

POLICY STATEMENT

POLICY STATEMENT ON RESPECT FOR HUMAN RIGHTS AND THE ENVIRONMENT

February 2026

The world is how we shape it.

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1. "THE WORLD IS HOW WE SHAPE IT"	3
<hr/>	
2. OUR COMMITMENT TO RESPECTING HUMAN RIGHTS AND THE ENVIRONMENT	4
<hr/>	
3. RELEVANT HUMAN RIGHTS AND ENVIRONMENTAL ISSUES	5
3.1. Diversity and equal opportunity	5
3.2. Reasonable compensation	5
3.3. Health and safety at work and working conditions	6
3.4. Children's rights	6
3.5. Use of private or public security forces	6
3.6. Coalition rights	6
3.7. Data protection rights and privacy	7
3.8. Environmental protection	7
3.9. Potentially affected groups of people	7
<hr/>	
4. OUR APPROACH TO IMPLEMENTING HUMAN RIGHTS AND ENVIRONMENTAL DUE DILIGENCE	8
4.1. Risk analysis	8
4.2. Preventive measures	8
4.3. Remedies	9
4.4. Complaints	9
4.5. Effectiveness monitoring	9
4.6. Reporting/documentation	9
<hr/>	
5. GOVERNANCE AND MONITORING	10
<hr/>	
6. SCOPE OF APPLICATION	11
<hr/>	
7. FINAL PROVISION	11

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 uphold these values throughout our value chains.

“We work together with all our stakeholders in order to overcome the immense challenges posed by social and environmental change. Our employees are the source of our strength and our ability to achieve. Our customers are the reason we innovate and embrace change. Together with our partners, we develop technology-driven solutions for a more sustainable world. We take our suppliers with us on our journey, and our shareholders stand firmly behind our corporate project.”

FREDERIC MUNCH, CEO SOPRA STERIA GERMANY & AUSTRIA

Together, digitalization becomes 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 to our value and supply chains.

This statement is continuously updated.





2. OUR COMMITMENT TO RESPECTING HUMAN RIGHTS AND THE ENVIRONMENT

Our business activities are based on the following guiding principles and laws in particular:

- 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 reflects the ethical principles that are based on the principles and fundamental requirements of the United Nations 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)
- OECD Guidelines for Multinational Enterprises

Our policy statement is based on our internal Code of Conduct. This code provides the ethical and behavioral framework for our business decisions, our daily work processes, and our corporate culture. It is binding for all Sopra Steria employees. This Code of Conduct is based on the standards of the Sopra Steria Group's code of ethics, our own internal guidelines, our quality/environmental principles and aims, the expectations of our stakeholders, and the statutory requirements applicable to our business.

ESG compliance and the identification of sustainability risks are of great importance to us and form part of our due diligence obligations under the German Supply Chain Due Diligence Act, with which we identify in particular. This also applies to our value chain.

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

3. RELEVANT HUMAN RIGHTS AND ENVIRONMENTAL ISSUES

We recognize that our business activities and our supply and value chains pose potential risks with regard to human rights violations. We are therefore committed to respecting internationally recognized human rights and to observing them in our business activities and throughout our value chains. For us, this includes the following topics in particular:

3.1. DIVERSITY AND EQUAL OPPORTUNITY

We value diversity and strive to put it into practice. We constantly aim to create a non-discriminatory working environment in which each of our employees is able to flourish and develop – regardless of age, gender, origin, physical and mental abilities, sexual orientation, or religion. We are committed to an ethical recruitment process based on transparency, fairness, and equal opportunities. Discrimination in selection procedures is strictly prohibited. Our recruitment practices are based on international standards and promote diversity within our company.

Responsibility for diversity and inclusion in our organization is reflected in the role of the Diversity, Equity & Inclusion Manager.

3.2. REASONABLE COMPENSATION

We guarantee remuneration in line with market conditions, which is reviewed on an annual basis. Our constant aim is to adhere to the principle of equal pay for equal work. For us, transparent communication with regard to the development and composition of remuneration is a matter of course. We meet the requirements of the statutory minimum wage in every single case.



3.3. HEALTH AND SAFETY AT WORK AND WORKING CONDITIONS

We ensure a physically and psychologically safe working environment for our employees. We comply with applicable occupational health and safety laws and local health and safety standards. Our occupational health and safety team is always available and provides regular training on the subject. In addition, we are provided with support by an external occupational safety specialist, and we offer specific training measures and programs aimed at maintaining personal health on a regular basis. Where necessary, we prefer to compensate overtime with time off or additional pay. Our working time regulations reflect the respective statutory regulations.

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



3.4. 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 laid down in the ILO's core labor standards.

3.5. USE OF PRIVATE OR PUBLIC SECURITY SERVICES

When private or public security services are deployed, we ensure that their activities are in line with internationally recognized human rights. We expect our service providers to train their security services accordingly and obligate them to treat employees, residents, and other affected groups with respect. Any form of violence, intimidation, or abuse will not be tolerated. Violations may result in termination of the business relationship.

3.6. COALITION RIGHTS

We support our employees' right to form a bargaining unit or association and endorse collective bargaining and wage negotiations. For example, our works council conducts collective bargaining on working conditions on a regular basis.

3.7. DATA PROTECTION RIGHTS AND PRIVACY

The protection of personal data and the privacy of our employees are inviolable personal rights for us. This also applies to our customers, partners, and companies in our supply chains. In order to ensure constant compliance with EU regulations, national laws, and the relevant requirements of clients and data subjects, we operate a process- and risk-oriented data protection management system. All our actions are based on compliance with the provisions of the EU General Data Protection Regulation (GDPR) and the data protection policy that we have developed and published internally.

3.8. ENVIRONMENTAL PROTECTION

We firmly believe that human rights and environmental rights are inseparably linked. Protecting the environment is therefore an integral part of our corporate responsibility. Sopra Steria pursues a long-term environmental strategy based on internationally recognized standards such as ISO 14001, the United Nations Sustainable Development Goals (SDGs), and the science-based climate targets of the Science Based Targets initiative (SBTi). Our goal is to achieve net-zero emissions by the year 2040.

Our environmental measures focus on reducing greenhouse gas emissions along the entire value chain (Scope 1, 2, and 3), promoting the circular economy, protecting biodiversity, and designing our digital services in a sustainable manner. This includes reducing energy consumption by 20% by 2030 and reducing mobility-related emissions by 90% by 2040. We are committed to sustainable mobility, responsible procurement, and training our employees on climate protection issues.

Best practices with regard to environmental issues are systematically integrated into our business activities, the services we provide to customers, and our supply chain. We strongly condemn any form of negative impact on, or destruction of, the environment by individuals or companies. All of our initiatives, measures, aims, and results are presented annually in our Corporate Responsibility Report and reviewed by an auditor.

3.9. POTENTIALLY AFFECTED GROUPS OF PEOPLE

In our efforts to promote respect for human rights, we focus on the following groups of people, as their 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
- the employees of our business partners
- the employees of service providers and direct suppliers
- groups of people in our downstream value chain
- members of local communities and residents in the physical vicinity of our business locations
- family members, etc.

Within these groups, we see groups of people who are at increased risk of becoming victims of human rights violations. They may have special needs, be potentially socially excluded, or find it difficult to make their voices heard. These include women, the elderly, the sick and people with disabilities, children and people with limited access to education, minorities (religious, linguistic, ethnic, national), people who belong to the LGBTIQ* community, whistleblowers, and people with functions in the works council.



4. OUR APPROACH TO IMPLEMENTING HUMAN RIGHTS AND ENVIRONMENTAL DUE DILIGENCE

Depending on changing conditions and our business activities, we will continuously review and further develop our due diligence processes. In doing so, we are primarily guided by the requirements of the German Supply Chain Due Diligence Act and, accordingly, the UN Guiding Principles on Business and Human Rights. The specific prevention and remedial measures depend on systematically or selectively identified risks.

4.1. RISK ANALYSIS

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

Our standardized risk analysis has a direct impact on supplier selection and corporate decision-making processes. It is carried out annually and on an ad hoc basis, for example in the event of significant changes to a supplier's profile or business activities.

4.2. PREVENTIVE MEASURES

Where necessary, findings are immediately incorporated when it comes to adjustment of our preventive measures, internal processes, training content, and guidelines, in order to fulfill our corporate due diligence obligations and continuously strengthen them.

These clear expectations that we place on our suppliers are defined in our Code of Conduct for Suppliers. This code forms the basis of all our supplier relationships.

Moreover, external auditors confirm the conformity of our internal processes on a regular basis. These include, for example, certifications in accordance with ISO 9001 (quality management), ISO 27001 (information security management), ISO 14001 (environmental management), and ISO 22301 (business continuity management).

4.3. REMEDIES

If there is reasonable suspicion that our business activities are causing or contributing to human rights or environmental violations, then we shall investigate the matter and, if the suspicion is confirmed, take appropriate measures to remedy the situation. This applies all the more if a violation has already occurred or is imminent.

These remedial measures do not only apply to our own business activities. We also investigate violations in value and supply chains – or suspected violations – with the same care and consistency. We oblige our business partners to assist us and expect them to cooperate fully in investigating and ending possible human rights violations or environmental violations. We reserve the right to take legal action, depending on the severity of the case. This also applies if implementation of appropriate remedial measures is not successful even after the elapse of a mutually agreed deadline for remedial action. If no milder measures are effective, then we reserve the right to terminate the business relationship as a last resort.

4.4. COMPLAINTS

In order to effectively detect and remedy violations of the aforementioned duties of care and to effectively investigate any corresponding suspicion of a violation, we have created the following possibilities for filing complaints.

Our employees, business partners, and suppliers can report actual or suspected violations (including anonymously) via email to SopraSteria-Whistleblower@skwschwarz.de or by phone at +49 (0)89 28640-444. Reports made through this reporting office are handled by independent individuals who are bound to confidentiality. No one need fear any negative consequences from Sopra Steria for reporting or providing information about violations.

4.5. EFFECTIVENESS MONITORING

We review the effectiveness of the measures described in this policy statement on a regular basis once a year and as required. This ensures that any adverse effects are identified, remedied, and reduced or avoided in the future. The review within our company is based on defined key performance indicators, such as the number of compliance violations identified, training results, and the results of employee surveys. In our value chain, we review the effectiveness of the measures by evaluating supplier profiles, evidence, and certificates, as well as supplier audits where applicable.

4.6. REPORTING/DOCUMENTATION

As part of our legal obligations under Section 10 Paragraph 2 of the German Act on Corporate Due Diligence in Supply Chains [LkSG], we report annually on identified human rights and environmental risks and on the measures taken to prevent or mitigate them. This reporting is included in the Sustainability Report, which is part of our Universal Registration Document and is published on our website. The report is based on a double materiality analysis that identifies strategically relevant risks along our entire value chain, including CO₂ emissions, resource use, digital sovereignty, equality, and working conditions. The measures and objectives derived from this analysis represent an integral part of our sustainability strategy and are regularly verified by external auditors.

5. GOVERNANCE AND MONITORING

Overall responsibility for this statement lies with management at Sopra Steria SE. Operational responsibility for its design, management, and implementation lies with the Legal & Compliance department.

In cooperation with the Human Resources, Purchasing, Corporate Responsibility, Environmental Protection, Occupational Safety, Quality and Risk Management departments, our Diversity Management team, and employer and employee representatives, appropriate improvement measures with regard to the established procedure are discussed, defined, implemented, documented, and communicated.

Appropriate control of the entire process is ensured, on the one hand, by the Compliance function as part of its regular monitoring tasks and, on the other hand, by the Procurement and Internal Controls functions as part of their regular effectiveness checks.



Wir sind stolz darauf, ein vielfältiges Team zu erhalten, stetig an Vielfalt zu gewinnen und zu sein, was auch unsere Mitarbeiterinnen und Mitarbeiterinnen in Bezug auf Alter, Geschlecht, Herkunft, körperlichen und geistigen Fähigkeiten, Religion, sexuelle Orientierung und Identität, Familien- und Chancengleichheit basiert. Diskriminierung aufgrund von Geschlechtsergebnissen. Unsere Rekrutierungspraktiken orientieren sich an den besten Talenten und fördern die Vielfalt in unserem Unternehmen.

Die Verantwortung für Diversity & Inclusion ist bei uns durch die Rolle der Diversity Manager strukturell verankert.

6. SCOPE OF APPLICATION

This statement applies to Sopra Steria SE (also referred to in this document as "Sopra Steria" or "we") and its subsidiaries – Sopra Steria GmbH, Vienna; ISS Software GmbH, Hamburg; Sopra Steria Services GmbH, Hamburg; Sopra Steria Custom Software Solutions GmbH, Munich; and Sopra Steria Bulgaria, Sofia – including all of their executives and employees.

7. FINAL PROVISION

The policy statement on respect for human rights and the environment shall enter into force on the date of its signing and supplements the aforementioned standards and guidelines on this subject area. No third-party claims may be derived from the policy statement. It was adopted and signed by the Executive Board of Sopra Steria SE on December 5, 2023.

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