

Devoteam

Suppliers code of conduct

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Foreword

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 has been engaged in promoting and meeting the [17 UN Sustainable development goals](#), for which we cannot work alone. Rather we need to immediately and collectively take significant actions. Collaboration with other corporations, the public sector, and nongovernmental organizations is a key step in driving positive change. In connection with each Party's commitment to addressing sustainability challenges, the Parties acknowledge their common intention in the fulfillment of their obligations.

This charter is intended as a reminder of Devoteam commitments and all of its subsidiaries. With their signatures, suppliers commit to following the same principles as Devoteam.

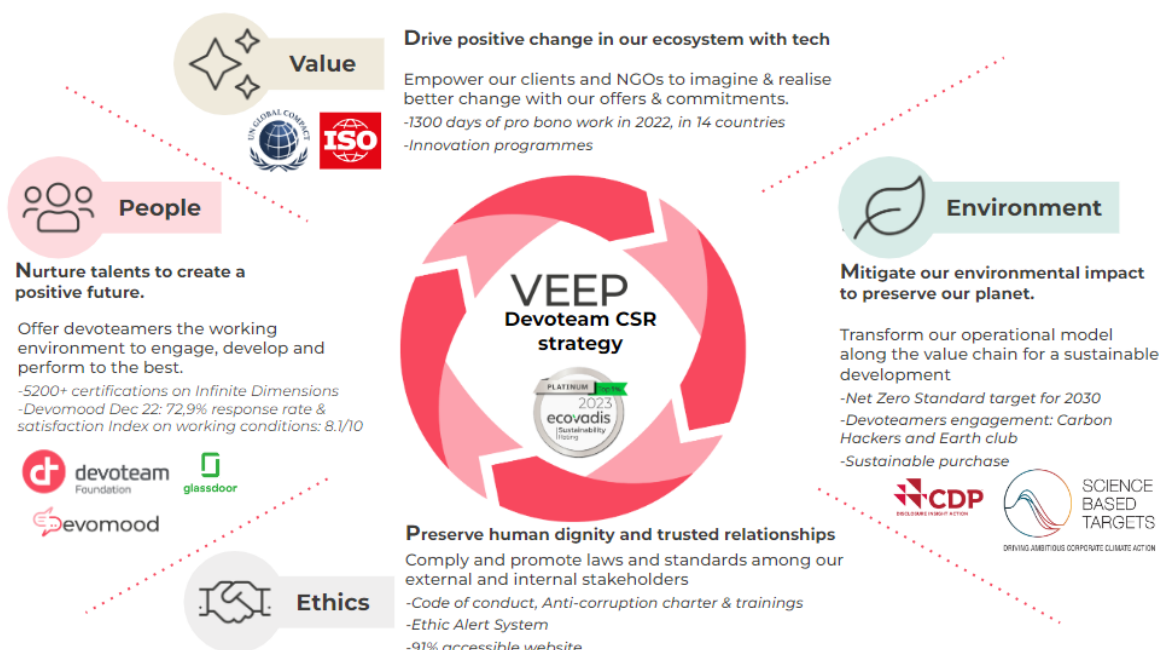
Additionally to this charter, the supplier commits to filling a questionnaire, on a yearly basis, to report its own commitments and communication on progress (COP)

The word "supplier" refers to any co-contractor, be they a provider of goods or services, a subcontractor, a co-contractor, an employee of a company, or a freelancer.

1. Devoteam commitments

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

- Value offered to its ecosystem,
- Environment, to reduce its impact,
- Ethics to ensure compliance and prevent corruption
- People, to ensure the respect and development of all our stakeholders.



Details on Devoteam's commitments and achievements are available in its [annual report](#) and [website](#), and are summarized in each of the following chapters of this charter.

Devoteam expects its suppliers to commit to the 4 dimensions of its CSR policy.

Every purchase complies with these commitments and is aligned with Devoteam's values: Respect, Frankness, Ambition, Entrepreneurship, and Collaboration.

Details on our values are available on [Devoteam's website](#).

2. Supplier Code of conduct

Value

As part of its activities, Devoteam undertakes to respect:

- [The 10 principles of the United Nations Global Compact](#),
- [The United Nations Universal Declaration of Human Rights](#),
- [The International Labour Organisation conventions](#),
- [The OECD Guidelines for Multinational Enterprises](#),
- Local laws and regulations in operating country

In all circumstances, the supplier declares that:

- It respects the guiding principles of the aforementioned organisations;
- It is in compliance with the legislation in force in their country, especially in relation to the health and safety of workers;

Environment

For Devoteam and its suppliers, the environment is a key stakeholder and we aim at reducing our impact on it.

Our main actions are focused on:

- **Climate change: Devoteam** has defined an ambitious target to become Net-Zero by 2030 and has committed to Science-Based target initiative (SBTi) to contribute in reducing its emissions and keep global temperature rise to 1.5°C or less.
- **Waste:** Devoteam is particularly engaged in increasing its assets lifespan, as well as repairing, reusing and recycling WEEE (Waste from Electrical and Electronic Equipment).

The supplier declares that:

- It complies with the environment-related standards that are applicable to its activities, and observes environmentally ethical practices in all circumstances;
- It adheres to the principles of environmental protection and controls the consequences of its activity on the environment pursuant to the WEEE and RoHS directives, and especially that It handles all hazardous waste responsibly (identification, storage, disposal, treatment using waste tracking slips), in accordance with local laws;
- It implements management and improvement policies for its industrial processes, in order to limit their environmental impact throughout the life cycle of its products, with a specific focus on GHG emissions.

Ethics

Fair Business

Devoteam ensures that its activities are carried out in accordance with the principles of business ethics by refraining from any form of bribery, tax evasion or anti-competitive agreements.

Economic sanctions compliance policy

Devoteam strives to conduct its business with integrity and in compliance with all applicable economic restrictions, the violation of which may result in severe financial and criminal penalties

No business relationship, for whatever reason, is permitted with any person located in, based in or ordinarily residing in any of the following countries or regions: Crimea, Luhansk, Donetsk, Cuba, Iran, North Korea, Russia, Syria.

In addition, the following countries have been labeled as “high risk”, and any potential business relationship with them is subject to a specific and mandatory assessment: Belarus, Central African Republic, Democratic Republic of Congo, Ethiopia, Hong Kong, Iraq, Lebanon, Liberia, Libya, Myanmar, Sudan, Venezuela, Yemen and Zimbabwe.

Fighting money laundering, terrorist financing, and tax evasion

Devoteam actively seeks to prevent money laundering, terrorist financing, and tax evasion. Devoteam commits not to pursue, under any circumstances, any commercial relationship that could place Devoteam in a risky situation with regard to the regulations in force vis-à-vis the fight against money laundering.

Information security and protection of personal data

Devoteam pays the highest importance to

- information security, in particular the availability, integrity, confidentiality and traceability of data;
- the protection and confidentiality of personal data, in accordance with the provisions of the European Regulation "on the protection of natural persons with regard to the processing of personal data and on the free movement of such data" (EU GDPR), as well as the applicable national regulations relating to the protection of personal data.

The supplier declares that:

- It complies with all applicable antitrust and competition laws, both nationally and internationally
- It does not carry out activities, directly or indirectly, in or with a country which is subject to international restrictions or sanctions
- It put in place all the necessary procedures to ensure control of each financial transaction with Devoteam and its third parties
- It is compliant with security and Data protection legal framework

People

Devoteam respects and promotes national laws and international labour conventions of the International Labour Organisation by openly showing its support for:

- collective bargaining between employers and staff representative bodies, as well as freedom of association
- respect for the freedom of association and recognition of the right to collective bargaining;
- 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

Diversity/no discrimination

Devoteam believes that diversity contributes to the creativity, drive and greatness of an organisation. Devoteam does not tolerate any form of discrimination against our collaborators, our customers, or any person maintaining a relationship with Devoteam, in particular, of racial origin, skin colour, beliefs, religion, nationality, ethnic origin, age, gender, sexual orientation, marital status, disability or political opinion.

Health, safety and well-being at work

Devoteam promotes well-being at work and is committed to safeguarding its employees' physical and mental health, as well as their safety.

Devoteam prohibits any sexism or act of sexual or moral harassment towards an employee, customer or any third party who is associated with Devoteam.

The supplier declares that:

- It complies with the social regulations of the country in which they are located especially:
 - Guarantee the minimum living wage and conventional minimum remuneration
 - comply with the provisions in force relating to working hours
 - respect the right of their employees to freely join – or abstain from joining – workers' organisations of their choice and to undertake collective bargaining permitted by law
- It do not to use in any way, directly or through their own subcontractors or suppliers: forced or compulsory labour, irregular labour, child labour
- It is opposing all forms of discrimination
- It prohibits any sexism or act of sexual or moral harassment
- It takes the necessary measures to ensure occupational health and safety as part of a prevention plan for their permanent and temporary employees, employees of their customers and users of their products, employees (permanent and temporary) of their own suppliers and subcontractors, as well as populations located near their infrastructure.

3. Right to information and Audit

To demonstrate their compliance with the commitments, Devoteam's suppliers undertake to respond to a Devoteam questionnaire on CSR topics. All supporting documents (such as the Ecovadis Certification) must be sent to Devoteam by email to achat@devoteam.com.

In order to monitor compliance with the provisions of this charter and the responses to the CSR questionnaire, Devoteam may – at its own expense, by its own means or by resorting to an independent third party – carry out an audit, on site or by means of photographs/documentation, having given the supplier ten (10) calendar days' notice.

The subcontractor undertakes to provide reasonable assistance and to act diligently for the purpose of carrying out this audit. The costs borne by the subcontractor in this context will remain at their expense if a breach is noted.

4. Non-respect of these rules of conduct or the applicable laws

In the event of proven misconduct on the part of the supplier:

- The supplier undertakes to take the necessary corrective measures and to inform Devoteam of the remedial actions until their completion within a period to be defined in agreement with Devoteam;
- Devoteam reserves the right to:
 - prohibit suppliers from disclosing one or more of the group's trademarks or names by way of reference; and/or
 - terminate all or part of the business relationship with Devoteam's suppliers for breach of contractual provisions.

In the event of proven misconduct on the part of Devoteam, an alert line has been set up for all Devoteam stakeholders, including its suppliers:
<https://www.devoteam.com/ethics-alert-system/>

Any ethical, social or security alert can be reported through this channel. If necessary, an ethics alert committee will meet to deal with the situation with the competent authorities.

5. Contacts

Devoteam's suppliers undertake to provide a single point of contact for these matters to Devoteam as soon as the contract is signed.