

Human rights policy

Devoteam

“With our “Tech for People” vision, we want to make a tangible impact for our clients in promoting responsible technology for a better future.

Doing IT for good was already our goal when we launched Devoteam about 30 years ago. Now it’s part of our vision: “Tech for People” and our mission to imagine and realise better change.

Only fulfilled & happy tech talents will be able to create a positive future. This is our duty to offer them opportunities of personal engagement and infinite career possibilities. Our Employee Value proposition, which is the promise we have towards our employees, is based on 5 perks, 5 values and 1 commitment to a sustainable future.

We want to offer the best conditions to work to all our employees regardless of their gender, social, cultural or any specific background and to promote Human Rights as a whole in line with our 15+ years of commitment to the United Nations Global Compact.”

*Godefroy & Stanislas de Bentzmann
Co- CEOs Devoteam*

Document History

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About our organisation

Devoteam is a leading consulting firm focused on digital strategy, tech platforms and cybersecurity.

By combining creativity, tech and data insights, we empower our customers to transform their business and unlock the future.

With 25 years' experience and 10,000 employees across Europe, the Middle East and Africa, Devoteam promotes responsible tech for people and works to create better change. Devoteam Group achieved yearly revenues of over €1 billion in 2022.

www.devoteam.com

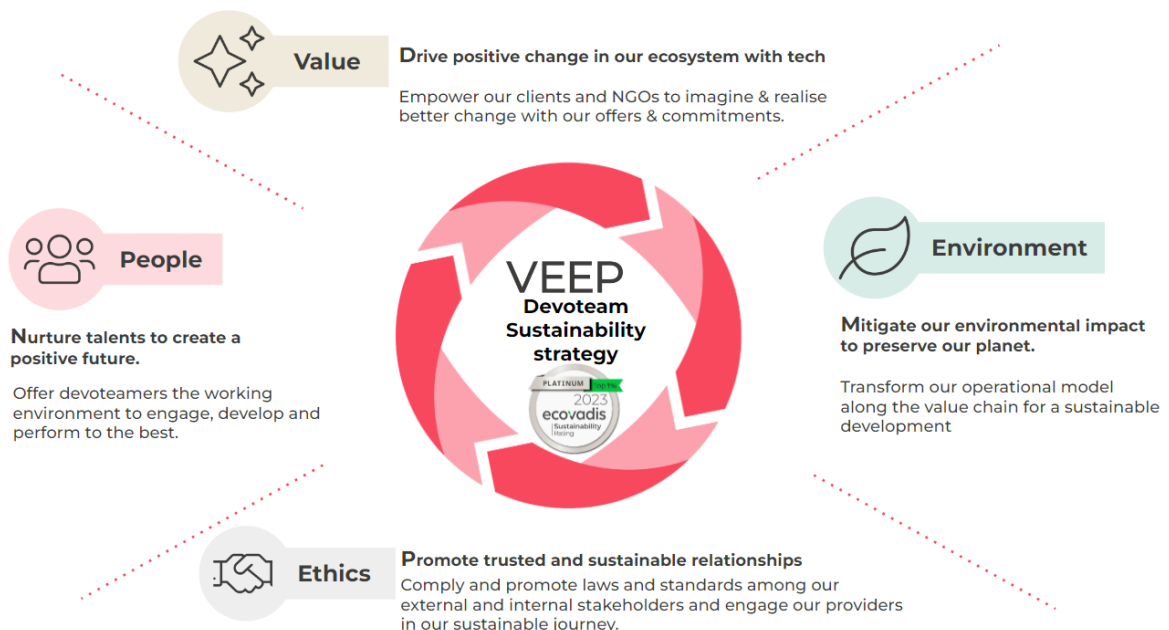
Scope of the policy

This policy applies to all employees of Devoteam's Group around the world: Devoteam SAS and all its subsidiaries.

Devoteam Sustainability strategy

VEEP by Devoteam represents Devoteam's CSR commitments in terms of

- Value offered to its ecosystem,
- Environment, to reduce its impact,
- Ethics to establish the values and lines of conduct applicable to employees and prevent their violation,
- People, to ensure the respect and development of all our stakeholders.



Devoteam Employee Value Proposition (EVP)

We firmly believe in a positive human future in a technology-driven world. At Devoteam, economic, social and environmental responsibility cuts across everything we do and is embedded in our processes as good business practice.

Our EVP offers to each talent Infinite possibilities to become a digital leader. With CSR at the heart, it is based on our 5 values (respect, frankness, ambition, entrepreneurship, collaboration) and offers 5 perks to our employees: friendly worklife, supportive management, impactful projects, connections with amazing people, and fast career development.



Our international commitments

Within the framework of its activities, the Devoteam Group undertakes to respect :

- [The 10 principles of the United Nations Global Compact](#) (Devoteam has been committed since 2007),
- [The United Nations Universal Declaration of Human Rights](#),
- [The International Labour Organisation conventions](#),
- [The OECD Guidelines for Multinational Enterprises](#),
- [The General Data Protection Regulation](#)
- Local laws and regulations in operating country
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As a signatory above organisations, Devoteam openly shows its support for:

- collective bargaining between employers and staff representative bodies, as well as freedom of association;
- the elimination of any form of forced or compulsory labour;
- the refusal to use child labour;
- the employer's involvement in the career development of the employees, particularly through training.

Respectful Employment practices

Devoteam believes respect for the dignity, rights and ambitions of all people is a cornerstone of business excellence. We treat all our people with dignity and respect and provide a productive working environment free from discrimination, victimisation, coercive pressure, bullying and harassment, and we treat all employees equitably, regardless of local economic conditions, traditions and cultures.

Every worker has a right to compensation for a regular work week that is sufficient to meet the worker's basic needs and provide some discretionary income. We are committed to offering 100% of our people and suppliers worldwide, a minimum living wage, in accordance with the local laws, regulations and standard of living.

To do so, Devoteam :

- Respect local collective agreements, local laws and regulations thanks to each country manager, who manages their own compliance with the assistance of the Group's compliance teams. Seasonal audits are carried out in each locality to ensure that there are no malfunctions, non-compliances or processes to be implemented.
- Ensures that our suppliers respect our values through processes presented in the "Supplier selection" section.

Diversity and Inclusion

The Devoteam Group works for equal opportunities, merit-based promotion of its collaborators and does not tolerate any form of discrimination against its Employees, customers or any person having a relationship with the Devoteam Group, based on criteria such as race, skin colour, beliefs, religion, nationality, ethnic origin, age, gender identity, sexual orientation, civil status, disability (all our positions are open to disabled people) or political opinion.

We believe that diversity contributes to the creativity, dynamism, and excellence of our organisation.

Devoteam leads actions globally and locally with three main ambitions, and monitors their outputs on a regular basis:

- Increase diversity in the IT market and the number of talents choosing tech careers, for instance with actions through the Devoteam Foundation or programmes to promote Women in Tech careers.
- Increase the number of talents from all horizons within Devoteam, implementing a fully transparent recruitment process
- Ensure equal treatment for all Devoteamers especially with Eagle For Value, the Group operating model, offering a clear vision of career development, certification, and salary grids.

Health and safety

Preserving, promoting and guaranteeing the health and safety of its employees on a daily basis is a priority commitment of Devoteam Group.

Devoteam has a [Health and Safety policy](#) applicable to all its subsidiaries, to promote caring and sustainable working conditions based on human responsibility

Anti slavery Statement

At Devoteam, we prize our ethical approach and are committed to complying with all laws and regulations applicable to our business, including taking steps to ensure that there is no human trafficking or slavery in our supply chain or within any part of our business.

We believe the nature of what we do at Devoteam means that the risk of human trafficking and slavery occurring in our business or in our supply chains is low. However, our continuing commitment to combating human trafficking and slavery is reflected in our policies and code of conduct which require all Devoteam people to act ethically and with integrity in all our business relationships.

Business partners must not use forced labour, whether in the form of prison labour, indentured labour, bonded labour or otherwise. No employee may be compelled to work through force or intimidation of any form, or as a means of political coercion or as punishment for holding or expressing political views.

Code Of Conduct

Our [Code of Conduct](#) supports our commitment to respect human rights, including setting out our expectations on diversity and inclusion, equal opportunity and freedom from abuse or harassment in the workplace, as well as respect for the environment and its impacts on human Well-being.

It complies with our environmental, social, and governance (ESG) strategy.

All Devoteamers - with Top Management leading the way - are required to adhere to this Code of Conduct in all of their interactions with our stakeholders, i.e., other employees, customers, partners, suppliers, candidates etc.

Supplier selection

Devoteam supports sustainable procurement methods, whether prescribed by legislation or through our own policies. As well as the traditional procurement benchmarking criteria of price and quality, we consider four criteria in the procurement decision-making process, aligned with our VEEP sustainable strategy: Value, Environment, Ethics, People.

We choose suppliers on the basis of fair and transparent principles and we expect all our suppliers to abide by our sustainable procurement charter.

Our business partners are expected to pay at least the minimum wage or the appropriate prevailing wage, whichever is higher, comply with all legal requirements on

wages, and provide any fringe benefits required by law or contract. Our policy is to place contracts with suppliers who adopt sustainable practices in line with appropriate international and local guidelines and standards.

We assess our suppliers' compliance with these standards via our supplier pre-qualification questionnaire which includes mandatory sections on compliance with laws and regulations, including the Modern Slavery Act, and disclosure on Human rights labels like Ecovadis.

Feedback and Whistleblowing

We encourage people across Devoteam to take active responsibility for improving our performance, whether through enhancing working practices or drawing attention to behaviours or other issues that give them concern.

As part of the Devoteam Group, all employees are required to comply with any whistle-blowing legislation applicable in their country. As Devoteam believes that these legislations encourage feedback and suggestions, the Group has introduced procedures and mechanisms to create a culture that allows people to speak up with confidence and in good faith in the expectation of being heard. Devomood, our bi-annual employee satisfaction and engagement survey at group level, is a compass for us so we can detect which areas should be improved and set up plans accordingly.

An [ethic alert line](#) is available to all our internal and external stakeholders on Devoteam website. The Group Ethics Committee, composed of the Chief Talent & Learning Officer, the Heads of the Internal Control, the Group General Counsel, the Quality and CSR Directors, and the Head of Social Affairs, considers and responds to each alert, involving the appropriate authorities if necessary. This committee tests the procedure at least once a year.