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# Atos

# Modern Slavery Statement

(Syntel Europe Limited)

For year Ended 31<sup>st</sup> December 2021.

## Introduction

This statement has been published in accordance with the **Modern Slavery Act 2015**. It sets out the steps that **Syntel Europe Limited** (herein referred to as “**Atos**” or “Company”) has its headquarter in London have taken during the year ending **31<sup>st</sup> December 2021** to ensure that slavery and human trafficking are not taking place in their supply chains and in any parts of their business.

Syntel Europe Limited is part of the Atos Group. Atos is a global leader in digital transformation with 107,000 employees and annual revenue of over € 11 billion. European number one in cybersecurity, cloud and high- performance computing the Group provides tailored end-to-end solutions for all industries in 71 countries. A pioneer in decarbonization services and products, Atos is committed to a secure and decarbonized digital for its clients. Atos is a SE (Societas Europaea) listed on Euronext Paris and included on the CAC 40 ESG and Next 20 Paris Stock Indexes.

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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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 Company is proud to integrate within its 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 accordance to the Modern Slavery Act'2015 we have been complying with its requirements, further we have our statements published on our website on a timely basis. During these years "Syntel Europe Limited" "Atos" "Company" has been proactive in ensuring various steps are implement towards ensuring compliance with aspect of Modern Slavery with regards to amending our suppliers, contractor, sub-contractor terms and having required changes made to our Code of Ethics to include references to modern slavery and its Policy.

We have developed a customized training for all employees, contractor/ sub-contractor (staff aligned to projects) to help them understand how to identify risks and raise concerns about potential modern slavery offences, 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**

"Syntel Europe Limited" has presence in UK and Ireland. It represents approximately 1.1% of total Atos revenue. Company has been providing technology and business services to customers since 1997. Our Europe & UK operations have more than doubled over the past five years and we provide services to 20 organizations across Europe. Syntel Europe Limited has an annual turnover of approximately 118 million Euros

### **Policies - Code of Conduct and Ethics**

Atos has timely amended policies which reflects our commitment to acting ethically and with utmost integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure that slavery and human trafficking does not take place anywhere in our company premises or supply chains.

As a Company's code of ethics plays a very important role in helping to set the culture of the organization and importantly, it sets the expectation of conduct and behavior within the workplace.

Company is committed to create a healthy working environment for all employees. We apply the highest standards of professional integrity internally and with its third parties, without consideration to race, colour, age, national origin, religion, disability, sexual preference etc.

Company has zero tolerance and condemns any forms of slavery i.e. Child labor/forced labor/Trafficking/coercion etc. We believe that business can only flourish where human rights are protected and respected. We recognise that business has the responsibility to respect human rights and the ability to contribute towards positive human rights will have long lasting positive impact on the society.

All Employees, contractor/ sub-contractor (staff aligned to projects) joining the Company are required to mandatorily complete the Compliance module, which covers Code of ethics inclusive of Human Rights and other trainings which are devised around the same.

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Company has amended its policies to create even more emphasis on human rights, with express references made to the fact that Company rejects human trafficking and all forms of human slavery

### **Vendor Contract Agreements**

Atos has started a process of inserting a clause in every contract with a partner that entitles Company to terminate the business relationship without penalty if the partner or its subcontractors is engaging in human rights violation related activities.

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 Company does not tolerate any discrimination, harassment or violence of any kind in the workplace.

Therefore, all required necessary measures are taken to prevent discrimination, harassment, physical violence and psychological abuse within their entities are implemented across.

### **Code of Conduct and Ethics for Relationships with Suppliers**

In addition to the Code of Ethics which is the backbone of Company's corporate culture, employees who perform procurement related activities on behalf of Company or who have regular contact 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 Ethics clearly states Company's 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.

### **Supply Chain Standards**

Company's 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 Company's contractual terms and conditions.

By accepting the Business Partner's Commitment to Integrity, each supplier also recognizes Company's 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.

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The Company's 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.

### **Incident Reporting**

Atos maintains an incident reporting system to enable employees to report non-routine events and activities that call into the question of compliance with ethical standards. Such events include but are not limited to accounting or audit complaints or concerns, unfair labour practice, discrimination, harassment, customer mistreatment, unsafe work conditions, theft, fraud, embezzlement, waste of time or resources, compliance and regulation violations, auditing matters, corporate scandals, or other ethical violations.

This system is designed to enable the reporting of any incident observed within the Company or Supplier Chain

### **Risk Assessment and Due diligence in Relation to Slavery and Human Trafficking.**

Atos undertakes due diligence when considering onboarding new suppliers, and regularly reviews its existing suppliers.

As part of our initiative to identify and mitigate risk: -

- We insist, in our agreements, that our suppliers comply with local laws and ensure that they do not indulge in child labor or forced labor practices.
- We build long-standing relationships with local suppliers and make clear our expectations of business behavior.

We have in place systems to encourage the reporting of concerns and reported to Atos.

### **Grievance Mechanism & Trainings**

We have 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.

We have clearly stated our commitment to tackling modern slavery and we have created and communicated through frequent emailers towards awareness of the same.

### **Trainings**

The Code of Ethics Policy has formed part of our Mandatory trainings. All employees, regardless of their position, to complete are required to complete e-learning module that explains the principles of the Code of Ethics and asserts our commitment to comply with the Modern Slavery Act 2015.

Further new joiners are required to mandatorily have these trainings completed first in our internal portals to have unrestricted access.

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Periodic communication reiterating Company's Code of Conduct and Ethics policy is released to Atos Global employees, resulting in better awareness towards Modern Slavery aspects.

The latest report shows that more than 90% employees in the United Kingdom have been trained to the Code of Ethics as on date. Further awareness training is conducted on annual basis across all Global employees in Atos.

### **Closing Statement**

Syntel Europe Limited understands 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, Company intends to continue to put those risks at the heart of next year's modern slavery statement and its efforts towards excellence in corporate standards and responsibility.

The Board of Directors of Syntel Europe Limited has approved this statement

For **Syntel Europe Limited**



**Rakesh Khanna**  
**Director**

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### About Atos

Atos is the global leader in secure and decarbonized digital with a range of market-leading digital solutions along with consultancy services, digital security and decarbonization offerings; an end-to-end partnership approach.

A net-zero pioneer in decarbonization services and products, our commitment to the future extends to carbon-neutrality for our organization as well as our clients and partners. Together, we're a force pushing the boundaries of scientific and technological excellence to ensure that everyone can live, work and thrive sustainably in a secure information space.

For More details kindly visit our website: [www.atos.net](http://www.atos.net)