Code of Conduct

Sopra Steria Benelux

Version 1.00

September 1, 2024

Owner: Board of Directors

Approved by: Board of Directors Sopra Steria Holding B.V.

Ringwade 1 NL-3439 LM Nieuwegein



1. INTRODUCTION

1.1. Colophon

| Owner of this document:Board of DirectorsAdministrator:Company Secretary (Benelux) | |
|--|---|
| In this document, the following definitions apply: | |
| Benelux Group: | Sopra Steria Benelux |
| Board of Directors: | the Board of Directors of Sopra Steria Holding B.V. |
| Code of Conduct: | the Group Code of Conduct, the Group Code of Ethics, the related Group policies, the Benelux Group guidelines and policies (as referred to in Appendix 1) |
| Group: | Sopra Steria Group SA (France) |
| Sopra Steria Benelux: | Sopra Steria Benelux NV, Sopra Steria Holding B.V. and the subsidiaries of these entities |

1.2. Scope

The Code of Conduct applies to each and every one of us, without exception. It applies to all directors, managers, staff, and company officers of Sopra Steria Benelux and the companies under its control.

2. Code of Conduct

The Code of Conduct covers the Group Code of Conduct, the Group Code of Ethics, the related Group policies, the Benelux Group guidelines and policies (as referred to in **Appendix 1**) and is made available on the intranet.

All staff members, regardless of their role and geographic location, and all company officers, are personally responsible for implementing the values and principles set out in this Code of Conduct and



following the rules specified. This Code of Conduct is disseminated across the entire Benelux Group, including via the intranet and at training sessions.

Managers have a particularly important role concerning their teams in terms of upholding the Code of Conduct, as they must exemplify its values, promote awareness, follow the rules, and ensure that others follow the rules.

Therefore, everyone is responsible for reading and taking on board this Code, and demonstrating judgement and common sense when responding to the various situations that may arise.

APPENDIX 1: Code of Conduct

- the Group Code of Conduct
- the Group Code of Ethics
- the related Group policies
- the Benelux Group guidelines and policies

