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# Atos modern slavery statement

for year ended 31<sup>st</sup> December 2020



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**Atos**



# Introduction

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps that Atos IT Services UK Limited and other relevant group companies<sup>1</sup> (“Atos”) have taken during the year ending 31 December 2020 to ensure that slavery and human trafficking are not taking place in their supply chains and in any parts of their business.

Conducting business in an ethical and sustainable way is part of Atos culture and strategy in all of its spheres of influence, it is a “must have” that Atos is proud to integrate into the company’s thinking and processes. We truly believe that our responsibilities go beyond our own company and we strive to embed our values in the relations with all our employees, customers, partners and across our supply chain.

In 2017 we published our first Modern Slavery statement and at the same time put in place a number of initiatives in relation to excellence in corporate standards and responsibility to be developed during the following financial years.

Since then we have made a number of improvements to the Atos Corporate Social Responsibility (CSR) programme: we have completed a comprehensive risk mapping exercise within Atos’ supply chain, we have amended our suppliers terms to include references to modern slavery and developed modern slavery training to be delivered to our higher risk suppliers. We have completed delivery of new tailored training for all Atos employees to help them understand how to identify risks and raise concerns about potential modern slavery offences, updated our Whistleblowing Policy to include specific guidance for modern slavery and created a speak-up function that can be accessed internally by our employees and also externally on our UK&I website by our supply chain. These initiatives are all in line with the Modern Slavery Act 2015 requirements, which we continue to implement in our corporate processes.

<sup>1</sup> This statement sets out the steps taken by Atos IT Services UK Limited, Atos UK International IT Services Limited and Atos BPS Limited, insofar as they fall within the scope of section 54(2) of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015.

# Our business and supply chain

Atos is a leader in digital services, delivering a wide array of digital solutions, including advanced computing, analytics, AI and automation, digital consulting, internet of things, cloud solutions, infrastructure and foundation services, big data and cyber-security. With just over 8,000 people based in the United Kingdom, Atos is focused on business technology that powers progress and helps organisations to create their firms of the future in a more sustainable society.

Atos' client base spans across different markets and industries: from resource and services, to public sector and defence, healthcare and life sciences, from telecom, media and technology, to manufacturing and financial services and insurance.



74 suppliers representing 80% of the spend for services and products



89.17% spend in 2020 with suppliers located in the United Kingdom

In the United Kingdom, with around £757 million annual third party spend and 74 suppliers representing 80% of the spend for services and products to both Atos and our clients, we are committed to developing a high-performing supply chain in its design and conduct as well as having responsible sourcing practices in place.

The Atos supply chain is mainly located in 21 countries in Europe and North America where 99.93% of the overall supplier spend is directed; in 2020 we spent 89.17% with suppliers located in the United Kingdom. In 2020, IT requirements spend made up the greatest part of purchases (48.2% of demands) the majority of which was made with the largest IT Tier 1 suppliers. Subcontracting was the second largest source of procurement spend with 31.96% while the remaining 19.82% of this spend was related to so-called 'indirect' spend including mobility, professional services, facilities management and real estate.

# Policies and contractual controls

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

## Code of Ethics

Atos Group<sup>2</sup> has adopted a new version of its [Code of Ethics](#) which all Atos employees worldwide are required to train on and adhere to in their working practices. The Code introduces Atos' "Sense of Purpose" which is to help design the future of the information space enabling its customers and employees, and members of societies at large to live, work and develop sustainably, in a safe and secure information space. The Code of Ethics is part of the DNA of Atos and is a guide that all employees shall follow to ensure they are doing the right thing when carrying out business.

Within the Code of Ethics, Atos is committed to ensuring 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 laws and regulations.

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

## Atos' Vigilance Plan

In accordance with the French Duty of Vigilance law, Atos Group is required to implement a Vigilance Plan to prevent and address severe impacts on human rights and fundamental freedoms, health and safety of individuals and the environment. Atos in the UK is included in the scope. The Vigilance Plan covers all risks stemming out from Atos Group's own activities as well as from its supply chain, notably to address and prevent human rights risks including modern slavery related risks. Vigilance measures include but are not limited to risk mapping, evaluation procedures, mitigation actions, alert mechanisms, and monitoring systems. Atos Group frequently reviews its Vigilance Plan to provide the most accurate picture of the risks faced by Atos Group or by its suppliers and subcontractors in their activities. It can be found in [Atos Universal Registration Document](#) which is publicly released and updated every year.

## Global Ethics and Compliance Policy

In 2020, Atos Group adopted a new version of the Global Ethics and Compliance Policy which provides guidance on ethics and compliance in respect of human rights and a number of other matters. Atos managers worldwide must comply with this Policy and its principles must be followed by all employees working in or with Atos.

This Policy contains the same commitments in terms of human rights protection as the Code of Ethics and, in particular, the pledge that Atos Group acts to prevent infringements on internationally recognized human rights as expressed in the International Bill of Human Rights and of the principles set out in the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

The Policy also sets out a list of responsibilities for senior managers, general counsels, and compliance officers to make sure that the Policy is publicised and implemented within Atos Group.

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

- (i) measures are in place within the organization to comply with the Modern Slavery Act 2015;
- (ii) a monitoring and alert system is set up and made available for both employees and external parties, to detect any human trafficking-related activities, and to respond appropriately to anything that raises any reasonable suspicion of such behaviour;
- (iii) if any doubt or risk is identified, input must be sought from global or local compliance departments to carry out an in-depth assessment of the nature of the risk and its consequences.

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

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



## Human Rights Policy Statement

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

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

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

## Code of Conduct for Relationships with Suppliers

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

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

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

## Supply Chain Standards

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

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

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

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

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

The Atos UK standard supplier contractual terms and conditions include obligations on suppliers to comply with the Modern Slavery Act 2015, and ensure that (1) neither they nor their subcontractors are under investigation nor have been convicted for modern slavery offences, (2) they conduct reasonable due diligence on their own supply chains' working conditions and practices and notify Atos immediately in the event of suspected slavery and human trafficking offences taking place in their supply chains.

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

## Conflict Minerals Statement

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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. Since early 2013, Atos Group has started a consultation process with its major suppliers on the origin of the raw materials they use, in view of the issue of conflict minerals and in order to prevent any impact on its supercomputers.

In the Atos' Business Partner's Commitment to Integrity, 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, to put in place all necessary compliance processes to ensure that their products are responsibly manufactured and do not contain conflict minerals. To mitigate such risks, Atos uses the due diligence supporting tool Silicon Expert.

# Risk assessment and due diligence in relation to slavery and human trafficking

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

## Risk assessment

To gain understanding of the possible high-risk areas related to human rights abuse within the supply chain, in 2020 Atos Global Procurement has completed a category and country risk mapping exercise of the Atos Group supply chain at Tier 1 supplier level. The outcome of the exercise revealed a map of the human rights risk carried in certain categories and countries, which we are addressing based on the results.

This procurement risk mapping revealed some high and severe risk categories of industry / sector, in particular medical supplies, company vehicle fuel, furniture, office refurbishing, waste electrical and electronic equipment, waste solid and liquid and water. However, it is worth noting that the above categories are not so-called "core" Atos spend categories.

We added a risk score to each of the countries where Atos Group supply chain is located and obtained a list of high, severe, and medium risk countries.

Using the individual list of high and severe categories and the individual list of high, severe and medium risk countries, we then narrowed down the spend and the suppliers falling into these categories and the identified three countries at high risk with spend in the above categories i.e. Turkey, India, and the Philippines.

Based on this country and category pairings, it resulted that 0.02 % of Atos Group Tier 1 suppliers fall into the severe-risk area and 2.35% falls into the high-risk area. Moreover, based on the selected category/country pairs the affected spend is equal to €1,25M which relates only to 6 suppliers.

Those suppliers are small, non-strategic suppliers and were originally not in scope for an EcoVadis assessment. As they have been identified as suppliers in the high-risk category/country pair, we have invited those suppliers to take part in the EcoVadis assessment in order for the Atos Group to gain insight to their CSR programs.

Also, to cover the basics, these vendors were subject to the Group Compliance world-check tool for additional checks on a wider scope, including criminal offences, but no findings resulted from this check.

Once the EcoVadis assessment will be completed, a corrective action will be issued to these suppliers to ensure they mitigate any risk activities.

Atos Group will run a similar exercise of risk mapping at least once a year to monitor the spend within these country/category pairs as the country and category risk levels don't change significantly in a short period of time.

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

## Due Diligence

Sustainability, which includes labour practices and human rights, is one of our key supplier evaluation criteria when selecting new partners, suppliers or subcontractors, representing up to 20% of the scoring used in annual supplier performance surveys and also e-sourcing events. Our suppliers are asked to demonstrate their maturity on CSR themes by submitting any existing and globally recognised accreditation and certification. All new suppliers are also screened via a tool aiming at checking whether governmental sanctions are imposed on them. In case of findings, the request is sent to Group Compliance for the above-mentioned world check tool. Also, if an area of concern is identified, and always depending on the supplier product/service and geography, our procurement managers, accompanied by the relevant subject matter experts, may choose to proceed with a physical audit of the supplier's facilities and operations or may request further details and documentation to eliminate any concerns before progressing any further with the specific supplier.

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

## EcoVadis' assessment

In addition to the initial due diligence, since 2009, Atos is using EcoVadis, a specialist assessor of sustainability in global supply chains, to proactively monitor and evaluate in depth its suppliers' portfolio in four key areas: environment, labour practices and human rights, fair business practices as well as sustainable procurement.

The area focusing on labour practices and human rights is described by EcoVadis as below:

**"The criteria in this theme are divided into 2 parts: first on human resources (such as health & safety, working conditions, structured social dialog, career management & training) and secondly on human rights issues (such as child & forced labour and discrimination)."**

Moreover, it is worth noting that the EcoVadis assessment covers human trafficking and debt bondage criteria.

In addition to the labour practices and human rights section, EcoVadis also assesses the supplier's own procurement practices, giving us insights regarding their expectations towards possible Atos Tier 2 suppliers.

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

As a result of this EcoVadis assessment, in 2020 Atos has initiated Corrective Action Plans ("CAP") via the EcoVadis platform to 100% of suppliers with score below 40 out of 100. In this way, Atos asks the suppliers to put more effort in the areas that were flagged by EcoVadis as needing improvement. We continuously follow up on the CAP status and scorecard renewals of these suppliers to see if there is any actual improvement. If the vendor shows no capability to improve and no mitigation strategy has been proposed and agreed among all key parties, Atos can decide not to renew the contract or even terminate it early.

In 2020 only 2% of the total Atos Group spend was covered by suppliers who scored below 40 overall and also had a partial score below 40 in the topic of labor practices and human rights.

As per the Atos Global Procurement Sustainability Strategy, scores below 40 refer to some level of risk and we expect the affected suppliers to implement the suggested corrective actions to improve their scores.

In 2020 EcoVadis granted "Platinum" status to the Atos Group for its Corporate Social Responsibility performance, confirming its leadership position in the IT Industry in respect of CSR themes.



# Effective actions taken to address modern slavery

## Disclosure of identified instances of modern slavery

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

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

More recently, EcoVadis alert system has flagged a supplier who may have breached labour rights, in relation to long contractual hours and unfair pay practices. Since this is one of our strategic suppliers, a consultation has been arranged to understand the extent of these labour violations, if there is any risk related to Atos and its operations as well as what measures have been put in place to mitigate the situation. Based on the outcome of the consultation, next steps will be agreed with the supplier to rectify the situation in a timely manner.

## Company-level grievance mechanisms

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

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

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

## Publication of KPIs

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



### Number of employees trained to the Code of Ethics e-learning:

UK target of employees to be successfully trained to the Code of Ethics e-learning is 90%. The 2020 report shows that 93% employees in the United Kingdom have been trained to the Code of Ethics e-learning.



### Number of suppliers and related level of spend subject to an EcoVadis assessment:

The Atos Group target is to ensure that, by end of 2021, 100% of strategic suppliers and the top 250 suppliers by global spend would have undertaken an EcoVadis assessment. The year 2020 closed with 327 suppliers (292 in 2019) having a valid EcoVadis assessment, which represents 62% of Atos Group global spend compared to 56% the previous year.



### Number of suppliers with corrective actions initiation requested by the Atos Group:

In 2020, 41 suppliers with a poor EcoVadis score (i.e. below 40) had Corrective Action Plans initiated against them compared to 52 suppliers in 2019.



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

All new employees must complete it within three months of joining. Compliance with this training requirement is consistently over 90%, fluctuating with the number of new joiners and the point at which they complete the training.

In 2018, a revised version of the Code of Ethics was launched and all employees were required to retake the training. The new version of the Code of Ethics requires employees to retake the training according to the updated version.

In addition, managers are required to perform a Code of Ethics in-depth training program (called 'ETOS') which aims at reinforcing ethics conduct with a tone from the top perspective.

In 2020, Atos supplemented the Code of Ethics training with a new specific training course on 'Modern Slavery'. This is mandatory for all current UK&I employees and new joiners. The e-learning course explains our commitment to reducing modern slavery and the steps Atos is taking to tackle it in our organisation and within our supply

chain. It helps employees understand different types of modern slavery, how they can be identified and explains the actions we expect people across our business to take to reduce the risk of modern slavery. It also provides links to speak up options in the event that employees wish to raise concerns. By the end of 2020, nearly 6,000 Atos employees (72% of the workforce) had completed the 'Modern Slavery' training.

Incorporating feedback from the 'Modern Slavery' employee training, we have now developed a new version to be shared with our supply chain, with a bespoke Modern Slavery e-learning training package available on a platform that can be accessed by all Atos suppliers in the UK. We will be writing to higher risk suppliers to prioritise their completion of the training and will follow up with other categories of suppliers.

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



# Closing statement

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

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

Signed



**Clay Van Doren**  
CEO Atos UK&I  
June 2021



**Richard Holland**  
CEO Atos BPS Limited  
June 2021





# About Atos

Atos is a global leader in digital transformation with 105,000 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 operates under the brands Atos and AtosSyntel. Atos is a SE (Societas Europaea), listed on the CAC40 Paris stock index.

The purpose of Atos is to help design the future of the information space. Its expertise and services support the development of knowledge, education and research in a multicultural approach and contribute to the development of scientific and technological excellence. Across the world, the Group enables its customers and employees, and members of societies at large to live, work and develop sustainably, in a safe and secure information space.

Find out more about us

**atos.net**

**atos.net/careers**

Let's start a discussion together



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