

# **Declaration of Principles on Human Rights and Environmental Due Diligence**

**the**

**Atos Information Technology GmbH  
and their affiliated companies**

## Declaration of Principles on Human Rights and Environmental Due Diligence

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To successfully shape the constant change in information technology, we are committed to the sustainable transformation of our company.

For us, sustainability means creating lasting value while taking social and ecological aspects into account: for customers, employees, investors, as well as for business partners and society. With our sustainable corporate strategy, we have consistently anchored this in our core business.

For us, compliance with human rights and environmental due diligence obligations is an elementary component of responsible corporate governance. Our goal is to ensure that human rights and environmental due diligence requirements are met in all our Group companies and also by our partners and suppliers.

The goal is clear: We want products and services that have been manufactured and provided without violating human rights or environmental obligations. With the following policy statement on compliance with human rights and environmental due diligence obligations, we are once again making an emphatic and binding commitment to this. It reaffirms our commitment to respect human rights as set out in the

- the International Bill of Human Rights,
- the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and
- the United Nations Guiding Principles on Business and Human Rights.

This policy statement complements and fleshes out our Atos Code of Ethics regarding human rights and good working conditions.

Our clear commitment to respecting human rights forms the foundation. Even more important, however, is the implementation of effective procedures and measures to actively protect human rights. As part of the Atos Corporate Social Responsibility (CSR) strategy, we have developed a due diligence approach to fulfill our commitment to respect and protect human rights and the environment in all our business activities. This approach provides the framework for putting this policy statement into practice. It aims to identify and avoid risks and potential negative impacts of our business activities on human rights and the environment at an early stage.

As a risk-based approach, the CSR strategy is applied both in our supply chains and in the Group companies we control. In the future, we will continue to review our approach to protecting human rights and the environment to take account of new developments.

We are convinced that we can only be successful in the long term if we live up to our corporate responsibility to respect human rights and environmental due diligence locally and globally in equal measure. This policy statement is another important step in this direction. It is up to each one of us to put this Statement of Principles into practice and lead our company into a sustainable future in every respect.

We thank you for your support!

## 1 Introduction

This declaration contains and supplements the principles of our Code of Ethics. As a participant in the United Nations Global Compact, we are committed to respecting human rights, respecting the rights of employees and their representatives, and protecting the environment. At Atos, we respect internationally recognized human rights and pay particular attention to the rights of vulnerable groups. As part of this, we are committed to complying with the following international standards, among others:

- Universal Declaration of Human Rights
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights
- International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- United Nations Guiding Principles on Business and Human Rights
- 10 Principles of the UN Global Compact
- OECD-Guidelines for Multinational Enterprises
- Minamata Convention
- Stockholm Convention
- Basel Convention

At Atos, we are committed to preventing, eliminating and minimizing negative impacts on human rights and the environment in our global operations wherever possible, and to promptly remedying any potential violations. Beyond Group companies, we are committed to ensuring that business partners, particularly direct suppliers, also respect human rights and the environment, in line with the United Nations Guiding Principles on Business and Human Rights, and we work to ensure that indirect suppliers also do so and take appropriate action. With our due diligence approach, we fulfill our human rights and environmental due diligence obligations and involve various relevant stakeholders in the process.

## 2 Human rights

At Atos, we place particular emphasis on human rights and good working conditions, both in our own Group companies and among our suppliers and business partners. We are committed to respecting internationally recognized human rights and reject all exploitative working conditions.

### 2.1 Prohibition of child labor

Atos rejects all forms of child labor as defined in the relevant ILO Conventions and is committed to the effective abolition of child labor. All Atos employer practices shall at a minimum comply with the above ILO Conventions. Children must not be hindered in their development. Their dignity must be respected, and their safety and health must not be jeopardized but protected by appropriate measures.

### 2.2 Prohibition of forced labor

Atos rejects forced or compulsory labor and any form of slavery, including modern forms of slavery and human trafficking. All Atos employer practices shall at a minimum comply with the ILO core labor standards. All employment relationships are voluntary and may be terminated with reasonable notice.

### 2.3 Freedom of association, right to collective bargaining and right to strike

Atos recognizes the right of employees to form employee representative bodies, to engage in collective bargaining to regulate working conditions and to exercise the right to strike. The formation, joining or membership of a recognized trade union shall not be used as a reason for unjustified unequal treatment or retaliation. In organizing campaigns, the company and management must remain neutral; the unions and the company must ensure that employees can make a free choice.

Atos shall ensure that employees in unions and employee representative bodies can openly and regularly communicate with management about working conditions in accordance with applicable law. Cooperation with employees and trade unions is constructive and a fair balance is sought between the economic interests of the company and the interests of employees. The behavior and tone toward employees is characterized by respect and fairness. Even in the event of contentious disputes, the aim remains to maintain sustainable constructive cooperation in the long term.

### 2.4 Equal opportunities and protection against discrimination

Atos is committed to maintaining equal opportunities for employees and to refraining from any form of discrimination. We stand for the fair treatment of all employees and do not tolerate any form of discrimination or unjustified unequal treatment, for example on the basis of characteristics such as gender, ancestry, origin and nationality, religion and world view, political, social or trade union activity, sexual identity and orientation, physical and/or mental limitations or age. Diversity & Inclusion are part of Atos' corporate strategy.

### 2.5 Right to health and safety at work

As an employer, we ensure occupational safety and health at least within the framework of applicable laws and support continuous development to improve the working environment with the aim of having no company-related accidents and illnesses.

We have guidelines and directives on occupational safety and health that are valid throughout Germany. They describe the structure, operation and continuous improvement of our occupational health and safety management system. To ensure this, company representatives, employees, occupational safety specialists and employee representatives at all sites work together regularly,

closely and constructively. We promote the preventive approach, according to which occupational accidents and illnesses are fundamentally avoidable. High technical and operational safety standards are the basis for our work. We comply with occupational safety regulations. The occupational safety regulations also apply to the use of employees from outside companies (e.g. temporary workers).

## **2.6 Working hours**

At Atos, the principle is that working hours comply with legal requirements or industry standards. We ensure that working conditions are safe and healthy, that work breaks, reasonable limits on working hours and regular paid leave are provided, and that applicable international standards on working time, or at least the relevant ILO conventions, are complied with at the place of employment.

## **2.7 Remuneration and benefits**

We respect international standards such as the principle of equal pay for work of equal value regardless of gender, as well as fair and good working conditions. In particular, we are committed to fair pay that is at least equal to the applicable fixed minimum wage and, in addition, provides our employees with at least a living wage. Withholding the appropriate wage is not permitted.

## **2.8 Education and qualification**

At Atos, we promote the training and qualification of all employees to enable a high level of performance and high-quality work. Accordingly, we accompany all important phases of employees' individual training and career paths with comprehensive training and development programs and support measures. In this way, we contribute to the employability of all employees in line with the concept of lifelong learning.

## **2.9 Protection of local communities and indigenous peoples**

Atos respects the rights of local communities and indigenous peoples who may be affected by operations at our sites and considers the local impacts of our operations<sup>1</sup>.

## **2.10 Human rights protection in the use of security forces**

When we deploy our own security personnel to protect our operations, they are bound by respect for human rights and our Code of Ethics. When we engage security service providers to protect our operations, we must ensure through appropriate policies and measures that they are trained, and respect internationally recognized human rights when deployed.

### 3 Environment

We acknowledge our responsibility to protect the environment and are aware of the potential impact of our products, production and procurement processes on the environment and people. We therefore observe the environmental due diligence obligations in our Group companies and towards our suppliers and business partners.

We strive to achieve an exemplary environmental and energy balance and are committed to acting in an environmentally friendly manner in all our activities and to the careful use of resources as well as the efficient and economical extraction of raw materials to avoid or continuously minimize negative impacts on the environment.

To this end, we have established environmental management systems at all our main sites and conduct regular environmental risk analyses at our locations. In addition, we define clear overarching environmental standards and targets and make our environmental impacts transparent both internally and externally. Should any environmentally relevant incidents occur at Atos sites, we take remedial and preventive measures to avoid a recurrence. Through the technological development of our own products, we pursue the goal of reducing the impact of emissions and resource consumption on the environment. It is our ambition to become CO<sub>2</sub>-neutral for our fleet of new passenger cars. We also consider measures for environmentally friendly and energy-efficient product design and analyze the environmental impact - from raw material extraction through production and use to recycling. We also review our operations for compliance with regulations in production, such as the collection, storage, recycling and disposal of hazardous materials and waste. Compliance with the requirements of the Minamata, Stockholm and Basel Conventions is a matter of course for us<sup>2</sup>.

## 4 Human rights and business strategy

We have underpinned our human rights approach with measurable metrics. We fulfill our human rights due diligence obligations based on requirements from internationally recognized standards, applicable laws and regulations, and our shared understanding of values at Atos. In implementing our approach, we consider the interests of our employees and other stakeholders who may be directly affected by our economic activities in a protected legal position. We systematically assess, on a risk basis, whether human rights are respected in the Group companies we control and in our supply chains, and implement a variety of measures to prevent and, where possible, end or minimize negative impacts on human rights and the environment in our global operations. We continue to evolve our approach, including when a risk assessment is conducted due to a new activity or business relationship, prior to strategic decisions or changes in business operations. We also involve external stakeholders and experts in further development and monitoring.

### 4.1 Atos and controlled Group companies

As part of the CSR strategy, the values and objectives in the areas of human rights and the environment are reviewed and defined in an annual cycle. In addition, a human rights and environment-related risk assessment is carried out annually and applied in all controlled Group companies. The aim of this assessment is to determine the individual risk of our controlled Group companies.

Based on the results of the risk assessment, measures are taken for the controlled Group companies that address the individual results of the risk assessment. Responsibility for implementing these measures lies with the respective unit.

The introduction of the risk assessment and the implementation of the measures derived from it are accompanied by appropriate communication and targeted training involving all relevant employees.

### 4.2 Business partners and suppliers

We have formulated our demands and expectations of business partners and suppliers in the Atos Partners' Commitment to Integrity (Atos PCTI). Business partners are all those who do business with us. We and our partners respect and support the observance of internationally recognized human rights, attach particular importance to the rights of the International Bill of Human Rights and the ILO core labor standards, and are committed to ensuring that no human rights violations occur during the business relationship, including in relation to other business partners and suppliers.

For us, compliance with these standards is a prerequisite for successful cooperation. Before concluding contracts with new business partners, we therefore conduct a transparent and risk-oriented integrity check to the extent permitted by law. Even after the conclusion of a contract, compliance with legal requirements by our partners is mandatory. We clarify any integrity concerns or possible violations of the law and/or the Atos PCTI, we clarify these together with our business partner. If these cannot be clarified, we initiate appropriate measures, which also include legal steps and may lead to the termination of the business relationship. We expect our business partners to communicate the applicable laws as well as the contents of the Atos PCTI and the resulting requirements to their employees. We also consider our business partners to have a duty to communicate the contents of the Atos PCTI to their suppliers and to work towards compliance with them.

### 4.3 Commitment and compliance

This policy statement has been adopted by the management of Atos in Germany as a binding basis for the implementation of the core elements of human rights and environmental due diligence within Atos (Germany-wide). It is binding for all managers, division heads and employees of Atos as well



as all controlled companies of the Atos Group in Germany and names contact persons to whom business partners, customers and employees can turn in individual cases.

The Human Rights Officer of Atos Germany also pays attention to compliance with this policy statement during his audits and includes it in his audit criteria. The Management Board regularly reports to and consults with the Group Works Council of Atos on the perception of social responsibility in the company and the implementation of this Declaration of Principles.

#### **4.4 Communication and publicity**

This declaration will be made available to all our employees and their representatives in an appropriate form and published.

#### **4.5 Control**

The management of Atos Germany is responsible for the overarching activities on human rights and environmental protection. The management of Atos Germany continues to develop the topic in accordance with its own target agreement together with the purchasing departments, is regularly informed by the Human Rights Officer and the responsible departments about activities to comply with human rights and environmental due diligence obligations and receives corresponding reports.

Our procurement units also inform Purchasing and the members of the Executive Board directly responsible for the respective units about their respective measures to comply with human rights and environmental due diligence obligations.

The entire Supervisory Board is also informed by the Executive Board in regular meetings about sustainability issues, including human rights and environmental protection.

#### **4.6 Dealing with breaches of this policy statement**

Employees and external third parties can report suspected violations of human rights and environmental due diligence and seek redress through various channels. These channels include our whistleblowing system at Atos. The whistleblowing system is open to all employees, business partners and third parties who wish to report violations.

The Whistleblower Policy sets the standard for the assessment as well as the consequences of breaches of rules. It is intended to ensure a fair and transparent procedure that considers both the principle of proportionality for the person concerned and the protection of the whistleblower. The whistleblower system is accessible in various languages by e-mail or via a reporting form on the Internet.

Whistleblowers can enter specific information about breaches of rules in connection with Atos into the whistleblower system. After receipt of the tip, a risk-based initial assessment of the possible violation is made. If the suspicion is confirmed, proportionate and appropriate measures will be initiated. If a violation of this declaration is attributable to individual employees, labor law measures may be the consequence. Violations of the content of this declaration will be punished in accordance with our internal regulations on breaches of rules.

#### **4.7 Contact, questions and information**

Questions and comments regarding this Statement or other human rights issues may be directed to the Atos Human Rights Officer by email at [gmde-sustainability@atos.net](mailto:gmde-sustainability@atos.net). Complaints or reports of non-compliance with this statement may be directed to the Whistleblower System at [gmde-compliance.germany@atos.net](mailto:gmde-compliance.germany@atos.net) of Atos Germany.

#### **4.8 Other**

This policy statement shall enter into force upon signature. No rights of individuals or third parties may be derived from this policy statement. This policy statement has no retroactive effect.

This policy statement will be reviewed and revised on a regular and ad hoc basis according to the results of the risk analysis.

#### **4.9 Audit and regular reporting**

Atos will report annually on its supply chain due diligence, including a detailed description of our actions to mitigate identified risks and their effectiveness.