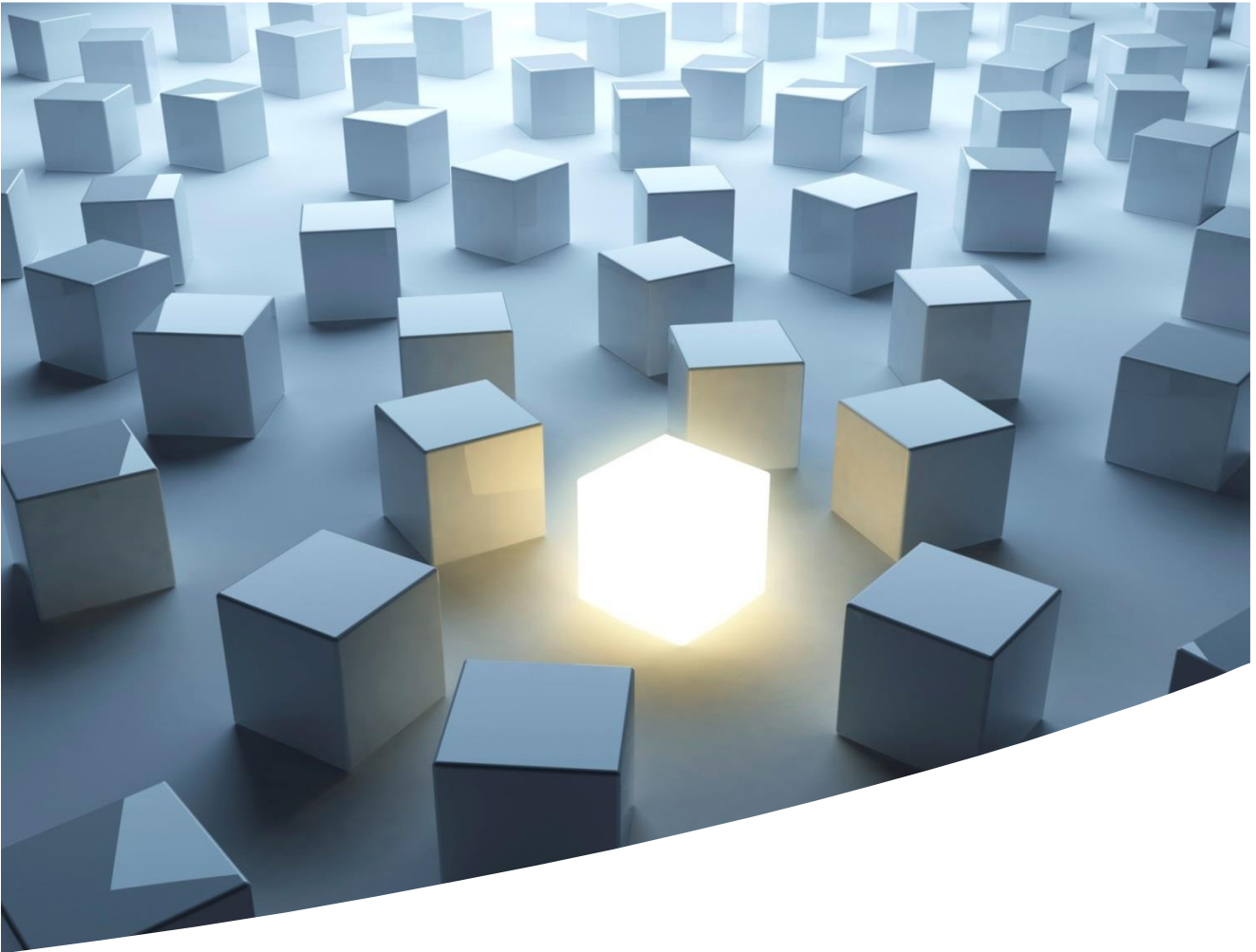




CODE OF ETHICS



Working in the professional sector, ethical conduct in our day to day business activities is the core requirement.

MESSAGE FROM THE CHAIRMAN



Working in the professional sector, ethical conduct in our day to day business activities is the core requirement

Over and above fashion and dominant trends, our role is to guide our customers in their choices and partner them in their major transformation projects, supported by the ethical principles and defining values of our company:

- Customer service is paramount;
- Quality and professional excellence;
- Respect for others;
- Drive for positive and effective action;
- Spirit of the Group.

The Sopra Steria Group Code of Ethics underpins our approach to transparency, fairness and loyalty towards all our stakeholders: customers, employees, shareholders, partners, suppliers and others in the wider society.

Supported by Group management, who ensure its rules are respected, the Code of Ethics applies to all employees to guarantee good conduct in our business activities.

It is in a spirit of excellence that Sopra and Steria were created and developed. It is with this objective in mind that Sopra Steria Group will continue to build relations with all its stakeholders.



Pierre PASQUIER

Chairman

OUR COMMITMENT AS A RESPONSIBLE COMPANY

Our concern for the durability and responsibility of sustainable development constitutes a natural extension of Sopra Steria Group values.

The Group prioritises strong management and respect for values in conducting its economic, environmental and social activities.

The aim of this approach is to reconcile economic performance, social equity and respect for the environment.

To support respect and good management of its business, Sopra Steria Group has set out in this code the main ethical principles that are to guide our day to day actions.

This code is based on compliance with the laws and regulations in force in the countries where the Group operates and with commitments to conduct its business to the best of its ability.

In particular, the aim of the Sopra Steria Group Code of Ethics is to define the principal ethics that contribute to the Group's economic development, as such:

- transparency and fairness with its customers, partners and suppliers, in its relations and working methods;
- Respect for people it employs in terms of working conditions that are considered to be fair and non-discriminatory;
- Respect for the environment, in line with the current national and international standards.



The Group has signed the United Nations Global Compact, Advanced level.

By this commitment, Sopra Steria Group upholds the 10 principles of the Global Compact concerning labour rights, protection of the environment and the fight against corruption. These principles are consistent with the Group values and fundamentals since its creation.

The Sopra Steria Group ethical codes in conducting its business are aligned to its commitment to the Global Compact.





Conducting business

Sopra Steria Group does not tolerate any form of corruption, influence-peddling or embezzlement with a view to obtaining a commercial advantage.

In conducting its business, Sopra Steria Group will comply with the following and ensure its employees also comply:

- legislation related to preventing and fighting any form of corruption and influence-peddling; direct or indirect, active or passive;
- rules related to competitive conduct;
- the confidentiality of information to which each employee has access in the context of his or her engagements and activities within the Group.

Sopra Steria Group is equally committed to avoiding situations where conflicts of personal interest are contrary to the Group's interests.



Fundamental and social rights

Sopra Steria Group complies with the principles and fundamental rights of the Universal Declaration of Human Rights of United Nations and the Charter of Fundamental Rights of the European Union.

Sopra Steria Group will:

- fight against child labour and exploitation, forced labour or any form of compulsory labour;
- comply with national social law and the specified labour agreements of each country where the Group does business;
- comply with the application of trade union rights in each of the countries concerned.

Sopra Steria Group implements a social policy aimed at preserving the health, safety and dignity at work of each of its employees.

In particular, Sopra Steria Group takes particular care to respect principles of equality, diversity and non-discrimination, both when hiring employees and throughout the career progression of its employees.



Respect for the environment

The service and consulting activities developed by Sopra Steria Group have a limited impact on the environment compared with heavy manufacturing activities. However, Sopra Steria Group has integrated improvement of its impact on the environment into the management of its activities.

Sopra Steria Group will therefore:

- comply with the laws and standards in force in the countries where the Group conducts its business;
- Implement actions for continuous improvement;
- monitor these actions over time.

To set out its commitment to the environment in the management of its activities, Sopra Steria Group has defined an environmental policy for its principal areas of operation. The principal areas with a direct impact on the environment; facilities, purchasing, business travel , infrastructure and IT resources .



MONITORING AND APPLICATION OF THE CODE OF ETHICS

The Code of ethics and its commitments are carefully monitored at the highest level. It is steered under the responsibility of the General Management and involves all of the Groups functional and operational departments.

The managers of the Group activities are therefore responsible for compliance with the current applicable regulations and the internal procedures for their respective entities.

An internal communication programme, based on the Sopra Steria Group information mechanism, is, moreover, deployed for all employees and new hires in relation to these internal procedures.

Sopra Steria Group takes regular action to develop the awareness of all its employees and ensure they respect the Group's values and fundamentals and the principles of this code.

Awareness is notably developed at the seminars on integration, professional development and sharing of Group fundamentals organised by the Sopra Steria Academy internal training structure.



DESCRIPTION OF THE SOPRA STERIA ANTI-CORRUPTION AND ANTI-INFLUENCE-PEDDLING POLICY

Definition

Corruption may be defined as the act of giving, offering or receiving an illicit commission, an unjustified consideration or the promise of such a commission or consideration with the aim of influencing the behaviour of an individual in order to gain an unfair advantage (commercial, technological, economic ...), either directly or indirectly.

This definition distinguishes between the notions of:

- active corruption: from the point of view of the individual who grants the unjustified consideration; and
- passive corruption: from the point of view of the individual who acts, or fails to act, in accordance with his/her duty for the purpose of receiving an unjustified consideration.

Influence-peddling is generally defined as the practice of offering someone an unfair advantage to abuse their influence, whether genuine or supposed, in order to obtain special treatment, jobs, contracts or any other favourable decisions from an authority or public service. The law makes a distinction between active and passive influence-peddling.

- Active influence-peddling relates to the conduct of the person who suggests to a third party holding an influence, or accepts an offer from a third party holding an influence, to make use of that influence.
- Passive influence-peddling relates to the conduct of the person who holds influence and offers or agrees to use it.

With regard to the different applicable national legislations once an act of corruption or influence-peddling is proven, the sanctions may take different forms in different countries, including fines, imprisonment, exclusion from the exercise of certain functions, dissolution of the legal entity concerned, fiscal penalties, exclusion from public contracts.

Furthermore, it should be noted that in most countries, especially those within the European Union, acts of corruption and influence-peddling related to the procurement of public contracts also generally constitute violations of the rules of competitive tendering which may lead to criminal penalties.



Practices implemented at Sopra Steria Group

Whilst not forbidding the principle of so-called entertainment and/or hospitality expenses, or of promotional or marketing expenditure aimed at promoting Sopra Steria Group's image, it should be noted that such costs and expenses must be strictly reasonable and moderate.

In all cases, it is strictly forbidden to either offer or receive:

- any form of bribe or under-the-table payment,
- cash payments,
- gifts to or from domestic and/or foreign public officials, especially in the context of a consultation process for the award of a public contract.



Recommendations inside Sopra Steria Group

Each Sopra Steria Group employee is required to exercise his/her professional activities with integrity and complete transparency, using discernment and good sense to ensure that all of his/her actions are based solely on the interests of the company, without prejudice to customers or other business partners.

If it happens that an employee is in a position to give or receive a gift (material object or an invitation), he/she must consider whether giving or accepting this gift would be prejudicial to the interests or the image of Sopra Steria Group.

In the event that the employee concerned is able to respond affirmatively to these questions, it is his/her duty to stop all actions and refer the matter to his/her superiors.

In the case of a negative reply, it should be understood that the only acceptable items are customary acts of courtesy or hospitality, communication actions and promotional events, or gifts of a symbolic or nominal value.

If the employee has any doubts concerning the gift, he/she should inform his/her superiors to obtain their approval, which will be strongly dependent on the actual context in which the gift is made.

Control and alert procedures implemented at Sopra Steria Group

The internal procedures put in place by Sopra Steria Group, in particular the procedures concerning purchasing and the procedures governing external invitations and entertainment expenses, are intended to prevent all forms of prohibited behaviour and are subject to regular review by the internal audit department.

Furthermore, in the event that a Sopra Steria Group employee becomes aware of a case of active or passive corruption or influence-peddling, he/she has a duty to inform his/her superiors and/or senior management.



Sopra Steria and Corporate Responsibility

A signatory of the United Nations Global Compact (Advanced level), Sopra Steria has embraced its ten principles of human rights, labour, the environment and opposing corruption as the basis of Corporate Responsibility. The Group is committed to promoting and pursuing these principles across its sphere of influence.



Sopra Steria at a glance



Sopra Steria, a European leader in digital transformation, provides one of the most comprehensive portfolios of offerings on the market, spanning consulting, systems integration, industry-specific solutions, infrastructure management and business process services. It provides end-to-end solutions to address the core business needs of large companies and organisations, helping them remain competitive and grow. Combining added value with innovative high-performance services, Sopra Steria excels in guiding its clients through their transformation projects to help them make the most of digital technology.

With over 44,000 employees in more than 25 countries, Sopra Steria generated revenue of €4.1 billion in 2018.