

Guidelines and policies

Related to the 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.

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1. INTRODUCTION

1.1. Colophon

Owner of this document: Board of Directors

Administrator: 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
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 and organization

These guidelines and policies apply 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.

We attach great importance to honesty, transparency and integrity. We aim to be a sincere and trustworthy partner and to carry out our activities in a responsible manner. We will comply with the legal and regulatory requirements, as well as with the Code of Conduct and the accompanying policies. This means that we will comply with these rules not only literally but will also act in their spirit.

The Benelux compliance function is organized as follows:

- The Benelux Compliance Officer: contact person for the Code of Conduct and reports to the Executive (Board of) Directors.

The Benelux Compliance Officer is supported by:

- The Deputy Compliance Officers: one contact person for Belux and one in the Netherlands (who can replace the Benelux Compliance Officer in case of absence)
- The Internal Control Manager: he/she can conduct an investigation in the event of a qualifying report under the Speak Up policy
- HR business partners: in the event of HR-related issues where an investigation mainly consists of hearing both sides of the argument

Furthermore, there are Internal – and External trusted persons; employees have the possibility to confidentially raise their concerns with one of the trusted persons.

2. Integrity, Respect and Fair treatment

Our staff are at the heart of our organization. We strive to achieve diversity amongst our staff, in a working environment in which people treat one another honestly and with respect. Diversity and inclusion contribute to the performance and success of our organization. We therefore do not tolerate any kind of discrimination, intimidation, bullying or (sexual) harassment.

See our Policy on Appropriate Behavior (**Appendix A**)

3. Fair competition

We are committed to honest and open competition. We operate according to the rules of decent entrepreneurship and act in accordance with the applicable laws and regulations in the area of competition (including competition and procurement legislation). For example, we do not engage in price fixing with competitors and we do not engage in market sharing. Our staff are obliged to report any suspicions they may have of any violation of competition or procurement law.

See our Policy on Fair Competition (**Appendix B**)

4. Communications

Appropriate communications are of crucial importance to our reputation. When our staff communicate with others about our organization, by whatever means, we expect them to do so in a professional and honest way, without harming either our organization or others.

See our Social Media Guidelines (**Appendix C**)

5. Company resources

Our company resources, including intellectual property assets and business-related knowhow, are highly valuable. We expect our staff to protect our company resources and use these in a responsible manner for the business purpose for which they are designed, unless permission to use them for another purpose has been explicitly granted.

See our Policy on Use of Company Resources and our Policy on Information Security (**Appendix D**)

6. Confidentiality

Company information, including personal data, is extremely valuable. We do not share the information to which we have access in the course of our work. We protect that information with the greatest care and store (or destroy) it in accordance with our contractual and legal obligations. We expect those staff who are seconded to our clients to observe confidentiality with regard to the company information of the client concerned and not to share this – including with our organization – without the client's permission.

See our Policy on Handling Information (**Appendix E**)

7. Ancillary functions

The performance of ancillary activities can easily create the impression of a conflict of interest. Moreover, ancillary activities can come into conflict with the interests of our organization. This is true for both paid and unpaid ancillary activities (for example unpaid directorships). Therefore, always abide by the rules for Ancillary functions (**Appendix F**).

8. Prevention of fraud

Behaviour that is intended to threaten or mislead others is not tolerated. Our staff are obliged to prevent fraud within our organization and to report any instances or suspicions of fraud.

See our Policy on Fraud (**Appendix G**).

9. Artificial Intelligence (AI)

We commit to Principles for responsible use of AI: I. Fair & Human-centric, II. Robust and Secure and III. Transparent & Explainable and follow Best practices for the use of AI tools.

See our AI guidelines (**Appendix H**).

10. Privacy & Personal data

We respect the privacy of our employees, customers, suppliers and other data subjects. This means that we treat personal data with care and manage it with professionalism and integrity. Personal data may only be processed for legitimate and justified purposes. Such data must be accurate and relevant to the purpose for which it was collected and properly protected against improper access or misuse. If personal data is to be transferred to third parties, it should be properly secured. If this is not complied with, there is a risk of harm to affected individuals.

See our Privacy guidelines (**Appendix I**).

11. Insider trading rules

The Insider Trading Rules relate to securities transactions and the prevention of insider trading compliant with the EU market abuse regulation.

See our Insider trading rules (**Appendix J**).

12. Speak Up policy (for local Benelux organization)

We encourage everyone who carries out work for our 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.

See our Speak Up policy (**Appendix K**).

APPENDIX

- A. Policy on Appropriate Behavior
- B. Policy on Fair Competition
- C. Social Media guidelines
- D. (a) Policy on Use of Company Resources and (b) Policy on Information Security
- E. Policy on Handling Information
- F. Rules for Ancillary functions
- G. Policy on Fraud
- H. AI guidelines
- I. Privacy guidelines
- J. Insider trading rules
- K. Speak Up policy (for local Benelux organization)

