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As Chairman of the Board of Directors, I am delighted to introduce the 2022 Annual Compliance Review.

Our Code of Ethics states clearly that ethics and compliance are key priorities for Atos, from the very top of the company to the heart of our operations. This has stayed constant throughout the changes which have been seen both within Atos and in the external geopolitical environment in 2022. The commitment from top management to the compliance program continues as strongly as ever.

2022 has been an important year for compliance at Atos, and the Annual Compliance Review illustrates to our stakeholders how we have developed this important part of our operations.

For the future, as we follow our strategy to create two independent businesses, Atos Tech Foundations and Evidian, we will strive to embed in both businesses the ethical principles which have been core to the purpose of Atos.

For me, as Senior Executive Vice President of the company, compliance is a vital enabler of on-going business success, which is inseparable from our Corporate Social Responsibility (CSR) governance: there can be no long-term sustainability without compliance.

Publishing our Annual Compliance Review externally as well as internally, thus openly sharing the initiatives taken by the Group to ensure the robustness of our compliance program, enables us to engage with our stakeholders on this important topic. I am therefore delighted to introduce our Annual Compliance Review, showing the progress that has been made during 2022.
As Group General Counsel, I consider compliance to be a core and essential part of our daily operations, as well as a competitive advantage valued by the business.

In this 2022 Compliance Review, you will read about this year’s key compliance achievements, as well as the main initiatives underway at Atos. We have continued to develop compliance at Atos, both through proactive prevention measures and through detection management.

As we prepare for the proposed separation of Atos, we have worked hard during the second half of 2022 to plan for the success of both (Atos TFCo) and Evidian (SpinCo). A vital part of this planning has been ensuring that both organizations will have a robust compliance program underpinning their future operating models from day one.
2022 in brief

To build on previous years’ work developing a culture of compliance at Atos, the focus of the Global Compliance Team in 2022 has been on embedding that culture further by training programs for all employees and by significant investment in improving monitoring and control, notably through new tooling.

A key success has been the global rollout to all employees during 2022 of the Financial Integrity training which began in North America in 2021, ensuring that compliance is seen as a truly company-wide endeavor, and that everyone within the organization understands their role in ensuring all Atos business is conducted ethically and in line with regulations. Our global network of Compliance Officers, who implement global compliance initiatives and drive improvement locally, have been key to delivering our projects in 2022. The approach is collaborative, and many of the Global Compliance projects and tools originated from best practices shared by local Compliance Officers. The local implementation of a new whistleblowing platform in all countries outside Europe (where the social processes are still in progress at the end of 2022), available both to employees and third parties, is an example of this collaborative working, improving the compliance program by facilitating the reporting of concerns and ensuring effective allocation and management of the alerts by the authorized recipients within the organization. This project is an example of not only improving the experience of employees and other stakeholders’ interactions with the Compliance experts, but also improving the management of the alerts, through effective workflows and in real-time reporting.

During 2022, the Global Compliance Team worked with the Compliance Officers to design and implement a series of important improvement projects to further strengthen Atos’s compliance program and governance.

Some key highlights of 2022 have included:

- Revision of the Group’s Corruption Risk Mapping process, to refine the granularity of the assessment, ensure full coverage in terms of business lines and geographies and anticipate the separation of the Group so that both organizations will have an adjusted and self-standing Corruption Risk Mapping.
- Investment in a market-leading screening tool and a complete revision of the compliance checking processes to improve due diligence on third parties. The implementation project was a joint effort between Global Compliance, Global Sales, Global Procurement and Atos IT, and included increased automation and integration of the new tooling with sales and procurement processes and systems.
- Investment in a new web-based whistleblowing platform, available to employees and third parties in multiple languages, implemented in all countries outside Europe with a communication campaign to ensure employees’ awareness. It will be implemented in European countries, subject to completion of the social “processes”.
- Roll-out of Financial Integrity e-learning to all employees in the Group. In 2021 this training was completed by over 9,000 employees in North America, which is 100% of the targeted population. Following the success of the training, decision has been made to request all employees globally to do the training. During 2022, 61,442 employees completed this training.
- Project to deal with the export control and sanctions decisions made by key regulatory authorities globally following the invasion of Ukraine by Russia. This project involved substantial work for the global compliance network to secure Atos business and prevent dealing with sanctioned individuals or entities, until completion of Atos’s managed exit from Russia.
- Production of guidelines and training in particular for the compliance and legal network, in the area of competition law, including a specific focus on joint tendering and on vertical relationships further to the adoption of the new EU Regulation on vertical restrictions applicable to distribution and reselling agreements.
- Regular communication which continues to be a key part of the compliance program, in particular the compliance newsletter for around 1,000 leaders across the Group, and leveraging UN Anti-Corruption Day as an opportunity to convey the message of Atos zero tolerance for corruption to our more than 100,000 employees around the world.

Beyond the contribution of the Global Compliance Team and the local Compliance Officers, the effectiveness of Atos’s compliance program also depends on all managers and employees at Atos, and their contribution to compliance every day. The manner in which they observe the Code of Ethics and the complementary internal policies and guidelines in their everyday activities, and the fact that they feel confident to report any concerns regarding potential breaches, helps ensure that Atos business is conducted in line with ethical standards.

In the 2022 Compliance Review, you can read about the achievements of the global compliance organization. You will find interviews with Compliance Officers and General Counsels showcasing some of the excellent work being done within our business units, countries and global functions, and with the employees in teams such as Sales, Procurement, Human Resources, Communications and Atos IT who have played a key role in developing the compliance program across the Group.
Atos Compliance Organization: A combination of global and local strengths

Atos has implemented a multi-layered compliance organization to ensure that compliance is embedded in every part of the business, reflecting all operational business lines and geographies. The following section explains the role of all those involved in compliance management.

Atos Board of Directors

The Atos Board of Directors is responsible for Atos's ethical framework at Group level. In his role as Chairman of the Board, Bertrand Meunier provides the foreword to the Code of Ethics, committing the Board to the Code of Ethics, which is a key building block of the compliance program, setting out Atos's commitment to ethics and the fight against corruption.

Global Compliance reports to the Board annually through a report on the progress of the compliance program, which is formally presented by the Group General Secretary and Chief Compliance Officer in the first quarter of each year. In addition, the Board receives an analysis of the alerts which were managed during the preceding year. This ensures that the Board is fully informed about the issues which were raised through the alert system and any learning for the organization.

The Chief Compliance Officer also reports on a semesterly basis to the Audit Committee and an informal communication channel exists between the Chief Compliance Officer and the Chairman of the Audit Committee.

The Ethics Advisory Body (Collège des Déontologues)

The Board has appointed a body of independent and highly expert external professionals to provide advice to the Group on compliance issues requiring ethical judgements. The Ethics Advisory Body (Collège des Déontologues) meets as often as necessary when the importance, sensitivity or difficulty of a topic so requires. In 2022, the Chief Compliance Officer sought advice from the Ethics Advisory Body on the project to revise the Global Ethics Alert System Policy, introduce an Investigation Guide and implement a new whistleblowing system. Seeking advice from the Ethics Advisory Board helped ensure that the best judgements would be made and that their views were fully considered before the final version would be presented to employee representatives.
Group Executive Board

The Group Executive Board reports to the Board of Directors and sets the direction and priorities for compliance at Atos. Compliance is an essential component of the risk management process, the objective of which is to identify, assess and prevent compliance risks.

The Chief Compliance Officer and/or the Group General Secretary, reports on the progress of the compliance program through quarterly reports and updates to the Executive Board. In 2022, these updates included improvement projects such as the re-design of the Corruption Risk Mapping process, compliance checks on third parties and the launch of the new whistleblowing platform. The Executive Board also discussed compliance communication initiatives where their support is needed to set the right tone from the top, and ensuring the take-up of mandatory compliance training by employees.

Regional Business Unit (RBU) and Country CEOs

Day to day operational responsibility for implementing compliance within the local organizations rests with the RBUs and Country CEOs. Indeed, as part of their appointment process, Company CEOs are required to sign an “Acceptance of Compliance Form” which commits them to implementing the Code of Ethics and Global Ethics and Compliance Policy in their organization.

To deliver this commitment, the Company CEOs are responsible for:

- Resourcing the compliance function within their organization, which includes approving the appointment of the Compliance Officer proposed by the General Counsel of the organization concerned before he or she is validated by the Global Compliance Team;
- Working with the Compliance Officer to implement within their organization all the directives, policies, training and tools which have been set up by the Global Compliance Team as part of the compliance program;
- Setting the right tone from the top to ensure employees within their organization are fully aware of all directives, policies, training and tools through regular internal communication initiatives.

General Counsels

The General Counsels provide legal advice to the RBU and Country CEOs and management teams, and support the Compliance Officers at a local level. General Counsels are responsible for:

- Providing Compliance Officers with legal support for the local implementation of the compliance program as needed, ensuring that local legal requirements are met;
- Ensuring compliance and export control clauses are included in commercial contracts and leading contractual negotiations;
- Supporting Compliance Officers in conducting internal investigations where needed;
- Working with Compliance Officers to provide virtual classroom training for key managers and the most exposed employees on compliance topics such as anti-corruption, fair competition, or trade regulations;
- Helping Compliance Officers convey messages to the local CEOs and management teams.
As General Counsel for South America, I oversee legal operations across the region, which includes some countries presenting a risk profile that requires particular attention when it comes to compliance topics. Compliance is therefore a key topic which must be embedded in the day-to-day work of not only the legal team, but every employee. As part of this, we collaborate closely with the Compliance Officer and the Global Compliance team. This collaboration is critical in a region where inherent compliance risks are particularly present.

One of the strengths of the Atos compliance organization is that Compliance Officers usually have an operational background. This detailed understanding of how the business operates allows them to identify risks in day-to-day operations. The complementary role of the legal department is to provide legal expertise to the local teams on the regulatory and compliance framework in the region.

An example of this co-working on local country specificities has been the work we have done on the compliance program in Argentina, which has very specific anti-corruption laws.

In 2022, together with the local Compliance Officer and HR team, we worked with Global Compliance on the local implementation of the new whistleblowing platform. Having an anonymous reporting system available in the local language is a requirement in certain countries in South America, and therefore the local implementation of this improved platform was a priority for the region.

As the General Counsel, I am also a member of the regional executive team, together with the Compliance Officer. This is an important element to ensure that strategic decisions fully take the local laws and compliance into account as a key parameter in the decision-making process.
Atos has a dedicated Global Compliance Team which leads and co-ordinates the compliance program, recommending the compliance strategy to top management and managing projects to ensure the ongoing continuous improvement of the compliance program.

The Global Compliance Team works closely with the network of local Compliance Officers in the countries and the Compliance Officers for the global functions, to ensure that compliance initiatives are implemented across the Group. There is a close day-to-day cooperation between the Global Team and the Compliance Officers.

Part of this collaborative working arrangement includes soliciting feedback from Compliance Officers and General Counsels, which is provided to the Global Compliance Team via an annual survey.

This feedback enables the Global Compliance Team to continue identifying areas of improvement in terms of the compliance program’s governance.

The worldwide Compliance Officers’ network is a key part of the compliance team at Atos. Each country cluster and global function has its own Compliance Officer, with close links to their local Management Committee. Compliance Officers define and promote practical compliance, aligned with business realities and easily accessible to all employees.

Country cluster Compliance Officers are expected to present to local management 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 each local entity.

Communication is an important part of their responsibilities, and they coordinate local compliance communication, with local management and communications teams ensuring that local needs — including the relevant languages — are considered, and that the right tone form the top is set locally. Compliance Officers also manage compliance and ethics alerts reported through the alert systems.

During 2022, many projects involved close co-operation and joint working between the Compliance Officers and the Global Compliance Team. These included the pilot and local implementation of the new whistleblowing system to ensure that it was communicated to employees and available in the necessary local languages, the completion monitoring of the Financial Integrity training, and the implementation of new enhanced third party due diligence procedures in the sales and procurement processes.

Compliance Officers provide a report to Global Compliance on a semesterly basis which includes progress updates on the various measures of the program, participation in the initiatives of the Group Compliance Team, monitoring of local actions, alerts, and any difficulties encountered.

The Global Compliance Team and local Compliance Officers are a virtual team, collaborating on projects, supporting each other, and sharing knowledge and best practices during joint monthly calls.
I was appointed as Compliance officer for MET (Middle East & Turkey) in July 2022. As Compliance officer for the region, my aim is to ensure the effective and efficient compliance of the region with the Atos Code of Ethics and all internal policies especially the Global Ethics and Compliance Policy and the Business Partners Policy which are the core of our ethics & compliance program. My role includes training the employees on compliance topics, raising awareness, assessing compliance risks from the Rainbow bid-management process for all Business partners and third parties involved and granting sign-off with appropriate mitigation actions, as appropriate. Since most of the countries in this region are identified as either “High Risk” or “Very High Risk” as per the Atos countries at risk table, it is of utmost importance to carefully go through and inspect all details while providing compliance signoffs and appropriate mitigation actions.

Before I took the position, I was aware of Atos compliance program due to my operational background in the organization but since I joined the compliance team, every day is a new learning. One of the key strengths of our compliance program is our Group compliance team’s knowledge and understanding on the compliance related issues and topics, especially on export control. As we all know US related hardware and software requires extensive export control procedures and failure to comply with them may result in penalties and other severe challenges, so it is one of the key topics to anticipate to make sure we operate in strict compliance with applicable laws and regulations.

In Atos MET, management is committed to enforce the compliance program down to every employee as they know the importance of ethics and compliance in our day-to-day jobs. Trainings are communicated by compliance officer to top management and then, using top-down approach, it is enforced to every manager to make sure that the training plan and awareness reaches down to every single employee of the region, and everyone knows that ethics is everyone's responsibility.
In my role of Global Finance Compliance Officer, I am involved in continuously improving the financial integrity part of the compliance program. I align with Group Compliance and Group Internal Audit and Internal Control on implementing and improving financial controls. For example, to align with the best standards and latest recommendations, we implemented monthly controls, followed up by the countries. These checks are fully aligned in our ERP system SAP and monthly postings done. Local Accounting responsible managers are asked to validate all system selected postings and their feedback is reviewed by the Regional Internal Control Managers.

Together with Global Compliance and Global Sales Operations we implemented an improved process for the screening of our prospects and existing customers, to ensure compliance with both anticorruption standards and international sanctions, as applicable in different countries.

Additionally, within Finance we implemented a yearly review cycle of our operational processes and controls, to avoid any discrepancies in the execution versus the policies. In the coming year we will continue to work on these aspects.
Atos Compliance Program: 2022 achievements and highlights

Atos’s compliance program is structured around a risk management approach, with interventions designed to address each part of the risk management cycle: risk identification and assessment; risk prevention, control, and ongoing monitoring.

The following section of this review covers in more detail the steps we have taken in 2022 to identify and assess risk, prevent compliance risks, improve the control measures in place, and how we monitor risks on an ongoing basis.

Identification and assessment of risks

**Corruption risk mapping**

The Corruption Risk Mapping is an at-least biennial exercise resulting from a cross-functional collaboration intended to define the actions and measures required to address corruption risks, with monitoring performed by Global Compliance and Group Internal Control. In 2022, Atos pursued its commitment to reject any form of bribery, corruption or influence peddling through the review of its Corruption Risk Mapping methodology. This review was part of the continuous improvement and enhancement of the compliance program and its alignment with the key measures of the French anticorruption law (known as “Sapin II”), as well as the recommendations of the French Anti-Corruption Agency, while taking into account the reorganization of Atos’s activities.

Accordingly, the methodology review agreed upon in 2022 aims to ensure a complete understanding of corruption risks within Atos’s business processes. A comprehensive identification and description of detailed risk scenarios has been initiated through a top-down and bottom-up approach with key internal stakeholders. The evaluation of the resulting identified risks will be revised to ensure a proper analysis of the corruption inherent risk pertaining to each identified scenario and the effectiveness of the control measures in place.

Remediation plans adapted to identified risks will be established, providing strong anti-corruption foundations to Atos’s future businesses to pursue their respective enterprises.

The Enterprise Risk Management (ERM) Department is in charge of the yearly Group risk mapping. This exercise done each year in Q1 involves interviewing through a questionnaire more than 500 managers of the Group on their perception and evaluation of the main risks for Atos.

Each year about 40 main risks are identified and hierarchized. Action plans are obviously built to manage these risks.

The results of this analysis are presented globally to the Global Executive Board and the Group Audit Committee and shared with the RBUs and Central Functions.

The ERM Department also assists other departments for their own risk mapping exercise and provides methodology, tools and support, and this is in particular the case with the Group Compliance department.

Following the anti-corruption law in France (Loi Sapin 2), Atos has to regularly perform an internal risk assessment of the anticorruption risks though risk mapping exercises and interviews. In this context, the ERM team works closely with the Group Compliance team to organize and conduct this exercise.

For the ERM Department, this is also a way to update our Group risk framework regarding the corruption risk, by reviewing the corruption scenarios built for this exercise and checking the adequation of the internal controls in place.

We as well take this opportunity to review and improve our methodology.
Training

The effectiveness of Atos’s compliance program is not only a matter for the senior management, it is in fact dependent on every employee carrying out their duties on a daily basis in line with the ethics and rules of the organization. This can only happen if employees are fully informed and have received good quality training.

This is why Atos has implemented a comprehensive compliance training program that targets different roles and needs.

Code of Ethics training

The cornerstone of the compliance program is the Atos Code of Ethics, which sets out the Group’s ethical standards and approach. Therefore there is a mandatory training which all employees across the Group, regardless of their seniority, position or location must undertake annually ensuring that the Code of Ethics remains at the front of their mind and that they are kept informed of any updates to it.

To supplement the mandatory Code of Ethics training for all employees, the Global Compliance Team have developed a training course for managers through a dedicated virtual classroom training — Ethics in a Tier One Organization School (ETO²S) — which uses a practical approach and interactive discussions to provide a thorough understanding of what ethical behavior is and how to apply it on a day-to-day basis. It is delivered by the General Counsels in each Country Cluster, supported by the local Compliance Officers.

In addition to the Code of Ethics training and as part of its zero-tolerance approach to corruption, Atos has made a specific online training available for exposed employees working in operations.

Compliance Officer Induction modules

Once appointed, each Compliance Officer receives training as part of an induction program to learn about Atos’s compliance program and their role as a new member of the Compliance Officer network. There are eight modules in total, covering topics such as anti-corruption, conflict of interest, antitrust, international sanctions, third-party due diligence and the assessment of compliance risks.

Financial integrity training

Following the successful implementation of a financial integrity e-learning course for all employees in North America during 2021, the decision was made to roll out the training for all employees in the Atos Group during 2022. The objective was to educate them on all aspects of financial integrity, teaching them how to identify red flags in order to ensure the right behavior at all levels of the organization.

This project required considerable co-operation across the world, between Global Compliance Team and local Compliance Officers, General Counsels, Learning and Development and Internal Communications teams, and the feedback on the content by the employees was very positive.
In Learning and Development, we have a duty to ensure our employees understand the importance of working and acting in an ethical way, to ensure vigilance and compliance with relevant laws, processes, and regulations.

In addition to making the Global Compliance training courses an annual cycle, meaning that employees need to repeat their compliance training every year, this year we expanded the roll-out of the Financial Integrity training across the Group. This way we emphasize the importance of the topic, because we are all responsible not only for our own reputation and ethical conduct in the business, but for the trust which society and our customers place in Atos.

Global and local Learning & Development teams, along with the Global Compliance team and all local Compliance Officers worked together throughout the year to make sure the topic was well-communicated, and the results are properly monitored as we walk together towards the common goal.

It is the duty of all employees within Atos to complete all four Global Compliance Courses and the Financial Integrity course. Key to the success of our business in becoming a Secure and Decarbonized Digital company is our commitment to deliver excellence in all our operations.

In 2022, we are pleased to have achieved the highest completion rate in the Group for the Financial Integrity Training in APAC, with 94.54% as of 31 December 2022, out of a population of 2,639 employees.

This could not have happened without the support of our Learning & Development team, our management team and more importantly all our colleagues in APAC.

Since the roll-out of the Financial Integrity Training, with the collaboration of different functions, we managed to promote the awareness through regular internal communications from APAC and local management and follow-up emails with individual colleagues.

This promising result reflects the commitment of our APAC colleagues to financial integrity, and more generally, ethics and compliance which are at the heart of Atos's purpose.
Communication

Excellent internal communication ensures that the compliance program is understood and followed by all employees. An annual communication plan for compliance is developed in cooperation with the Internal Communications team, and includes regular communications such as newsletters, as well as messages based around news and events, so that the communications are interesting for employees, and relevant to their daily work.

Regular communications:

- Managers and leaders need information to help them run the business, and this includes developing their understanding of compliance. With this in mind, the Global Compliance Team sends a Compliance Newsletter to management teams across the global organization. It includes internal compliance news and campaigns about internal compliance projects, as well as compliance news from outside Atos of relevance and interest to senior managers. It is attractively designed with a navigable format, and is sent to around 1,000 managers across the Group.

- In December, Atos again marked UN Anti-Corruption Day with a dedicated communication campaign. This included a video interview with the Group General Secretary for all employees, explaining the value Atos places on doing business ethically and focusing on key anti-corruption topics. In addition, Atos business unit CEOs cascaded messages to their employees, reiterating our zero-tolerance policy for all types of corruption and reinforcing the need to follow the rules and operating procedures 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 employee engagement.

Communications based around news and events:

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

- Other communication campaigns led by Compliance Officers have included an extensive campaign by all local Compliance Officers to encourage completion of the Financial Integrity training.

- As well as communications campaigns run by local Compliance Officers for employees in their scope, a communication was organized by the Global Procurement Compliance Officer about the importance of following our procurement process to ensure that the correct due diligence is carried out on suppliers.

A common challenge for compliance in all organizations is to maintain awareness — through both global messages around key compliance standards and principles, and regular messages tailored for a specific audience on a particular area of vigilance. For that reason, compliance communications during 2022 have been delivered through a range of channels at a global and local level and using different media, to keep employees’ attention and ensure compliance remains at the forefront of their minds.
Internal Communications and People Engagement has a strategic role in the orchestration and cascading of content in a meaningful way to all internal stakeholders, building awareness and understanding of our purpose and strategy.

As part of Atos’s DNA, compliance must be supported by Internal Communications, and we have been working closely with the Global Compliance Team on a plan to engage employees to ensure they understand the importance of compliance and the individual role they need to play to support the area.

In 2022 we focused on effectively supporting the cultural and strategic transformation of the Group by providing visibility to all employees in a meaningful and engaging way, having compliance as one of the most important points in this journey, remembering the code of ethics training, carrying out different activities for UN Anti-corruption day and working with the local communication teams to promote important messages.

We will continue to work together with the Global Compliance Team to create awareness and engage employees to make sure everyone is equally committed to compliance.

Third-party due diligence

A key document relating to the management of third parties is the Atos Partners’ Commitment to Integrity. This document sets forth the ethical commitments that all Atos partners (such as suppliers, subcontractors, clients and other business partners) are expected to take when entering into a contract with Atos. It covers human rights, health and safety of individuals, business integrity and the environment.

The commitments in the Atos Partners’ Commitment to Integrity are adjusted depending on the third-party category concerned. For instance, there are additional requirements for suppliers, such as consenting to be assessed by EcoVadis at least every alternate year. Essentially, it is similar to the Code of Ethics, but applicable to third parties and Atos Partners (other than clients already bound by similar provisions under their main contract with Atos), acknowledging that a breach could lead to the termination of their contract with Atos.

The Atos Partners’ Commitment to Integrity is published externally on the Atos website here: https://atos.net/wp-content/uploads/2022/06/atos-commitment-integrity-en.pdf

In addition to the Atos Partners Commitment to Integrity, Atos manages the risk of dealing with third parties by implementing a thorough due diligence process. One of the key continuous improvement projects for Atos compliance in 2022 was the revision of the third-party due diligence processes for prospects, customers and suppliers, including investing in a new market-leading screening tool.

The compliance checks project involved co-operation between many different parts of the Atos organization, and a joint project team was established including Global Compliance, Global Sales Operations, Global Procurement and Atos IT.

**During 2022, the project team:**

- Revised the end-to-end sales operations and procurement processes, designing a new pre-screening risk assessment formula, and processes for screening and categorizing the outcomes and associated risk mitigation actions;
- Worked with the supplier of the new screening tool, to configure it according to Atos’s needs, to ensure thorough screening for important issues such as international sanctions, corruption, a detailed range of legal breaches, and the identification of human rights abuses to comply with the Duty of Vigilance obligations;
- Trained the Global Compliance, Sales and Procurement teams on how to use the new screening tool;
- Produced detailed guidance on the interpretation of screening results for different findings in order to ensure consistency of judgement between the different teams analyzing the results of screening customers and suppliers;
- Carried out a series of communications across the business so that everyone involved in the sales and procurement processes (senior management in the countries, bid managers, buyers, and all involved in approval processes) understands the new checks and processes; and
- Worked with Atos IT on integrating the new screening tool with existing Atos systems and processes.

For Business Partners, further clarifications and amendments were made to the Business Partner Policy which formalizes the processes for hiring business partners (business finders, resellers and distributors, alliance partners, etc.) and monitoring relationships with them.
In my role of Global Procurement Compliance Officer, I am involved in evaluating the compliance of potential and existing suppliers to Atos.

In 2022 Atos Global Procurement has strengthened compliance checks in the supply chain which are embedded into all key Procurement processes. A new market leading compliance screening tool has been implemented and Procurement processes have been adapted accordingly.

As it is key for Atos to engage only with reliable, healthy and ethical suppliers, compliance screening is included in sourcing activities, new vendor onboarding, contracting and bidding.

Procurement doesn’t only screen suppliers at the time of initial engagement, but also monitors on an ongoing basis. As Global Procurement Compliance Officer, I am alerted to critical changes in the supply chain and can react immediately if required.

Procurement actively monitors the top 250 vendors (representing over 70% of Atos’s total spend) and suppliers that belong to the high risk areas of the supply chain including geographical and sectorial risk factors.

Once a year, Procurement runs category risk mapping to identify and monitor additional suppliers (outside of the top 250 vendors by spend and not included via standard risk factors), that are in a combination of high risk Procurement categories and high and medium risk countries. That gives us a high level of certainty we cover all relevant areas of compliance risk.

Sometimes, risk mitigation actions are necessary to address the risk identified.

I am always given full support to fulfill my recommendations as everyone understands the importance of having an ethical and compliant supply chain.
As Global Sales Operations (GSO) Project Manager, I had the chance to be part of the Compliance Checks for Sales Project team.

Within GSO, we strive to provide a CRM system that helps the Atos sales community to sell better and at the same time ensure compliance with internal and external processes. The project itself is beneficial for two reasons:

Compliance topics are becoming an increasingly interesting topic for our customers. In many cases they ask questions about our Compliance program as part of the bidding process. This is because of the strengthening of anti-corruption legislation globally and the worsening of the reputational risk of dealing with suppliers who do not undertake due diligence on third parties.

It ensures that Atos meets its obligation to conform to global anti-corruption laws, and indeed goes beyond this obligation by ensuring that a wider range of compliance risks are assessed and monitored for all customers Atos engages in business. Hence, the risk of financial and reputational damage from dealing with corrupt entities, or with sanctioned entities is reduced. Risk mitigation actions are also put in place where applicable to address the risks identified.

The project’s main deliverable is having an end-to-end process of dealing with compliance risks from our customers or potential customers, and it ran across various departments (Sales, Sales Operations, Account Admin, Finance/Treasury, Contract/Project Management, Rainbow, etc.) and across many systems (SalesForce CRM, and our SAP ERP platform).

For a better communication towards sales community on compliance topics, we’ve established a Global Compliance Sales Single Point of Contact (SPOC) who is available for 1st level support, and regularly screens any new customer requirements, as well as monitoring any new findings on Customers in our existing portfolio.

**Antitrust**

On competition law topics, the Global Compliance Team works together with the business units on an ongoing basis to advise and provide them all the support they need, both in terms of responding to their questions, and in providing pro-active guidance notes. During 2022, it was decided to focus on two topics in the field of competition: joint tenders and vertical agreements.

First of all, we have accompanied the publication of our internal guidelines on joint tendering with training for Compliance Officers and General Counsels, as well as for managers to ensure their perfect understanding of the legal regime applicable to business alliances, and explain the best practices. The purpose here was to clearly list and explain the conditions that must be met before entering into any form of negotiations in the context of joint bidding, consortia or joint sales agreement, to prevent any risk from a competition law perspective.

Secondly, following the adoption by the European Commission in May 2022 of the new regulation on vertical restrictions applicable to distribution and reselling agreements, we produced internal guidelines to help business and legal teams in managing vertical agreements. The aim of this internal document was to provide simple guidelines to the teams on what is prohibited (which would make the contract fall into the category of anti-competitive agreement) and what is allowed (the conditions to be fulfilled when drafting the contract), including Dos and Don’ts, practical situations and a Q&A.
International sanctions and export control

Atos has a presence in more than seventy countries and routinely conducts projects on a global scale for clients ranging from international organizations and government institutions to private sector multinationals and local businesses. Within the scope of its business activities, Atos undertakes an active role in the circulation of hardware, software and technology among people located in different countries or territories. In so doing, Atos has the obligation to comply with a vast array of laws and regulations, and furthermore, takes responsibility for ensuring that controlled items or services are transferred in compliance with applicable laws and regulations.

Following Russia’s invasion of Ukraine in February 2022, the US, UK and the EU imposed sanctions measures targeting Russia and Belarus. These sanctions have been imposed in different waves during 2022, following the evolution and aggravation of the situation. With the decision of Atos to exit from Russia, much work had to be done by the compliance team to support the exit project. 2022 was an important year from an export control perspective because the US and the EU significantly increased the list of items and services subject to special authorizations and licenses. In parallel, the UK amended its export control framework with the release of several general licenses and an enhanced diligence form to evaluate specific impact from export control perspective, which inevitably made the regulatory landscape more complex.

Finally, in 2022 US authorities also decided to increase controls over Advanced Computing and Semiconductor manufacturing items restricting Chinese access to them.

These changes highlight the importance of maintaining a close monitoring of the export control and sanctions compliance program, and of structuring commercial processes to ensure compliance with appropriate laws and regulations.

In 2022, the Global Compliance Team improved the export control governance by strengthening the network, pursuing various awareness initiatives with the provision of dedicated trainings and publication of internal guidelines, and optimizing key tasks such as screening third parties, collecting classification information, reviewing transactions and amending the existing workflows.

Detection measures

Accounting controls

In 2022 Group Finance and Global Compliance continued to work together on accounting related to compliance topics. The enhanced accounting controls developed during 2021 are fully integrated in the monthly review cycle of the month-end close, where the accounting heads of the legal entities are required to review all systematically identify postings and each Regional Internal Control Manager needs to validate and review the feedback received.

Group Finance and Atos IT are continuously engaged to further improve automated controls into our SAP system, to reduce manual handling and increase further compliance with defined processes and controls.

Alert system

The Atos Code of Ethics makes it clear to employees and third parties that Atos has implemented a Group Ethics Alert System that provides them the ability to raise an alert if they think that a law, regulation, or one of the principles set out in the 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. It is vital that employees and third parties can raise issues and concerns, safe in the knowledge that these 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 Group Ethics Alert System is key to ensuring that compliance potential issues are raised, investigated and dealt with effectively, so that Atos, its operations and stakeholders are protected from the risk of unethical behavior. Beyond dealing with the immediate issues raised in the alerts, it is key for the organization to learn from a review of the cases and the findings from investigations. The alerts provide valuable information about our risks and where we need to educate employees and ensure appropriate controls are in place.

One of the key projects in 2022 was to improve the alert system and associated processes and policies, in order to have the most up-to-date technology for managing alerts, and to improve the user experience, both for employees and stakeholders using the system, and for the compliance team who manage the alerts. The aim was also to provide more clarity on the process and adapt the previous policy to anticipate the implementation of the EU Whistleblowing Directive incorporated into legislation in EU countries.

A team involving compliance, human resources and data protection worked together on this project. In 2022, the new system was piloted in India and following the success of the pilot was implemented locally in the Americas and in Middle East, Africa and Turkey. It is anticipated that the full roll-out will take place in H1 2023, subject to consultation with the Works Councils in Europe.
It was an immense pleasure for me that the Global Compliance Team accepted our offer to implement the pilot of the new Atos Ethics Alert system locally in India. The successful rolling out of the whistleblowing platform for Atos India entities has been possible only because of the dedicated efforts put in by the local teams and our mentors from Atos Group Compliance Department.

We had a project call with all relevant stakeholders every week until the system went live for Atos India entities. As well as myself as the Compliance Officer for India, this involved the India legal team, Global Compliance and the global and local Human Resources teams. We were also supported by the internal communications team as well as the team at Atos University who made an animation for us to explain to employees how to use the new platform.

This project is major milestone for Atos India entities, and the successfully implementation in India of the pilot project meant that local implementations could proceed in other geographies, using the learning from our pilot.

Implementation of the Gifts and Invitation Tool for Atos India entities was another project we delivered in 2022. As a result, the Gifts and Invitation tool is now active for all Atos India employees. We are very lucky and proud to have such supportive colleagues from Group Compliance. They are always stand behind you and extend their support in critical situations.
Analysis of 2022 compliance alerts

This section contains an overall summary of the alerts received in 2022. The numbers include all compliance alerts raised in 2022, reported to the compliance team (global or local) or through the Group Ethics Alert System (global or local) and/or investigated under the compliance alert procedures. For the sake of clarity, it excludes alerts that were raised before 2022 but were still ongoing into 2022.

Overall, the number of alerts in 2022 was the same as 2021, with 73 alerts raised in 2022 as in 2021. The alert statistics for prior years were 78 in 2020, 120 in 2019 and 51 in 2018. The latest data reinforces the view that 2019 was an outlier in an otherwise steady number of alerts — especially since more communication was done in both 2021 and 2022 to ensure employee awareness of the process.

As in previous years, the geographical spread of alerts in 2022 included all Regional Business Units. This coverage suggests that the communication of the alerts process outlined above has been effective and that employees know how to seek help if they have any concerns about compliance issues. A detailed analysis of the alerts is prepared and presented to the Board of Directors and the GMC annually in February. Additionally, in re-designing the Corruption Risk Mapping process during 2022, previous alerts were examined in order to ensure that the scenarios envisaged in the risk identification framework included learning from alerts raised in recent years, and the location and subject of alerts (for example the processes to which the alerts relate) is also used by Group Internal Audit when planning their annual audit schedule.

Control measures

The monitoring of the compliance program is managed in cooperation between Global Compliance and Group Internal Control and Enterprise Risk Management (ERM).

In all its operations, Atos operates a three-tier control system with three lines of defense:

First line of defense
The purpose of the first line of defense is to execute internal controls to ensure that processes are performed in compliance with the Group’s internal policies. They are performed by designated employees as part of their daily activities.

Second line of defense
The purpose of the second line of defense is to ensure that the first-line controls have been properly carried out. The effectiveness of these controls is regularly assessed through self-assessment questionnaires and testing campaigns organized by the Group Internal Control & ERM Team.

Third line of defense
The purpose of the third line of defense is to ensure that the control system complies with the Group requirements and is implemented effectively. This is the role of Group Internal Audit, which is responsible for conducting entity reviews and process reviews, as per the approved annual audit plan.

All entity reviews conducted by Group Internal Audit contain checkpoints related to compliance risks. Process reviews may also contain checkpoints on compliance matters, depending on the subject matter of the review.

As for any internal control system, this mechanism can only provide reasonable assurance, not an absolute guarantee against risk.
Critical to this system are the internal control measures 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. The BIC identifies the key controls to be executed by the first line of defense, as well as the control procedures for the second line of defense within each Atos Key Transversal Process, and Key Transversal Activity. It is reviewed on a continuous basis and new versions are published at least once per year.

In 2022, compliance controls in the BIC were fully integrated in the internal control approach. First, the design of such controls has been reviewed as part of a recurring and productive cooperation between Global Compliance and Group Internal Control. The effectiveness was also tested through Group-wide control testing campaigns covering 43 controls. Further to this, corrective actions have been taken with management to ensure improved effectiveness and follow-up. An evaluation of the maturity level of 123 internal controls was also carried out through a self-assessment questionnaire.

**Duty of vigilance approach**

In France, the Duty of Vigilance Act establishes a legal obligation for prudent and diligent behavior relating to social responsibility, not only in a company’s own business but also throughout the supply chain. It applies to large organizations that employ more than 5,000 employees in France or 10,000 employees worldwide, bringing Atos well within the scope of the law.

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, third-party 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, made available to the public.

Atos has developed and formalized in its Universal Registration Document an effective Vigilance Plan to mitigate the risks of breach to human rights, health and safety and the environment, for its own business and throughout its supply chain.

The revision of the methodology conducted in 2020 allowed Atos to improve the effectiveness, governance and ongoing monitoring of its Vigilance Plan. This process involved full coordination of key stakeholders directly involved in the prevention and mitigation of the targeted risks, including Group CSR, Global HR, Group Security, Legal and Compliance, as well as the Procurement functions.

As a result, all actions and contributions now form part of a unified and improved program, which is further detailed in Section 5.4.8 of the Atos 2022 Universal Registration Document.

In accordance with the Duty of Vigilance Act, a collaborative review of the Group Ethics Alert System was conducted with the unions in 2021 to assess the existing system and identify areas for improvement — notably, but not only, in terms of legitimacy, transparency, accessibility and effectiveness.

In 2022, one of the key compliance projects was to improve the alert system and associated processes and policies, as mentioned above in the “Alert System” section. A team involving compliance, human resources and data protection worked together on this project and the Ethics Advisory Body (Collège des Déontologues) was consulted on the revised draft policies (i.e., Group Alerts System Policy and Investigation Guidelines) to gain their expert opinion in light of the new applicable laws resulting from the transposition of the Directive (EU) 2019/1937 on the protection of whistleblowers.

There will be further consultation on the project with the European Works Council (SEC) and local works councils, as applicable, in 2023 before the new system is rolled out globally.
Since 2017, in accordance with the Modern Slavery Act 2015 (MSA), Atos IT Services UK Ltd has published an annual Modern Slavery statement containing the steps that Atos companies in the United Kingdom have taken to ensure that slavery (including servitude, forced and child labor) and human trafficking are not taking place in their business and supply chain.

Over the years, we made some good progress and we strive for continuous improvement. Among other achievements, we amended Atos UK suppliers terms to include compliance by suppliers with the MSA; we completed a risk mapping exercise within Atos’s Tier 1 supply chain to understand countries and sectors at risk of modern slavery; we developed and delivered to Atos UK employees a modern slavery training, which we recently turned into an e-learning available to all Atos UK suppliers.

While the UK Government is working on addressing some failings of the MSA (i.e. by creating mandatory reporting areas and civil liabilities for non-compliance), modern slavery and human rights supply chain due diligence are at the center of many legislative initiatives worldwide: the German Supply Chain Due Diligence Act, the recent US Uyghur Forced Labor Prevention Act, the upcoming EU Corporate Sustainability Due Diligence Directive, to name but a few.

In light of those developments, I hope that our achievements in terms of Modern Slavery statement can lead the way to take actions to prevent the risk of such crimes being committed in Atos Group’s business and supply chain.

More information about compliance at Atos

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

- The Atos Code of Ethics [Click here]
- The Privacy Information Notice for the Group Ethics Alert System [Click here]
- The Atos Partners’ Commitment to Integrity [Click here]
- Investors’ page of the Atos website to access the Universal Registration Document [Click here]
About Atos

Atos is a global leader in digital transformation with 111,000 employees and annual revenue of €11 billion. European number one in cybersecurity, cloud and high-performance computing, the Group provides tailored end-to-end solutions for all industries in 69 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.

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.

Find out more about us
atos.net
atos.net/career

Let’s start a discussion together