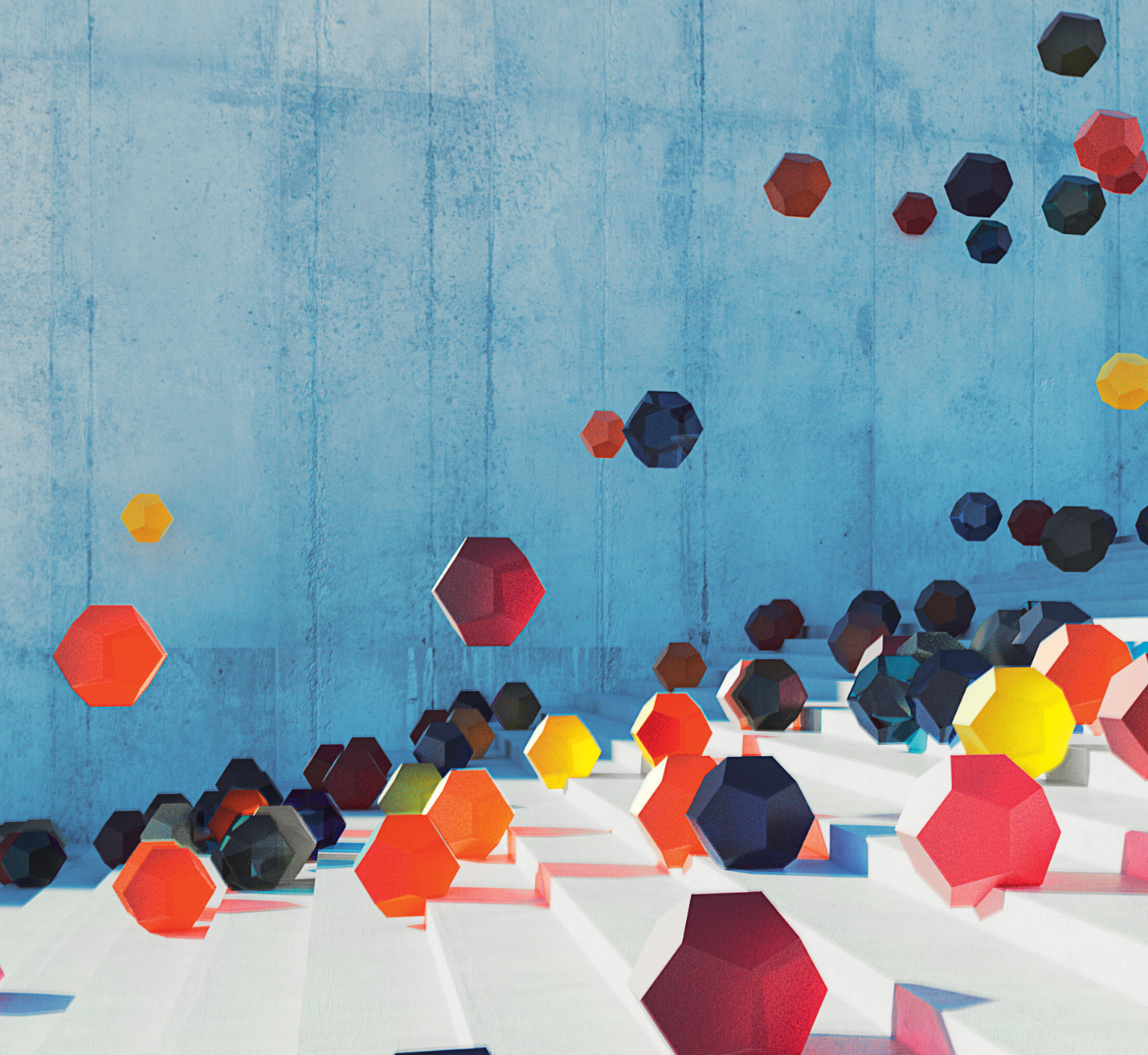


Code of ethics



The world is how we shape it

sopra  steria

Summary

Message from the Chairman.....	2
Our commitment as a responsible company.....	3
Our concern for the durability and responsibility of sustainable development constitutes a natural extension of Sopra Steria values.	3
The Group has signed the United Nations Global Compact, Advanced level.	4
Conducting business	5
Fundamental and social rights	6
Respect for the environment	7
Monitoring and application of the code of ethics.....	8
Whistleblowing system.....	9
Description of the Prevention of corruption and influence-peddling policy..	10
Definition	10
Practices implemented at Sopra Steria	12
Recommendations inside Sopra Steria	13
Control and alert procedures implemented at Sopra Steria	14

Message from the Chairman

Working in the professional sector, ethical conduct in our day-to-day business activities is the core requirement.

Over and above fashion and dominant trends, our role is to guide our customers in their choices and partner them in their major transformation projects, supported by the ethical principles and defining values of our company:

- Customer service is paramount;
- Quality and professional excellence;
- Respect for others;
- Drive for positive and effective action;
- Spirit of the Group.

The Sopra Steria Code of Ethics underpins our approach to transparency, fairness and loyalty towards all our stakeholders: customers, employees, shareholders, partners, suppliers and others in the wider society.

Supported by Group management, who ensure its rules are respected, the Code of Ethics applies to all employees to guarantee good conduct in our business activities.

It is in a spirit of excellence that Sopra Steria was created and developed. It is with this objective in mind that the Group will continue to build relations with all its stakeholders.



Pierre Pasquier
Chairman

Our commitment as a responsible company

Our concern for the durability and responsibility of sustainable development constitutes a natural extension of Sopra Steria values.

The Group prioritises strong management and respect for values in conducting its economic, environmental and social activities. The aim of this approach is to reconcile economic performance, social equity and respect for the environment.

To support respect and good management of its business, Sopra Steria has set out in this code the main ethical principles that are to guide our day to day actions.

This code is based on compliance with the laws and regulations in force in the countries where the Group operates and with commitments to conduct its business to the best of its ability.

In particular, the aim of the Sopra Steria Code of Ethics is to define the principal ethics that contribute to the Group's economic development, as such:

- transparency and fairness with its customers, partners and suppliers, in its relations and working methods;
- Respect for people it employs in terms of working conditions that are considered to be fair and non-discriminatory;
- Respect for the environment, in line with the current national and international standards.

The Group has signed the United Nations Global Compact, Advanced level.

WE SUPPORT



By this commitment, Sopra Steria upholds the 10 principles of the Global Compact concerning human rights, labour rights, protection of the environment and the fight against corruption. These principles are consistent with the Group values and fundamentals since its creation.

The Sopra Steria ethical codes in conducting its business are aligned to its commitment to the Global Compact.

Conducting business



Sopra Steria does not tolerate any form of corruption, influence-peddling or embezzlement with a view to obtaining a commercial advantage.

In conducting its business, Sopra Steria will comply with the following and ensure its employees also comply:

- legislation related to preventing and fighting any form of corruption and influence- peddling; direct or indirect, active or passive;
- rules related to competitive conduct;
- the confidentiality of information to which each employee has access in the context of his or her engagements and activities within the Group.

Sopra Steria is equally committed to avoiding situations where conflicts of personal interest are contrary to the Group's interests.

Fundamental and social rights



Sopra Steria complies with the principles and fundamental rights of the Universal Declaration of Human Rights of United Nations and the Charter of Fundamental Rights of the European Union.

Sopra Steria will:

- fight against child labour and exploitation, forced labour or any form of compulsory labour;
- comply with national social law and the specified labour agreements of each country where the Group does business;
- comply with the application of trade union rights in each of the countries concerned.

Sopra Steria implements a social policy aimed at preserving the health, safety and dignity at work of each of its employees.

In particular, Sopra Steria takes particular care to respect principles of equality, diversity and non-discrimination, both when hiring employees and throughout the career progression of its employees.

Respect for the environment



The service and consulting activities developed by Sopra Steria have a limited impact on the environment compared with heavy manufacturing activities. However, Sopra Steria has integrated improvement of its impact on the environment into the management of its activities.

Sopra Steria will therefore:

- comply with the laws and standards in force in the countries where the Group conducts its business;
- Implement actions for continuous improvement;
- monitor these actions over time.

To set out its commitment to the environment in the management of its activities, Sopra Steria has defined an environmental policy for its principal areas of operation. The principal areas with a direct impact on the environment; facilities, purchasing, business travel, infrastructure and IT resources.

Monitoring and application of the code of ethics

The Code of ethics and its commitments are carefully monitored at the highest level. It is steered under the responsibility of the General Management and involves all of the Groups functional and operational departments.

The managers of the Group activities are therefore responsible for compliance with the current applicable regulations and the internal procedures for their respective entities.

An internal communication programme, based on the Sopra Steria information mechanism, is, moreover, deployed for all employees and new hires in relation to these internal procedures.

Sopra Steria takes regular action to develop the awareness of all its employees and ensure they respect the Group's values and fundamentals and the principles of this code.

Awareness is notably developed at the seminars on integration, professional development and sharing of Group fundamentals organised by the Sopra Steria Academy internal training structure.

Whistleblowing system

In accordance with Sopra Steria's values and ethical principles, the Group provides all employees and counterparts with a whistleblowing system via the email address ethics@soprasteria.com.

The whistleblowing system enables to report situations that are potentially contrary to the Code of Ethics, especially linked to corruption, fraud, insider trading, competition law violations and breaches to fundamental human rights and freedoms, health and safety and the environment.

The security, integrity and confidentiality of the whistleblower's personal data and identity are ensured. To be considered a whistleblower, the individual must be personally aware of the situation and be acting both in good faith and in a selfless manner. The whistleblower is protected by the law.

Description of the Prevention of corruption and influence-peddling policy

Definition

Corruption may be defined as the act of giving, offering or receiving an illicit commission, an unjustified consideration or the promise of such a commission or consideration with the aim of influencing the behaviour of an individual in order to gain an unfair advantage (commercial, technological, economic ...), either directly or indirectly.

This definition distinguishes between the notions of:

- active corruption: from the point of view of the individual who grants the unjustified consideration;
- passive corruption: from the point of view of the individual who acts, or fails to act, in accordance with his/her duty for the purpose of receiving an unjustified consideration.

Influence-peddling is generally defined as the practice of offering someone an unfair advantage to abuse their influence, whether genuine or supposed, in order to obtain special treatment, jobs, contracts or any other favourable decisions from an authority or public service. The law makes a distinction between active and passive influence-peddling.

- active influence-peddling relates to the conduct of the person who suggests to a third party holding an influence, or accepts an offer from a third party holding an influence, to make use of that influence.
- passive influence-peddling relates to the conduct of the person who holds influence and offers or agrees to use it.

With regard to the different applicable national legislations once an act of corruption or influence-peddling is proven, the sanctions may take different forms in different countries, including fines, imprisonment, exclusion from the exercise of certain functions, dissolution of the legal entity concerned, fiscal penalties, exclusion from public contracts.

Furthermore, it should be noted that in most countries, especially those within the European Union, acts of corruption and influence-peddling related to the procurement of public contracts also generally constitute violations of the rules of competitive tendering which may lead to criminal penalties.

Practices implemented at Sopra Steria

Whilst not forbidding the principle of so-called entertainment and/or hospitality expenses, or of promotional or marketing expenditure aimed at promoting Sopra Steria's image, it should be noted that such costs and expenses must be strictly reasonable and moderate.

In all cases, it is strictly forbidden to either offer or receive:

- any form of bribe or under-the-table payment,
- cash payments,
- gifts to or from domestic and/or foreign public officials, especially in the context of a consultation process for the award of a public contract.

Recommendations inside Sopra Steria

Each Sopra Steria employee is required to exercise his/her professional activities with integrity and complete transparency, using discernment and good sense to ensure that all of his/her actions are based solely on the interests of the company, without prejudice to customers or other business partners.

The Code of Conduct for the prevention of corruption and influence peddling, complementary to the Code of Ethics, lists and describes the various types of behaviour to be adopted by all members of staff, both internally and with our stakeholders. It is illustrated by concrete examples and issued in ten languages, covering all Group entities.

If it happens that an employee is in a position to give or receive a gift (material object or an invitation), he/she must consider whether giving or accepting this gift would be prejudicial to the interests or the image of Sopra Steria.

In the event that the employee concerned is able to respond affirmatively to these questions, it is his/her duty to stop all actions and refer the matter to his/her superiors.

In the case of a negative reply, it should be understood that the only acceptable items are customary acts of courtesy or hospitality, communication actions and promotional events, or gifts of a symbolic or nominal value.

If the employee has any doubts concerning the gift, he/she should inform his/her superiors to obtain their approval, which will be strongly dependent on the actual context in which the gift is made.

Control and alert procedures implemented at Sopra Steria

The internal procedures put in place by Sopra Steria, in particular the procedures concerning purchasing and the procedures governing external invitations and entertainment expenses, are intended to prevent all forms of prohibited behaviour and are subject to regular review by the internal audit department.

Furthermore, in the event that a Sopra Steria employee becomes aware of a case of active or passive corruption or influence-peddling, he/she has a duty to inform his/her superiors and/or senior management.

Strongly dependent on the actual context in which the gift is made.