

Speak Up Policy Sopra Steria Benelux

September 2024

1. General

This policy applies to **Sopra Steria Benelux NV, Sopra Steria Holding B.V. and their respective subsidiaries, together hereinafter referred to as: “Sopra Steria Benelux” or “Company”**.

We encourage everyone who carries out work for the Company – or collaborates with us – to report any instances of suspected misconduct, such as an infringement of laws or regulations, the Code of Conduct or the accompanying policies. We take all reports seriously. Where necessary, we will take action. We will not allow those who express concerns, or report a case of misconduct, to experience adverse consequences for their actions in the performance of their work.

2. Introduction

We greatly value honesty, transparency and integrity. The Code of Conduct and its accompanying policies are a key part of this. We want to ensure that anyone who undertakes work for us, or collaborates with us, respects and abides by our values. If this is not the case, we would like to hear about it as soon as possible, to enable us to take steps towards improving the organization. It is your role to help us with this.

In our company, we want to create a climate in which you feel free to express concerns and to report any suspicions you may have of misconduct. It will not always be clear if a particular action or behavior is a breach of laws or regulations, the Code of Conduct or the accompanying policies. However, the ‘moral compass’ in all of us may send warning signals. In these cases, we would prefer that you share your concerns rather than keep them to yourself.

This Speak Up Policy explains how and where you can make a report.

3. When can you make a report on the basis of this Speak Up Policy?

In the first instance, this policy is for internal use. Everyone who carries out work for Sopra Steria Benelux, regardless of contract type (temporary, permanent, agency workers, interns, external and hired-in staff) may make a report. Therefore, you may also do so if you have been seconded to a client by Sopra Steria Benelux.

Our business partners (such as suppliers and clients) can make use of this Speak Up Policy if they have a suspicion of misconduct involving someone who works for (or with) Sopra Steria Benelux. They can contact the Benelux Compliance Officer(s) directly; business partners may not use the (internal or



external) Trusted Persons or the external SpeakUp line (see below).

A report may relate to many different types of misconduct, or a suspicion of these:

- Discrimination
- Bribery
- Conflicts of interest
- Inside information
- Improper use of company resources
- Fraud
- Careless handling of confidential information
- Unfair competition

We urgently ask everyone to report any suspicions of misconduct. If you, as a Sopra Steria Benelux employee, think that criminal offences may have been committed (such as fraud, bribery, theft or unfair competition) you even have an obligation to report this.

This Speak Up Policy is not intended for expressing complaints about conditions of employment. Furthermore, this Speak Up Policy does not replace the existing procedures for individual complaints, for example with regard to HR assessments.

4. Who can you approach?

The first step

In the first instance, we hope that you, as an employee of our organization, will feel free to share any concerns you may have about questions that fall within the scope of this Speak Up Policy with your line manager. This is also the best way to create a positive, open working environment throughout the organization.

The next steps

If for whatever reason, you would prefer not to talk to your line manager, you can contact:

- Your local Compliance Officer
- Your local Internal Trusted Person
- The external Trusted Person
- The external Speak Up line

Local Internal Trusted Person(s) (for the Netherlands and for Belgium/Luxembourg)

You can approach your local Trusted Person to report misconduct (including inappropriate behaviour) or a suspicion thereof. The Trusted Person will keep your identity confidential. He/she can



pass on any suspicions you have reported to the local Compliance Officer.

- You can find contact information for your local Trusted Person on the Intranet.

Local Compliance Officer (for the Netherlands and for Belgium/Luxembourg)

You can also approach your Local Compliance Officer to report misconduct or a suspicion thereof.

- You can find contact information for your local Compliance Officer on the Intranet. Our business partners will find the contact information on our website.

External Trusted Person

Furthermore, you have the option to approach an external Trusted Person.

- You can find contact information of the external Trusted Person on the Intranet.

External SpeakUp line

If it is impossible or undesirable to report misconduct or a suspicion thereof through the channels outlined above, you can make use of the external and anonymous SpeakUp line. You can make a report to them either over the phone or on the internet, in your native language (Dutch or French) or in English. The SpeakUp line is a free and confidential service that is available all day.

“In our company, we want to create a climate in which you feel free to share your concerns and to report any suspicions of misconduct.”

- You can find more information about approaching the SpeakUp line on the Intranet.

Whether you share your concerns in person, or by email, letter or phone, you should always communicate as much detailed information as possible. For example:

- The background and your reason for reporting
- Data, places, and if possible people’s names and other concrete information
- Examples of the behavior in question
- Any documents that may be relevant to the situation

It is also good to mention whether you have already discussed the situation with someone, and if so, with whom and when. We can only follow up a report if we have sufficient leads to enable further investigation.

5. How are reports handled?



If you make a report to the local Compliance Officer, you will receive a confirmation of receipt within 7 days. In cases where the (internal or external) Trusted Person has forwarded your report to the local Compliance Officer, you will also receive – via the Trusted Person – a confirmation within 7 days.

If you make a report via the external SpeakUp line, the report will be forwarded anonymously to the (Benelux) Compliance Officer in the Netherlands. (If the report relates to the behavior of the Compliance Officer, the report will be sent to the executive member(s) of the Board of Directors).

In the first instance, the Compliance Officer(s) will assess if there is a basis for further investigation. They may decide not to proceed with further investigations after a report has been made. This will happen if the matter is covered by a different regulation, or if there is insufficient information available (and there is no opportunity to collect further information).

Furthermore, no investigation will be initiated if the report is deemed to have been made with malicious intent. The Compliance Officers report periodically on the matters received, including those not investigated. Qualifying matters are investigated immediately by the local Compliance Officer. In investigations, the Compliance Officers may call for help from certain Sopra Steria employees as well as external parties (e.g. lawyers or external accountants).

When it has been determined that there is a question of non-compliance with laws or regulations, the Code of Conduct or policies, the Compliance Officer makes a proposal to the (executive members of the) Board of Directors as regards measures to be taken; these could be disciplinary measures, but could also be measures designed to prevent repetition. The Compliance Officers see to it that the measures approved by the (executive members of the) Board of Directors are implemented.

As the reporting party, you will hear from the Compliance Officer(s) whether misconduct has been determined. We will be unable to provide you with further details, due to the regulations governing protection of confidential information and privacy.

Handling a report may take some time. If it takes longer than eight weeks for the outcome to be known, you will receive a message outlining how much longer the investigation is expected to take.

6. How do we protect your anonymity?

We handle all reports confidentially. If you make a report to your local Compliance Officer, they will of course know your identity. If you wish to remain completely anonymous, you can approach the external SpeakUp line.



The Compliance Officers may not reveal your identity without your permission, except:

- If there is a legal obligation to reveal your identity;
- If it becomes apparent that the report has not been made in good faith;
- If it is necessary on important public interest grounds.

If the investigation into a report is hindered by your anonymity, we will still ask your permission to disclose your identity. If your identity is disclosed, then it will only be revealed to the people who need this information for the purpose of (handling of) the report.

6. No negative consequences

If you make a report in good faith, you will be protected, and you will experience no negative consequences of this in the performance of your work. If you feel that you are experiencing adverse effects, please make this known through one of the channels set out in this Speak Up Policy so that we can take the necessary steps to address this.

You may have taken part in the undesirable behavior you are reporting. When handling a report of this kind – and when deciding on possible disciplinary measures – we will bear in mind that you were the person who brought the matter to light.

We assume that you are making a report in good faith. If further investigation reveals that no misconduct has taken place, you do not need to worry that measures will be taken against you, provided that you have acted in good faith.

7. Keeping involved person(s) informed

Person(s) who, according to the report, are involved in the relevant matter will be informed about the report. This will be done as soon as possible, unless this would seriously hinder the investigation.

8. Privacy

When processing personal data within the framework of this Speak Up Policy, we will act in strict accordance with the relevant rules.



9. Implementation

The (executive members of the) Board of Directors will ensure that this Speak Up Policy is introduced. Managers will ensure that their staff are familiar with this Speak Up Policy.

10. Evaluation and reporting

As part of the Business Management Review, an annual evaluation of this Speak Up Policy will take place. The Benelux Compliance Officer reports on a quarterly basis to the (executive members of the) Board of Directors on the reports received, the nature and status of investigations and their outcomes.

