Sword Group CSR Policy

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Document Revision History

Version	Date	Author	Modifications	Approved by
1.0	2025-05-24	Piotr CZARNAWSKI	Adaptation to new strategic plan	Stéphanie DESMARIS

At Sword Group, we are committed to ensuring a safe, healthy, and fair working environment for all our employees worldwide. Our occupational risk management policy aims to prevent accidents and reduce health risks in the workplace, in compliance with local laws and applicable safety standards in each country where we operate.

1 | Scope

This policy applies to all employees, consultants, interns, and contractual partners working on Sword Group premises or participating in company-related activities, regardless of their location.

2 | Introduction

This CSR policy formalises Sword Group's commitment to sustainable, ethical, and inclusive economic development. It applies to all group entities, in every country where we operate, as well as to our employees and strategic stakeholders.

Sword Group is an international leader in digital transformation consulting, software engineering, cybersecurity, managed services, cloud, data & analytics, automation, and the management of complex projects. The group has more than 3,500 employees, is present in 17 countries, and delivers projects in over 50 countries.

We are particularly active in highly regulated sectors such as energy, European institutions, healthcare, luxury, governments, and international organisations, which increases our responsibility regarding social, environmental, and ethical issues.

Our CSR policy is built around three fundamental pillars:

- **Environmental commitment**, to reduce our ecological footprint and contribute to the transition towards a low-carbon economy,

- **Social responsibility**, to promote well-being, diversity, and human rights,

- **Conducting business ethically and responsibly**, by strengthening our governance and integrity in operations.

This policy is directly aligned with our **2025–2028 strategic plan**, which integrates CSR issues as drivers of overall performance, risk management, and attractiveness for talent and partners. It is based on the following international frameworks:

- The United Nations Global Compact, which we have adhered to since 2011

- The Sustainable Development Goals (SDGs) of the 2030 Agenda

www.unglobalcompact.org   **www.undp.org**

This policy will be reviewed annually to take into account regulatory and strategic developments as well as the expectations of our stakeholders.

3 | CSR Governance

Sword Group's CSR governance is based on a structured organisation, consistent with our decentralised operations, regulated business sectors, and multi-country presence. It ensures that ESG issues are integrated into our overall strategy while enabling locally adapted implementation.

Since 2022, the Group's CSR approach has prioritised operational involvement rather than the creation of top-down formal structures: each entity, from project teams to the Board of Directors, is involved in a process of continuous improvement.

3.1 Strategic Oversight

CSR strategy is overseen by the Board of Directors, which:

- approves the Group's ESG directions,
- monitors the implementation of CSR commitments,
- regularly reviews non-financial performance indicators.

In 2024, the Board of Directors addressed the following topics :

- social and environmental responsibility objectives,
- professional and pay equality,
- the ESG policy improvement plan,
- the management of social, environmental, and compliance risks.

A Governance, Ethics, Corporate Responsibility and Diversity Committee (merged with the nomination and remuneration committees) directly supervises the CSR policy. It met three times in 2024, with a 100% attendance rate.

3.2 Operational Approach to CSR

Beyond formal governance, CSR is implemented by all teams across the Group. This decentralised approach enables each level to propose and carry out concrete actions, including:

- **Social :** internal promotions, respect, diversity, dialogue.
    It is worth noting that this strategy has been applied for a long time and has proven successful, due to the very nature of a fully globalised and decentralised group involving employees from all backgrounds.
- **Business Conduct :** client satisfaction, security, responsible purchasing.
- **Societal** : digital protection of stakeholders, civic engagement, ethics.
- **Environmental :** carbon neutrality trajectory, including across the value chain.

This dynamic is driven daily by local teams, in a spirit of continuous improvement that is part of Sword's culture.

3.3 Documentation Framework and Internal Policies

The Group has formalised several key governance documents as part of its CSR approach:

- Code of Ethics
- Anti-Corruption Policy
- Data Protection Policy
- Whistleblowing Policy
- Diversity, Equity, and Inclusion Policy
- Human Rights Policy
- Responsible Purchasing Policy

These documents are regularly updated by the Board of Directors.

4 | Commitments

4.1. Sword as a Signatory to the United Nations Global Compact

In 2011, Sword Group joined the Global Compact (United Nations Global Compact), thereby committing to respect the 10 principles relating to human rights and labour, environment, and anti-corruption.

By joining the Global Compact, the company affirms its role as a responsible corporate citizen in the global economy. The Global Compact was chosen because it provides a globally recognised and enduring framework. Sword Group thus ensures compliance with the 10 principles set out by the United Nations Global Compact:

- Universal Declaration of Human Rights,
- International Labour Organization Declaration on Fundamental Principles and Rights at Work,
- Rio Declaration on Environment and Development,
- United Nations Convention against Corruption.

Human Rights

- Businesses are asked to support and respect the protection of internationally proclaimed human rights within their sphere of influence, and
- To make sure that they are not complicit in human rights abuses.

Labour Standards

- Businesses are asked to uphold the freedom of association and the effective recognition of the right to collective bargaining,
- The elimination of all forms of forced or compulsory labour,
- The effective abolition of child labour,
- The elimination of discrimination in respect of employment and occupation.

Environment

Businesses are asked :

- To support a precautionary approach to environmental challenges,
- To undertake initiatives to promote greater environmental responsibility, and

- To encourage the development and diffusion of environmentally friendly technologies.

Anti-corruption

- Businesses are asked to work against corruption in all its forms, including extortion and bribery.

Sword Group's Social Responsibility is to view the company not only as a place of production and a profit centre, but also as an entity with responsibility for its environment (the human dimension, both internally and externally, and respect for the environment).

The application of this general framework is implemented through actions tailored to the specific context of Sword Group, its business lines, employees, and subsidiaries.

4.2 ESG Strategy

Sword Group's CSR strategy has been developed around the main non-financial risks faced by the company.

Sword's strategic roadmap is built on three fundamental pillars. This roadmap sets out our commitments and ambitions, as well as the key performance indicators and targets we aim to achieve by 2030.

3 BONNE SANTÉ ET BIEN-ÊTRE	**Good Health and Well-Being** - Respect for others - Internal promotion - Recognition - Skills development - Occupational health and safety
4 ÉDUCATION DE QUALITÉ	**Quality Education** - Employee training plan - Partnerships with local schools
5 ÉGALITÉ ENTRE LES SEXES	**Gender Equality** - Promotion of gender equality - Combating discrimination and harassment

Reduced Inequalities

- The Group is committed to supporting women's causes at all levels and has invested in Europe and Africa through sponsorships and patronage initiatives aimed at women's sports and the integration of women, using the sporting environment as a means of inclusion.

Sustainable Cities and Communities

- Plan to reduce atmospheric emissions related to employee travel
- Sustainable waste management

Responsible Consumption and Production

- Reduction of paper consumption and digitalisation
- Reduction of travel through digital solutions
- Supplier assessment and sustainable supply chain
- Promotion of sustainable modes of transport
- Reduction and recovery of waste

Climate Action

- Reduction of the company's carbon footprint
- Support for reforestation programmes
- Green IT

4.3 Data Security

As a company specialising in Digital Transformation, compliance with the General Data Protection Regulation (GDPR) is essential. It is important for our clients to be able to rely on a trusted technology partner.

GDPR compliance also provides an opportunity to demonstrate a shared commitment to data protection and to prove our high level of IT security.

Since 2021, Sword Group has undertaken, in collaboration with MCI Group, a comprehensive initiative to harmonise personal data processing procedures worldwide..

By 2024, this system is fully operational:

- An international GDPR committee meets monthly,

- Data Protection Officers (DPOs) are appointed for each country or geographic area,

- Compliance audits and RoPA (Records of Processing Activities) registers are conducted regularly,
- Compliance is ensured in all areas where the Group operates, including outside the European Union (e.g., India, Lebanon).

5 | Objectives

5.1 Environment
- Tackle climate change by achieving carbon neutrality by 2030 and net zero emissions,
- Accelerate the transition to a low-carbon economy by helping our clients meet their environmental commitments,
- Switch to 100% renewable electricity and hybrid/electric vehicles by 2030.

  ➢ ACHIEVE CARBON NEUTRALITY BY 2030

5.2 Social
- Continually invest in our talents by supporting their skills development,
- Offer a diverse, inclusive, and hybrid working environment,
- Promote digital inclusion within our communities.

  ➢ 50 % WOMEN IN OUR WORKFORCE BY 2030

5.3 Governance
- Promote diverse and responsible governance,
- Consistently maintain high ethical standards for shared growth,
- Protect and secure data, infrastructure, and identities.

5.4 Responsible Purchasing
- Systematically integrate CSR criteria into tenders and framework agreements,
- Achieve 80% of strategic suppliers assessed on CSR criteria by 2030,
- Deploy a responsible supplier charter in all countries,
- Require all new suppliers and contractual partners to sign the Responsible Purchasing Charter,
- Favour relationships with suppliers committed to environmental, social, or circular economy initiatives,
- Conduct annual monitoring of supplier CSR performance, with improvement plans if necessary.

6 | Ongoing Monitoring
- Major recognitions and certifications
  - Our subsidiaries are certified ISO 27001, ISO 9001, and ISO 20000, and we will extend these certifications to all future acquisitions.

- Similarly, the Group participates in assessments conducted by extra-financial rating agencies such as :

7 | Communication

This policy is communicated to all employees. It will also be integrated into training sessions and made available to stakeholders upon request.

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