

Atos modern slavery statement

for year ended 31st December 2022



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 companies¹ (“Atos”) have taken during the year ending 31 December 2022 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 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 joined the Modern Slavery Council of the Business Services Association (BSA), a policy and research organisation for the business services sector, and developed modern slavery training available to our 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.

¹This statement sets out the steps taken by Atos IT Services UK Limited, Atos UK International IT Services Limited, Atos BPS Limited, Engage ESM Ltd and Cloudreach Europe 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. 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 different markets and industries, including resources and services, public sector and defence, healthcare and life sciences, telecom, media and technology, manufacturing and financial services and insurance.

In the United Kingdom, with around £1 billion annual third party spend and approximately 72 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 vast majority of the Atos UK&I supply chain spend (99%) is mainly located in 19 low-risk countries across the United Kingdom (UK), the rest of Europe and North America.

In 2022 we spent 92% with suppliers located in the United Kingdom.

In 2022, IT requirements spend made up the greatest part of purchases (56% of demand) the majority of which was made with the largest IT Tier 1 suppliers. Subcontracting and manufacturing was the second largest source of procurement spend with 32%, while the remaining spend was related to so-called 'indirect' spend including mobility, professional services, facilities management, and real estate.

92%

spend in 2022 was with suppliers located in the United Kingdom

80%

72 suppliers represent 80% of the spend for services and products in the United Kingdom

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. The main objective is 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

Since 2003, Atos Group² has set up its [Code of Ethics](#), publicly available and regularly updated, which all Atos employees worldwide are required to train on annually and adhere to in their working practices. The Code introduced Atos' "Sense of Purpose" which is to help design the future of the information space, enabling its customers, 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 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.

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

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 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 the Atos [Universal Registration Document](#) which is publicly released and updated every year.



Global Ethics and Compliance Policy

Atos Group has implemented for several years “a Global Ethics and Compliance Policy”, forming the framework of the “Atos Compliance Management System” which is designed to ensure that Atos Group operates in an ethical manner. This Policy provides guidance on ethics and compliance notably regarding human rights, among 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.

Updated at the beginning of 2023, 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 the entities under their supervision:

- measures are in place within the organisation to comply with the Modern Slavery Act 2015;
- employees are fully aware of Atos’ commitments concerning the protection of human rights and that all their activities comply with applicable local laws in relation with human rights;
- 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;
- 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.

Human Rights Policy Statement

Atos Group has 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

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. This 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 the Procurement team and every new member 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

In 2022, Atos released a new version of the [Atos Partner's Commitment to Integrity](#) which establishes requirements that every Atos supplier has to comply with in four areas: human rights, health and safety of individuals, business integrity and environmental impact.

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 that Atos business partners, including suppliers, must support, respect, and encourage to be respected within their supply chain.

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

By accepting the Atos Partner's Commitment to Integrity, each supplier also recognises Atos' right to perform on-site audits to ensure 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 Atos 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.

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

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 conflict minerals. As such, Atos works with its suppliers to verify that minerals are conflict-free, also using a due diligence supporting tool called 'Silicon Expert'. Silicon Expert delivers an environmental compliance management system and database, providing information on over 300 million parts from over 15,000 manufacturers.

In the Atos' 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 due diligence processes to ensure that their products are responsibly manufactured and do not contain conflict minerals.

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, Atos Global Procurement 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, in particular medical equipment, company vehicle fuel, waste solid/liquid and waste electrical and electronic equipment and water. However, it is worth noting that the above categories are not so-called “core” Atos spend categories.

We have 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.

We mapped high and severe-risk categories against high and very high-risk countries, and then narrowed down the spend and the suppliers falling into these combinations.

Fifteen countries were identified as high or very high risk, with spend in the high or severe-risk categories: Algeria, Bulgaria, Burkina Faso, China, Côte d'Ivoire, Gabon, Hong Kong, Hungary, India, Mexico, Morocco, Philippines, Romania, Senegal and Turkey.

Based on this country and category combination, we confirmed that a tiny percentage of Atos Group Tier 1 suppliers fell into the severe and high risk areas (0.000076 % and 0.00867% respectively).

As a follow-up action of the risk 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 the Compliance Catalyst tool. The tool screens the suppliers for compliance checks on a wider scope, including criminal offences, but so far, no findings resulted from this check.

Atos Group Procurement will run a similar exercise of risk mapping at least once a year internally and we aim to conduct a similar exercise once every three years with a third-party expert to monitor the spend within these country/category pairs.

In order to further appreciate the risks related to human rights abuse within the business, the Atos legal community from global and local entities conducts a Legal Risk Mapping exercise every two years, 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 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 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 aimed at checking whether governmental sanctions are imposed on them. In case of findings, the request is sent to Group Compliance for the above-mentioned 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 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. 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 audits, Atos considers modern slavery at all stages of procurement, from identification of a requirement to delivery.

In 2022, a new question regarding human rights related processes and initiatives (including modern slavery) have been added to the supplier onboarding questionnaire. Also in 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.

EcoVadis' assessment

In addition to the initial due diligence, Atos uses EcoVadis to proactively monitor and evaluate in depth a supplier 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 dialogue, career management & training) and secondly on human rights issues (such as child & forced labour and discrimination).”

The EcoVadis assessment also covers human trafficking and debt bondage criteria.

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

Specifically, the EcoVadis methodology framework assesses the policies and measures put in place as well as the reporting published by companies with regards 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.

In 2022 1% of the total Atos spend was covered by suppliers, who scored below our threshold of 40 overall via the EcoVadis platform and also had a partial score below 40 in the topic of 'Labor Practices' and 'Human Rights'.

As a score below 40 indicates some level of risk, we expect the affected suppliers to implement suggested corrective actions to improve their scores. In 2022 we initiated Corrective Action Plans (CAP) for all those suppliers. We are following up the CAP statuses and scorecard renewals of these suppliers to monitor improvement. If the vendor shows no capability to improve then we will reassess the risk with the option to remove the supplier.

Additionally, in 2022, Atos included the valuable assessment of other agencies similar to EcoVadis, (such as Responsible Business Alliance (RBA), Sedex, EcoDesk, Achilles, Integrity Next, DJSI, Sustainalytics, MSCI, B-Corp Certification) which also monitor the performance of Atos' supplier companies in 'Human Rights'.

We include the percentage of strategic suppliers (top 250) assessed using EcoVadis (or an alternative assessment) as a core CSR Global Key Performance Indicator. We achieved 76% in 2022, an increase on 61% in both 2020 and 2021.

In 2022 Atos Group retained the "Platinum" status for its own Corporate Social Responsibility performance, confirming its leadership position in the IT Industry in respect of CSR.

Effective actions taken to address modern slavery

Disclosure of identified instances of modern slavery

Since 2018 EcoVadis has supplied us with 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.

In 2022, there were no alerts regarding possible human rights violations.

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.

The Atos Whistleblowing Policy includes clear and specific guidance on modern slavery. We have clearly stated our commitment to tackling modern slavery and we have created and communicated 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. There were no whistleblowing cases reported in 2022.

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.

Attendance of the Modern Slavery Council of the Business Services Association

Mindful of the importance of multi-stakeholder partnerships and industry initiatives, since October 2022, Atos joined the bi-monthly meetings of the Modern Slavery Council of the Business Services Association (“BSA”), a policy and research organisation for business services providers across the private and public sectors.

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, one of the Council’s goals is to develop a common ‘toolkit’, or other training material, for industry and suppliers to ensure a consistent approach and respect of minimum standards.



Collaboration with a non-governmental organization

In 2022 Atos decided to start the selection process to collaborate with an independent third party, possibly a non-governmental organisation, to assess the level of maturity of its initiatives, conduct a gap analysis and adopt even more practical and relevant actions to further advance its approach to address modern slavery risks, also in the spirit of the possible upcoming changes to the modern slavery legislation.

Publication of KPIs

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

- **number of employees trained to the Code of Ethics e-learning:**
In 2022, 89% of Atos employees in the United Kingdom completed the updated e-learning on the Code of Ethics, which includes a dedicated section on human rights, and combines an interactive approach with lessons, actual scenarios, and a final test.
- **number of suppliers and related level of spend subject to an EcoVadis assessment:**
The Atos Group target is that, by end of 2022, 70% of its global spend will be from suppliers who have undertaken an EcoVadis (or alternative) assessment. In 2022 we successfully achieved that target.
Of the 250 strategic suppliers to Atos, 190 were scored or reassessed by EcoVadis representing 76% of our strategic suppliers.
- **number of suppliers with corrective actions plans requested by the Atos Group:**
In 2022, 46 suppliers (covering 1% of spend) had an EcoVadis score below our threshold of 40. All 46 (100%) had Corrective Action Plans initiated against them.



Training

The Code of Ethics Policy has formed part of Atos Group employees' employment contracts since 2011.

Atos requires all employees, regardless of their position, to complete an annual e-learning course that explains the principles of the Code of Ethics and includes a quiz to ensure understanding. All new employees must complete it within three months of joining. The course is updated annually to reflect any additions or updates in the Policy and Atos mandates re-taking of the training every year to ensure that all employees have an up-to-date knowledge of these fundamental principles.

In addition, managers are required to complete an in-depth Code of Ethics training program (called 'ETOS') which reinforces ethics conduct from a leadership perspective, helping managers to set the right tone from the top on areas such as human rights topics or how to encourage people raising alerts.

Atos supplements the Code of Ethics training with a specific training course on 'Modern Slavery'. This 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 should employees wish to raise concerns. This training is accessible to all current UK&I employees, and between 2020 and 2022 82% of the Atos current workforce in the UK completed the training. Building on the 'Modern Slavery' employee training, we have developed a version for our supply chain, with a bespoke Modern Slavery e-learning training package available on a platform that can be accessed by Atos suppliers in the UK.

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, Engage ESM Ltd, Cloudreach Europe Limited and Atos BPS Limited.

Signed



Clay Van Doren
CEO Atos UK&I

June 2023



John Ainsworth
CEO Atos BPS Limited

June 2023



Matthew Middleton
CEO Engage ESM

June 2023

Atos is a global leader in digital transformation with 111,000 employees and annual revenue of c. € 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



Atos