

The world is how we shape it

sopra  steria

# Code of ethics

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2023

# Summary

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# Message from the Chairman

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In the performance of our business activities, ethical conduct is the overriding requirement in our everyday actions.

Over and above prevailing trends and fashion, our role is to guide our customers in their choices and support them in leading their major transformation projects by drawing strength from the ethical principles and values that define our Group:

- Openness and curiosity
- Team spirit
- Willingness to act positively
- Customer focus
- Professional excellence
- Respect for others



Sopra Steria Code of ethics enshrines our determination to build transparent, fair and loyal relationships with all our stakeholders, whether customers, employees, shareholders, partners, suppliers or civil society.

The Code of ethics is supported by the Group's management team, who enforce its rules, and applies to all employees to guarantee good conduct in our activities.

Sopra Steria's creation and development have been shaped by a culture of excellence. The Group will continue forging relations with all its stakeholders with this objective in mind.

**Pierre Pasquier**, Chairman and Founder of the group Sopra Steria

# 1. Our commitment as a responsible company

Our concern for the durability and responsibility of sustainable development represents a natural extension of Sopra Steria's values.

Exacting management standards and respect for these values serve as the Group's guiding light when performing its economic, social and environmental activities.

This approach aims to reconcile economic performance with social equity and respect for the environment.

To ensure respect and effective management of its business, Sopra Steria has set out the key ethical principles in this code that guide its day-to-day actions.

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

The Code of ethics is especially intended to define the ethical principles that contribute towards the Group's economic development through:

- Transparent and fair working practices and relations with its customers, partners and suppliers;
- Respect for its employees with fair, decent and non-discriminatory working conditions;
- Respect for the environment in line with applicable national and international standards.

## **WE SUPPORT**



The Group is a signatory of the United Nations Global Compact.

Through this commitment, Sopra Steria upholds the 10 Principles of the UN Global Compact covering human rights, international labour standards, environmental protection and the fight against corruption.

These principles resonate with the values and fundamental principles that have defined the Group since its creation.

## **1.1. Business conduct**

Sopra Steria does not tolerate any form of corruption or influence peddling with a view to obtaining an undue commercial advantage.

When conducting its business, Sopra Steria agrees to uphold and bind its employees with:

- Legislation aimed at preventing and fighting all forms of corruption or influence peddling, whether direct, indirect, active or passive;
- Rules governing competition;
- The confidentiality of the information to which all employees have access in the course of their duties and activities within the Group.

Sopra Steria is also committed to preventing and managing potential conflicts of interest.

## **1.2. Fundamental and social rights**

Sopra Steria adheres to the fundamental principles and rights set out in the United Nations Universal Declaration of Human Rights and the Charter of Fundamental Rights of the European Union.

Sopra Steria is committed to:

- Tackling child labour and exploitation, forced labour and all other forms of compulsory labour;
- Complying with labour legislation, relevant international standards and regulations on occupational health and safety, and collective bargaining agreements in each country where the Group operates;
- Creating a caring environment and combatting any form of sexual or psychological harassment or offensive conduct, whether verbal or physical, which could create an intimidating, offensive or hostile situation within the work environment. Any situation or behaviour that could be classed as harassment will be treated with the utmost seriousness and in accordance with applicable national provisions;
- Upholding trade union rights in each country concerned.

Sopra Steria takes particular care to ensure compliance with the principles of equality, diversity and non-discrimination in both its recruitment practices and its employees' professional development.

Sopra Steria pursues a human resources policy aimed at protecting health, safety and dignity in the workplace for each employee. An occupational risk assessment system has been implemented to identify and prevent risks and roll out action plans in alignment with the regulations in the countries where the Group operates.

### **1.3. Respect for the environnement**

Sopra Steria has incorporated measures into the management of its activities to minimise its environmental impact.

Therefore, Sopra Steria is committed to:

- Complying with the applicable laws and standards in the countries where the Group conducts its business;
- Implementing actions to ensure continuous improvement;
- Monitoring those actions over time.

To set out its commitment to the environment in the management of its activities, Sopra Steria has defined an environmental policy for its main areas of operation.

The principal areas with a direct impact on the environment include facilities, purchasing, business travel, IT resources and infrastructures.

## 2. Oversight and application of the Code of Ethics

The Code of ethics and its commitments are closely monitored at the highest level. It is overseen by General management and involves all the Group's functional and operational departments.

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

An internal communication programme based on Sopra Steria's information system has also been deployed to familiarise all employees and new hires with these internal rules and procedures.

Sopra Steria regularly raises awareness among all its employees to ensure that they uphold the Group's values and fundamentals, and the principles of this code.

Awareness is developed during seminars organised by the Sopra Steria Academy, the Group's in-house training centre, for onboarding new hires, promoting professional development and sharing the Group's fundamentals.

### 3. Whistleblowing procedure and system

In accordance with the Group's values and ethical principles, Sopra Steria has set up a whistleblowing system available to all internal and external stakeholders at the following address: [ethics@soprasteria.com](mailto:ethics@soprasteria.com).

This whistleblowing system can be used to report situations that are potentially in conflict with this code, including corruption and influence-peddling, fraud, insider trading, competition law infringements and violations of human rights and fundamental freedoms, health and safety, and the environment.

The Group guarantees the security, integrity and confidentiality of the whistleblower's data and identity. Whistleblowers must act in good faith without any direct financial compensation. Whistleblowers are protected against any form of retaliation, discrimination, or disciplinary action in relation to their report. This protection extends to any person related to the whistleblower and/or report.

## 4. Anticorruption and anti-influence peddling policy

### 4.1. Definition

Corruption may be defined as the act of giving, offering or receiving illegal commission or unjustified consideration, or promising such commission or consideration, with the aim of influencing an individual's behaviour to obtain an undue advantage (commercial, technological, economic, etc.), either directly or indirectly.

A distinction is made as follows:

- Active corruption: when the initiative is taken by the individual granting the unjustified consideration;
- Passive corruption: when the initiative is taken by the individual who carries out or refrains from carrying out an act in the exercise of their official duties for the purpose of receiving the unjustified consideration.

Influence peddling is generally defined as the practice of offering someone an undue advantage to abuse their actual or supposed influence for the purpose of obtaining special treatment, employment, contracts or any other favourable decision 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.

In pursuance of the different applicable national legislations, once an act of corruption has been established, the sanctions may take different forms according to the country, including fines, prison sentences, exclusion from exercising certain functions, dissolution of the legal entity concerned, fiscal penalties, and exclusion from public contracts.

Furthermore, in most countries and especially the EU Member States, acts of corruption and influence peddling aimed at securing public contracts also constitute violations of the rules on competitive tendering, which may lead to criminal penalties.

## 4.2. Practices implemented at Sopra Steria

All Sopra Steria employees must perform their professional activities with complete integrity and transparency using their discernment and common sense to ensure that all their actions are based solely on the company's interests and do not harm customers or other business partners.

The code of conduct for preventing corruption and influence peddling, which complements this code, sets out the behaviour to be adopted by all our employees and with our stakeholders. It is illustrated with real-life examples and published in 10 languages, thereby covering all the Group's entities.

While not banning the principle of gifts and invitations aimed at promoting the Group's image and/or complying with traditional hospitality rules, such gifts and invitations must be strictly reasonable and moderate. They must not influence the decision or affect independence in the execution or evaluation of the service performed, whether as the provider or customer. Gifts and invitations, whether offered or received, must comply with the following principles:

- Be of a reasonable or modest amount;
- Comply fully with the rules of the Group;
- Be directly associated with promoting the company's products or services and/or for professional purposes;
- Be completely transparent with respect to the company;
- Not be in cash or cash equivalents (vouchers or exceptional discounts);
- Never aim to make the recipient accountable, particularly during critical decisions, invitations to tender or contract award negotiations.

Whenever employees are in a position to give or receive a gift (material object or invitation), they must consider whether giving or accepting the gift would undermine Sopra Steria's interests or image.

If the employees concerned can respond affirmatively to these questions, it is their duty to stop all actions and refer the matter to their superiors.

Otherwise, only customary acts of courtesy or hospitality, communication actions and promotional events, or gifts of a symbolic or minimal value are likely to be acceptable.

If employees have any doubts about the gift, they must inform their manager to obtain approval, which will depend on the actual context in which the gift is made.

### **4.3. Control procedures**

The internal procedures implemented by Sopra Steria, particularly the procedures governing purchasing, external invitations and entertainment expenses, are intended to prevent any behaviour contrary to this code and are regularly reviewed by the Group's Internal Audit Department.

## **Sopra Steria Group**

Head office

6 avenue Kleber

FR 75116 Paris

Phone : +33(0)1 40 67 29 29

Fax : +33(0)1 40 67 29 30

[contact-corp@soprasteria.com](mailto:contact-corp@soprasteria.com)

[www.soprasteria.com](http://www.soprasteria.com)