

A low-angle, upward-looking photograph of several modern skyscrapers with glass facades. The buildings are illuminated with a cool blue light, and some windows show warm yellow interior lights. The perspective creates a sense of height and architectural grandeur.

Atos Modern Slavery Statement

For year ended
31st December 2023

Atos

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This statement has been authored by the Atos Anti-Modern Slavery Working Group and outlines the actions and approach adopted in accordance with section 54 of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015. The legal entities encompassed within this statement include Atos IT Services UK Limited, Atos BPS Limited, Eviden Technology Services Limited and Syntel Europe Limited (collectively referred to as “Atos”).

Foreword

In today's globalised world, where supply chains span continents and industries, modern slavery persists as a stark reality. According to the International Labour Organisation an estimated 49.6 million individuals were subjected to slavery in 2021 worldwide. Atos stands firm in its stance against all forms of slavery and in our commitment to tackling modern slavery risks and investing in a slave-free future. We prioritise transparency, accountability, and ethical conduct across our organisation and supply chain, collaborating closely with our partner ecosystem to ensure adherence to relevant laws and standards.

A message from our Head of Group Corporate Social Responsibility



Alexandra Knupe
Head of Group Corporate Social Responsibility

“This year’s Atos UK Modern Slavery Statement details our stringent protocols to combat modern slavery and outlines forthcoming initiatives that reinforce our actions in tackling it within the UK, across Atos Group, our global supply chains, and our industry. It underlines our dedication to upholding human rights, dignity, and equality within our sphere of influence and utilising learning from cross-industry best practices to accelerate change.”

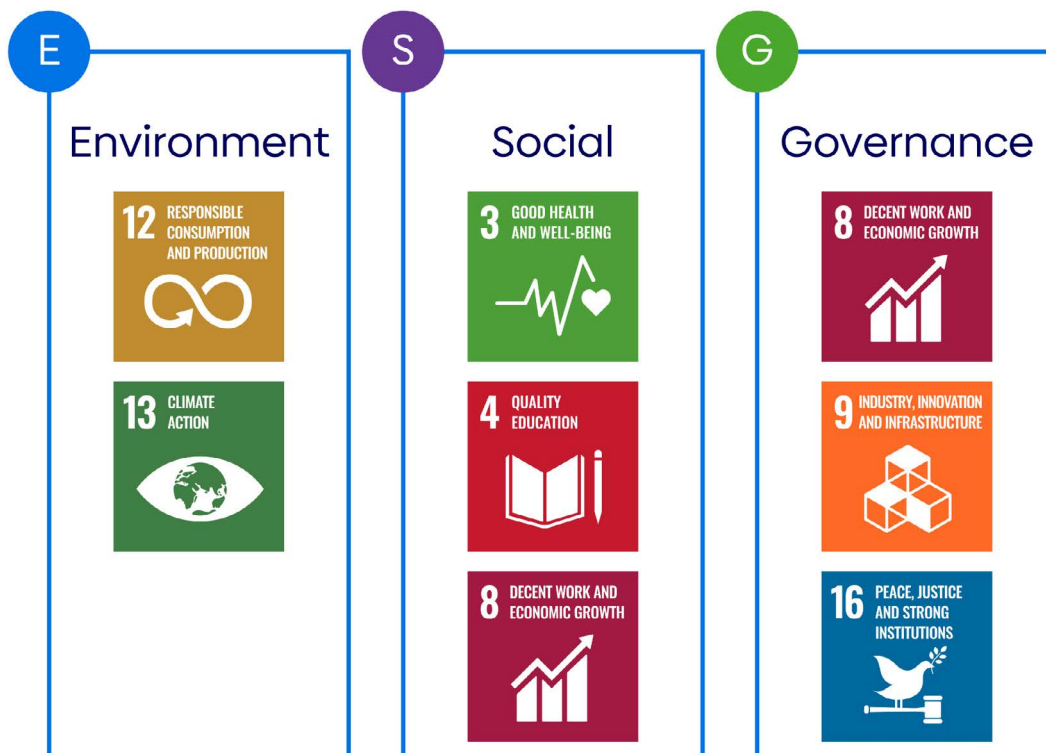
Introduction

As a global organisation, we adhere to stringent domestic human rights, supply chain transparency and modern slavery-related international regulations, such as the recently released German Supply Chain Due Diligence Act. We believe modern slavery should be considered a human rights issue at a global and country level with modern slavery reporting forming a key pillar of compliance and risk management.

Our human rights approach and related policies flow down through our organisational structure with a focus on country specific laws, requirements, and regulations. Based on this approach, the statement will present protocols and initiatives at a group level first and where we have UK specific reporting, approaches and data this will be indicated.

Since our last statement, we have made several improvements to further evidence our commitment to managing modern slavery risk. These include:

- Contributing to the Business Services Association's Modern Slavery Councils' ['Tackling Modern Slavery in the UK Service and Infrastructure Projects Sectors Toolkit'](#). This is a Toolkit to provide businesses within the service and infrastructure projects sector with a best practice guide on how to address the risks of modern slavery within their own structures and their supply chains.
- Maintaining an EcoVadis Platinum Award for our performance in Corporate Social Responsibility (CSR), evaluated across four categories: Environment, Labour & Human Rights, Ethics, and Sustainable Procurement.
- Increasing our Modern Slavery Assessment Tool (MSAT) score by 2% to achieve 89%.
- Contracting enhanced services from EcoVadis to further monitor our supply chain.
- Updating our Group Ethics and Compliance policy and the endorsement of our Human Rights Policy Statement.
- Strengthening the due diligence process on third parties (including suppliers, clients and business partners).



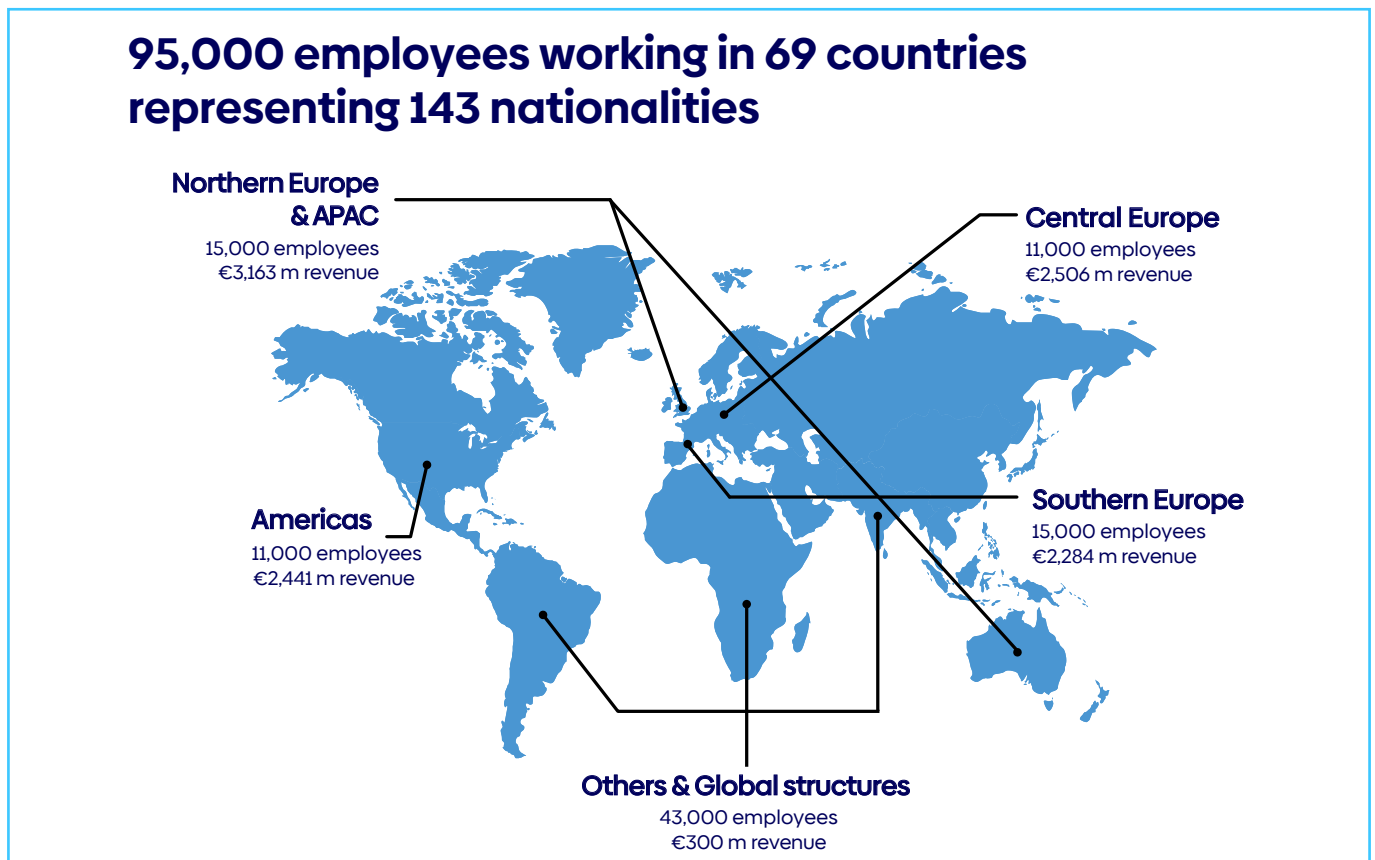
Since 2010, Atos has been an active participant in the [UN Global Compact](#), aligning its operations to their Ten Principles. In addition, Atos directly contributes to 8 of the 17 Sustainable Development Goals (SDGs) through the company's 11 material topics, including SDG 8 «Decent work and economic growth».

Our business and supply chain

Our business

Atos is a global leader in digital transformation with c.95,000 employees and annual revenue of c. € 11 billion. European number one in cybersecurity, cloud and high-performance computing, the Atos Group¹ provides tailored end-to-end solutions for all industries in 69 countries. A pioneer in decarbonisation services and products, Atos is committed to a secure and decarbonised digital for its clients. Atos is a SE (Societas Europaea) and listed on Euronext Paris. Within Atos Group we operate within two business lines, Tech Foundations and Eviden.

Atos serves a diverse client base across various sectors, encompassing resource management and services, governmental and defence organisations, the healthcare and bioscience fields, telecommunications, media and tech industries, manufacturing, as well as the financial and insurance services sector.



Our supply chain

The vast majority of our UK supply chain spend (98.84%) is located in 15 low-risk countries (according to our internal risk rating methodology) and across the United Kingdom. The remainder was spent in Europe and North America; with 90.71% of the spend in 2023 directly sourced from suppliers located in the UK.

In 2023, 57% of the purchases were IT-related (software, hardware, etc.) and 28% is subcontracting and manufacturing, while the remaining spend was related to so-called 'indirect' spend including mobility, professional services, facilities management, and real estate.

In 2023 in the United Kingdom, Atos' spending was recorded at around £1billion annual third party spend, utilising over 1,000 suppliers for services and products to both Atos and our clients. Atos is committed to continue to develop an efficient and effective supply chain, both in its strategic design and operational execution, whilst also maintaining ethical sourcing standards.

98.84%

Of the UK spend is with supply chain partners located in low-risk countries

90.71%

Spend in 2023 was with suppliers located in the United Kingdom

¹ The term Atos Group refers to all the companies controlled directly and indirectly by the holding company of the group, Atos SE.

Policies and contractual controls

Atos has continuously developed a Corporate Social Responsibility programme, which also includes labour practices. The programme's main objective is to manage the impacts of the Group's operations in a responsible manner and to integrate social and environmental factors in our supplier solutions. A number of policies and documents have been developed and implemented to achieve this objective.

Group Code of Ethics

Atos commits within its [Code of Ethics](#), to ensure compliance with international labour regulations, including all applicable wage and working hours laws and regulations, and to act responsibly when dealing with all its partners while guaranteeing strict compliance with relevant laws and regulations.

The Code of Ethics states that Atos respects internationally proclaimed human rights, rejects the use of child labour, the use of forced, bonded or compulsory labour as well as human trafficking and all forms of human slavery in accordance with the UN Human Trafficking Protocol and the UN Slavery Convention.

Group Ethics and Compliance Policy

The Group Ethics and Compliance Policy, updated in 2023, sets out the roles of each individual and their responsibilities regarding the fight against modern slavery and ensures that the Group's activities are always carried out with the greatest possible integrity, particularly in terms of human rights.

Group Human Rights Policy Statement

Atos Group [Human Rights Policy Statement](#), co-signed by the Group Chief HR Officer and the Senior Executive Vice President, details acts to prevent infringements on internationally recognised human rights as expressed in the International Bill of Human Rights and on the principles set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work. The Group aligns its prevention with the United Nations' Guiding Principles on Business and Human Rights and refers to the United Nations Global Compact principles on human rights, labour, environment, and anti-corruption. Moreover, Atos aims to be a responsible employer globally, acting fairly in its labour and employment activities, and to conduct business in an ethical and sustainable way, in all its spheres of influence: employees, customers, partners, and across the supply chain.

Group Vigilance Plan

In accordance with the French Duty of Vigilance law, Atos Group has implemented a Vigilance Plan (published yearly in the [Atos Universal Registration Document](#)) to prevent and address severe impacts on: human rights and fundamental freedoms, health and safety of individuals and the environment. Atos UK is included in the scope.

The Vigilance Plan covers all risks stemming from Atos Group's own activities and supply chain, notably to address and prevent human rights risks including modern slavery related risks. Vigilance measures include risk mapping, evaluation procedures, mitigation actions, alert mechanisms, and monitoring systems.

Group Code of Conduct for Supplier Relationships

While every employee must respect the principles of the Code of Ethics, there is also a stringent Code of Conduct to which Atos employees engaged in procurement or those who frequently interact with suppliers must adhere.

Specifically addressing slavery and human trafficking, the Code of Conduct unequivocally expresses Atos' commitment to partnering with suppliers who reject the use of child or forced labour, do not endorse any form of psychological or physical duress, honour both individual and collective freedoms, and adhere to employment laws from hiring through to contract completion.

This document is an integral part of the onboarding process for the Procurement teams. Each new member is required to sign it, confirming their comprehension and acknowledgment of its contents.

Non-adherence to this Code of Conduct could lead to disciplinary measures, potentially culminating in the termination of employment.



Group supply chain standards

[Atos Partners' Commitment to Integrity](#) establishes requirements that every Atos partner must comply with in four areas: human rights, health and safety of individuals, business integrity and environmental impact.

It details that the prevention of forced or compulsory labour, child labour, harassment, discrimination, and respect of employees' individual and collective rights are part of the human rights requirements. Atos partners (suppliers, subcontractors, clients, resellers, distributors, and business partners) must support, themselves respect, and encourage their own supply chain to respect these requirements.

Prior to participation in any Atos sourcing event, a potential partner must confirm compliance with the principles set in the Atos Partners' Commitment to Integrity and after, must confirm ongoing commitment through formal signature of the document as part of the Atos contractual terms and conditions.

By accepting the Atos Partners' Commitment to Integrity, each partner also recognises Atos' right to perform onsite audits to ensure it has put adequate internal procedures in place to fulfil its integrity commitment.

Failure by a partner to comply with Atos' requests for information in relation to the Atos Partners' Commitment to Integrity or to meet Atos' requirements set out in this Commitment (including in case the partner commits human rights violations), can result in its exclusion from Atos' preferred suppliers list and, once a contract is in place, even to the termination of the contract.

Since 2018, the Atos Code of Ethics has also been an integral part of Atos standard supplier terms and conditions used in the United Kingdom. Accordingly, if a supplier commits material failures of the Code, Atos can terminate its relationship with the supplier.

Group Conflict Minerals Statement

This statement outlines the measures implemented by Atos Group to comply with its legal obligation to reduce the risks associated with "conflict minerals" in its supply chain. Although Atos does not directly purchase conflict minerals from its suppliers, it purchases component parts and materials that contain metals, some of which may contain minerals extracted from a place where conflicts are on-going. As such, we work with suppliers to verify that minerals are conflict-free, also using a due diligence supporting tool called 'Silicon Expert'. This tool delivers an environmental compliance management system and database providing information on over 20,000 electronic distributors and suppliers.

In the Atos' Partners' Commitment to Integrity, it is stated that Atos suppliers must take steps to determine if their products contain conflict minerals (tantalum, tin, gold, and tungsten) from conflict regions (e.g. Democratic Republic of Congo, Rwanda, Tanzania, Uganda, Zambia) and, if so, put in place all necessary compliance due diligence processes to ensure that their products are responsibly manufactured.

UK Responsible Recruitment and Living Wage

We work closely with our recruitment partners to promote responsible business practices and integrate diversity, equity, and inclusion into our HR processes. Recruitment partners are subject to our supply chain due diligence programme to ensure their practices comply with the Modern Slavery Act 2015. All candidates also undergo a right to work check as part of our onboarding process.

We recognise the importance of fair and equitable pay and take the guidance provided by the Living Wage Foundation seriously. We pay real Living Wage in the UK, which is a voluntary rate paid by employers who choose to go beyond the government minimum. On an annual basis, we receive the new Living Wage rates, and we conduct a review to ensure our employees in the UK are being paid in accordance with the new rates. Within six months of our review any necessary changes are processed to bring employees in line with the cost-of-living rates.

Training

Group Code of Ethics Training

Every year, all Atos Group employees have to complete an e-learning course that explains each principle from the Code of Ethics including any updates. The training includes a final assessment to ensure employees have a practical understanding of the Code's principles. All new joiners must complete it within three months after their employment. The course is updated annually to reflect any additions or updates. Annually, managers must undertake an in-depth Code of Ethics training program to help reinforce ethical conduct to underpin the ethical behaviours expected of them.

UK Modern Slavery Training

Atos provides a bespoke training course on modern slavery to equip UK employees with the knowledge and tools necessary to identify, prevent, and report instances of modern slavery and human trafficking. This e-learning course was developed to address technology sector-specific risks and mitigation, explaining Atos' commitment to reducing modern slavery and the steps we are taking to tackle it within our organisation and supply chain. It raises awareness of different types of modern slavery, how they can be identified and explains the actions we expect employees across our business to take to reduce the risk of modern slavery. Should employees need to raise concerns, it provides links to our whistleblowing channels. This training is accessible and mandatory for all current UK employees and is embedded within employee onboarding materials. We monitor and report completion rates, setting internal targets annually.

To continue raising employee awareness of Group compliance training and locally required training in the UK, two training charters were published in 2023 outlining the purpose, details, approach, and responsibilities of stakeholders in completing courses including the modern slavery training.

Atos has developed a bespoke modern slavery e-learning package for suppliers. This version of the training focuses on responsibility across the supply chain and raising awareness of grievance mechanisms that can be used by internal and external parties if required. In 2023, the Atos Knowledge Exchange Platform was launched to enable easy access to this training for Atos suppliers in the UK, providing a mechanism to ensure improved awareness and understanding of modern slavery. We launched a campaign targeted at small and medium-sized businesses in our supplier ecosystem (who may not have access to internal company training) to encourage them to complete it.



Group Risk Assessment

To uphold our understanding of the human rights risk landscape and take action to mitigate risk at a category and country level, Atos Global Procurement has completed a comprehensive risk mapping exercise of our Tier 1 suppliers in our Group supply chain.

The output of this exercise is a map of potential human rights related risk within certain categories and countries, enabling us to identify and address risks at a group and local level. None of our “core” spend categories were deemed high risk. The exercise identified some high and severe risk (not core) spend categories, including medical equipment, company vehicle fuel, waste solid/liquid and waste electrical and electronic equipment, and water. We then assigned risk scores to each of the countries where Atos suppliers are located, based on the list of country risk levels that is maintained by Atos Group compliance. This exercise concluded that there were just twenty-one countries identified as high or very high risk, with spend in high-risk categories: Algeria, Argentina, Brazil, Bulgaria, China, Gabon, Hong Kong, Hungary, India, Ivory Coast, Malaysia, Mexico, Morocco, the Philippines, Romania, Senegal, Serbia, South Africa, Taiwan, Thailand and Turkey. To provide greater visibility and prioritise action, we have compared higher risk categories and countries to highlight any spend and/or suppliers falling into both mapped areas.

During 2023 there was no severe risk category spend in medium, high, or very-high-risk countries. Based on these country and category combinations, we confirmed that a very small percentage, 0.02% of Atos Group’s Global Tier 1 suppliers’ spend fell into high-risk areas. Statistics about UK spend data can be found in page 5 of this Statement.

To enhance our management of risks identified during the mapping exercise, suppliers identified in high or severe-risk category and very high, high, and medium-risk country combinations will be subject to further compliance checks and continuous monitoring through our Compliance Catalyst tool.

The tool screens the suppliers for compliance issues on a wider scope, including human rights related offences, using a screening software and databases which indicates whether the suppliers are subject to international sanctions (such as the Global Magnitsky human rights sanctions, import/export bans based on human rights violations, investment bans for Chinese companies responsible for, or complicit in, human rights violations, etc.), are subject to convictions for human rights violations, or have been related to human rights abuses. So far, no critical findings resulted from these checks.

Atos Group Procurement will run a similar exercise of risk mapping at least once a year to monitor the spend within these areas

Group Due Diligence

Labour practices and human rights feature as a key supplier evaluation criterion when selecting new partners, suppliers, or subcontractors, representing up to 20% of the scoring used in supplier performance surveys and e-sourcing events.

Our suppliers are asked to demonstrate their maturity on CSR themes by submitting existing and globally recognised accreditations or certification. All suppliers with initial geographical or industrial risk factors will be screened through Compliance Catalyst.

All new suppliers without initial risk factors are screened via a different tool aimed at checking whether international sanctions are imposed on them. In case of findings, the request is sent to the Procurement Compliance Officer for further review through the Compliance Catalyst tool. If an area of concern is identified, depending on the supplier product/service and geography, our procurement managers, accompanied by the relevant subject matter experts, may request further details and documentation to eliminate any concerns before progressing any further with the specific supplier. Furthermore, the tool will alert every time there are new events linked to a supplier.

Through the evaluation of potential suppliers’ labour practices and their regular assessment via sustainability reviews, Atos considers modern slavery at all stages of procurement, from identification of a requirement to delivery. A question regarding human rights related processes and initiatives (including modern slavery) was added in 2022 to the supplier onboarding questionnaire. Also, since 2022, a full section regarding human rights (including modern slavery) has been added to the sourcing selection questionnaire and the supplier management performance review questionnaire. For suppliers who have no initiatives or processes in place to ensure that modern slavery, including child labour, forced labour, compulsory or bonded labour and human trafficking is not taking place in any part of their business or supply chain, Atos may require that they develop appropriate mechanisms as a condition of working with us.

Group Supply Chain EcoVadis Assessment

To ensure due diligence of our supply chain, Atos uses EcoVadis to proactively monitor and evaluate our Tier 1 suppliers' human rights practices, including human resources, human rights issues, human trafficking, and debt bondage.



Every 2 years, EcoVadis generates a survey for completion by Tier 1 supplier organisations; this is supplemented by additional information that is in the public domain.

To evidence our commitment to improving human rights

practices within our supply chain, from 2022 to 2023 we increased the suppliers assessed by 50%. This increase in assessments identified that 2.8% of the total Atos Group spend was provided by suppliers who scored below our score threshold of 40 on the topic of labour practices and human rights. In 2023 we initiated Corrective Action Plans (CAP) for all these suppliers. To drive improvements, we proactively monitor, track, and report the CAP statuses and scorecards with our suppliers. If the vendor shows no propensity to improve, we can reassess the risk and remove the organisation from our supply chain. Progress is tracked, and suppliers are encouraged to be reassessed in the next 12 months.

We also utilise EcoVadis to assess our own procurement practices and in 2023 Atos Group retained the "Platinum" status for our Corporate Social Responsibility performance, confirming our leadership position in the IT Industry in respect of CSR.

Atos also leverages assessment services from other organisations such as Sedex, Achilles, Sustainalytics, and B-Corp Certification, to monitor the performance of Atos' suppliers in 'Human Rights'. We include the percentage of strategic suppliers (top 250) assessed using EcoVadis (or an alternative assessment) as a core CSR Group Key Performance Indicator, achieving 79% in 2023, an increase of 3% compared to 76% in 2022.



Effectiveness

Atos' commitment to combatting modern slavery is demonstrated through the implementation of robust policies and comprehensive due diligence procedures. The effectiveness of these protocols is addressed through reporting and disclosure.

Disclosure of identified instances of modern slavery

EcoVadis supply us with an alert service providing timely news updates and information about watch lists, including legal proceedings involving Atos' Tier 1 suppliers that have completed the EcoVadis assessment. As a result, we are made aware of any wrongdoings, including those in relation to modern slavery offences, by our supply chain.

EcoVadis has not alerted us to anything specific in our Tier 1 supply chain, however as and when we are made aware of emerging potential risks at an industry level, we continue to monitor to assess potential impact on our individual supply chain.

Grievance mechanisms

Atos Group has a whistleblowing system, available for all Atos employees, but also externally for all our third parties. If an Atos employee or a third party considers that a law, regulation, or one of the principles set out in this 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, they may report it to their immediate superior, their local Compliance Officer or to the Group Compliance Officer using the email address GroupComplianceOfficer@atos.net, in accordance with local laws relating to whistleblowing.

In the UK, Atos has a Whistleblowing Policy (including clear and specific guidance on modern slavery) to educate and advise employees on the legalities and principles of whistleblowing, and how to disclose suspected wrongdoing in the workplace.

All employees (including workers, interns, contractors, agency staff, casual workers, and consultants) are encouraged to raise concerns about potential criminal, fraudulent or dangerous activities. Regular communications are issued to ensure the channels for raising concerns are known. Those who disclose concerns are supported by the Atos Employee Relations Advisory Team. Within Atos, no alerts were raised in 2023 through our whistleblowing system regarding possible human rights violations.

We have implemented a multi-channel approach for concerns to be raised, including an online channel through our internal HR Portal, a confidential phone line to an external third party and an external contact point on our Atos UK&I website. Our UK supply chain training informs suppliers and partners of the speak up mechanisms available to them as external parties.

UK Cross – Industry Collaboration and Non-Governmental Organisation (NGO) Engagement

To accelerate change and cross-organisational learning we believe that collaboration across the technology industry and industries with differing risk landscapes is crucial to understanding, embedding, and developing best practices. Throughout 2023 Atos remained member of the Business Service Association (BSA), a policy and research organisation for business services providers across the private and public sectors. Delegates from the Atos Anti-Modern Slavery working group attended the BSA Modern Slavery Council meetings and contributed to outputs of the group. The Council is aimed at raising awareness of modern slavery risks within the operations and supply chains of the BSA members through education and training and to share best practices within the industry to mitigate modern slavery risks. For example, in June 2023 Atos was named as contributor to the ['Toolkit: Tackling Modern Slavery in the UK Service and Infrastructure Projects Sectors Toolkit'](#).

In 2023, we began a selection process to identify whether an additional independent third party, including a number of NGOs, would support our work. Due to possible upcoming changes to modern slavery legislation, we believe a partner, if appointed, could help us to be more proactive and assist us to future-proof our approach. They could also help in assessing the maturity of initiatives, conducting a gap analysis and proposing practical actions to improve our approach.

Group and UK KPIs

Atos' commitment to combatting modern slavery is demonstrated through the implementation of robust policies and comprehensive due diligence procedures. The effectiveness of these protocols is addressed through reporting and disclosure.


KPI	Number of employees trained to the Code of Ethics e-learning	Number of suppliers and related level of spend subject to an EcoVadis, or equivalent assessment	Number of suppliers with corrective action plans requested by the Atos Group
Group Result	In 2023 93% of employees completed the Code of Ethics e-learning globally.	In 2023 73% of Atos Group's global spend was with suppliers who have undertaken an EcoVadis (or alternative) assessment. 198 of 250 strategic suppliers were scored or reassessed by EcoVadis representing 79%.	In 2023, 62 suppliers assessed by EcoVadis had an overall score below 40, which is deemed insufficient. However, those 62 suppliers represent only 2.8% of the total Atos Group spend. Only 17 suppliers out of the 62 are top and strategic suppliers.
UK Result	In 2023 88% of employees in the UK completed the Code of Ethics e-learning.	In 2023, 83% of UK spend was with suppliers who have undertaken an EcoVadis (or alternative) assessment.	

Closing Statement

Atos is globally recognised as a sector leader for its Corporate Social Responsibility programme. We are aware that modern slavery risks are constantly evolving in today's globalised and interconnected world, and we hold a responsibility to raise awareness of this changing landscape and take collective action towards a slave-free future. For this reason, we will continue to prioritise responsible business and efforts toward excellence in corporate standards and ethics.

This statement was approved by the Boards of Directors of Atos IT Services UK Limited, Eviden Technology Services Limited, Atos BPS Limited and Syntel Europe Limited.

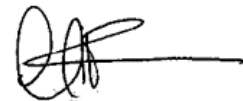
Signed



Nikki Kelly
 Director of Eviden
 Technology Services Limited
 and Syntel Europe Limited
 June 2024



John Ainsworth
 CEO Atos BPS Limited
 June 2024



Clay Van Doren
 Director of Atos IT Services UK Limited
 June 2024

About Atos

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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



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