

Summary of the Communication on Progress 2018 and concordance with the Integrated Corporate Responsibility Report of Atos

For the sixth year, Atos has elaborated an Integrated Corporate Responsibility Report composed of two documents, which received the Global Reporting Initiative's highest transparency and exhaustiveness recognition level (GRI Standards):

- The Registration Document which is the document for investors' community and official registration to the French Autorité des Marchés Financiers. It contains the whole set of KPIs aligned with the GRI Standards, and the results of materiality assessment, fully integrated with the financial statement of Atos.
- The Corporate Responsibility Report (CR Report) which engages Atos for general public. It contains the main Key Performance Indicators (KPIs), highlighting key initiatives and cases studies, and the GRI Standards Content Index Table.

1. Statement of continued support by the Chief Executive Officer

The commitment to support the Global Compact is reported in the Registration Document 2017 (especially G.5.1) and in the CR Report; in addition, the Atos Group CEO & Chairman is renewing Atos' ongoing commitment to the initiative and its principles by letter to the United Nations Secretary General, to be published on the Global Compact's website.

2. Human Rights

• Assessment, policy and goals

*Description of the relevance of human rights for the company (i.e. human rights risk-assessment).
Description of policies, public commitments and company goals on Human Rights.*

The materiality assessment in line with AA1000 SES (2011) standard, performed in 2017, has defined the GRI Standard aspects which are material for us. Human Rights aspect was not considered as material (methodology explained in D.1.3 of the 2017 Registration Document).

Nevertheless, Atos ensures the respect of Human Rights internally (statement in D.2.2.1 of the 2017 Registration Document and the publicly available [Atos Human Rights Policy](#)) and toward its partners: all business partners are requested to adhere to the respect of the Human Rights, as the other principles listed in the UN Global Compact, by signing the new Business partner's commitment to integrity. Furthermore, Business Partners such as agents or external consultants must undergo an automated screening on ethics and compliance, which include a checking of the practices regarding Human rights.

• Implementation

Description of concrete actions to implement Human Rights policies, address Human Rights risks and respond to Human Rights violations.

The materiality assessment in line with AA1000 SES (2011) standard, performed in 2017, has defined the GRI Standard aspects which are material for us. Human Rights aspect was not considered as

material (methodology explained in D.1.3 of the 2017 Registration Document).

Nevertheless, Employees can use any tool to report potential claims, such as hierarchy, employee representatives, external auditors, public authority.

Atos' alert system enables any employee that believes that a law, regulation, one of the principles stated in the Code of Ethics has been or is about to be breached to report it. The Atos Code of Ethics clearly states that any employee who reports fairly may not be subject to any penalty or retaliatory measure or discrimination, provided that he/she acted in good faith and without the intention to cause harm, even if the events relating to the alert prove inaccurate or no action is subsequently taken. If necessary, the employee's protection may be assured, on his/her request, by mobility within the Group.

Atos has developed a partnership with Ecovadis, to assess its suppliers regarding compliance with the 10 principles of the Global Compact, including Human Rights requirements. The majority of suppliers assessed through the Ecovadis assessment are not located in countries which are identified as risky.

Suppliers must respect the Atos Sustainable Supplier Charter which is going to be replaced by the Business Partner's commitment to integrity (covering human rights, labor, environment and anti-corruption). They are assessed by EcoVadis on their Corporate Responsibility performance at any time during their contract with Atos.

EcoVadis assessments are done on four levels: Environment, Labor practices, Fair business practices and Supply chain. Suppliers are asked to answer to a detailed questionnaire about their engagement and required to provide documents supporting their answers.

The Purchasing rules concerning suppliers' selection and evaluation criteria (QCDIMS) include 10% rating on sustainability.

Measurement of outcomes

Description of how the company monitors and evaluates performance.

The materiality assessment in line with AA1000 SES (2011) standard, performed in 2017, has defined the GRI Standard aspects which are material for us. Human Rights aspect was not considered as material (methodology explained in D.1.3 of the 2017 Registration Document).

In 2017, 181 suppliers have been scored or reassessed by EcoVadis (taking into account the compliance with Human Rights standards) representing 54% of the total spend and 52% of our strategic suppliers [A17] and [GRI 205-1].

3. Labour

- **Assessment, policy and goals**

Description of the relevance of labour rights for the company (i.e. labour rights-related risks and opportunities). Description of written policies, public commitments and company goals on labour rights.

The materiality assessment in line with AA1000 SES (2011) standard, performed in 2017, has defined the GRI Standard aspects which are material for us (methodology explained in D.1.3 of the 2017 Registration Document). The following GRI Standard labour aspects are considered as material:

- Employment;
- Training and Education;
- Diversity and Equal opportunity;
- Equal remuneration for women and men.

These aspects respond to the first challenge of Atos: being a responsible employer, attracting and nurturing talented people from diverse backgrounds, promoting collaborative working and well-being at work.

HR policies in Atos ensure the respect of Labour rights, and of highest standards (e.g. minimum wage higher than the local one, diversity, collective bargaining, etc). In all the countries where it is necessary, the social dialogue with work councils is strictly respected. In addition, Atos has built an European Work Council, became the Societas Europaea Council in 2013, which is consulted for any major event related to Atos. Atos has also created a committee called the Participation Body so that employee representatives from the Societas Europaea Council could discuss and share information on strategic and critical topics discussed at the Atos Board of Directors.

Business partners are requested to adhere to the respect of the labour rights, as the other principles listed in the UN Global Compact, by signing the Business partner's commitment to integrity. They must also undergo an automated screening on ethics and compliance, including respect of Labour regulations.

In addition, the Integrated Corporate Responsibility Report 2017 mentions Atos actions related to Labour, with express reference to UN Global Compact principles and the UN Sustainable Development Goals in the GRI Standards Content Index Table (Registration Document D.2; CR Report "GRI Standards Content Index Table").

- **Implementation**

Description of concrete actions taken by the company to implement labour policies, address labour risks and respond to labour violations.

Atos ensures that a continuous communication with employee representatives exists. Atos management regularly exchange with local and regional employee representatives, especially in the Societas Europaea Council, during 4 meetings in 2017. On top of organizing the meetings with Societas Europeas Council, the management and the Employees representatives have agreed to set up additional Commissions that work very closely with management in order to have productive, useful and profitable dialogue. (Registration Document D.2.3.2)

The Diversity Program contemplates five main dimensions: Gender, Cultural Diversity, Disability, LGBT+, and Generations to further develop of diversity initiatives and as a way to bring excellence in people management and to improve the Group's operational performance. The Program is sponsored by a Steering Committee with Group Executive Committee members. Throughout 2017, Atos has continued development of the Program with a clear focus on four main areas of action: "Engage" (establishing firm commitments to making this domain more and more visible), "Exchange" (listening to our staff and making the Diversity Program a program developed with and for the employees), "Embrace" (embedding Diversity in our Group's ways of working) and "Execute" with

the implementation of a substantial number of initiatives both at Group level (transversal campaigns) and in the geographies with a “Think Global, Act Local” approach. (Registration Document D.2.2.2)

Atos launched at the end of 2010 a global survey in order to measure the “Well Being at Work” initiative and employees satisfaction.

In 2017, 76 entities in 54 different Atos countries took part in the Great Place To Work (GPTW) survey, with 56,712 employees participating, representing 60% of the persons invited to take part to the survey (94,513 employees). Details in the Registration Document (D.2.3.2).

Training and education are a key priority, as well as career development: details are provided in the Registration Document (D.2.1.2).

- **Measurement of outcomes**

Description of how the company monitors and evaluates performance.

The Great Place to Work survey’s 2017 results show that in average 54% of responses to “Taking everything into account, I would say this is a great place to work” are positive or very positive.

In addition, the HR Reporting monitors the follow up of labour KPI, such as working conditions, actions for discrimination, etc. the full set of KPI is indicated in Registration Document D.2.4).

Please refer to the Corporate Responsibility Report 2017 (“People”).

4. Environment

- **Assessment, policy and goals**

Description of the relevance of environmental protection for the company (i.e. environmental risks and opportunities). Description of policies, public commitments and company goals on environmental protection.

The materiality assessment in line with AA1000 SES (2011) standard, performed in 2017, has defined the GRI Standard aspects which are material for us (methodology explained in D.1.3 of the 2017 Registration Document). The following GRI Standard aspects are considered as material:

- Energy;
- Emission;
- Product Responsibility compliance.

Protecting environment and limit Atos’ carbon footprint are ongoing challenges in Atos, which are divided in several concrete actions (Carbon intensity, Energy efficiency, and Environmental Management System (EMS) based on ISO 14001 Certification).

In 2017, the Science Based Targets initiative (SBTi) officially approved the Group’s intensity targets (tCO₂e per € million value added/operating margin) for 2021 and 2050.

Atos has developed a sustainable portfolio to assist clients in achieving environmental excellence. The goal is to help develop a low carbon economy by providing its customers with services and

solutions that combine energy efficiency, carbon reductions and financial savings. Atos innovates and delivers new sustainable technologies and solutions (smart solutions, green datacenters, and carbon neutral hosting...) that help its clients tackle both their business and environmental challenges. In particular, Atos' carbon-neutral hosting services enable its IT intensive clients (like banks, travel or digital service companies...) to drastically reduce their scope 3 emissions by writing zero (0) for the IT solutions they outsource with us. The solution is designed to help companies identify levers that can both reduce carbon emissions and achieve energy efficiencies. As a result, it combines carbon reduction and economic performance. The program addresses the entire lifecycle of an organization, process, product, data centers or IT for example (raw material extraction, manufacturing, transport, usage, end of life) and not only the energy consumption during the usage phase as it is often the case.

The Atos Integrated Corporate Responsibility Report mentions Atos actions related to Environment, with express reference to UN Global Compact principles in the GRI Standards Content Index Table (Registration Document D.5; CR Report "Environment" and "GRI Standards Content Index Table").

134 Atos sites were already certified ISO 14001 by the end of 2017.

- **Implementation**

Description of concrete actions to implement environmental policies, address environmental risks and respond to environmental incidents.

As examples of its "Environmental ambition", Atos went on implementing its actions towards greener data center, through virtualization of servers, cloud computing, reducing electricity consumption.

Specific actions have been taken:

Please refer to the Atos Integrated Corporate Responsibility Report where Atos actions related to Environment are reported (Registration Document D.5.; CR Report "Environment").

- **Measurement of outcomes**

Description of how the company monitors and evaluates environmental performance.

No claim regarding Environment was reported in the period covered by the COP.

The Atos headquarters in Bezons was the first office building in France to obtain the triple certification: HQE (high quality standard) for construction, HQE for operations and THPE (Very High Energy Performance).

After great achievement in carbon reduction between 2008 and 2015 (-50% both in intensity and absolute), Atos at the end of 2017 took a new public commitment: reduce its carbon intensity by 5 to 15% by 2020 (tCO₂e per € million revenue, 2016 base line, for operational scopes 1, 2 and 3A). At the end of 2017, the Group is on track. Carbon intensity figures (emissions per revenue or employees) are more significant than absolute figures to understand the trends and progress achieved at constant scope.

Please refer to the Atos 2017 Registration Document which contains Atos actions related to monitoring and evaluation of the environmental performance, (all set of KPI at this end of the section D.5).

5. Anti-Corruption

- **Assessment, policy and goals**

*Description of the relevance of anti-corruption for the company (i.e. anti-corruption risk-assessment).
Description of policies, public commitments and company goals on anti-corruption.*

The materiality assessment in line with AA1000 SES (2011) standard, performed in 2017, has defined the GRI Standard aspects which are material for us (methodology explained in D.1.3 of the 2017 Registration Document). The GRI Standard aspects “anti-corruption”, “compliance” and “procurement practices” are considered as material.

Principle of no corruption is expressly part of Atos Code of Ethics, which is distributed to all employees in the group, and available to third parties via Atos web site. A new mandatory web-based training on the Code of Ethics was launched in March 2017. It includes this issue of corruption and is followed by all Atos employees.

In 2017, Atos continued to provide the classroom training on the Code of Ethics for the managers: ETO²S training (“Ethics in Tier One Organization School) presents the responsibilities and the risks of non-compliance for Atos and for the managers, including in case of corruption, explains the main Atos policies and processes to ensure compliance with Anti-Corruption regulations, and gives concrete advices to be an ethical manager in the daily work.

Business Partners are requested to comply with Anti-Corruption regulations, as the other principles listed in the UN Global Compact, by signing the Business partners’ commitment to integrity before any conclusion of contract. Furthermore, they must undergo a screening on ethics behavior which includes due diligence and questions on potential links with political parties or place of payment for their services, and which needs to ensure ethical reputation of the partner on the market.

The Group Compliance validated a new Global Ethics & Compliance Policy in 2017, replacing more than 14 policies and procedures dealing with compliance matters in different areas including corruption. Combined with the Atos Code of Ethics, these form the framework of the governance of compliance and ethics at Atos.

Since 2012, an Ethics Committee, composed of independent and highly respected external professionals, has been tasked to strategize on the role of ethics generally, and particularly within Atos’ operations. In 2017, this Committee was consulted on the improvement of Atos Whistleblowing policy, to take into account the new legal requirements issued from French regulations Atos has to comply with.

Please refer to the 2017 Registration Document which reports Atos actions related to Ethics and prevention from corruption, for more information (D.4.2).

- **Implementation**

Description of concrete actions to implement anti-corruption policies, address anti-corruption risks and respond to incidents.

Since July 2013, a mandatory web-based training on the Code of Ethics for all employees has been launched, and explains in details what it is forbidden according to Anti-Corruption Regulations.

Awareness of corruption is an additional e-learning module on the Code of Ethics, mandatory for all employees. 2017 saw an increase in classroom training sessions for top managers covering the responsibilities and risks of non-compliance for Atos and its managers, and how Atos policies and processes safeguard compliance. In 2017, 91% of employees have been trained to the e-learning on the Code of Ethics.

In 2017, Atos stepped up its efforts to raise awareness of corruption. The 'Fight Against Corruption' training and certification program, based on the e-learning tool of the United Nations, became mandatory for all top managers across the Group. In particular, employees working in sales and procurement in certain countries where high risks of corruption are identified are also required to take this anticorruption training course.

Atos has established an alert system that grants the right for all employees to raise an alert in the event of a suspected non-compliance with the values and principles of the Code of Ethics, including corruption and bribery. With this alert system, any allegations of corruption detected within the Company can be reported to the Head of Compliance and/or to the Group Head of Internal Audit, who will launch the Internal Investigations procedure.

The policy on the Alert system is being reviewed in order to comply with all different national laws of the countries where Atos operates. It includes a section on Internal Investigations and ensures the respect of the whistleblower's rights. Such Internal Investigations are properly tracked at corporate level, and communicated to Group Executive Committee, through the annual review of internal investigations during a Group Compliance Steering Committee.

Please refer to the Atos 2017 Registration Document for more information on the awareness on corruption issue and other compliance topics (section D.4.2).

- **Measurement of outcomes**

Description of how the company monitors and evaluates anti-corruption performance.

For 2017, 15 alerts were reported and monitored at the Group Compliance level (Registration Document section D.4.2)

In 2017, no significant fine for non-compliance with laws and regulations were levied against the Group. No client or supplier claim related to corruption was levied against the Group.

Please refer to the Atos 2017 Registration Document for Atos actions related to Ethics and no corruption (Set of KPIs at the end of the D.4).