



Statement of Principles

to respect human rights and the environment

December 2023

The world is how we shape it

sopra  steria

Table of Contents

1. The world is how we shape it	03
2. Our commitment to respecting human rights and the environment	04
3. Relevant human rights and environmental issues	05
4. Our approach to implementing our human rights and environmental due diligence obligations	08
5. Governance and monitoring	10
6. Scope of application	11
7. Final provision	12



1. The world is how we shape it

Our guiding principle "The world is how we shape it" stands for our conviction that respect for human rights and the environment is a central element of our corporate responsibility and for our commitment to respecting these along our value chains.

"In order to tackle the immense challenges of societal and environmental transformation we work with all our stakeholders. Our employees are the source of our strength and our ability to get things done. Our clients are the reason we innovate and embrace change. With our partners, we develop tech-driven solutions to create a more sustainable world. We take our suppliers with us on our journey, and our shareholders are firmly behind our corporate project."

Cyril Malargé, CEO of Sopra Steria Group SA

Together, we are giving digitalization a social benefit.

By signing this declaration, we are once again formally expressing our commitment to respecting and upholding human rights and to fair, sustainable, and environmentally friendly business practices. This applies in particular with regard to our value and supply chains.

This declaration will be updated on an ongoing basis.



2. Our Commitment to Respecting Human Rights and the Environment

In particular, we base our business activities on the following guiding principles and laws:

- The United Nations Universal Declaration of Human Rights
- The UN Guiding Principles on Business and Human Rights
- The ten principles of the UN Global Compact (the Compact Advanced reporting category reflect the ethical principles that are based on the principles and fundamental rights of the UN Universal Declaration of Human Rights and the Charter of Fundamental Rights of the European Union)
- The European Convention for the Protection of Human Rights and Fundamental Freedoms
- The requirements of the German Supply Chain Due Diligence Act
- The core labor standards of the International Labour Organization (ILO) with its five fundamental principles
- The Diversity Charter
- The United Nations Sustainable Development Goals (SDGs)

Our Declaration of Principles is based on our internal Code of Conduct. This Code provides the ethical and behavioral framework for our business decisions, daily operations, and culture. It is binding for all Sopra Steria employees. This Code of Conduct is based on the standards of the Sopra Steria Group Code of Ethics, our own internal guidelines, the quality/environmental principles and objectives, the expectations of our stakeholders, and the legal requirements for our business.

ESG compliance and the identification of sustainability risks are important to us and form part of our due diligence obligations under the Supply Chain Due Diligence Act. This also applies to our value chain.

We work with our partner EcoVadis to assess the sustainability practices of our supply chains in the areas of the environment, labor and human rights, ethics, and sustainable procurement. In addition, our suppliers undertake to comply with our Code of Conduct for Suppliers.



3. Relevant Human Rights and Environmental Issues

We recognize that our operations and our supply and value chains present potential risks for human rights abuses. We are therefore committed to respecting and upholding internationally recognized human rights in our operations and along our value chains. For us, this includes the following issues, in particular:

Diversity and Equality

We value diversity and strive to embrace it. We work continuously to create a non-discriminatory working environment in which each of our employees can develop and thrive - regardless of age, gender, origin, physical or mental ability, sexual orientation, or religion. Responsibility for Diversity & Inclusion is embedded in our organization through the role of the Diversity Manager.

Reasonable Remuneration

We guarantee market-compliant remuneration, which is reviewed annually. Our constant aim is to respect the principle of equal pay for equal work. Transparent communication on the development and composition of remuneration is a matter of course for us. We comply with the statutory minimum wage requirements in each individual case.

Occupational Health and Safety and Working Conditions

We provide a physically and mentally safe working environment for our employees. We comply with the applicable occupational health and safety laws and local health and safety standards. Our occupational health and safety team is available at all times and provides regular training on the subject. In addition, we are supported by an external occupational health and safety specialist and regularly provide specific training and personal health programs. Where necessary, we prefer to compensate for overtime in the form of time off or remuneration. Our working hours are in line with legal requirements.

We do not tolerate any form of forced labor at our company or in the companies in our supply chain. We will investigate any violations that come to our attention and reserve the right to terminate our contractual relationships.

Children's Rights

The same applies to children's rights to development and education and the associated prohibition of child labor. We therefore base our actions on the standards defined and set out in the ILO core labor standards.

Trade Union Rights

We support the right of our employees to form coalitions or associations and to engage in collective action. For example, our works council regularly conducts collective bargaining on working conditions.



Data Protection and Privacy

The protection of personal data and the privacy of our employees are irrevocable personal rights for us. This also applies to our customers, partners, and companies in our supply chain.

We operate a process- and risk-oriented data protection management system to ensure continuous compliance with relevant EU data protection regulations, national laws, and the relevant requirements of customers and data subjects. All our actions are based on compliance with the requirements of the General Data Protection Regulation (GDPR) and the data protection guidelines we have developed and published internally.

Protection of the Environment

We believe that human rights and environmental rights are inextricably linked. Therefore, environmental protection must be given particular importance.

Over the past decade, our environmental program has focused on reducing emissions, promoting the circular economy, supporting biodiversity, and collaborating with stakeholders. Environmental best practice is integrated into our operations, services provided to customers, and supply chain. We strongly condemn any form of negative impact and destruction of the environment by individuals or companies.

All of our initiatives, actions, targets, and results are reported annually in the Corporate Responsibility Report and verified by an auditor.



Potentially Affected Groups of People

In our efforts to respect human rights, we focus on the following groups of people whose human rights may be at risk along our supply and value chains. These include:

- Our own employees, including trainees, temporary workers, interns, and working students;
- Employees of business partners
- Employees of service providers and direct suppliers
- Groups of people in our downstream value chain
- Members of the local communities and residents in the physical vicinity of our offices
- Family members, etc.

Within these groups of people, we see groups of people at increased risk of becoming victims of human rights abuses. They may have special needs, may be socially excluded, or may find it difficult to make their voices heard.

These include women, the elderly, sick and disabled people, children and people with limited access to education, minorities (religious, linguistic, ethnic, national), LGBTIQ* people, whistle-blowers, and people with functions in the works council.



4. Our Approach to Implementing our Human Rights and Environmental Due Diligence Obligations

We will continually review and develop our due diligence processes in response to changing conditions and our business activities. We are guided primarily by the requirements of the German Supply Chain Due Diligence Act and the related UN Guiding Principles on the Environment and Human Rights. The specific preventive and remedial measures depend on the systematic or selective risks identified.

Risk Analysis

Based on our established risk assessment processes, we systematically identify all relevant human rights and environmental issues in our own business environment and in our direct business relationships in the supply chain when purchasing services and products.

Our standardized risk analysis has a direct impact on supplier selection and business decision-making processes. This is conducted annually and on an ad hoc basis, for example when there is a significant change in a supplier's profile or business activities.

Preventive Measures

Where necessary, the results are immediately incorporated into the adaptation of our preventive measures, internal processes, training content, and guidelines in order to meet and continuously strengthen our corporate duty of care.

We expect our suppliers to follow our Supplier Code of Conduct.

In addition, external auditors regularly confirm the compliance of our internal processes. This includes, for example, certification to ISO 9001 (quality management), ISO27001 (information security management), and ISO 14001 (environmental management).

Remediation

If we have reasonable grounds to suspect that our business activities are causing or contributing to human rights or environmental abuses, we will investigate the matter and - if the suspicion is confirmed - take appropriate action to remedy the situation. This is even more important if the violation has already occurred or is about to occur.

Remedial action is not limited to our own business activities. We also investigate violations - or suspected violations - in the supply and value chains with the same diligence and consistency. We require and expect our business partners to cooperate and expect them to cooperate fully in investigating and remediating possible human rights and environmental abuses. Depending on the severity of the case, we may contractually reserve the right to take legal action. This also applies if appropriate remedial action has not been taken within a mutually agreed period of time. If no milder means are effective, we reserve the right to terminate the business relationship as a last resort.

Complaints Procedure

In order to effectively detect and remedy breaches of the due diligence obligations described above, and to effectively investigate any suspicion of a breach, we have established the following complaint procedures.

Via the e-mail address

SopraSteria-Whistleblower@skwschwarz.de

and by telephone on +49 (0)89 286 40-444

Our employees, business partners, or suppliers can report actual or suspected violations (including in anonymous form). Reports made via this reporting office are processed by independent persons who are obliged to maintain confidentiality. No person has to fear any disadvantages from Sopra Steria due to the reporting of or indication of violations.

Monitoring Effectiveness

We regularly review the effectiveness of the measures described in this Statement of Principles on an annual and ad hoc basis. In this way, we ensure that any adverse effects are identified, remedied, and reduced or avoided in the future. Within our company, the review is based on defined key figures, such as the number of identified compliance violations, training results, and the results of employee surveys. In our value chain, we verify the effectiveness of our measures by evaluating supplier profiles, evidence, and certificates and, where appropriate, supplier audits.

Reporting/Documentation

In accordance with Section 10 (2) LkSG, we inform the authorities and the public in an annual report of all human rights and environmental risks identified during the reporting period. The report, which is published on our website, focuses on the effectiveness of the processes implemented to meet our corporate due diligence obligations along the supply chain and the implementation of preventive and remedial measures.



5. Governance and Monitoring

Overall responsibility for this Declaration lies with the Board of Directors of Sopra Steria SE. Operational responsibility for the design, management, and implementation is anchored in the Legal & Compliance department.

In cooperation with the internal departments Area Risk Management, Governance, and Internal Controls, as well as those responsible for other functions such as Human Resources, Purchasing, Corporate Responsibility, Environmental Protection, Occupational Health and Safety, and our Diversity Manager, as well as the employer and employee representatives, appropriate improvement measures are discussed, defined, implemented, documented, and communicated in relation to the established process.

Adequate oversight of the entire process is provided by the Compliance function as part of its regular monitoring role, and by the Procurement and Internal Controls functions as part of their regular effectiveness reviews.

A person's hands are shown typing on a laptop keyboard. Overlaid on the image are several semi-transparent icons: a magnifying glass, a set of scales of justice, a classical building facade, a document with a pencil, and a gavel. The background is a blurred office setting.

6. Scope of Application

This Declaration applies to Sopra Steria SE (also referred to as "Sopra Steria" or "we" in this document) and its subsidiaries - Sopra Steria GmbH, Vienna, ISS Software GmbH, Hamburg, Sopra Steria Services GmbH, Hamburg and it-economics GmbH, Munich - including all its managers and employees.

7. Final Provision

The Declaration of Principles on Respect for Human Rights and the Environment takes effect on the date of signature and supplements previous standards and guidelines on the subject. No rights of third parties can be derived from the Declaration of Principles. It was approved and signed by the Board of Directors of Sopra Steria SE on December 5, 2023.

Sopra Steria SE
Hans-Henny-Jahnn-Weg 29
22085 Hamburg
Germany
T. +49 (0)40 22703-0
E. info.de@soprasteria.com