organization globally. This newsletter is written by the Global Compliance team and is a mixture of internal compliance news and campaigns, has a monthly theme and a selection of compliance news external to Atos but of relevance and interest to senior managers. It is attractively designed with a navigable format.
- UN Anti-Corruption Day was an opportunity to remind employees of the importance of Compliance. The Group General Secretary and Chief Compliance Officer made a short video which was sent to all employees, explaining the value Atos places on doing business ethically. In addition, the CEOs of the business units sent messages to their employees reminding them of the zero tolerance policy towards all types of corruption and insisting on the need to follow rules and operating procedures that are designed to ensure Atos conducts its business ethically. A quiz on the intranet homepage was used to raise awareness of anti-corruption topics such as gifts

and invitations. The high participation rate showed very good engagement from the employees.

- Compliance Officers have also run local communication campaigns and initiatives based on local needs and priorities, for example communicating in the lead up to key festivals like Christmas, Diwali and the Chinese New Year, about the need to ensure that giving and receiving gifts and invitations is appropriate and approved in line with guidance.

A common challenge for compliance in all organizations is to create awareness within the organization on the importance of compliance topics and integrity. That's why it is so important to communicate on a regular basis with the business colleagues and make them aware of the increased importance of Compliance for our daily business operations. For that reason, in addition to the usual means of communication, in H1 2020 within Atos's Circuit communication tool a special BTN Compliance & Governance space has been set up, to particularly inform senior managers about several Compliance matters, for example competition law, ethics, fraud, export controls, international sanctions, gifts and invitations. It is updated regularly with announcements and news.



Interview



Natalia Dariva

Global Internal Communications Manager

Internal Communications has a strategic role for the business to help align the values and goals across the whole of Atos. Compliance is a strong part of our identity at Atos, and we have supported the Compliance team in developing a communication plan for 2020 to help engage all employees. The aim of the plan was to ensure that everyone understands the importance of Compliance and the role they need to fill individually to support this.

The COVID-19 situation in 2020 has meant we needed to change how we communicate, to catch people's attention in a situation where the majority of employees worldwide have been working remotely. Ideas such as the video from the Chief Compliance Officer to mark the UN Anti-corruption day in December was a successful example of this. The daily quiz was an innovative way of creating awareness, engaging employees and sending a serious message at the same time.

We will continue to work together with the Global Compliance Team in 2021 to develop new ways of engaging all colleagues to make sure everyone is equally committed to compliance.



Third party due diligence

As part of the continuous improvement of all parts of the Compliance Program, a focus in 2020 has been on third party due diligence. This has involved firstly developing greater global consistency of the evaluation factors and secondly improving effectiveness of each due diligence process (clients, suppliers and business partners) by refining the design based on experience.

As a first step, the 'Countries at Risk assessment' is comprehensively reviewed on a regular basis, ensuring that the level of compliance sign-off required is always in line with the latest developments likely to impact the country risk level.

In order to ensure the continuous improvement of each process, a review has been carried out with each process' key stakeholders to ensure learning is captured. For business partners this has involved a cooperation with Group Internal Control and seeking feedback for the Compliance Officers and General Counsels for all countries, to revise the internal policy and adjust the dedicated tool usage. The purpose of this revision was in order to monitor the risks as closely as possible and have the most in-depth understanding of the risks to make sure the process is finely adjusted for the purpose of monitoring risk associated with Business Partners.

Antitrust guidelines

In 2020, the Group Compliance department formalized Antitrust Compliance Guidelines, to reemphasize to the importance for Atos' employees to adopt the right behavior to comply with antitrust law when participating in meetings within professional associations, trade associations or working groups. This document details the main rules to be applied by the operational staff in order to avoid any risk of anti-competitive practices when participating to such meetings. Particular attention is given to the avoiding accidental exchange of commercially sensitive information, which is prohibited between competitors and can lead to heavy fines.

Available on the Group's intranet, these Antitrust Guidelines are part of the Group's overall risk prevention strategy. Moreover, the Group Compliance department issues case by case guidance to the business, in the event of a joint venture project and similar corporate transactions. It ensures that competition law implications are fully considered as part of the decision-making process and that steps are taken to review these decisions on a regular basis.





Because of its global operations, development projects and partnerships with public and private sector organizations, the Atos Group is very mindful of abiding by international sanctions and embargoes and abiding by all export control regulations.

2020 has been an important year for export controls and sanctions, with many new regulations and policies from the US and also the EU. In a fast-changing political and regulatory environment, especially within the US Administration during an electoral period, and the international pressures resulting from the COVID-19 crisis, preparedness and commitment to ensure compliance has been vital to ensure the protection of Atos's interests and ongoing compliance.

Atos has implemented the following measures in 2020 to further strengthen its trade compliance procedures:

- Revised Countries at Risk assessment process covering both international sanctions and corruption risk. This has increased the number of countries where deals need to be pre-approved by the Compliance Officer or by Global Compliance
- Guidance memos regarding business relationships with other organizations to take account of changing sanctions and export control rules
- Reassessed and re-enforced standard contractual clauses relating to compliance and export control
- Extended the export control organization due to the increasing complexity of the regulatory environment

It is likely that 2021 will be a continuation of last year, with ongoing tensions between multiple countries and as a consequence, sanctions and export control regulations increasingly used for political reasons.

Detection measures

Accounting controls

As part of the continuous improvement plans, a task force was set up in mid-2020 to conduct an in-depth review of the Anticorruption Accounting Controls. The Task Force is led by Group Finance and includes Group Compliance, Group Internal Audit and Control, and the Group Finance Internal Control Manager to ensure 360° review of anticorruption related accounting controls.

The Task Force has reviewed the effectiveness of the controls relating to types of expenditure where a risk of corruption may exist, according to the guidelines published by the Agence Française Anti-corruption, for example payments relating to fees and commissions, donations, sponsorship, marketing and representation expenses, invitations, gifts or other gratuities. As well as reviewing and testing the efficacy of such controls, the Task Force also assessed the tooling to see if further automation could benefit the business.

The action plan resulting from the Task Force review was presented to the Group CFO, and will start being implemented in 2021.



Alert system

Atos has implemented a Group Alert System which is a key part of the Atos' compliance program, referred to as such in the Code of Ethics. The Group Alert System provides all Atos employees with the possibility of raising an alert if they think that a law, regulation, or one of the principles set out in our 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 the Group.

The Group Alert System is key to ensure that compliance issues are investigated and dealt with effectively, so that Atos, its operations and stakeholders are protected from corruption or any form of unethical behavior. It is vital that employees can raise issues and concerns safe in the knowledge that this will be treated with strict confidentiality and that they will be protected from retaliation, as long as they reported in good faith and selflessly.

The importance of the alerts goes beyond dealing with the immediate issues raised in an individual alert. By reviewing the cases raised

and any findings from investigations, we are able to learn as an organization. The alerts provide valuable information about our risks and where we need to educate employees and ensure appropriate controls are in place.

Alert system
Speak up to voice your concerns

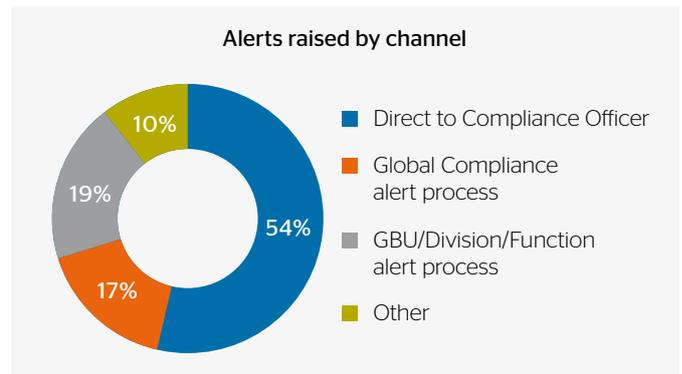
Analysis of 2020 Compliance alerts

This section contains an overall summary of the alerts received. The statistics include local and global alerts, including those on topics which are outside the direct scope of the Compliance team, as long as the issue was raised in 2020 and reported to local Compliance Officers or using the Alert System. For the avoidance of doubt, it excludes alerts raised before 2020, but still ongoing into 2020.

Overall, the number of alerts in 2020 is substantially lower than in 2019, but nonetheless a significant increase on years prior to 2019. There were 78 alerts received in 2020, compared to 120 in 2019 and 51 in 2018.

Employees most often raised alerts directly with their local Compliance Officer (54%) or using the local Alert System (19%), suggesting that local Compliance is well known and trusted in its areas of responsibility. 17% of the complaints were raised through the Global Alert System, and a small number of complaints were raised via other channels

There were alerts in 2020 from all Regional Business Units, suggesting that the process is well deployed and that employees know how to seek help if they are concerned about Compliance matters.



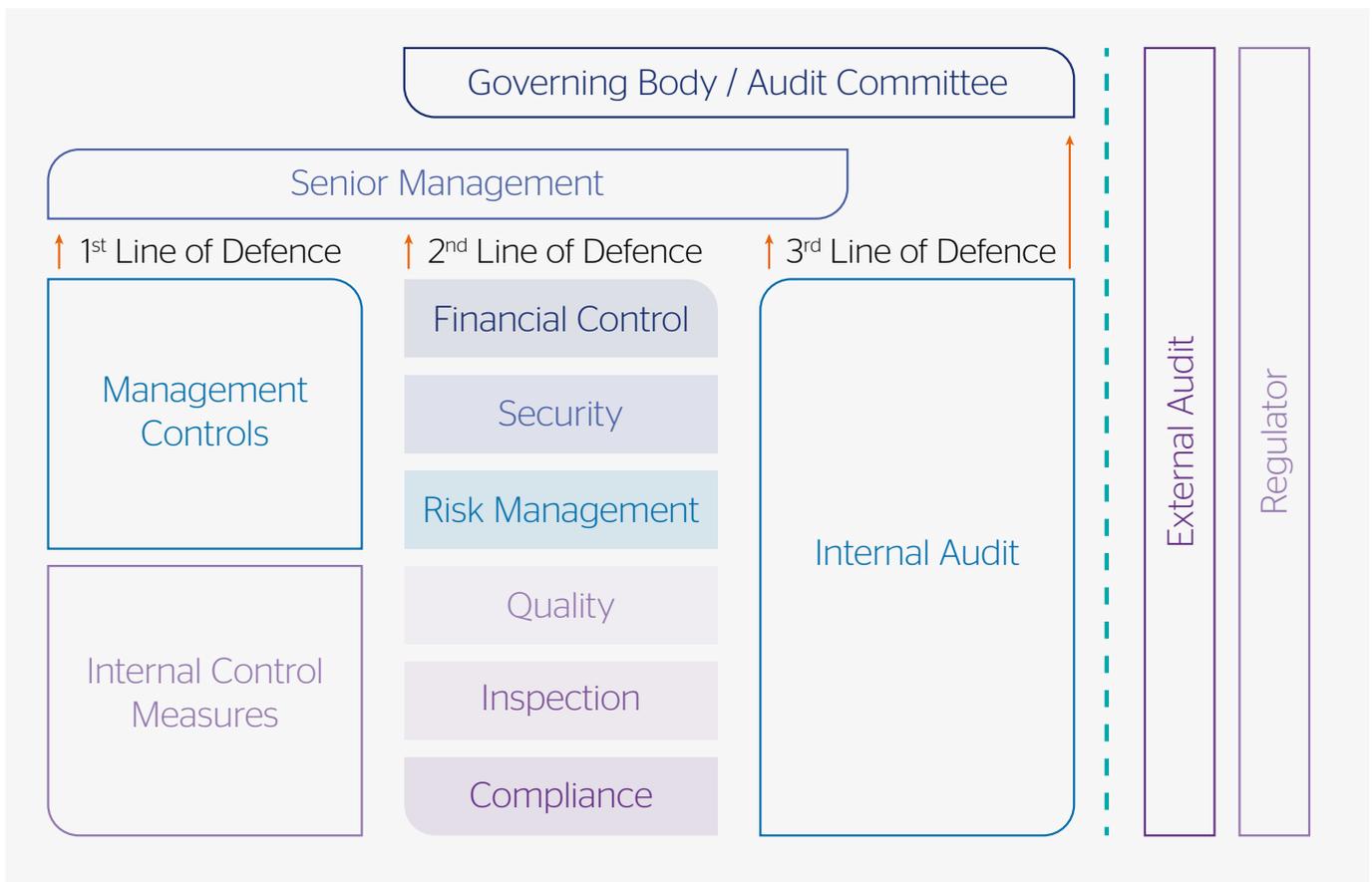
The pattern of cases identified will be used to inform our compliance risk assessment and communication efforts, as well as working with other parts of the organization to ensure that cases are raised, managed, and investigated if necessary, in the optimal part of the business for the required expertise.



Control measures

In all its operations, Atos operates a three-tier control system. The first level of control is the local management controls, second level includes formal controls carried out by a department that is operationally distinct to ensure that first-level controls have been properly carried out, and the third level of control is performed by Group Internal Audit. The role of the Global Compliance is focused on second level controls.

The three levels of control implemented by Atos:



Key to this system are the internal control measures which are described in the Atos Book of Internal Control (BIC), a mandatory framework that lists the internal control activities that must be implemented throughout the group. It is reviewed on a continuous basis.

Compliance controls in the BIC have been a key area of focus this year. First, the design of such controls has been reviewed as part of a fruitful cooperation between Group Compliance and Group Internal Control. The effectiveness was also tested through a Group wide control testing campaign. Further to this campaign, corrective actions have been taken with management to ensure improved effectiveness and follow-up upon.

To reinforce second level controls, reporting from local Compliance Officers to the Group Compliance team has been strengthened and further governance has been introduced during 2020 to ensure the right involvement of all stakeholders and consistency in dealing with compliance throughout the Group.

Monitoring

Continuous learning



Interview



Martina Buchvald
Internal Audit Director, Support Functions

What is the role of Atos Group Internal Audit when it comes to compliance?

Compliance at Atos is an integral part of good corporate governance. As the third level control in the three lines of defence model for governance and risk management, Atos Group Internal Audit provides independent assurance over the adequacy and effectiveness of the Group's internal control system, including compliance processes.

How did Atos Group Internal Audit address Compliance in 2020?

Throughout the year, Group Internal Audit executed a variety of audit engagements defined in its annual audit plan, validated by the Group Management Committee and Audit Committee.

The engagements performed over compliance are tailored to the needs of the organization following a rigorous risk assessment. In 2020, the internal audit teams were engaged in:

- Global transversal process reviews (including program reviews in response to the introduction of recent or amended laws and regulations such as the French anti-corruption law)
- Testing of internal control system effectiveness on local (entity) level including for instance monitoring on Code of Ethics and third-party due diligence;
- Investigations of alleged breaches of the global ethics and Compliance policy

How does the work of Group Internal Audit support continuous improvement?

Through the engagements and the subsequent follow up of the implementation of action plans, Group Internal Audit contributes to the continuous learning and improvement of compliance processes across the organization.

Who guards the guardians?

In its practice, the function applies high professional and ethical standards framed by the Institute of Internal Auditors, the conformance to which is certified by an external body on an annual basis.



Duty of vigilance approach

To see the full vigilance plan please refer to the [Universal Registration Document Section 5.4.7](#)



In France, the Duty of Vigilance Act establishes a legal obligation of prudent and diligent behavior relating to 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.

This Duty of Vigilance involves establishing, implementing and publishing "reasonable vigilance measures to identify, assess and report on the risks and to prevent serious human rights abuses, and fundamental freedoms, the health and safety of persons and the environment".

Such vigilance measures include, but are not limited to, risk mapping, evaluation procedures, mitigation actions, an alert mechanism and a monitoring system.

They shall apply to all Group entities, as well as all sub-contractors and suppliers with whom an established business relationship is maintained.

The measures must be formalized in a Vigilance Plan or "Plan de Vigilance", made available to the public.

Atos has developed and formalized in the Universal Registration Document an effective vigilance plan to mitigate breaches to human rights, health and safety and the environment, for its own business and throughout its supply chain.

In 2020, Atos revised the methodology and approach to the Plan de Vigilance to take this to the next level maturity. The aim of this review was to improve effectiveness, governance and ongoing monitoring of the Plan de Vigilance.

This process involved full coordination of key stakeholders directly involved in the prevention and mitigation of the risks covered under the Duty of Vigilance law including the Group CSR, HR, Security, Legal and Compliance and Procurement functions. As a result, all actions and contributions now form part of a unified and improved program, which is further detailed in Section 4.4.7 of the 2020 Universal Registration Document.

Where to find further information about compliance at Atos

Further information about compliance at Atos can be found in the following corporate publications:

- Ethics & Governance page of the Atos website
<https://atos.net/en/about-us/corporate-responsibility-and-sustainability/ethics>
- CSR page of the Atos website to access the Integrated report
<https://atos.net/en/about-us/corporate-responsibility-and-sustainability>
- Investors' page of the Atos website to access the Universal Registration Document
<https://atos.net/en/investors/financial-information/financial-reports>

About Atos

Atos is a global leader in digital transformation with 110,000 employees and annual revenue of € 12 billion. European number one in cybersecurity, cloud and high performance computing, the group provides tailored end-to-end solutions for all industries in 73 countries. A pioneer in decarbonization services and products, Atos is committed to a secure and decarbonized digital for its clients. Atos operates under the brands Atos and Atos|Syntel. 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 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.

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Let's start a discussion together

