Sopra Steria committed to a more sustainable, responsible world

CORPORATE RESPONSIBILITY REPORT

EXTRACT FROM UNIVERSAL REGISTRATION DOCUMENT - 2019

The world is how we shape it*

sopra steria

Message from the Chairman

As I write this message, Europe and the rest of the world are facing a public health emergency. This crisis has already had a significant impact on the economy of the countries where Sopra Steria does business. However, it is too early to predict the precise consequences on our activity.

This situation should not prevent us from presenting a full and accurate report on our Group's performance in 2019.

Last year we achieved our operational and financial targets, a number of commercial successes and some significant milestones for our corporate project.

Two strategic operations have strengthened the Group's capacity in the banking vertical market. The acquisition of SAB in France has helped Sopra Banking Software reach critical mass in its market and the creation of the Sopra Financial Technology joint venture in Germany has opened up promising new opportunities for digital platforms.

2019 also saw major steps forward in terms of corporate responsibility. Sopra Steria firmly believes that digital technology represents a source of progress when it is delivered in a human-centric way; that is what drove our Group to become a signatory of the United Nations Global Compact back in 2004. In January 2020, CDP announced that Sopra Steria had been named for the third consecutive year as one of the 180 most transparent companies that

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"The Group's aims to make a sustainable, human, and guiding contribution to society."

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are the most active in the world in the fight against climate change.

The Group's strategy draws on an independent project that creates sustainable value based on winning new market opportunities, added

value and differentiation, particularly through our significant software development business.

More than ever, our ambition is to be, throughout Europe, the preferred partner for major public administrations, financial and industrial operators and strategic businesses, driving the digital transformation of their activities and information systems, and preserving their digital sovereignty.

This ambition goes hand in hand with ambitious financial performance objectives, particularly with regard to our operating margin percentage.

But in the very short term, we will need to mobilise all our resources to deal with the unprecedented situation we are currently facing.

Sopra Steria faces this period of uncertainty with robust fundamentals and a healthy financial position.
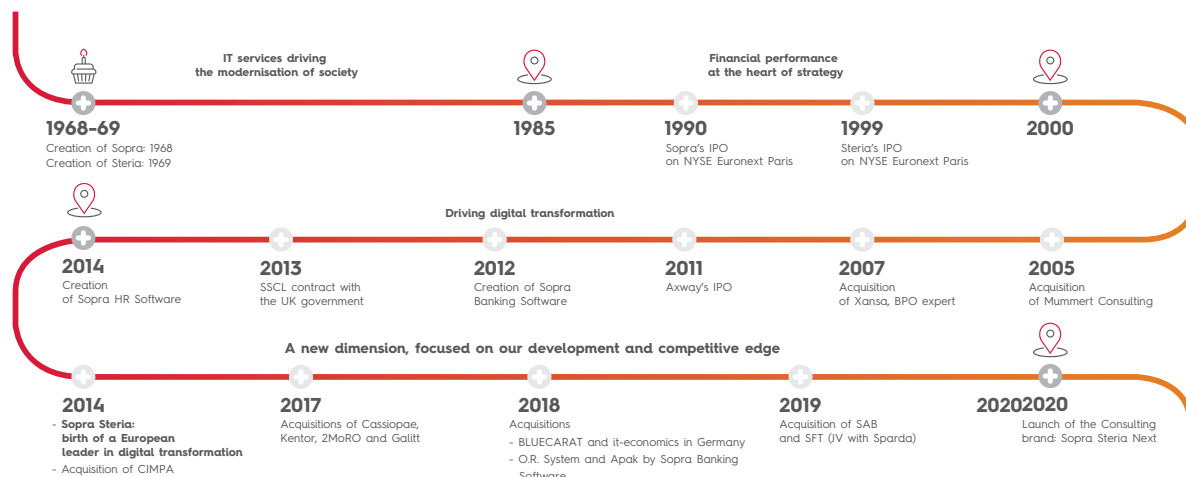
Thanks to the close relationships we have with our clients, and with the whole of our ecosystem, we are confident in the Group's capacity to overcome this crisis.

Pierre Pasquier
Chairman and Founder of Sopra Steria Group

History and corporate plan

More than 50 years of continuous growth and transformation

IT services driving the modernisation of society

Financial performance at the heart of strategy

1968–69
Creation of Sopra: 1968
Creation of Steria: 1969

1985

1990
Sopra's IPO
on NYSE Euronext Paris

1999
Steria's IPO
on NYSE Euronext Paris

2000

Driving digital transformation

2014
Creation
of Sopra HR Software

2013
SSCL contract with
the UK government

2012
Creation of Sopra
Banking Software

2011
Axway's IPO

2007
Acquisition
of Xansa, BPO expert

2005
Acquisition
of Mummert Consulting

A new dimension, focused on our development and competitive edge

2014
- **Sopra Steria:
birth of a European
leader in digital transformation**
- Acquisition of CIMPA

2017
Acquisitions of Cassiopae,
Kentor, 2MoRO and Galitt

2018
Acquisitions
- BLUECARAT and it-economics in Germany
- O.R. System and Apak by Sopra Banking
Software

2019
Acquisition of SAB
and SFT (JV with Sparda)

20202020
Launch of the Consulting
brand: Sopra Steria Next

Sopra Steria was formed from the merger in 2014 of two of France's most long-standing digital services companies, Sopra and Steria, founded respectively in 1968 and 1969 and both characterised by a strong entrepreneurial spirit as well as a firm collective commitment to serving their clients. The Group has reinforced its position as a European leader in digital transformation.

Key points of the corporate plan

An independent model

An independent model built on long-term vision and business performance, upholding the Group's responsibilities to the environment and to its stakeholders as a good corporate citizen.
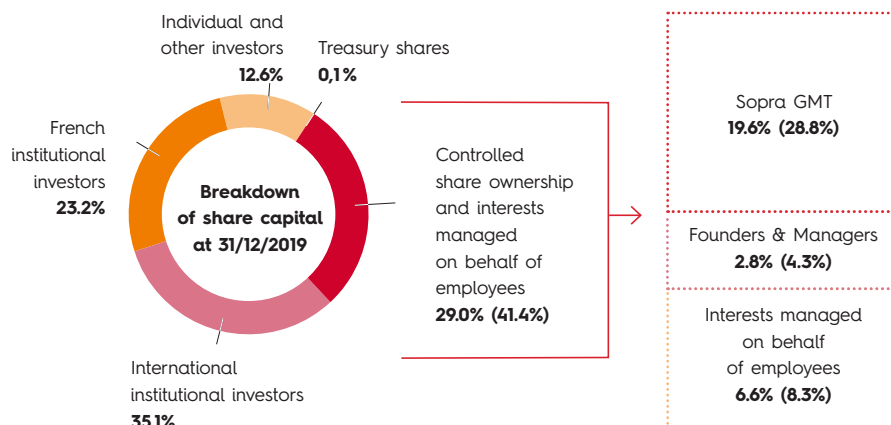
Entrepreneurial culture

By its very nature, the Group is agile, has short decision-making circuits, and moves rapidly. The core values are a dedication to serving clients, managers' autonomy, a sense of collective responsibility and respect for others.

Importance of human capital

A human resources policy with demanding objectives, focused on attracting talented individuals with both expertise and a strong team orientation as well as the development of employees' skills.

See Chapter 1
for more information

A key shareholder backing the corporate plan

Breakdown of share capital at 31/12/2019

Individual and other investors
12.6%

Treasury shares
0,1%

French institutional investors
23.2%

International institutional investors
35.1%

Controlled share ownership and interests managed on behalf of employees
29.0% (41.4%)

Sopra GMT
19.6% (28.8%)

Founders & Managers
2.8% (4.3%)

Interests managed on behalf of employees
6.6% (8.3%)

20,547,701 listed shares
26,476,317 exercisable voting rights
XX.X% = percentage of share capital held.
(XX.X%) = percentage of exercisable voting rights.

TPI survey of identifiable holders of shares at 31/12/2019 – Ownership threshold of over 1,000 shares

See Chapter 7
for more information

Our mission and values

Our mission

Technology opens up infinite opportunities.
This perpetual flow of innovation is fascinating and raises many questions as to what is actually behind the frantic race for novelty and change.
There are many answers and they are neither simple nor obvious.

At Sopra Steria, our mission is to guide our customers, partners, and employees towards bold choices by leveraging digital to build a positive future for all.
In addition to technologies, we have faith in collective intelligence and believe it helps the world move forward.

Together, we are building a decisively promising future through conscious change; lasting solutions that have a positive impact on women and men, deliver tangible results in the long term, and fully integrate interactions between the digital world and society.
We are just at the beginning of what we can do together.

Daring together

At Sopra Steria, we strive to create an invigorating team environment and a space for freedom and discussion that fosters skills development and entrepreneurship within a community driven by our desire to succeed together.

Values that bring us together

Putting customer service first

Respect for others

Desire for positive action

Professional excellence

Importance of belonging to a group

Openness and curiosity
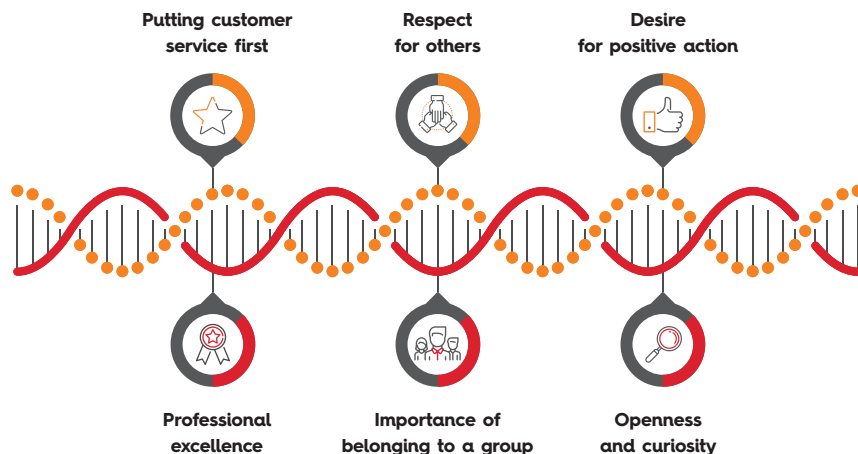
Putting customer service first

We work alongside our clients over the duration to develop their performance and enable them to go even further thanks to our in-depth knowledge of their business sector and innovative technologies.

Professional excellence

We offer our visionary and global approach and our extensive know-how to guide our clients, partners and employees towards making daring choices and enable them to transform opportunities into tangible and lasting results.

Respect for others

We firmly believe that working together is a strength and that the best solutions are found together. That is why we are always there to listen and foster a close relationship with our clients, partners and employees.

The importance of belonging to a group

We firmly believe that collective intelligence, combining team spirit and each person's individual talents, helps to transform and achieve progress in the world on a lasting basis, beyond just technology.

The desire for positive action

We want to make innovation useful for as many as possible and come up with sustainable solutions with positive impacts that take full account of interactions between digital technology and society in a way that is responsible and ethical.

Openness and curiosity

We encourage people to be daring, curious and take responsibility to explore new paths and make use of innovative new technologies that will allow for transformations that benefit us all.

Corporate responsibility

Building a positive future for all

A corporate responsibility strategy founded on our values, convictions and a high level of commitment across the Group.

At Sopra Steria, we firmly believe that digital technology can create opportunity and progress for all. When closely linked to humanity, it creates a virtuous circle that benefits society as a whole. Sopra Steria has chosen to be a "contributive" company involved in building a sustainable world in which everyone has a part to play.

We see our contribution as sustainable, human and guiding.

Seven key priorities, all directly aligned with the Group's business model, underpin its corporate responsibility strategy:

- Benchmark employer
- Constructive, transparent dialogue with stakeholders
- Long-lasting partnerships for our clients
- Involving the entire value chain in our corporate social responsibility approach
- Reducing our environmental impact and contributing to a net-zero carbon economy
- Ethical business conduct
- Supporting local communities

Combating climate change

- The Science Based Targets initiative (SBTi) approves the Group's greenhouse gas emissions reduction targets,[1] aligned with the aim of limiting average global warming to 1.5°C, as called for by the United Nations

- Commitment to cut GHG emissions per employee by 85% by 2040 (baseline year: 2015)

Benchmark employer

- Group-wide programmes to promote gender equality and diversity

- Launch of the Next Forum by Sopra Steria Next – 2020 topic: "Foundations of digital ethics, trust and corporate social responsibility"

- Agreement with Sciences Po to launch the Technology, Governance and Institutional Innovation Chair

Significant progress in 2019

- **Recruitment:** 10,844 new staff

- **More female employees:** 32% of the Group's workforce (31.6% in 2018) and 33.1% of new staff (32.8% in 2018)

- **Higher proportion of employees with disabilities:**[2] 3.06% (2.72% in 2018)
  - Urban accessibility awareness campaign
  - 32 grants awarded to secondary school and university students with disabilities

- **450 young graduates helped towards reintegration into employment**

- **Cumulative reduction in greenhouse gases since 2015 per employee:** 36.7%
  - 10.8% reduction in 2019 alone

- **24 DigiLabs,** spaces designed for innovation to foster the emergence of innovative and sustainable solutions

- **More than 160 solidarity-based projects** supported by the Sopra Steria-Institut de France Foundation

International recognitions obtained in 2019

- **CDP Climate Change**
  Sopra Steria is named to the **A List** for the 3rd consecutive year in recognition of its environmental performance

- **CDP Supply Chain**
  Sopra Steria's performance in the environmental engagement of its supply chain earned it an **A-score**

- **EcoVadis**
  Sopra Steria attains **Advanced Gold** status for its corporate social responsibility performance

- **Happy Trainees World: 7th place**

1 Greenhouse gas emissions from business travel, offices and on-site data centres
2 Scope: France

4. Corporate responsibility

Building a positive future for all

Vincent Paris
Chief Executive Officer

"We are a group on the move, anticipating and adapting to profound changes in society and new expectations from citizens."

As a key player in the digital transformation, Sopra Steria has a responsibility to enter into commitments commensurate with the labour-related, environmental and social issues we all face.

Because our people are our most valuable asset, the Group works to recruit and retain the best talent through a combination of our values, business line priorities and employees' aspirations. We also pursue a highly engaged social policy in our relations with clients, partners, suppliers and public authorities to foster equal opportunity, diversity and inclusion for young people in the Group's various entities and geographies.

With over 46,000 employees in 25 countries and almost 11,000 new hires in 2019, we have a significant impact on employment and local development. Recruitment is a high priority to serve the Group's plans as well as a key responsibility in terms of economic activity in the areas in which we operate.

We have been working for several years to significantly reduce the environmental impact of our business and lead our value chain in a continuous improvement process. These efforts were recently recognised and validated afresh by CDP Climate Change when it included the Group in its A List – the highest level of recognition – for the third year running. In response to the environmental urgency and our stakeholders' expectations, we decided to strengthen our environmental policy for the coming years: from 2019, we set ourselves even more ambitious greenhouse gas emissions reduction targets and stepped up our action programmes to design more environmentally responsible services and solutions, notably in the area of digital sustainability.

These new targets, aligned with the trajectory of limiting average global warming to 1.5°C, have been validated by SBTi [1] and aim to achieve 85% lower per-employee greenhouse gas emissions by 2040 relative to 2015.

Lastly, in a world in which digital technology is increasingly gaining ascendancy over human involvement, we also have a responsibility not to allow the most vulnerable groups to become "digitally excluded". We are working with local organisations and non-profits to foster access to digital technology and services as well as to develop innovative digital solutions to help people in precarious circumstances and those with disabilities. Every year, more and more of our employees join forces with the Group to support community projects that put digital inclusion and the potential offered by new technologies to work for the most disadvantaged in society.

Our corporate responsibility policy is rooted in our conviction that labour-related, environmental and social performance now goes hand in hand with financial performance, and that they are mutually reinforcing. This balance between financial imperatives and the new challenges of a more sustainable society is a new paradigm for the company, and should help us build a positive future for all.

These founding principles make Sopra Steria a unique and different group. We are a group on the move, anticipating and adapting to profound changes in society and new expectations from citizens.

Foreword

For this second year of implementing new regulations on the disclosure of non-financial information, Sopra Steria is publishing a Corporate Responsibility Report within its Registration Document containing information (related to the Group's workforce, the environment, society, respect for human rights and the fight against corruption and tax evasion) that is relevant in light of the Group's main non-financial risks, as required for the Statement of Non-Financial Performance, but also to voluntarily disclose all labour-related, environmental and social information deemed useful and important in the context of Sopra Steria's Corporate Responsibility programme

A description of the Group's business model is provided in the introductory section "Business model and value chain" section of the integrated presentation of Sopra Steria on pages 8 and 9 of this Universal Registration Document..

Key risks, the methodology, and policies, procedures and actions associated with managing and controlling those risks – including non-financial risks – are set out in Chapter 2: "Risk factors and internal control", on pages 35 to 42 of this Universal Registration Document

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(1) SBTi: The Science Based Targets Initiative offers mathematical models for identifying the environmental footprint of activities so as to be able to set ambitious greenhouse gas emissions reduction targets.

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CORPORATE RESPONSIBILITY
Sopra Steria, a committed and responsible Group, making a sustainable, human and enlightened contribution

1. Sopra Steria, a committed and responsible Group, making a sustainable, human and enlightened contribution

1.1. Overview of the Group's corporate responsibility strategy and governance

A strategy based on our values, convictions and a high level of commitment across the Group

At Sopra Steria, we firmly believe that digital technology can create opportunity and progress for all. When closely linked to humanity, it creates a virtuous circle that benefits society as a whole. Sopra Steria has chosen to be a "contributor" company involved in building a sustainable world in which everyone has a part to play.

We see our contribution as sustainable, human and guiding.

Sustainable: we see our actions – whether in running our businesses or helping our clients with their digital transformation – as part of a long-term approach. Our approach in support of a more sustainable world encompasses all our environmental, social, ethical and inclusive commitments.

We are committed:

- to significantly reducing our greenhouse gas emissions and to combating climate change with the involvement of our stakeholders;
- to anticipating the key business needs of the future;
- to ensuring inclusion and development for talented people both within the Group and in society more widely; and
- to putting our core values and ethical principles into practice in the day-to-day operation of our businesses and acting for a more inclusive digital society.

Human-centred: our activities are focused on implementing projects that foster digital inclusion, equal opportunity and social open-mindedness. We have been committed for a number of years to education for young people, access to employment for people with disabilities and career development for women.

Guiding: our contribution is rooted in our ability to anticipate, understand and translate the challenges posed by digital technology so as to be able to better assess their impacts on everyday life. We are thus able to help our clients meet their own sustainability challenges. We are working with our ecosystem and contributing to the debate on the impact of digital technology on society to inform our work in favour of the responsible use of digital technology.

Seven key priorities, all directly aligned with the Group's business model, underpin its corporate responsibility strategy:

- being a leading employer that attracts the best talent, fosters employee dialogue and promotes diversity and equal opportunity;
- being a long-lasting partner for our clients, meeting their needs as effectively as possible by providing them with the best technology as part of a responsible and sustainable value-creating approach;
- establishing ongoing constructive and transparent dialogue with our stakeholders;
- reduce the environmental impact of our operations, promote digital sustainability and contribute to an economy with net-zero greenhouse gas emissions;
- engage all our stakeholders to help build a more sustainable world;
- acting ethically and with integrity in our day-to-day operations and across all our business activities;
- supporting local communities by stepping up our community engagement initiatives, notably in the area of digital inclusion.

This strategy is based on our commitment to the UN Global Compact and the materiality matrix used to assess the various challenges facing the Group. A dedicated governance structure coordinates implementation of policy and associated improvement plans.

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CORPORATE RESPONSIBILITY
Sopra Steria, a committed and responsible Group, making a sustainable, human and enlightened contribution

1.1.1. A LONG-TERM COMMITMENT TO THE UN GLOBAL COMPACT

WE SUPPORT
UN GLOBAL COMPACT

❚ HUMAN RIGHTS, INTERNATIONAL LABOUR STANDARDS, ENVIRONMENT AND ANTI-CORRUPTION COMMITMENTS

As an expression of our values, Sopra Steria is a signatory of the United Nations Global Compact, in the "Global Compact Advanced" reporting category (top 8%). Through this commitment, Sopra Steria supports the Global Compact's 10 principles in the areas of human rights, international labour standards, the environment and anti-corruption. The Group also undertakes to promote these principles within its sphere of influence and to continue with its own efforts along these lines.

Frame of reference	The ten principles of the Global Compact	Sopra Steria's commitments
Human rights		
The Global Compact draws on the Universal Declaration of Human Rights. Human rights are the inalienable rights of all people, regardless of nationality, place of residence, sex, ethnic or national origin, colour, religion, language or any other criterion.	**1.** Support and respect the protection of internationally proclaimed human rights **2.** Make sure we are not complicit in human rights abuses	See "Social responsibility", Section 2., page 107: "Diversity and equal opportunity", "Health and safety", "Labour relations"; see "Societal responsibility", Section 3., page 114: "Responsible purchasing", "Community and patronage"; see "Ethics and compliance", Section 5., page 128: "Measures to prevent and combat corruption", "Data protection" and "Duty of care and vigilance plan"
International labour standards		
The Global Compact refers to the ILO (International Labour Organization) Declaration on Fundamental Principles and Rights at Work (1998).	**3.** Uphold the freedom of association and the effective recognition of the right to collective bargaining **4.** Eliminate discrimination in respect of employment and occupation **5.** Contribute to the effective abolition of child labour **6.** Contribute to the elimination of all forms of forced and compulsory labour	See "Social responsibility", Section 2., pages 107: "Maintaining and developing skills", "Labour relations", "Diversity and equal opportunity", "Health and safety"
Environment		
The Global Compact draws on some of the principles of the Rio Declaration on Environment and Development (1992) such as the precautionary principle, and on section 30 of the Rio Summit's Agenda 21 report setting out the role of businesses in sustainable development.	**7.** Support a precautionary approach to environmental challenges **8.** Undertake initiatives to promote greater environmental responsibility **9.** Encourage the development and diffusion of environmentally friendly technologies	See "Environmental responsibility", Section 4., page 120
Fight against corruption		
This principle refers to the United Nations Convention against Corruption.	**10.** Work against corruption in all its forms, including extortion and bribery	See "Measures to prevent and combat corruption", Section 5.3., page 129

❚ CONTRIBUTION TO THE UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS (SDGS)

The Sustainable Development Goals are the 17 global priorities adopted by the United Nations General Assembly for the period to 2030. Together they form a plan of action for peace, humanity, the planet and prosperity.
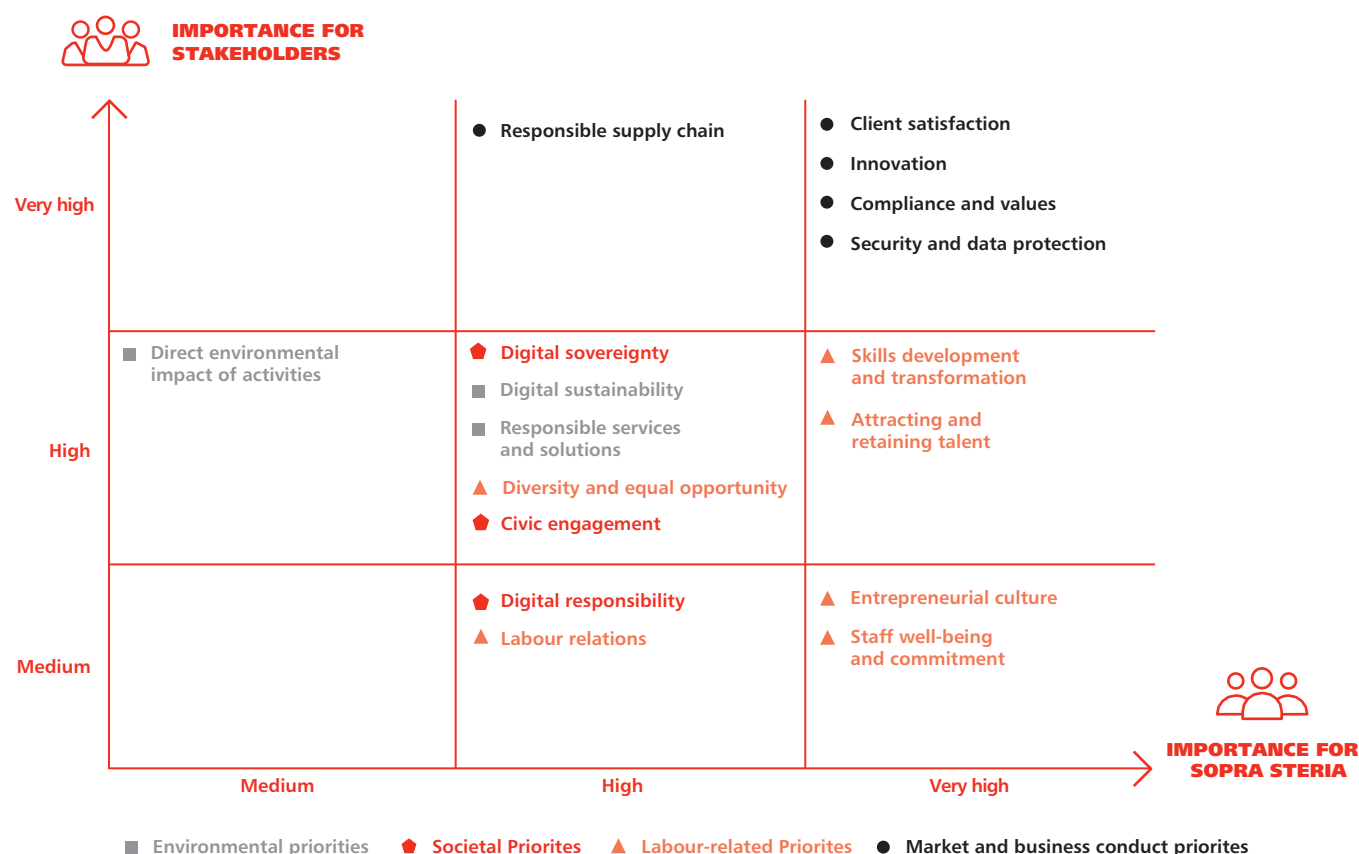
Through its corporate responsibility programmes targeting social, societal, environmental and ethical goals, Sopra Steria directly or indirectly supports the 17 United Nations SDGs. This contribution is presented in the various policies and results set out in this report.

1.1.2. MATERIALITY ANALYSIS OF KEY ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG) FACTORS ALIGNED WITH THE BUSINESS MODEL

Materiality analysis helps identify and rank the material and stakeholders. By 2022, seventeen priorities have been identified as directly aligned with the Group's business model and strategy described in the integrated presentation of Sopra Steria, on pages 8 and 11 of this Universal Registration Document. The analysis is shown graphically in the form of a matrix plotting the significance of priorities for the Group (x-axis) against their significance for the organisation's external stakeholders (y-axis).

IMPORTANCE FOR STAKEHOLDERS

Very high
- Responsible supply chain
- Client satisfaction
- Innovation
- Compliance and values
- Security and data protection

High
- Direct environmental impact of activities
- Digital sovereignty
- Digital sustainability
- Responsible services and solutions
- Diversity and equal opportunity
- Civic engagement
- Skills development and transformation
- Attracting and retaining talent

Medium
- Digital responsibility
- Labour relations
- Entrepreneurial culture
- Staff well-being and commitment

Medium — **High** — **Very high**

IMPORTANCE FOR SOPRA STERIA

■ Environmental priorities   ⬠ Societal Priorites   ▲ Labour-related Priorites   ● Market and business conduct priorites

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CORPORATE RESPONSIBILITY
Sopra Steria, a committed and responsible Group, making a sustainable, human and enlightened contribution

ENVIRONMENTAL PRIORITIES

■ Reducing the direct environmental impact of our business management

■ Enhancing digital sustainability in the value chain

■ Raising awareness and helping clients deal with their own environmental challenges

SOCIETAL PRIORITIES

⬠ Helping European countries restore their digital sovereignty

⬠ Pursuing Group's and employees' commitment to building a more sustainable and responsible world

⬠ Contributing to discussions on the impact of digital technology and developing responsible digital ambitions

LABOUR-RELATED PRIORITIES

▲ Developing employability and aligning employees' skills with new client needs

▲ Attracting and retaining the best IT and digital talent on the market

▲ Fostering an entrepreneurial culture within teams, combining creativity and team spirit

▲ Fostering employee growth and strengthening their commitment

▲ Preventing any form of discrimination and promoting equal access to employment opportunities

▲ Establishing constructive dialogue for the Group's expansion and employee growth

MARKET AND BUSINESS CONDUCT PRIORITIES

● Leveraging Group's strongest selling points: Close client relationships, responsiveness, reliability and delivery quality.
Reaching and maintaining a state-of-the-art level of industrialisation

● Helping clients with their digital transformation by anticipating the best technology and solutions on the market

● Ensuring regulatory compliance and building stakeholder relations around Group values

● Securing operations and providing data protection for employees and clients

● Working with suppliers and service providers aligned with the Group's corporate responsibility priorities

Key issues resulting from the materiality analysis, associated policies and key results are broken down in the various sections of this Corporate Responsibility Report (Chapter 3).

The priorities resulting from the materiality matrix define the framework for action under Sopra Steria's corporate responsibility programme.

1.1.3. A CORPORATE RESPONSIBILITY GOVERNANCE STRUCTURE SUPPORTING THE GROUP'S PRIORITIES

Governance is organised around a dedicated Group department and four interdependent units supported by functional and operational departments.

Group Corporate Responsibility and Sustainable Development Department

Reporting directly to Executive Management, the Corporate Responsibility and Sustainable Development (CR&SD) Department establishes the framework governing the Group's corporate responsibility strategy, raises awareness and mobilises efforts, coordinates action plans and reporting, and analyses and assesses performance. It is supported by the relevant departments and divisions and a network of representatives within each entity.

Its role is, in particular, to help entities manage risks and promote corporate responsibility goals to:

■ structure policies and procedures;

■ define shared indicators to strengthen consistency and coordination of the corporate responsibility strategy, taking into account regulatory and cultural characteristics specific to local businesses and geographic areas.

Each year, the strategy, issues and key achievements relating to corporate responsibility are presented for discussion to the Nomination, Governance, Ethics and Corporate Responsibility Committee of the Board of Directors.

Market Responsibility unit

On a day-to-day basis, this unit works with operational departments to help respond to the specific needs of clients and the Group's partners in relation to corporate responsibility and sustainable development. The unit is coordinated by the CR&SD Department at

Group level. It is managed in close cooperation with Group departments responsible for particular aspects of market responsibility, particularly as regards ethics and compliance (Internal Control and Risk Management Department and Legal Department) and responsible purchasing (Purchasing Department). Projects relating to responsible solutions and services are led by the CR&SD Department and the relevant business line and industrial automation departments.

Responsible Employment unit

Responsible employment is a key priority for the Sopra Steria Group. It is overseen by the Group Human Resources Department which oversees social reporting. This department works with Executive Management to determine employee policy, with key programmes to speed up recruitment of top professionals, bolster skills development and develop initiatives relating to workplace well-being, equal opportunity and diversity.

Environmental Responsibility unit

The Environmental Responsibility unit oversees the Group's environmental programme and climate protection initiatives taken by the Group and for its clients as well as its annual reporting. Its work involves the participation of a number of central departments (Real Estate & Purchasing, Information Systems, Industrialisation and operational departments) that roll out their action programmes to local entities. The unit, which is overseen by the CR&SD Department, is supported by a network of environment correspondents, together forming the Group Environmental Sustainability Committee or GESC, spanning all entities and countries.

Community Engagement unit

Each Group entity implements community action programmes adapted to the needs of its local communities. This unit oversees the actions of the Sopra Steria-Institut de France Foundation. Its activities are carried out under the supervision of the Group CR&SD Department, which determines an engagement framework for the Group and coordinates the network of local stakeholders.

Two bodies rounding out the oversight system

To strengthen management arrangements within each of these units, the corporate responsibility policy is supported by two Group-level bodies.

Corporate Responsibility and Sustainable Development Committee

The Corporate Responsibility and Sustainable Development Committee (CR&SD Committee) is chaired by the CR&SD Director, who is a member of the Group Executive Committee. It brings together division heads as well as representatives of the departments and entities involved in the Group's programme in this area.

The Committee's role is to monitor the roadmap and progress against associated action plans. It meets twice a year. Depending on the issues at hand, more specific interim meetings may be held throughout the year with the relevant central departments, as well as Group entities and operational departments.

Corporate Responsibility Advisory Board

The purpose of the Advisory Board is to provide external feedback on the various components of the Group's corporate responsibility approach. It consists of four external experts and key Group managers with responsibility for business units and major issues. This committee meets twice a year.

In 2019, the Advisory Board's membership included the following four independent experts:

- Marie-Ange Verdickt, former Director of Research and Socially Responsible Investment at La Financière de l'Échiquier, a company director working with institutions that champion social development;
- Patrick Bourdet, former founder and Chairman and CEO of Areva Med, an executive consultant and coach working with educational and child welfare bodies;
- Mark Maslin, Professor of Climatology at University College London (UCL), an expert in climate change and author of numerous studies and publications on climate issues;
- Frédéric Tiberghien, an honorary member of France's Council of State, Chairman of Finansol and Honorary Chairman of ORSE (Observatoire de la Responsabilité Sociétale des Entreprises – Observatory of Corporate Social Responsibility).

1.2. Major recognition

In 2019, Sopra Steria received major recognition in the areas of corporate responsibility and sustainable development.

- The Group is ranked at Gold Advanced level, putting it in the top one percent of companies assessed by EcoVadis in the area of corporate responsibility.

- The Group scored "A" for environmental performance, the highest score awarded by CDP Climate Change. This is the third consecutive year the Group has been on the A List.
- CDP Supply Chain: Sopra Steria achieved a CDP Supply Chain score of A- in 2019.

- Sopra Steria achieved a Gaia rating score of 86 out of 100, making it one of the top companies in the Gaia Index for the eleventh year running.

In 2019, in light of its environmental, ESG (environmental, social and governance) and sustainable development performance, the Group was added to the following indices:

- Euronext® CDP Environment France EW;
- Euronext® CDP Environment ESG France EW;
- Euronext® CDP Environment France Ex Oil & Gas EW;
- Ethibel Sustainability Index (ESI) Excellence Europe;
- Ethibel Sustainability Index (ESI) Excellence Europe VM;
- Gaia Index.

1.3. Overview of reporting scope

The Corporate Responsibility Report, presented in the 2019 Universal Registration Document, aims to set out the non-financial information that is most relevant to the Group in light of its business model, its activities, key issues arising from the materiality matrix and the key risks facing the Group.

The information required to draw up this report is collected in accordance with a reporting procedure. This procedure is reviewed annually to take into account changes in the Group's scope and reporting approach and, with effect from 2018, new regulatory requirements arising from Ordinance 2017-1180 of 19 July 2017 on disclosure of non-financial information.

Based on regulations in force and taking into account the specific nature of its business activities, Sopra Steria measures the Group's progress in five areas of corporate responsibility: Workforce, Society, Environment, Ethics and Compliance, and Human Rights.

This report includes a significant amount of information pertaining to Articles L. 225-100 and L. 225-102 of the French Commercial Code and Articles 70 and 173 of the Energy Transition for Green Growth Act, its implementing decree n°2017-1265 of 9 August 2017, consistent with the general principles laid down in the guidelines of the GRI (Global Reporting Initiative) and aligned as closely as possible with the seven core subjects addressed by ISO 26000.

Furthermore, pursuant to the seventh paragraph of Article L. 225-102-1 of the French Commercial Code, Sopra Steria has appointed Mazars as independent third party to verify that the Statement of Non-Financial Performance complies with the provisions laid down in Article R. 225-105 of the French Commercial Code and that the information provided pursuant to point 3 of the first and second paragraphs of Article R. 225-105 of the French Commercial Code, disclosed in this report pursuant to Article R. 225-105-2 of the French Commercial Code, is truthful.

Definitions of social indicators

Unless otherwise indicated, indicators are calculated on the basis of numbers of employees on permanent and temporary contracts and internship agreements. The following definitions are used:

- permanent contract: Full-time or part-time employment contract entered into with an employee for an indefinite period;
- fixed-term contract: Full-time or part-time employment contract entered into with an employee and expiring at the end of a specific period or on completion of a specific task lasting an estimated period;
- frequency rate of workplace accidents in France: Calculated in business days, using the following formula: (Number of workplace accidents with work stoppage × 1,000,000)/Total number of hours worked by total workforce in the year;
- severity rate of workplace accidents in France: (Number of working days lost due to workplace accidents × 1,000)/Total number of hours worked by all employees during the year. Work stoppages continuing on from the previous year are not counted. Work stoppages continuing on as a result of workplace accidents that occurred the previous year are not counted;
- absence rate: Calculated in business days and on the basis of the average full-time equivalent workforce. It takes into account absences for illness, workplace accidents and accidents while travelling. It corresponds to the ratio of the number of actual calendar days' absence and the number of work days theoretically available;
- percentage of employees with a disability: Based on the number of employees with a declared disability, each considered as a "disabled worker unit" in France, increased by 50% where allowed under the rules applied by the French government agency Agefiph, which promotes the employment of people with disabilities + number of beneficiary units under subcontracting contracts with companies in the sheltered or adapted sector, divided by the relevant workforce. The workforce numbers used are also calculated according to the rules defined by Agefiph.

Scope of reporting

To ensure compliance with regulations, the Group has developed a reporting process for collecting the relevant data and leveraging the results in this document.

The following indicators (required by Article L. 225-102.1 of the French Commercial Code) have been excluded since they do not apply to Sopra Steria Group's business: combating food waste and food insecurity, promoting animal welfare and responsible food production.

Sopra Steria's corporate responsibility policy applies to all Group entities. The headcounts provided in the workforce section of this report and used in certain environmental indicators include the employees of Delta Development System in Algeria (3 people), a non-consolidated subsidiary of the Group.

Depending on the indicator, the geographic scope is either:

- the full worldwide scope of Sopra Steria Group businesses (i.e. Sopra Steria Group);
- all Sopra Steria Group businesses in a given country (Sopra Steria France, Sopra Steria UK, Sopra Steria España, etc.). For each country, all Sopra Steria Group subsidiaries are included (Sopra Banking Software, Sopra HR Software, I2S, CIMPA, Kentor, Beamap, Cassiopae, Galitt, 2MoRO, BLUECARAT, it-economics et OR System, etc.);
- as regards the scope of workforce indicators:
  - companies consolidated in 2018 (Galitt and APAK) are included in all indicators shown,
  - for Groupe SAB, Neosphere, Sopra Banking Software Senegal and Sopra Financial Technology Gmbh, which joined the consolidated Group during 2019, only the "Total workforce" indicator has been calculated. The scope is specified for each indicator,
- as regards the scope of environmental indicators:
  - the employee headcount at two of the companies acquired in 2019 (Apak and Neosphere) was included when calculating all indicators,
  - the employee headcount at two of the other companies acquired in 2019 (Groupe SAB and Sopra Financial Technology GmbH) was only included when calculating the "Workforce by geographic region" indicator,
  - the scope of 2019 environmental reporting spans all entities over which the Group has both financial and operational control. It thus includes the NHS SBS and SSCL joint ventures, but Groupe SAB and Sopra Financial Technology Gmbh are not taken into account for all indicators,
  - the emissions factor relating to leases of IT equipment was updated in 2019 to calculate the environmental footprint of the Group's purchases. The update for this emissions factor was applied to the data for 2018, leading to an adjustment to the result for that year;
- corporate responsibility reporting covers the calendar year from 1 January to 31 December 2019. Any exceptions to calendar year reporting are indicated in respect of the data concerned.

To check consistency between financial and non-financial reporting, some structural indicators common to both areas are compared and verified at various levels of detail.

An overview of the reporting process and reporting tools relating to this report is set out in the reporting protocol available on request from Sopra Steria's SD&CR Department.

2. Social responsibility: A committed and responsible collective

Sopra Steria is a signatory of the United Nations Global Compact, in the "Global Compact Advanced" reporting category (top 8%). Under this commitment, Sopra Steria supports the Global Compact's ten principles, including in particular those relating to human rights and international labour standards.

Sopra Steria supports the United Nations Sustainable Development Goals 1, 3, 4, 5, 8, 10, 11 and 17 related to employment.

It adheres to the principles and fundamental entitlements of the Universal Declaration of Human Rights adopted by the United Nations General Assembly in 1948 and the European Union's Charter of Fundamental Rights, and abides by the eight fundamental conventions of the International Labour Organisation (ILO).

The Group is notably committed to:

- comply with European Community and domestic labour law and collective bargaining agreements in each country where the Group operates or, if necessary, put in place measures intended to improve relations between management and labour;
- upholding, in particular, freedom of association and the right to collective bargaining in each relevant country, the elimination of forced or compulsory labour and the effective abolition of child labour.

The Group's corporate responsibility policy is aligned with these commitments. It also aims to comply with the principle of equal opportunity, in terms of both hiring practices and career development for employees, and to protect health, safety and dignity in the workplace for each of its employees.

The Group's ambition is to attract the best professionals of all kinds, to anticipate future skills requirements through a broad range of professional and innovative digital training, and to promote internal mobility. These ambitions and a working environment nurturing professional development in which everyone feels valued, help to attract and retain its talent.

2.1. Responsible employment challenges

The Group is transforming itself to increase its value to clients by addressing their business challenges, combining its various service offerings as part of an end-to-end approach, incorporating digital technology at every level and developing its employees' ability to constantly adapt to technological and market changes.

Against this backdrop, Sopra Steria's ambitions in relation to responsible employment practices entail five types of challenges for the Group:

- as regards **attractiveness,** attracting the best digital professionals and **retaining** talent to support the Group's development;
- as regards **maintaining** and **developing skills,** developing and aligning employees' skills to proactively meet clients' current and future needs;
- as regards **diversity** and **equal opportunity**, addressing issues of importance in the public interest, preventing any form of discrimination particularly by fostering access to employment for people with disabilities, promoting gender equality in the workplace and access to employment for young people;
- as regards **labour relations**, forging with employee representatives a constructive dialogue and negotiations to plan ahead for and support the major changes affecting the Group;
- as regards **health** and **safety**, offering an environment conducive to quality of life in the workplace.

The labour-related challenges set out above are not all key risks for the company as defined in the Statement of Non-Financial Performance. Given the nature of the Group's business, only attractiveness and maintaining and developing skills are key risks for the Group and treated as such in the "Risk factors" section (see Chapter 2, "Risk factors", page 36 of this Universal Registration Document).

Policies, actions and achievements associated with these five challenges are described below.

2.1.1. ATTRACTING AND RETAINING MORE TALENT

The fast-growing digital sector is a strategic sector of the economy making a significant contribution to countries' growth. This situation implies a highly dynamic global labour market in the sector, leading to a war for talent and a level of turnover reflecting this positive momentum.

To attract and retain more talent, the Group must be a leading player in the digital sector, acting boldly and decisively. To meet these challenges, three innovative policies have been implemented to promote close contact with applicants and employees through personalised support.

These policies, which form part of a long-term strategy aimed at ensuring the transparency of our HR practices, are broken down as follows:

1. **The employer brand policy** aims to increase awareness of the Group among applicants and employees through HR marketing and communications campaigns designed to share the Group's values.

2. **The recruitment policy** is deliberately aimed at hiring young graduates as well as hosting interns and work-linked training students, thus contributing to the national effort to promote access to employment for young people. It is based on the principle of equal opportunity and non-discrimination. It is aligned with new uses for digital technology and the transparency demanded by today's job seekers. This policy is structured around four main priorities:

- promoting jobs in the digital field to attract more young people and, in particular, young women;

- making a meaningful difference: offering an enriching experience through civic projects (see 2019 achievements above);

- facilitating transparency: free exchanges between employees and candidates via sites like PathMotion and Glassdoor;

- fostering mobility: responding to students' wishes for more fulfilling career options by offering opportunities for international job moves.

3. **The retention policy** is based on a robust policy of induction and integration – a key ingredient in the retention of both new recruits, most of whom are young, and employees joining the Group as a result of mergers and acquisitions. More generally, it responds to employees' expectations and needs by offering a stimulating work environment. It is supported by three key processes:

- a specific induction process for young people and another tailored to inductees' seniority. These two processes help new recruits gain an understanding of and share the Group's culture, values and fundamentals;

- an ongoing career and skills assessment and development process to maintain staff employability (see the next section as well);

- an international Group employee share ownership programme to give all employees a more meaningful stake in the company's performance.

2019 achievements

- The number of new hires declined slightly but was in line with targets; 10,844 new hires (vs. 11,662 in 2018), with an increase in the proportion of women (33.1%, vs. 32.8% in 2018) and of under-25s (up 16% relative to 2018) hired, in line with the goal of boosting the Group's appeal as an employer.

- High-visibility civic projects: HandiTutorat (academic tutoring for secondary school students with disabilities), HandiVoile (inclusion of disabilities at a sports event) and the Science Factor competition: supporting the winning "Handinumérique" project (a competition to foster the emergence of citizen-led ideas and innovation projects with a positive impact on society, the economy or the environment, involving equal numbers of girls and boys).

- Increase in the number of interns and students on work placements thanks to dynamic partnerships with schools: 1,562 interns hosted in 2019, compared with 981 in 2018, an increase of 59.2% across 64.6% of the relevant scope (Belgium, France, Germany, Italy, Luxembourg, Morocco, Netherlands, Spain, Switzerland and Tunisia); 837 students on work placements in 2019, compared with 702 in 2018, an increase of 19.2% across 42.3% of the relevant scope (France); and 1,000 school initiatives in 2019 (51% of the relevant scope: France, Germany, Poland).

- Moved higher in rankings:
  - LinkedIn: 41% more followers (274,000 in 2019, up from 194,000 in 2018),
  - Happy Trainees France: up six places in France (ranked ninth in the Happy Trainees ranking in 2019 vs. 15th in 2018),
  - Happy Trainees World: Ranked seventh in Happy Trainees World ranking in 2019,
  - Potentialpark: up five places in 2019, moving from the 15th to the 10th spot among French companies in the top 100 of the CAC 40 and SBF 120 ranked in relation to their use of digital channels for recruitment,
  - Universum: up four places in 2019 from the 79th to the 75th, based on a panel of 37,578 students.

- International job moves for employees and students: 275 in 2019 vs. 196 in 2018, including 76 interns and students on work placements, compared with 112 in 2018 (this decline is due to a change in Indian visa requirements that means French interns can no longer go to India); 17 destinations in 2019 vs. 13 in 2018.

- Overhauled induction programme to be rolled out in 2020.

- Increase in the percentage of employees under 30 in the workforce: 25.6% in 2019 vs. 24% in 2018 (excluding new hires in the year).

- Group turnover of 17.7%, slightly up (2018: 16.9%) but still below the digital sector as a whole in countries where the Group has a presence. This reflects, in particular, the sector's strong momentum.

- **Findings of the Great Place to Work survey:** 78% of employees responding to the survey felt that "New employees receive a good welcome".

82% participation rate
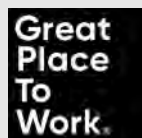
In 2019, Sopra Steria launched a survey of its entire workforce. This survey, run with the help of **Great place to Work,** forms part of an overarching approach to transformation in which the Group's employees are the key stakeholders. More than 80% of employees responded to the questionnaire, the results of which are helping us better understand their relationship to their work, the company, management and colleagues. The results included a number of noteworthy findings, highlighting in particular the Group's strengths in the areas of social responsibility, inclusion and friendliness. However, they also pointed to a need for more information on HR processes, and in particular review cycles, as well as more opportunities for informal chats with management. As soon as the survey results had been made available, all entities (countries and subsidiaries) embarked on a continuous improvement process, involving each and every employee in defining concrete action plans so as to meet challenges and speed up transformation. This Group-wide survey will be repeated annually.

2019-2021 performance indicators

- Target of scoring 4/5 on Happy Trainees world within three years: 3.88/5 in 2019 → in line with the target.
- 41% increase in social media followers → exceeding the target of 25% for 2019.
- Target of increasing % of employees under 30: → up 1.2 percentage points between 2018 and 2019 → in line with the target.

2.1.2. MAINTAINING AND DEVELOPING SKILLS

The far-reaching changes in our clients' businesses caused by the digital revolution mean we must constantly be adapting our skills to meet their current and future needs.

To respond to these business challenges, the Group's skills maintenance and development policy forms part of an approach intended to:

- anticipate changes in our businesses to better serve our clients and in line with the goals of the Group's corporate plan;
- develop our employees' skills and help them manage their career development, maintain their employability and improve performance;
- sustain motivation and develop engagement to promote well-being and personal fulfilment for everyone.

To meet these challenges, the Group has launched the following initiatives:

- annual updates of the Group's digital Core Competency Reference Guide to provide a shared framework for understanding our businesses, appraising employees and supporting career development;
- provision of a common performance appraisal system based on ongoing dialogue between employees and their managers. Appraisals are shared at HR committees and give rise to individual development plans;
- annual implementation of the "People Dynamics" process to identify far-reaching changes affecting our businesses over the next one to three years (emerging jobs where there is positive pressure, and/or that are sustainable or sensitive) and draw up HR action plans for integrating, maintaining and developing the required current and future skills.

These initiatives will be supplemented by a proactive training policy, which constitutes one of the primary vehicles for adapting our people's skills. This policy is supported by the Group Executive Committee and an Academy and it is aligned with the corporate plan and strategic direction.

The goal of this policy is to ensure that the Group has access to the appropriate skills at all times and in all places, particularly as project cycles accelerate. To achieve this goal, the following initiatives are being implemented across the Group:

- changes to the Academy to make it more cross-functional and more closely aligned with each country's needs: creation of business line and subsidiary Academies;
- refresh of the Academy offering and training courses, notably including "Group fundamentals, management", "Induction for new employees", "Business-specific courses", technology courses (cloud, agility, end-to-end), commerce course;
- accelerated digitalisation of programmes (e-learning, MOOCs ie Massive Open Online Courses, etc.).

2019 achievements

- Update and rollout of the Group's Core Competency Reference Guide, which now covers 100% of the Group's scope.
- Rollout of "People Dynamics" approach, covering 100% of the Group's scope.
- Rise in the number of training hours delivered: to 1,263,354 hours, up from 1,244,583 in the previous year, with a significant rise in the number of e-learning courses, which are shorter (100% of the Group's scope, workforce excluding interns).
- Digitalisation of the training offering:
  - 88% of employees trained through e-learning modules, up from 44% in 2018,
  - 28% of employees trained, excluding compliance modules (workforce not including interns),
  - 82% of employees completed Group compliance e-learning modules: information security, protection of personal data, anti-corruption legislation and disabilities (France).

2019-2021 performance indicators

- Development of digital training offering: goal of training 30% of employees via digital channels (excluding Group compliance e-learning) within three years achieved at 82%, thus well beyond the target.

2.1.3. DIVERSITY AND EQUAL OPPORTUNITY

The Group reaffirms its commitment to combat discrimination, based on the principle of equal opportunity. As such, the Group endeavours to recruit employees from a diverse range of backgrounds and to treat all employees fairly. This approach is supported by four policies:

- a gender equality policy;
- a disability policy;
- an intergenerational policy;
- a policy promoting diversity and access to employment for young people.

A gender diversity policy to develop women within the Group and support their career development at every level of the business. In particular, the Group is taking action to achieve balanced gender representation on the committee put in place by Executive Management to assist it with its duties.

This policy is implemented through specific actions to help increase the proportion of women in the workforce and in top management positions, including:

- rolling out a Group-wide policy (development, promotion, pay, etc.);
- setting numerical targets (workforce, recruitment, promotion, training, pay gap);
- introducing training programmes on women serving in leadership roles and to promote respect for all regardless of gender: specific forms of assistance for women, combating stereotypes through training and campaigns to raise awareness of how they affect decision-making processes;
- coordinating gender diversity networks in a number of countries.

2019 achievements

- Group commitment: signed the manifesto "In support of retraining for women in the digital sector" sponsored by Syntec Numérique (42.3% of the Group's scope: France) to increase recruitment and the proportion of women in jobs in the digital field (32.3% of new hires under the retraining programme were women, vs. 30.3% in 2018).
- More women in the workforce: they represented 32% of the workforce in 2019 (31.6% in 2018) and 33.1% of new staff (32.8% in 2018), despite a drop in female enrolments in information and communications technology degree programmes (13% of all students in this area in 2016, down from 15% in 2011).[1]
- Of the 10% most senior positions, 17.96% are held by women (compared to 17.92% in 2018).
- "Toget'HER For Greater Balance" Group awareness campaign: call for ideas and best practices from Group employees to attract and retain women in the digital sector and at every level of the company.
- Training programme rolled out across 81.5% of the Group's scope (France, Germany, India, Norway, Poland and the United Kingdom).
- Programmes supporting women in leadership to promote a higher proportion of women in management: Boost'Her pilot programme launched in France and women's mentoring programme launched in the United Kingdom. (56.3% of the Group's scope: France, United Kingdom).
- Over 1,000 employees are members of gender diversity networks (in France, Germany, Norway, India, the United Kingdom and Belgium) working for greater diversity in the digital sector by including more men in the approach.
- **Findings of the Great Place to Work survey:** 77% of employees responding to the survey felt that "Staff are treated fairly irrespective of gender".

A disability policy aiming to favour the recruitment and continued employment of people with disabilities through innovative initiatives in the areas of recruitment, adapting the work environment, training and awareness. Regardless of the country, the Group is committed to complying with legislation and all local regulations and recommendations in support of employment for people with disabilities.

2019 achievements

- The Group reaffirmed its commitment by signing the "Manifesto promoting inclusion in economic life for people with disabilities".
- Higher proportion of employees with disabilities: 3.06% (42.3%: France), up from 2.72% in 2018.
- Awareness-raising initiatives to foster inclusion:
  - group awareness campaign on urban accessibility in support of access to employment for people with disabilities, to coincide with the International Day of Persons with Disabilities: more than 3,500 obstacles were flagged up around the world to facilitate urban accessibility,
  - awareness-raising among employees in France: HandiTour campaigns (face-to-face workshops led by accessibility experts) and HanDigital Week (digital campaign, urban accessibility challenge and digital accessibility training): over 1,000 employees,
  - rollout of e-learning on disability in the workplace and digital accessibility (42.3% of scope: France): 13,180 employees completed the "Understanding disability in the workplace" module and 4,195 completed digital accessibility training (rolled out November 2019),
  - supported over 100 secondary school students with disabilities (through tutoring, academic support and sponsorship),
  - 300 students (engineering, business) made aware of disability-related issues at the Course Croisière Edhec race (a European sports event bringing together over 3,000 students).

The Group's intergenerational policy aims to attract talented young people while ensuring that different generations continue to be represented. The Group promotes knowledge and skills transfer – a key component of its intergenerational policy – by appointing a mentor for every new recruit aged under 26.

2019 achievements

- Balance preserved in terms of age representation: 10% of the workforce was under 25 years of age (compared with 9% in 2018) and 9% was over 55 (compared with 8% in 2018).
- Introduced a phased retirement system to facilitate the transition to retirement.

A diversity and youth employability policy to ensure access to education for all and integrate young graduates into the world of work. This policy is in line with the principle of equal opportunity and is geared towards recruiting and developing talented young people. In pursuing this policy, the Group launches specific additional actions for young people from disadvantaged areas in order to:

- **provide career guidance:** inform students about our business as soon as they enter secondary school;
- **listen and build relationships:** support secondary school students and help them understand the business world;
- **provide training for digital sector jobs:** foster inclusion and reintegration into employment for out-of-work young people.

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(1) *"Women in the digital age", European Commission study, 2016.*
  https://op.europa.eu/en/publication-detail/-/publication/84bd6dea-2351-11e8-ac73-01aa75ed71a1/language-en

2019 achievements

- **224 secondary school and university students** interacted directly with Sopra Steria employees (42.3% of scope: France):
  - **providing career guidance to 78 secondary school students from disadvantaged areas:** hosted as part of their fourth-year work experience to learn about jobs in the digital sector and demystify algorithms (unplugged activity), in partnership with the non-profit Tous en Stage;
  - **attentiveness to concerns and build relationships:** 108 secondary school students, 68 in connection with HandiTutorat in partnership with ten engineering schools and 40 high-school students were welcomed to learn about jobs in the digital sector in partnership with the Blaise Pascal Foundation; moreover, 38 students in higher education were mentored in partnership with the non-profit Tous en Stage Article 1;
- **450 young graduates helped towards reintegration into employment** through training (43.7% of scope: France and Tunisia):
  - **279 unemployed young people** recruited and trained in digital skills (**France**), **32.3% of them women** (up from 30.3% in 2018), in partnership with work integration organisations such as Ensemble Paris Emploi Compétences (EPEC), the Pôle Emploi public employment centres or the Maison des Jeunes Talents,
  - **171 young graduates with bachelor's degrees hired, 45% of them women, and helped towards obtaining a postgraduate engineering degree through a four-year pilot programme in Tunisia**: recruited onto permanent contracts and awarded scholarships to cover study costs for four years. Implemented a tailored mentoring scheme to help them integrate;
- **32 grants awarded to secondary school and university students with disabilities** to support them through their academic careers, in partnership with nonprofit FEDEEH.
- **findings of the Great Place to Work survey:** 89% of employees responding to the survey felt that "Staff are treated fairly irrespective of ethnic origin, religion or sexual orientation".

Goals for 2020: Repeat initiatives and instil the same level of momentum at Group level.

2.1.4. LABOUR RELATIONS

Labour relations are a key driver of performance for an economy in support of an inclusive collective underpinned by the Group's values. The Group's adhesion to the UN Global Compact is in keeping with its commitment to uphold freedom of association and recognise the right to collective bargaining, in line with the principles of the ILO's eight fundamental conventions.

Sopra Steria seeks to implement measures intended to improve professional relations between the company and its employees even in countries that do not have an institutional framework governing the recognition of employee representatives' status. Non-discrimination policies and procedures are implemented with regard to employee representatives.

Against this backdrop and in accordance with legislation in force in each country where the Group operates, Sopra Steria is committed to establishing constructive dialogue with employee representatives on matters relating to corporate strategy and the company's economic, financial and employee policy.

The initiatives brought about by collective bargaining increase employees' sense of belonging, ensuring that all staff are committed to the corporate plan and that the challenges posed by digital transformation are met.

The Group supports and advocates these principles in its Code of Ethics, available on the Group website and thus accessible to all stakeholders.

2019 achievements

- 49 foundational labour agreements signed and implemented (compared with 36 in 2018).
- 291 agreements in force (compared with 241 in 2018).
- 74.2% of employees covered by a company-wide agreement.

Goals for 2020: Labour relations remain a key issue for the Group's future development.

2.1.5. HEALTH AND SAFETY

Sopra Steria's **workplace health and safety policy** complies with regulatory requirements in each country in which the Group has a presence. It forms part of a preventive approach to occupational risk aimed at protecting employees' and subcontractors' health and safety, improving their working conditions and promoting workplace well-being.

The Group's businesses are concentrated in the service sector and do not involve any high-risk activities, notably in respect of workplace accidents, which occur very rarely and are related purely to the hazards of everyday life (the Group has a very low workplace accident frequency rate).

This policy of prevention and support is based on actions such as the following:

- awareness and training action plans to prevent accidents and improve employee health and safety;
- a psychological counselling and support unit. This unit, staffed by psychologists, is completely independent of the company and can be accessed anonymously, confidentially and free of charge at any time;
- health and safety committees in countries to make sure that specific processes and measures are put in place and tailored to local circumstances, since each entity is subject to its country's laws and regulations. These measures concern, in particular, buildings (security of premises, furnishings, heating and air conditioning, etc.) and food (canteen, water, etc.);
- analysis of protection and welfare mechanisms in each country;
- analysis of travel and repatriation insurance cover.

2019 achievements

- Psychological counselling unit: 81% of Group employees are eligible for this service (Belgium, France, Germany, Poland, the United Kingdom and Scandinavia).

- Work/life balance: introduction of the "right to disconnect" and remote working; 70.4% of Group employees are eligible for this service (Benelux, France, Germany, Italy, Poland and the United Kingdom).

- Training in safety rules and emergency first aid: 81.3% of employees are covered by training programmes to prevent accidents and improve employee health and safety (Belgium, France, Germany, India, Italy, Switzerland, Tunisia and the United Kingdom).

- Launched an exercise to map personal insurance and prevention measures in each country and analyse results (including social security cover, death benefit cover, early retirement and retirement), exercise to be continued in 2020.

- No occupational illnesses recognised in France by CPAM, the national health insurance body (42.3% of the Group's scope: France – national health insurance body).

- The absence rate remained nearly stable, at 2.6% in 2019, compared with 2.5% in 2018 (42.3% of the Group's scope: France).

- The workplace accident frequency rate increased in 2019 to 2.47% (1.91% in 2018, 42.3% of the Group's scope: France). This increase was linked to unforeseeable non-serious health conditions in the workforce, as attested by the decline in the severity rate.

- The severity rate was 0.023%, down from 0.056% in 2018 (42.3% of the Group's scope: France).

- **Findings of the Great Place to Work survey:** 88% of employees responding to the survey felt that "Safety conditions are appropriate".

Goals for 2020: Continue to roll out shared tools for use across the Group.

2.2. Other labour-related information

2.2.1. JOBS AND THE WORKFORCE
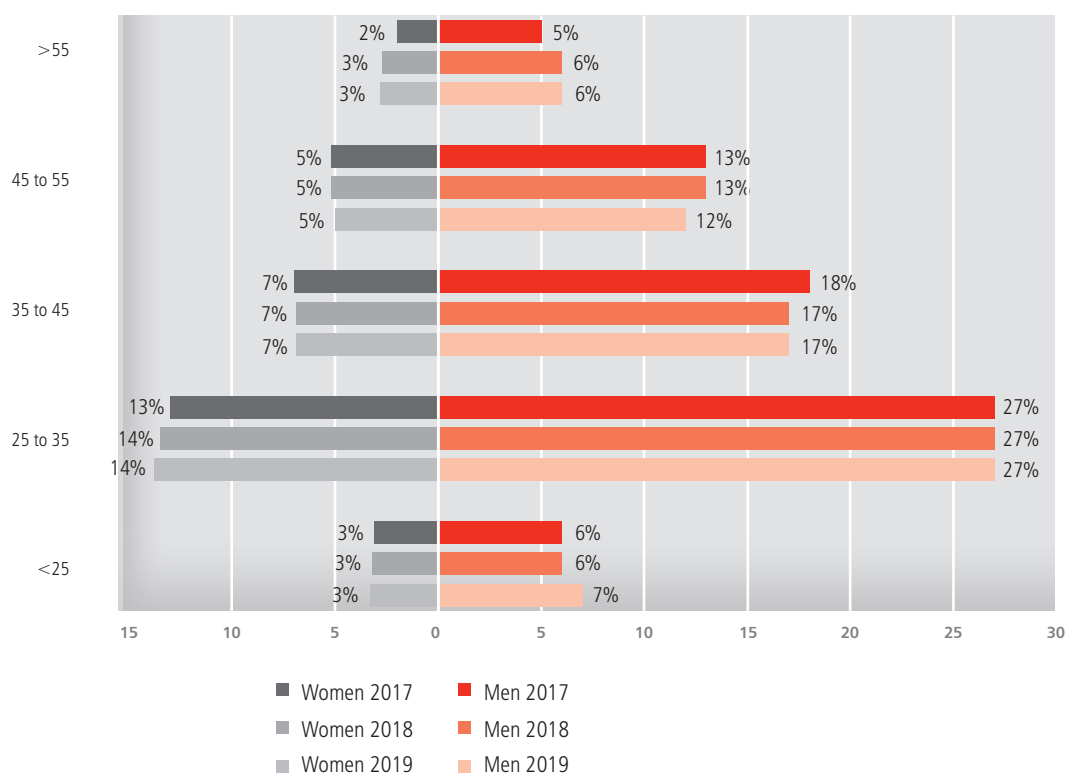
For many years, the Group's growth has been backed by a proactive employment policy of recruiting talented individuals and developing employees' skills.

External growth is also a strong driver of the Group's development and increased business volumes. Thanks to the various acquisitions completed in 2019 (1,092 employees), the Group can offer a comprehensive response to its clients' needs in the areas of transformation and competitiveness.

At 31 December 2019, Sopra Steria Group had a total of 46,245 employees (45,153 employees excluding 2019 acquisitions), mainly based in Germany, Spain, France, India, the United Kingdom and Scandinavia, which together account for 89.8% of the Group's workforce.

The proportion of permanent contracts, which was slightly higher in 2019 (96.1% in 2019, compared with 95.7% in 2018), and that of temporary contracts, which was slightly lower (3.3% in 2019, compared with 3.6% in 2018, excluding interns) demonstrate the Group's long-standing commitment to offer stable jobs while favouring the professional integration of young people on permanent contracts and on work placements (96.1% of fixed-term contracts were for students on work placements in 2019, compared with 96% in 2018).

The age pyramid illustrated below, showing the workforce breakdown for the Group (excluding acquisitions) by gender and age, has remained stable for the past three years, with a very slight improvement in the proportion of women, particularly in the 25-35 age bracket.

		>55	Women 2017: 2%	Men 2017: 5%
			Women 2018: 3%	Men 2018: 6%
			Women 2019: 3%	Men 2019: 6%
		45 to 55	5%	13%
			5%	13%
			5%	12%
		35 to 45	7%	18%
			7%	17%
			7%	17%
		25 to 35	13%	27%
			14%	27%
			14%	27%
		<25	3%	6%
			3%	6%
			3%	7%

Legend:
- Women 2017 / Men 2017
- Women 2018 / Men 2018
- Women 2019 / Men 2019

The average age of employees on permanent contracts is 37.8, with an average length of service of 7.1 years (stable compared with 2018).

Female representation in the Group's workforce increased slightly, from 31.6% in 2018 to 32% in 2019, with women holding 29.5% of engineering, consulting and project management positions (up from 27.9% in 2018). It remains higher than the overall proportion of women in scientific careers (28%). Progress was made in France, India, the United Kingdom and Tunisia with a significant increase in the proportion of women recruited in these countries.

2.2.2. COMPENSATION

The Group's **compensation policy** is a management tool based on recognising each individual's contribution to the Group's performance, over and above the requirements of local legislation. It is based on the principle of fair treatment and supported by a system of personalised annual performance appraisals for all employees. Compensation offered is in line with local regulations and exceeds the minimum wage (where one exists) in countries in which the Group has a presence.

Principles governing the breakdown of and changes in compensation apply across the Group and are based on the following:

- fixed compensation: in keeping with the level of responsibility, consistent with the Group's Core Competency Reference Guide;
- variable compensation: to encourage individual and collective performance for some employees, notably managers, sales staff and experts;
- an international Group employee share ownership programme to give all employees a more meaningful stake in the company's performance.

2019 achievements

The ratios set out below are the fruit of a policy aimed at harmonising HR processes so as to promote fair treatment across all countries in which the Group operates:

- **ratio for the top 1% of high earners in the Group** (99.8% of the Group excluding interns, work-linked training students and acquisitions): **85.5% of employees** work in a country where the average of the top 1% of salaries is **less than 4.5 times the average salary in the country** (stable compared with 2018 despite the expansion in scope),
- **fairness ratios for the Chairman and the Chief Executive Officer** are detailed on pages 88, 89 and 95 of this Universal Registration Document.

Ratio of the average top 1% of salaries to the average annual salary	% (2019)*	% (2018)**
Under 4.5	85.5%	84%
4.5 ≤ x ≤ 5	14.4%	16%
Over 5	0.2%	0%

* 99.8% of the Group workforce (excluding Cassiopae Tunisia) excluding interns and acquisitions.
** 78% of the workforce (Benelux, France, India excluding Cassiopae, Italy, United Kingdom and Scandinavia) excluding interns and acquisitions.

2.2.3. WORKING CONDITIONS AND ORGANISATION

The **Group's policy** on the organisation of work schedules is designed to promote work/life balance. Part-time working is never obligatory and is always a matter of individual employee choice. Sopra Steria approves requests for part-time work whenever they are compatible with the requirements of the departments or projects concerned.

2019 achievements

- In 2019, 5.9% of Group employees were part-time (compared with 6.1% in 2018).
- **Findings of the Great Place to Work survey**: 82% of employees responding to the survey felt that "I can take leave when I consider it necessary".

3. Societal responsibility: engaging all our stakeholders to build a positive future for all

Sopra Steria is a preferred partner of large organisations, supporting them over the long term and helping them respond to the transformation challenges they face in a world undergoing unprecedented environmental and social changes. This entails developing relationships of trust and transparent dialogue with our stakeholders, seeking input into our commitments and associated policies, raising our clients' awareness of the impact of digital technology on their business and their own commitments, and playing a part in meeting the needs of vulnerable populations in regions where the Group operates.

Sopra Steria is a signatory of the United Nations Global Compact, in the "Global Compact Advanced" reporting category (top 8%). Through this commitment, Sopra Steria supports the Global Compact's 10 principles in the areas of human rights, international labour standards, the environment and anti-corruption.

Sopra Steria responds to the United Nations Sustainable Development Goals 1, 2, 3, 4, 6, 8, 9, 10, 11, 12, 13, 16 and 17 related to society.

3.1. Dialogue with stakeholders

Maintaining a high level of transparency and interaction with stakeholders

Because the kind of transformation needed to build a positive future for all has to be a collective endeavour, we are working with our staff, our customers, our partners, our suppliers and civil society to provide sustainable answers. We want to take responsible and ethical steps to make innovation work for as many people as possible and have a positive impact on society as a whole.

3.1.1 SUMMARY OF STAKEHOLDER DIALOGUE

Clients	Client surveys; frequent exchanges on Sopra Steria's contribution to helping clients meet their corporate responsibility challenges (meetings, questionnaires, third-party assessments, client surveys, etc.); co-construction initiatives with clients focused on innovation as well as social inclusion and environmental clauses relating to the services provided by Sopra Steria.
Employees	**Great Place to Work** survey; Group-wide campaigns raising awareness about corporate responsibility; coordination of networks of employee champions and officers; training of new employees. Employee involvement in programmes promoting diversity, access to employment for young people, the environment and community engagement.
Shareholders and investors	Reporting to shareholders via the Universal Registration Document, General Meetings, press releases and earnings presentations; dedicated communications for employee shareholders; communication with investors via the website and answers to specific questionnaires.
Partners	Joint innovation approach with major strategic partners in digital transformation. Development of cooperation and partnerships with startup.
Suppliers and subcontractors	Purchasing policy rolled out Group-wide: purchasing procedures, Group suppliers' charter, programme to assess suppliers and subcontractors led by recognized external organisations; compliance system.
Civil society	Partnerships and sponsorships with international and local NGOs in each country; foundations in France and India; working with local authorities, schools and universities in the various countries where the Group operates; active involvement in trade unions and professional associations, clubs, coalitions; contributions to working groups and think tanks. Academic chairs.
All stakeholders	Publication of an annual Corporate Responsibility Report audited by an independent third party; evaluation by non-financial organisations and analysts, with the publication of scores received; regular dissemination of information via the Group's website and social networks: Twitter, Facebook, LinkedIn, etc.

3.1.2 ADVISORY BOARD

The CR Advisory Board rounds out the Group's stakeholder dialogue mechanisms. The CR Advisory Board consists of external figures with no financial or business interests in the Group. Through their experience and expertise in key areas falling within the Group's corporate responsibility, these advisors provide independent and relevant insights challenging and driving improvement in the Group's approach and forging stronger dialogue with all stakeholders. An overview of the CR Advisory Board can be found in Section 1.1.3, "A corporate responsibility governance structure supporting the Group's priorities" of Chapter 4 on page 104.

3.1.3. CLIENT SATISFACTION

The primacy of customer service is one of Sopra Steria's core values and delivering customer satisfaction is a key priority. Combining added value with innovative high-performance services, the Group excels in guiding its clients through their transformation projects to help them make the most of digital technology.

Furthermore, to supplement arrangements put in place to regularly interact with clients, at the end of 2019 the Group launched a new worldwide survey asking clients to rate the quality of their relationship with the Group. This survey will be carried out annually.

3.2 Innovation and stategic partnerships

Drawing on innovation and strategic partnerships to support digital transformation

We are a trusted partner to our clients, bringing them the best technology to develop innovative solutions. Thanks to a network of leading experts, startups and major technology partners, we work with our clients to build solutions that meet their requirements for sustainable performance.

3.2.1 CO-DESIGN TO MOBILISE COLLECTIVE INTELLIGENCE

Developing a collaborative approach fosters creativity in the design of services, uses, processes, organisations and a shared vision or strategy. By involving business experts, end users and technical experts, this approach shortens the design phase, optimises processes and helps maximise access to digital technology.

3.2.2. SOPRA STERIA'S DIGILABS FOR THE DEVELOPMENT OF DIGITAL CO-INNOVATION

Digital co-innovation – a driver of value creation in the digital revolution – brings together Sopra Steria staff and clients to work on technologies like virtual reality, augmented reality, the internet of things, artificial intelligence, data science, blockchain, robotics, mobility and cybersecurity. This approach is supported by the Group's DigiLabs, spaces designed to foster the emergence of innovative solutions for clients. In 2019, Sopra Steria had 24 DigiLabs spread across the major geographic regions in which the Group operates.

3.2.3 NEXT: A SPACE DEDICATED TO A NEW CLIENT EXPERIENCE

NEXT, opened in May 2019, is a premium space dedicated to dialogue and joint development. We help our major clients untangle a situation, examine their options, explore new ideas and come up with responses that meet their expectations. NEXT also serves as a dedicated space for client and partner events where we can share our vision and convictions and boost the Group's image.

Located in premises in the heart of Paris measuring almost 1,000 square metres, the NEXT team helps organise high-impact client events designed to kick-start sustainable transformation. Feasibility studies, programme definition, business model definition, new product and service design – NEXT also puts together tailored events in response to our clients' key challenges.

In 2019, over 7,000 people attended 340 events.

3.2.4. ALLIANCES WITH STRATEGIC PARTNERS

To turn the potential of technologies into operational benefits for our clients in their specific environments and business sectors, Sopra Steria has entered into partnerships with market-leading vendors and technology players.

Based on close day-to-day relationships and a governance structure with its own dedicated management, coordinated at Group level by a Corporate Alliance Officer, these partnerships ensure that Sopra Steria staff have a high level of expertise in partner solutions and technologies. They also enable us to achieve optimal efficiency in project implementation through an approach characterised by industrialisation, co-innovation and R&D.

The Group's strategic partners are AWS, Axway, Dassault Systems, Google, IBM, Microsoft, Orange, Oracle, PEGA and Salesforce.

3.2.5. SOPRA STERIA VENTURES

Sopra Steria Ventures is a project aligned with the Group's core values of innovation and entrepreneurship aimed at:

- maximising customer satisfaction and perceived value;
- creating new sources of value and contributing to the performance of Sopra Steria's offerings;
- reinforcing our know-how and expertise in three areas (technology, human resources and talent, and organisation) in support of a responsible digital transformation, within an increasingly demanding "Innovation to Business to Consumer" value chain, while also speeding up value creation.

Mission

Technology serves as a gateway to infinite possibilities. As fascinating as this never-ending stream of innovations is, it also raises questions about the meaning of this race to novelty and change. There are many possible ways of responding to it.

At Sopra Steria, our mission is to guide our clients, partners and employees towards bold choices to build a positive future by putting digital technology to work in service of humanity. Beyond technology, we believe collective intelligence can contribute to a sustainable world. Together, we are building sustainable solutions with positive impacts that take full account of interactions between digital technology and society.

Priorities

- Identify and invest in highly targeted innovative solutions.
- Directly and indirectly invest in startups.
- Leverage the Group's solutions and businesses to create strong relationships.
- Speed up value creation for our clients.
- Continue to guide and serve clients as effectively as possible.

Fundamental principles

- Balanced relationships and partnerships with startups.
- Involvement of Group employees, strengthening our entrepreneurial DNA.
- Transforming businesses and ecosystems through innovation.
- Richness in diversity and the strength of collective intelligence.

Sopra Steria has thus developed working relationships with a number of startups, whether through partnerships, by involving them in projects or by directly or indirectly investing in their equity.

These working relationships relate to areas of expertise such as artificial intelligence and data science, blockchain, the cloud, digital interaction, X-Reality, digital IT (clean code, gaming, BPM), the IoT and automation, as well as emerging technologies.

The Group also partners with two investment funds:

- ACE Management in the Brienne III fund, focused on cybersecurity for vitally important operators and cyber defence;
- Truffle Capital in a fund dedicated to FinTechs and InsurTechs.

3.2.6 COMMITMENTS IN SUPPORT OF DIGITAL SOVEREIGNTY AND CYBERSECURITY

Digital sovereignty is a key issue for both government departments and economic agents. Everyone must work together closely to manage the data (from production, operation and measurement) on which governments and businesses alike depend for their autonomous decision-making.

Against this backdrop, and drawing on its expertise in digital transformation and cybersecurity, in 2019 Sopra Steria entered into an agreement with Sciences Po to create the "Digital, governance and sovereignty" academic chair.

The aim of this partnership is to encourage the chair's research and teaching work to redefine the concept of sovereignty, address shifts in sovereignty and identify new use cases amid a context of digital transformation. Thanks to Sopra Steria's support, Sciences Po's school of public affairs will provide academics, researchers, doctoral students and professionals with opportunities to think about new modes of governance and how sovereignty can adapt to this new environment.

Furthermore, as part of its overall commitment to digital sovereignty, Sopra Steria is partnering, alongside other major players in the digital sector and civil society, with the Cyber Campus France project, tasked by the French Government with creating a flagship French centre of excellence in cybersecurity. Cyber Campus France will, in particular, be able to draw on Sopra Steria's expertise in Toulouse, where it has a cybersecurity centre staffed by over 300 experts, the largest such centre serving the aerospace market. It will also be able to count on the Rennes centre, where 50 experts work for the Ministry of the Armed Forces in the area of cyber defence. The ultimate goal of Cyber Campus France will be to export French expertise and innovation to other countries. In this way, Sopra Steria's involvement in this project will contribute to the dissemination of French expertise across Europe.

3.3. Responsibility in digital

Raising our clients' awareness of the social impact of digital technology and their own sustainability challenges

Sopra Steria's corporate responsibility policy aims to involve all external and internal stakeholders in working for a more inclusive, sustainable and environmentally friendly world, and to ensure that the Group's value proposition takes into account the specific labour-related, environmental, ethical and social challenges facing its clients.

The Group's services and solutions help meet these challenges through digital technology and innovation.

Digital technology is now at the heart of efforts to address key labour-related, social and environmental challenges facing businesses, regions and countries. It can help improve citizens' quality of life, make cities more attractive through optimised mobility management, make services more accessible, reduce businesses' environmental footprint and develop a more socially responsible and inclusive economy.

As a major European player in digital transformation for large organisations, Sopra Steria plays an essential role in contributing to and providing input into work on the societal impact of digital technology. Sopra Steria contributes to a number of external think tanks and has put in place several internal working groups involving experts, consultants, operational managers and individuals with a stake in the Group's sustainable development, with the intention of incorporating the group's thinking into its value proposition.

3.3.1. DEVELOPING RESPONSIBLE DIGITAL INNOVATION THAT ENGAGES THE GROUP AND ITS STAKEHOLDERS

When it comes to digital transformation, the limits of technology and the realm of the impossible have long reined in possibilities and, at the same time, the potential for many types of improper use or misuse. Now that these impediments are being eliminated and digital technologies have become deeply embedded in all of our economic and social activities, it seems inconceivable not to closely examine our practices, our projects and, ultimately, our business itself.

This exercise naturally takes into consideration corporate responsibility issues relating to the workforce, the environment and society at large, but it must also address, in a more general manner, questions concerning ethics. It is essential to pave the way towards a digital ethics. The latter may be understood as the set of principles and values applying to the design, creation, sale, marketing, use and integration of digital technologies together with the management of all their knock-on effects, as well as their components or the elements necessary to provide the related services effectively and efficiently.

Rather than an abstract philosophical approach removed from everyday concerns and leaving aside the conditions for action that emerge as obstacles, the idea is to work to promote specific values to underpin digital transformation and ensure that it is designed and implemented in service of humanity.

Respect for privacy and free will, protection of personal data and technical measures controlling access to digital creations, assessment and mitigation of social and environmental impacts, promotion of diversity and accessibility, reversibility and remediation capabilities – these are some of the fundamental elements that we wish to promote as principles for action.

The Sopra Steria Next consulting teams have launched a major project to change the way we look at things, work and create. Above all, this imperative represents a collective challenge for the common good of our clients and our employees.

3.3.2 HELP CLIENTS DEAL WITH THE IMPACT OF DIGITAL TECHNOLOGY ON THEIR OWN SUSTAINABILITY CHALLENGES

The aim is to provide the Group's clients with high added-value advice and expertise to help them fully address labour-related, environmental and social challenges into their core business transformation projects, including in particular those relating to digital technology, the environment and people:

- by developing their business increasingly in compliance, at consolidated level, with regulatory requirements relating to sustainability;
- by defining transformation strategies whose impact also contributes to sustainable development and performance for their employees, partners, clients and shareholders;
- by developing digital strategies and digital sustainability across our value chain.

This value proposition taking into account workforce-related, environmental, social and ethical issues is intended to help Sopra Steria's clients identify global, systemic responses to their key business challenges, with a clear and concrete view of their impacts on their ecosystem.

3.3.3. CONTINUED SUPPORT FOR THE DIGITAL HUMANISM DEPARTMENT AT THE COLLÈGE DES BERNARDINS

The Group has for the past four years been working with Collège des Bernardins, a key centre for gatherings and discussion, as part of its "Digital Humanism" department, dedicated to the societal aspects of digital technology. Thanks to its experience as a key economic player in the digital sector, the Group is able to enrich thinking and work with researchers, scientists, experts, anthropologists and major companies to share a fresh perspective on this crucial issue for the future of humankind.

3.4. Responsible purchasing

Aligning the supply chain with corporate responsibility priorities

3.4.1. RESPONSIBLE PURCHASING POLICY

According to the Group's risk mapping exercise and the duty of care, risks associated with the supply chain do not constitute a key risk factor for Sopra Steria.

The Group's responsible purchasing programme, set up several years ago, is aimed at aligning its supply chain with the Group's priorities. This programme helps to optimise the purchasing process, incorporate new regulatory requirements, in particular those resulting from the duty of care and Sapin 2 laws in France (see Section 5.6 of Chapter 4, "Duty of care and vigilance plan", page 131), and manage risks arising from the supply chain.

All Group entities follow a responsible purchasing approach and are now subject to Group purchasing procedures under which all purchases must take corporate responsibility criteria into account.

In particular, it meets objectives in the following areas:

Engagement
- Purchasing departments by relying on procedures harmonised across the Group.
- Sopra Steria's suppliers and subcontractors by sharing the Group suppliers' charter.

Strengthened capacities
- Tighten management of compliance among the Group's suppliers and subcontractors.
- Improved coordination and management of the Group's sustainability performance.
- More extensive assessment of the Group's main suppliers and subcontractors to make sure they meet the corporate responsibility standards set by Sopra Steria.

Continuation of efforts
- Socially responsible purchasing policy in support of diversity.
- The environmentally friendly purchasing policy.

3.4.2 2019 KEY ACHIEVEMENTS AND RESULTS

- Rollout and implementation of new purchasing procedures, including in particular supplier and subcontractor assessments and inspections across the entire Group.
- Dissemination of a new suppliers' and subcontractors' charter across the entire Group and rollout of systems to manage supplier and subcontractor compliance.
- In France, 332 charters were signed, corresponding to 82% of the 406 targeted suppliers having received the charter. In the United Kingdom, 447 targeted suppliers signed the new charter, representing 43% of total expenditure.
- EcoVadis corporate responsibility assessments (social issues, business ethics, environment, supply chain) widened to cover more suppliers and subcontractors with the launch of a new campaign in 2019.

At 22 January 2020, 247 targeted suppliers (either strategic suppliers or those identified in connection with new tender offers) were assessed via EcoVadis (254 at 6 February 2020), out of a total of 411 suppliers having received requests for assessment since this system was put in place in 2015. The response rate for the EcoVadis assessment exceeded 60% and suppliers having completed a follow-up assessment improved their overall score by 2.2 percentage points on average.

The average score for Sopra Steria suppliers having completed the assessment was 53.8 out of 100 (whereas the average score for all EcoVadis assessments was 42.4 out of 100).

For suppliers with a score less than or equal to 24 out of 100 (as an overall score and/or the score for the "Business ethics" module), an alert is triggered by EcoVadis. The supplier is then contacted by Sopra Steria's Purchasing Department to put in place the necessary corrective actions and undergo a new EcoVadis assessment within a period of three months. Since the rollout of the EcoVadis platform for Sopra Steria suppliers, only one has received a score of 24 out of 100. Following the implementation of an improvement plan, this supplier was reassessed and received a new score of 34 out of 100.

Sopra Steria's expectations for suppliers, as outlined in its responsible purchasing policy, call for an overall EcoVadis score greater than or equal to 45 out of 100. If a supplier's overall score and/or the score for any of the four modules (environment, social issues, business ethics, supply chain) is less than 40 out of 100, its performance is considered as inconsistent with the expectations outlined in the responsible purchasing policy. In this case, the supplier is asked to refer to the areas for improvement identified in the course of its assessment to put in place a corrective action plan.

■ Implementation of new indicators to assess suppliers and subcontractors based on the Group's commitments relating to the SBTi (Science Based Targets initiative): reduction of greenhouse gas emissions from the Group's supply chain(see "Environmental responsibility", Section 4.4.6., page 126).

Ethical and inclusive purchasing

■ In France, the Group uses services provided by sheltered workshops and other organisations that specifically employ people with disabilities.

■ In the United Kingdom, several initiatives are in place to open up access to the Group's supply chain for SMEs as well as women- and diverse-owned businesses.

Environmentally friendly purchasing

■ Purchases of renewable electricity directly from suppliers, purchases of International Renewable Energy Certificates (I-RECs) and Guarantees of Origin (GOs): see Section 4.4.3., "Increasing the proportion of renewable energies", page 123.

■ Purchases of certified eco-responsible paper: see Section 7.2., "Summary of environmental indicators", page 146.

3.4.3. MAIN OBJECTIVES FOR 2020

■ 100% of targeted suppliers (1,165 suppliers), representing 72% of total purchases, assessed via EcoVadis, with an expected response rate of at least 60%.

■ Improvement in the average score of suppliers not in line with Sopra Steria's expectations, assessed in 2019 via EcoVadis.

3.5. Community and patronage

COMMITTING THE COMPANY TO AN ETHICAL AND INCLUSIVE DIGITAL SOCIETY

Digital technologies, when used responsibly, can be a source of social innovation for the benefit of the largest possible number of people.

It is in this spirit that Sopra Steria has pursued, for many years, an extensive, solidarity-based programme in aid of disadvantaged populations, to give them access to education, employment and the benefits of digital technologies, as well as safe drinking water and improved sanitation facilities.

As a leading digital player with operations in many countries, Sopra Steria thus works to implement solidarity-based actions having a positive and lasting impact on society. These actions aim to promote social and professional integration for the most vulnerable and those living on the margins of society and to protect the environment. Playing a key role in the Group's programme of actions, the Sopra Steria – Institut de France Foundation and all Group entities give shape to these commitments through projects bringing together the Group's employees and civil society stakeholders. The Foundation has been engaged in a remarkable collective adventure over the last 19 years, shared by the teams who

manage its initiatives on a daily basis, along with all volunteers taking part in its projects.

3.5.1. KEY FIGURES

Collective engagement and actions to achieve a lasting impact:

■ 161 projects supported;

■ >1,500 volunteers;

■ 39 participating clients/partners;

■ 218 organisations supported;

■ 50,000 children assisted in 49 schools in India;

■ 64 students in India awarded scholarships for higher education through the Sopra Steria Scholarships Programme.

3.5.2. A PROACTIVE POLICY INVOLVING THE ENTIRE ORGANISATION, A CROSS SECTION OF EMPLOYEES AND CIVIL SOCIETY

To implement this policy, which involves the participation of 1,200 employees in all countries, Sopra Steria is supported by:

■ a network of 25 country representatives, led and coordinated at Group level, who implement the actions decided;

■ two foundations in France and India, the latter coordinating a large educational programme along with a range of other solidarity actions;

■ sponsorships and partnerships developed with public interest organisations;

■ local solidarity initiatives and fundraising events in several countries in which employees proactively take part, thus complementing the initiatives put in place under the Group's policy;

■ Community Day, a major solidarity campaign run by the Group each year, with the aim of making employees aware of the various actions being carried out to support local communities in the countries where the Group operates while raising the profile of volunteering. In 2019, the Group's many volunteers and heads of country entities took part, supporting the Group's efforts to ensure access to digital technnlogy for all and making the event a valuable opportunity for sharing and discussion.

3.5.3. A FRAMEWORK FOR GROUP ACTION TO PROMOTE INITIATIVES WITH A STRONG AND LASTING IMPACT

Providing access to quality education and improving employability

In India, the education programme, which has been running for a number of years, aims to combat poverty in a country with high levels of inequality. This programme is primarily aimed at children from poor rural areas, in particular girls, who can benefit from schools located close to the company's sites.

■ Over 50,000 children and young people, in 49 schools from primary to secondary level, benefit from this comprehensive educational programme and are supported in their schooling by hundreds of Sopra Steria volunteers.

■ To supplement access to education for young children, Sopra Steria has developed a major scholarship programme in India to fund students from schools supported by the Group. In 2019, employees and entities in many of the countries where the Group operates [1] lent support to the Sopra Steria Scholarships Programme, enabling many Indian students – most of them girls – to continue in higher education. Since 2006, a total of 646 students have received assistance from the Sopra Steria Scholarships Programme, including 104 in 2019.

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(1) Belgium, France, Germany, India, Italy, Scandinavia, Spain, Switzerland, United Kingdom.

In other countries where the Group operates, various projects have been put in place, including:

- support for young job seekers in France with Nos Quartiers ont du Talent;
- evening classes for young students at risk of early school leaving given by Sopra Steria volunteers in association with Foundation Balia in Spain;
- raising awareness of digital professions for young students from disadvantaged neighbourhoods in Morocco;
- other local employability initiatives supplementing these actions to promote access to higher education and job opportunities, with the help of employee volunteers.

Digital inclusion

To make digital technology accessible to all, numerous local initiatives aimed at vulnerable populations were launched with clients, partners and employees.

- In 2019 in France, the Sopra Steria-Institut de France Foundation supported 16 digital humanitarian projects with a social or environmental dimension sponsored by employees (see insets on Adiléos and 6ᵉ Sens). In 2019, the Foundation launched the Prix Entreprendre pour Demain to recognise talented students and young entrepreneurs, taking as its theme "Responsible digital transformation for the good of the planet". Winners will receive operational guidance in developing their ideas and launching their projects, provided by mentors from the Group.
- In Norway, Sopra Steria continues its support for social entrepreneurship, with employees donating their skills to provide computing classes for recent female immigrants. Employee volunteers also delivered coding lessons to hospitalised children in 2019. In addition, the Group lent its support to a major awareness programme targeting both parents and children to encourage the right behaviours online, with the participation of employees.
- In Italy, an application was developed to help young adults with autism develop independent-living skills, with the help of employee volunteers.

Adiléos, social facilitator

Founded by a Sopra Steria employee, the non-profit organisation Adiléos provides a range of digital services to marginalised or disadvantaged people and their social workers. Among these services is a software solution allowing homeless people to store their documents and personal information. The Sopra Steria-Institut de France Foundation, which has backed Adiléos since 2014, is lending its support for a new mobile application under development to facilitate relations between recipients and providers of aid, thanks to Sopra Steria volunteers. As a partner of the French health ministry, Adiléos' solutions have already been adopted by some 60 social assistance structures and municipalities, with further developments in the pipeline.

6ᵉ Sens, seeing through touch

Selected as a winner of the Prix Entreprendre pour Demain by the Sopra Steria-Institut de France Foundation, the 6ᵉ Sens project offers the blind a solution able to leverage their heightened sense of touch to aid in navigating their environment. The solution allows the blind to become more aware of shapes and their distances by way of their skin sensory receptors. The aim is to increase autonomy for these individuals in their everyday activities. Mentored by a team of Sopra Steria volunteers, the project team is developing its prototype under the auspices of the social enterprise Artha.

Tech for Good

A new Tech for Good programme was launched in the UK in 2019 to support entrepreneurship and innovation initiatives in the public interest, with the participation of Sopra Steria employees. Partnerships have been forged with Business in the Community, Elatt and Micro-Tyco Innovate. By way of example, to take up the six digital challenges addressed by Elatt, an education non-profit helping marginalised people, Sopra Steria organised a hackathon bringing together dozens of young graduates and company volunteers. Students served by the non-profit visited one of our DigiLabs and took part in demonstrations of new technologies, such as the HololLens, and were given coding lessons on Raspberry Pi computers.

Water rights

Sopra Steria has for several years been supporting international organisations working to protect the oceans through financial sponsorship and skills. The main organisations supported are:

- 1001fontaines, a French NGO, to provide access to safe drinking water around the world;
- Join for Water, a Belgian NGO focusing on water rights, for its initiative to develop access to safe drinking water and improve sanitation facilities in the Mpanga catchment in Uganda;
- Planet Water Foundation in India, where its AquaTower solution, a filtration system that removes harmful particles, bacteria and viruses from drinking water, has been installed at several schools and other solutions to provide access to safe drinking water are currently being developed;
- Green Cross, for its presentations to various bodies concerning the protection of the oceans, notably at COP25 in Madrid.

3.6. Regional impact

Reinforcing the Group's positive regional impact

Sopra Steria has a significant impact on regions and communities, given its size, its local roots and the number of new staff joining the Group each year. It is a leading employer, with over 46,000 employees across 25 countries, particularly in Europe. It is also a major recruiter in regions where the Group has operations, with around 11,000 new recruits taken on across the Group in 2019 (see Section 2.1.1., "Attracting and retaining more talent", in Chapter 4., page 108).

As a committed corporate citizen involving its entire ecosystem, Sopra Steria ensures that, in developing its business, it takes into account economic, workforce-related, environmental and social challenges facing regions in which the Group operates, in particular among struggling or highly vulnerable populations.

4. Environmental responsibility: innovating to address climate change and protecting the environment along our value chain

A bold ambition served by an innovative Group policy

Sopra Steria is a leading player in digital transformation for major companies and organisations. The Group's activities can thus involve a focus on reducing its clients' environmental footprint. With this in mind, the Group has been working for several years to reduce the environmental footprint of its own business activities and to involve its entire value chain in a shared continuous improvement process.

Now recognised as one of the world's leading companies involved in combating climate change, Sopra Steria continues to develop actively its environmental strategy, in particular by contributing to international initiatives aimed at reducing climate risk and by supporting the transition to an economy with net-zero greenhouse gas emissions.

To coordinate its strategy, the Group relies on commitments made together with major international organisations, enabling it to set ambitious medium- and long-term targets.

This environmental strategy is supported by a policy broken down into seven priority actions:

1. Strengthening the Environmental Management System (EMS) that provides a framework for the Group's policy;
2. Optimising the resources consumed by its operations;
3. Increasing the proportion of renewable energies to cover its electricity consumption;
4. Reducing greenhouse gas emissions arising from offices, data centres and business travel;
5. Contributing to the circular economy by optimising waste management, notably for waste electrical and electronic equipment (WEEE);
6. Ensuring the involvement and contribution of the entire value chain (employees, clients, suppliers, partners, etc.) in the continuous improvement process;
7. Embedding sustainability into the value proposition (digital sustainability, impact of solutions and services on the environment).

To strengthen its policy and the associated continuous improvement process, Sopra Steria has chosen to work with top-tier international organisations whose aim is to involve businesses, states, NGOs and civil society in action to prevent climate change.

4.1. Major commitments defined with leading global organisations

- **Global Compact and Sustainable Development Goals:** Sopra Steria is a signatory of the United Nations Global Compact, in the "Global Compact Advanced" reporting category (top 8%). Under this commitment, Sopra Steria supports the Global Compact's ten principles, including in particular the principle of environmental protection.

Sopra Steria supports United Nations Sustainable Development Goals 4, 6, 7, 8, 9, 11, 12, 13, 14, 15 and 17 related to the environment.

- **From COP21 in Paris to COP25 in Madrid:** Since the Paris Agreement, Sopra Steria has stepped up its commitment to action on climate change. Sopra Steria made important contributions to two events at COP25 in Madrid:

  - **participation in the High-Level Meeting on Climate Change convened by the UN Global Compact, the UN Environment Programme and the secretariat of the UN Framework Convention on Climate Change (UNFCCC):** As the first digital services company to align its targets with efforts to limit the global temperature rise to 1.5°C, as validated by the SBTi, Sopra Steria was invited to take part in discussions on this subject, alongside other business leaders having undertaken commitments to act for the climate,

  - **organisation of a conference entitled "Facing natural resource scarcity – keys for action":** In association with the NGO Green Cross, Sopra Steria organised a meeting for journalists and other opinion leaders;

- **New validation by the Science Based Targets initiative (SBTi):** In response to the call from the UN, following the release of the 2018 IPCC report, to limit the global temperature rise to 1.5°C, Sopra Steria revised its long-term targets in line with this new goal and received an official validation from the SBTi for the updated targets. These targets include the reduction in the Group's absolute greenhouse gas emissions (Scopes 1, 2 and 3), the reduction of its emissions per employee and the assurance that most of the Group's suppliers have set greenhouse gas emission reduction targets.

- **Transparency of reporting with the TCFD-CDSB:** The Group continues to improve its reporting in accordance with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) and the Climate Disclosure Standards Board (CDSB) in order to fully disclose the results of its continuous improvement process.

- **Contribution to the European Peer Learning Group on Climate in Berlin:** At the invitation of the UN Global Compact, the Group delivered a presentation on its experience in this area, under the title "How to use scientific models to set greenhouse gas emission reduction targets", to representatives of other leading European companies.

In fulfilment of its SBTi commitment to reducing its greenhouse gas emissions, Sopra Steria has set itself the following goals:

- continuing its renewable energy policy to cover all of its electricity consumption;

- expanding the internal shadow carbon price policy to all Group countries;

- maintaining the carbon-neutral programme (for business travel, offices and data centres);

- developing digital sustainability and contributing to an economy with net-zero greenhouse gas emissions by mobilising actors along the entire value chain.

4.2. Environmental challenges: Opportunities for the Group

Issues relating to the environment and the fight against climate change have been analysed for Sopra Steria; no key environmental risk has been identified according to the results of the Group's risk mapping exercise.

Some of the Group's environmental impacts, known by the TCFD as **"risks associated with the transition to an economy net-zero in GHG emissions",** are identified but not considered key risks at Group level. More specifically, these risks, known as **"transition risks",** as defined by the TCFD, are political, regulatory or reputational in nature (significant increase in fuel prices, more stringent requirements to disclose non-financial information, increased stakeholder expectations in relation to these changes). As regards reporting, Sopra Steria continues to fine-tune its data collection processes so as to be able to produce highly transparent and reliable regulatory reporting.

Based on the naming conventions used by the TCFD, the most significant impacts or **"physical risks"** to Sopra Steria mainly relate to the risks of heavy flooding, air pollution caused by rising temperatures, and seismic risk in some parts of the world. Sopra Steria's business continuity plans are designed to enable the Group to anticipate and manage these specific risks (see Section 1.3.2., "Risk related to operational activities", pages 40 to 43 and the section entitled "Unavailability of IT services and infrastructures and/or interruption of activities at sites" of Chapter 2., page 43).

These issues are reviewed and discussed with the Internal Control and Risk Management Department and presented annually to the Board's Nomination, Governance, Ethics and Corporate Responsibility Committee as part of an annual corporate responsibility update.

To address the challenges faced by its clients relating to responsible digital transformation, Sopra Steria has established working groups devoted to digital sustainability and digital ethics.

Sopra Steria is pursuing **business opportunities** arising from climate change, supported by innovative solutions developed by the Group:

- measure the impact of proposed solutions in light of the environmental challenges facing its clients;

- raising its clients' awareness of challenges relating to the environmental impact of going digital and supporting their efforts in this area.

These issues and opportunities are managed at Group level by the CR&SD Department via the Group Environmental Sustainability Committee (GESC) and the Group CR&SD Committee, and at country level via environment correspondents (known as Sustainability leaders) and heads of Real Estate and Internal Audit. At client project level, issues and opportunities are managed by client-facing departments, the Industrial Department and operational departments.

4.3. A Group recognised for its environmental commitment and action

The Group's high level of commitment and the results of its environmental policy now enjoy international recognition, making Sopra Steria one of the leading companies in this area.

- **SBTi:** Sopra Steria was the first digital services company to align its greenhouse gas emission reduction targets with efforts to limit the global temperature rise to 1.5°C, as validated by the SBTi.

- **CDP Climate Change – A List:** For the third year running, Sopra Steria achieved the highest performance score of "A", and once again feature on the A List of **CDP Climate Change**. This distinction recognises the Group's commitment to combating climate change, as well as the transparency and relevance of its programme of initiatives.

- **CDP Supplier Engagement Rating of A-:** Sopra Steria also takes part in the assessment process under the CDP Supplier Engagement Rating programme.

- **EcoVadis – Excellent on the environmental component:** Sopra Steria achieved an **EcoVadis** score of 90 out of 100 for its environmental programme, marking it out as an **excellent** performer in the environmental area.

In 2019, in recognition of its environmental or environmental, social and governance (ESG) performance, the Group was included in the following indices:

- Euronext® CDP Environment France EW;

- Euronext® CDP Environment ESG France EW;

- Euronext® CDP Environment France Ex Oil & Gas EW.

4.4. Targets and key achievements

The environmental policy, presented in the introduction to this section and further developed in the table below, is designed to enable the Group to respond to the risks and issues referred to in Section 4.2., "Environmental challenges: Opportunities for the Group" page 121.

The scope of performance indicators is set out in Section 1.3., "Overview of reporting scope", in Chapter 4., page 105.

For reference, definitions of Scopes 1, 2 & 3 are given in the diagram below.

SCOPE 1: DIRECT GHG EMISSIONS

Fossil fuel energy consumption by offices
Fugitive emissions by offices and on-site data centres

SCOPE 2: INDIRECT GHG EMISSIONS

Electricity, heating or cooling consumption
by offices and on-site data centres

SCOPE 3: OTHER INDIRECT GHG EMISSIONS

Electricity, heating or cooling consumption
by off-site data centres
Business travel

4.4.1. ROLL OUT AN ENVIRONMENTAL MANAGEMENT SYSTEM (EMS) TO SUPPORT THE GROUP'S POLICY

TARGET: Harmonise the Group's environmental practices by establishing a framework within which local initiatives are implemented.

Key achievements	Key Performance Indicators and other performance indicators
■ Management of risks and opportunities within the Group (by the GESC, CR&SD Committee and Audit Committee) to meet TCFD [1]/CDSB [2] recommendations on the physical and decision-related information disclosures linked to climate issues. ■ Implemented ISO 14001:2015 certification in accordance with client needs ■ Since 2015: Annual ISAE 3000 audit of Scope 1, 2 & 3 emissions	ISO 14001 certification: 2015 certification active in Denmark, France, Germany, India, Norway, Poland, Spain, Sweden and the United Kingdom, and planned for Belgium and Luxembourg in 2020. In total, 11 out of 23 countries have offices with active ISO 14001 certification

(1) TCFD: Task Force on Climate-related Financial Disclosures.
(2) CDSB: Climate Disclosure Standards Board.

4.4.2. CONTROL RESOURCE CONSUMPTION

TARGET: Reduce per-employee consumption of resources (all forms of energy, water, paper)

		Key Performance Indicators and other performance indicators			
Key achievements		**2019**	**2018**	**2017**	**2016**
■ **Energy:** New sites meet the latest environmental standards (BREEAM, HQE, LEED); new IT equipment is environmentally certified (Energy Star® 7.0, EPEAT® Gold); collaborative IT tools have been implemented limiting sending of large emails and documents; new data centres have efficient PUE (Power Usage Effectiveness) ratings (e.g. Oslo Digiplex and Oslo Rata in Norway, rated 1.1 and 1.2 respectively).	**Energy** (MWh/employee)	2.2	2.3	2.4	2.6
■ **Water:** Installation of systems to recover rainwater and optimise consumption of sanitary water (in India)	**Water** (cu. metre/employee)	5.5	5.2	6	N/A
■ **Paper:** Optimised printing methods and awareness campaigns to cut back on printing; purchases of environmentally certified paper.	**Quantity of paper purchased** (kg per employee)	2.4	2.5	3	N/A
		(Groupe SAB, Sopra Financial Technology GmbH and joint ventures excluded in 2019; Cassiopae and joint ventures excluded in 2018)			

4.4.3. INCREASE THE PROPORTION OF RENEWABLES

TARGET: Cover 85% of the Group's electricity consumption (offices and on-site data centres) from renewable sources by 2020.

RESULT AT END-2019: Target exceeded, with 90% obtained.

		Key Performance Indicators and other performance indicators				
Key achievements		**2019**	**2018**	**2017**	**2016**	**2015** *(baseline year)*
Purchase of renewable energy directly from power suppliers at certain sites or data centres in Belgium, Denmark, Germany, Luxembourg, Norway, Sweden, Switzerland and the United Kingdom. ■ Obtain Guarantees of Origin in Spain, France, Norway, Poland, the United Kingdom and Italy. ■ I-RECs in Algeria, Cameroon, Côte d'Ivoire, Gabon, India, Morocco and Tunisia. ■ Cogeneration at Meudon in France.	**Proportion of electricity consumption for offices and on-site data centres from renewable sources**	90%	78%	76%	69%	20.40%

<div>

TARGET FOR 2040 (BASELINE 2015): 85% reduction in GHG emissions per employee

RESULT OBTAINED IN 2019 (BASELINE 2015): 36.7% reduction in GHG emissions per employee

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4.4.4. REDUCE GHG EMISSIONS RESULTING FROM OUR OPERATIONS [3]

TARGETS:

- Reduce absolute greenhouse gas (GHG) emissions by 42% by 2025 (Scopes 1 & 2, on-site offices and data centres, baseline 2015); target validated by the SBTi.
- Reduce absolute greenhouse gas (GHG) emissions by 21% by 2025 (Scope 3, off-site data centres and business travel, baseline 2015); target validated by the SBTi.
- Reduce GHG emissions per employee by 85% by 2040 (Scopes 1, 2 & 3; business travel, offices and on-site and off-site data centres; baseline year: 2015). Target validated by SBTi.
- Implement an internal shadow carbon price in the Group's main geographies by 2025.
- Ensure that the Group's business travel, office space and data centres are carbon neutral.

Key Actions and achievements	Key Performance Indicators and other performance indicators				
		2019	**2018**	**2017**	**2016**
- Realignment of the emission-reduction targets in line with the objective of limiting the rise of average global temperature to a maximum of 1.5°C (targets approved by the SBTi) - 42% reduction in absolute greenhouse gas (GHG) emissions by 2025 (Scopes 1 & 2, on-site offices and data centres, baseline 2015) - 85% reduction in GHG emissions per employee by 2040 (Scopes 1, 2 & 3; business travel, offices and on-site and off-site data centres; baseline year: 2015).	**Absolute GHG emissions (Scopes 1 & 2; baseline year: 2015)** *(fugitive emissions not included in 2015 and 2016; joint venture sites not included in 2015; excludes Groupe SAB and Sopra Financial Technology GmbH)*	-64.2%	-55.6%	-45.8%	-40.7%
	GHG emissions per employee (Scopes 1, 2 & 3; baseline year: 2015) *(fugitive emissions not included in 2015 and 2016; hotels and joint venture sites not included in 2015; excludes Groupe SAB and Sopra Financial Technology GmbH)*	-36.7%	-29.1%	-20.0%	-13.6%

- **Business travel**
  • Campaigns to raise awareness of low-carbon means of transport and digital communication systems
  • New models of hybrid vehicle incorporated into corporate fleet
  • Monitoring of remote communication system utilisation rates
	27.5% reduction in GHG emissions per employee from business travel relative to 2015 (hotels included in 2019 and 2015; joint ventures excluded in 2015 but included in 2019; excludes Groupe SAB and Sopra Financial Technology GmbH).[4]				

- **Energy** Optimised energy consumption and use of renewable energy at offices and on-site data centres.	- 15.4% reduction in energy consumption per employee relative to 2016 - 72.3% reduction in GHG emissions per employee arising from offices and on-site data centres relative to 2015 (including fugitive emissions in 2019, excluding fugitive emissions in 2015)				
- **Fugitive emissions** Gradual replacement of some air conditioning equipment	18.7% increase in GHG emissions linked to fugitive emissions relative to 2017, [5] due in particular to more substantial coolant leaks in 2019				

Key Actions and achievements	Key Performance Indicators and other performance indicators				
		2019	2018	2017	2016
■ **Internal shadow carbon price** Introduced an internal carbon price for business travel in Spain. By 2020, the Group's target is to expand the shadow carbon price system to cover all its geographies.	**Number of countries with an internal shadow carbon price (Business travel)**	14 countries (+ Austria, Belgium, Denmark, Germany, India, Italy, Luxembourg, Norway, Poland, Sweden, Switzerland)	3 countries (+ Spain)	2 countries (+ France)	1 country (UK)
■ **Carbon neutral programme** Renewed the CarbonNeutral® certification programme to offset the Group's residual emissions	CarbonNeutral® certification for all Group business travel, office space and data centres since 2015				

(3) CDSB: Climate Disclosure Standards Board. For energy, emissions are calculated using the market-based method, under which a nil emissions factor is applied if the energy source is "green"; otherwise, "residual mix" emissions factors issued by the Association of Issuing Bodies or "location-based" emissions factors issued by the International Energy Agency are applied. For business travel, the emissions factors used are those arising from the GHG Protocol.

(4) For reference, GHG emissions from business travel totalled 32,005 tCO2e CO in 2015 (excluding hotels).

(5) Refrigerant gases covered by the Montreal Protocol are not included in the scope of fugitive emissions.

4.4.5. PROMOTE THE CIRCULAR ECONOMY

TARGET: Extend on-site selective sorting, increase waste recovery, maximise the life cycle of resources and prevent pollution.

Key achievements	Key Performance Indicators and other performance indicators				
		2019	2018	2017	2016
■ WEEE[6] Maximisation of the life cycle of electronic equipment: resale or donation of equipment no longer required; repair of hardware where appropriate; dismantling of end-of-life equipment for recovery of materials. WEEE in India decreased in 2019 following significant equipment changes in 2018.	**WEEE** (kg per employee)	1.9	2.2	2.1	2.1
	Proportion of WEEE given a second life	97% (Including joint ventures but excluding Groupe SAB and Sopra Financial Technology GmbH)	95% (Including joint ventures but excluding Beamap and Cassiopae)	96% (Including joint ventures)	98%
■ Paper and cardboard Recycling of virtually all paper and cardboard collected Measurement method revised in Germany in 2019.	**Paper and cardboard waste** (kg per employee)	9.4	10.5	10.8	10.0
	Proportion of paper and cardboard waste recycled	96%	97%	97%	92%

(6) WEEE: Waste Electrical and Electronic Equipment.

4

CORPORATE RESPONSIBILITY
Environmental responsibility: innovating to address climate change and protecting the environment along our value chain

4.4.6. INVOLVE OUR ENTIRE VALUE CHAIN

TARGETS:

- Work with major suppliers committed to the environment: Ensure that the Group's leading suppliers, accounting for at least 70% of supply chain emissions, control their GHG emissions, and that 90% of them have set GHG emissions reduction targets by 2025 (target validated by SBTi).

- Pursue a responsible purchasing policy favouring products and services with a low environmental impact.

- Raise awareness among our stakeholders and contribute to the work of opinion leaders and influencers.

- Develop employee engagement across the Group.

Key achievements	Key Performance Indicators and other performance indicators			
	2019	**2018**	**2017**	**2016**

- Analysis of the **residual environmental impact of the Group's purchases** (not included previously in Scopes 1, 2 and 3)
  • On the basis of data for France (which represents 43.8% of Group data), a limited assurance approach was applied to scale up this data proportionally, arriving at an estimate for the **total GHG emissions linked to the Group's purchases** of 221,311 tCO₂e using the ADEME method. Our aim is to extend this limited assurance approach to the whole of the Group by 2025. Continuation and adaptation of the EcoVadis supplier assessment programme (Section 3.4., "Responsible purchasing", page 117).
  • Development of an indicator to identify the main suppliers accounting for at least 70% of supply chain emissions in France and having committed to a GHG emission reduction target.
 	
tCO₂e/€m of Group expenditure
	179 (ADEME method, based on purchasing data for France and scaled up proportionally)	**196** (ADEME method, based on purchasing data for France and scaled up proportionally)	**174** (Quantis method)	N/A

Environmental footprint of Group expenditure *(tCO₂e)*	**221,311** (ADEME method + pro rata)	**246,447** (ADEME method + pro rata)	**198,000** (Quantis method)	N/A

- **Responsible purchasing:**
  • Rolled out new purchasing rules incorporating environmental criteria Group-wide
  • Group suppliers' charter including new selection criteria

- **Stakeholders:**
  • Disclosure of the Group's commitments to its internal and external stakeholders: Corporate Responsibility Report, client and rating agency assessments, commitment to the Global Compact, CDP Climate Change and Supplier reporting, etc.
  • Contributions to a variety of sector-specific organisations: Syntec Numérique (Digital and Environment working group) in France, the British Computer Society (BCS) in the United Kingdom, Agoria in Belgium.
  • Attendance at gatherings of French companies that have signed up for the Science Based Targets initiative, jointly organised by WWF and SBTi in Paris

- **Employees:**
  • International awareness campaigns:
  – Printing policy, recycling, World Water Day, World Environment Day, Earth Hour, Earth Day and European Sustainable Development Week.
  • Group campaign of improvement initiatives
  – Employee networks (Green Light in France, Green Champions in the United Kingdom and India).
  – Partnership in France for the "Grand Cause Nationale pour l'Environnement", an operation coordinated by Make.org to build bridges with civil society over a three-year period and implement concrete actions.

4.4.7. INCORPORATE SUSTAINABLE DEVELOPMENT PRIORITIES INTO THE VALUE PROPOSITION

Responsible digital technology represents a major driver of economic and social development provided that it factors in the direct and indirect environmental effects over its life cycle – including from infrastructure, developments, use and end-of-life arrangements for equipment.

It is thus crucial to support the development of digital technology for the benefit of society by adopting a digital sustainability-based approach that accommodates the Green IT and IT for Green IT dimensions.

Sopra Steria, a key player leading the digital transformation in Europe, supports its customers' major digital transformation projects by paying close attention to sustainable development priorities in the development of its solutions and services.

For the Group, this involves:

- measuring the impact of solutions and services delivered to its clients against the environmental challenges they face;

- raising its clients' awareness of the challenges of Sustainable Development and the environmental impact of going digital.

Sopra Steria applies three principles rooted in the concept of digital sustainability when carrying out its projects:

- CarbonNeutral® project teams: minimising the environmental footprint of each Sopra Steria project team and its equipment, in line with the carbon neutrality target adopted for all of the Group's business travel, offices and data centres;

- Green IT: analysing and investigating the new uses requested in relation to the value provided, applying eco-design principles for development tasks, environmental testing of projects, selecting the infrastructure and technologies best suited to meet the sustainability challenges of clients;

- IT for Green: helping to protect the environment by introducing new technologies and services and taking action to fight climate change.

EXAMPLES OF INITIATIVES AND PROJECTS IMPLEMENTED BY THE GROUP

- **CarbonNeutral® Sopra Steria project teams**

Sopra Steria's teams are carbon neutral for all their business travel. CarbonNeutral® certification covers all Group business travel, offices and data centres since 2015.

- **Eco-design and eco-testing at Sopra Steria and in our Interaction Factories**

At Sopra Steria, and more specifically in our Interaction Factories (software development centres bringing together experts in new technologies), we firmly believe that our mobile applications can help protect the planet. By applying eco-design principles when developing our applications, and by carrying out environmental tests on all our projects, we are actors of this change and are helping to reduce the energy consumption of mobile applications. To support this goal and advance its aims among our clients, Sopra Steria has partnered with Greenspector, a startup specialising in energy-efficiency solutions for mobile and IoT applications.

- **Smart DCIM, a new Green approach to IT infrastructure management**

Sopra Steria is working on a pilot with the hosting provider Data4 Services and the data centre consultancy APL to give our clients a clearer picture of the environmental footprint of the data we host for them at our data centres. The aim of this Smart DCIM (or data centre infrastructure management) solution is to help our clients determine the environmental footprint of their information systems by using simple, easy-to-understand indicators (consumption of power, water and other resources, and measurement of greenhouse gas emissions) over the entire life cycle of infrastructure components in order to plan and put in place improvements aimed at reducing their environmental footprint.

- **Collaborative management of urban mobility and encouragement of low-carbon business travel**

In order to address traffic congestion problems affecting employees working near an airport serving a large European city, Sopra Steria is working alongside businesses and urban authorities in the area to put in place a collaborative mobility management system. The social, economic and environmental impact of traffic congestion was analysed by this project, which was selected and received funding under the Urban Innovative Actions (UIA) programme, an EU initiative. Sopra Steria contributed its smart city expertise, its know-how relating to complex IT platforms and its mastery of agile development methods to provide a multi-stakeholder platform able to:

- bring together varied data sources (in terms of the sources themselves and their temporalities) in accordance with current and future regulations,

- demonstrate the operational value of the data displayed for collaborative governance,

- calculate the GHG emission reductions achieved and the reduction in emissions of pollutants via changes in employee transport options;

- **Application to foster development of low-carbon mobility solutions**

In France, Sopra Steria is taking part in a project that aims to assist households, businesses, communities and regions in reducing their energy consumption. It was chosen for support by the French energy savings certificates programme. To build wider awareness of carbon-neutral transport options, this project plans to introduce individual carbon-neutral mobility accounts. Each volunteer account holder will be able to measure the environmental footprint of the transport options selected via a smart application, and to earn rewards for making more responsible mobility choices. Eco-design principles and environmental testing are to be implemented for the development of the application.

- **Support for the environmental challenges facing the aeronautics industry**

The aviation industry has committed itself to two key decarbonisation targets:

- carbon-neutral growth: net carbon emissions from aviation will be capped from 2020,

- 50% reduction in CO emissions by 2050, compared with 2005 levels,

- Sopra Steria is supporting various industry players under projects helping to bring about significant reductions in resource consumption and greenhouse gas emissions.

- **Smart building solution for better energy management**

Sopra Steria's Active3D smart building solution helps building users improve energy management, thereby reducing their environmental impact.

Active3D's services make use of business information modelling (BIM) to create 3D models of buildings and all their electrical and hydraulic infrastructure, taking account of environmental, thermal and acoustic constraints. Active3D has recently launched BIM Green, which can result in annual energy savings of 10% to 30%.

> Sopra Steria is also considering committing itself to becoming **net-zero in emissions of greenhouse gases** before 2050, reinforcing its commitment, already validated by the SBTi, to aligning its emissions reduction targets with efforts to limit the global temperature rise to 1.5°C.

4.5. Climate change : A challenge we can anticipate and control

According to the Group's risk mapping exercise, climate action does not constitute a key risk. For many years, Sopra Steria has made efforts to limit the environmental impact of its operations, going beyond regulatory requirements by committing to a proactive continuous improvement process involving all stakeholders.

The Group believes that climate action must be incorporated into the actions of all organisations, businesses and states. Thanks to digital and other new technologies, this challenge should result in new opportunities to build a more sustainable world and contribute to protecting the environment extending beyond our respective activities.

5. Ethics and compliance

As a fundamental aspect of the Group's culture, the ethical values and principles laid down in its Code of Ethics guide the Group's operations and expansion and serve as the foundation for all of Sopra Steria's policies and commitments.

In keeping with the values and ethical principles it promotes, the Group has adopted an Ethics and Compliance programme concerning in particular human rights, fundamental freedoms, measures to prevent corruption and influence peddling, duty of care, compliance and transparency in relation to tax regulations, confidentiality and the protection of personal data.

Under the Group's risk mapping exercise, the risk of an ethical or legal violation is classed as a key risk for the Group.

Sopra Steria is a signatory of the United Nations Global Compact, in the "Global Compact Advanced" reporting category (top 8%). Under this commitment, Sopra Steria supports the Global Compact's ten principles, including in particular the principle of anti-corruption.

Sopra Steria supports the United Nations Sustainable Development Goals 1, 4, 8, 12, 13 and 16 related to ethics and compliance.

5.1. Governance and organisation

Sopra Steria has decided to bring together compliance, internal control and risk management within the Internal Control Department, which reports directly to the Group's Executive Management. This department appears before the Audit Committee and the Nomination, Governance, Ethics and Corporate Responsibility Committee at regular intervals.

This structure allows for centrally coordinated, Group-wide governance to deal with compliance issues, compliance controls, whistleblowing and risks.

- The Internal Control Department oversees compliance issues and coordinates all stakeholders involved in compliance and internal control across the Group. The Internal Control Director is the primary reference point for the whistleblowing system in his/her capacity as Group Compliance Officer.
- This department is supported by the network of Internal Control and Compliance Officers, appointed to work with local teams in each Group entity.
- It also works with the Group-level functional and operational departments, each with expertise in its own area (Human Resources Department, Legal Department, Finance Department, Real Estate and Purchasing Department, Security Department, Industrial Department, and Corporate Responsibility and Sustainable Development Department). To ensure that all compliance issues are covered, each of these departments has its own correspondents within the Group's various entities.

The Compliance and Internal Control Steering Committee unites the Chairman, Executive Management and relevant departments to review compliance issues and programme progress and implementation, more specifically concerning the programme to prevent and combat corruption and influence peddling.

The Internal Control Department and the Internal Audit Department meet regularly to exchange updated information, notably concerning the audit plan and the identification of risks.

All compliance issues are regularly presented to the Board's Audit Committee by the Internal Control Department.

A Stock Market Ethics Committee has also been formed. This committee meets as often as necessary, and in any event once a month.

Risk management and control within the Group, and the relationship with the Internal Audit Department and external auditors, are described in more detail in Section 3., "Internal control and risk management", of Chapter 2., pages 45 to 49 of this document.

5.2. Policies and procedures

5.2.1. A CODE OF ETHICS AND CORE VALUES SUPPORTED AT THE HIGHEST LEVELS OF THE GROUP

The Sopra Steria Code of Ethics expresses the Group's values and is based on shared ethical principles that apply to all Group entities, including in particular respect, integrity and transparency.

Through this code, the Group is committed to abiding by laws and regulations in force in the countries in which its entities operate, as well as operating to the strictest possible standards of business conduct.

It is supported by Group management, which is responsible for ensuring that these rules are observed. The code applies to all Sopra Steria employees to ensure that the Group's businesses operate effectively.

Under this code, Sopra Steria is committed to ensuring that the Group and its employees abide by the following:

- respect for individuals;
- human rights and fundamental freedoms;
- local laws and customs;
- rules on the prevention and refusal of all forms of active or passive corruption, whether direct or indirect, and conflicts of interest;
- competition rules;
- confidentiality of information to which employees have access in the course of their duties and activities.

Depending on local legislation, additional charters and rules on business ethics are put in place and regularly reviewed.

As regards human rights, Sopra Steria's commitments, reiterated in the Group Code of Ethics, are as follows:

- to combat child labour, child exploitation, forced labour and all other forms of compulsory labour (including commitments against slavery);
- to comply with European Community and domestic labour law and collective bargaining agreements in each country where the Group operates;

- to respect the exercise of trade union rights in each of the countries in question;
- to preserve health, safety and dignity in the workplace;
- to comply with the principles of equality, diversity and non-discrimination.

Sopra Steria Group is a signatory to the United Nations Global Compact, in the "Global Compact Advanced" category, and adheres to the principles and fundamental entitlements of the Universal Declaration of Human Rights of the United Nations and the Charter of Fundamental Rights of the European Union:

- fundamental human rights, and in particular the ban on child labour and all forms of slave, forced and mandatory labour;
- compliance with embargoes, and prevention of arms trafficking, drug trafficking and terrorism;
- compliance with trade rules and customs import and export licences;
- health and safety rights for personnel and third parties;
- right to work and immigration and ban on undeclared work, slavery and people trafficking;
- environmental protection;
- prevention of economic crime, including in particular corruption, gaining undue advantage, extortion, misappropriation of public funds, criminal favouritism, fraud, influence-peddling (or equivalent offence under applicable law), embezzlement, breach of trust, counterfeiting, forgery, and all related offences;
- anti-money laundering;
- competition law;
- right to non-discrimination.

The Code of Ethics is supplemented by a code of conduct for stock market transactions, which covers securities trading and the prevention of insider dealing, in compliance with the European Market Abuse Regulation (Regulation (EU) 596/2014).

5.2.2. CORE RULES AND GROUP PROCEDURES

Beyond the Code of Ethics, which reaffirms the Group's fundamental principles and values, the compliance system within Sopra Steria is supported by a common core of rules and procedures (management, human resources, purchasing, sales, operations and production, finance and accounting, security, etc.).

As part of the compliance programme, work was undertaken at Group level in 2019 for continuous improvement of existing rules and clarify guidelines and procedures in order to ensure compliance with new regulations, implement these new procedures within the Group and strengthen control points.

5.3. Measures to prevent and combat corruption

To support the Group's development and growth and meet new regulatory requirements, the Chairman and Executive Management decided to supplement work to formalise all Group rules by launching a compliance programme to prevent and combat bribery and influence peddling across all subsidiaries and geographic regions.

In particular, the anti-corruption framework includes the following:

- **a high degree of executive involvement** in the implementation and monitoring of the Group's programme to prevent corruption and influence peddling. This firm commitment takes shape in particular through the Group's specific code of conduct covering these issues, the direct oversight of the programme at its steering committee meetings, informational

meetings for senior managers and regular communications campaigns targeting all Group employees;

- **a Group-wide organisational structure** in charge of managing, monitoring and controlling the framework, via Compliance Officers, who have responsibility for compliance and risk management issues within each entity;
- **a specific risk-mapping exercise for bribery and influence-peddling risks**, carried out at the same intervals and applying the same methodology used for the overall risk mapping exercise, and shared with the affected staff;
- **a specific Code of Conduct for the prevention of corruption and influence peddling**, including a foreword by the Chairman of the Board of Directors and the Chief Executive Officer and illustrated with real-world examples, as a supplement to the Code of Ethics. This Code of Conduct has been translated into 10 languages and covers all Group entities. The code is now incorporated into the internal rules of Group entities in France, after completing the necessary procedures with the employee representative bodies;
- **a disciplinary regime** based on the Code of Conduct made binding via its inclusion in the internal rules, with the understanding that the Group applies a zero-tolerance policy with respect to corruption and influence peddling;
- **specific, formal procedures**, allowing in particular for the implementation of the associated first- and second-level controls, in order to respond to situations identified as potentially exposed to risk. For example: Policy on gifts and hospitality; procedures relating to conflicts of interest; procedure for client events; procedure relating to export transactions, which continued its rollout during the year;
- **a stricter procedure for assessing third parties**, including clients, suppliers and subcontractors. In this regard, the Group has formalised and rolled out a new purchasing procedure and expanded its suppliers' charter to cover all new regulations, and more specifically regulations relating to the Sapin II Act and the duty of care;
- **a Group training programme** aimed at raising awareness among all employees, using a practical and accessible approach, and training those segments of the workforce considered as the most exposed in light of the results of the risk mapping exercise for bribery and influence-peddling risks. This programme is based on the following:
  - an e-learning module for all staff, which has been rolled out gradually since December 2018 and is available in five languages. It is easily accessible via the website of Sopra Steria's training organisation. The module includes several interactive sections, six of which consist of one or more videos and real-life situations, covering the following themes: gifts and hospitality, public officials, conflicts of interest, intermediaries, sponsoring and patronage, alerts and sanctions. By successfully completing the 12-question quiz at the end of the module, the learner receives a validation certificate. At 31 December 2019, 99% of Group staff were able to access this e-learning module. More than 37,400 employees have thus been trained since the module was launched,
  - face-to-face training for those considered the most at risk: managers, sales staff, buyers, public sector, export, etc. The objectives of this training are to build knowledge of laws and regulations as well as Group rules and procedures for preventing and combating corruption and influence peddling, learn to apply best practices and become aware of the contact individuals within the Group for these issues, and gain a deeper understanding of best practices via case studies based on real-world examples,

- inclusion of dedicated sections in induction training and business training modules, to ensure wider dissemination of information relating to anti-corruption practices;

■ **strengthened control and audit procedures.** The specific controls are covered in the procedures developed under the programme for the prevention of corruption and influence peddling and may be either ongoing or periodic. In addition to the first-level controls carried out in the form of self-checks by the employees concerned and by line managers, controls are mainly performed, depending on the area involved, by the functional departments concerned (Finance Department, Internal Control Department, Industrial Department, Legal Department, Human Resources Department). Corruption and business ethics risks are also assessed by the Internal Audit Department when auditing the Group's subsidiaries and/or divisions, by running through some 30 specific checks, defined in collaboration with the Internal Control Department, and during specific compliance audits as part of the internal audit programme;

■ **a whistleblowing system,** set up in the first quarter of 2019, incorporating the French legal requirements laid down by the Sapin 2 and duty of care laws and rolled out to all Group entities. In 2020, the system will also be rolled out to the Group's external stakeholders and in particular its clients, suppliers and other business partners.

5.4.   Tax regulations and transparency

Regarding its tax policy, pursuant to Article L. 225-102-1 of the French Commercial Code, Sopra Steria Group is committed to complying with the tax laws and regulations applicable in all of the countries in which it is present, as well as the relevant international standards, such as those of the OECD, in particular those pertaining to transfer prices, through measures including documenting its transfer prices and filing a statement for each country with the competent tax authorities.

Sopra Steria Group is regularly audited by the competent tax authorities, with which it fully cooperates.

Sopra Steria Group also abstains from establishing operations in tax havens (uncooperative countries or territories on the official French list or the European Union's blacklist), has no bank accounts at banks established in such countries or territories, and more generally abstains from creating any entities that have no economic substance or business purpose.

5.5.   Data protection

5.5.1.   PROTECTION OF PERSONAL INFORMATION

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 – known as the General Data Protection Regulation, or GDPR – entered into force on 25 May 2018. Sopra Steria Group and its subsidiaries have rolled out a programme intended to ensure compliance with this regulation and local laws.

This programme is directed by the Group's Legal Department, which is responsible for coordinating measures to protect personal data processed by Group companies (both for their own purposes and on behalf of their clients), and includes:

■ the appointment of Data Protection Officers (DPOs) with each of the Group entities concerned;

■ the rollout of a specific tool to keep records of all processing of personal data by Group entities;

■ the implementation of:

- specific procedures to respond to requests received from individuals exercising their rights relating to personal data (including the right of access, the right to rectification, the right to object to processing, etc.

  – for employees of Group companies,

  – for third parties (for example, job applicants in connection with recruitment procedures),

  – for personal data processed by Group companies under contractual arrangements with their clients, as instructed in writing by the latter;

- a whistleblowing procedure to report actual or suspected abuses and irregularities relating to personal data;

■ the adaptation of contracts (including those involved in subcontracting activities) as well as the various internal or external materials and media to comply with legal and regulatory requirements;

■ the rollout of a mandatory training module for all existing Group employees and for every new employee.

In addition, at Sopra HR Software, the Sopra Steria Group's HR solutions publisher subsidiary, the Binding Corporate Rules (BCR) have been in place within its entities since 2015.

5.5.2.   PROTECTING AND SECURING CLIENT DATA

The Group has put in place a policy and robust system across all its entities and operations, supported by an appropriate organisational structure, procedures and controls that are reviewed annually. These measures are discussed in Section 1, "Risk factors" of Chapter 2., pages 36 to 44 of this document.

5.6.   Duty of care and vigilance plan

This section presents the vigilance plan, which covers all reasonable vigilance measures aimed at identifying risks and preventing serious violations of human rights and fundamental freedoms as well as adverse impacts on health, safety and the environment, as laid down by the French duty of care law (Law no. 2017-399 of 27 March 2017).

These risks, serious violations and adverse impacts include those resulting from the activities of the Company and of the companies it controls, within the meaning of Article L. 233-16 of the French Commercial Code, whether directly or indirectly and across the Group's entire scope of operations, as well as from the activities of subcontractors or suppliers with which Sopra Steria has business relations, in France and around the world.

The vigilance plan was prepared by the main departments responsible for the areas covered by the duty of care, discussed with the Group's Executive Committee and then validated by Executive Management. It was also presented to the Works Council. In addition, as a preliminary step for the preparation of the plan, the results of the Group's risk mapping exercise for the issues involved were aligned with those of its materiality analysis.

The vigilance plan consists of four components, to reflect the measures required by the French duty of care law:

- a mapping of risks to identify, analyse and prioritise the risks relating to the duty of care;
- risk mitigation and prevention plans;
- a whistleblowing system for the receipt of reports relating to the existence of risks or the occurrence of risk events;
- a system to monitor the measures implemented and assess their effectiveness.

The vigilance plan is reviewed each year, in light of possible developments in risks, the effectiveness of mitigation measures put in place, and developments in the Group's business and operations.

Furthermore, reasonable vigilance measures are implemented gradually for newly acquired companies as part of the integration of these companies within the Group and with respect to its procedures and systems.

5.6.1. RISK MAPPING EXERCISE

The mapping of risks relating to the duty of care was built by drawing on the Group's overall risk mapping exercise as well as the main risks identified during the preparation of the Group's statement of non-financial performance. The methodology used for the mapping of risks relating to the duty of care is the same as that used for the Group's overall risk mapping exercise and thus involves consultations with the various departments concerned, with responsibility for the

entire scope of the Group's operations, namely the Human Resources Department, the Corporate Responsibility and Sustainable Development Department, the Real Estate and Purchasing Department, the Industrial Department, the Information Systems Department, the Legal Department and the Internal Control Department.

Given its business activities, Sopra Steria has limited exposure to risks relating to the duty of care. Nevertheless, some of the risks identified were considered as having an impact, although without being regarded as major risks falling within the scope of the duty of care.

The risks listed below relating to the duty of care were analysed and prioritised in line with their severity and likelihood of occurrence in the context of the Group's business activities and those of its main suppliers:

- Human rights and fundamental freedoms: protection of personal data, freedom of speech, child labour, forced labour, freedom of assembly and association, failure to respect the rights of local communities;
- Health and safety: right to health, right to safe and healthy working conditions (e.g. access to buildings, sanitation, safety and security of business travel), prevention of occupational illnesses, healthcare benefits and workplace prevention measures;
- Environment: air and soil pollution, depletion of raw materials, soil erosion and degradation, treatment of polluting waste, GHG emissions, degradation of ecosystems and biodiversity.

5.6.2. RISK MITIGATION AND PREVENTION PLANS

The continuous improvement approach adopted in line with the Group's corporate responsibility policy put in place several years ago focuses on the various issues targeted by the French duty of care law. The cross-reference table below indicates the sections within the statement of non-financial performance included in this document that describe the risk mitigation and prevention plans identified in the mapping of risks relating to the duty of care.

Area	Category	Mitigation plans and preventive measures
Risks relating to the Group's business activities	Human rights and fundamental freedoms	See Sections 2., 3. and 5., pages 107, 114 and 128 of this chapter
	Health and safety	See Section 2.1.5., page 111 of this chapter
	Environment	See Section 4., page 120 of this chapter
Risks relating to the business activities of the Group's suppliers	Responsible purchasing	See Section 3.4., page 117 of this chapter

5.6.3. WHISTLEBLOWING SYSTEM

The whistleblowing system put in place under the Sapin 2 law on transparency, anti-corruption and the modernisation of economic life also covers the duty of care. This system is accessible to employees of all Group entities. A description of the whistleblowing system and its procedures is provided on the Group's intranet as well as those of all its subsidiaries. Reports are to be submitted via a specific email address for each entity or at Group level.

The system will be expanded in early 2020 to the Group's external stakeholders and in particular its clients, suppliers and other business partners.

5.6.4. SYSTEM TO MONITOR THE MEASURES IMPLEMENTED AND ASSESS THEIR EFFECTIVENESS

For risks relating to the duty of care, the procedures for the regular assessment of the Group's business activities and those of its subsidiaries, along with those of its main suppliers, are carried out at the level of the departments concerned. Each department with oversight for issues involving the duty of care is responsible for monitoring the risks identified in the mapping of risks relating to the duty of care.

All of these departments are involved in the identification and implementation of reasonable and appropriate vigilance measures for their respective areas of responsibility. They report on their monitoring activities at the Group's steering committee meetings and twice a year to the Corporate Responsibility and Sustainable Development Committee.

The risk mitigation and prevention measures put in place with regard to the duty of care are reviewed as part of the Group's internal control procedures and are the focus of a consolidated report drawn up each year by the Internal Control Department and presented to Executive Management.

6. SDG/GRI/TCFD-CDSB cross-reference table

Universal Registration Document		SDGs	GRI	TCFD-CDSB *(Climate Change Reporting Framework)*
Chapter /Section #				
1.	**Chapter 1 – Business overview and strategies**			
2.	**Chapter 2 - Risk factors and internal control**			*REQ-02 Risks and opportunities*
4.	**Chapter 4 – Corporate responsibility**			
1.	**Sopra Steria, a committed and responsible Group, bringing a sustainable, human and guiding contribution**			
1.1.	Overview of the Group's corporate responsibility strategy and governance	101		
1.1.1.	A long-term commitment to the UN Global Compact	102	16. Peace, justice and strong institutions 17. Partnerships for the goals	
1.1.2.	Materiality analysis of key environmental, social and governance (ESG) issues aligned with the business model	103		
1.1.3.	A corporate responsibility governance structure supporting the Group's priorities	104		*REQ-03 Governance*
1.2.	Major recognition	105		
1.3.	Overview of reporting scope	105		*REQ-08 Reporting policies*
2.	**Social responsibility: a committed and responsible collective**			
2.1.	Responsible employment challenges	107		
2.1.1.	Attracting and retaining more talent	108	8. Decent work and economic growth	GRI 401-1
2.1.2.	Maintaining and developing skills	109	8. Decent work and economic growth 4. Quality education	GRI 404-1 GRI 404-3
2.1.3.	Diversity and equal opportunity	109	5. Gender equality 10. Reduced inequalities	GRI 406-1 GRI 405-2
2.1.4.	Labour relations	111	17. Partnerships for the goals	GRI 407-1
2.1.5.	Health and safety	111	3. Good health and well-being for people	
2.2.	Other labour-related information	112	10. Reduced inequalities	
2.2.1.	Jobs and the workforce	112	11. Sustainable cities and communities	GRI 102-8
2.2.2.	Compensation	113	1. No poverty	
2.2.3.	Working conditions and organisation	113	3. Good health and well-being for people	GRI 403-9

Universal Registration Document			SDGs	GRI	TCFD-CDSB *(Climate Change Reporting Framework)*
Chapter /Section #					
3.	**Societal responsibility: Engaging all our stakeholders to build a positive future for all**				
3.1.	Dialogue with stakeholders	114	17. Partnerships for the goals	GRI 102-12 GRI 102-13 GRI 102-40 GRI 102-42	
3.2.	Innovation and strategic partnerships	115	9. Industry, innovation and infrastructure 11. Sustainable cities and communities 13. Climate action		
3.3.	Responsibility in digital	116	9. Industry, innovation and infrastructure 11. Sustainable cities and communities		
3.4.	Responsible purchasing	117	8. Decent work and economic growth 10. Reducing inequalities 12. Responsible consumption and production 16. Peace, justice and strong institutions	GRI 308-1	
3.5.	Community and patronage	118	1. No poverty 2. Zero hunger 3. Good health and well-being 4. Quality education 6. Clean water and sanitation 8. Decent work and economic growth 11. Sustainable cities and communities		
3.6.	Regional impact	119	9. Industry, innovation and infrastructure 17. Partnerships for the goals		
4.	**Environmental responsibility: innovating to address climate change and protect the environment along our value chain**				
4.1.	Major commitments defined with leading global organisations	120	17. Partnerships for the goals	GRI 305-1, GRI 305-2, GRI 305-5, GRI 302-1, GRI 302-2, GRI 302-4, GRI 302-5, GRI 413-1, GRI 102-56, GRI 102-27, GRI 102-28	*REQ-01 Management's environmental policies, strategy and targets*
4.2.	Environmental challenges: Opportunities for the Group	121		GRI 102-15, GRI a201-2, GRI 102-1, GRI 102-7, GRI 308-2,	*REQ-02 Risks and opportunities*
4.3.	A Group recognised for its environmental commitment and action	121	6. Clean water and sanitation 7. Affordable and clean energy 8. Decent work and economic growth 9. Industry, innovation and infrastructure 11. Sustainable cities and communities 12. Responsible consumption and production 13. Climate action 14. Life below water 15. Life on land	GRI 102-14, 102-18	*REQ-03 Governance*

Universal Registration Document			SDGs	GRI	TCFD-CDSB (Climate Change Reporting Framework)
Chapter /Section #					
4.4.	Targets and key achievements	122	13. Climate action	GRI 102-10, GRI 102-49, GRI 302-4, GRI 302-5, GRI 305-5, GRI 30&-3	*REQ-04 Sources of environmental impact REQ-05 Performance and comparative analysis REQ-06 Outlook REQ-07 Organisational boundary REQ-08 Reporting policies*
4.5.	Climate action: A challenge we can anticipate and control	127	4. Quality education		
5.	**Ethics and compliance**				
5.1.	Gouvernance et organisation	128	1. No poverty 8. Decent work and economic growth 13. Climate action 16. Peace, justice and strong institutions		
5.2.	Policies and procedures	128	16. Peace, justice and strong institutions		
5.3.	Measures to prevent and combat corruption	129	4. Quality education		
5.4.	Tax regulations and transparency	130	16. Peace, justice and strong institutions		
5.5.	Data protection	130	16. Peace, justice and strong institutions		
5.6.	Duty of care and vigilance plan	131	8. Decent work and economic growth 12. Responsible consumption and production 13. Climate action 16. Peace, justice and strong institutions		

7. Annex: Social and environmental indicators

The elements of information identified with the ✔ symbol have been audited by the independent third party to provide a reasonable assurance opinion.

7.1. Summary of social indicators

WORKFORCE

❚ **WORKFORCE BY GEOGRAPHIC AREA (ACQUISITIONS INCLUDED)**

Scope/Topic	2019	2018	2017
Group	**46,245**	**44,114**	**41,661**
France	19,499	19,013	18,649
International (excluding France)	26,476	24,849	23,012
of which United Kingdom	6,305	6,407	6,181
of which India	5,726	5,348	5,200
of which Spain	4,189	4,060	3,562
of which Germany	3,363	2,842	2,370
of which Norway	1,792		
of which Italy	1,009		
of which Morocco	308		
Managers ("cadres")	**40,014**	**40,001**	**38,626**

Note
The notion of "cadres" is specific to France and refers to individuals with technical, administrative, legal, commercial or financial training to whom the employer has delegated significant authority over co-workers of every type. In English, these employees are referred to as managers. The number of managers outside France is extrapolated from the figures for France.

❚ **FULL-TIME EQUIVALENT (FTE) WORKFORCE (EXCLUDING INTERNS)** ✔

Scope/Topic	2019	2018	2017
Group	**44,230**	**42,614**	**40,241**
France	18,849	18,439	18,086
International (excluding France)	25,381	24,175	22,155
of which United Kingdom	6,057	5,903	5,956
of which India	5,724	5,347	5,199
of which Spain	4,128	4,005	3,511
of which Germany	2,733	2,655	2,217
of which Norway	1,790		
of which Italy	944		
of which Morocco	299		

❙ WORKFORCE BY TYPE OF EMPLOYMENT CONTRACT ✔

Scope/Topic	2019	2018	2017
Permanent contracts			
Group	**96.1%**	**95.7%**	**96.1%**
France	95.3%	95.6%	96.3%
International (excluding France)	96.7%	95.7%	96.0%
of which United Kingdom	95.2%	94.1%	96.4%
of which India	99.0%	99.0%	98.6%
of which Spain	97.3%	93.8%	91.8%
of which Germany	94.4%	94.8%	95.1%
of which Norway	99.6%		
of which Italy	94.0%		
of which Morocco	99.7%		
Temporary contracts			
Group	**3.3%**	**3.6%**	**3.3%**
France	4.6%	4.1%	3.4%
International (excluding France)	2.4%	3.3%	3.3%
of which United Kingdom	4.7%	5.9%	3.6%
of which India	1.1%	1.0%	1.4%
of which Spain	2.5%	5.8%	7.9%
of which Germany	1.3%	1.7%	1.6%
of which Norway	0.5%		
of which Italy	0.7%		
of which Morocco	0.3%		
Internships			
Group	**0.6%**	**0.7%**	**0.6%**
France	0.2%	0.3%	0.3%
International (excluding France)	0.9%	1.0%	0.8%
of which United Kingdom	0.1%	0%	0%
of which India	0.0%	0%	0%
of which Spain	0.2%	0.4%	0.3%
of which Germany	4.3%	3.6%	3.3%
of which Norway	0%		
of which Italy	5.4%		
of which Morocco	0%		

❙ AVERAGE LENGTH OF SERVICE FOR EMPLOYEES ON PERMANENT CONTRACTS

Scope/Topic	2019	2018	2017
Group	**7.1**	**7.1**	**7.3**
France	8.0	8.0	8.0
International (excluding France)	6.4	6.4	6.8
of which United Kingdom	10.3	10.7	10.8
of which India	4.4	4.3	4.3
of which Spain	5.0	5.0	5.2
of which Germany	7.5	7.3	8.2
of which Norway	4.1		
of which Italy	6.0		
of which Morocco	4.1		

❙ AVERAGE AGE OF EMPLOYEES ON PERMANENT CONTRACTS

Scope/Topic	2019	2018	2017
Group	**37.8**	**37.8**	**37.8**
France	37.8	37.5	37.5
International (excluding France)	37.8	38.0	38.0
of which United Kingdom	43.6	44.2	44.1
of which India	31.4	31.3	31.2
of which Spain	37.5	37.4	37.4
of which Germany	41.6	41.7	42.7
of which Norway	38.0		
of which Italy	38.0		
of which Morocco	32.0		

❙ TURNOVER RATE FOR EMPLOYEES ON PERMANENT CONTRACTS

Scope/Topic	2019	2018	2017
Group	**17.7%**	**16.9%**	**15.6%**
France	15.9%	16.2%	14.5%
International (excluding France)	18.9%	17.4%	16%
of which United Kingdom	21.7%	19.4%	20%
of which India	19.4%	21.6%	18%
of which Spain	20.5%	16.6%	15%
of which Germany	14.7%	12.4%	11%
of which Norway	12.8%		
of which Italy	13.0%		
of which Morocco	25.5%		

Notes
Turnover rate = [Number of leavers on permanent contracts − Number of leavers on permanent contracts having been with the Group for less than six months]/Number of employees on permanent contracts present on the last day of the reference period (excluding suspended employees).
In 2017, there were 114 redundancies or dismissals among employees on permanent contracts, compared with 120 in 2016.

Attractiveness

❙ NEW STAFF ON ALL TYPES OF EMPLOYMENT CONTRACT ✔

Scope/Topic	2019	2018	2017
Group	**10,844**	**11,662**	**9,500**
France	4,112	4,356	3,645
International (excluding France)	6,732	7,306	5,855
of which United Kingdom	1,155	1,083	998
of which India	1,695	1,636	1,595
of which Spain	1,229	1,414	1,151
of which Germany	651	770	586
of which Norway	499		
of which Italy	219		
of which Morocco	93		

❙ NEW STAFF ON PERMANENT CONTRACTS ✔

Scope/Topic	2019	2018	2017
Group	**8,047**	**9,225**	**7,366**
France	2,570	3,135	2,616
International (excluding France)	5,477	6,090	214,750
of which United Kingdom	942	784	811
of which India	1,620	1,533	1,356
of which Spain	1,084	1,193	895
of which Germany	488	623	466
of which Norway	428		
of which Italy	107		
of which Morocco	61		

Development of talent

❙ TRAINING (EXCLUDING STUDENTS ON WORK PLACEMENTS AND INTERNS) ✔

Scope/Topic	2019	2018	2017
Number of agreements signed during the year	**1,263,354**	**1,244,583**	
France	619,219	596,557	546,090
India	115,630	180,105	161,578
Spain	94,114	136,201	126,882
Germany	103,282	36,972	35,678
Norway	140,874	115,820	94,358
United Kingdom	83,117		
Morocco	14,723	19,651	11,476

Scope/Topic	2019	2018	2017
Number of hours training provided during the year	**180,479**		
France	88,460	85,222	78,013
India	16,519	25,729	23,083
Spain	13,445	19,457	18,126
Germany	14,755	5,282	5,097
Norway	20,125	16,546	13,480
United Kingdom	11,874		
Morocco	2,103	2,807	1,639

Scope/Topic	2019	2018	2017
Average number of days training per person (average FTE)	**4.1**		
France	4.2	4.6	4.3
India	3.0	4.8	4.4
Spain	3.3	4.9	5.2
Germany	5.5	2.0	2.3
Norway	11.8	10	10.3
United Kingdom	1.9		
Morocco	7.1	9.3	5.8

Labour relations

Scope/Topic	2019	2018	2017
Number of agreements signed during the year	**49**	**36**	
France			
UES (economic and employee unit)	6	4	1
Sopra Steria	1	2	2
Sopra Banking Software	7	4	1
I2S	1	3	1
Sopra HR Software	2	3	0
CIMPA	5	5	2
Galitt	2		
Cassiopae			2
Germany			
Sopra Steria	18	10	17
Sopra Banking Software	2	1	1
Sopra HR Software	1	0	1
CIMPA	3	3	3
Belgium			
Sopra Steria	0	0	2
Sopra Banking Software	0	0	0
United Kingdom			
Sopra Steria	0	0	0
Italy			
Sopra Steria	0	1	0
Spain			
Sopra Steria	1		
Number of collective agreements in force	**291**	**241**	
France			
UES (economic and employee unit)	14	16	15
Sopra Steria	14	23	21
Sopra Banking Software	31	21	20
I2S	6	2	3
Sopra HR Software	17	13	13
CIMPA	28	16	12
Cassiopae			0
Galitt	19		
Germany			
Sopra Steria	70		55
Sopra Banking Software	18		15
Sopra HR Software	13		12
CIMPA	33		27
Belgium			
Sopra Steria	11		9
Italy			
Sopra Steria	5		2
United Kingdom			
Sopra Steria	11		12
Spain			
Sopra Steria	1		

Health and safety

❚ **WORKING CONDITIONS AND ORGANISATION**

Scope/Topic	2019	2018	2017	Notes
France				
Frequency rate of workplace accidents in France	2.47	1.91	1.68	Rates calculated in business days.
Severity rate of workplace accidents in France	0.023	0.056	0.035	Rates calculated in business days.
Absence rate	2.6%	2.5%	2.1%	Rates calculated in business days.

❚ **ORGANISATION OF WORK AND WORKING HOURS/PART-TIME WORK – EMPLOYEES ON PERMANENT CONTRACTS AT 31 DECEMBER**

Scope/Topic	2019	2018	2017
Group	**5.9%**	**6.1%**	**6.3%**
France	5.9%	6.0%	6.2%
International (excluding France)	5.9%	6.2%	6.3%
of which United Kingdom	12.8%	14.1%	13.0%
of which India	0.1%	0.2%	0.2%
of which Spain	6.3%	5.9%	6.9%
of which Germany	8.8%	9.0%	9.4%

Diversity and equal opportunity

❚ **PERCENTAGE OF EMPLOYEES WITH A DISABILITY ✔**

Scope/Topic	2019	2018	2017	Notes
France	3.06%	2.72%	2.46%	

❚ **FEMALE REPRESENTATION IN THE WORKFORCE**

Scope/Topic	2019	2018	2017
Female staff			
Group	**32.0%**	**31.6%**	**31%**
France	29.4%	28.4%	27%
International (excluding France)	34.0%	34.0%	34%
of which United Kingdom	43.7%	44.9%	43%
of which India	33.1%	34.3%	33%
of which Spain	28.6%	27.7%	27%
of which Germany	25.2%	24.1%	24%
of which Norway	27.3%		
of which Italy	28.5%		
of which Morocco	35.1%		
Female recruitment			
Group	**33.1%**	**32.8%**	**31%**
France	30.9%	29.7%	27%
International (excluding France)	34.4%	34.7%	33%
of which United Kingdom	44.2%	48.2%	46%
of which India	35.4%	38.4%	34%
of which Spain	21.9%	23.5%	26%
of which Germany	34.4%	29.9%	27%

Scope/Topic	2019	2018	2017
of which Norway	29.9%		
of which Italy	30.1%		
of which Morocco	41.9%		

Intergenerational approach

❙ REPRESENTATION OF YOUNG PEOPLE AND OLDER EMPLOYEES (INCLUDING INTERNS)

Workforce by age bracket ✔

Scope/Topic	2019	2018	2017
Group			
Under 25	10.0%	9%	9%
More than 55	8.7%	8%	8%
France			
Under 25	10.4%	10%	9%
More than 55	8.8%	8%	7%
International (excluding France)			
Under 25	9.6%	9%	9%
More than 55	8.6%	9%	9%
United Kingdom			
Under 25	8.0%	7%	6%
More than 55	20.1%	20%	20%
India			
Under 25	17.3%	17%	18%
More than 55	0.3%	0.3%	0.3%
Spain			
Under 25	5.4%	6%	5%
More than 55	3.4%	3%	2%
Germany			
Under 25	5.0%	4%	3%
More than 55	15.0%	15%	15%
Norway			
Under 25	2.5%		
More than 55	6.8%		
Italy			
Under 25	11.0%		
More than 55	6.6%		
Morocco			
Under 25	14.4%		
More than 55	0.7%		

❙ PERCENTAGE OF OLDER EMPLOYEES (ALL CONTRACTS, EXCLUDING ACQUISITIONS)

Scope/Topic	2019	2018	2017
Number of employees aged 45 and older	5,186	4,919	4,666
Percentage of older employees (number of employees aged 45 and older divided by the total workforce at 31/12)	27.2%	26%	25.4%
Number of employees aged 55 and older	1,680	1,499	1,338
Percentage of older employees (number of employees aged 55 and older divided by the total workforce at 31/12)	8.8%	8%	7.3%

7.2. Summary of environmental indicators

▌ TOTAL GREENHOUSE GAS EMISSIONS (BUSINESS TRAVEL, ENERGY, FUGITIVE EMISSIONS) ✔

| | Global greenhouse gas emissions (tCO$_2$e) – Market-based ✔ | | | | | | | | | | | | | | | |
| | Scope 1 | | | | Scope 2 | | | | Scope 3 | | | | Total Scopes 1, 2 and 3 | | | |
Year	2019	2018	2017	2015	2019	2018	2017	2015	2019	2018	2017	2015	2019	2018	2017	2015
Business travel**									34,310	35,922	36,653	32,005				
Energy Diesel, gas, biodiesel	2,664	1,685	1,821	2,237												
Grid electricity, district heating / Offices and on-site data centres					1,724	4,658	6,191	15,723								
Grid electricity / Off-site data centres									1,250	1,321	1,142	1,227				
Fugitive emissions	2,048	1,633	1,725													
TOTAL (INCLUDING FUGITIVE EMISSIONS)*	**4,712**	**3,318**	**3,546**		**1,724**	**4,658**	**6,191**		**35,560**	**37,243**	**37,795**		**41,996**	**45,219**	**47,532**	**N/A**
TOTAL (EXCLUDING FUGITIVE EMISSIONS)	**2,664**	**1,685**	**1,821**	**2,237**	**1,724**	**4,658**	**6,191**	**15,723**	**35,560**	**37,243**	**37,795**	**33,232**	**39,948**	**43,586**	**45,807**	**51 192**
TOTAL EMISSIONS PER EMPLOYEE (EXCLUDING FUGITIVE EMISSIONS)													**0.88**	**1.00**	**1.13**	**1.47**
TOTAL EMISSIONS PER EMPLOYEE (INCLUDING FUGITIVE EMISSIONS)													**0.93**	**1.04**	**1.18**	

Change in emissions per employee, 2019 compared with 2018
(including fugitive emissions and joint ventures) **10.8% reduction**

Change in emissions per employee, 2019 compared with 2015 (fugitive emissions included in 2019,
hotel stays excluded in 2015, joint ventures excluded in 2015 but included in 2019) **36.7% reduction**

For energy, emissions are calculated using the market-based method, under which a nil emissions factor is applied if the energy source is "green"; otherwise, "residual mix" emissions factors issued by the Association of Issuing Bodies or "location-based" emissions factors issued by the International Energy Agency are applied. For business travel, the emissions factors used are those arising from the GHG Protocol. For 2019, the scope for the calculation of indicators includes all entities over which the Group has operational control (and therefore includes the NHS SBS and SSCL joint venture sites) but does not include Groupe SAB or Sopra Financial Technology GmbH.
For other years, the scope of calculated indicators includes all entities over which the Group has operational control (and therefore includes NHS SBS and SSCL joint venture sites) but does not include Kentor, Galitt, Beamap, Cassiopae or 2MoRO.
* Fugitive emissions when available (not available for off-site data centres).
** Data taking into account emission reductions due to green business travel in Germany (37,164 tCOe, excluding the reduction in 2019).

❙ ENERGY CONSERVATION AND GREENHOUSE GAS EMISSIONS BY COUNTRY

		RESOURCE CONSERVATION ✔							GREENHOUSE GAS EMISSIONS ✔					
		Offices and on-site data centres			On- and off-site data centres				Offices and on-site data centres		On- and off-site data centres		Business travel	Fugitive emissions
		Energy consumption		Proportion of electricity consumption from renewable sources ****	Energy consumption			Proportion of total electricity consumption from renewable sources	Greenhouse gas emissions: market-based		Greenhouse gas emissions: market-based		Air + road + train + hotels **	
		Scope 1	Scope 2	Scope 2	Scope 1	Scopes 2 and 3	Scopes 1, 2 and 3	Scopes 2 and 3	Scope 1	Scope 2	Scope 1	Scopes 2 and 3	Scope 3	Scope 1
	Unit	MWh	MWh		MWh	MWh	MWh		tCO₂e	tCO₂e	tCO₂e	tCO₂e	tCO₂e	tCO₂e
TOTAL	**2019**	**14,682**	**67,507**	**90%**	**139**	**25,544**	**25,683**	**50%**	**2,664**	**1,724**	**34**	**1,270**	**37,164**	**2,048**
	2018	13,742	67,448	78%	254	32,827	33,081	60%	1,685	4,658	58	2,084	38,176	1,633
	2017	13,643	66,540	76%	314	33,769	34,083	61%	1,821	6,391	68	1,854	38,133	1,725
	2016	12,987	63,043	69%	367	35,403	35,770	63%	2,430	7,190	88	2,578	36,555	
	2015	12,623	63,563	20%	555	35,208	35,763		2,237	15,723	132	3,829		
Africa	**2019**	**0**	**915**	**100%**	**0**	**53**	**53**	**100%**	**0**	**0**	**0**	**0**	**462**	**4.6**
	2018	0	821	0%	0	53	53		0	416	0	36	547.1	5
	2017	0	606	0%	0	0	0		0	377	0	0	461	4.4
	2016	0	1,612	0%	0	0	0		0	959	0	0	412	0
	2015	0	445	0%	0	0	0		0	259	0	0		0
Germany, Austria	**2019**	**97**	**1,930**	**77%**	**0**	**130**	**130**	**0%**	**18**	**377**	**0**	**94**	**9,460**	**5**
	2018	0	1,564	87%	0	141	141	0%	0	308	0	103	9,164.0	5
	2017	0	1,987	86%	0	422	422	63%	0	324	0	114	9,046	6.2
	2016	0	2,177	96%	0	792	792		0	251	0	221	8,183	
	2015	0	2,337	93%	0	1,007	1,007		0	358	0	0		
Benelux	**2019**	**1,694**	**1,770**	**10%**	**0**	**829**	**829**	**58%**	**312**	**365**	**0**	**86**	**1,152**	**9**
	2018	1,308	2,162	19%	74	829	902	72%	241	275	14	29	1,900	13
	2017	2,196	2,394	38%	145	2,218	2,364	64%	404	293	27	145	1,208	21
	2016	1,129	2,275	51%	69	1,234	1,302		229	487	14	0	2,548	0
	2015	1,029	2,333	51%	64	1,122	1,186		190	0	0	0		0
Brazil	**2019**	**0**	**84**	**0%**	**0**	**0**	**0**		**0**	**10**	**0**	**0**	**39**	**0.4**
	2018	0	208	0%	0	0	0		0	25	0	0	45	1
Bulgaria	**2019**	**0**	**31**	**0%**	**0**	**0**	**0**		**0**	**15**	**0**	**0**	**32**	**0.1**
China	**2019**	**0**	**54**	**0%**	**0**	**0**	**0**		**0**	**34**	**0**	**0**	**16.5**	**0.3**
	2018												6.6	
Spain	**2019**	**0**	**4,034**	**100%**	**0**	**0**	**0**		**0**	**0**	**0**	**0**	**1,359**	**20**
	2018	0	4,107	84%	0	0	0		0	293	0	0	1,694	13
	2017	0	2,853	0%	0	0	0		0	1,140	0	0	2,182	10.9
	2016	0	3,184	0%	0	0	0		0	1,397	0	0	1,733	
	2015	0	1,673	0%	0	0	0		0	484	0	0		
United States	**2019**	**29**	**65**	**0%**	**0**	**0**	**0**		**7**	**27**	**0**	**0**	**33**	**0.3**
	2018	17	78	0%	0	0	0		4	34	0	0	17	0
France	**2019**	**2,524**	**31,901**	**86%**	**0**	**13,108**	**13,108**	**18%**	**374**	**765**	**0**	**573**	**14,138**	**194**
	2018	2,812	30,510	86%	0	13,442	13,442	28%	260	782	0	554	15,263	427
	2017	1,938	26,434	80%	0	13,511	13,511	31%	112	757	0	434	16,342	144
	2016	5,390	26,489	75%	0	12,684	12,684		739	822	0	332	15,267	
	2015	2,935	28,318	1%	0	10,974	10,974		284	2,195	0	644		
India	**2019**	**640**	**10,157**	**100%**	**123**	**2,061**	**2,183**	**100%**	**162**	**0**	**31**	**0**	**4,627**	**1,775**
	2018	753	10,223	100%	164	2,173	2,337	100%	189	0	41	0	3,302.5	1,132
	2017	1,015	12,763	100%	144	1,995	2,139	100%	256	0	36	0	2,582	1,355
	2016	1,655	12,244	100%	277	1,792	2,070		417	0	70	0	2,687	
	2015	2,900	11,684	0%	467	2,206	2,673		653	9,581	115	1,696		

	RESOURCE CONSERVATION ✔							GREENHOUSE GAS EMISSIONS ✔					
	Offices and on-site data centres			On- and off-site data centres				Offices and on-site data centres		On- and off-site data centres		Business travel	Fugitive emissions
	Energy consumption		Proportion of electricity consumption from renewable sources ****	Energy consumption			Proportion of total electricity consumption from renewable sources	Greenhouse gas emissions: market-based		Greenhouse gas emissions: market-based		Air + road + train + hotels **	
Scope	Scope 1	Scope 2	Scope 2	Scope 1	Scopes 2 and 3	Scopes 1, 2 and 3	Scopes 2 and 3	Scope 1	Scope 2	Scope 1	Scopes 2 and 3	Scope 3	Scope 1
Unit	MWh	MWh		MWh	MWh	MWh		tCO₂e	tCO₂e	tCO₂e	tCO₂e	tCO₂e	tCO₂e
Italy 2019	381	569	100%	0	0	0		70	0	0	0	665.7	3
2018	159	578	0%	0	0	0		29	276	0	0	665.9	3
2017	131	606	0%	0	0	0		24	282	0	0	580	4.8
2016	132	802	0%	0	0	0		27	348	0	0	508	
2015	157	723	0%	0	0	0		29	288	0	0		
Poland 2019	16	532	100%	16	98	115	6%	3	**28**	3	84	163.3	0
2018	16	481	100%	16	99	115	9%	3	27	3	75	217.6	0
2017	24	804	0%	24	27	51		4	619	4	3	226	0
2016	21	657	0%	21	567	588		4	509	4	493	151	
2015	24	780	0%	24	361	385		5	502	5	282		
United Kingdom 2019	9,208	12,831	100%	0	4,951	4,951	93%	1,696	**0**	0	154	3,527.8	33
2018	8,565	13,712	60%	0	10,130	10,130	78%	933	2 016	0	929	3,907.3	32
2017	8,177	14,844	60%	0	11,412	11,412	79%	981	2 317	0	957	4,443	173
2016	4,563	10,840	72%	0	14,298	14,298		992	1 450	0	832	4,195	
2015	5,462	12,176	70%	0	14,595	14,595		1,067	1 844	0	1,037		
Singapore 2019	0	235	100%	0	0	0		0	**0**	0	0	88.8	0
2018	0	242	0%	0	0	0		0	96	0	0	99.4	0
2017	0	463	0%	0	0	0		0	202	0	0	89	0
2016	0	243	0%	0	0	0		0	111	0	0	91	
2015	0	79	0%	0	0	0		40	0	0	0		
Scandinavia 2019	0	1,945	100%	0	3,924	3,924	75%	0	**102**	0	279	1,180.3	0
2018	0	2,407	100%	0	4,032	4,032	82%	0	103	0	359	1,067.3	0
2017	0	2,451	100%	0	3,753	3,753	88%	0	74	0	201	704	0
2016	0	2,182	10%	0	3,598	3,598		0	849	0	699	496	0
2015	0	2,362	20%	0	3,841	3,841		0	90	0	26		0
Switzerland 2019	92	453	100%	0	390	390	100%	22	**1**	0	0	220.4	2
2018	111	355	100%	0	1,928	1,928	100%	25	7	0	0	278.3	2
2017	163	335	100%	0	431	431	100%	39	6	0	0	270	6
2016	97	339	100%	0	433	433		23	6	0	0	283	
2015	116	653	99%	0	1,103	1,103		9	23	0	144		

*   Africa includes Algeria, Cameroon, Côte d'Ivoire, Gabon, Morocco and Tunisia.

**   Data not taking into account emission reductions due to green business travel in Germany. Including these emission reductions resulting from green business travel, the amounts would be: 34,310 tCOe in 2019, 35,922 tCOe in 2018, 36,653 tCOe in 2017 and 35,316 tCOe in 2016.

*** Data not published in the 2015 and 2016 reports.

**** Joint ventures sites are only included from 2018.

The scope for the calculation of business travel indicators includes all entities over which the Group has operational control but does not include Groupe SAB or Sopra Financial Technology GmbH.

The scope for the calculation of energy indicators includes all entities over which the Group has operational control but does not include Groupe SAB or Sopra Financial Technology GmbH.

❙ RESOURCE CONSERVATION ✔

ENERGY CONSUMPTION ✔

(MWh)		Scope 1				Scope 2				Scope 3			Total Scopes 1, 2 and 3		
Year		2019	2018	2017	2015	2019	2018	2017	2015	2019	2018	2017	2019	2018	2017
Offices	Diesel, gas, biodiesel	14,543	13,488	13,330	12,623										
	District heating					3,933	3,705	3,803	63,563						
	Grid electricity					54,650	48,976	45,707							
On-site data centres	Diesel, gas, biodiesel	139	254	314											
	Grid electricity					8,924	14,768	17,035							
Off-site data centres	Grid electricity									16,621	18,059	16,421			
TOTAL ENERGY		**14,682**	**13,742**	**13,644**	**12,623**	**67,507**	**67,488**	**66,545**	**63,563**	**16,621**	**18,059**	**16,421**	**98,809**	**99,249**	**96,610**
TOTAL ENERGY CONSUMPTION PER EMPLOYEE *(MWH/EMPLOYEE)*													**2.2**	**2.3**	**2.4**
2019/2018 change in energy consumption per employee													**-4.3%**		

Scope 1: combustion of fossil fuels (petroleum, fuel oil and gas), use of biodiesel and emissions of coolants from air conditioning systems.
Scope 2: consumption of grid electricity and district heating in offices and on-site data centres.
Scope 3: consumption of grid electricity in off-site data centres.
The scope for the calculation of indicators includes all entities over which the Group has operational control (and therefore includes the NHS SBS and SSCL joint venture sites) but does not include Groupe SAB or Sopra Financial Technology GmbH. Joint ventures sites are only included from 2017.

WASTE ELECTRICAL AND ELECTRONIC EQUIPMENT (WEEE) ✔

Year	Quantity *(kg)*				Of which reused				Of which recycled				Of which incinerated			Of which sent to landfill sites		
	2019	2018	2017	2015	2019	2018	2017	2015	2019	2018	2017	2015	2019	2018	2017	2019	2018	2017
Germany/Austria	4,325	7,562	6,226	2,605	25.9%	11.8%	19.1%	98%	70.7%	84.3%	79.8%		3.3%	3.7%	1.1%	0.22%	0.23%	0%
Benelux	6,471	4,735	4,741		34%	79.6%	74.7%		61%	17.6%	18.6%		1%	1.4%	5.1%	4%	1.36%	1.6%
Spain	6,250	7,315	5,953	454	69.8%	55.7%	22.4%		30.1%	9.3%	66.5%		0%	0%	11.0%	0.11%	35%	0%
France	19,724	15,412	26,863	20,939	44.3%	68.8%	66.1%	43%	50.6%	27.5%	27.6%	56%	2.8%	2.1%	4.8%	2.3%	1.65%	1.6%
India	17,328	36,558	21,732	107,181	0%	0%	0%	75%	99.3%	99.7%	100.0%	25%	0.7%	0.3%	0%	0%	0%	0%
Italy	268	1,126	**	627	72.7%	76.4%	0%	80%	23.6%	19.7%	0%		1.9%	2.1%	0%	1.82%	1.71%	0%
Norway + Denmark	1,172	985	1,048	143,317	0%	25.2%	69.1%		92%	69.5%	30.9%		0%	0%	0%	8%	5.3%	0%
Poland	658	423	673	53	12%	12%	100%	100%	86.8%	86.7%	0%		1.2%	1.3%	0%	0%	0%	0%
United Kingdom	19,426	19,990	15,066	25,674	27.3%	13%	39.2%	100%	68.8%	82.4%	60.4%		4%	4.6%	0%	0%	0%	0.4%
Sweden	7,021	750	16	566	67.8%	68%	100%		31.9%	32%	0%		0%	0%	0%	0.3%	0%	0%
Switzerland	303	286	291	688	0%	0%	99.6%	0%	100%	100%	0.4%		0%	0%	0%	0%	0%	0%
TOTAL	**82,947**	**95,242**	**82,609**	**160,246***	**32.3%**	**24.9%**	**38%**		**64.7%**	**70.2%**	**58.2%**		**2%**	**1.8%**	**2.7%**	**1.06%**	**3.1%**	**0.7%**
Total/ employee *(kg/employee)*	**1.9**	**2.2**	**2.1**	**4.6**														

The scope for the calculation of indicators includes all entities over which the Group has operational control (and therefore includes the NHS SBS and SSCL joint venture sites) but does not include Groupe SAB or Sopra Financial Technology GmbH. Joint venture sites are included from 2017.
* Total based on data available.
** WEEE stored on site.

PAPER AND CARDBOARD WASTE BY COUNTRY ✔

Year	Quantity *(kg)*					Of which recycled					Of which incinerated				
	2019	2018	2017	2016	2015	2019	2018	2017	2016	2015	2019	2018	2017	2016	2015
Germany/Austria	21,868	67,076	47,530	43,565	45,214	100%	100%	100%	98%	98%	0%	0%	0%	2%	2%
Benelux	46,962	78,079	58,745	80,569		100%	100%	100%	75%		0%	0%	0%	25%	
Denmark	909	814	1,580	1,580	827	100%	100%	100%	100%	100%	0%	0%	0%	0%	
Spain	11,625	11,192	11,440	9,938		100%	100%	100%	100%		0%	0%	0%	0%	
France	109,168	94,192	71,804	60,342	96,269	84.8%	84.9%	87%	83.9%	89%	15.2%	15.1%	13%	16.1%	13%
India	12,506	13,415	14,025	28,410	27,217	100%	100%	100%	100%	100%	0%	0%	0%	0%	0%
Italy	2,800	2,668	2,730			100%	100%	97%			0%	0%	3%		
Norway	25,446	21,058	19,168	5,782	7,670	100%	100%	100%	100%		0%	0%	0%	0%	
Poland	2,731	2,440	2,553			97%	97%	97%			3%	3%	3%		
United Kingdom	173,509	159,746	200,382	131,839	146,900	100%	100%	100%	100%	100%	0%	0%	0%	0%	
Sweden	7,000	5,064	4,679		802	100%	100%	97%		100%	0%	0%	3%		
Switzerland	599	530	560	3,700	3,549	100%	100%	100%	100%	99%	0%	0%	0%	0%	
TOTAL	**415,122**	**456,274**	**435,196**	**365,725***	**328,448***	**96%**	**97%**	**97%**	**92%**		**4%**	**3%**	**3%**	**8%**	
Total per employee *(kg/employee)*	**9.4**	**10.5**	**10.8**	**10.0**	**9.4**										

The scope for the calculation of indicators includes all entities over which the Group has operational control (and therefore includes the NHS SBS and SSCL joint venture sites) but does not include Groupe SAB or Sopra Financial Technology GmbH. Joint venture sites are included from 2017.
* Total based on data available.

PURCHASES OF CERTIFIED PAPER FROM SUSTAINABLE SOURCES BY COUNTRY ✔

Year	Total paper purchased (kg)			Percentage of paper from sustainable sources			Paper purchased per employee (kg/employee)		
	2019	2018	2017	2019	2018	2017	2019	2018	2017
Germany/Austria	3,216	3,771	4,946	89%	93%	81%	1.09	1.40	2.11
Benelux	4,067	3,505	2,941	100%	95%	100%	4.14	3.44	2.81
Spain	7,861	5,875	8,208	70%	70%	70%	1.88	1.45	2.30
France	55,268	57,077	66,747	48%	26%	70%	2.89	3.05	3.69
India	8,296	8,429	7,897	71%	71%	100%	1.45	1.62	1.55
Italy	2,790	3,119	3,443	70%	100%	100%	2.76	3.22	4.05
Poland	575	903	646	100%	92%	100%	0.58	1.02	0.81
United Kingdom	11,173	13,835	13,942	79%	85%	84%	3.11	3.81	3.61
Scandinavia*	2,304	2,163	1,685	65%	68%	68%	1.01	1.05	1.23
Singapore	699	694	881	70%	70%	70%	5.42	5.14	7.53
Switzerland	624	1,127	1,073	76%	88%	89%	2.5	4.53	4.19
TOTAL	**96,873**	**100,498**	**112,409**	**60%**	**50%**	**76%**	**2.35**	**2.54**	**3.01**

Scandinavia includes Sweden, Norway and Denmark.
The scope for the calculation of indicators includes all entities over which the Group has operational control and does not include Groupe SAB, Sopra Financial Technology GmbH or the NHS SBS and SSCL joint venture sites.

WATER USE BY COUNTRY ✔

Year	Volume (cu. metres)		
	2019	2018	2017
Africa*	5,292	4,795	2,829
Germany/Austria	5,200	5,495	6,054
Benelux**	2,828	4,933	2,717
Brazil	650	341	N/A
Bulgaria	30	N/A	N/A
China	131	N/A	N/A
Spain	14,382	14,239	8,349
United States	499	N/A	N/A
France	74,874	86,855	55,760
India	63,433	63,903	136,948
Italy	4,205	3,666	2,585
Poland	4,254	3,465	3,106
United Kingdom	57,841	32,905	21,272
Scandinavia**	12,433	7,776	4,246
Singapore	705	511	356
Switzerland	228	285	258
TOTAL	**246,985**	**227,938**	**244,480**
Total (cu. metres/employee)	**5.5**	**5.2**	**6.0**

*   *Africa includes Algeria, Cameroon, Côte d'Ivoire, Gabon, Morocco and Tunisia.*
**   *Benelux includes Belgium, Luxembourg and the Netherlands.*
    The scope for the calculation of indicators includes all entities over which the Group has operational control and does not include Groupe SAB or Sopra Financial Technology GmbH.
    Joint ventures sites are only included from 2017.
*** *Scandinavia includes Sweden, Norway and Denmark.*

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CORPORATE RESPONSIBILITY

Report by the independent third party on the consolidated statement of non-financial performance presented in the management report

8. Report by the independent third party on the consolidated statement of non-financial performance presented in the management report

To the Shareholders,

In our capacity as an independent third party, member of the Mazars network and a Statutory Auditor of Sopra Steria Group, certified by COFRAC Inspection under number 3-1058 (scope of certification available on www.cofrac.fr), we hereby report to you on the consolidated statement of non-financial performance for the year ended 31 December 2019 (hereinafter referred to as the "Statement"), presented in the management report, pursuant to the legal and regulatory provisions of Articles L. 102-1, R. 225-105 and R. 225-105-1 of the French Commercial Code (Code de commerce).

RESPONSIBILITY OF THE COMPANY

The Board of Directors is responsible for drawing up a Statement complying with legal and regulatory provisions, including an overview of the business model, a description of the main non-financial risks, an overview of policies adopted in light of those risks and the results of those policies, including key performance indicators.

The Statement has been prepared in accordance with the Company's procedures (hereinafter "the Guidelines"), the significant elements of which are presented in the Statement or available on the website or on request from the Company's registered office.

Independence and quality control

Our independence is enshrined in the provisions of Article L. 822-11-3 of the French Commercial Code and the Code of Ethics governing the audit profession in France. We have also implemented a quality control system comprising documented policies and procedures for ensuring compliance with ethical and professional standards, and the applicable legal and regulatory requirements.

RESPONSIBILITY OF THE INDEPENDENT THIRD PARTY

On the basis of our work, it is our responsibility to formulate a reasoned opinion expressing limited assurance as to:

- the Statement's compliance with the provisions laid down in Article R. 225-105 of the French Commercial Code;
- the fair presentation of the information provided pursuant to Point 3 of Paragraphs I and II of Article R. 225-105 of the French Commercial Code, namely the results of policies, including key performance indicators, and actions relating to the key risks (hereinafter "the Information").

It is also our responsibility, at the entity's request and outside the scope of accreditation, to express a reasonable assurance opinion about whether the information selected by the entity (see Annex) has been prepared, in all material respects, in accordance with the Guidelines.

However, it is not our responsibility to issue an opinion on whether:

- the Company complies with other applicable legal and regulatory provisions, notably as regards the vigilance plan, anti-corruption measures and the prevention of tax evasion;
- products and services comply with applicable regulations.

NATURE AND SCOPE OF WORK

Our work described below was carried out in accordance with the provisions of Articles A. 225-1 et seq. of the French Commercial Code establishing the manner in which an independent third party should fulfil its engagement, with industry policy issued by the CNCC for this type of engagement and with International Standard on Assurance Engagements (ISAE) 3000, "Assurance Engagements Other than Audits or Reviews of Historical Financial Information".

The work we carried out enabled us to assess the Statement's compliance with regulatory provisions and the fair presentation of the Information:

- we familiarised ourselves with the business of all companies in the consolidated group, the overview of key labour-related and economic risks associated with that business and its effects as regards respect for human rights, anticorruption measures and the prevention of tax evasion, as well as with the resulting policies and the results of those policies;
- we assessed the suitability of the Guidelines in terms of their relevance, completeness, reliability, impartiality and comprehensibility, taking industry best practice into account where applicable;
- we checked that the Statement covers each category of disclosure stipulated in the third paragraph of Article L. 225-102-1 in relation to labour-related and environmental information, as well as respect for human rights, anti-corruption measures and the prevention of tax evasion;
- we checked that the Statement includes a reasoned explanation for the absence of any information required by the Subparagraph 2 of Paragraph III of Article L. 225-102-1;
- we checked that the Statement includes an overview of the business model and key risks associated with the business of all entities in the consolidated group, including, where relevant and proportionate, risks arising from its business relationships, products and services, as well as policies, actions and results, including key performance indicators;
- we checked that the Statement includes an overview of the information stipulated in the second paragraph of Article R. 225-105, where that information is relevant to the key risks and policies presented;
- we assessed the process used to select and validate key risks;

4 CORPORATE RESPONSIBILITY

Report by the independent third party on the consolidated statement of non-financial performance presented in the management report

- we enquired about internal control and risk management procedures put in place by the Company;
- we assessed the consistency of the results and key performance indicators selected with the key risks and policies presented;
- we checked that the Statement covers the consolidated group, i.e. all companies falling within the scope of consolidation in accordance with Article L. 233-16, within the limits specified in the Statement;
- we assessed the collection process put in place by the entity to ensure that the Information is complete and truthful;
- for the key performance indicators and other quantitative results (see Annex) we considered most important, we: Annex) we considered the most important, we:
  - used analytical procedures to check that the data collected had been properly consolidated, and that any changes in the data were consistent,
  - carried out detailed, sample-based testing to check that definitions and procedures had been properly applied and to reconcile data with supporting documents. This work was undertaken on a selection of contributing entities and countries (see Annex) and covered between 32% and 96% of the consolidated data used in the key performance indicators and results selected for these tests;
- we consulted source documents and carried out interviews to corroborate the qualitative information (actions and results) we considered most important (cf. Annex);
- we assessed the Statement's overall consistency based on our understanding of the Company.

We believe that the work we have undertaken, to the best of our professional judgement, provides a sufficient basis for our limited assurance conclusion. A higher level of assurance would have required more extensive verification procedures.

MEANS AND RESOURCES

Our work was carried out by a team of eight people between October 2019 and February 2020 and required a total of around 12 weeks.

We conducted around five interviews with individuals responsible for preparing the Statement, notably representing the Internal Control and Risk Management, Human Resources, and Sustainable Development Departments.

CONCLUSION

In the course of our work, we noted that the hours of long-term training delivered during the reporting period had only been partially recognised, resulting in an undervaluation in the number of reported hours.

Based on the work performed and apart from the aforementioned issue, we did not identify any material misstatement that would cause us to conclude that the statement of non-financial performance is not consistent with applicable regulatory provisions and that the Information, taken as a whole, is not presented fairly in accordance with the Guidelines.

REASONABLE ASSURANCE REPORT ON SELECTED CSR INFORMATION

Regarding the information selected by the Company and identified by the symbol ✔, we performed, at the request of the Company and in line with its proactive approach, the same types of procedure as those described in the "Nature and scope of work" section above for the key performance indicators and the other quantitative results that we considered to be the most important, but in a more in-depth manner, in particular with respect to the number of tests conducted.

The selected sample thus represents an average of 55% of the workforce and between 50% and 96% of environmental data identified by the symbol ✔.

We believe that these procedures enable us to express a reasonable assurance conclusion with respect to the information selected by the Company and identified by the symbol ✔.

CONCLUSION

In our opinion, the information selected by the Company and identified by the symbol ✔ has been prepared, in all material respects, in accordance with the Guidelines.

Paris La Défense, 9 April 2020

Independent third party

Mazars SAS

Bruno POUGET
Partner

Edwige REY
CSR & Sustainable Development Partner

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CORPORATE RESPONSIBILITY
Report by the independent third party on the consolidated statement of non-financial performance presented in the management report

❚ ANNEX

Key performance indicators and other quantitative results considered most important, and selection of contributing entities and countries subjected to detailed testing.

✔ Information reviewed on a reasonable assurance basis

Information	Entity/Country
■ Workforce by age bracket and type of employment contract ✔ ■ Workforce (FTE) ✔ ■ New hires ✔ ■ Turnover rate for staff on permanent contracts	■ France (Sopra Steria Group SA, Sopra HR Software, Sopra Banking Software, Beamap, Sopra Steria I2S, CIMPA SAS, Galitt, 2MoRO) ■ United Kingdom (Sopra Steria Ltd) ■ Norway (Sopra Steria AS) ■ Italy (Sopra Steria Group)
■ Number of hours and days of training ✔ ■ Average number of training days per employee ✔	■ France (Sopra Steria Group SA, Sopra HR Software, Sopra Banking Software, Beamap, Sopra Steria I2S, CIMPA SAS, Galitt, 2MoRO) ■ United Kingdom (Sopra Steria Ltd) ■ Norway (Sopra Steria AS) ■ Italy (Sopra Steria Group)
Percentage of employees with a disability ✔	■ France (Sopra Steria Group SA, Sopra Steria I2S, Sopra Steria Banking Software, Sopra Steria HR Software, CIMPA SAS, Galitt)
■ Energy consumption per employee ✔ ■ Energy consumption (offices and on-site data centres) ✔ ■ Energy consumption of data centres (on-site and off-site) ✔ ■ Proportion of electricity consumption for offices and on-site data centres provided by renewable energies ✔ ■ Greenhouse gas emissions from energy consumption (offices and on-site data centres) ✔ ■ Greenhouse gas emissions from energy consumption of data centres (on-site and off-site) ✔ ■ Greenhouse gas emissions – Scopes 1, 2 and 3 per employee	■ France (Sopra Steria Group SA, Sopra HR Software, Sopra Banking Software, Sopra Steria I2S, CIMPA SAS, Galitt, 2MoRO, OR System, Beamap, Cassiopae, Neospheres Consulting) ■ United Kingdom (Sopra Steria Ltd, Sopra Banking Software Ltd, Sopra HR Software Ltd, CIMPA Ltd, NHS Shared Business Services, SSCL, Cassiopae, Apak) ■ Spain (Sopra Steria España S.A.U., Sopra Steria Euskadi S.L., Sopra HR Software S.L., CIMPA PLM Espana SL, Sopra Financial Solutions Iberia S.L.)
■ Greenhouse gas emissions – Business travel ✔	■ France (Sopra Steria Group SA, Sopra HR Software, Sopra Banking Software, Sopra Steria I2S, Beamap, CIMPA SAS, Galitt, Tecfit, Neospheres Consulting, OR System, 2MoRO, Cassiopae) ■ Germany (Sopra HR Software GmbH, Sopra Banking Software GmbH, Sopra Steria GmbH, ISS Software GmbH, Sopra Steria Services GmbH, CIMPA GmbH, IT-economics GmbH, Cassiopae, Bluecarat) ■ Poland (Steria Polska)
■ Quantity of WEEE generated per employee ✔ ■ Proportion of waste electrical and electronic equipment given a second life ✔	■ France (Sopra Steria Group SA, Sopra HR Software, Sopra Banking Software, Sopra Steria I2S, CIMPA SAS, Galitt, 2MoRO, OR System, Beamap, Cassiopae) ■ India (Steria India Ltd, Cassiopae India PLC) ■ Germany (Sopra HR Software GmbH, Sopra Banking Software GmbH, Sopra Steria GmbH, ISS Software GmbH, Sopra Steria Services GmbH, CIMPA GmbH, IT-economics GmbH, Bluecarat)
■ Water consumption (offices and on-site data centres) ■ Water consumption per employee	■ India (Steria India Ltd, Cassiopae India PLC) ■ Spain (Sopra Steria España S.A.U., Sopra Steria Euskadi S.L., Sopra HR Software S.L., Sopra Financial Solutions Iberia S.L.)
■ Quantity of "green" paper purchased per employee ✔	■ France (Sopra Steria Group SA, Sopra HR Software, Sopra Banking Software, Sopra Steria I2S, CIMPA SAS, Galitt, 2MoRO, OR System, Beamap, Cassiopae) ■ Italy (Sopra Steria Group, Sopra HR Software)
■ Quantity of paper and cardboard waste per employee ✔ ■ Percentage of paper and cardboard waste recycled ✔	■ France (Sopra Steria Group SA, Sopra HR Software, Sopra Banking Software, Sopra Steria I2S, CIMPA SAS, Galitt, 2MoRO, OR System, Beamap, Cassiopae) ■ United Kingdom (Sopra Steria Ltd, Sopra Banking Software Ltd, Sopra HR Software Ltd, CIMPA Ltd, NHS Shared Business Services, SSCL, Cassiopae, Apak) ■ Norway (Steria AS)
■ Direct fugitive greenhouse gas emissions (offices and on-site data centres) ✔	■ France (Sopra Steria Group SA, Sopra HR Software, Sopra Banking Software, Sopra Steria I2S, CIMPA SAS, Galitt, 2MoRO, OR System, Beamap, Cassiopae, Neospheres Consulting) ■ India (Steria India Ltd, Cassiopae India PLC)
■ Greenhouse gas emissions arising from purchasing expenditure (calculated per million euros)	■ France (Sopra Steria Group SA, Sopra HR Software, Sopra Banking Software, Beamap, Sopra Steria I2S, CIMPA SAS, Galitt, 2MoRO, OR System, Beamap, Cassiopae) ■ United Kingdom (Sopra Steria Ltd, Sopra Banking Software Ltd, Sopra HR Software Ltd, CIMPA Ltd, NHS Shared Business Services, SSCL, Cassiopae)

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Glossary

Acronyms

- API: Application programming interface
- BPS: Business process services
- CNIL: Commission Nationale de l'Informatique et des Libertés (French data protection authority)
- COP21: 2015 Paris climate change conference
- DLP: Data loss prevention
- DRM: Digital rights management
- GAFA: Google, Apple, Facebook, Amazon ("Big Four" tech companies)
- GDPR: General Data Protection Regulation
- LPM: Military Planning Act ("Loi de programmation militaire", Law no. 2013-1168 of 18 December 2013)
- NIS: Network information system
- PaaS: Platform as a Service
- PLM: Product lifecycle management
- SaaS: Software as a Service
- SOC: Security operations centre
- UX: User experience

Alternative performance indicators

- **Restated revenue:** revenue for the prior year, expressed on the basis of the scope and exchange rates for the current year.
- **Organic revenue growth:** increase in revenue between the period under review and restated revenue for the same period in the prior financial year.
- **EBITDA:** this measure, as defined in the Universal Registration Document, is equal to consolidated operating profit on business activity after adding back depreciation, amortisation and provisions included in operating profit on business activity.
- **Operating profit on business activity:** this measure, as defined in the Universal Registration Document, is equal to profit from recurring operations adjusted to exclude the share-based payment expense for stock options and free shares and charges to amortisation of allocated intangible assets.
- **Profit from recurring operations:** this measure is equal to operating profit before other operating income and expenses, which includes any particularly significant items of operating income and expense that are unusual, abnormal, infrequent or not predictive, presented separately in order to give a clearer picture of performance based on ordinary activities.

- **Basic recurring earnings per share:** this measure is equal to basic earnings per share before other operating income and expenses net of tax.
- **Free cash flow:** free cash flow is defined as the net cash from operating activities, less investments (net of disposals) in property, plant & equipment, and intangible assets, less net interest paid and less additional contributions to address any deficits in defined-benefit pension plans.

Corporate responsibility

- **Sustainable Development Goals (SDGs)** defined by the United Nations: The Sustainable Development Goals (SDGs) defined by the United Nations are 17 global goals adopted by all of the organisation's member states in 2015 to be achieved by 2030. They cover many different areas, from protecting the planet to building a more peaceful world and ensuring that everyone can live in safety, security and dignity. These goals are part of a development programme that aims to prioritise support for the most vulnerable, especially children and women.

  https://sustainabledevelopment.un.org/sdgs

- **Materiality matrix:** a materiality analysis helps identify and prioritize the most relevant issues for a company and its stakeholders, and is presented in the form of a matrix, which plots these issues according to their importance to the company (x-axis) and to its external stakeholders (y-axis).
- **Materiality:** the degree of materiality determined reflects the extent to which an issue is capable of influencing the company's strategy, reputation or financial health.
- **Greenhouse gases (GHG):** Greenhouse gases are gaseous components that absorb infrared radiation emitted from the earth's surface and contribute to the greenhouse effect. The increase in their concentration in the earth's atmosphere is one of the factors causing global warming.
- **Science Based Targets initiative (SBTi):** Science Based Targets is an internationally recognised initiative offering mathematical models for identifying the environmental footprint of activities so as to be able to set ambitious greenhouse gas emissions reduction targets.
- **CDP:** non-profit organisation that runs the global disclosure system for investors, companies, cities, countries and regions to manage their environmental impact.
- **Task Force on Climate-related Financial Disclosures (TCFD):** a task force focused on climate-related financial disclosures, created as part of the G20 Financial Stability Board. The TCFD is one of the most important developments in the area of climate reporting by businesses.

- **Climate Disclosure Standards Board (CDSB):** the Climate Disclosure Standards Board is an international consortium of businesses and environmental NGOs that works in particular with the TCFD on these issues.

- **Scope 1 (of the GHG Protocol)**: covers direct greenhouse gas emissions arising from the combustion of fossil fuels (petroleum, fuel oil, biodiesel and gas) and the escape of coolants from air conditioning systems in offices and on-site data centres.

- **Scope 2 (of the GHG Protocol):** covers indirect greenhouse gas emissions associated with consumption of grid electricity and district heating in offices and on-site data centres.

- **Scope 3 (of the GHG Protocol):** covers indirect greenhouse gas emissions associated with consumption of grid electricity in off-site data centres and business travel.

- **Market-based:** method for calculating greenhouse gas emissions based on emissions factors specific to the energy source used.

Information relating to the Management Report

Reference texts		Business overview and comments on the financial year	Pages
CCom	L. 225-100-1, L. 232-1, L. 233-6 and L. 233-26	Objective, exhaustive analysis of the course of business, performance and financial position of the Company and Group; financial key performance indicators	152 to 217,224 to 250
CCom	L. 225-100-1	Non financial key performance indicators relating specifically to the Company's business, including disclosures on environmental and labour issues	100-149, 272
CCom	L. 233-6	Non financial key performance indicators relating specifically to the Company's business, including disclosures on environmental and labour issues	30
CCom	L. 232-1 and L. 233-26	Foreseeable developments in Company and Group affairs; major events occurring between the balance sheet date and the date at which the report was approved for publication	28 - 30, 214, 248
CCom	L. 225-100-1	Description of main risks and uncertainties to which the Company is exposed	37-44
CCom	L. 225-100-1	Use of financial instruments by the business: targets and policy pertaining to the management of financial risks and the Company's exposure to price, credit, liquidity, and cash flow risks	173-174
CCom	L. 225-102-2	Polluting and high-risk activities	N/A
CCom	L. 225-100-1	Internal control procedures	45-49
CCom	L. 232-1	Research and development activities	25
CGI	243 bis	Dividends distributed in respect of the past three financial years; amount of earnings distributed in respect of those years that is eligible for the 40% tax exemption	270

Reference texts		Statement of non-financial performance	Pages
CCom	R. 225-105-1	Business model	Integrated Presentation 8 – 9
CCom	L. 225-102-1, III and R. 225-105	Information on the manner in which the Group takes into account the social and environmental consequences of its business activities: ■ Overview of the main risks related to its business activities ■ Overview of policies adopted by the Group to prevent, identify and mitigate those risks ■ Results of those policies, including key performance indicators	Chapter 2 37 - 44 Chapter 4 107 to 131 Chapter 8 272
CCom	L. 225-102-1, III and R. 225-105, II-B-1° and 2° L. 225-102-4	Information on anti-corruption measures and the prevention of tax evasion	129 à 130
		Information pertaining to respect for human rights	102
		Vigilance plan	131 - 132

Reference texts		Other information	Pages
CCom	L. 225-184	Options granted, subscribed for or purchased during the financial year by the company officers and each of the Company's top ten non-officer employees; options granted to all employees, by category	83-87, 176-178,
CCom	L. 225-185 L. 225-197-1	Conditions for the exercise and holding of options by senior executive officers; conditions for the holding of free shares allotted to senior executive officers	84 - 94, 176-178
CCom	L. 441-6-1 and D. 441-4	Information on payment times of the Company's suppliers and clients	249 - 250
CGI	Article 39-4	Total amount of non-deductible expenses	232
CMF	L. 621-18-2	Transactions by senior executives and related persons involving Company securities	265
CCom	L. 225-102-4	Vigilance plan	131 - 132
CCom	L. 225-211	Breakdown of purchases and sales of treasury shares over the financial year	265-266
CCom	L. 228-90	Potential adjustments for securities conferring access to the share capital in the event of share buybacks or financial transactions	262-263