



Summary of the Communication on Progress 2019 and concordance with the Integrated Report of Atos

Atos has elaborated an Integrated Report composed of two documents, which constitute our Integrated Report and Communication on Progress:

- The Registration Document, with exhaustive information, which is shared with the market, by an official to the French regulator "Autorité des Marchés Financiers". This document contains the whole set of key performance indicators aligned with the GRI Standards – Comprehensive option, fully integrated with the financial statement of Atos.
- The Integrated Report, which is Atos official and public statement. This document contains the main key performance indicators and highlighting key initiatives and cases studies, as well as the GRI Standards Content Index table, referring to the ten principles of the UN Global Compact.

1. Statement of continued support by the Chief Executive Officer

The commitment to support the Global Compact is reported in the Registration Document 2018 (especially D.2.1, and D.2.4.1 where it is remembered the Atos adhesion since 2010) and in the Integrated Report where the link between the GRI indicators and the UN Global Compact principles are included by the Atos' in its reference to the information disclosed named "GRI Standards Content Index" (See page 70 to 79 of the Atos Integrated Report 2018). 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, reviewed in 2018, 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 2018 Registration Document).

Nevertheless, Atos ensures the respect of Human Rights internally (statement in D.2.4.1 of the 2018 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.

ATOS SE

River Ouest
80 quai Voltaire
95877 Bezons Cedex
France

Tél : + 33 1 73 26 00 00
Fax : + 33 1 73 26 00 01
www.atos.net

Siège social :
River Ouest – 80 quai Voltaire
95870 Bezons

Société Européenne au capital de 105 598 479 Euros
Siren : 323 623 603 RCS Pontoise
TVA intracommunautaire : FR 52 323 623 603

- **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, reviewed in 2018, 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 2018 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 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, reviewed in 2018, 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 2018 Registration Document).

In 2018, 138 suppliers have been scored or reassessed by EcoVadis (taking into account the compliance with Human Rights standards) representing 57.3% of the total spend and 55% of Atos' strategic suppliers.

3. Labor

- **Assessment, policy and goals**

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

The materiality assessment in line with AA1000 SES (2011) standard, reviewed in 2018, has defined the GRI Standard aspects which are material for us (methodology explained in D.1.3 of the 2018 Registration Document). The following GRI Standard labor 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 Labor 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 labor 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 Labor regulations.

In addition, the Integrated Report 2018 mentions Atos actions related to Labor, with express reference to UN Global Compact principles and the UN Sustainable Development Goals in the GRI Standards Content Index table (Integrated Report "GRI Standards Content Index").

- **Implementation**

Description of concrete actions taken by the company to implement labor policies, address labor risks and respond to labor 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 6 meetings in 2018. 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.2.5.2)

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 2018, Throughout 2018, Atos has continued development of the Diversity Program, offering webinars, mentoring opportunities, community outreach efforts, and book clubs that focus on our 5 dimensions, which include the following:

- Millennials Book Club: employee-led group that reads business-related books and meets to discuss them.

- Launch of additional employee affinity groups:
 - women in Germany: sponsored by a member of the Executive Committee, focused on developing women in the GBU,
 - AHShe: sponsored by IDM senior leadership, focused on development of women in the AHS division,
 - LGBT in France: focused on developing LGBT employees in France,
 - NAO Veterans: sponsored by Global Chief Diversity Officer, focused on developing veterans in NAO,
 - 10+ for employees with >10 years of work experience: sponsored by Global Chief Diversity Officer, focused on developing employees who have tenure of greater than 10 years;
- The Invest In Yourself diversity and inclusion certification program: an 8-part series attended by over 2,200 global learners, achieving gender balance in attendance with 49% women and 51% men participating.
- The Inclusive Leader diversity and inclusion certification program: a 5-part series for leaders based on studies from Deloitte on what competencies leaders should cultivate to become more inclusive.
- Global Accessibility Awareness Day: development and delivery of webinars featuring world-renowned experts in accessibility and disability awareness, streamed live with close captioning across the globe;
- NAO Veterans Appreciation Day: creation and employee distribution of a thank you card for Atos employees who served, or are serving, in the military, providing community connections through The US Marine Corp's Toys For Tots program, and conducting resume development workshops for local veterans groups;
- Women in TechNOWlogy webinar series: quarterly panel discussion of topics affecting/enhancing women's development;
- Volunteer efforts of Atos employees with young women mentoring, career advice or career development advice, in several countries;
- Quarterly A Seat At The Table panel discussions: Global Chief Diversity Officer provides insights and information to Atos women on advancing their careers and getting noticed for accomplishments;
- NAO Diversity Dimensions newsletter: monthly newsletter sent to NAO employees highlighting diversity events and programming;
- Women Who Succeed Tech Talks: monthly webinars hosted by Atos women from the Scientific and Expert communities to and Expert communities to increase awareness of technologies in development/use at Atos;

(See more information in Registration Document D.2.4.3)

Since 2010, Atos launched a global survey in order to measure the "Well Being at Work" initiative and employee's satisfaction. This global survey, managed by the Great Place to Work Institute®, helps Atos determine employee's expectations and focused areas for improvement.

In 2018 the survey was conducted in 94 entities in 66 different countries. In total 89,751 employees were invited to take part in the survey and the final response rate was 66% reflecting the voice of 59,180 employees. Details in the Registration Document (D.2.5.2).

- **Measurement of outcomes**

Description of how the company monitors and evaluates performance.

The Great Place to Work survey's 2018 results show that in average 57% of responses to "Taking everything into account, I would say this is a great place to work" are positive or very positive. The average score communicated by GPTW on the 59 statements improved with 3.7% from 53.6% in 2017 to 57.3% in 2018. This result of the Trust Index score demonstrates the commitment and involvement of employees to share their views and to help building a great working environment together.

In addition, the HR Reporting monitors the follow up of labor KPI, such as working conditions, actions for discrimination, etc. The full set of KPI is indicated in Registration Document D.2.7 (Being a responsible employer - KPI overview).

Please refer to the Corporate Responsibility Report 2018 (People: "Being a Responsible employer").

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, reviewed in 2018, has defined the GRI Standard aspects which are material for us (methodology explained in D.1.3 of the 2018 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).

Long-term targets are in line with the world effort to tackle climate change. The Group's carbon intensity reduction targets for 2021-2050 have officially been approved by the SBTi (Science-Based Targets initiative) as in line with the world effort to limit the rise of climate change below 2°C. In 2019, the SBTi will send out additional recommendations following the last IPCC report publication (SR15 report - October 2018).

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 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; Integrated Report "Environment" (pages 62-67) and "GRI Standards Content Index" table).

The main results of the Atos' environmental program could be reviewed in the Registration Document page 114:

Global energy intensity: at the end of 2018, the Group energy intensity was 222.07 GJ per € million revenue (227.35 in 2017 and 243.41 in 2016);

Data centers energy efficiency: at the end of 2018, the average PUE (Power Usage Effectiveness) was estimated at 1.74 for all Atos IDM datacenters and at 1.62 in 2018 when considering only the strategic datacenters;

Low-carbon energy: in 2018, over 95% (90% in 2017) of the electricity consumed by Atos' IDM strategic datacenters (owned and operated by Atos, co-location excluded) was supplied by decarbonized sources and around 57% from renewable sources;

Global travel intensity: at the end of 2018, the global travel intensity was 4,662 km per year per employee (4,685 km in 2017, 5,614 in 2016 and 6,114 in 2015);

Global Carbon emissions: during the period 2008-2015, Atos achieved 50% in carbon reduction (both in absolute terms and in intensity). Between 2016 and 2018, Atos reduced its carbon intensity by above 15% versus 2016;

Carbon offsetting: Last April 18 of 2019, Atos, announces that it has offset 100% of its 2018 CO2 emissions worldwide, through a dedicated wind farm program. In addition to offsetting emissions from its data centers, which it has done since 2014, Atos now ensures that this program also includes the offsetting of carbon emissions produced by its offices and business travel. This initiative is part of Atos' global environmental program supporting Advance 2021 strategic plan. See new in web page: <https://atos.net/en/2019/press-release-2019-04-18/atos-offsets-100-of-its-carbon-emissions-through-global-wind-farm-program>

Global environmental monitoring and certification: at the end of 2018, a global EMS (Environmental Management System) covers the full Group and around 85% (80% in 2017) of Atos' main sites (data centers and offices) are ISO 14001 certified or have already entered the certification process.

- **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 Report where Atos actions related to Environment are reported (Registration Document D.5. and Integrated Report "Environment", pages 62-67).

- **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 2018, 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 2018 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, in "D.5.4 Supporting transition to a low-carbon economy – KPI overview").

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, reviewed in 2018, has defined the GRI Standard aspects which are material for us (methodology explained in D.1.3 of the 2018 Registration Document). The following GRI Standard aspects are considered as material:

- Economic Performance;
- Market Presence;
- Indirect Economic Impact;
- Procurement Practices;
- Anti-corruption;
- Compliance.

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 2018, 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 2018 Registration Document which reports Atos actions related to Ethics and prevention from corruption; for more information (D.4).

- **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 2018, 92% of employees have been trained to the e-learning on the Code of Ethics.

In addition, to ensure a deeper understanding of the specific risks related to corruption, as part of CSR Ambition 2019, Atos has launched since 2017 the "Fight Against Corruption" training. This training elaborated by the United Nations and available online is composed of 4 introductory messages followed by six modules of five minutes each. It allows a deep understanding of the UN Global Compact's principle against corruption and the UN Convention against Corruption as it applies to the private sector. Thus, the six learning modules cover:

- gifts and hospitality policy, received or given;
- facilitations payments;
- intermediaries and lobbyists;
- social investments;
- insider trading.

The objective is to ensure that all Managers of Atos will be trained by the end of 2019 to this specific e-learning. Such training will also be demanded to targeted people (sales, procurement) in the countries in which a corruption risk is identified through self-assessment by the management and compliance officer or when a risk of non-compliance with internal processes has been pointed out after a country audit.

Atos Code of Ethics establishes the right of all employees to raise an alert in the event of a suspected non-compliance with the values and principles of the Code of Ethics. The Code of Ethics alert system has been established in compliance with the requirements of the French Data Protection Authority. Local General Counsels, management, and Group Compliance are points of contact for any employee raising an alert, ensuring that the rights of employees, and the sender or subject of the alert, are protected accordingly. The Atos

Group alert system, in its new version elaborated in accordance with the Sapin II law, includes breaches regarding the duty of vigilance.

Any allegations of non-compliance detected within the Company are to be reported to the Head of Compliance and/or to the Group Head of Internal Audit, who will launch the Internal Investigations procedure. 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 2018 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.

Atos, as other IT companies, faces high pressure from regulators around the world, and mostly in the US, UK regarding the fight against corruption, especially in high corrupted countries. Atos' compliance program has been strengthened to keep executives and sales forces aware and trained on these specific compliance risks, with the United Nations' Anti-Corruption Training Tool, and to encourage reporting of corrupt practices, through its global and local alert system. Being exposed internationally with evolving regulations, the Company could be materially adversely affected if it fails to maintain the business integrity and ethical behavior. As a participant to the United Nations Convention against Corruption, Atos subscribes to anti-bribery principles in "all its forms, including extortion and bribery".

For 2018, between 50-100 ethical alerts were reported and monitored at the Group Compliance level (Registration Document section D.4.2, page 105)

In 2018, 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 2018 Registration Document for Atos actions related to Ethics and no corruption (Set of KPIs at the end of the D.4: "D.4.5 Ethical & Governance excellence in Atos' sphere of influence – KPI overview").