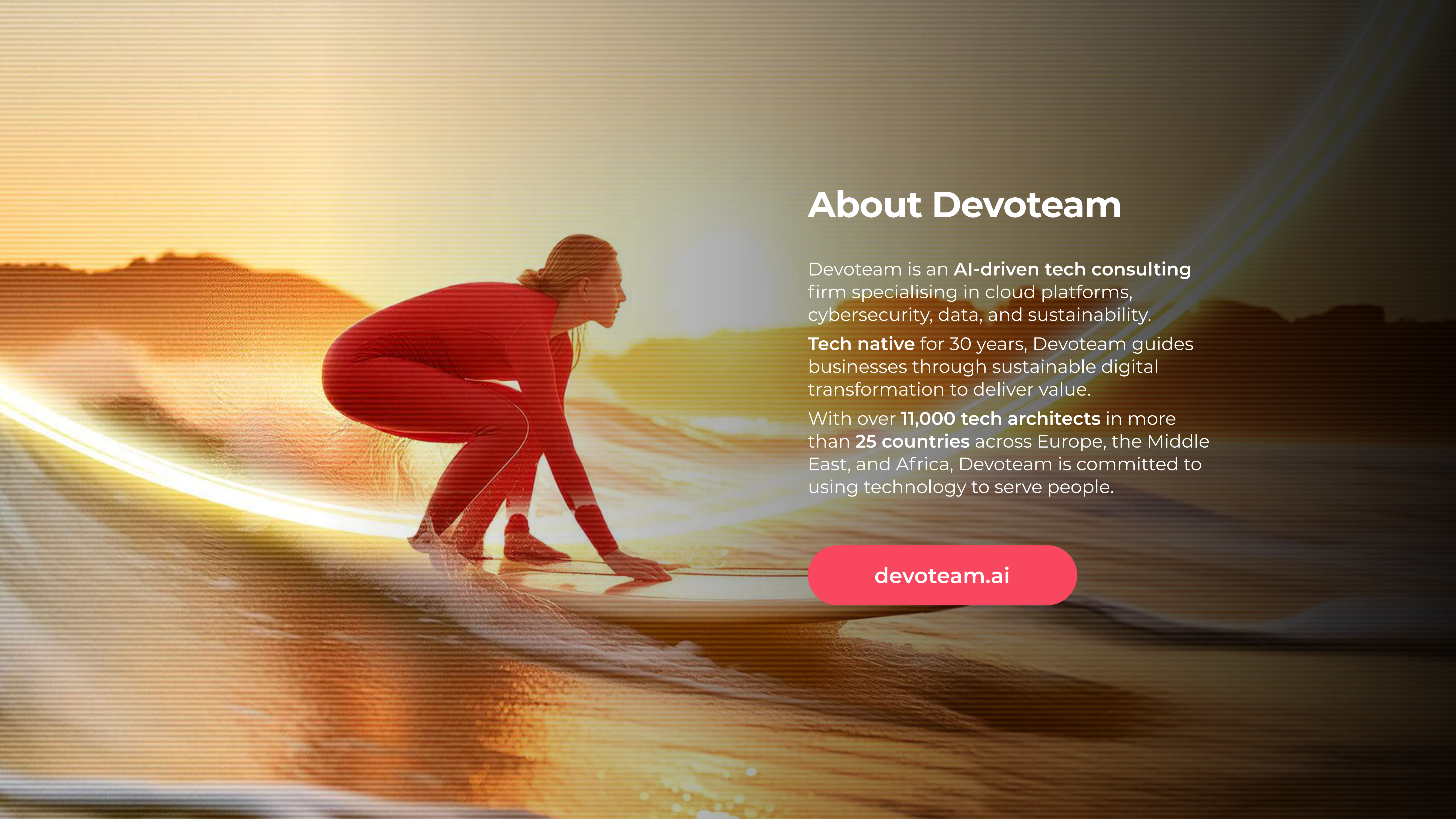




2024

Sustainability Report

AI-driven tech consulting

A woman in a red wetsuit is crouching on a surfboard, riding a wave. The scene is set at sunset or sunrise, with a warm, golden glow. The background shows a dark, silhouetted coastline under a bright, hazy sky. The overall mood is dynamic and energetic.

About Devoteam

Devoteam is an **AI-driven tech consulting** firm specialising in cloud platforms, cybersecurity, data, and sustainability.

Tech native for 30 years, Devoteam guides businesses through sustainable digital transformation to deliver value.

With over **11,000 tech architects** in more than **25 countries** across Europe, the Middle East, and Africa, Devoteam is committed to using technology to serve people.

devoteam.ai

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Devoteam group

Letter of commitment

GRI 2-22

Dear Devoteamers and Partners,

Sustainability is at the core of our Tech for People vision and mission as tech architects. For the last 30 years, we have supported our clients in building their tech transformation for sustainable value, with human beings as our main focus. We are convinced that promoting sustainable AI will bring new opportunities to help humanity reach the sustainable 2030 agenda of the United Nations.

We would like to warmly thank all Devoteamers across all geographies who remained engaged last year and contributed to leading our sustainability agenda in four dimensions: **Value, Environment, Ethics, and People (VEEP)**. The range of our entities ISO certified - 9001, 27001, 14001, 37001, 45001 - is extended every year, and our **Platinum Ecovadis Label** was confirmed, with an increasing score. We also achieved a **B grade on CDP** (Carbon Disclosure Project). Such certifications and labels recognise our efforts.

In 2025, with increasingly tense geopolitical and economic contexts, more than ever we need to keep focused on our main goals and targets to increase our impact on the long-term:

- 1. The Science-Based Target Initiative (SBTi) approved our carbon reduction targets** last summer, and they are fully part of our Amplify strategic plan KPIs. It's now time for quicker operationalisation in our geographies. Action plans will be developed to reduce our energy consumption, as well as our pressure on natural resources. With our carbon science-based target, we joined the **UN Forward Faster initiative** as proof of our commitment to make the biggest, fastest impact before 2030. And we will add new focuses to it. Particularly, we want to intensify our already strong action on the end of life of our tech devices.
- 2. Such ambition requires an even deeper relationship with our suppliers and partners.** After implementing in all geographies, in 2024, our sustainable purchase policy, including multiple dimensions like Environment, Human Rights, anti-corruption, security, and data protection, we will work together with them on the improvement plans.
- 3. This due diligence is a key component of major regulation evolutions at the European level to improve transparency and business sustainability impact.** Following these evolutions and aligning with the **Corporate Sustainability Reporting Directive (CSRD)** is an opportunity for Devoteam to continue adapting and improving our practices and disclosures. This is a governance matter, as well as clients' expectations.

- 4. As we offer AI-driven transformation to our clients, we know that they represent our greatest potential for building a sustainable future, provided we manage the potential side effects on the environment, people and ethics dimensions. 40% of Devoteamers are now certified in Sustainable IT, a topic also included in the GenAI training delivered to our entire workforce.** We will continue to train all our staff to ensure we can **drive, together with our clients, a digital just transition**, aligned with the United Nations Global Compact principles.

The momentum is high and must remain at this level despite the winds. We all have a major role to play, and we know you are already assuming your own. As a company, Devoteam's leadership is committed to supporting and acting toward our goals.



**Stanislas and Godefroy
de Bentzmann**
Devoteam co-CEOs

Devoteam at a glance

GRI 2-1, 2-2

Devoteam is a premium consultancy firm driving digital business and transformation through innovative technology.

Tech native for over 30 years, we deliver lasting results in Cloud, Data, Cyber and AI for industries and public institutions across EMEA.

At Devoteam, tech entrepreneurship is at the core of our values, fostering our spirit as a learning company. Within this culture, we attract and train top professionals, creating high talent density across our 11,000 specialists. Strong partnerships have always been central to our DNA, which is why we collaborate closely with both well-known tech giants and emerging innovative startups. This ecosystem enables us to provide long-lasting solutions that help clients lead in their industries.

OUR VISION

Tech for People

OUR MISSION

As tech architects,
we build your
AI-driven transformation
for sustainable value

Revenue

€1,158M

+2.5% vs 2023

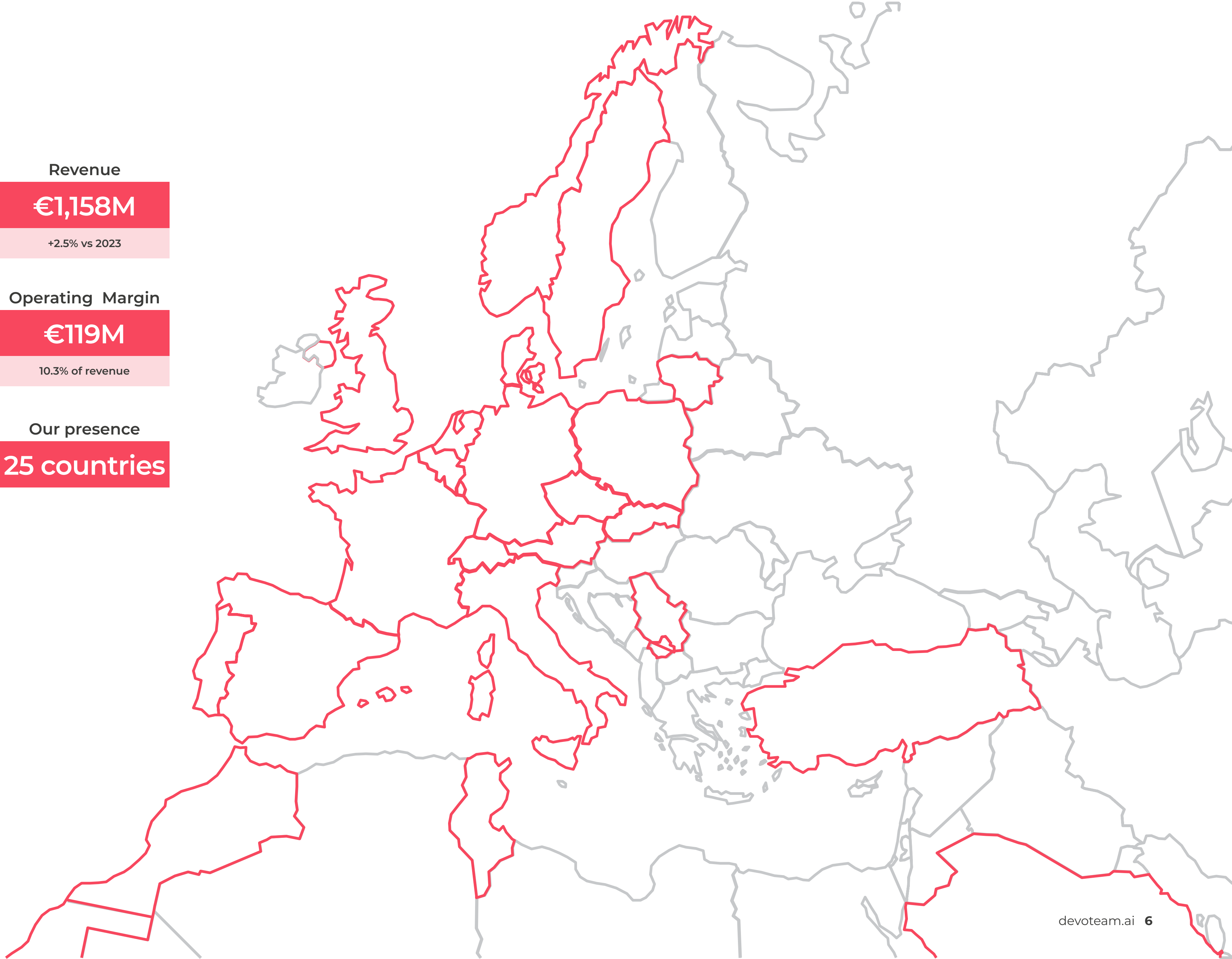
Operating Margin

€119M

10.3% of revenue

Our presence

25 countries



Our strategy

At Devoteam, tech is in our DNA, and it's the people we empower with tech. Now, with responsible AI, we're ready to unlock a future where technology drives positive change.

Amplify our 2024-28 strategic plan

2024 was a transition year between the Infinite 2024 Strategic Plan and Amplify one.

Infinite 2024 ended in doubling the revenue to more than €1B, and 10,0000+ employees with key focuses on strategic partners, employee upskilling and certifications, and the increase of multidisciplinary within Devoteam.

Amplify is built on this success and the contribution from the entire Devoteam ecosystem: consultants and management team from 25 countries, experts, communities, partners, recognized analysts and customers.

Main objectives of Amplify:

- Reach €2B revenue
- Reach 50% AI-driven group signing by 2028
- Certify 75% of our talents on our partners & expertise techs, and train 100% of them on GenAI
- Reduce our Scopes 1&2 GHG emissions by 33% from a 2022 base year.

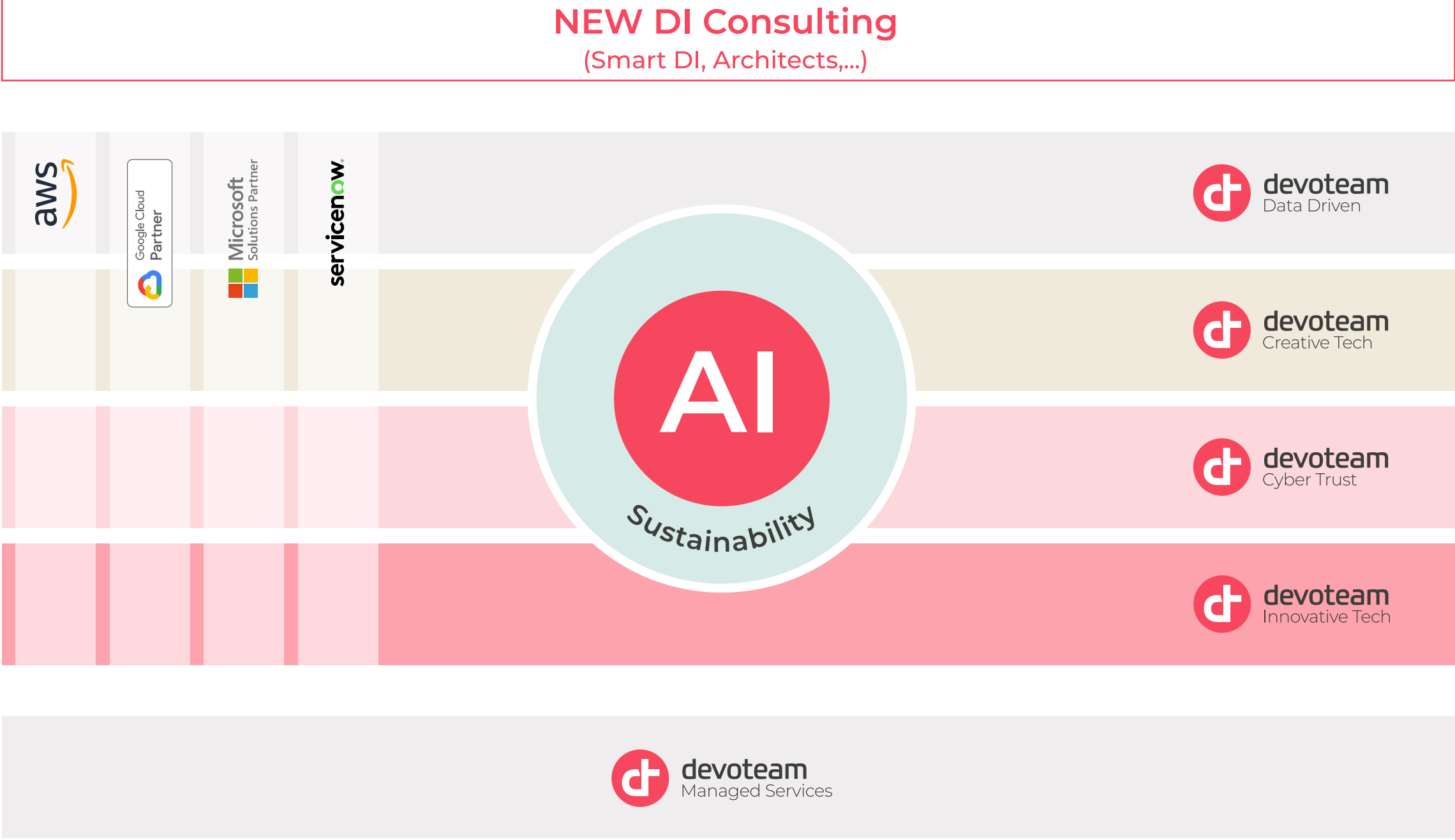
Our expertise: AI and sustainability at the core

Up until now, we've seen that moving **from old systems to the cloud was a step-by-step process**. But **with AI, Devoteam believes it's going to be different**. With AI, you can transform your whole organisation by working on 4 different blocks simultaneously; but not necessarily at the same pace.

1. **Align business & technology** goals as AI impacts everything
2. Continue to **strengthen** your cloud, data, cybersecurity and Apps **foundations**
3. **Connect & automate** all those foundational building blocks to achieve business goals
4. **Integrate ethics** in each step

To support our clients in this ambition, Devoteam has adapted the governance of our expertise:

- **Strategy and design:** Digital Impulse support case-driven AI transformation
- **To build & Transform:**
 - **4 Partner Pillars**, one per strategic partner alongside an ecosystem of emerging tech players:
 - **A Cloud** dedicated to AWS,
 - **G Cloud** Dedicated to Google Cloud,
 - **M Cloud** dedicated to Microsoft,
 - **N Platform** dedicated to ServiceNow,
 - **Our transversal expertise across the Group**
 - Data Driven helps companies turn data insights into business impact.
 - Creative Tech is fusing competencies to create great digital products and experiences.
 - Cyber Trust makes our client's journey more secure.
 - Innovative Tech helps organisations unleash their cloud potential with innovative technologies



- **2 central agencies to embed sustainability and AI** in all our deliveries.
- **To Manage & Run:** One delivery network with Managed Services and in nearshore to improve customer impact

Our unique approach, combining a strong ecosystem of partners and deep tech expertise, allowed the company to earn major recognitions awarded by these platforms. For example:

- Devoteam has been recognised as a **ServiceNow 2025 Partner of the Year for the third consecutive year**, winning top awards in multiple categories (Consulting and Implementation Partner of the Year, Elite – EMEA and Customer Workflow Partner of the Year – EMEA)

- Devoteam has won five 2025 **Google Cloud Partner of the Year awards for the sixth consecutive year**, recognising our expertise in Artificial Intelligence, Infrastructure Modernisation, Talent Development, and country-specific achievements.
- Devoteam is an awarded **'Microsoft Azure Expert MSP' and recognised with the 'AI Platform on Microsoft Azure Specialization'**
- Devoteam has a multi-year Collaboration Agreement with AWS to cement Devoteam's role as a leading Generative AI partner for AWS. Devoteam is selected as an **AWS Service Provider in OCRE 2024 Framework**. It underscores a strong capability in delivering cloud services to the research and education sectors.

Client Case

Bouygues Telecom Partners with AWS and Devoteam to Create AI-Powered TV Service

Innolab Tech, a Bouygues Telecom entity, focuses on creating innovative products and services, utilizing generative AI for new use cases. They developed “Ensemble ce soir”, an AI-based TV service that provides content recommendations for families in under 5 minutes, in partnership with AWS and Devoteam.

Devoteam’s AI Expertise Accelerates Bouygues Telecom’s Innovation

Bouygues Telecom’s Innolab Tech partnered with Devoteam to bring their vision of a generative AI-powered TV service to life. “Initially, our thinking was to find out how to exploit generative AI in TV with a service intended for the general public,” said Thomas Foucher, AI Engineer at Bouygues Telecom. Devoteam’s AI expertise was instrumental in navigating the complexities of integrating AI with the recommendation system, ensuring the service could effectively understand user preferences and deliver tailored content suggestions.

Key Points:

- Devoteam’s AI Expertise: Bouygues Telecom relied on Devoteam’s deep understanding of AI and cloud technologies to accelerate development and ensure a robust, scalable architecture. The resulting service, “Ensemble ce soir,” addresses the common challenge of finding content that the whole family can enjoy. “The idea is to provide a tool that reduces the time spent finding content that suits everyone and achieves a result rather than ending up in a family argument!”
- Collaborative Development: Devoteam experts were fully integrated into the project, working alongside the internal team to deliver the service in under three months.

Benefits

Successful Partnership: The collaboration between Bouygues Telecom and Devoteam resulted in a successful product preparation and continues with further AI initiatives, showcasing the value of combining cloud and AI expertise for innovation. Overall, Devoteam’s support played a crucial role in enabling Bouygues Telecom to rapidly innovate and bring new AI-powered services to market.



How to Enhance Employee Experience through AI: The Scout AI Chatbot Story

About our client

Our client, a prominent hospitality company in the Nordic region, operates over 234 hotels and employs more than 20,000 people. Our client is renowned for its focus on quality and innovation and is dedicated to exceptional guest experiences. The company upholds its core values of energy, courage, and enthusiasm while embracing modern technology to enhance its services. By fostering a vibrant culture, our client sets new standards in the hospitality industry, ensuring memorable stays for guests across the region.

The Challenge

Our client faced challenges when upgrading its legacy systems to more flexible and lightweight solutions. The shift introduced new information and procedures, making it difficult for employees to find and understand what they needed. Traditional knowledge-sharing methods and internal communication struggled to keep up with these changes. To address this, our client aimed to create a centralised platform where employees could easily access information about the company's culture, processes, and FAQs. This platform would streamline operations and improve the overall employee experience.

The Solution: The Scout AI Chatbot

Devoteam addressed this challenge by customising and expanding Our client's AI chatbot, "Scout," using Google's Gemini technology. Scout analyses internal data from documents, websites, and knowledge bases, integrating with tools like Google Chat and Slack.

Key components of the solution include:

- **Google Cloud's Gemini:** Enables Scout to understand and respond in English, Swedish, and Norwegian, learning from our client information sources.
- **LangChain:** Provides context-aware conversations by considering past interactions and our client specific environment.
- **Function Calling:** Allows Scout to access real-time data from our client internal systems, enhancing functionality.

The Result: Enhanced Efficiency and Employee Experience

Scout has transformed our client knowledge-sharing, creating a centralised platform for information retrieval. This AI chatbot, built with Google Cloud, is now a trusted resource for employees, significantly boosting efficiency and enhancing the overall employee experience. High user adoption and consistent accuracy have reduced the load on support channels and saved time without our client needing to change its existing tools. The success highlights the impact of innovative solutions on operational improvements, creating a more data-driven organisation.

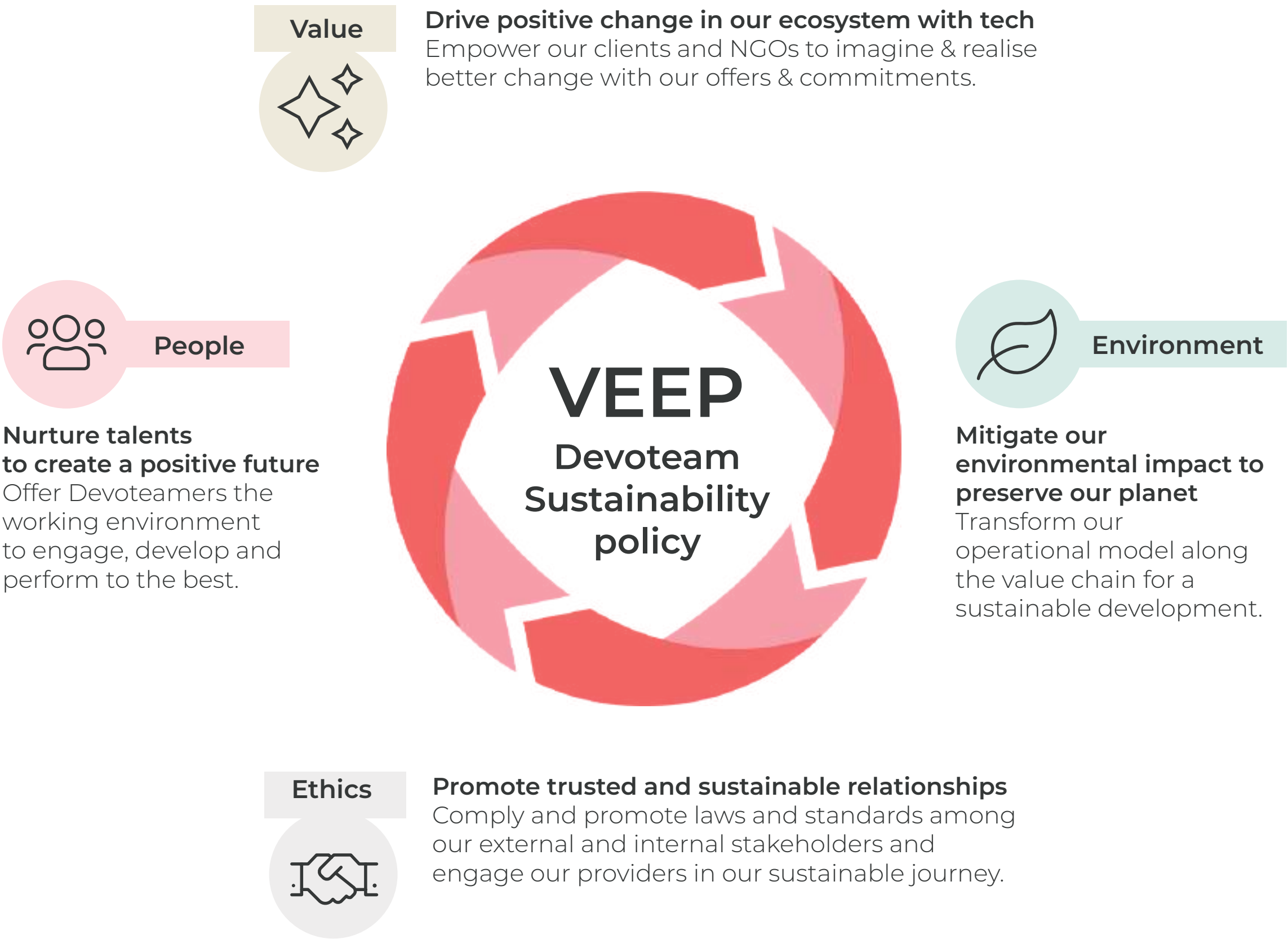


Our Sustainability policy and achievements

GRI 2-23, 2-24

To lead our sustainable agenda, and answer to the risk map, Devoteam created **VEEP**, Devoteam's ESG (Environment, Social & Governance) strategy, based on four dimensions: **Value | Environment | Ethics | People**.

A **CSR webpage** gathering all the information about our VEEP dynamic is also available on our website.



Related policies

Several policies are related to our sustainability policy and will be mentioned in this report, including the following, applicable to all Devoteamers across all geographies:

Our Environmental policy, aligned with ISO 14001 & 50001 certifications, detailing our commitments and actions in favour of nature, with a particular focus on climate change and biodiversity. It is completed with a business travel policy aiming to reduce CO2e emissions from travels.

Our Human rights policy, aligned with ISO 47001 certifications, the **10 principles of the United Nations Global Compact**, the **United Nations Universal Declaration of Human Rights**, the **International Labour Organisation conventions**, the **OECD Guidelines for multinational Enterprises**, and the General Data Protection Regulation (**GDPR**). It covers respectful employment practices, diversity and inclusion, health & safety, anti-slavery statement, our business practices and Whistleblowing alert system.

Our Business Conduct policies, align with ISO 37001 & 27K certifications, described in **ESRS G1** ensuring we drive respectful business relationship with all our stakeholders, including:

- Our Code of conduct
- Our Anticorruption charter
- Our Economic sanction policy
- Our purchase policy - including a Supplier Code of Conduct
- Our IT policy

Our Quality policies, aligned with ISO 9001 certifications, confirm our commitment to our Clients to deliver the best quality of services for continuous improvement.

The policies and their effect are developed in the related ESRS.

Sustainability Commitments and Recognitions

GRI 2-28



Group coverage

UN Global Compact
As a signatory of the **Global Compact** since 2007, Devoteam Group is committed to respecting the 10 principles set out by the UN in 1999. Fully adapted to the company's context, these guiding principles outline Devoteam Group's CSR policy.



Ecovadis Sustainability Rating: 88/100 - Top 1% companies
As proof of its commitment to CSR Devoteam Group has been awarded the **Ecovadis** platinum label, a platform for evaluating the CSR performance of companies worldwide, with a significant increase of more than 10 points on the overall average.



Cybervadis: 906/1000 - Mature
Devoteam S.A.S was evaluated on the **Cybervadis** questionnaire, based on the ISO 27001 standard, and received the grade of 906/1000 which is equivalent to the highest level of maturity.



CDP, Carbon Disclosure Project: Score of B
In 2024, Devoteam Group obtained a score of B according to the criteria defined by the **Carbon Disclosure Project**, a score recognizing great level of management of our environmental impact.



SBTi targets approved
In 2024 our near-term science based emissions reduction targets and our net-zero targets were approved by the **Science-Based Target initiative**.

Entity coverage

Increasing the number of entities ISO certified

- **ISO 9001 - Quality Management System:**
France, Germany, Italy, Lithuania, Poland, Portugal, Spain, United Kingdom
- **ISO 14001 - Environmental Management System:**
France, Germany, Lithuania, Poland, Spain, United Kingdom
- **ISO 27001 - Information Security Management System:**
Austria, Germany, Italy, Lithuania, Poland, Portugal, Spain, United Kingdom
 - ISO 27701: Portugal
 - ISO 27018: Italy
- **ISO 37001 - anti-bribery management system:**
Germany, Italy
- **ISO 42001 - Artificial Intelligence Management System:**
United Kingdom
- **ISO 45 001 - Health & Safety Management System:**
Germany
- **ISO 50 001: Energy Management System**
Germany, Lithuania (through building owner)

Other Local commitment and recognitions

- **Belgium:**
 - United Nations HeForShe
- **Denmark:** Great Place to Work
- **France:**
 - Planet Tech'Care
 - INR (Institut du Numérique Responsable)
 - Manifeste #ReconversionFemmesNum
 - Qualiopi
 - VeriSelect
 - La Charte Relations fournisseurs et achats responsables (France and BeTeam entity)
 - Charte de la Diversité signed since 2007
 - Universum 2024 Most Attractive Employers
 - Certification Gold "Tiers Responsable" by Provigis
 - Happy Trainees 2024
 - Ecovadis Gold 2024 for BeTeam Entity
- **Lithuania:** ISAE 3402 Type II +
- **Luxembourg:**
 - Sustainability Awards 2024 by IMS organisation
 - Best Workplace Label from Great Place to Work
- **Spain:**
 - CMMI-DEV3
 - ENS
- **Norway:** Miljøfyrtårn
- **Portugal:**
 - Crest
 - GNS
 - PCI
 - Bancontact

The scope of each certifications and pieces of evidence are available on demand.

Sustainable Development Goals

GRI 2-23

Devoteam has been a signatory member of the United Nations Global Compact (UNGC) since 2007. We are committed to the **United Nations Guiding Principles**, and Sustainable Development Goals.

Goals we directly affect



Goals we indirectly affect

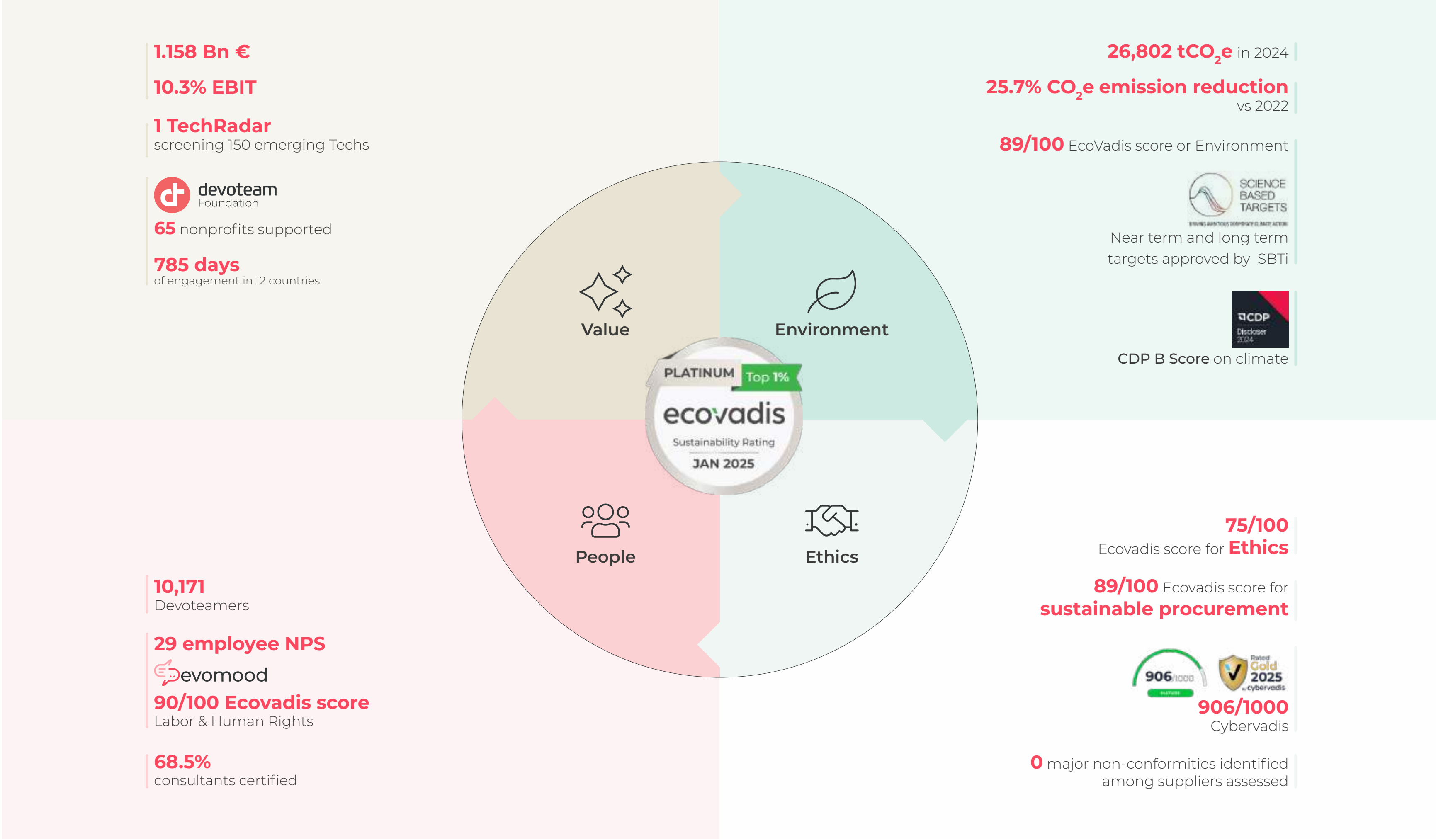


Contribution to
our most relevant
UN SDGs

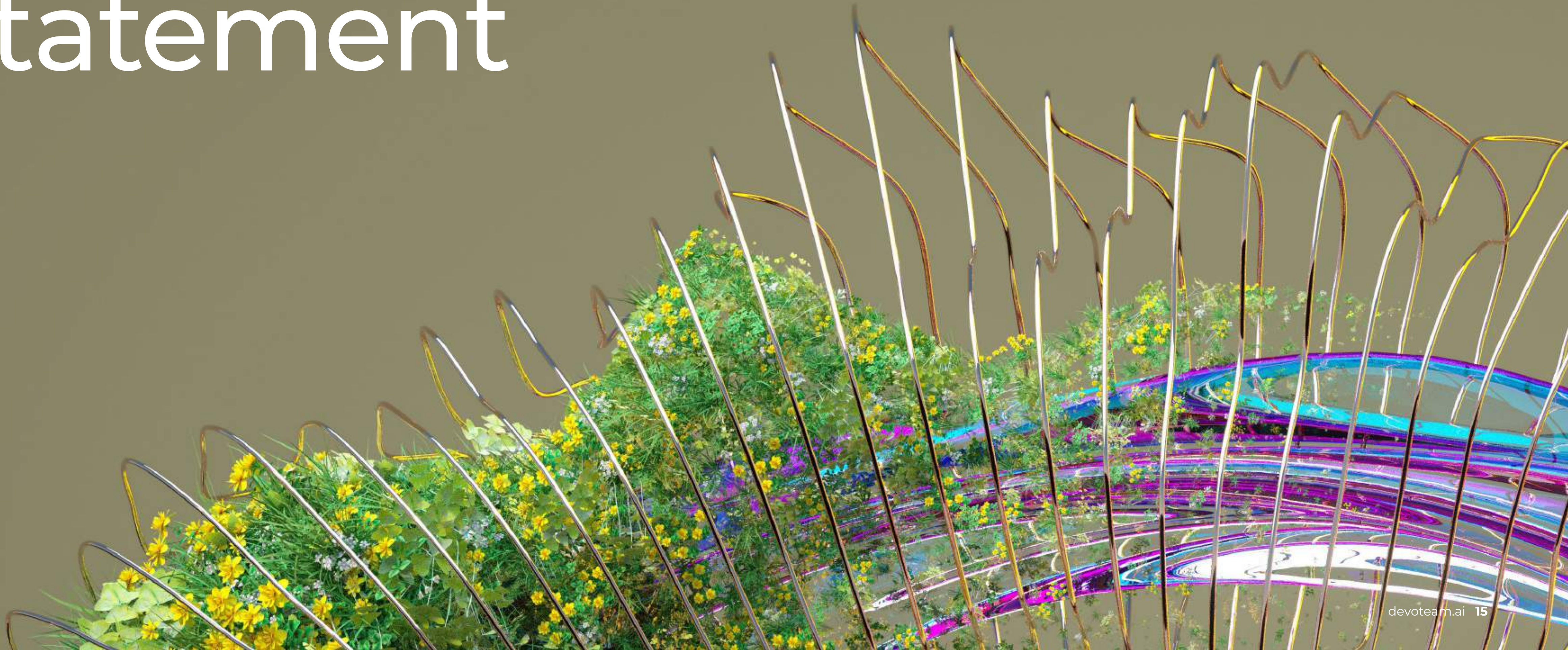
GRI 2-23

									
Programmes and commitments									
Our human rights policy and commitment to offering our own people and suppliers a minimum living wage, in accordance with the local laws, regulations and standard of living. Devoteam Foundation Programmes.	Our global and local Health and Safety policies, stressing our commitment to follow and improve health and safety through local programmes and insurances Devoteam Foundation Programmes.	Our learning programmes offering valuable learning opportunities to Devoteamers and fostering promotion and opening up possibilities to work on even more impactful missions. Devoteam Foundation Programmes.	Our human rights policy and commitment to offer valuable career opportunities to our employees, regardless of their gender, social, cultural or any specific background. Devoteam Foundation Programmes.	Our mission to empower our clients to lead a dual digital and sustainable transformation, putting IT at the service of a sustainable growth. Our Code of conduct to ensure the benefit of all stakeholders	Our innovation & tech transformation programmes.	Our sustainable purchasing strategy Our waste management strategy, especially on e-waste.	Our environmental policy and our Carbon reduction targets and actions plans	Our code of conduct promoting ethical behaviours along our value chain, including diversity and inclusion, anti-corruption, and environment conservation. Our Whistblowing/ethics alert system.	Our global partnership for sustainable development: partners, clients, and Non-profit organizations.
References in the report									
ESRS S1 Adequate wages Impact of IT Devoteam Foundation	ESRS S1 Work life balance and health and safety Impact of IT Devoteam Foundation	ESRS S1 Training and skills development Impact of IT Devoteam Foundation	ESRS S1 Social Diversity, Equality and Inclusion Impact of IT Devoteam Foundation	Devoteam at a glance Our strategy ESRS 2 Strategy, Business model and Value Chain Impact of IT Our sustainability offers Innovation programmes/ ESRS G1 Business conduct	Impact of IT Our sustainability offers Devoteam Foundation	ESRS G2 ESRS E5 Resource use and circular economy	ESRS E1 Climate change	ESRS S4 Data protection of Consumers & end-users ESRS G1 Business conduct Cybersecurity policies and actions	Devoteam at a glance Our strategy Impact of IT Our sustainability offers Devoteam Foundation

2024 Key achievements



Our sustainability Statement



1. General Disclosures

[ESRS 2]

The EU's Corporate Sustainability Reporting Directive (CSRD), effective for the 2024 financial year, requires companies to standardize and improve their sustainability reporting. We've been working to enhance our reporting practices, resulting in more structured and comprehensive disclosures. This report outlines the key sustainability issues we've identified and provides our stakeholders with transparent, comparable, and reliable information about our environmental, social, and governance (ESG) performance.

Devoteam is part of CSRD second wave, so this report, while built with the CSRD requirement structure, is not fully aligned yet with the regulation. The approach is based on the CSRD, the GRI protocol and the criteria established using the UN Global Compact as guiding tools.

Preparing for the CSRD has been a key driver in optimizing our business processes and deepening our understanding of what's crucial for Devoteam's short, medium, and long-term success. Collaboration across our international offices and various departments, including Finance, HR, IT, Legal, Marketing, and Operations, has been essential for improving our processes and gathering the necessary data for sustainability reporting.

A core component is the Double Materiality Assessment (DMA), which identifies the sustainability issues material to our business and value chain.

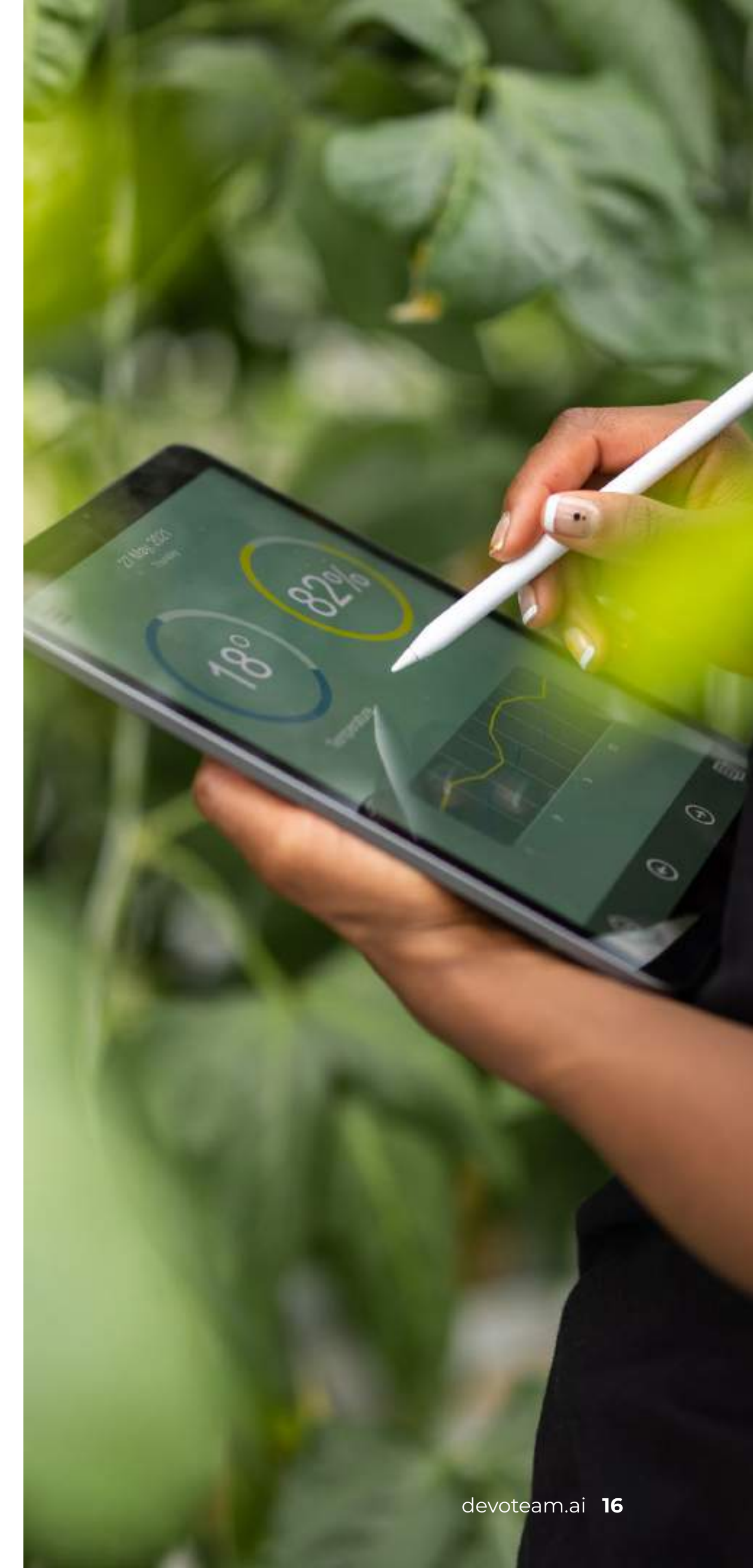
In 2024 we realised our first double materiality assessment, which is the basis for structuring the following report. Based on this first step, we will report on the following standards:

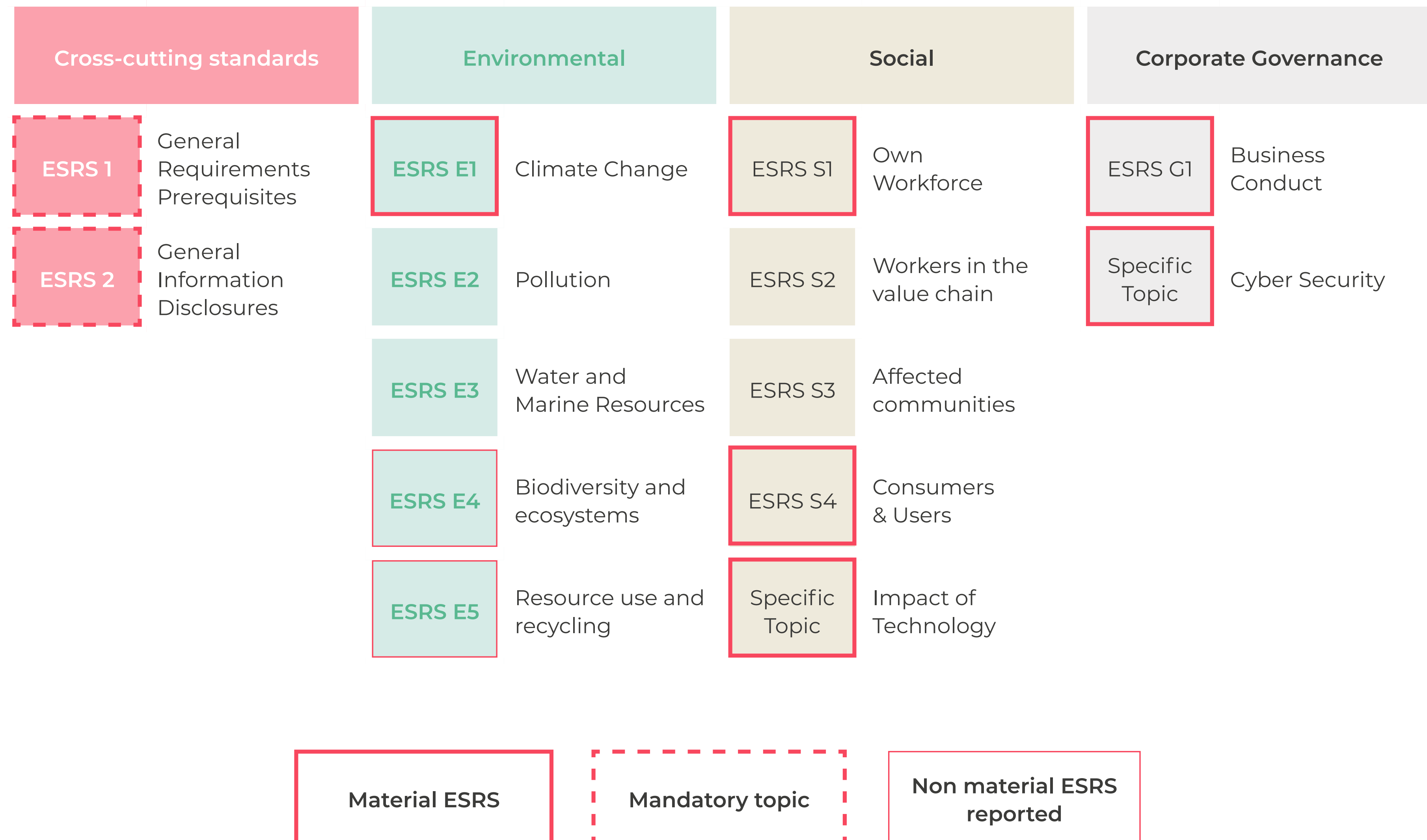
- General Disclosures
- Climate Change
- Own Workforce
- Consumers & End services (especially regarding Data Privacy topic)
- Business Conduct.

Our double materiality also led us to include two company specific topics:

- Cybersecurity
- Impact of Technology.

In 2025, we aim to implement a more structured CSRD reporting approach by standardizing data collection and establishing data analysis and control processes.





Basis for preparation
[BP-1] [BP-2]
GRI 2-2, 2-3, 2-4, 2-5

The sustainability reporting for Devoteam is prepared pursuant to Article 48i of Directive 2013/34/EU.

Perimeter

The sustainability statement for Devoteam covers Devoteam SAS, and all subsidiaries on which Devoteam has an operational control. In the report, “Devoteam Group” or “Devoteam”, or no mention refers to corporate policies, strategies and actions, applied in every geography to all Devoteamers.

“Devoteam + country” (for instance, Devoteam France) refers to activities whose scope is specific to said country. Headquarter employees are generally included in the country they work in, exceptions being mentioned.

When appropriate, we precise if actions are particularly dedicated to consultants, meaning the Devoteam employees working directly for our clients. When no mention, it means all employees (consultants and structure) are concerned.

Our value chain is also included when IROs were identified in our upstream, downstream, and own operations.

Devoteam Group wants to demonstrate its commitment by following the rules of the Global Reporting Initiative (GRI), the United Nations Global Compact, and the Sustainable Development Goals (SDGs). The references to these commitments are indicated in each chapter and explained in the appendix of this report.

Time horizons:

The time horizons considered in this reporting are aligned with those applied in the financial statements. Short-term is related to one year (reporting period); medium-term is up to five years; long-term is defined as more than five years.

Data collection principles:

- International development of common tools to align all countries on processes and associated reporting: Salesforce for CRM coordinated by Sales Department, Workday for HR management and Smartrecruiter for the recruitment coordinated by Talent & Learning Department, Local ERPs, OneBI (data visualisation based on Tableau) coordinated by Finance Department. The Chief Financial Officer and Chief Information Officer sponsor and coordinate these initiatives.
- International and annual ESG data collection coordinated by Group CSR department, involving all local and corporate departments, especially CSR, Finance, IT, Facilities and HR and all geographies of the group.

Estimations & outcome uncertainty

Potential estimates and uncertainty are mentioned and described in the dedicated sections and, for Carbon footprint, in our Inventory Management process, available on demand.

Estimations mainly concern the calculation of our Carbon footprint, for example:

- Calculations based on squared meters of our buildings when the owner can’t provide us with the consumption in kwh,
- Calculations based on the number of people in one office in some geographies where the weight of waste is not measured by the building owner,

- Estimations of our value chain (financial ratios, estimation of the number of FTEs represented by our subcontractors....).

Another source of uncertainty lies in the manual collection of certain data or tools, involving a risk of human error:

- On social matters, most data consolidation lies on manual data population of Workday, our tool, by the HR teams of the different countries (birthday, compensation...).
- On carbon matters, although we use a platform to calculate our footprint, it is not linked with our financial tools yet and the data collection is still manual.

The verification of the data used for our carbon footprint and social report, with consistency checks compared to previous years and to other countries, aims to reduce the uncertainty.

From year to year, Devoteam leads actions to reduce estimations:

- Regular increased automation of reportings and data population
- Discussions with the building owners of our offices to get more accurate data
- Sustainability questionnaire sent to our top providers, representing 80% of our expenses) to integrate their calculated footprint instead of using monetary ratios.

Changes, errors and restatements:

In the event of errors in 2023 sustainability reporting, or in case of any changes, they are described in the relevant section.

Devoteam will provide a restatement of information if previously reported information needs to be revised.

External assurance:

The data collected is audited by external auditors before publication (limited assurance).

1.1 Corporate Governance
GRI 2-9, 2-10, 2-11, 2-12, 2-13, 2-14, 2-16, 2-17

1.1.1 Administrative, management and supervisory bodies [GOV-1] [GOV 2]

The integration of Sustainability in all the operations is managed with two main structures:

1. The Group governance with Global and international committees:

- **The Board of Directors** consists of (i) five voting members (20% of women) including two representatives of our Investor KKR, the two Co-CEOs of Devoteam and one non-executive independent (ii) and three Observers including two non-executive independent members and one representative of our Investor KKR. There is no representation of employees in the Board of Directors.

The Board of Directors is responsible for the overall and strategic management and proper organisation of Devoteam, ensuring long-term value creation. They meet monthly and receive quarterly reporting on sustainability matters, including information about material impacts, risks and opportunities, targets and metrics and make major decisions about ambitions.

- **The Managing Board** consists of the two Co-Founders and Co-CEOs of the Group, and the Group Managing Director (100% men). They meet weekly to manage the strategy of the

Name	Category	Company	Gender	Role
Stanislas de Bentzmann	Management	Devoteam	Male	Voting member
Godefroy de Bentzmann	Management	Devoteam	Male	Voting member
Adam Warby	KKR Sr Advisor	KKR	Male	Observer
Jerome Nomme	KKR employee	KKR	Male	Voting member
Jean-Pierre Saad	Independent		Male	Observer
Barbara Dalibard	Independent		Female	Voting member
Yves de Talhouet	Equity partner		Male	Observer
Simon Bouchard	KKR employee	KKR	Male	Voting member

Group and make major decisions for example the Net-Zero Goal or the decision to focus group activities on AI, with potential risk of bad ethical & security AI practices (identified as a material IRO). They sponsor sustainability initiatives, approve the material impacts, risks and opportunities and integrate them in the Group strategy and targets. The CSR Director directly reports to one of them (fortnightly meetings).

- **The Business & Operations Committee** consists of nine operational members (11% women). Lead by the Group Managing Director it includes the

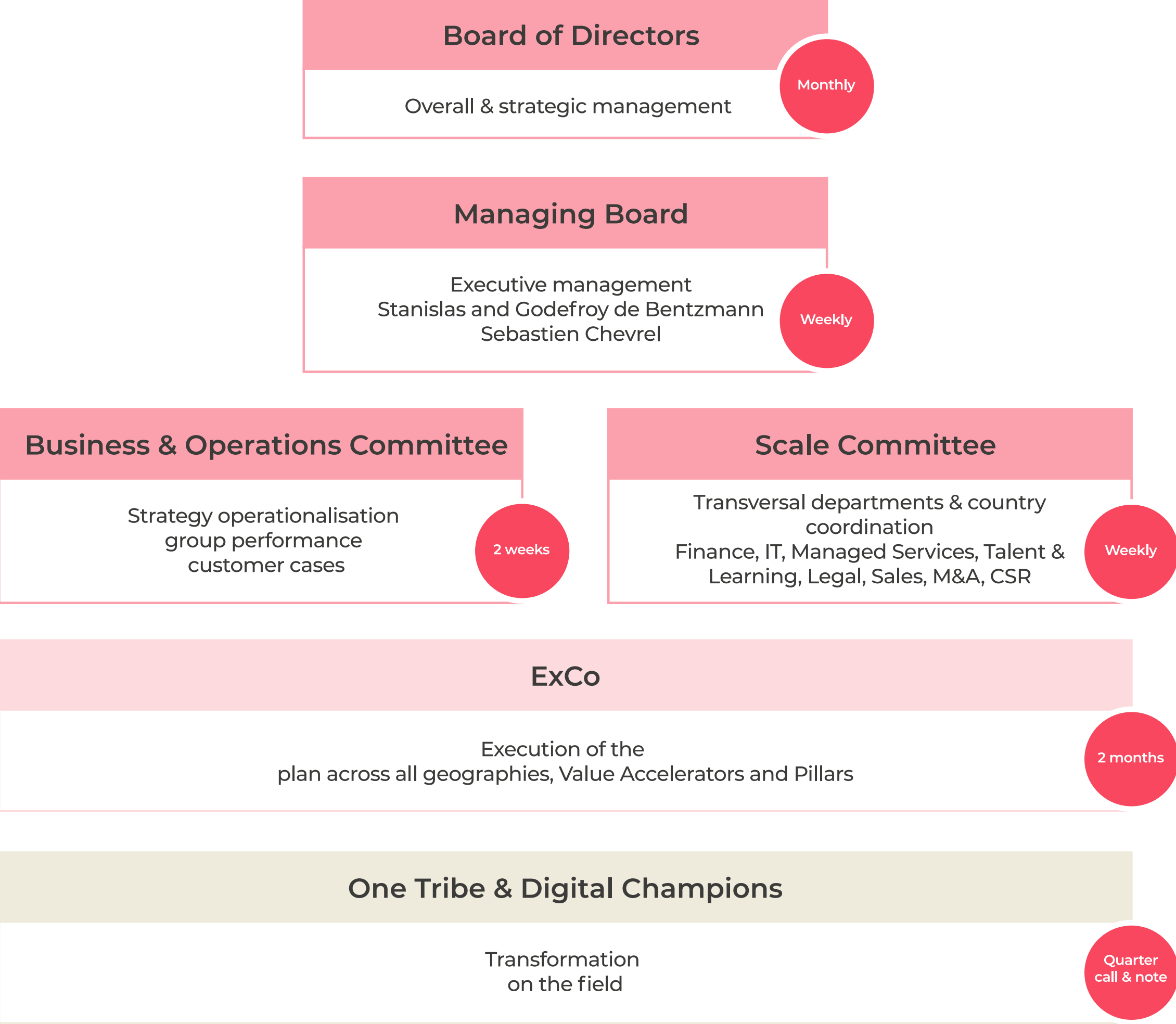
Group CFO, the deputy CFO, the MDs for our main geographies (France & North Africa, Middle East, Spain, Benelux & Serbia) and our main partner-based entities (Devoteam pillars) or offers: Google, Microsoft, Managed Services & Consulting. They meet on a fortnightly basis to operationalise the group strategy, ensure the Group performance and lead business relation. They also operate as an advisory board for the Managing Board. They define and challenge the Group's strategy, for example the Group Objectives and Key results (OKR) focusing action, including sustainability main metrics.

- **The Executive Committee** consists of the 30 top managers of the Group (13% women) including the Co-CEOs, the Managing Director, structure Directors (Marketing, Finance, HR...) and SVPs or MDs of our main entities and countries ensuring matricial discussions aligned with the Group organisation.
 - They meet every two months and drive the execution of the plan across all geographies and entities. They have all signed the code of conduct including knowledge about ethical business, and specific awareness on harassment inclusion and diversity.
80% are certified on Sustainable IT and 100% on Generative AI (including Ethics modules). They are informed at least quarterly about the material impacts, risks and opportunities and responsible for setting local sustainability plans and metrics to meet Group main ambitions.
- **The Scale committee consists of Corporate Functions** and reports directly to the Managing Board. It is made of the Group CTO, CIO, Nearshore & Managed Services, CSR, Talent & Learning, Marketing & External Communications, Finance, Controlling, Legal Counsel, Sales, M&A and the Chief of Staff (50% women).
They meet weekly to lead the Group departments and coordinate all the countries. They are highly involved in the double materiality assessment, reviewing and scoring the impacts, risks and opportunities, and managing mitigation and adaptation actions in their scope of responsibilities.
- **The One Tribe** consists of the Top 400 managers, business and tech leaders of the Group (25% of women). They lead the transformation on the field, including the integration of sustainability matters and actions at all steps, and meet virtually quarterly.

- **The Digital champions** comprises over 430 Digital Champions across 25 countries (10.5% of women). They serve as thought leaders in their respective technological domains, driving impactful contributions to our successful service activities. The Digital Champions are experts in their fields, renowned for their mentorship, knowledgesharing, and leadership in client engagements.
They meet quarterly with the One Tribe members.

2. Specific Sustainability committees

- **The CSRD Core Team** leads the alignment with the CSRD, including the double materiality assessment, the gap analysis and the sustainability reporting. During the CSRD integration project (from double materiality to operationalizing the ESG targets), they collaborate and involve all relevant stakeholders, including transversal functions, country representatives, and external stakeholders (clients, partners, suppliers). It consists of the CSR corporate team, the CSR director for France and the Group Financial Consolidation Manager (75% of women), ensuring the alignment between the departments. They meet weekly.
- **The CSR International Community** deploys CSR and Foundation local & global initiatives with a Devoteam focus. It consists of 30 local CSR managers (66% of women) coordinated by the Group CSR team and meeting monthly. They define the main sustainability objectives for approval by the top management, and monitor the relevant KPIs accordingly. They are in charge of the ESG data collection, in full collaboration with all the departments, especially Finance and Human Resources.



- **The CIM (continuous improvement meeting) community**, addresses fundamental structural issues. Meeting monthly, it is made of 11 people (55% women) and includes the corporate functions and people from their teams (data protection, CyberSecurity, Compliance, Purchase... and some country representatives) to manage sustainability, ethics and governance matters. They collaborate in the impact, risk and opportunity assessments and operationalise mitigation action.
- **The Sustainability agency** is dedicated to creating offerings & content and innovating with a customer focus. The Executive sponsor is an Executive Committee member. Core team members advocate for the overall success of the Sustainability Group Initiative by orchestrating the deployment of the Sustainable IT transversal offer portfolio in countries and across Pillars/ Value Accelerators through the proposed Target Operating Model. They take action on the alignment and formalisation of Group's Sustainable IT framework and patterns, as well as upskilling guidelines. Core team is supported by Extended Team that is composed of Sustainable IT Champions from Pillars and Value Accelerators. Extended Team members actively contribute to the deployment of Group Transversal offer in their respective entities. They provide an objective view on existing capabilities, facilitate prioritisation of value propositions for specific markets and formalisation of relevant sales materials.

The Chief Executive Officers communicate all Sustainability initiatives and strategies to Devoteam employees who are also encouraged to drive their own sustainable initiatives with their colleagues, in dedicated clubs (Earth club, Citizen Club...).

Local governance is also important to translate the global sustainability strategy locally into concrete actions. In each country, the CSR manager reports to the Country Manager on CSR goals and achievements, and works with Devoteamers in community groups to drive the sustainability agenda.

1.1.2 Integration of sustainability-related performance in incentive schemes [GOV 3] [E1-GOV-3] GRI-18

We have incentive schemes in place for the Executive Management which are linked to sustainability matters, amongst other factors. A part of the remuneration of the executive committee is based on the achievement of the OKRs (Objectives and Key results), which included in 2024 the commitment of all countries to carbon reduction targets and the attrition rate.

1.1.3 Statement on Due diligence [GOV 4]

The following table shows the paragraphs that contain disclosures about our current sustainability due diligence performance.

	Core elements of sustainability due diligence	Paragraphs in the sustainability statement
a)	Embedding sustainability due diligence in governance, strategy, and business model	Administrative, management and supervisory bodies [GOV-1] [GOV 2] Strategy, business model and value chain [SBM-1] Material impacts, risks and opportunities and their interaction with strategy and business model [SBM-3]
b)	Engaging with affected stakeholders in all key steps of the sustainability due diligence	Double materiality assessment process [IRO 1] Interests and views of stakeholders [SBM-2] Management of relationship with suppliers [G1 -2] Our policies
c)	Identifying and assessing adverse impacts	Material impacts, risks and opportunities and their interaction with strategy and business model [SBM-3] Double materiality assessment process [IRO 1]
d)	Taking actions to address those adverse impacts	<u>Actions and resources in relation to climate change policies [E1-3]</u> Actions related to Biodiversity and ecosystems [E4-3] Actions and resources related to source use and circular economy and circular economy [E5-2] Actions related to work life balance and health and safety [S1-4] Actions related to adequate wages [S1-4] Actions related to training and skills development [S1-4] Actions related to diversity, gender equality and equal pay for work of equal value, and inclusion [S1-4] Taking action on material impacts and approaches to managing Data Privacy [S4-4] Management of relationship with suppliers [G1 -2] Actions to ensure Cybersecurity [MDR-A] Our policies
e)	Tracking the effectiveness of these efforts and communicating	Management of relationship with suppliers [G1 -2]

1.1.4 Risk management and internal controls over sustainability reporting [GOV 5]

Devoteam is enhancing its sustainability reporting to align with the upcoming CSRD requirements, adopting an approach similar to its financial reporting controls. The company has conducted a double materiality assessment to identify key sustainability issues and is structuring its reporting accordingly in 2025 even if we are part of wave 2.

Devoteam’s governance structure ensures that sustainability is integrated into all levels of the organization, from the Board of Directors to operational committees with a review at least once a year. The company monitors and manages sustainability through various committees and initiatives, with a focus on data accuracy and completeness. Main professionals involved are the CIM and Scale committee for IROs definition and management, the BOC for the IROs approval and the executive committee and CSR community for the local operationalisation of retaliation actions. GOV-1 and GOV-2 describe those committees. Devoteam also engages with stakeholders, including suppliers and clients, to improve data quality and drive sustainable practices throughout its value chain.

This risk approach is managed at corporate level and breakdowned in our operational schemes in all entities (for example ISO certifications).

Main risks identified are described in the Double Materiality assessment process [IRO-1] and in the introduction of each section (ESRS S1, ESRS S4, ESRS G1, Cybersecurity - entity specific topic).

Despite challenges, such as obtaining reliable value chain data and managing uncertainty in estimations, Devoteam is committed to improving its sustainability performance and reporting, with plans for further automation and standardization in the future.

1.2 Strategy and business model

GRI 2-1, 2-6

1.2.1 Strategy, business model and value chain [SBM-1]

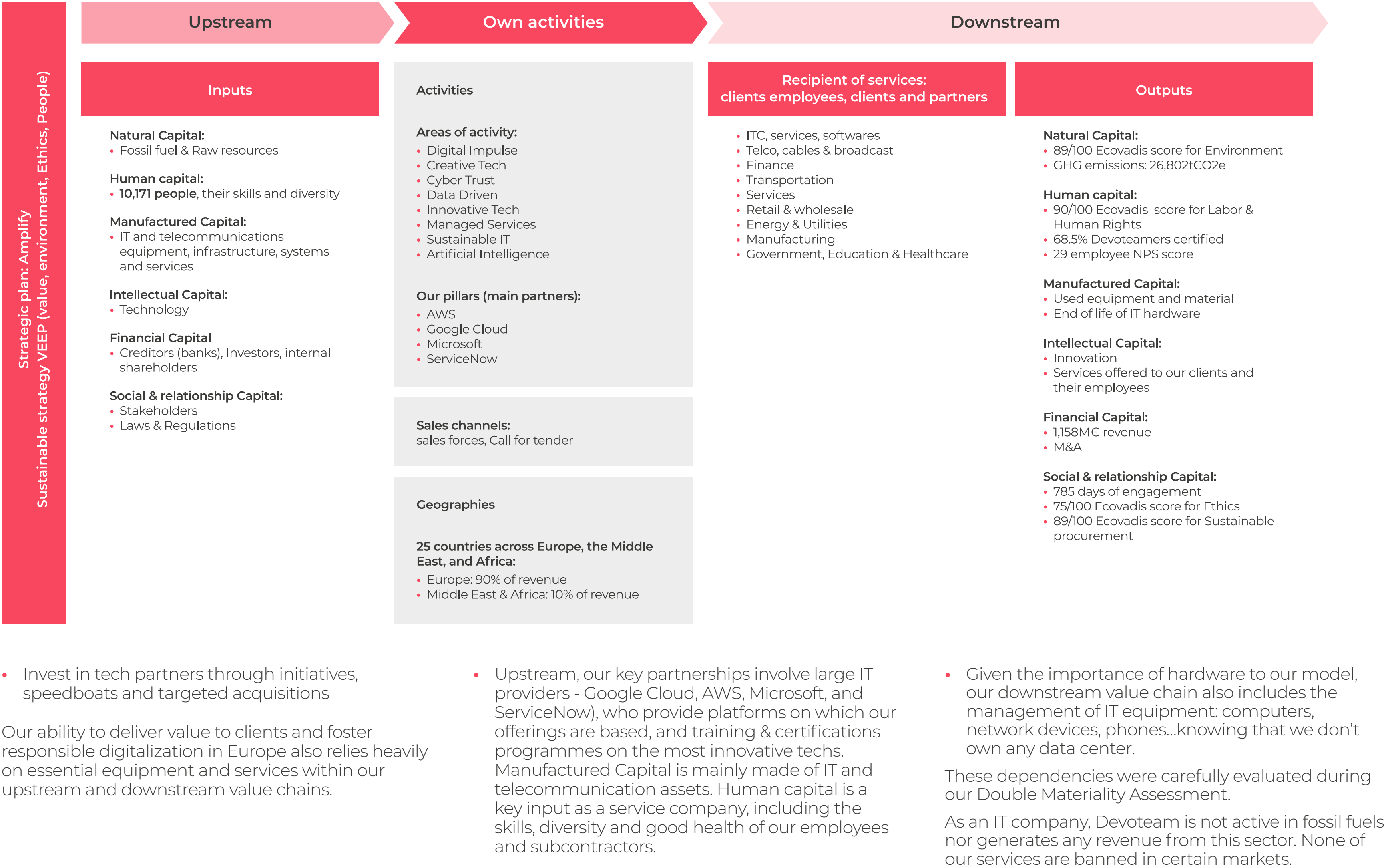
Our business model and Value chain assessment was performed using the six Capitals framework

As 100% IT service provider, our most significant impacts, risks, and opportunities (IROs) primarily arise from our internal operations, specifically concerning our 10,171 employees (31.12.2024), the distribution of whom is described in ESRS [S1-6] Characteristics of the undertaking's employees.

Devoteam operates in 25 countries across Europe (90% of the revenue - €1,158M in 2024), the Middle East, and Africa. The main services delivered are advisory on Business transformation, Strategy, Cloud, Data, Cyber Security, Digital workplace, Sustainable IT. A main transformation in 2024 was the increasing role played by AI which is a key area of development for Devoteam by 2028. To ensure this development offers sustainable value and respects our commitments, two transversal topics have specific core agencies to ensure they will serve all the business units and be included in all products: AI and Sustainability.

Based on our market positioning and analysis of our major risks and opportunities, we have formalised our business model based on sustainable performance. Our 6-step flywheel is the core of our continuous, sustainable growth model:

- Select the most innovative technologies from the leading tech partners
- Lead by hiring and retaining the best tech & business leaders, creating offers & assets
- Attract brilliant young talents and massively invest in their tech Partner skills
- Focus our sales teams on these tech partners to create more value for our customers
- Harvest additional growth & margin thanks to our tech partner focus, combined with a disciplined eagle model



1.2.2 Interests and views of stakeholders [SBM-2]
GRI 2-29

Our stakeholders are diverse and with different expectations. They consist of our current and future people (employees, subcontractors, Unions, People delegates, Students), our beneficiaries (Clients, non-profit organisations), partners facilitating our business and deliveries (tech partners, suppliers) and all our ecosystem (regulators, Supranational entities, Local communities, Civil society, Media...)

We prioritize stakeholder engagement through regular dialogue, feedback mechanisms, training programs, and sustainable practices to cultivate trust, generate mutual benefits, and foster long-term growth. The expectations of our stakeholder, how we engage with them and the value created are detailed in the table below. They were also involved in our double materiality assessment.

Stakeholders	why we engage / What they care about	How we engage	Value created
Employees, subcontractors and candidates	• Skills development • Career development • Employees/subcontractors' wellbeing and satisfaction • Engagement to the company and its values • Increase inclusion and diversity in the Tech sector	• Regular check-ins & performance reviews • Engagement Events & programmes - ex: "ask me anything" live session with managing board • Devomood: internal Engagement survey • Workers' Representatives (social committees) • Compliance and Standards: Our Code of Conduct & charters • Schools relationships: events to educate students about sustainability and technology, mentorship, internship programs...	• Offering transparent management: transparent salary grid, regular performance reviews, and open communication channels. • Ensuring Career development • Ensuring employee and subcontractors wellbeing, inclusion and safe work environments • Increasing pool of talents in the tech sector • Meeting client needs for project completion with skills & flexible, scalable workforce
Clients	• Leveraging tech to achieve their business & sustainability goals, innovating • Quality of delivery and Client satisfaction • Data protection and cybersecurity	• Formal and informal client relationship (commitments contracts, charters, regular meetings and follow ups...) • Websites, social media, newsletters, publications (TechRadar) • Seminars, events, workshops • Customer Surveys	• Improving client's efficiency • Meeting client's goals with tech • Ensuring trust and good relationships • Enhancing the company's offerings aligned with clients' expectations
Tech business partners	• Leveraging major platform companies expertise and resources for tech development • Growth opportunities • Differentiation	• Dedicated Governance (pillars) with dedicated teams to collaborate • Account planning and co-selling • Tailored certifications programmes	• Increased value delivered, innovation • Capacity building • Ensuring our employees stay at the forefront of technology
Investors and providers of capital	• Business & Margin development • Transparency • Compliance and ESG as a driver for value.	• Monthly Board of Directors • Regular exchanges between specific teams (ESG, Finance, Data protection etc.) • Monthly, quarterly, annual surveys	• Ensuring a transparent information • Increasing value delivered & positive financial return to the investors • Adjusting the strategy to the business context • Improving our sustainability reporting
Suppliers	• Ensuring revenue and growth opportunities • Securing the delivery to clients • Creating a virtuous circle in the supply chain by integrating sustainability requirements	• Formal engagement through contracts • Sustainability due diligence: CSR questionnaire to assess suppliers, Supplier Code of Conduct, Sustainable Purchase Committee	• Ensuring qualitative and resilient delivery • Ensuring a supplier selection aligned with our requirements of Safety, Ethics, Human Rights and Environmental Impact.
Communities and non-profit	• Maximising non-profit social impact thanks to tech • Offering financial support to lead non-profit programmes • Acting with key players to manage social or environmental stakes	• Skills donations: Pro bono work/skills-based sponsorship, tech for people labs • Financial donations : Call For Project, partnerships with Non-profits • Advocacy to promote Tech for Good	• Non-profit organizations achieving operational excellence through Devoteam's technical expertise. • Deployment of new solutions to increase the number of beneficiaries and services offered

1.2.3 Material impacts, risks and opportunities and their interaction with strategy and business model [SBM-3]
GRI 2-25, 3-2, 3-3

Our identified material topics are outlined in the introduction of our sustainability statement. Material IROs are the following. They are described under each topic reported on in the sustainability statements, including the timeline and value chain position.

We focused our primary risks and opportunities centered on our core operations, directly impacting our clients, employees, and infrastructure. Because these factors are closely tied to our daily work, we can actively manage them. They concern the potential skills gaps in a fast evolving technology landscape, Ethics, Data Privacy and Cybersecurity. They all have mitigation plans in place for a long time, which are described in the related ESRS, so the financial effect is minor.

Environmental concerns, like carbon emission, are recognised as global issues. However, our mitigation plans and their extent to our suppliers'ones, are considered to have a positive impact.

Other positive impacts are the investment in employee training and diversity, and the impact of responsible implementation of technology. Most of our positive impacts find an echo as opportunities for the company.

NB: The following topics are not significant in relation to the Company's activities and won't be mentioned in this report: food waste, the fight against food insecurity. This is not the company's main activity, even if Devoteam takes corrective action to reduce its impact (e.g. working with catering providers to limit waste, etc.). Respect for animal welfare has also been assessed as not material. Concerning the law of 1 August 2023 relating to military programming for the years 2024 to 2030 “aimed at promoting the Nation-Army link and supporting commitment to the reserves [...]”, the company has no general policy in place.

ESG topic	Classification	IRO short description (full description available in introduction of each relevant paragraph)
Climate change mitigation ESRS E1	Negative impact	Indirect GHG emissions
	Positive impact	Mitigation actions
Employee Conditions, Health, Safety and Wellbeing. Human rights. ESRS S1	Opportunity	Developing ESG policies and improving HR practices
	Opportunity	Skill-based hiring: unlocking innovation and diversity
Equality, Diversity, Inclusion ESRS S1	Opportunity	Opportunity of promoting a diverse, inclusive, and supportive workplace culture
	Positive impact	Impact of programmes promoting employment of disabled people
Training and skills development ESRS S1	Positive impact	Investing in employee skills training and development
	Risk	Skills gaps on ability to meet evolving client needs
	Opportunity	Fostering internal skills development
Data privacy ESRS S4	Negative impact	Personal and confidential business data exposure
	Risk	Risk of data breach
Impact of Technology Entity specific topic	Positive impact	Tech to solve SDG-linked challenges (tech for sustainability)
Responsible Business Management, Ethics, Compliance ESRS G1	Risk	Risk of bad ethical & security AI practices
Cybersecurity Entity specific topic	Positive impact	Cybersecurity training for value Chain security
	Risk	Risk of Cyber incident
	Risk	Incident caused by lack of employee awareness.

1.3 Double materiality assessment process [IRO 1]

GRI 3-1, 2-25, 205-1

1.3.1 IROs Scoring

The double materiality analysis was initiated in July 2024 following the definition of a validated process led by the ESG Team. The overall process ensured compliance with CSRD requirements, while reinforcing the Group's strategic pillars.

The process included three major phases: current state assessment to establish the value chain and relevant ESG topics, identifying the resulting Impacts, Risks and Opportunities (IROs), and finally assessing the materiality of these IROs.

Current state assessment

Devoteam has already started to integrate ESG into its processes and strategy for several years, enabling the Group to feed its double materiality analysis with a significant number of existing documents. To meet the requirements of the CSRD, Devoteam has used these documents to frame the scope of the materiality assessment and IRO identification process. The main stages of this phase were as follows:

- Mapping Devoteam's value chain, including upstream and downstream business relationships
- Review of the topics and sub-sub-topics as defined in the ESRS. During the first stage of work, Devoteam defined a set of ESG topics (or “sustainability” topics) to frame the identification of impacts, risks and opportunities. This set includes the ESRS sub-issues and sub-sub-issues as presented in ESRS 1 AR16 and identifies additional sector- and entity-specific topics that are relevant to Devoteam and its value chain.

- Identification and prioritization of documentary sources.
- Review of key ESG standards and frameworks.
- Review of key internal and public documents relating to Devoteam’s ESG strategy, including Devoteam’s risk register.
- Review of information published by peers.

IROs identification

The group then carried out an extensive identification of the relevant IROS, notably through:

- A thorough literature review and review of Devoteam’s risk register. About 20 internal and external documents (notably from former Devoteam risk assessment, partners like Google Cloud, peers, Cigref, ERM, etc.) contributed to the initial identification of IROs. The document review enabled us to identify a wide range of impacts, risks and opportunities, expressed by the Group's internal and external stakeholders.
- Analysis of the Group's value chains and their dependencies.
- Interviews with in-house experts involved in reviewing the list of IROs depended on the standard in question. They included country CSR ambassadors, HR specialists, Internal control, compliance and legal employees, IT, cybersecurity and data protection, sales specialists, communication...
- Interviews of external stakeholders representing partners, suppliers and clients to cover the entire value chain.

The process focussed on all Devoteam activities, including specific entities like BeTeam specialised in subcontractors management. The IROs were defined with a Group perspective. The initial preparation and

iterative review of the long list of IROs involved over 15 interviews and workshops involving about 30 people. The process followed was the same, whatever the standard considered. The ESG Core Team reviewed the entire list of identified IROs.

IROs Scoring

The IROs were assessed using the materiality thresholds defined by Devoteam and in particular the Risk and Finance Department. IROs were rated qualitatively on the basis of severity and probability (respectively for impacts) or magnitude (financial consequence) and probability (respectively for risks and opportunities). Material IROs are those that exceed the materiality threshold. Internal thematic experts contributed to the rating of each IRO.

The assessment of severity or magnitude and probability requires differentiation between gross and net levels:

- The gross level is the level taken into account when designing existing facilities, but independently of the measures put in place by the organization to reduce the severity of the negative impact (e.g. effluent treatment units, waste management policy, etc.) or the magnitude of a risk. From a financial point of view, the gross level is considered before expenses incurred to reduce the severity of the negative impact.
- The net level, on the other hand, takes into account the effectiveness of the actions taken. From a financial point of view, the net level considers the expenses incurred to reduce the severity of the negative impact.

Name	Date	Type
A ESG and Sustainable Development Director Services - 2,9 B€- 12,000 employees worldwide	27/11/24	Client & Supplier
A Head of sustainable IT Director Transportation - 43.4 B€ - 290,000 employees	28/11/24	Client
James Oram, Sustainability Operating Partner, KKR	28/11/24	Investor
Satiché DELAVICTOIRE, Directeur Investissement Social, Fondation AlphaOmega	28/11/24	Partner of Devoteam Foundation
A customer Engineer specialised in sustainability Digital sector - 350 B\$ - 72,000 employees	2/12/24	Tech Partner & Supplier

External stakeholders interviewed during double materiality assessment involved:

- In the case of rating in the context of CSRD, the following levels were taken into account:
- For potential impacts, risks and opportunities: gross rating, without taking into account mitigation or compensation actions.
 - For actual impacts: net rating. Thus, control measures implemented by the Group to reduce the severity of certain impacts can only be taken into account for impacts that have already occurred.

Positive impacts or opportunities cannot compensate for negative impacts or risks. They are presented and assessed separately.

Probability, assessed in a second phase, follows the same scoring principle between net and gross.

The process followed was the same for all standards. The internal stakeholders involved in scoring the list of IROs depended on the standard considered, as well as on the typology of IROs.

The assessment of IROs leads to a conclusion on the materiality of each IRO. Thus, an impact, risk or opportunity is material when its ratio of probability and severity (or potential financial consequences) is high in relation to the materiality threshold determined, in agreement with the Group Risk function.

1	2	3	4	5
State Assessment	IROs Identification & interviews	IROs scoring	Internal approval	Goals & KPI follow up



1.3.2 List of disclosure requirements met [IRO-2]

The table outlining the disclosure requirements met is listed in [appendix 4](#)

1.3.3 Table of all data points deriving from other EU legislation [IRO-2]

The table outlining the data points derived from EU legislation is listed in [appendix 5](#)

2. Environmental Information

2.1 [ESRS E1] Climate change

[E1-SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model

As an IT company and data centre user, we know our work affects the environment. Essentially.

While we do contribute to climate change (negative material impact), this negative impact is mainly indirect regarding our activities. However, we recognise that IT and data usage has a big impact and we are implementing mitigation actions along our value chain (positive impact): reducing our energy use, working with partners to align our climate goals and actions, and helping clients go green.

From now we have not identified any transition risk in the near term, but the risk concerning clients expectations could raise in the future; it will be confirmed during next DMA review. Resilience analysis was performed in 36.5% of our sites (cf ESRS E1-IRO1). No physical risk was identified regarding our business model and locations.

		Value chain location			Time horizon		
		Upstream	Own operations	Down-stream	Short term	Medium term	Long term
Indirect GHG emissions: The impact of the indirect release of greenhouse gas emissions, linked with Devoteam’s purchase (upstream emissions) including business travels and IT, or clients’ use of tech, especially with Gen AI development (downstream emissions), leading to increases in global average temperatures and changing weather patterns.	Negative impact	X		X		X	
Mitigation actions The impact of transitioning to more sustainable patterns, including electric transportation, heating, and moving to renewable energies, leading to participating in the global transition by achieving our SBTi reduction goals, resulting in CO2 emissions reductions.	Positive impact	X	X	X		X	

[E1- IRO-1] Description of the processes to identify and assess material climate-related impacts, risks and opportunities

To understand our environmental impact, we’ve consulted with our own teams and outside environmental stakeholders and clients, as described in our DMA process.

In addition to our DMA, more and more countries are also engaged in implementing ISO 14001 principles and some get certified. This implies supplementing environmental analysis at local level. 56.4% of our employees are covered by an ISO 14001-certified environmental management system in 2024.

36.5% of our buildings are also audited on environmental risks. (and 47% for Devoteam SAS)

2.1.1 Policies related to climate change mitigation and adaptation [E1-2]

The 2015 Paris Agreement commits governments to curb global temperature rise. To achieve this, the Intergovernmental Panel on Climate Change recommends halving emissions by 2030 and reaching net-zero by 2050. This requires avoiding emissions, restoring ecosystems, and innovating low-carbon solutions. Ecosystem restoration is vital to mitigate climate change, preserve biodiversity, and halt environmental destruction.

In our **Environmental policy**, applicable in all Devoteam geographies across the group, we pledge to innovate, collaborate, and lead in the fight against climate change, ensuring a sustainable future for all. Devoteam is committed to strong and collective action to address the environmental crisis, focusing on climate change and biosphere integrity. We will lead by example, extending our positive impact to our clients and the wider digital sector.

Guiding Principles:

- 1. Transparency:** We communicate our progress yearly, maintaining open and honest reporting.
- 2. Prioritization of Reduction:** With our science-based targets aligned with a +1.5°C scenario, we prioritize reducing our carbon footprint through continuous improvement and targeted actions.
- 3. Global and Local Action:** We combine global targets with local roadmaps. Local representatives drive concrete action.
- 4. Value Chain Commitment:** We engage our entire value chain, working upstream with suppliers and promoting sustainable offerings downstream to amplify our impact.
- 5. Compensation of Remaining Emissions:** We will invest in nature-based and tech-based carbon removal processes to compensate for remaining emissions.
- 6. Employee Engagement:** We empower our employees with knowledge and encourage their active participation in our sustainability efforts.

2.1.2 Actions [E1-1] [E1-3]

[E1-1] Transition plan for climate change mitigation

While defining our Science-based targets, we already took decisive steps in our reduction journey across operations.

The 2024 priority was to create targets for all the countries with a commitment of the country manager.

Regarding the plans, focuses were on the company car policy (work still on progress in some countries),

supplier engagement to continue improving data collection and measure, using more physical/providers data than previous years, and resulting in a more accurate baseline for decision making.

The transition plan is in process of formalisation: for 2025, each country will create their individual roadmap based on the country’s previous emissions, their situation and their abilities so actions are realistic at the same time the common goal can be achieved. These country roadmaps will be followed-up to monitor the results.

[E1-3] Actions and resources in relation to climate change policies
GRI 305-5

Travel Management

Business Travels

We recognize that face-to-face interaction is valuable for collaboration and relationship building. However, we also acknowledge the importance of reducing travel and adopting new ways of collaborating. Our Group Business Travel policy launched in 2023 is based on three core principles:

- Reducing Travel:** We favor video conferencing, limit internal conferences and non-EMEA travel, and optimize trips by scheduling multiple meetings in one journey.
- Choosing Sustainable Options:** We prioritize environmentally friendly travel options (train or car sharing when possible). This is for example the case of Indonesia setting up carpooling for attending the meetings at the same place and time. We also strongly encourage and incentivize sustainable commuting solutions like biking, walking, and using public transportation.

- Engaging Our People:** We involve our employees in this change by showing the CO2e impact of travel during the booking process and creating challenges to promote low-carbon commuting. For example, in Czech Republic and Slovakia, employees participated in the “Bike to Work” initiative, raising awareness of available facilities like garages and showers to encourage cycling to work while Denmark organized a Bike Challenge during Earth Week 2024 and UK a step challenge during the summer 2024.

Company cars

Regarding car company fleet, the countries counting the most important number of company cars per employee have run assessment or will run it in 2025 with the objective of

- Reducing the total number of company cars:** Some countries have already stopped providing company cars, others like France have set a transition plan.
- Moving away from fossil cars:** Where company cars are still necessary, we are progressively transitioning to hybrid or electric vehicles and extending lease durations to reduce the environmental impact of car manufacturing. Portugal, for example, has eliminated diesel cars from new rental contracts since 2024, and is installing more electric vehicle chargers at the office. Austria, Belgium, Germany and Netherlands are replacing company cars with electric vehicles only at the end of their lease periods.

Commuting

The company is promoting sustainable commuting by incentivizing its employees across different locations.

For example, in Austria the company promotes the use of railways and public transportation for commuting to work or customer sites, offering ‘Klima-Tickets’ (Climate tickets) for an annual usage of all public transport in Austria. Similarly, the Czech Republic and Slovakia emphasize the accessibility of its offices by public transport. Spain also promotes the use of public or sustainable transport options like bicycles and scooters to reduce commuting emissions.

Promoting sustainable commuting was also a criteria for relocating most of the offices in the center of cities and close to public transportation hubs.

The output is a reduction of our travel-based emissions over the years (-13% in 2024 vs. 2023), with disparities: the commuting and business travels are reducing when the company cars emissions are still increasing, with a lower rate. The new policies described above should give results in the next three years.

Purchase of services (GRI 308-1)

40% of our environmental footprint stems from purchased services, like in 2023, and the gross amount has decreased. Such result is an output of our focus on two key areas: improving emissions tracking related to our purchases with a sustainable purchase questionnaire sent annually to our providers, and reducing emissions by integrating sustainability criteria into our procurement process.

In 2024, we sent our sustainability assessment, including carbon reporting, to all our top current and potential providers.

We’re also committed to redefining our selection criteria to prioritize suppliers with strong environmental policies (for example good environmental Ecovadis scores) and CO2e emissions reduction plans.

We also implement circular economy principles throughout our business. For example, our marketing teams worldwide have formalized sustainable guidelines to promote responsible events and reduce promotional items. Our catering partners for Devoteam events are chosen for their sustainable offerings, such as vegetarian and vegan options, and seasonal, local produce (e.g., vegetarian breakfasts in France, and vegetarian meals at all events in Sweden including the three days conference **ØreDev**).

To go further, we also support with Devoteam Foundation, NGOs working in climate change mitigation like The Good Goal, Mollow, Plant On Demand and ProVeg. Devoteam France has also implemented a “No goodies” charter to encourage more sustainable gift-giving.

Our sustainable purchase policy is described in **G1-2**.

IT Equipment and Digital services

In 2024, IT equipment and digital services represented 12% of Devoteam Footprint and decreased by 42% vs 2022 (base year). A part of the decrease is due to better provider information (cf below).

Even though this decrease, it remains a significant area of focus for both our internal operations and our client services. We’re committed to continuing our work in this area in collaboration with our IT partners. Here are some key focuses:

- **Raising Devoteamer Awareness**, to reduce our own footprint, and influence broader change as Sustainable IT is part of our customer offerings: 3,600 of our Devoteamers have certified in Sustainable IT in 2023 and 2024 and we regularly conduct “Sustainable IT Tips” campaigns to encourage less emitting behaviors related to email usage, storage, and presentations. The last one was led in December 2024. Our IT portal shows a carbon footprint view for 33% of our IT assets so employees can see the CO2e emissions associated with new devices, not just the cost. It will be

completed in 2025. The update of the IT charter including sustainability matters is planned for 2025.

- **Focusing on the IT Department** to embed sustainability into all internal operations, starting with the purchasing process. A specific version of the IT charter for IT team members is planned for 2025.
- **Improving Calculation Methods to increase our carbon footprint accuracy:** We’re enhancing our calculation methods by using more physical data and getting more and more data from our providers. For instance regarding the French scope, we got accurate data for 90% of devices vs 55% in 2023. Regarding the Corporate team hardware emissions, 100% of them were populated with providers or market accurate data. It is still more complicated for software and SaaS : 38% of accurate data for the corporate team (vs 25% in 2023) which covers however 85% of our licences and usage. Such improvement makes it possible to lead further discussions on improvement plans with our main providers.
- **Take advantage of tech to reduce emissions: for example, with “My Inbox Is Green” Solution**, created by Devoteam G Cloud, the user can automatically delete old emails using personalised criteria and labels. With this application, we deleted more than 745 thousands emails in 2024 and close to 11 million since its launch in 2021. Devoteam is working towards greater transparency in energy usage for our services. Our Group IT department monitors the carbon footprint of our IT tools, including GenAI applications like Gemini, using Google Workspace usage reports. While no significant increase has been observed yet due to the newness of the technology, we are actively tracking consumption levels for the future.

Offices management and energy consumption

Since the onset of the pandemic, Devoteam has embraced new working models, including hybrid and flexible arrangements. This shift has prompted a significant overhaul of our office spaces over the past three years. We’ve prioritized locations that are both environmentally friendly and easily accessible via public transportation. To better align with our evolving work styles, many offices have been downsized relative to the number of employees, reflecting the increased prevalence of remote work and work at client sites.

In the last three years, numerous Devoteam offices across Europe and North Africa were relocated or renovated to meet these new standards. Our headquarters in Levallois-Perret (113 rue Anatole France) was reopened in 2024 after complete renovation featuring a range of sustainable elements, such as a vegetable garden, rainwater reuse systems, enhanced insulation, and electric charging stations. When possible, such relocations were the opportunity to downsizing the office with potential energy savings, for example in Malmö offices in October 2024.

We’re also placing a strong emphasis on energy efficiency. This includes optimizing heating and air conditioning systems, investing in energy-efficient appliances, and selecting energy-efficient buildings. For example in July 2023, Devoteam Belgium consolidated two office locations into “The Wings,” a new, highly sustainable building, incorporating advanced technologies to minimize energy consumption, including Belgium’s first commercial application of geothermal energy, which is expected to reduce CO2e emissions by 70%. Italy has done a similar move in December 2024 with output expected for 2025. The company also optimizes existing infrastructure by upgrading to energy-efficient appliances and implementing energy-saving

measures like LED lighting (for example in Spain, France...) and automated air conditioning shutoff (Indonesia). Devoteam Germany's buildings are ISO 50001 certified and the Lithuanian team also chose an ISO 50001 certified office.

We also replace, whenever possible, our current electricity contracts with renewable electricity ones. Finally, Devoteam employees are made aware of the need to save energy. In France, eco-gestures and nudges encourage them to consume electricity more responsibly and consciously (turning off lights behind them, switching off electronic devices when not in use for more than an hour, etc.).

With such efforts, our building emissions decreased between 2023 and 2024 (-16.6%) but are still higher than in 2022 (base year). We want to accelerate our actions especially on electricity, together with the buildings' owners as we rent most of our offices.

People awareness, education & engagement

Devoteam fosters a culture of sustainability and climate change awareness among its workforce through diverse initiatives and educational programs. Two key highlights are the annual Earth Week celebration (April) and Devoteam Sustainable Development Month (October). Over 4,000 employees engaged again, in 2024, in activities like webinars, workshops, and photo challenges, sparking discussions around Devoteam's climate goals. Furthermore, Devoteam provides targeted training and educational opportunities across its different locations. Belgium offers dedicated sustainability training sessions, while Germany integrates CSR education into new employee onboarding. Italy focuses on climate change and energy consumption awareness, Lithuania provides a specialized Sustainable IT seminar, and Luxembourg leverages

Earth Week and Sustainable Development Month for broader awareness. Additionally, Sweden incorporates sustainability into regular team meetings, the UK runs environmental sustainability email campaigns, while Portugal prioritizes employee certifications in Sustainability IT Fundamentals. Devoteam A Cloud in France, included in the welcome journey the participation of all newcomers in a Digital Collage workshop to raise awareness about environmental impact of IT. These combined efforts demonstrate Devoteam's strong commitment to environmental responsibility and empowering employees to contribute to a sustainable future.

2tonnes training

In 2024, Devoteam took another proactive step in climate action by training ten facilitators to lead the "2tonnes" workshop. This educational and collaborative initiative focuses on raising awareness and driving action against climate change. Participants work together to create a carbon reduction plan balancing individual and collective actions. The latest version of the workshop broadens the discussion to include environmental and social challenges, drawing on Kate Raworth's Doughnut Economics theory. By training internal facilitators, Devoteam aims to embed this understanding and action-oriented approach within the company culture. After this training, five 2 tonnes workshops were organised in 2024 to raise awareness among Devoteamers and more are planned in 2025.

Such workshops are a complement to other awareness raising sessions where we have certified facilitators like climate fresks or digital and biodiversity collages.

Upskilling on Sustainable IT (GRI 302-5)

Recognizing the climate emergency and the significant environmental footprint of digital technology, as well as the critical need to promote inclusive and ethical values in our digital practices, we launched a global Sustainable IT certification program in 2023. This program, built on partner MOOCs and platforms, aims to equip all Devoteamers with the knowledge to act sustainably in their daily work and integrate sustainability into all our customer deliveries. The program consists of two modules.

- Level 1 utilizes the Sustainable IT MOOC from the Institute for Sustainable IT (INR/ISIT), a leading authority in the sustainable digital ecosystem. This mandatory four-hour training informs employees about sustainable IT practices, empowering them to make responsible choices daily. Successful completion of an e-learning module, achieving at least 80% (32 out of 40 questions), results in an internal certification. In 2024, 3,250 employees worldwide completed Level 1.
- Level 2 offers the Green Software for Practitioners - LFC131 certification from the Linux Foundation. This course focuses on training software practitioners in green software principles, including ecological considerations, standardized terminology, and applying these principles to software design and development. In 2024, nearly 400 employees completed Level 2.

Our objective is also to embed sustainable IT in all our activities and technologies. We have included specific sustainability modules in AI training for all Devoteamers to ensure the development of such tech is aligned with our commitments.

Eco-design training

Devoteam France runs eco-design training for digital products and services. This program equips designers to integrate best practices, understand eco-design challenges, and identify poor practices. Trained designers can audit applications, advocate for digital sustainability, and create eco-designed products using criteria from RGEN, Ethical Designers, Green IT, and GR491. Over 72% French design tribe were trained in 2024, and we aim to expand this training.

Sustainability training program included in career path

		
	Internal certification Sustainable IT	Eco-Design
Standards	Sustainable IT MOOC - ISIT	RGESN RG491-Designers Éthiques-Green IT
Lenght	3 hours + 40 questions Get > 80% correct answers	4 hours for PMO 4 hours for designers
Targets for 2025	100% of Group ExCo 80% of employees	100% of the Tribe
Results until now	80% of Group ExCo 500 people in France	100 trained designers (72% in France)

Supporting nonprofit organizations working against Climate change

ID Vilnius is a strategic partner of the Vilnius municipality and its companies, striving to create a modern, efficiently administered city by collecting and providing data. They sought innovative approaches to their project management to better serve the city residents and its companies. In the Autumn of 2024, Devoteam Foundation Lithuania made a TechForPeople Lab with ID Vilnius, sharing expertise on modern ways of working and Product Lifecycle Management. The focus was on innovative approaches and streamlining operations. This gained valuable insights and expertise in how to optimize processes and projects and thereby contributing to their goal of creating a modern, efficiently administered city.

Client cases

Measuring Digital Carbon Footprint at CNAM

In 2022, the National Health Insurance Fund (CNAM) launched a project to assess and reduce the carbon footprint of its digital activities. The CNAM partnered with Sopht, a Green IT Ops solution, and Devoteam to measure, analyze, and identify actions to minimize the environmental impact of its IT operations.

CNAM defined its scope, including measuring the digital carbon footprint, implementing digital efficiency for workstations, addressing data centers, and integrating responsible digital practices into IT projects (eco-design starting in April 2024). The initial step was measuring the current digital carbon footprint, including workstations, data centers, and

equipment, to establish a baseline. It took 6 months and included methodology evolutions and platform adaptations for the CNAM’s context & infrastructure (6 data centers, 500 locations, and over 100,000 workstations), with the support of Devoteam to clarifying needs and implementing features .

Due to limited resources, CNAM needed a partner to coordinate the project, collect data, and integrate it into the platform. This required technical skills, patience, and diplomacy. Key challenges were ensuring inventory accuracy and assessing carbon impact. Devoteam worked with repository managers and obtained Product Carbon Footprints from manufacturers. Methodological diversity and managing uncertainty also presented challenges, requiring Devoteam’s expertise.

Initial results showed workstations have a greater carbon impact than data centers, highlighting the importance of responsible purchasing and extending equipment lifespans. Consequently, responsible digital clauses were added to calls for tender. CNAM is considering the circular economy through internal reconditioning and reevaluating the 5-year depreciation policy. Identifying effective decarbonization levers is challenging. Next steps include improving inventory quality, automating data and expanding the hardware scope.

Managing ESG performance - large cosmetic company

Our client, a large cosmetic company, wanted to acquire a tool for managing its extra-financial (CSR) performance in order to collect data (around 50 KPIs) from brands and countries, and monitor the objectives set out in its sustainability plan.

Devoteam created for them a web application to collect CSR data on each quarter and visualize them through several dashboards which allow the customer to monitor its CSR performance. The web application is based on Google Cloud services and

connected to the customer’s datawarehouse in order to automate the data collection , including GHG data. Looker serves as BI software to visualize the client’s extra-financial data at a global level.

With this solution, our clients benefit from a unique and single source of truth tool to collect and visualise CSR data for the whole Group, allowing users to monitor and share progress through common and standard reports.

2.1.2.1 Targets related to climate change mitigation [E1-4]
GRI 305-5

In August 2024 , the Science Based Targets initiative validated that the science-based greenhouse gas emissions reductions target(s) submitted by Devoteam conform with the SBTi Corporate Net Zero Standard.

SBTi has classified our company's scope 1 and 2 target ambition as in line with a 1.5°C trajectory.

- Overall Net-Zero Target: Devoteam SAS commits to reach net-zero greenhouse gas emissions across the value chain by 2050.
- Near-Term Targets: Devoteam SAS commits to reduce absolute scope 1 and 2 GHG emissions 33.6% by 2028 from a 2022 base year. Devoteam SAS also commits to reduce scope 3 GHG emissions 44% per million EUR value added within the same timeframe.
- Long-Term Targets: Devoteam SAS commits to reduce absolute scope 1, 2 and 3 GHG emissions 90% by 2050 from a 2022 base year.

Scope	Base year (2022)	2023	2024 (evolution vs base year)	2028 target
Scope 1 + 2 (market-based approach) tCO2e	3,984.74	4,734	4,609 (+16.4%)	2,685.86
Scope 3 tCO2e per M€ of operating margin	306.48	212.35	186.43 (-39.6%)	171.5

2.1.2.2 Metrics related to climate change
[E1-5] [E1-6] [E1-7] [E1-8]

[E1-5] Energy consumption and mix
GRI 302-1, 302-3, 302-4

Energy usage for offices (1) Net emissions (market-based) 1,357.52 tCO2e (5% of total group emissions) -16.6% vs 2023 4.35 m2 per FTE (-2% vs 2023)	
Total Electricity consumption Group : 3,355 MWh(2) +5.3% vs 2023	Renewable electricity Group : 1,756 MWh(2) 52.3% of Devoteam's electricity including 100% of Devoteam France's electricity (3)

1. Including electricity, heating, air conditioning consumption and leaks.
2. Including only electricity and air conditioning consumption. Some buildings are excluded from this energy consumption sum, but their CO2e emissions were then estimated from the number of m2 and source of energy.
3. When Devoteam controls the contract

[E1-6] Gross Scopes 1, 2, 3 and Total GHG emissions

Our 2024 Carbon footprint
(GRI 305-1, 305-2, 305-3, 305-4)

Total: 26,802 tCO2e market-based	Scope 1: 3,389 tCO2e
2.64 tCO2e/HC	Scope 2:
0.0186 tCO2/K€ revenue	Market-based: 1,220 tCO2e
-78.12 tCO2e excluded (purchase of offset computers & recycling of waste)	Location-based: 961 tCO2e
	Scope 3: 22,193 tCO2e
	Upstream: 22,193 tCO2e
	Downstream: 0 tCO2e

Footprint realized with **WeCount** under the GreenHouse gas (GHG) protocol. The methodology is described in Appendix.

Breakdown per geography is available in appendix, as well as the evolution of the carbon footprint over the last 3 years.

GHG Scope	Type of control	Emission sources
Scope 1	Emissions under operational control	Stationary fuel combustion, company-owned and leased vehicles
Scope 2	Indirect emissions from purchased energy	Electricity, heating, and cooling
Scope 3	Other indirect emissions	Business travels, Commuting, IT, other purchase

[E1-7] GHG removals and GHG mitigation projects financed through carbon credits

Devoteam wants to focus first on the mitigation actions and has not yet financed GHG removals. However, we are acting for biodiversity, and especially running some planting programmes (cf ESRS E4). We are also buying some hardware that is already compensated (cf ESRS E5).

[E1-8] Internal Carbon pricing

To date, Devoteam doesn't apply any internal carbon pricing scheme.



2.2 [ESRS E4] Biodiversity

2.2.1 [E4-2] Policies related to Biodiversity and ecosystems

No material IRO concerning Biodiversity and Ecosystems was identified during Devoteam **Double Materiality assessment** regarding our activities and locations. However, the Group voluntarily wants to play its part in addressing Biodiversity restoration and protection, in collaboration with Partners.

2.2.2 [E4-3] Actions related to Biodiversity and ecosystems

1. Supporting nonprofit organisations and scientific projects for biodiversity with financial and skills donations:

- **CREA Mont-Blanc** is a research center for Alpine ecosystems, specializing in the study of natural mountain environments, that Devoteam has been supporting since 2019. In order to get more data to deepen, improve and make their research more efficient, CREA Mont-Blanc see a growing need for advanced technological solutions. The Devoteam Foundation supported CREA Mont-Blanc by developing tech solutions for automatic monitoring and interpretation of mountain environments, as well as providing funding for participation in larger research projects. With this, CREA Mont-Blanc gained access to technology that enabled them to collect more data and interpret mountain environments and predict future changes. The funding from Devoteam Foundation France allowed them to participate in larger research projects, expanding their ability to share insights and knowledge with wider audiences.

- **Fabrice Amedeo - Vendée Globe 2024:** Offshore racing can also be a tremendous opportunity for science and the environment, as demonstrated by the sporting and scientific feat accomplished by Fabrice Amedeo and his non-stop round-the-world voyage during the last Vendée Globe. He equipped his boat and carried measurement instruments to undertake ambitious projects to help the scientific community better understand the impact of climate change on our oceans. Devoteam supports him in his overall action:
 - **Oceanographic Project:** Collecting data on ocean temperature, CO2, salinity, and analyzing the presence and dispersion of microplastic, biodiversity mapping via an environmental DNA sensor. Devoteam will also assist with data analysis.
 - **Educational Project:** Raising awareness among students about ocean preservation with digital educational support and his educational boat accessible to children (and adults!).
 - **Energy Transition:** A round-the-world voyage completed without fossil fuels, thanks to wind turbines, solar panels, and hydro generators.
 - **Solidarity Project:** €1 donated to associations for each nautical mile covered.

2. Acting for bees preservation:

- **Un Toit pour les Abeilles - France:** Since 2022, Devoteam France has partnered with “Un Toit pour les Abeilles”, a network of around 100 beekeepers who promote local, artisanal beekeeping that respects bees. We have been supporting the Castle of Rambouillet apiary. The beehives are installed in the grounds of the castle managed by the Chambord estate. This is a 980-hectare park in the heart of the

Rambouillet forest. There are many lime trees, as well as acacias and chestnut trees.

- *Up to 180 000 bees in summer*
- *37,5 kg of honey in 2024*
- *150 kg of honey since 2022*

- **BeeFarm - Sweden:**

BeeFarm is a social entrepreneur that addresses the issue of declining pollinating insects, such as bees, which pose a threat to biodiversity and food production. BeeFarm connects farmers and bee owners, facilitating the placement of beehives near fields to enhance pollination. The challenge BeeFarm faced was the need to collect data measurements to provide concrete evidence that the presence of beehives around the fields actually resulted in increased harvests. In Autumn 2024, Devoteam Sweden conducted a #TechForPeople Lab in collaboration with BeeFarm focusing on developing a system for collecting and analyzing data related to insect populations and harvest yields. The work done by Devoteam Foundation Sweden gave BeeFarm insight on data needed to demonstrate and bring proof of the positive impact and of the action.

3. Planting trees:

- **Blossom engagement (Group):**

in 2018, Devoteam launched the “Blossom Engagement program” which is included in the recruitment process: each new employee has the possibility to plant a tree and choose the project they want to support. By the end of 2024 Devoteam had supported biodiversity at a worldwide scale by funding the plantation of 9,225+ trees for 13 projects of reforestation in Haiti, Indonesia, Portugal, Morocco, Peru, France, Spain, South Africa and Madagascar Behind this material positive impact is a way to engage Devoteamers in biodiversity.

- **Myliu mišką (Lithuania) Devoteam joined the cause:**

together with other members of the Unicorns Lithuania association, they contributed and planted 2 hectares of forest with 6000 trees. During one day, Devoteam Lithuania contributed by planting 162 trees.

- **Ecologi (Sweden):**

Procori, which in 2024 became part of Devoteam, has been a Climate Action Workforce subscriber with Ecologi since 2022, intending to plant one tree per invoiced working hour and fund tree planting for every customer delivery and project. Since joining, they have supported 16 reforestation initiatives and contributed to the planting of over 40,000 trees while mitigating more than 1,000 tonnes of CO₂. In 2024, Procori funded 2,000+ trees and actively supported three key reforestation projects: Afromontane reforestation in Mau, Kenya, Mangrove planting in Kandrary, Madagascar, and reforestation in Gewocha Forest, Ethiopia, all being certified by either the Gold Standard or Verra's Verified Carbon Standard (VCS).

- **Tree App:**

In partnership with the global tree planting organisation Tree App, Devoteam UK, supported 2000 trees to be planted in 2024. That equaled 20 planted trees for every 'Well Architected Review' that is carried out within the AWS (Amazon Web Services) practice.

- **Ana and Vlade Divac Foundation:**

Devoteam Serbia participated in a Business Run initiative where employees took part in a 5 km Business Race. For each of the 40 devoteamers participating, the company donated funds to support a tree planting for reforestation. The Business Run was taken by the Ana and Vlade Divac Foundation that by this initiative were able to plant 4.5 hectares of forest in Fruška Gora National Park.

2.3 [ESRS E5] Resource use and circular economy

2.3.1 [E5 IRO-1] Resource use and circular economy IROs

No material IRO concerning resources and circular economy was identified during **Devoteam Double Materiality Assessment** regarding our size, activities and locations. As a service company, Devoteam uses few resources. However, we acknowledge we are generating e-waste: computers, phones, tablets, screens, TVs, video conferences devices, network equipment, printers. This doesn't concern Data center material as we don't own any. This concern could turn material in the future. Consequently we want to disclose voluntarily on waste, especially e-waste.

2.3.2 [E5-1] Policies related to resource use and circular economy and circular economy

Although Devoteam activity is not generating massive waste, the Group commits to limit its impact and encourages recycling in all the countries. One of the main goals is to cut down on e-waste: we target 90% of our tech devices to be reused, donated or recycled. Such a goal requires us to work closely with local partners to manage the end of life of our assets. When possible, we combine our efforts to recycle with other social actions. For instance Devoteam France partnered with 2 Disability Friendly Companies, both employing mainly people with disabilities, or in a situation of professional reintegration : ATF Gaia to recycle WEEE & Elise for non-hazardous waste (paper, plastic, cans, cigarettes...). Raising awareness among

our workforce and integrating eco-friendly practices are also at the top of our priorities.

2.3.3 [E5-2] Actions and resources related to source use and circular economy and circular economy

GRI 306-1, 306-2

1. Increase the lifespan of our IT devices to reduce e-waste

Devoteam is committed to increasing the lifespan of its assets with several actions.

During the purchase phase, we favor TCO and Energy Star certified computers (100% of French and Corp computers for example)

During the usage phase, Devoteam trains all of its employees in good digital usage practices, to extend the life of its assets (regularly switching off computers, ensuring updates are completed , protected correctly when being moved).

The Group IT charter makes particular mention of “Participatory approaches to sustainable development” and invites all Devoteamers to adopt an eco-responsible approach from the moment they join the company, through its values (Respect, Collaboration, Ambition, Frankness, Entrepreneurship) and its measures: print responsibly (limit prints, double-sided, 2 pages per sheet, B&W, etc.), take care of their computer & electronic equipment (compliance with the eco-responsible principles disseminated within the Group), and return defective equipment so that repair and recycling can be carried out to be done under appropriate conditions. In order to extend the lifespan of the equipment made available, the user must carefully maintain it while respecting the eco-responsible principles

disseminated within the Devoteam group (vigilance on the charging and discharging of the battery from the computer for example...).

Some countries have already increased the life-time policy of their assets. For example, the Czech Republic and Slovakia increased it to 4 years.

For the end of life, we have four paths:

- repairing devices for internal reuse (100% of computers are reconditioned until their performance can no longer guarantee adequate working conditions),
- Donations to employees or NGOs
- Refurbishing: they are then either handed over to the broker, or donated to associations or schools. In 2024, Ecologic collected and recycled 100% of Devoteam France’s digital equipment. Ecologic is a government-approved eco-organization. Among other things, it oversees the national recycling program for electrical and electronic equipment. Since 2006, it has been contributing to the development of a circular economy throughout France, based on information and awareness-raising, repair, reuse, collection and processing of products and waste.
- Recycling

2. Reduce and recycle general waste

On top of e-waste, Devoteam entities take action to reduce wastes and raise awareness among our workforce, integrating ecofriendly practices: office recycling garbage cans, reusable dishes, minimising packaging and plastic (for example in the coffee machine), reducing printing and using recycled paper. Sorting waste to recycle is implemented in all countries even if the waste infrastructure of the different cities does not always provide the exact waste figures.

ØreDev: Keeping a low carbon footprint and strengthening knowledge to the community

Øredev is an international developers conference held annually in Malmö, Sweden. It is one of the largest developers conferences in the Nordics, supporting knowledge sharing in the community. The conference features multiple tracks, covering topics such as software development, data, AI security, emerging technologies, among others. Øredev was founded in 2005 by Jayway, called Devoteam Creative Tech today, to strengthen knowledge in the front edge of technology in the local community In 2024, Øredev hosted 111 speakers and 1100+ participants who could listen to 120+ sessions under the theme Connect the Dots and also network and share experiences. To minimize the conference’s environmental impact, only vegetarian and vegan food served on biodegradable paper plates with wooden utensils, and reusable water bottles were distributed to attendees and speakers to replace disposable cups. The venue for ØREDEV is certified in sustainability and placed close to bus and train stations to make it easy for people to commute by public transport.

3. Support clients and non profits in reducing Waste impact

Suez SludgeAdvanced: Circular Economy Powered by Code

The Challenge

With a history spanning over 160 years, SUEZ is a market leader in the utilities and waste management market – providing its customers with access to water and waste services, through resilient and innovative solutions.

Processing and treating wastewater and effluents is a complex industry that deals with massive volumes (a large city like New York can demand the processing of up to 5 billion litres of water every day), is strictly controlled by multiple safety, health and environmental laws and regulations, and is characterized by complex logistical chains – all this in a sector where the slightest anomaly can quickly become an environmental or public health disaster.

The increasing volume of sludge produced by water treatment in highly populated areas is a major concern for local authorities and operators. Processing sludge to reduce volume and transform it into recoverable products has become a necessity.

In France, there is a “return to soil” policy regarding the use of sludge that is produced by municipal and industrial water treatment – 70% of sludge produced in France is already used in agriculture as an alternative to synthetic or mined fertilizers.

Devoteam developed the SludgeAdvanced solution to optimize efficiency in the management of the complex value chain that involves the production, processing, distribution, stockage and use of sludge-based fertilizers.

The Solution

The SludgeAdvanced solution is used by municipalities and industrial companies. Users include municipality staff, farmers, wastewater treatment plant operators, laboratories, and delivery drivers. The solution streamlines the process of turning wastewater sludge into agricultural fertilizer, thereby turning a waste product into a valuable resource.

It is an end-to-end solution that provides support to the management of the processes involved in recovering, treating, selling, transporting, and spreading finished fertilizer and sludge-based compost products.

SludgeAdvanced enables the digitalization of traceability processes, optimization of managerial procedures, and improvement of transparency and trust for all stakeholders. The strict traceability compliance requirements imposed by French circular economy regulations are enforced through the use of blockchain technology.

The solution also supports the complex stock management process of sludge by products, as there are specific protocols that regulate how and when these sludges can be used by farmers.

The SludgeAdvanced Solution developed by Devoteam is a recipient of the OutSystems Innovation Award 2022 for Environmental Impact, encouraging farmers to use fewer chemicals reduces resource depletion, costs, pollution, energy consumption, and CO2 emissions. In France alone, using sludge-based agricultural fertilizer avoids the production of 35,000 tons of synthetic nitrogen per year and the mining of 30.000 tons of phosphorus.

SludgeAdvanced encourages the transition to a greener, more sustainable, and more circular economy by making the sludge recovery process easy and transparent for all stakeholders.

Supporting Plastic Odyssey with Devoteam Foundation

Plastic Odyssey is a non-profit organization that aims to address the issue of plastic waste being dumped into the ocean. They are conducting a three-year global expedition aboard a laboratory vessel to combat plastic pollution. This is achieved by developing and sharing low-tech, open-source recycling solutions with communities and local recycling industries in affected coastal regions. As Plastic Odyssey’s network of local communities grew, they found it increasingly time-consuming to maintain relationships and communication. They sought an AI solution to streamline information access and exchange, with the goal of boosting and maximizing their impact.

During 2024, Devoteam Foundation France conducted an evaluation of how such an AI solution could be implemented. This evaluation considered user needs and profiles, available data, technical frameworks and limitations (such as the near-exclusive use of mobile devices), and internal resources. The evaluation provided Plastic Odyssey with a plan for an AI solution with the aim that Devoteam Foundation France will develop it to go live.

2.3.4 [E5-3] [E5-5] Targets and Metrics related to source use and circular economy and circular economy GRI 306-3, 306-4, 306-5

	Target	2024	2023
Total Waste Including recycled		32,421 kg 18,3526 kg	65,868 kg 15,515 kg
Non-Hazardous waste		28,683 kg	64,679 kg
WEEE (hazardous waste) Including recycled	- Reduce WEEE - Increase recycled rate	3,720kg 2,929kg (79%)	1,189 kg 1,020 kg (86%)
Reuse, donations and refurbishing		1,499kg	883.05kg

In 2024, we had a large operation of reducing our IT devices stock in France, resulting in an augmentation of the WEEE which does not represent the current trend.

In 2025 we are introducing a new target: we want 90% of Tech devices (computers, phones, tablets, screens, TVs, video conferences devices, network equipment, printers) reused, donated, or recycled by 2030.

3. Social Information

3.1 [ESRS S1] Own workforce

[S1-SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model

Our people are at the heart of Devoteam. We're dedicated to their growth, both professionally and personally, fostering an inclusive culture where everyone feels valued. This means providing career opportunities for all, regardless of background, and prioritising well-being. We believe that our strength lies in the talent of our people. We are committed to creating a learning environment - a Learning Company-where everyone feels valued, respected and empowered to reach their full potential.

The material topics covered in this ESRS include three main topics:

- Employee Conditions, Health, Safety, Well being and Human Rights
- Equal treatment and opportunities for all
- Training and skills development, especially for consultants

Regarding our business model and the profile of Devoteam employees (mainly skilled consultants) the topics adequate wages, adequate housing, and secure employment are considered not material. We will however report on some of these topics because we have addressed them for some years and they are material for some stakeholders. In the following section, we assume all employees (consultants and structure) are concerned, except if precise.

			Value chain location			Time horizon		
			Upstream	Own operations	Short term	Short term	Medium term	Long term
Employee Conditions, Health, Safety and Wellbeing. Human rights.	Developing ESG policies and improving HR practices The opportunity of engaging regularly with employees (satisfaction surveys, subsequent follow-ups), leading to the development of ESG policies and the improvement of HR policies matching employees' expectations, resulting in employee satisfaction and reduced attrition	Opportunity		x			x	
Equal treatment and opportunities for all	Skill-based hiring: unlocking innovation and diversity The opportunity of selecting new workers based on skills rather than experience or education, leading to a broader pool of potential talent and increased workforce diversity, resulting in a more innovative, adaptable, and successful company.	Opportunity		x		x		
	Promoting a diverse, inclusive, and supportive workplace culture The opportunity of fostering a diverse, inclusive, and supportive workplace culture, leading to increased employee engagement and collaboration, resulting in more innovations, productivity, and ability to recruit more talents	Opportunity		x			x	
	Programmes promoting employment of disabled people The impact of running for years a programme to keep disabled people employed, leading to adapting their working conditions, resulting in their employability.	Positive impact		x		x		
Training and skills development	Investing in employee skills training and development The impact of providing professional development opportunities and skills training to employees, leading to increased career development opportunities and, higher employee satisfaction and well being	Positive Impact		x	x		x	
	Skills gaps on ability to meet evolving client needs The risk of a mismatch between the skills and expertise of Devoteam's workforce and the evolving needs of the market, particularly in the areas of AI and sustainability, leading to inability to meet client demands resulting in falling behind competitors, loss of business opportunities and a decline in market share.	Risk		x	x		x	
	Fostering internal skills development The opportunity of fostering internal and multidisciplinary skills through dedicated training and employee skills development programs in all positions and departments, leading to a highly competent and adaptable workforce, resulting in adapting Devoteam's offerings quickly to new market developments (AI, sustainability...), increased business growth, employee engagement and retention, enhanced ability to meet evolving client needs, and a strengthened competitive position.	Opportunity		x	x		x	

3.1.1 Our People strategy

Devoteam firmly believes in a positive human future in a technology-driven world. Only fulfilled and happy tech talents will be able to create a positive future. This is our duty to offer all employees opportunities of personal engagement and great career opportunities. And we must keep this direction along the employee journey, from recruitment process, onboarding, career development and training, to offboarding. We empower our talents to become digital leaders through a comprehensive Employee Value Proposition. Rooted in our core values of respect, frankness, ambition, entrepreneurship, and collaboration, and driven by a strong commitment to CSR, we offer five key benefits: a positive work environment, supportive leadership, meaningful projects, valuable networking opportunities, and accelerated career growth. Learn more on [our career website](#).

Our people strategy is built on three main engagements:

- 1. A commitment to meritocracy, ensuring that we attract and retain the best talent, fostering a culture of excellence and innovation.
- 2. Multidisciplinarity, bringing a diversity of thought and expertise which is essential to problem-solving, innovation and our competitiveness.
- 3. The coexistence of several cultures within the firm which is a vector of human growth for the organisation and each of our talents.



3.1.2 [S1-2] Processes for engaging with own workers and workers’ representatives about impacts

GRI 2-26

Employee feedback is highly valued at our organisation. We foster an environment where employees feel empowered to share their perspectives and insights openly with colleagues and leadership. Through established channels, including surveys, events, worker representatives and regular management check-ins, we collect and analyse this feedback. This process directly informs our decision-making and guides actions taken to mitigate both current and potential impacts on our workforce.

Devomood, our engagement survey

Our top management is highly involved in our annual Group employee engagement survey, Devomood. Led by Group HR, it helps us pinpoint areas for improvement and check how well our actions are working. With at least 75% of devoteamers

responding every year, it gives HR leaders and top management valuable insights, including from groups that might be more vulnerable. These insights are both quantitative - with the possibility to focus on specific groups of people - and qualitative as we also collect comments within the employee feedback. This helps us build a more inclusive and positive workplace and shapes what we do in the future. The survey is anonymous, but employees can voluntarily give their name, and if they have scored any question less than 7, they are personally contacted by their HR contact. See metrics related to Devomood survey

Workers representatives

Our Workers’ Representatives are a key link between employees and management. They talk directly with each other in regular meetings. How often they meet depends on local agreements and is managed by local HR. Workers’ Representatives role includes giving advice, being consulted, and even endorsing decisions. This flexibility means they can contribute in a way that works best for each country. This ensures that employees’ views are included when decisions are made. They are an essential link to get insights from all employees, especially the people most vulnerable to impacts.

Attrition rate monitoring

Another way of engaging with the workforce and being vigilant, is following up our attrition rate, and making decisions at local and group levels to reduce it.

Attrition rate is tracked monthly, with both business and HR managers.

In order to reduce attrition that our sector and more generally all companies are facing, Devoteam has defined action plans on three areas:

- People follow-up to help Devoteamers stay connected with their manager, set clear goals, track progress, and share thoughts.
- Clear Career trajectory to help Devoteam plan their next steps

- Clear expectations regarding career progression, based on targeted consulting skills and tech certifications by rank to support growth and impact development.

Exit interviews are deployed in all geographies through Workday, to better identify reasons for leaving and set up actions to improve employee satisfaction. In 2023, 96% of leavers (unmanaged attrition) ran an exit interview with their HRBP.

93% of them recommend Devoteam and 82% say they would be ready to come back working at Devoteam.

3.1.3 [S1-3] Process for remedying negative impacts for own workers to raise concerns

GRI 2-25, 2-26

Four main processes are available to employees experiencing any discrimination, harassment, or HR concern. They are communicated on the Intranet and regular reminders are done to the employees.

Management line	HR support	IT department's grievance process on Data Protection.	Whistleblower system
The first contact when an employee faces any concern is the manager, on the mission or hierarchical manager.	Each employee has a HR business partner, who is their primary contact for their career discussions but also for any HR concern.	For issues relating to privacy, a specific line is available to contact the Data protection team who will immediately investigate and make necessary remediation decisions.	Our whistleblower system, operated externally, allows employees to raise concerns directly and confidentially. It is accessible via our “portal app”, the intranet and website. And managed by the Ethics alert committee. Read more about our whistleblower system in G1-1

Social Dialogue
GRI 2-30

The companies in each country follow the legal provisions for employment law and social dialogue is led in accordance with local regulations and legislation.

To take the example of the headquarters in France, 100% of employees are covered by a collective bargaining agreement, and by company-level agreements which ensure that they are represented by elected representatives.

Staff representatives are present in 100% of French entities that meet the legal requirements, and lead regular discussions with the company's management.

Topics discussed include working conditions, employment status and the company's economy. Negotiations are also held with the headquarters' trade unions on a range of topics such as employee benefits, quality of life at work and professional equality.

[S1-17] Incidents, complaints and severe human rights impacts

In 2024 Devoteams didn't receive any alert regarding human rights impact through the Whistleblowing alert system or any other means.

Economic and Social Committees (comité social d'entreprise - CSE)

France example

Devoteam France is compliant with the professional elections. 9 subsidiaries have their own social and economic committee elected by employees, as well as points of contact to report and follow up cases of sexual harassment and sexist acts.

Between 2022 and 2023, Devoteam France negotiated new agreements with social partners:

- one about communications resources for employee representatives
- the renewal of the agreement to promote and facilitate employment for disabled people.
- donating days off for sick children and caregivers

In 2024, Devoteam headquarters signed agreements on professional elections and also opened negotiations on disability. The latter negotiations did not result in a collective agreement, but the company frequently organises committees with the trade unions on this theme.

Regarding working conditions, Devoteam SAS has a company-wide agreement on the application of telecommuting. This agreement is duplicated in 100% of the Group's entities by

means of a teleworking charter drawn up in each entity. As a result, **100% of Devoteam employees have been covered by a teleworking policy since 2019.**

Devoteam France's social committee has set up a partnership with Ekie. It is an employee benefit service that enables employees to ask legal questions of a professional or personal nature, and obtain answers from partner lawyers.

100% of the total workforce at all sites is covered by the collective bargaining agreement of the Syntec Federation, which groups together several unions, including Numéum, the professional union for digital companies in France. The agreement applies to all entities that are members of the Syntec Federation, which is the case for Devoteam, which is a member of Numéum.

This agreement covers subjects such as :

- union rights and employee representation
- terms and conditions of employment
- termination of employment contracts
- vacations
- working conditions and working hours
- remuneration: the agreement defines minimum wages for the industry.
- sickness, accidents, parenthood,
- vocational training...

3.1.4 Working conditions

To empower employees to achieve success and ensure that they can thrive, Devoteam prioritises their health and well-being, driving initiatives and providing services to support physical, mental, and social health. Improving HR practices was defined as a material opportunity especially on work life balance, health and safety results in more satisfaction and reduced attrition.

Work life balance and health and safety [S1-1] [S1-4] [S1-5] [S1-14] [S1-15]

[S1-1] Policies related to work life balance and health and safety

With our **Group Human rights policy** (applying to all our employees and approved by our CEO), and our Health and Safety policy, we promote a positive and non-discriminatory work environment and encourage employees to contribute to continuous improvement.

Devoteam's risk prevention strategy is based on management leadership, stakeholder precaution, and immediate risk neutralization. The company is committed to preventing accidents through providing necessary tools and conducting prevention and awareness campaigns with all stakeholders, in line with local legislation.

Devoteam prioritizes the mental and physical health of its employees, believing that well-being in the workplace reduces accidents. The company focuses on creating a healthy and flexible work environment that supports work-life balance.

Devoteam's commitment to implementing and evolving its commitments requires ongoing involvement from all stakeholders.

The Global Health and Safety policy is completed with local policies to align with local contexts and regulations.

[S1-4] Actions related to work life balance and health and safety, approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

To empower employees to achieve success and ensure that they can thrive, Devoteam prioritises their health and well-being, driving initiatives and providing services to support physical, mental, and social health.

1. Occupational health and safety
GRI 403-1, 403-2, 403-3, 403-4, 403-5 403-6, 403-7, 403-8

Local regulations and standards regarding working and rest time are followed wherever applicable. Our employees are covered by local occupational health and safety management systems. Regarding our activity, we need to pay specific attention to the following occupational health and safety risks that we have identified :

- Safety at work ;
- Musculo-skeletal disorders
- Psychosocial risks (harassment, stress prevention) ;
- Psychological health (depression).
- Our process consists of several actions to mitigate such impacts.

Activity report: the entities monitor working rules and especially rest time thanks to the activity report.

Safety committees and officers: Committees and/ or safety officers for wellbeing, safety/health, stress & burnout prevention strategy are in place in most of the countries to define Health and Safety policies

and actions. They are also in charge of Employee health and safety risk assessment for their locality. For instance, 100% of Devoteam France is covered by the DUER (Document Unique d’Evaluation des Risques) risk assessment. Safety officers and committees are included in the Talent & Learning teams.

Psychological support: in some countries, a psychological support platform is also provided, enabling devoteamers to have regular follow-up sessions with a psychologist if they need it. For example Devoteam France partners with Simundia to support employee wellbeing and prevent psycho-social risks. This platform connects employees with qualified psychologists for confidential video consultations within 48 hours, covering both personal and professional matters. Devoteam funds the first six sessions. Simundia also provides online resources with advice on topics like stress reduction, emotional management, and communication. To complete this offer, a hypnotherapist also comes to the Levallois sites two Tuesdays per month for free sessions. Devoteam France also has a dedicated social worker. They can contact her directly for any problem relating to their professional or personal life (debt, family problems, etc.).

Ergonomic workstations and other preventions for musculo-skeletal disorders: Devoteam entities are in charge locally of performing workplace risk assessment (physical, ergonomic, physical, and work with video display terminals) and health checks. They provide ergonomic chairs, adjustable wide screens, adjustable desks height supporting a better body posture when seated., ergonomic mouses... Some countries also lead prevention programmes: webinars about health & ergonomics, intranet pages with information on movement & ergonomics, best practices for working from home, 20-20-20 rule... Belgium is also planning an OptiDesk survey for every employee in 2025, an online tool by IDEWE

that helps evaluate and improve workstations, assessing factors like ergonomics, work habits, and environment to provide personalized advice and identify potential health problems.

At Devoteam France, an osteopath comes free of charge 2 Thursdays a month for 45-minute sessions dedicated to relieving musculoskeletal pain, improving posture and enhancing mobility.

Awareness and Training: Training is provided locally on a regular basis to ensure the safety of the premises (fire checks) and the safety of people in the event of a fire. Depending on the size and number of employees in the buildings, “first-aid at work” training is also provided.

The psychological health issue is a specific focus for training. In France, for example, an e-learning course is available to help Devoteamers prevent and deal with psychosocial risk situations in their day-to-day work, and a training course provided to all managers by an external organization also includes a specific module on this topic. At Devoteam France, 53 employees have taken the legally required training courses (fire, health and safety at work, etc.).

Alos, 36 managers were trained in the prevention of psychosocial risks by an external organization

ISO 45001: Devoteam entities are progressively aligning with ISO 45001 guidelines on Health and Safety Management System.

Devoteam Germany has been certified since 2024 (10% of operational sites of Devoteam).

Devoteam France and several countries are compliant with the ISO 45001 guidelines, especially as they already are ISO 14001 and ISO 9001 certified, 100% of operational sites of Devoteam France are covered by this occupational health and safety risk assessment. They also introduced measures to protect the health of their employees: a procedure

to protect isolated workers, the supply of protective equipment for employees concerned, the appointment of anti-harassment advisors, employee training in psycho-social risks, etc. In view of these policies and measures, as well as the fact that Devoteam’s management processes correspond to the framework expected by ISO 45001, Devoteam France is currently considering the possibility of initiating a certification process.

2. Wellbeing

Devoteam’s wellbeing and supportive programmes are defined and run locally, in accordance with local context, laws and regulations. They coordinate actions for employees, both in their professional and personal lives, to increase employee happiness, cohesion and solidarity.

Remote working

Since 2020 marked by the covid crisis and the resulting new working conditions and employee expectations, Devoteam has encouraged remote working.

The terms and conditions are defined at the local level, following exchanges with social partners and managers.

On this side the Group improved its infrastructure to make it easier for all the employees to telework: providing professional equipment in some countries, and equipping meeting rooms with video conferencing and jamboards.

To avoid remote working that comes with bad impacts on the work-life balance of Devoteamers, the Group acknowledges and supports the right to disconnect for all employees, providing the employees with guiding rules. The Group favours hybrid working to benefit from both the flexibility of remote working (2 days per week) and the emulation and conviviality of the office. Global guidelines were

defined at the end of 2024 and are locally deployed and adapted if the context requires it.

Promoting a healthy lifestyle

Devoteam is dedicated to fostering a healthy lifestyle across its entities, alongside promoting sustainability. Sport practice is encouraged in all geographies, especially through internal clubs, and alternative commuting options are promoted. We also organize regular challenges to raise momentum on this topic which is both important for our employees health and wellbeing and aligned with our environmental commitments.

Here are some examples of recent initiatives:

- **Bike Challenges:** For the second year, Czech Republic and Slovakia teams participated in the “Bike to Work” challenge, promoting physical activity and reducing their carbon footprint. 20 participants across 5 teams collectively travelled 2108 km, saving 337.3 kg of CO2 emissions. During Earth Week 2024, Denmark incentivized cycling with a Bike Challenge to encourage a healthy, eco-friendly commute.
- **Step Challenges:** During sustainability month, Austria, Serbia organized a Step-Challenge, promoting employee well-being and physical activity. UK extended it to an exercise challenge, to see how far employees could travel without emitting carbon (running, paddle boarding, swimming, running...participants took 1,200,060 steps, which equates to 914.45 kilometers in 9086 minutes (151.43 Hours)
- **Participation in charity runs.** For example in Serbia in May 2024, one third of our employees participated in a 5-km run challenge with tree planting founded by Devoteam Serbia.

- **Gymlib partnership :** Devoteam France has been a Gymlib partner for several years, offering access to various gyms at preferential prices.

Happiness@Devoteam

Happiness@Devoteam is a program built for and by Devoteamers in the French entities. It proposes and promotes numerous clubs, communities and initiatives to offer better employee experience and increase their engagement.

It consists of 28 clubs (sport, music, gaming, photography, environmental initiatives...), happiness teams in each entity, and 100+ events per year. The Happiness@Devoteam program has set up affinity groups dedicated to parenthood and disability. An opportunity for employees to discuss their daily lives in a safe and accessible environment.

Donating paid leave

Since 2018, Devoteam France staff have the opportunity to support colleagues with paid leave donations. If an employee needs time to care for an ill child, caregiver with loss of autonomy, or a dependent/disabled parent, he/she can request for days’ donation. When it concerns a child, Devoteam France grants to the employee half of the total days requested; the second part is completed with

volunteer employees offering their own days off. The system is applicable to all entities in France. In 2024, 30 days were donated (half by employees, half by Devoteam) to help one family.

[S1-14] Metrics related to health and safety

GRI 403-9, 403-10

Work-related accidents & Disease

Number of work-related accidents	0
Rate of recordable work-related accidents	0%
number of fatalities as a result of work-related injuries and work-related ill health	0
Occupational disease	1 employee 366 days

Data collected through local HR managers. All Devoteamers included.

Absenteeism rate

Countries	Absenteeism 2024	Absenteeism 2023	Absenteeism 2022
France	3.73%	3.33%	3.91%
Norway	4.90%	3%	3%
Sweden Creative Tech	3.86%	2.6%	2.7%
Sweden G Cloud	1.6%		
Sweden N Platform	1%	NA (2024 acquisition)	
Belgium	3.41% (2)	2.75%	2.9%
Netherlands	3.7%	2.8%	3.57%
UK	5.83%	Non reported (1)	1.2%
Luxembourg	2.45%	1.4%	1.4%
Austria	3.52%	2.64%	3.56%
Czech Republic	2.9%	1%	2.3%
Slovakia	2.6%		
Germany	3.77%	4.32%	4.97%
Spain	1.43%	1.24%	2.43%
Portugal	1.64% (3)	2.84%	2.05%
Morocco	7%	1%	Non reported
Indonesia	1%	1.4%	Non reported
Italy	0.8%	1%	0.52%
Lithuania	0.74%	1%	Non reported
Poland	1.2%	0.1%	Non reported
Serbia	2.2%	2%	4%
Turkey	2%	Non reported	Non reported

Non reported: Denmark, Middle East, Tunisia. (1) non reported in 2023 due to system changes (2) excluding G Cloud entity (3) excluding Cyber Trust entity

[S1-5] [S1-15] Targets and metrics related to work-life balance metrics

Responses to Devomood internal engagement survey

	target	2024	2023
Response rate	75%	76.5%	74.4%
eNPS	>30	29	32
Rating on work-life balance	8.5/10	8.1/10	8.2/10

Family-related leave

All employees are entitled to family-related leave.

3.1.4.1 Adequate wages and social dialogue [S1-1] [S1-4] [S1-5] [S1-8] [S1-10] [S1-11]

GRI 2-19, 2-20

Regarding our business model and the profile of Devoteam employees (mainly engineers) and the regulated European market where Devoteam evolves, with laws on social dialogue, the topics of adequate wages and social dialogue were not identified as material. However, such topics are considered as basics to a business so we will voluntarily report.

[S1-1] Policies related to adequate wages and social dialogue

Devoteam respects and promotes national laws and international labour conventions, as a signatory of the UN Global Compact.

Devoteam’s Human Rights policy covers the subjects related to adequate wages and social dialogue. We believe respect for the dignity, rights and ambitions of all people is a cornerstone of business excellence.

Every worker has a right to compensation for a regular work week that is sufficient to meet the worker’s basic needs and provide some discretionary income. We are committed to offering 100% of our people and suppliers worldwide, a minimum living wage, in accordance with the local laws, regulations and standard of living.

The company supports collective bargaining, freedom of association and the right to collective bargaining. The company ensures that employee representations are respected in accordance with local regulations and legislation.

Through our Anti slavery statement included in the Group Human rights policy we commit to fighting against forced or compulsory labour and child labour.

[S1-4] Actions related to adequate wages and social dialogue, approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

Living wage and legal wage

Eagle For Value, the Group operating model, defines Devoteam priorities and offers a clear vision of career development, certification, and salary grids in all the Group geographies. This model ensures a virtuous circle where more impactful consultants drive better prices and margins, and guarantees at the same time a fair treatment for all, as the salaries inequality in the same rank are limited by the salary grid.

In order to guarantee the adoption of Eagle for Value

and equity in all our geographies, frequent Eagle for Value trainings are delivered to HR's, sales and managerial teams.

We have a “HR Whitebook” presenting all Eagle for Value concepts (jobs, ranks, tiers, profile, salary grid structure) as well as common Workday definitions. This Group HR Whitebook is a reference for the Devoteam HR community in all subsidiaries. It aims to share some standards and guidelines for global core HR processing and monitoring everywhere in the Group.

Salary data is closely monitored in Workday and controlled by HR teams and top management.

Social Dialogue

The companies in each country comply with the legal provisions relating to employment law and social dialogue is led in accordance with local regulations and legislation. Cf ESRS S1-3

[S1-5] [S1-10] Targets and metrics related to adequate wages, advancing positive impacts, and managing material risks and opportunities

	target	2024	2023	2022
Living wage (scope of analysis: 100% of our direct employees)	0% people with permanent contract paid below living wage	0%	0%	Not reported

[S1-8] Metrics related to social bargaining

Collective bargaining	2024
Total percentage employees covered by collective bargaining agreements	66.3% *

*aligned with local legislation. For example, we count 100% in Austria, France (all entities combined, including Devoteam SAS), Belgium, Luxembourg, Morocco, Norway or Spain.

[S1-11] Metrics related to social protection

Devoteam provides comprehensive income protection to its employees in case of significant life changes. This coverage extends to periods of absence due to illness, occupational injury, parental leave, and retirement. The specific terms and conditions of this protection are detailed within employee handbooks and contractual agreements.

3.1.5 Equal treatment and opportunities for all

Devoteam commits to offer Equal treatment to all its employees, during the entire employee journey.

The recruitment process is transparent, and open to all profiles including people with disabilities. Fair treatment is managed through our recruitment management tool, SmartRecruiter, allowing the process to be traced in a complete, transparent and harmonised manner, while protecting candidates' personal data.

Our “ONEBoarding” programme integrates newcomers, providing resources on Devoteam’s values, strategy, and processes.

Devoteam supports employee growth through structured career paths, accessible job descriptions,

and personalised development plans created with HR and managers. We’ve boosted career support, improved visibility of opportunities, internal mobility guidelines, and added features for expressing career interests in our HR tool, Workday. Initiatives like Career Weeks also promote mobility. Annual performance and career reviews, with regular check-ins, are standard.

Upskilling is a key focus as Devoteam evolves in a tech high speed evolving environment. All Devoteamers receive opportunities to get trained both on technical matters and soft skills.

Eagle For Value, our operating model, clarifies career development, certifications, and salaries. It ensures fair treatment through a transparent salary grid.

Read more about Eagle for Value

Workday, our global HR system, supports 100% of Devoteam. Recent enhancements provide better onboarding, check-ins, goal setting, and performance/career reviews.

Our management process plans regular discussions between an employee and his manager: annual reviews, half year review, and regular check-ins which are the opportunity to raise any concern. Such sessions are monitored in workday to ensure improvement along the way, even in case of management change

The onboarding journey, career path, training and all related documents, including welcome guide and digital learnings, are available on the intranet.

3.1.5.1 Training and skills development [S1-13] [S1-4] [S1-5]

GRI 404-2

[S1-1] Policies related to training and skills development

Devoteam is evolving in a market where required skills are changing fast. This is even more true with the development of Artificial Intelligence (AI). To keep the pace, we have committed for years to continuous learning and development, investing in our people through a learning framework and global focus on training. This equips consultants with the skills and certifications needed to excel, drive impact, and deliver innovative solutions for clients.

Devoteam’s learning initiatives are focused on three key goals, ensuring alignment and maximum impact for Devoteam:

- Being a **premium consulting company** by utilizing innovation and expertise with a focus on “tech for people”
- Being a **learning company** with a culture of continuous growth and evolution
- **Preparing for the future** by embracing change and investing in partnerships with technology leaders and employee development.

From 2024, we have committed to train all our employees to AI and GenAI with an upskilling & reskilling program containing various levels depending on the employees current capabilities. For example, the level 1 foundations learning program includes general modules, and personalised job-based sessions.

[S1-4] Actions related to training and skills development, approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

At Devoteam, we invest in our employees’ development through a comprehensive learning ecosystem. We established a robust learning infrastructure, including a learning community, platform, datasets, dashboards, and processes, all governed by the Talent & Learning Global Steering committee, with updates provided quarterly to the Executive Committee. All employees are covered by our training approach with a specific focus on consultants.

We use a blended approach to training, incorporating several methods to support certification attainment and skills development. These include:

- tailored programs from strategic partners like Microsoft, Google, AWS, and ServiceNow: we maintain a comprehensive catalogue of 1000+ approved certification referentials, which are reviewed annually by subject matter experts from our various entities to ensure relevance and market value. In 2024 we introduced the ability to tag AI Certifications allowing us to track these specifically based on market and customer demands.
- internal boot camps and academies run by Devoteam experts;
- a wide range of eLearning courses via platforms like Udemy for Business;
- and both virtual and in-person trainer-led sessions, including those at our EMEA Learners Campus in Luxembourg.

We also foster community-driven learning initiatives throughout the year. In December 2024, we replaced our former French training management system (My Devoteam Academy, Veriselect and Qualiopi certified) by Workday Learning, which offer employees a single and comprehensive platform to request all training (both on site and online), get their manager approval and perform the online sessions. It will be progressively deployed in the other geographies. After the French pilot, all other countries are expected by mid-2026.

Online training: Udemy for all

Our partnership with Udemy began in 2022 and provides access to thousands of online courses, hands-on labs and assessments covering technical and soft skills, aligned with career paths. Since May 2024, 100% of devoteamers have access to the platform where we offer both mandatory courses / learning paths and access to other learning including partner certifications.

Udemy is connected with Workday, our HR tool, so certifications and training completion pieces of evidence are automatically uploaded in the employee profiles, allowing complete monitoring. In addition, managers can now link this to performance management in both check-ins and end of year reviews.

Technology Partner

As top tier partners with the major platform companies (ServiceNow, Microsoft, Google, AWS, Snowflake, Databricks, Atlassian, Nvidia, Outsystems), Devoteam employees have access to the partner learning ecosystems to complement the platforms and learning provided by the company. The main focus is on Partner Certifications although the learning is more comprehensive and broader than

just this to meet the needs of the learner.

Onsite training

Our EMEA Learners Campus in Luxembourg delivers training across the EMEA region and focuses on developing local trainers into EMEA-level instructors. This initiative provides free and discounted courses to Devoteamers, encouraging knowledge sharing.

In addition to the above, each country has their own learning budget where they can invest in onsite training based on their needs. For example this could be Career Managers training as seen in France where all career managers undertake a comprehensive 9 month program that blends both eLearning and on-site training to fulfil their learning requirements.

Group-wide training focuses

In order for Devoteam to keep up with the pace of change relating to AI and other strategic technologies the company has changed its approach with a view to provide common learning across all countries and ensure that learning is available to all employees in a timely manner. For strategic topics, Devoteam corporate takes responsibility for the design, build and deployment of learning programs with strict KPIs for countries and Corporate to achieve. The learning programs that fall under this category include:

- Sustainability - Level 1 (All employees)
- GenAI Level 1 (All employees)
- AI Level 2 - Developing AI Practitioners
- AI Level 3 - Upskilling and reskilling into AI jobs

GenAI Level 1 - 100% Devoteamers trained on AI

In July 2024, the GenAI Level 1 learning program was launched on the Udemy platform - it consisted of 6 modules where the first 5 were mandatory

(Ethics, Prompting, Devoteam GenAI Charter, AI conversations and Gemini) and the 6th you could select from a choice of 6 learning paths which were personalised for different job roles (2 based on Business, 4 based on tech topics). In total 5 hours of learning is required to complete and be awarded the “GenAI Level 1” badge.

AI Level 2 - 100% of Devoteamers linked to an AI Level 2 job role

Launched in January 2025, the AI Level 2 learning program is job role specific and aims to develop AI skills in a specific area of interest - it is expected that the learner will be an AI Practitioner upon completing the course whereby they demonstrate both AI skills to enhance their everyday tasks for increased productivity and quality, as well as the ability to build AI capabilities for enhanced value. The learning integrates Partner Certifications where applicable. In total approximately 20 hours of learning is required to complete and be awarded the “AI Level 2” badge.

AI Level 3 - Target to be defined in 2025

Aimed at employees who are either 100% building AI capabilities or employees with close proximity roles looking to reskill into an AI job. This comprehensive program is AI job role specific and aims at developing all the skills relating needed to operate as an AI expert.

Sustainability training - 100% Devoteamers

We provide a Sustainable IT certification programme to address the climate emergency and promote ethical digital practices. This programme, using partner MOOCs and platforms, educates Devoteamers on sustainable work practices and integrating sustainability into client projects. Read more about the programme.

To raise sustainability awareness among employees, Sustainability Learning Hub is available on the Intranet. On top of Mandatory modules - Sustainable IT, Fighting corruption, Combating unfair competition, Conflict of interest and Data protection - Devoteamers can find in this Learning Hub additional resources on the four dimensions of our sustainability strategy. Some courses are specific to Devoteam, and employees can also access our stakeholders' learning material. For example, we encourage Devoteamers to use the UN Global Compact Academy if they want to train about carbon accounting, human rights or diversity. Some countries are also offering deeper job-based training. For example Devoteam France launched a 14 hours training program (level 1 : 8 hours ; level 2 : 6 hours) in 2024. 47% of Devoteam France's designers are trained in responsible and inclusive digital practices through level 1, and 15% through level 2. The program focused on understanding disability, improving accessibility, and acquiring best practices for designing and developing web content in accordance with the RGAA framework. The training covered various technical and design criteria and included understanding different types of disabilities, mastering accessible design practices, and recognizing and proposing solutions for errors. The pilot program was launched in early 2024.

Accelerating Knowledge sharing

In 2024, Devoteam launched a Knowledge Management initiative to enhance knowledge sharing and accessibility throughout the organization, aiming to improve collaboration and efficiency through the reuse of existing assets for the employees benefits. A key element of this initiative was the release of the KM tool, designed to improve document and people searching, as well as content curation. The importance of data collection and quality has increased with the rise of AI and GenAI, as these

technologies need clean, relevant, and precise content to generate valuable insights. Content classification and management are essential to ensure content relevancy before it is processed by AI engines. This prevents wasted energy on outdated or irrelevant content. Devoteam initiated a group-wide campaign towards users to have their consent to clean its Google Drives, resulting in the deletion of thousands drives and the archiving of many others, freeing up space and reducing unnecessary data processing. Thousands of documents were also affected by this initiative and encouraged to launch regular campaigns like this to better govern the documents lifecycle. Devoteam has improved document governance by implementing a confidentiality labeling system. This system allows users to assign one of four labels — CO-Public, C1-Internal, C2-Confidential, or C3-Secret — to each document with a single click. Each label has specific rules and restrictions that control how the document can be shared and manipulated. Devoteam's ultimate goal is to transition from Knowledge Management to content science, where information is mapped and managed intelligently within our storage drives.

[S1-5] Targets related to managing training and skills development, advancing positive impacts, and managing material risks and opportunities

Target 2025	2024	2023
Certifications 70%consultants certified	68.5%	54%
# AI Certifications 1300	365	NA
GenAI Level 1 100% employees trained	72%	NA
AI Level 2 50% Consultants trained	NA	NA
Sustainability 70% employees trained	32%	10%

[S1-13] Metrics related to managing training and skills development, advancing positive impacts, and managing material risks and opportunities

GRI 404-1, 404-3

	2024	2023	2022
% of employees that participated in performance and career development reviews	74%	Non reported	Non reported
average training hours per employee	43.68	32.5	45.1
Number of employees trained to upskill (% in total workforce)	8833 (86.8%)	5,545 (54.0%)	5,066 (49.4%)

Training hours are defined as time spent on training and skills development (on-site training, online courses, workshops, certification programs, educational opportunities...) Consultants declare

such hours in their activity report and upload their certifications in Workday, allowing the monitoring. Udemy also embeds a reporting tool providing the number of days and minutes of activity for each account. In 2024, we offered a Udemy licence to all Devoteamers, explaining the increase of the number of consultants trained.

3.1.5.2 Diversity, Equality and Inclusion [S1-1] [S1-4] [S1-5] [S1-9] [S1-12] [S1-16]

[S1-1] Policies related to diversity, gender equality and equal pay for work of equal value, and inclusion

The Devoteam Group works for equal opportunities, merit-based promotion of its collaborators and does not tolerate any form of discrimination against its Employees, customers or any person having a relationship with the Devoteam Group, based on criteria such as race, skin colour, beliefs, religion, nationality, ethnic origin, age, gender identity, sexual orientation, civil status, disability (all our positions are open to disabled people) or political opinion.

We believe that diversity contributes to the creativity, dynamism, and excellence of our organisation.

Group actions have three main ambitions:

- Increase diversity in the IT market and the number of talents choosing tech careers
- Increase the number of talents from all horizons within Devoteam
- Ensure equal treatment for all Devoteamers

Our commitments regarding diversity and inclusion are detailed in the Group **Human Rights policy**.

[SI-4] Actions related to diversity, gender equality and equal pay for work of equal value, and inclusion, approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

Recruitment process

We are looking for candidates who demonstrate solid tech and business foundations, as well as “consulting readiness” (fit with Devoteam culture and values, soft skills, motivation for consulting, tech and working at Devoteam, tech saviness & business skills) and also project themselves with a long term relationship mindset (drive, leadership & Impact, ability to build assets).

Devoteam Group is committed to equal opportunities, promoting its employees on the basis of merit and actively fighting against all forms of discrimination. We believe that diversity contributes to the creativity, dynamism and excellence of the Group. All the positions are open to people with disabilities.

To ensure fair and efficient recruitment, Devoteam adopted a recruitment management tool, SmartRecruiter, allowing the process to be traced in a complete, transparent and harmonised manner, while protecting candidates’ personal data.

Our commitment to diversity is demonstrated through: clear, transparent job advertisements; participation in disability-focused recruitment events like Hello Handicap; hiring employees from diverse ethnic backgrounds; and avoiding disaggregation by age, sex, orientation, or nationality during hiring.

A Reference hiring process in Devoteam, nurtured by a unified scorecard

- Profile Screening
- Talent Acquisition Interview
- Testing (where applicable)
- Tech / Business Interview
- Leadership Interview (where applicable)
- In specific occasions : Customer / Sales Interview (where applicable)
- 2 interviews minimum, including at least 1 in-person

We also engage in initiatives to increase diversity in the tech industry. Here are a sample of local initiatives

- **Promoting Tech career & training possibilities to wider population**
Devoteam Luxembourg has established partnerships with Lycée Guillaume Kroll and CESI school, delivering sessions on AI, CyberSecurity, Open Source technologies and Microsoft solutions to students. These initiatives not only provide valuable tech exposure to wider groups but also offer Devoteam employees the opportunity to enhance their public speaking skills and promote the company’s values and culture within the educational sphere, ultimately contributing to a more diverse and inclusive tech workforce. In addition, Devoteam actively participated in mock interview sessions and job fairs organised by both institutions, with the dual objective of promoting

career opportunities within the company and preparing students for their transition into the professional world.

- **Support & reskill unemployed population with “France Travail”**
In France, Devoteam has partnered with France Travail, the national employment agency, to provide a professional retraining programme aimed at supporting and reskilling the unemployed. This nine-week training initiative, co-financed by Devoteam and France Travail, offers jobseekers from key regions like Paris, Lyon, Toulouse, and Nantes the opportunity to transition into IT roles. With a 90% hiring rate upon completion, the programme successfully integrates individuals from diverse professional backgrounds into Devoteam’s IT solutions deployment business. This initiative targets both technical roles, such as application development, and functional positions that bridge the gap between clients’ business and IT departments, enhancing the practical use of digital tools. Since 2021, this programme has facilitated the hiring of approximately ten individuals annually, contributing to a more diverse and skilled workforce.
- **Mentorship for young talent**
Devoteam Middle East is committed to shaping the next generation of technology leaders by offering exclusive internship opportunities to university students on the verge of graduation. Through these internships, aspiring professionals gain first hand exposure to real-world projects, cutting-edge digital solutions, and industry best practices. More than just an internship, this initiative serves as a gateway for young talent to explore their potential, develop critical skills, and transition seamlessly into the workforce.

As part of its mission to nurture future leaders, Devoteam has trained 52 graduates, identifying high-potential students and introducing them to the company’s dynamic ecosystem. By immersing interns in a culture of innovation, collaboration, and mentorship, Devoteam empowers them to thrive in the fast-evolving technology sector. This initiative reflects Devoteam Middle East’s unwavering commitment to investing in young talent and driving sustainable career growth in the region.

Gender diversity

Devoteam actively champions gender diversity and inclusion through a range of targeted initiatives.

Policy Enforcement:

We ensure our policies, including those related to equal opportunities and non-discrimination, are rigorously applied across all levels of the organisation. HR are particularly involved in such actions and we have clear reporting mechanisms in place to address any violations and ensure accountability.

Employee Education:

We conduct comprehensive training programmes to educate employees on the importance of gender diversity and inclusion. These programmes cover topics such as unconscious bias, inclusive communication, and best practices for creating a respectful workplace. We use a variety of methods, including workshops, e-learning modules, and interactive discussions, to engage employees and promote understanding. For example, Devoteam France has trained 11% of its workforce to diversity and inclusion. Women’s day and Women in Tech days are also celebrated.

Community Engagement:

We actively participate in Women in Tech communities and initiatives to support the advancement of women in the technology sector.

This includes providing mentorship opportunities, sponsoring events or initiatives, and sharing our expertise and resources. For example, Devoteam Belgium integrated the UN Campaign #heforshe. The Belgium MD and 150 Devoteamers signed in 2021 the commitment to this campaign encouraging men and people of all genders to stand in solidarity with women to create a bold, visible and united force for gender equality.

This also includes creating and facilitating Women in Tech internal communities in our different geographies like in France, Belgium, Portugal or Netherlands, featuring workshops designed to enhance expertise and networking.

Talent Pipeline Development:

We invest in initiatives that encourage girls and young women to pursue careers in technology. This includes partnering with schools and universities to provide educational programmes, workshops, and internships. We also work to raise awareness of the diverse career opportunities available in the tech industry, challenging stereotypes and promoting role models.

Actions towards people with Disabilities

Devoteam is committed to promoting employment for people with disabilities through a range of proactive measures. Our comprehensive disability policy encompasses four key commitments: recruitment, training and awareness, collaboration with adapted companies, and maintaining employment.

We organise events to raise awareness and foster understanding, such as those held during the

Facilitate Disability at work

France

Devoteam has been committed to a policy in favour of diversity and the employment of disabled workers since 2007, and in 2021 we signed a fourth group agreement containing 18 commitments in favour of the professional integration of disabled people.

Since January 1, 2024, we have withdrawn from the approved agreements and launched our new disability policy with 4 commitments.

A disability service, the “Handicap mission” has been in activity since 2012 with the aim of steering and implementing the various thrusts of our disability policy, aligned with the approved agreement. It is represented by a dedicated, full-time referent for these diversity and inclusion activities.

The current policy covers 4 main areas:

- 1. Integrating and developing employment for disabled employees through recruitment.
- 2. Maintaining disabled Devoteamers in employment. Devoteam set up a range of initiatives to adapt working conditions: ergonomic workstations, specific equipment linked to the employee’s pathology, medical absences granted by Devoteam, raising awareness among recruiters and HRBP...
- 3. Raising awareness and training employees through communication and learning initiatives. Devoteam offers training modules for employees with disabilities, and for all employees to promote inclusion. All recruiters, HR employees and managers receive compulsory training in disability and diversity management through face-to-

face and e-learning courses.

The Handicap Mission is also raising awareness on disability issues among all our teams through in-house workshops and events (EDEW - European Disability Employment Week). 2024 edition of EDEW gathered 204 Devoteamers around 5 different activities:

- Presentation of the disability policy with employee testimonials;
 - “Cap emploi” presentation: “Cap emploi” (employment centers) are specialized placement organizations with a public service mission. They are responsible for the preparation, support, long-term monitoring, and retention of people with disabilities in employment;
 - Interview with Thomas Bouvais, French table tennis athlete, disabled sport;
 - Intervention by the T’hompouss firm, specialized in disability, to present how to be recognized as a disabled worker;
 - Level Up: an awareness quiz on 4 themes : invisible disabilities, disability and innovation, and caregivers
4. Developing internal policy in favour of partnerships with Disabled Friendly Companies (DFC). Devoteam is working with DFC on a range of activities, including employment, catering, administration, green spaces, etc. Main partners are listed below. Lastly, the Devoteam Group is committed to offering employees inter-contractual skills sponsorship for DFC requiring IT services.

We are also launching an internal process with the business to boost the provision of intellectual services with the DFCs.

European Week for the Employment of People with Disabilities, and conferences addressing the balance between disability and performance.

We also utilise responsible purchasing strategies, partnering with adapted enterprises to indirectly support employment for people with disabilities, and support initiatives to increase the access to jobs for people with disabilities. For example, like every year, Devoteam Spain has received in 2024 students from Areteia School in its offices in Madrid, with the aim of motivating and inspiring these students, but also to show them the endless opportunities that await them in their professional future. Areteia School is a centre specialised in students with learning difficulties. During these open door sessions, around 30 students had the unique opportunity to learn about the dynamics of a company committed to promoting diversity such as Devoteam.

Cultural diversity

Devoteam embraces cultural diversity, fostering a rich tapestry of perspectives and experiences. Our commitment to diversity is evident in our hiring practices, which actively seek individuals from various ethnic backgrounds, contributing to a workforce representing over 120 nationalities.

Furthermore, we extend our expertise to support organisations in this field like Devoteam Germany did with VolontEurope, providing pro bono services to migrate their data to Google, demonstrating our dedication to leveraging our skills for the benefit of diverse communities.

Supporting nonprofits acting for Diversity and Inclusion

To actively promote Diversity and Inclusion in the society, Devoteam Foundation proactively supports several nonprofit organisations working in this field. **#TechforPeople Labs** are sessions Devotealm Foundation has regularly organised for years. They are mini-hackathons to collaboratively tackle a technological challenge that they have to address in order to improve (cf Devoteam Foundation part). The 2024 spring session of Labs was dedicated to supporting 5 non-profit organizations working on inclusion.

- Xenia:** OneLab resulted in a continued collaboration where Devoteam UK supported the organization Xenia to develop an app within Xenia’s Google Cloud PPlat. Xenia is a not-for-profit organisation that offers support and a safe space to non-English speaking women to meet women who speak English to practice the language and integrate into society. The application that Devoteam UK helped them build enables the organisation to capture details of who has attended each session. This information is then fed into the reports they can generate from the application to support their grant applications. The application has been designed so it can be scaled up as Xenia expands.
- Soroptimist:** The lab with the association Soroptimist Portugal and continued in a design project for their web. Soroptimist is an international association aiming to improve the lives of women and girls.
- RightsTechWomen:** The association had a Lab with Devoteam Germany, were also financially supported through Devoteam Foundation’s Call For projects, helping them continue advancing the human rights of women and girls in STEM.

- CoderDojo:** This non-profit association organizes free coding sessions for girls and boys aged 7 to 18, where they learn programming and develop their creativity in technology. They had a challenge to the lack of oversight and standardization in volunteer-contributed materials that lead to misplaced, duplicated, or outdated content, poor visuals, non-editable formats, missing translations, mixed branding, and limited search functionality. In Autumn 2024, Devoteam Belgium conducted a #TechForPeople Lab in collaboration with CoderDojo to explore solutions to these challenges, providing the association with valuable insights and possible approaches. Additionally, CoderDojo received financial support through Devoteam Foundation’s Call for Projects, empowering them to continue their work to encourage young people to gain experiences and technical skills that they can use in the future.

Prevent discrimination and Harassment

Across the group, a clear stance against discrimination and harassment is taken. Key actions include:

- Strong Policies:**
A firm code of conduct is in place, with clear guidelines and sanctions, often integrated into employee handbooks and legal documents signed during onboarding. Local Health and Safety policies incorporate violence and harassment prevention.
- Culture of Respect:**
Efforts are made to foster a respectful and inclusive work environment through employee feedback and communication with managers.
- Prompt Action:**
HR teams handle inquiries quickly and provide care to affected employees.

- Support Systems:**
Trusted persons (confidants), harassment referents, staff representatives, Social Affairs in some countries, and access to psychologists and social workers provide support and guidance.
- Training:**
Mandatory training on violence and harassment prevention is conducted to raise awareness. Some countries, like France, also implemented mandatory training specifically for recruiters, HR and managers in good ethical and non-discriminatory practices on disability, provided by an HR consulting firm.
- Reporting Mechanisms:**
Ethics alert line ensures confidential reporting for employees raising concerns, even anonymously.
- Monitoring and Enforcement:**
Ethics committee monitor alerts and ensure actions are taken, including potential intervention by authorities.

[S1-5] Targets related to diversity, gender equality and equal pay for work of equal value, and inclusion, advancing positive impacts, and managing material risks and opportunities

Targets	2024	2023	2022
Follow each year the percentage of women in our teams	27.7% of women 24.7% of women in directors	27.8% of women 21.9% of women in directors	28% of women 23% of women in directors
Improve our Gender Pay Gap (1) - Adjusted per rank	10%	Not reported (different calculation)	Not measured
In France: Improve equality index (2)	French equality index: 85/100 as an average 7/9 entities with a score superior or equal to 75/100	French equality index: 85/100 as an average 9/11 entities with a score superior or equal to 75/100	French equality index: 83/100 as an average 7/9 entities with a score superior or equal to 75/100

1. Calculation: average salary of men - average salary of women (per level/rank) / average salary of men
2. In France, through the calculation of the "gender equality" index, a tool to measure the progress of gender equality, the Social Affairs Department monitors the development of each French entity and supports them in the implementation of improvement actions. More information is available on the French Devoteam Website.

[S1-9] Metrics related to diversity

Gender distribution in management and top management
GRI 405-1

	2024	2023
Board of directors		
Total number of members	8	8
The underrepresented gender (female) in %	12.50%	12.50%
Executive committee		
Total number of members	30	26
The underrepresented gender (female) in %	13.30%	11.50%
One Tribe (Directors)		
Total number of members	401	329
The underrepresented gender (female) in %	24.70%	21.97%

Data consolidation changed between 2022 and 2023.

Age distribution

	Total 31.12.2024 (2)	Total 31.12.2023 (2)	Total 31.12.2022 (1)
Workforce	10,171	10,331	10,262
<30	30.33%	33.1%	34.5%
30-50	59.60%	57.5%	56%
> 50	10.07%	9.2%	9.5%

1. Measured on 9310 employees, in entities using Workday, our HR tool, in 2022.
2. Measured on all employees (all Devoteam entities are using Workday since 2023)

[S1-12] Metrics related to persons with disabilities

indicator	Disabled employees in 2024	Disabled employees in 2023	Disabled employees in 2022
Belgium	0.48%	0.46%	0.51%
France (1)	1.68%	1.23%	1.18%
Germany	3.38%	3.56%	2.53%
Italy	4.69%	1.79%	2.56%
Lithuania	4.00%	3.90%	Non reported
Middle East	0.23%	0.51%	2%
Portugal	0.64%	0.50%	Non reported
Spain	1.29%	1.10%	2%

1. Scope : Devoteam France, excluding BeTeam

Due to local legal restrictions we are not able to report metrics related to people with disabilities in all our geographies. In consequence we cannot provide any Group consolidation.

[S1-16] Metrics related to compensation (pay gap and total compensation)
GRI 405-2

Gender Pay Gap

	2024
Gender Gap - unadjusted	14%
Gender gap - adjusted per rank	10%
Gender gap billable - unadjusted	10%
Gender gap per rank billable - adjusted per rank	5%

[S1-17] Incidents, complaints and severe human rights impacts
GRI 406-1

	2024
# Work related incidents of discrimination	0
# of complaints filed through channel to raise concern	0

3.1.6 Metrics related to workforce [S1-6]
[S1-7]

[S1-6] Characteristics of the undertaking’s employees
GRI 2-7

Employee distribution in Headcount

	Total 31.12.2024 (2)	Total 31.12.2023 (2)	Total 31.12.2022 (1)
Workforce	10,171	10,331	10,262
Female	27.70%	27.7%	28%
Male	72.26%	72.3%	72%
Other / Non reported	0.04%		

1. Measured on 9310 employees, in entities using Workday, our HR tool, in 2022.
2. Measured on all employees (all Devoteam entities are using Workday since 2023)

Employee distribution by country in Headcount

	Female	Male	Other / non reported	Total
AUSTRIA	3	39		42
BELGIUM	59	356		415
CZECH REPUBLIC	44	75		119
DENMARK	107	221		328
FRANCE	1,254	2,855		4,109
GERMANY	85	270		355
INDONESIA	15	27		42
ITALY	16	48		64
JORDAN	37	34		71
LITHUANIA	15	60		75
LUXEMBOURG	31	113		144
MOROCCO	97	101		198
NETHERLANDS	67	323		390
NORWAY	50	71		121
POLAND	5	18		23
PORTUGAL	386	1,019		1,405
SAUDI ARABIA	103	457		560
SERBIA	59	72		131
SLOVAKIA	6	16		22
SPAIN	243	843		1,086
SWEDEN	55	141		196
TUNISIA	56	91		147
TURKEY	1	20	1	22
UK	21	65	3	89
UNITED EMIRATES	2	15		17
Total headcounts	2,817	7,350	4	10,171

Data per country for the last 3 years is in the appendix.

Employment characteristics

Female	Male	Other / Not reported	Total
Number of employees (Headcount)			
2,817	7,350	4	10,171
Number of permanent employees (Headcounts)			
2,742	7,199	4	9,945
Number of temporary employees inc. apprentice (Headcounts)			
75	151	0	226
Non-guaranteed hours employees (Headcounts)			
0	0	0	0
Number of full-time employees (Headcounts)			
2,697	7,194	4	9,895
umber of part-time employees (Headcounts)			
120	156		276

Attrition

GRI 401-1

Female	31.12.2024	31.12.2023	31.12.2022
Unmanaged attrition rate (12 months)	16.60%	19.4%	22.3%
Total departure	2,866	3,453	3,203
Total hires	2,693	3,488	4,188

[SI-7] Characteristics of non-employee workers in the undertaking’s own workforce

GRI 2-8

Number of non-employees (FTE)	2024	2023
Subcontractors	2,470	2,186

Subcontractors are classified as non-employees. They are individuals whose labour contributes to Devoteam, delivering services on behalf of Devoteam, but do not hold an employment contract with us. The total number of subcontractors is estimated through different methods regarding the countries (direct FTE monitoring, extrapolation from the number of days invoiced or budget).



3.2 Consumers and end-users [ESRS S4]

[S4-SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model

Our work affects many people: we handle the data of end-users who can be our client’s employees using our solution for work, people using our client’s products or services, like citizens using a final product and our own employees. They rely on our solutions and could be affected by issues with data protection and discrimination.

The way we keep data protected and secure is vital for us as an IT company. We therefore work closely with our clients to understand the needs of these users and spot any risks.

		Value chain location			Time horizon		
		Upstream	Own operations	Short term	Short term	Medium term	Long term
Personal and confidential business data exposure: The impact of failing to protect personal data and confidential business data leading to loss/alteration/dissemination, resulting in negative effects for the data subject, such as identity theft, financial losses, and violation of privacy rights.	Potential Negative impact	x	x	x	x		
Risk of data breach The risk of unauthorized access to Devoteam systems or data leak leading to data loss and/or use by third parties, resulting in legal damage, fees and loss of contracts	Risk	x	x	x	x		

[S4-1] Policies related to consumers and end-users: Data Privacy

A specific governance is in place in order to address and respect both Devoteam clients´ & employees’ personal data:

- The Data Protection Officer (DPO) appointed at the French authority in charge of Data protection (CNIL) who is systematically involved, upstream, in all Group projects to coordinate GDPR topics and securing related issues.
- The Group also has a Data Privacy Leader, assisting the DPO in all projects and his primary mission ensuring the Devoteam Group’s compliance: in its internal operations and in its relationships with clients, with personal data protection laws and regulations, and in particular Regulation EU 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR) .
- Local GDPR referents (GDPR Local Advisors) named in each entity, to guarantee their obligations towards both local & European Data protection laws.

The Devoteam Group’s security corpus relating to information security and personal data protection include a General Data Protection Policy, and a document retention schedule, that the Group DPO, Data Privacy Leader and GDPR Local Advisors are enforcing within the Group.

[S4-2] Processes for engaging with consumers and end-users about Data privacy

If a data leak happens, we act fast to stop it and follow set procedures and immediately tell our clients. They then inform everyone involved. We might also need to contact local authorities and individuals affected, depending on the situation. When resolving GDPR issues for the end use, they can contact our clients (the data controllers) to use their GDPR rights. We’ll then follow any valid requests from the client.

More details about stakeholders interests and engagement is described in **SMB 2**.

[S4-3] Processes to remediate negative impacts and channels for consumers and end-users to raise concerns : Data privacy

GRI 2-25

Contracting with compliant suppliers

Before contracting with any supplier using security or personal data, we lead a 360° assessment including data protection processes. We enforce demanding data protection thresholds and requirements to our supply chain.

Data Leaks

If personal data leaks, we stop the activity causing the leak and block access to the affected data. We then find the cause, delete the exposed data and apply the appropriate remediation measures.

After any of these issues

We learn from what happened and improve our methods, procedures, and training to prevent future occurrences.

How to Raise Concerns

Users can raise concerns about big problems through

- The exercise of rights is centralised on the DPO’s email inbox (dpo.group@devoteam.com). This address is the privileged point of contact with the local stakeholders in charge of data protection.
- The **whistleblowing alert system**, available on our **website**
- The general contact information on Devoteam website

Our Code of Conduct and Whistleblower Policy guarantee no retaliation for raising concerns.

[S4-4 except DP 35] Taking action on material impacts and approaches to managing Data Privacy material risks, pursuing material opportunities and effectiveness of those actions

Role of the DPO team

In this capacity, the Devoteam Group DPO team performs the following duties:

- Developing, updating, and ensuring compliance with the Privacy by Design procedure;
- Ensuring the proper implementation of the data breach management and reporting procedure to the competent supervisory authorities, as labeled by the CNIL;
- Managing and monitoring requests from data subjects regarding their personal data rights;
- Collaborating with the CISO team to ensure adequate protection of personal data to be processed within the Devoteam Group's activities;
- Collaborating with the Devoteam Group's legal department to contractually frame the protection of processed personal data;
- Developing and delivering training and awareness programs on personal data protection for Devoteam Group personnel;
- Ensuring compliance with the accountability principle by documenting the internal mechanisms and procedures that demonstrate compliance with personal data protection rules; and
- Maintaining an up-to-date record of personal data processing activities conducted by the Devoteam Group.

People awareness and training

In order to effectively protect personal data, Devoteam Group employees are made aware of information security and personal data protection through several channels :

- E-learning training courses developed in-house, including Data protection (mandatory), Good security practices for remote working (mandatory), Phishing awareness, Identity fraud, etc. ;
- Phishing simulation campaigns via the Sophos - Phish Threat tool performed several times a year;
- Global and local Communication campaigns on the company social network or by e-mail in case of specific needs.
- Specific training provided by the CISO and DPO teams for functions that are critical in terms of the information handled (human resources, sales, etc.).

The good security practices communicated to employees are regularly updated to incorporate new :

- New threats identified ;
- New legal and regulatory obligations;
- Client requirements.

Finally, at our client's request, we also have the capacity to ensure the follow-up of specific security training (provided by the client) to our consultants before they start their mission.

	Risk / impact description	Mitigation actions
Negative impact	The impact of failing to protect personal data and confidential business data leading to loss/ alteration/ dissemination, resulting in negative effects for the data subject, such as identity theft, financial losses, and violation of privacy rights.	Implementation of a state-of-the-art identity and access management including: • A single directory (Active Directory synchronised with Google directory), with personal accounts for all users. • The use of Google SSO, which performs the vast majority of authentications on Devoteam's assets. • Synchronisation between the directory, the roles assigned and a single HRIS database, used by the entire Devoteam Group's HR department. • Google MFA enabled by default for all collaborators • State-of-the-art password policy. Account provisioning is automated according to the type of role/user profile, applying the principle of least privilege. • Data Protection impact analysis performed by the DPO's team.
Risk	The risk of unauthorized access to Devoteam systems or data leak leading to data loss and/or use by third parties, resulting in legal damage, fees and loss of contracts	Implementation of a state-of-the-art identity and access management including a document classification system in Google Workspace (continuous implementation of data loss prevention rules), enabling confidentiality levels to be assigned (from C0 "public data" to C3 "secret data") and actions to be restricted according to these levels.

2024 projects

In 2024, a continuous work on the processing registers was performed.

- Devoteam implemented a tool that provides a processing register of all Devoteam activities at Group level on personal data (staff management, payroll management, etc.).

This tool allows Devoteam to increase data protection and fulfil its legal obligations (eg: GDPR...)
- Each Department/Business Unit/Country listed the data processing operations, to update the compliance procedures and related documentation. These activities were also an opportunity to remind each department about the Data protection rules & best practices, for instance: minimization principle, data duration, least privilege principle, etc.).

Emphasis has also been placed on carrying out Data Protection Impact Assessments (DPIA) on a number of our tools and processes in order to analyze and reduce the risks that may weigh on people's rights and freedoms when we implement processing activities. These analyses are based on the expertise of the Privacy team, in the presence of all stakeholders involved in the processing activity.

Awareness and training sessions were organised to train teams about personal data and data protection, with the main targeted group in 2024 being Sales teams.

In 2024, Devoteam also continued to perform an in-depth data protection process update.

In 2022 & 2023 , we focused on the Management Process and the exercise of the people's rights. In 2024, this work has been extended in particular in the compliance of our different internal tools.

We are actively collaborating with the local security teams (Group CISO & Local CISO and its team) as well as the legal department to secure internal projects processing personal data, throughout

their life cycle (from conception, through design and contractualisation until implementation & run phase, so like the end of the project) in a Privacy-by-Design approach.

In terms of Devoteam being involved and engaged in third-party relationships (for example, subcontractors), we have applied our contractual data protection standards to all service providers involved in the internal project.

Client Case - Devoteam Foundation

Une Voix Pour Elle

The association Une Voix Pour Elles provides crucial support to women escaping domestic violence by offering safe relocation, free storage, and assistance in settling into new homes. Their initiatives ON BOUGE! help women regain independence, ensuring security, anonymity, and a fresh start. The association needed to enhance their operations, particularly regarding emergency moves and the sensitive personal information of domestic violence victims.

In 2024, the Devoteam Foundation, within the framework of the Cyber For Good program, Une Voix Pour Elles in their implementation of a CRM system with the key focus to improve data protection and establish a robust security strategy. This improved CRM system enhances beneficiary monitoring, resource planning, and overall efficiency. This enables the organization to better support women escaping domestic violence, ensuring their security, anonymity, and a fresh start.

3.2.1.1 [S4-5] Metrics related to Data privacy

GRI 418-1

KPIs	2024	2023
Personal Data Processing	200	150
Internal Project compliance	~ 280	~ 200
Impact Analysis preparation	~ 20	~ 20
Personal right requests	180	120

3.3 Impact of IT - Entity-Specific Topic

		Value chain location			Time horizon		
		Upstream	Own operations	Short term	Short term	Medium term	Long term
Tech to solve SDG-linked challenges (tech for sustainability): The impact of Devoteam offering tech solutions, especially AI, to better measure and solve SDG-linked challenges, leading to our clients and non-profits progress to better human living conditions and faster global positive progress toward sustainability.	Positive impact		x	x		x	

3.3.1 Our sustainability offers

1.1.1 [MDR-P] Policies

Sustainability is far more than a buzzword for companies. In a context with multiple environmental and social crises, tech solutions must be implemented with a clear vision of their impact. Finding the right balance between tech and sustainability is a key for tangible value. We do it for our own sustainability pathway, but we know that our major impact is to support the sustainable digital transformation of our thousands of clients.

As Tech Natives, we combine cutting-edge innovations and our multi-tech expertise to address the most urgent challenges of today in a sustainable manner. Through this approach, we bring Tech for People.

Our objective is to use the right tech to deliver impactful projects for our clients, helping answer some of the challenges of our era: climate emergency, biodiversity collapse, social inequalities.

With our sustainability offers, we help our clients leveraging tech to accelerate their sustainability journey. Additionally to these offers dedicated to sustainability, we also embed sustainability in all our deliveries, through energy efficiency, hardware efficiency, and carbon awareness. This is even more necessary with the development of AI technologies: we are convinced of the benefits that AI can bring to tackle sustainability challenges, and acknowledge at the same time the challenges they represent for ethics, people and the environment. This is why we are committed to participating in increasing knowledge about AI impact, for example partnering with the Shift project to better understand and measure AI pressure on the environment.

1.1.2 [MDR-A] Actions

1.1.2.1 IT for Sustainability and Sustainable IT

In 2024 we have strengthened our sustainability offers with a global governance including a central agency and local representatives in all our geographies, and adapted our portfolio to the fast-evolving sustainability stakes our clients are facing with three paths:

- 1. **Sustainability Solutions for ESG:** Enabling data for ESG for our customers, from carbon reporting to CSRD data point automation and compliance
- 2. **Sustainability solutions for Business:** Providing tech solutions for businesses to increase their positive impact on Sustainable Development Goals (SDGs) and reduce pressure on planetary boundaries
- 3. **Sustainability solutions for IT:** Enabling sustainable IT for our customers, from carbon accounting to eco-design operational model.



Client Case:

Organization A Takes Flight: Reducing Environmental Impact and Fuel Costs with Devoteam's AI-Powered Solution

Organization A Analytics department wanted to reduce the impact of airline travels. This objective implied being able to analyze flight data to optimize fuel consumption, writing up and deploying the best flight practices, creating models to estimate the added value of such best practices. Data was at the heart .Devoteam helped Organization A boost its fuel-saving program with a custom SaaS solution. This platform lets airlines analyse and visualise flight data. We built machine learning models to predict fuel use. These models consider different piloting styles during various flight phases.

We also created evaluation reports so airlines can track their performance against best practices and get recommendations for improvement.The project encouraged "eco-piloting" and pilot participation in fuel saving. Our work included preparing data, building Python machine learning models, and creating PowerBI dashboards to show the results. We also provided extra studies tailored to the client's needs, such as optimising take-off and analysing engine start/stop procedures.With better insights, airlines companies were able to reduce their fuel consumption, resulting in reducing both their environmental impact and spending. Such practices also have a positive impact on engine health and aircraft maintenance.

Client Case:

Lighthouse Illuminates Hotel Insights with Generative AI

Lighthouse, a global leader in cloud-based hospitality business intelligence, present in 185 countries, with 60,000 clients, has been providing user-friendly revenue management tools since 2012. They have won many industry awards and were named the UK's 17th fastest-growing private technology company.

Lighthouse collects data from different sources, including online travel agencies (OTAs), hotel websites, and booking engines. They use the data to track hotel performance, identify trends, and make strategic decisions, they provide to their customers.

Recently, Lighthouse became interested in using Generative AI to summarise data from hotels. This allows them to give hoteliers a quick overview of what is happening in their business. Revenue Managers wrote those reports manually, taking them a fair amount of time to analyse past data, understand previous trends, predict possible future trends and provide meaningful insights for decision-making.

The proof of concept utilised Generative AI to expedite the reporting process for Revenue Managers by providing quick insights on past hotel performance data.

The solution involved splitting the problem into four sub-problems, each with a specific focus: generating insights based on events, market segments, future trends, and past performance. Prompt engineering was used for simpler tasks, while more complex data analysis required few-shot prompting and fine-tuning to improve accuracy and mimic the writing style of Revenue Managers.

The application code generates the summary and sends it back to the backend. Feedback from Revenue Managers was crucial in refining the prompt engineering techniques.

The main goal of the Proof of Concept was to help Lighthouse learn how to use Generative AI technologies and move forward with this use case in production.

Client Case:

Devoteam's Data and AI: Powering the Levallois Metropolitans' Pro B Push

About Levallois Metropolitans Basketball Club

After a historic 2023-2024 season marked by the Blue Steelers' French NM2 championship title, the Levallois Metropolitans Basketball Club, aiming for the Playoffs and a move to Pro B in the 2024-2025 French NM1 championship season, is leveraging Devoteam's Data and AI platform to meet its growth, performance, and visibility challenges.

The challenge

Recognizing that high-performance athletes thrive on data-driven insights, Devoteam has developed technology that provides precise metrics, helps establish concrete objectives, and defines actionable steps for improvement. Initial tests of Devoteam's application have already revealed previously unknown performance factors through cross-referencing various data sets, demonstrating tangible added value to the club and its players.

The solution: A data platform serving sports performance

Devoteam's data platform serves as a crucial decision-making tool for the team, aggregating historical data to provide valuable analytical depth. This platform transforms raw data into a coherent and actionable narrative, enhancing understanding beyond simple figures. Key to this solution is data visualization, which clarifies complex information, personalizes the approach for staff and players, and provides engaging content for fans, while also pinpointing areas for improvement.

Furthermore, Devoteam integrates generative artificial intelligence to optimize athlete peak performance and identify tactical patterns, strengths, and weaknesses. The platform delivers precise recommendations on roster rotations, playing styles, and match management, including tactical adjustments to exploit opponent weaknesses. Notably, Devoteam's technology innovatively evaluates players' defensive impact with precise metrics, addressing a traditionally challenging aspect of basketball analysis.



1.1.2.2 Raising awareness on Sustainable IT among our ecosystem

Devoteam is committed to promoting IT positive impacts to leverage them and increasing knowledge about the negative impacts to reduce them. Today, there is a challenge that digital energy consumption is growing faster than forecasted, leading to an increase in induced greenhouse gas (GHG) emissions and therefore a need to reflect on practices and actions that limit the direct and indirect environmental impacts of digital technology while maximizing its positive effects on ecological transition. This is particularly a risk with AI development as running large language models inherent to the GenAI process does require significant computing power today. Energy consumption from AI is a challenge the entire industry is facing. We don't have all the answers yet, but we're committed to finding sustainable solutions.

Contributing to understanding tech impact

Since April 2024, we have partnered with the non profit **Shift Project** to understand the transition to a post-carbon economy and help our market navigate this shift by assessing risks and impacts. The Shift Project is a French European non-profit think tank advocating for a shift to a post-carbon economy committed to serving the general interest through scientific objectivity, dedicated to informing and influencing decision makers and public institutions in the debate on energy transition in Europe by formulating and presenting the links between the economy and energy and innovative proposals based on scientific fact. The current analysis, where some Devoteamers are involved, focuses specifically on the impact of AI, and aims to reflect on practices and actions that limit the environmental impact of digital technology. The project will result in a report in autumn 2025, proposing operational methodological frameworks

for implementing digital sufficiency. These frameworks will be applicable in public strategies and policies, in companies, and in systems of use in the private domain with the aim to maximize the net effect of digital levers in terms of ecological transition.

Raising awareness about sustainable IT

To promote Sustainable Digital Transformation for our customers, our teams also organized a series of impactful events and knowledge-sharing initiatives. In 2024, we actively engaged with industry leaders and customers to foster awareness and practical solutions. This included attending a C2C event at Veolia with Google in March focusing on 'Go Green Software' and sustainable software choices. We also organized a unique server manufacturing visit at OVHcloud in Croix in June, providing customers with firsthand insight into eco-conscious infrastructure. Devoteam M Cloud also organized a sustainability event in partnership with Terra Reporting and R4S: "ESG Reporting y Transformacion Empresarial: innovacion para un futuro sostenible" ("ESG Reporting and Business Transformation: Innovation for a sustainable future".) which occurred in Barcelona in October. Furthermore, our presence at the Go Green event in March, and a dedicated sustainability event in Lille in June, with SNCF and Veolia, underscored our commitment. Devoteam also showcased its expertise at the Paris Greentech Forum on November 5th/6th and contributed as part of the jury at the GreenIO conference during APIdays on December 4th/5th, solidifying our role as a key player in the sustainable tech space. These events, coupled with our ongoing efforts in producing articles and white papers, demonstrate Devoteam's dedication to empowering clients to achieve their sustainability goals through digital innovation. All our sustainability insights are available on our website in a **dedicated page**.

"Open Greenhouse Lab"

In June 2024, Devoteam Germany hosted 17 students from a local school for the **"Open Greenhouse Lab"** in collaboration with their partner Red Hat. They aimed to inspire and educate the next generation about sustainability and technology and to provide students with practical learning experiences beyond traditional education. During the lab, students built a prototype greenhouse and a moisture sensor for plants. They also learned about teamwork and the diversity of roles within an IT company. This experience aimed to inspire and educate the students and at the same time provided them with a hands-on learning experience, exposing them to sustainability, technology, and the IT industry.

Devoteam at UNECE Forum: Advancing Gender Equality Through AI Education and Empowerment

In October 2024, Devoteam joined a UNECE forum to explore how AI can promote gender equality, particularly in digital literacy, and technology access. The goal of the workshop was to develop strategies to increase women and girls' representation in AI and technology fields, and to explore how AI tools can create inclusive educational and professional environments. It focused on using AI for positive change, showing how it can improve various sectors like healthcare and cybersecurity for women and girls. Devoteam experts shared insights on ethical AI development and practical applications of generative AI tools, emphasising the importance of quality training to close digital skill gaps and boost female representation in tech. They discussed building fair AI systems, highlighting the need for unbiased data, ethical input filtering, and careful output correction. The key message was that quality education & training, specially in AI is essential for equity and responsible innovation. The event reached over 300 participants, and was promoted through the UN Blue Book.

1.1.2.3 Our innovation programmes

Embedding sustainability in every Devoteam activities requires a strong focus on innovation, in line with the Group historic intrapreneurship spirit. Such innovation programs allow all employees to be part of the Group innovation journey.

TechRadar by Devoteam

In 2025, Devoteam released the fourth edition of its **TechRadar by Devoteam**, a go-to guide that provides a comprehensive overview of what's happening in the continuously changing technology landscape. The TechRadar by Devoteam is a simple tool to understand and choose the right technologies for an organisation's needs. TechRadar by Devoteam helps leaders stay informed, explore new possibilities, and make confident decisions as technology progresses. This year's edition brings the focus to (gen)AI, with a specific AI category and over 80 AI augmented technologies. Over 100 Devoteam experts, half of which being part of our Digital Champions community, selected and evaluated the top 150 emerging technologies that everyone should keep on their radar to thrive in the digital world. The technologies are divided into six categories, one being Managed Platforms & Sustainable IT.

Hackathons

In 2024, Devoteam again organised several hackathons. Led by geography or international entities, they aim to work collaboratively on tech projects. With this creative process Devoteamers are invited to propose innovative IT solutions, improve existing software or design new applications. For example:

- **N Platform Pillar Hackathon:** Held April 14th-16th, focused on ServiceNow technologies. 94 participants from 9 countries brainstormed and competed on "Energies for a Better Future" and

- “Fostering Diversity & Inclusion”.
- **A Cloud - Cloud Ops GameDay:** Took place on January 23rd in partnership with AWS. 12 participants from Portugal, Germany, and Belgium solved real-world scenarios using AWS Management & Governance Services.

Hackathons methodology is also used in our TechforPeople Labs, 3hours workshops to solve collectively the tech challenge of a non-profit organisation. Details are in the Foundation section.

Research and innovation programmes

Gravity is Devoteam France’s R&I program aiming at bridging scientific research and technological innovation, promoting a multidisciplinary approach, and tackling environmental, ethical, and societal challenges through AI.

We focus on three core pillars:

- Research (Scientific PoCs, publications, studies, conferences),
- Innovation: Development of MVP, new products/ services based on research or client needs.
- Advocacy: Partnerships, communication, ecosystems, and knowledge capitalization.

The key focus areas for Gravity are Frugal AI & Green IT, Right Techs (sustainable, repairable, non-obsolescent technologies), Sportech (Mental & physical health, performance, injury prevention), Digital twins, and Foresight and design fiction.

In 2024, our research department represents:

- 600 contributors
- 8 PhDs
- €4M in revenue
- 20,000 human days invested
- Numerous prototypes and scientific publications

1.1.3 Targets & Metrics [MDR-T] [MDR-M]

Targets	2024	2023	2022
Continue involving employees in innovation through hackathons with our strategic partners and Devoteam Foundation Tech for People Labs	106 people involved in Hackathons led with AWS and ServiceNow 20 labs gathering 242 participants in 11 countries for 20 NGOs	194 people involved in Hackathons led with Google Cloud and ServiceNow 12 labs gathering 189 participants in 10 countries for 18 nonprofits	200+ people involved in Hackathons led with our partners 9 labs gathering 171 participants in 7 countries for 15 nonprofits

3.3.2 Devoteam Foundation

GRI 2-29, 413-1

3.3.2.1 Policies [MDR-P]

The Devoteam Foundation brings Devoteam’s #TechforPeople vision to life. By using our tech expertise, we help non-profit organisations reach their operational excellence and maximise their social impact. We also encourage consultants to discover social innovation, accompany associations, non-profits, and non-governmental organisations, and inspire social entrepreneurs through different engagement formats. This is mainly done by three activities:

- Skills donations
- Money donation
- Advocacy: promoting tech for social impact

3.3.2.2 Actions [MDR-A]

Our activities in skills donation are based on two actions:

- Pro Bono work: missions to help non-profitable associations define their needs around tech and offer support to imply their technical transformation plans.

- #TechForPeople Labs: a 3-hour multidisciplinary workshop where a mix of Devoteam experts support an association with suggested solutions to solve a technical challenge or issue.

During 2024, Devoteam Foundation accelerated its international transformation: first pro bono missions started in Germany, Spain and the UK, and Devoteam Lithuania, Norway and Sweden conducted the first #TechForPeople Labs to support local non-profit organisations. These actions were made in collaboration with Devoteam’s local ambassadors to obtain a close relationship and good cultural understanding of the association’s working context. The 3-hour #TechForPeople Labs in the UK was also an example of how the result of one action can continue into a longer pro bono mission to help the association get the solution in place. To increase the impact of some missions and strengthen the relation, Devoteam Foundation made donations to support some specific pro bono work programmes or partners in France.

All devoteamers in all countries can apply to Devoteam Foundation’s annual Call for Projects. It started 2007 with the aim to found nonprofit organisations in which a devoteamer has a personal involvement. In 2024 the Call for Projects financially supported 36 associations in 9 countries. In October 2024, Spain was affected by the DANA floods which caused the Foundation to do an emergency together with Red Cross Spain to support the local population to build up their community again.

The Shift Project is a think tank organisation created in 2010 that aims to limit both climate change and the dependency of our economy on fossil fuels. During spring 2024, Devoteam Foundation and Devoteam France took part in their « Lean ICT » project that aims to reflect on practices and actions that limit the direct and indirect environmental impacts of Digital, especially AI, while maximizing the net effect. In France, Devoteam Foundation joined the Cyber For Good program developed by the associations

Share-it, Latitude and Advens to support non-profit organisations tackling their cyber security and data protection challenges. On a European level, the Foundation continued to support the organisation The Social Good Accelerator, SOGA that in 2024 organized a European conference on the value of Social Economy data and worked with the EU Commission, reinforcing ethical and responsible digital governance for Social Economy organizations.

The ambition for 2025 is to increase the AI focus of the Foundation, continuing to support associations willing to develop their own AI and also guide them how to use AI ethically and sustainably.

3.3.2.3 Targets & Metrics [MDR-T] [MDR-M]

Devoteam Foundation ambitions and contributions

Ambitions and contribution	2024	2023
Number of working days Devoteam Foundation engaged with non-profit organisations(1)	785	1,100
Appr 70% of supported non-profit organisations work on education and inclusion(2)	74%	40%
Appr 30% of supported non-profit organisations work on environment (3)	26%	13%
Number of engagements in a global or local activity	4,216	3,924
Number countries running DVT foundation programmes (Call for project, #TechFor People Lab, Probono)	13	10

1. The figure for 2024 includes associations supported in TechForPeople Labs and pro bono work.
2. The figure for 2024 includes associations supported in TechForPeople Labs and pro bono work in inclusion and education. The 2023 includes association supported only with pro bono in education.
3. The 2024 figure includes associations supported by TechForPeople Labs. The 2023 includes association supported only with pro bono work.

4. Governance Information

[G1-GOV-1] The role of the administrative, management and supervisory bodies

The role of the administrative, management and supervisory bodies is described in [\[GOV 1\]](#)

[G1-IRO-1] Description of the processes to identify and assess material impacts, risks and opportunities

Ethical business practices are fundamental to Devoteam’s success, as our work relies heavily on our employees and value chain. We prioritise complying with relevant laws and international ethical guidelines. This is crucial not just to avoid legal and financial penalties, but also to maintain a skilled and

effective workforce. Building a company culture that protects employees and stakeholders from potential human rights issues, prevents corruption, and safeguards whistleblowers is essential.

The legal & compliance team performed governance double materiality assessment, DPO (data protection officer) and CISO (Chief Information security officer), the purchase team and coordinated by the CSRD core team. It covers the entire Group.

Acting mainly in regulated markets, material IROs were focused on new trends. However, we improve our practices every year, and embedding ethical business practices is part of our sustainability policy so we will disclose general information about Governance and ethics.

		Value chain location			Time horizon		
		Upstream	Own operations	Short term	Short term	Medium term	Long term
Risk of bad ethical & security AI practices: The risk of AI development leading to larger volume of data exchange and more security / data protection / ethical risks resulting in bad deliveries, reputational damages, and or doubts about Devoteam’s ability to achieve its AI-driven strategic plan.	Risk	x	x	x		x	



4.1 Business conduct [ESRS G1]

4.1.1 Policies [G1-1] [G1-2]

4.1.1.1 [G1-1] Business conduct policies and corporate culture

GRI 2-23, 2-24, 2-27

Devoteam has established and shared several policies to promote a responsible business culture, strengthen its relationships and comply with regulations. Our Code of Conduct is central to this, outlining our commitment to legal compliance, ethical standards, and core values.

It is completed by several charters and processes applying to internal and external stakeholders. Especially the AI charter is key to prevent the risk of bad ethical and security AI practices (material IRO).

Code of conduct

The Code of Conduct defines the ethical rules, values and principles embedded in our operating practices. Since 2023 it also includes People and Environmental commitments.

The Devoteam Code of Conduct applies to all employees, Devoteam Group Managers sign it and are informed of any updates. They are responsible for the proper dissemination, comprehension and effective application of this Code by all Employees in all geographies.

AI Charter

Faced with the challenges of AI, Devoteam has chosen to frame usage in a charter and align the whole group. It completes the **IT Charter** which defines the conditions of use and access to the Group's information system.

In 2024, Devoteam released the second version of the

AI Charter. It outlines the company's commitment to ethical and responsible AI use. Our charter details the risks associated with Generative AI, including information leakage, code vulnerabilities, reputational risks. We included guidelines for Devoteamers on input, output, ethics, and reporting concerns.

We have also chosen to emphasise the importance of training, and how it will be an essential component of GenAI deployment at Devoteam.

By following these guidelines, Devoteam aims to leverage generative AI to improve efficiency and maintain its role as a trusted strategic advisor while upholding the highest security and compliance standards.

Group Compliance Programme

The Group compliance programme, coordinated by the legal department is responsible for the compliance activity, the compliance process and its ongoing improvement, especially with regard to the implementation of local laws. Devoteam is regulated by the Sapin II Law and subject to the duty of vigilance and in this context, is applying a large range of measures like the code of conduct, related parties declaration, risk map, delegated authority, in order to make operations more secure and to strengthen the internal control mechanisms.

Internal Representation Letter

With the Internal Representation Letter, entity managers formally commit to ensure that the financial statements and various activities comply with laws and regulations, as well as with the business and ethical directives of the Group.

Declaration of related-parties (GRI 2-15)

The declaration of related-party transactions (a transaction between the Group and a third party

related to a Group employee) is signed every year by the CEOs, COOs, CFOs and all senior managers, and provides a strong commitment to the prevention of conflicts of interest.

Request to transversal services (GRI 2-26):

An internal request form is available for all devoteamers seeking advice or any information about sustainability concerns. The CSR ambassadors are the local Single Point of Contact (SPOC) for any requests raised in their geographies. Local SPOC are in charge of knowledge management and continuous improvement

Whistleblowing Alert System (GRI 2-26, 418-1)

The Group applies all the laws and regulations in force locally in each country where it operates, and has set up an **Ethics Whistleblowing System** available to all internal and external stakeholders, accessible on Devoteam's website and intranet, in order to actively fight against corruption, anti-competitive practices, non-compliance, conflicts of interest, fraud, money laundering, data security, harassment, discrimination incident...

A specific policy defines the ethics alert process. The Ethics Alert Committee, composed of the Group Chief People Officer, Internal Audit Director, General Counsel, and CSR Director, considers and responds to each alert.

The Group protects whistleblowers, in particular against potential acts of retaliation or disciplinary sanctions, and ensures that their identity is kept strictly confidential, whether the person is an employee of the Group or a third party. Devoteam has chosen to outsource the management of this ethics alert system to an external service provider (Navex), to maximise its effectiveness and ensure complete confidentiality of the actions taken by the whistleblower. Their anonymity is guaranteed.

As no alert was recorded in 2024, the Ethics Alert committee aims to lead several actions to increase the visibility of the Ethics Alert System.

4.1.1.2 [G1-2] Management of relationship with suppliers

Sustainable purchase (GRI 308-1, 308-2, 414-1, 414-2)

Devoteam's procurement strategy prioritises sustainability. Purchases fall into two categories:

- productive purchases (25%): purchases of services enabling the Devoteam Group to carry out projects for clients;
- non-productive purchases (75%): purchases enabling the company to operate internally (for example: electricity consumption, IT software or event organisation).

Devoteam actively manages its value chain's social and environmental impact.

In 2024, more than 55 partners (in Austria, Belgium, Alps (Czech Republic, Slovakia), Denmark, France, Germany, Italy, Indonesia, Lithuania, Luxembourg, Middle East, Morocco, Netherlands, Norway, Poland, Portugal, Serbia, Spain, Sweden, Tunisia, United Kingdom) completed a **CSR questionnaire covering safety, ethics, human rights, and environmental impact**. 57% of them are classified "A or B" regarding Devoteam suppliers classification.

This helps us select partners based on service needs and track their progress, particularly their carbon footprint. Our **Supplier Code of Conduct** details Devoteam's expectations regarding environmental, labor and human rights matters and is included in general terms and conditions and contracts. This means that 100% of our suppliers must sign this charter to continue or start working with Devoteam SAS, and also receive at least once a year a social and environmental assessment.

Following the submission and reception of responses to the ESG questionnaire, we reach out 100% of the lowest-rated suppliers to identify areas for improvement and help them enhance their scores. Additionally, we aim to organize webinars for all our suppliers to address key topics such as environmental carbon footprint and the ethical code of conduct. These webinars will be designed to present our carbon footprint assessment to suppliers and provide them with training to improve their practices and their ratings.

In 2024 the governance was completed with a **Sustainable Purchase Committee** consisting of the purchase, compliance and CSR departments. Meeting at least monthly, they analyse the responses to the questionnaire, liaise with providers to suggest improvement, and coordinate the application in the different countries of the Group.

Locally, the Finance team is responsible for leading relationships with suppliers.

In 2020, our purchasing department received sustainable procurement training. Supported by the CSR department, they apply ISO 20400 recommendations daily. Some Devoteam locations - especially France and Corp - use CSR criteria in request for proposal (RFP) evaluations, with plans to expand this practice. A new responsible purchasing training session is planned for the first half of 2025.

Moreover, especially in France, the Purchasing department and Devoteam's "Mission Handicap" department are working together to contract with Adapted Enterprises (AE) and "Etablissement et Service d'Aide par le Travail" (Services for Help through Work, also called Disability Friendly Companies), for instance for recycling, taxi services or envelope filing services. This commitment allows Devoteam to expand its social impact outside the company by creating jobs for people with disabilities. Eleven Adapted Enterprises and Disability Friendly

Companies are referenced for Devoteam's internal needs and seven for co-contracting with customers.

Our goal today is to increase the share of purchases from Adapted Enterprises, particularly by integrating new suppliers in event planning, catering, cleaning services, etc. To this end, Devoteam's supplier catalog, available to anyone wishing to make an order, highlights AE and Disabled Friendly Companies suppliers for each purchasing category. We also aim to enhance communication about these adapted companies to encourage employees to consider them more frequently.

In 2024, we achieved a significant breakthrough by successfully deploying a comprehensive supplier due diligence process on a global scale. This initiative involved a rigorous assessment of suppliers based on various criteria, including legal compliance and alignment with Devoteam's corporate values. The results of this extensive evaluation were encouraging: over 57% of Devoteam's suppliers were classified as either A or B within the company's internal ranking system. This high percentage demonstrates that a majority of Devoteam's suppliers not only adhere to legal requirements but also uphold the company's core principles, fostering a supply chain that is both responsible and sustainable.

Subcontractors in Devoteam - GRI 2-8

Devoteam sometimes uses "subcontractors", however, they are not employees. Devoteam, which is the signatory of the contracts with the client, ensures the quality and reliability of the subcontractors, while also reinforcing its service delivery capabilities with freelancers or start-ups/ SMEs when specific required skills are not available among its own employees.

We use a digital platform to monitor subcontractors and manage contracts, ensuring they meet our duty of care standards.

In 2024, we contracted with subcontractors for the equivalent of 2,470 FTE in the entire Group.

One entity of Devoteam, BeTeam, specialized in intermediation and has contracted with half of the group subcontractors.

BeTeam allows its clients to address new skill pools (freelancers, SMEs, innovative start-ups) and to access the right skills at the right time. With its vendor consolidation management offer, Beteam allows both customers and suppliers to collaborate in a secure and simplified framework.

Our contracts with subcontractors include the requirement to apply our Code of Conduct and charters. When necessary they may complete the mandatory e-learning and certifications.

4.1.2 Actions [G1-3]

4.1.2.1 [G1-3] Prevention and detection of corruption and bribery

GRI 205-2, GRI 2-23

Every Devoteam employee has a responsibility to prevent corruption within the Group, and Devoteam addresses this topic with several actions, targeting those most susceptible to corruption within the Group.

Anti-Corruption Charter

The Anti-Corruption Charter defines the banned behaviours likely to be representative of corruption or influence peddling. It was approved by the Group's executive management and staff representative bodies in April 2019 and adopted by all of the Group's subsidiaries, in addition to the local charters already in place. A revision of this Charter will be carried out in 2025.

Training: to inform widely about Devoteam rules, an online training module "fighting against corruption" is available. The objective is to share best practices, prevent our employees from any situation of corruption, help to mitigate risk situations, and provide dedicated points of contact in case of suspicion.

The module is open to everyone at Devoteam, but more than 2700 employees from 20 entities were particularly targeted, mainly those with sales and management functions. Including the training directly in our Code of Conduct led to a 100 % success rate.

4.1.2.2 Fight against fraud

The Group is committed to mitigating fraud risk across the business. To prevent any fraudulent activity, Devoteam's Legal & Compliance department has a delegated authority programme which clearly communicates the types and sizes of transactions that certain employees are able to enter into on behalf of the Group. The Internal Audit department regularly performs audit assignments across the Group entities, which includes collecting evidence collection and testing the operating effectiveness of related controls in each specific entity.

4.1.2.3 Combating anti-competitive practices (GRI 206-1)

Devoteam operates in a highly competitive sector in which a monopoly situation is forbidden. Devoteam also cares to prevent financial dependence on any sector or client.

The Group's customer portfolio is mainly made up of large international accounts with significant financial resources and professional purchasing departments in charge of organising the competition between suppliers with referencing and requests for proposal (RFP).

None of Devoteam’s customers represents more than 5% of the Group’s annual revenue and the top 5 customers represent less than 20% of the Group’s consolidated revenue, which strongly limits the risk of concentration.

Devoteam Group is committed to a strategy of continuous innovation to provide the best advice to its clients. Devoteam categorically refuses to engage in price dumping or reach any agreement on prices with its competitors.

Devoteam employees potentially exposed to risks of corruption and anti-competitive practices (directors, operational managers, sales representatives, buyers, etc.) must all complete a digital training module. Human Resources department monitors the completion.

4.1.3 Targets and metrics
[G1-4] [G1-5] [G1-6] [S4-4 DP35]

GRI 205-3

Targets	2024	2023	2022
100% managers signing the code of conduct	100% managers signing the code of conduct	95% managers signing the code of conduct	99% managers signing the Code of Conduct
100% manager signing the related parties	97% manager signing the related parties	90% manager signing the related parties*	95% manager signing the related parties
100% Devoteamers trained on Ethics & AI	72% (GenAI level 1)	NA	NA
Devoteamers trained on Anticorruption (Scope: Devoteam SAS)	812	770	Not reported (scope change)
ISO 37001 (% in total workforce covered)	2 geographies covered (4.12%)	1 geography covered (0,5%)	NA

[G1-4] Confirmed incidents of corruption or bribery

Targets	2024	2023	2022
# alerts or notifications regarding corruption or bribery through the alert ethics system or any other communication channels	0	0	0
# convictions for breaches of anti-corruption and bribery laws	0	0	0

[S4-4 DP 35] Severe human rights issues and incidents connected to our consumers and/or end-users

Targets	2024	2023	2022
Severe human rights issues and incidents connected to our consumers and/or end-users	0	0	0



4.2 Cybersecurity (Entity-specific topic)

[S4-SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model

In today's digital world, security is paramount. With the constant rise of cyber threats and the increasing reliance on technology, safeguarding data and systems is crucial. For us, and for our subcontractors, this means maintaining robust security measures to protect our clients. We must ensure business continuity, even when faced with unexpected events that could seriously disrupt operations. By prioritising security, we build trust and ensure the reliable delivery of our services, so this is one of our most material topics.

4.2.1 Policies [MDR-P]

In order to best mitigate associated risks, information security within Devoteam is governed and championed at the highest level of the organisation.

As the global information security risk landscape continues to evolve, it remains a strategic focus for the group to protect its assets and respond to customers' demands and requirements.

A dedicated group security team led by the Group CISO is responsible for maintaining the information security management system (ISMS), a framework to assess the information security risk across the organisation and to design, implement and test mitigation strategies.

An essential pillar of the ISMS at Devoteam is a security focused culture and a security-by-design approach to all projects.

Furthermore, Devoteam has implemented a comprehensive suite of policies, including an Information Security Policy that aligns with NIS 2, ISO 27001, and GDPR standards, as well as specific policies for personal data, data retention, and other critical areas. These policy documents are supported by operational procedures and guidelines, ensuring practical implementation and consistent adherence to security standards. We maintain a robust documentation system that enables us to demonstrate compliance and effectively communicate with all stakeholders, including clients, partners, suppliers, and employees. Our Security team is committed to the daily application of these policies, continually striving to uphold the highest security standards and remain at the 'state of the art' in cybersecurity practices.

4.2.2 Actions [MDR-A]

The security team produces regular management reports on the status of information security at the group.

From the multitude of improvement activities conducted In 2024, we would like to highlight the following:

- Rolled out Unified Endpoint Management (UEM) and Endpoint Detection and Response (EDR) to more than 6000 devices,
- Promoted information security culture with a comprehensive awareness programme including phishing simulations, training courses and an onboarding curriculum. (All employees are trained as soon as they arrive in the basic security principles summarised in the “security standards”),
- Implemented a new risk assessment system to evaluate our suppliers and subcontractors.
- Updated our Information Security Policy (ISP).

- Improved our phishing simulation campaign process.
- Implemented an intra-group data protection agreement with our nearshore entities.
- Migrated several entity tenants to the centralized group IT tenant.
- Began our general compliance efforts towards NIS 2.

The security team is aligning the Devoteam Group, and in particular its IT Department, with the principles of ISO 27001, and several activities are certified internationally. We plan to be ISO27001 Certified by the end of 2025.

Our information system management maturity scores demonstrate our commitment to excellence in this domain. Our CyberVadis 2025 score of 906/1000 (Mature level, Gold Medal), based on ISO 27001 standard, reflects our strong position in cybersecurity.

		Value chain location			Time horizon		
		Upstream	Own operations	Short term	Short term	Medium term	Long term
Cybersecurity training for value Chain security: The impact of offering regular cybersecurity training to Devoteam staff leading to a better understanding and resulting in increased data security along the value chain.	Positive impact		x			x	
Risk of Cyber incident Risk of cyber incident in Devoteam or in its supply chain (including Ransomware Attacks, Distributed Denial of Service Attacks) leading to inability to access systems and resources, resulting in operational issues, reputational damages and loss of contracts.	Risk	x	x		x		
Incident caused by lack of employee awareness. The risk of low employee cybersecurity awareness leading to a security incident within Devoteam, resulting in data loss, operational issues and potential fines from the supervisory authority.	Risk		x			x	

Client Case:

Devoteam Foundation

Pour Un Sourire d’Enfant focuses on the education and well-being of the poorest children in Cambodia to ensure them a decent and dignified future. In 2024, they saw a need to enhance their cyber security measures to protect the sensitive information of their activity and the children they serve. Together with the association, Devoteam Foundation conducted a maturity audit of Pour Un Sourire d’Enfant assessing their processes, policies, and controls, and providing a remediation plan to strengthen their cyber security. This mission was executed in both their headquarters in France and in Cambodia, where Pour Un Sourire d’Enfant operates. With this support Pour Un Sourire d’Enfant, improved security and data protection capabilities, increased awareness of cyber risks, and enabled cost savings on audit expenses, allowing more funds to be directed toward supporting the poorest children.

En Avant Toute(s) is a French association protecting women and LGBTQIA+ individuals by providing a safe, anonymous chat platform for support, guidance, and resources, empowering them with the knowledge and confidence to escape violence and rebuild their lives. When integrating the chatbot to another system, they wanted to ensure high data security and good privacy management also when transferring the data from one system to the other. Devoteam Foundation France did an audit of the system integration, gave guidance to secure information transferred and recommendation of how to gouvernance the system. All for protecting the sensitive information of those using the platform, empowering them with the confidence to seek support and rebuild their lives.

Client Case:

Achieving Cybersecurity Excellence: Devoteam’s Partnership with a Major Energy Client

Our client, a major European energy provider, operates in a highly regulated sector with critical infrastructure and sensitive data. They are a large enterprise and have been a client for over 8 years.

The challenge

Operating in the regulated energy sector, the client needed to enhance cybersecurity and resilience to protect critical infrastructure and data. They aimed to achieve ISO 27001 certification by establishing an ISMS and conducting risk assessments. The client also sought to prepare for ISO 22301 certification for Business Continuity Management. Furthermore, they needed to extend the certification's scope and migrate to updated ISO standards without disrupting operations.

The solution

Devoteam Cyber Trust implemented a phased approach for the client, including:

- **ISO 27001 Implementation & Certification:** Conducted gap analysis, developed ISMS policies, performed risk assessments, and provided training, leading to certification within 12 months.

- **Post-Certification Support:** Implemented Devoteam's IntegrityGRC tool for effective compliance management and offered ongoing advisory services.
- **Scope Extension and Migration:** Managed scope expansion and supported migration to the latest ISO 27001 version.
- **Business Continuity:** Revised BIAs, conducted multiple risk assessments, updated continuity plans and ensured compliance with ISO 22301.

The result

As a result of the partnership, the client has:

- Achieved and maintained ISO 27001 certification for over 8 years.
- Improved operational efficiency using IntegrityGRC platform.
- Strengthened risk management practices.
- Built a scalable ISMS to support business growth.
- Prepared and implemented BCMS to achieve ISO 22301 certification.

Devoteam's Cyber Trust provides customised solutions to enhance security and achieve cybersecurity excellence, leveraging expertise in ISO 27001, ISO 22301, and advanced GRC tools to support clients in various industries against evolving cyber threats.

4.2.3 Targets & Metrics [MDR-T] [MDR-M]

Targets	2024	2023	2022
Become ISO 27001 at Group IT level (% in total workforce)	8 geographies certified (31%)	8 geographies certified (29.30%)	5 geographies certified
Cybervadis: at least maintain our maturity level. Increase our score	906/1000 Mature Level	885/1000 Mature level	951/1000 Mature level
Devoteamers trained on Data Protection	85.5%	90%	Not reported

Appendix



5.1 Our policies

GRI 2-23

Targets	2024	2023
Value	Devoteam sustainability policy: VEEP (Value, Environment, Ethics, People)	Global
	strategic plan: Amplify 2028	Global
Environment	Environmental policy	Global
	Travel policy - business travels	Global
	travel policy - commuting	Local*
	travel policy - fleet management	Local*
Value	Code of conduct	Global
Ethics	Anti-corruption charter	Global
	Economic sanctions compliance policy	Global
	Ethics alert line	Global
	Purchase policy	Global
	Sustainable marketing guidelines	Global
	Gen AI charter	Global
	IT policy	Global
People	Human rights policy	Global
	Health & safety	Global
	Diversity & inclusion policy - included in Human rights policy	Global
	anti slavery act - included in Human rights policy	Global
	Employee Value proposition - included in Human rights policy	Global
	Prevention of violence & Harassment	Local*
	Mental Health policy	Local*

* Devoteam SAS is covered by the local French policies.

5.2 Employees breakdown per country

		2024	2023	2022
GROUP	Total workforce	10171	10331	10262
	male	72%	72%	72%
	female	28%	28%	28%
	<30	30%	33%	34%
	30-50	60%	58%	56%
	>50	10%	10%	10%
Austria	Total workforce	42	38	37
	male	93%	92%	95%
	female	7%	8%	5%
	<30	31%	24%	16%
	30-50	45%	53%	57%
	>50	24%	24%	27%
Belgium	Total workforce	415	437	467
	male	86%	84%	84%
	female	14%	16%	16%
	<30	28%	33%	35%
	30-50	51%	49%	47%
	>50	21%	19%	18%
Czech Republic	Total workforce	119	109	189
	male	63%	63%	Non reported
	female	37%	37%	Non reported
	<30	29%	28%	Non reported
	30-50	68%	68%	Non reported
	>50	3%	4%	Non reported
Slovakia	Total workforce	22	14	Non reported
	male	73%	71%	Non reported
	female	27%	29%	Non reported
	<30	36%	36%	Non reported
	30-50	64%	64%	Non reported
	>50	0%	0%	Non reported

		2024	2023	2022
Denmark	Total workforce	328	347	371
	male	67%	67%	69%
	female	33%	33%	31%
	<30	20%	27%	34%
	30-50	60%	53%	51%
	>50	20%	20%	15%
France	Total workforce	4109	4219	4348
	male	69%	70%	69%
	female	31%	30%	31%
	<30	34%	38%	41%
	30-50	58%	55%	53%
	>50	8%	7%	6%
Germany	Total workforce	355	393	397
	male	76%	77%	77%
	female	24%	23%	23%
	<30	11%	15%	19%
	30-50	56%	54%	50%
	>50	33%	31%	32%
Indonesia	Total workforce	42	38	26
	male	64%	74%	Non reported
	female	36%	26%	Non reported
	<30	52%	47%	Non reported
	30-50	45%	50%	Non reported
	>50	2%	3%	Non reported
Italy	Total workforce	64	56	40
	male	75%	79%	88%
	female	25%	21%	12%
	<30	17%	14%	21%
	30-50	50%	52%	64%
	>50	33%	34%	14%

		2024	2023	2022
Lithuania (CMS)	Total workforce	75	77	61
	male	80%	79%	74%
	female	20%	21%	26%
	<30	35%	34%	37%
	30-50	64%	64%	61%
	>50	1%	3%	2%
Luxembourg	Total workforce	144	140	129
	male	78%	79%	78%
	female	22%	21%	22%
	<30	27%	31%	30%
	30-50	69%	66%	66%
	>50	3%	3%	3%
Middle East	Total workforce	648	593	502
	male	78%	20%	72%
	female	22%	80%	28%
	<30	34%	31%	35%
	30-50	63%	65%	60%
	>50	3%	4%	5%
Morocco	Total workforce	198	162	122
	male	51%	47%	59%
	female	49%	53%	41%
	<30	41%	43%	42%
	30-50	52%	49%	50%
	>50	7%	8%	8%
Netherlands	Total workforce	390	359	294
	male	83%	84%	84%
	female	33%	16%	16%
	<30	20%	24%	21%
	30-50	58%	57%	55%
	>50	22%	19%	23%

		2024	2023	2022
Norway	Total workforce	121	138	161
	male	59%	60%	60%
	female	41%	40%	40%
	<30	21%	20%	19%
	30-50	44%	46%	41%
	>50	36%	33%	34%
Poland	Total workforce	23	28	25
	male	78%	75%	Non reported
	female	22%	25%	Non reported
	<30	35%	43%	Non reported
	30-50	61%	54%	Non reported
	>50	4%	4%	Non reported
Portugal	Total workforce	1405	1408	1376
	male	73%	73%	74%
	female	27%	27%	26%
	<30	29%	31%	31%
	30-50	67%	65%	66%
	>50	4%	3%	3%

		2024	2023	2022
Serbia	Total workforce	131	144	134
	male	55%	57%	57%
	female	45%	43%	43%
	<30	42%	47%	50%
	30-50	55%	51%	46%
	>50	3%	2%	2%
Spain	Total workforce	1086	1002	944
	male	78%	77%	76%
	female	22%	23%	24%
	<30	30%	30%	30%
	30-50	60%	60%	59%
	>50	10%	10%	11%
Sweden	Total workforce	196	186	235
	male	72%	74%	52%
	female	28%	26%	48%
	<30	13%	22%	23%
	30-50	70%	65%	68%
	>50	17%	13%	8%

		2024	2023	2022
Tunisia	Total workforce	147	108	91
	male	62%	63%	59%
	female	38%	37%	41%
	<30	44%	38%	37%
	30-50	55%	61%	60%
	>50	1%	1%	2%
Turkey	Total workforce	22	25	26
	male	91%	96%	96%
	female	5%	4%	4%
	<30	23%	28%	32%
	30-50	68%	68%	68%
	>50	9%	4%	0%
United Kingdom	Total workforce	89	106	128
	male	73%	80%	79%
	female	24%	20%	21%
	<30	15%	22%	16%
	30-50	72%	65%	57%
	>50	13%	14%	19%



5.3 Carbon Footprint details & methodology

Performance Data - environment

	2024	2023	2022
Environmental management			
Employees covered by an ISO 14001-certified environmental management system	56%	42.88%	43.62%
Operational sites for which an environmental risk assessment has been carried out	36.51%	-	-
Employees who have taken sustainable IT training level 1, including environmental issues	32%	10%	-
GHG emissions	Metric tonnes of CO2e		
Changes in total carbon emissions compared to 2022 (base year) - market-based	-25.7%	-15.3%	-
Market-based emissions intensity (metric tonnes of CO2e/employee in headcount)	2.64	2.96	3.52
Scope 1	3,389	3,559	3,067
Scope 2 - market based	1,220	1,193	893
Scope 2 - location based	961	1,044	810
Scope 3	22,193	25,825	32,124
Scope 3 - Upstream	22,193	25,825	32,124
Scope 3 - Downstream	0	0	0
Total market-based emissions (tCO2e)	26,802	30,577	36,084
Total location-based emissions (tCO2e)	26,542	30,428	36,001
Energy used in our offices	MWh		
"Total electricity consumption (MWh) in our buildings Including electricity and air conditioning consumption. Some buildings are excluded from this energy consumption sum, but their CO2e emissions were then estimated from the number of m2 and source of energy."	3,354.83	3,184.66	2,902.20
Electricity from renewable source (MWh)	1,755.79	1,867.55	1,449.99
Electricity from renewable source (% of total electricity consumption)	52.3%	58.6%	50.0%
Wastes	Metric tonnes		
Total general waste generated	32.422	65.751	50.199
General waste recycled	18.353	15.396	12.719
Total non-hazardous waste	28.683	64.552	48.838
Total Hazardous waste (metric tonnes)	3.738	1.199	1.361
Recycled Hazardous waste	2.929	1.028	1.361

Carbon breakdown per geography

2024	Scope 1	Scope 2 Market-based	Scope 2 Location-based	Scope 3	Total tCO2e Market-based	Total tCO2e Location-based
AUSTRIA	31.24	1.75	3.14	119.49	152.48	153.87
BELGIUM	626.40	162.44	168.29	1,904.88	2,693.72	2,699.57
CZECH REPUBLIC	32.45	108.71	74.31	227.73	368.89	334.49
DENMARK	46.34	0.01	5.48	1,070.56	1,116.91	1,122.38
FRANCE	836.17	79.56	122.15	9,536	10,451.95	10,495
GERMANY	220.23	41.30	47.44	635.57	897.10	903.24
INDONESIA	1.16	17.83	17.86	73.80	92.79	92.82
ITALY	202.94	3.05	2.89	243.20	449.19	449.03
LITHUANIA	8.02	40.43	21.98	136.55	185.00	166.55
LUXEMBOURG	474.40	46.20	14.01	548.33	1,068.93	1,036.74
MOROCCO	128.57	0.01	7.56	537.04	665.62	673.17
MIDDLE EAST	15.75	162.92	163.40	2,193.96	2,372.63	2,373.11
NETHERLANDS	340.22	142.86	143.14	1,132.92	1,616.00	1,616.28
NORWAY	16.39	136.64	13.16	315.89	468.92	345.44
POLAND	0.01	2.80	1.99	38.83	41.64	40.83
PORTUGAL	159.47	154.94	31.56	1,370.29	1,684.70	1,561.32
SERBIA	26.00	43.70	45.67	130.27	199.97	201.94
SLOVAKIA	1.99	2.19	0.64	29.51	33.69	32.14
SPAIN	202.70	15.73	20.32	793.96	1,012.39	1,016.98
SWEDEN	6.23	33.45	29.83	524.09	563.77	560.15
TUNISIA	11.34	22.51	22.63	330.55	364.40	364.52
UK	0.71	0.76	2.84	290.37	291.84	293.92

Methodology

Devoteam has developed this Inventory Management Plan (IMP) to outline the institutional, managerial, and technical procedures and processes used annually to collect and manage reliable, quality greenhouse gas (GHG) data.

The primary objective of these procedures is to minimize the potential for errors thereby ensuring the credibility of internal and external GHG reporting activities.

Devoteam quantifies emissions data annually on a calendar year basis.

The calendar year for this CY2024 inventory is for the period January 1, 2024 through December 31, 2024.

Scope

Devoteam defines its organizational boundaries using the **Operational Control approach** per the World Resource Institute (WRI)/World Business Council for Sustainable Development (WBCSD) Greenhouse Gas (GHG) Protocol.

Under this approach, Devoteam will account for 100% of the GHG emissions from operations over which it has control. This includes domestic and international properties (home offices, data centers, and garages) which are either owned or leased by Devoteam and for which Devoteam has operational control. Devoteam is continuing to evaluate gaps in emissions from owned facilities and vehicles and formulating a plan for inclusion in a future GHG Inventory. Licences purchased for reselling are excluded.

Accounting principles

Devoteam conducts and reports on a baseline analysis of four (4) greenhouse gases: CO2 (Carbon Dioxide), CH4 (Methane) N2O (Nitrous Oxide), and HFCs (Hydrofluorocarbons). Devoteam currently has no emissions from PFCs, NF3 or SF6.

We calculate CO2e emissions using the global warming potential values set out in the assessment reports of the United Nations Intergovernmental Panel on Climate Change (IPCC). For all methodologies, we use either integrated reports (AR4/AR5/AR6) or applied reports (AR4/AR5/AR6).

- Scope 1 emissions:** Direct sources of emissions are identified for Devoteam in the table below. In 2024, Devoteam will continue to review gaps in its Scope 1 GHG emission sources and will formulate a plan to include emissions from diesel generators, mobile and refrigeration use in future inventories.
- Scope 2 emissions:** The inventory includes consumption of electricity, which is used

by Devoteam's domestic and international properties which are either owned or leased by Devoteam and for which Devoteam has operational control. It also includes the consumption of electric cars as well as district heating. The inventory includes both Scope 2 location-based and market-based methods.

- **Scope 3:** Scope 3 emissions in Devoteam's GHG inventory currently include:
 1. Purchased goods & services including IT licenses.
 2. Capital Goods.
Capital goods include IT assets manufacturing and company vehicles manufacturing.
 3. Fuel and energy-related emissions not included in scope 1 or scope 2.
 5. Waste generated in operations.
 6. Business travels.
 7. Employee commuting.

Scope 3 emissions of the following categories have been excluded because not relevant.

4. Upstream transportation & distribution: not applicable as Devoteam is a Service company.
8. Upstream leased assets: Not applicable to Devoteam. If facilities are leased, energy consumption is included in Scope 1 & 2.
9. Downstream transport & distribution: visitors and customer travel.
10. Processing of sold products: not applicable as Devoteam does not produce any intermediate products.
11. Use of sold products: since Devoteam do not produce any physical products, these emissions are classified as "INDIRECT" use of sold products.

12. End-of-life treatment of sold products: This category is not applicable to Devoteam as it does not produce any physical products that require "waste disposal and treatment of products sold by the reporting company (in the reporting year) at the end of their life".
13. Downstream leased assets: Non applicable as Devoteam has no downstream leased assets.
14. Franchises: Non applicable as Devoteam has no franchises.
15. Investments: A minority participation in a Russia-based company through two subsidiaries of Devoteam has been excluded because of the size and indirect revenue.

Emission factors

Emission factors used are mainly from ADEME, IAE, AIB, EXIOBASE 3, Citeo, UK Government GHG Conversion Factors for Company Reporting. A high number was also provided by our providers, especially those related to the IT purchase and digital services. We also customized some emission factors (for example train).

As a general rule, we favour the raw data supplied by the supplier, followed by the physical data, then the estimates by ratiomonetary, surface area or number of employees.

Quality Assurance

One potential source of uncertainty in the inventory is if facilities or emission sources from the inventory are not identified. Devoteam reviews the data submitted by the sites to make sure all sites and all sources are included.

Another potential source of uncertainty is errors in billing by electricity and fuel suppliers, and errors in entering and transferring data. The Inventory Manager will check for consumption irregularities to ensure that it conforms to expected seasonal patterns and that there are not larger-than-expected discrepancies over time.

The third source of uncertainty is the emission factors. Devoteam selects the most updated emission factors.

More details about our methodology and emission factors are available in our Inventory Management Plan.



5.4 [IRO-2] List of disclosure requirements met

Disclosure Requirements complied with	Name	Section in the sustainability report	Non-material	Omitted per phased-in disclosure requirements
ESRS 2	General disclosures	Page 16		
BP-1	General basis for preparation of the sustainability statement	Page 18		
BP-2	Disclosures in relation to specific circumstances	Page 18		
GOV-1	The role of the administrative, management and supervisory bodies	Page 18		
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	Page 18		
GOV-3	Integration of sustainability-related performance in incentive schemes	Page 20		
GOV-4	Statement on due diligence	Page 20		
GOV-5	Risk management and internal controls over sustainability reporting	Page 21		
SBM-1	Strategy, business model and value chain	Page 22		
SBM-2	Interests and views of stakeholders	Page 23		
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Page 24		
IRO-1	Description of the process to identify and assess material impacts, risks and opportunities	Page 25		
IRO-2	Disclosure Requirements in ESRS covered by the undertaking's sustainability statement	Page 26		
ESRS E1	Climate change	Page 27		
E1.GOV-3	Integration of sustainability-related performance in incentive schemes	Page 20		
E1-1	Transition plan for climate change mitigation	Page 28		
E1.SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Page 27		
E1.IRO-1	Description of the processes to identify and assess material climate-related impacts, risks and opportunities	Page 28		
E1-2	Policies related to climate change mitigation and adaptation	Page 28		
E1-3	Actions and resources in relation to climate change policies	Page 28		
E1-4	Targets related to climate change mitigation and adaptation	Page 31		
E1-5	Energy consumption and mix	Page 32		

Disclosure Requirements complied with	Name	Section in the sustainability report	Non-material	Omitted per phased-in disclosure requirements
E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	Page 32		
E1-7	GHG removals and GHG mitigation projects financed through carbon credits	Page 32		
E1-8	Internal carbon pricing	Page 32		
E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities			X
ESRS E2	Pollution		X	
ESRS E3	Water and Marine resources		X	
ESRS E4	Biodiversity and Ecosystems	Page 33		
E4.SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model		X	
E4.IRO-1	Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities	Page 25	Non material but voluntarily reported	
E4-1	Transition plan and consideration of biodiversity and ecosystems in strategy and business model		X	
E4-2	Policies related to biodiversity and ecosystems	Page 33	Non material but voluntarily reported	
E4-3	Actions and resources related to biodiversity and ecosystems	Page 33	Non material but voluntarily reported	
E4-4	Targets related to biodiversity and ecosystems		X	
E4-5	Impact metrics related to biodiversity and ecosystems change		X	
E4-6	Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities			X
ESRS E5	Resource use and Circular economy	Page 34		
E5.IRO-1	Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities	Page 25		
E5-1	Policies related to resource use and circular economy	Page 34		
E5-2	Actions and resources related to resource use and circular economy	Page 34		
E5-3	Targets related to resource use and circular economy	Page 35		
E5-4	Resource inflows		X	
E5-5	Resource outflows	Page 35		

List of disclosure requirements met - part 2

Disclosure Requirements complied with	Name	Section in the sustainability report	Non-material	Omitted per phased-in disclosure requirements
E5-6	Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities		X	
ESRS S1	Own workforce	Page 36		
S1.SBM-2	Interests and views of stakeholders	Page 23		
S1.SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Page 36		
S1-1	Policies related to own workforce	Page 38, 41, 42, 44		
S1-2	Processes for engaging with own workers and workers' representatives about impacts	Page 37		
S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	Page 37		
S1-4	Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	Page 39, 41, 42, 45		
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Pages 41, 42, 44, 47		
S1-6	Characteristics of the undertaking's employees	Page 48		
S1-7	Characteristics of non-employee workers in the undertaking's own workforce	Page 49		X
S1-8	Collective bargaining coverage and social dialogue	Page 42		
S1-9	Metrics related to diversity	Page 48		
S1-10	Adequate wages	Page 42		
S1-11	Social protection	Pages 41, 42		
S1-12	Persons with disabilities	Page 48		X
S1-13	Training and skills development metrics	Page 44		X
S1-14	Health and safety metrics	Page 40		
S1-15	Work-life balance metrics	Pages 38, 41		X
S1-16	Compensation metrics (pay gap and total compensation)	Page 48		

Disclosure Requirements complied with	Name	Section in the sustainability report	Non-material	Omitted per phased-in disclosure requirements
S1-17	Incidents, complaints and severe human rights impacts	Page 48		
ESRS S2	Workers in the value chain		X	
ESRS S3	Affected communities		X	
ESRS S4	Consumers and end-users (Data privacy focus)	Page 50		
S4.SBM-2	Interests and views of stakeholders	Page 23		
S4.SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Page 50		
S4-1	Policies related to consumers and end-users	Page 50		
S4-2	Processes for engaging with consumers and end-users about impacts	Page 50		
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	Page 50		
S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	Page 51		
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Page 51		
ESRS G1	Business conduct	Page 56		
G1.GOV-1	The role of the administrative, management and supervisory bodies	Page 56		
G1.IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	Page 56		
G1-1	Business conduct policies and corporate culture	Page 57		
G1-2	Management of relationships with suppliers	Page 57		
G1-3	Prevention and detection of corruption and bribery	Page 58		
G1-4	Confirmed incidents of corruption or bribery	Page 59		
G1-5	Political influence and lobbying activities			
G1-6	Payment practices	X		

5.5 [IRO-2] Table of all data points deriving from other eu legislation

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Section in the sustainability report
ESRS 2 GOV-1 21 d) Board's gender diversity	X		X		Page 48
ESRS 2 GOV-1 21 e) Percentage of board members who are independent			X		Page 19
ESRS 2 GOV-4 30 Statement on due diligence	X				Page 20
ESRS 2 SBM-1 40d) i) Involvement in activities related to fossil fuel	X	X	X		Page 22
ESRS 2 SBM-1 40d) ii) Involvement in activities related to chemical production	X		X		N/A
ESRS 2 SBM-1 40d) iii) Involvement in activities related to controversial weapons	X		X		N/A
ESRS 2 SBM-1 40d) iv) Involvement in activities related to cultivation and production of tobacco			X		N/A
ESRS E1-1 14 Transition plan to reach climate neutrality by 2050				X	Page 28
ESRS E1-1 16 g) Undertakings excluded from Paris-aligned Benchmarks		X	X		Page 65
ESRS E1-4 34 GHG emission reduction targets	X	X	X		Page 31
ESRS E1-5 38 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors)	X				N/A
ESRS E1-5 37 Energy consumption and mix					Page 32
ESRS E1-5 40-43 Energy intensity associated with activities in high climate impact sectors	X				N/A
ESRS E1-6 44 Gross Scope 1, 2, 3 and Total GHG emissions	X	X	X		Page 32
ESRS E1-6 53-55 Gross GHG emissions intensities	X	X	X		Page 32
ESRS E1-7 56 GHG removals and carbon credits			X		Page 32
ESRS E1-9 66 Exposure of the benchmark portfolio to climate-related physical risks		X			Page 27

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Section in the sustainability report
ESRS E1-9 66 a) Disaggregation of monetary amounts by acute and chronic physical risk		X			N/A
ESRS E1-9 66 c) Location of significant assets at material physical risk		X			N/A
ESRS E1-9 67 c) Breakdown of the carrying value of its real estate assets by energy-efficiency classes		X			N/A
ESRS E1-9 69 Degree of exposure of the portfolio to climate-related opportunities			X		N/A
ESRS E2-4 28 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil.	X				N/A
ESRS E3-1 9 Water and marine resources	X				Non material
ESRS E3-1 13 Dedicated policy	X				Non material
ESRS E3-1 14 Sustainable oceans and seas	X				Non material
ESRS E3-4 28 c) Total water recycled and reused paragraph	X				Non material
ESRS E3-4 29 Total water consumption in m3 per net revenue on own operations	X				Non material
ESRS 2- SBM 3 - E4 16a) i	X				Non material
ESRS 2- SBM 3 - E4 16b)	X				Non material
ESRS 2- SBM 3 - E4 16c)	X				Non material
ESRS E4-2 24 b) Sustainable land / agriculture practices or policies	X				Non Material
ESRS E4-2 24 c) Sustainable oceans / seas practices or policies	X				Non Material
ESRS E4-2 24 d) Policies to address deforestation	X				Non Material
ESRS E5-5 37 d) Non-recycled waste	X				Page 35
ESRS E5-5 39 Hazardous waste and radioactive waste	X				Page 35

Table of all data points deriving from other eu legislation - part 2

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Section in the sustainability report
ESRS 2- SBM3 - S1 14 f) Risk of incidents of forced labour	X				Non Material
ESRS 2- SBM3 - S1 14 g) Risk of incidents of child labour	X				Non Material
ESRS S1-1 20 Human rights policy commitments	X				Page 10
ESRS S1-1 21 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8			X		Page 57
ESRS S1-1 22 Processes and measures for preventing trafficking in human beings	X				Non Material
ESRS S1-1 23 Workplace accident prevention policy or management system	X				Page 39
ESRS S1-3 32 c) Grievance/ complaints handling mechanisms	X				Page 37
ESRS S1-14 88 b) c) Number of fatalities and number and rate of work-related accidents paragraph	X		X		Page 40
ESRS S1-14 88 e) Number of days lost to injuries, accidents, fatalities or illness	X				Page 40
ESRS S1-16 97 a) Unadjusted gender pay gap	X		X		Page 48
ESRS S1-16 97 b) Excessive CEO pay ratio	X				N/A
ESRS S1-17 103 a) Incidents of discrimination	X				Page 48
ESRS S1-17 104 a) Non-respect of UNGPs on Business and Human Rights and OECD	X		X		Page 48
ESRS 2- SBM3 – S2 11 b) Significant risk of child labour or forced labour in the value chain	X				Non Material
ESRS S2-1 17 Human rights policy commitments	X				Non Material

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Section in the sustainability report
ESRS S2-1 18 Policies related to value chain workers	X				Non Material
ESRS S2-1 19 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines	X		X		Non Material
ESRS S2-1 19 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8,			X		Non Material
ESRS S2-4 36 Human rights issues and incidents connected to its upstream and downstream value chain	X				Non Material
ESRS S3-1 16 Human rights policy commitments			X		Non Material
ESRS S3-1 17 Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines	X		X		Non Material
ESRS S3-4 36 Human rights issues and incidents	X				Non Material
ESRS S4-1 16 Policies related to consumers and end-users	X				Page 50
ESRS S4-1 17 Non-respect of UNGPs on Business and Human Rights and OECD guidelines	X		X		N/A
ESRS S4-4 35 Human rights issues and incidents	X				Page 59
ESRS G1-1 10 b) United Nations Convention against Corruption	X				Page 11
ESRS G1-1 10 d) Protection of whistle- blowers	X				Page 57
ESRS G1-4 24 a) Fines for violation of anti-corruption and anti-bribery laws	X		X		Page 59
ESRS G1-4 24 b) Standards of anti-corruption and anti- bribery	X				Page 59

5.6 GRI Index table

Devoteam sustainability report is built in alignment to the Global Reporting Initiative (GRI) universal standards (core option) and is partially compliant with the GRI comprehensive option (GRI topics standards).

The figures presented are accumulated for the 2024 fiscal year for all active reporting units, unless stated otherwise. An operational control approach was used for consolidations. It encompasses material aspects defined in the double materiality assessment described in “Double Materiality Assessment Process” and has undergone external assurance.

- In this report, Devoteam applies the GRI 9 requirements:
- **Requirement 1:** Apply the reporting principles: Accuracy, Balance, Clarity, Comparability, Completeness, Sustainability context, Timeliness, Verifiability
 - **Requirement 2:** Report the disclosures in GRI 2: General Disclosures 2021
 - **Requirement 3:** Determine material topics
 - **Requirement 4:** Report the disclosures in GRI 3: Material Topics 2021
 - **Requirement 5:** Report disclosures from the GRI Topic Standards for each material topic
 - **Requirement 6:** Provide reasons for omission for disclosures and requirements that the organization cannot comply with
 - **Requirement 7:** Publish a GRI content index
 - **Requirement 8:** Provide a statement of use
 - **Requirement 9:** Notify GRI

GRI content index 2024					
"Statement of use		Devoteam has reported in accordance with the GRI Standards for the period 01.01.2024 - 31.12.2024			
GRI 1 used		GRI 1: Foundation 2021			
Applicable GRI Sector Standard(s)		Universal Standards			
Legal name and form		Devoteam SAS			
Nature of ownership		Privately owned			
Headquarter		Levallois-Perret (France)			
GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION Sustainability report 2024	OMISSION		
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION
General disclosures					
	2-1 Organizational details	Pages 6, 22			Non Material
	2-2 Entities included in the organization's sustainability reporting	Pages 6, 18			Non Material
	2-3 Reporting period, frequency and contact point	Page 18			Metric E5
	2-4 Restatements of information	Page 18			Metric E5
	2-5 External assurance	Pages 18, 75			
	2-6 Activities, value chain and other business relationships	Page 22			
	2-7 Employees	Page 48			Editorial: Letter of commitment
	2-8 Workers who are not employees	Page 49			Voir G1 2
	2-9 Governance structure and composition	Page 18			NA
	2-10 Nomination and selection of the highest governance body	Page 18			"Social Information/Own workforce/Working conditions/
	2-11 Chair of the highest governance body	Page 18			Work life balance and health and safety/Policies related to work life balance and health and safety"
	2-12 Role of the highest governance body in overseeing the management of impacts	Page 18			
	2-13 Delegation of responsibility for managing impacts	Page 18			
	2-14 Role of the highest governance body in sustainability reporting	Page 18			
	2-15 Conflicts of interest	Page 57			
	2-16 Communication of critical concerns	Page 18			
	2-17 Collective knowledge of the highest governance body	Page 18			
	2-18 Evaluation of the performance of the highest governance body	Page 20			

GRI content index 2024					
GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION Sustainability report 2024	OMISSION		
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION
General disclosures					
	2-19 Remuneration policies	Page 41			
	2-20 Process to determine remuneration	Page 41			
	2-21 Annual total compensation ratio			Confidentiality constraints	
	2-22 Statement on sustainable development strategy	Page 5			
	2-23 Policy commitments	Pages 10, 12, 13, 57, 58, 63			
	2-24 Embedding policy commitments	Pages 10, 57			
	2-25 Processes to remediate negative impacts	Pages 24, 25, 37, 50			
	2-26 Mechanisms for seeking advice and raising concerns	Pages 37, 57			
	2-27 Compliance with laws and regulations	Page 57			
	2-28 Membership associations	Page 11			
	2-29 Approach to stakeholder engagement	Pages 23, 55			
	2-30 Collective bargaining agreements	Page 38			
Material topics					
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Page 25			
	3-2 List of material topics	Page 24			
	3-3 Management of material topics	Page 24			
Economic performance					
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed		X	Confidentiality constraints	
	201-2 Financial implications and other risks and opportunities due to climate change		X	Information unavailable/incomplete	
	201-3 Defined benefit plan obligations and other retirement plans		X	Confidentiality constraints	
	201-4 Financial assistance received from government		X	Not applicable	
Market presence					
GRI 202: Market Presence 2016	202-1 Ratios of standard entry level wage by gender compared to local minimum wage		X	Information unavailable/incomplete	
	202-2 Proportion of senior management hired from the local community		X	Not applicable	

GRI content index 2024					
GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION Sustainability report 2024	OMISSION		
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION
Indirect economic impacts					
	203-2 Significant indirect economic impacts		X	Not applicable	
Procurement practices					
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers		X	Information unavailable/incomplete	
Anti-corruption					
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	Page 25			
	205-2 Communication and training about anti-corruption policies and procedures	Page 58			
	205-3 Confirmed incidents of corruption and actions taken	Page 59			
Anti-competitive behavior					
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Page 58			
Tax					
GRI 207: Tax 2019	207-1 Approach to tax		X	Confidentiality constraints	
	207-2 Tax governance, control, and risk management		X	Confidentiality constraints	
	207-3 Stakeholder engagement and management of concerns related to tax		X	Confidentiality constraints	
	207-4 Country-by-country reporting		X	Confidentiality constraints	
Materials					
GRI 301: Materials 2016	301-1 Materials used by weight or volume		X	Not applicable	We are a service company
	301-2 Recycled input materials used		X	Not applicable	We are a service company
	301-3 Reclaimed products and their packaging materials		X	Not applicable	We are a service company
Energy					
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Page 32			
	302-2 Energy consumption outside of the organization		X	Information unavailable/incomplete	
	302-3 Energy intensity	Page 32			
	302-4 Reduction of energy consumption	Page 32			
	302-5 Reductions in energy requirements of products and services	Page 30			

GRI content index 2024					
GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION Sustainability report 2024	OMISSION		
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION
Water and effluents					
GRI 303: Water and Effluents 2018	302-1 Energy consumption within the organization		X	Not applicable	Water consumption is not highly material topic for Devoteam (Service Company)
	302-2 Energy consumption outside of the organization		X	Not applicable	Water consumption is not highly material topic for Devoteam (Service Company)
	302-3 Energy intensity		X	Not applicable	Water consumption is not highly material topic for Devoteam (Service Company)
	302-4 Reduction of energy consumption		X	Not applicable	Water consumption is not highly material topic for Devoteam (Service Company)
	302-5 Reductions in energy requirements of products and services		X	Not applicable	Water consumption is not highly material topic for Devoteam (Service Company)
Biodiversity					
GRI 304: Biodiversity 2016	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas		X	Not applicable	
	304-2 Significant impacts of activities, products and services on biodiversity		X	Not applicable	
	304-3 Habitats protected or restored		X	Not applicable	
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations		X	Not applicable	
Emissions					
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Page 32			
	305-2 Energy indirect (Scope 2) GHG emissions	Page 32			
	305-3 Other indirect (Scope 3) GHG emissions	Page 32			
	305-4 GHG emissions intensity	Page 32			
	305-5 Reduction of GHG emissions	Pages 28 to 31			
	305-6 Emissions of ozone-depleting substances (ODS)			Not applicable	We are a service company
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions			Not applicable	We are a service company

GRI content index 2024					
GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION Sustainability report 2024	OMISSION		
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION
Waste					
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	Page 34			
	306-2 Management of significant waste-related impacts	Page 34			
	306-3 Waste generated	Page 35			
	306-4 Waste diverted from disposal	Page 35			
	306-5 Waste directed to disposal	Page 35			
Supplier environmental assessment					
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	Pages 29, 57			
	308-2 Negative environmental impacts in the supply chain and actions taken	Page 57			
Employment					
GRI 401: Employment 2016	308-1 New suppliers that were screened using environmental criteria	Page 49			
	308-2 Negative environmental impacts in the supply chain and actions taken				
	308-2 Negative environmental impacts in the supply chain and actions taken				
Labor/management relations					
GRI 402: Labor/ Management Relations 2016	402-1 Minimum notice periods regarding operational changes		X	Information unavailable/incomplete	Depending on the countries
Occupational health and safety					
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Page 39			
	403-2 Hazard identification, risk assessment, and incident investigation	Page 39			
	403-3 Occupational health services	Page 39			
	403-4 Worker participation, consultation, and communication on occupational health and safety	Page 39			
	403-5 Worker training on occupational health and safety	Page 39			
	403-6 Promotion of worker health	Page 39			
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Page 39			

GRI content index 2024					
GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION Sustainability report 2024	OMISSION		
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION
	403-8 Workers covered by an occupational health and safety management system	Page 39			
	403-9 Work-related injuries	Page 40			
	403-10 Work-related ill health	Page 40			
Training and education					
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Page 44			
	404-2 Programs for upgrading employee skills and transition assistance programs	Page 42			
	404-3 Percentage of employees receiving regular performance and career development reviews	Page 44			
Diversity and equal opportunity					
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Page 48			
	405-2 Ratio of basic salary and remuneration of women to men	Page 48			
Non-discrimination					
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	Page 48			
Freedom of association and collective bargaining					
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk		X	Not applicable	This risk has been screened and is not highly material
Child labor					
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor		X	Not applicable	This risk has been screened and is not highly material
Forced or compulsory labor					
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor		X	Not applicable	This risk has been screened and is not highly material
Security practices					
GRI 410: Security Practices 2016	410-1 Security personnel trained in human rights policies or procedures		X	Not applicable	This risk has been screened and is not highly material
Rights of indigenous peoples					
GRI 411: Rights of Indigenous Peoples 2016	411-1 Incidents of violations involving rights of indigenous peoples		X	Not applicable	This risk has been screened and is not highly material

GRI content index 2024					
GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION Sustainability report 2024	OMISSION		
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION
Local communities					
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	Page 55			
	413-2 Operations with significant actual and potential negative impacts on local communities		X	Not applicable	This risk has been screened and is not highly material
Supplier social assessment					
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	Page 57			
	414-2 Negative social impacts in the supply chain and actions taken	Page 57			
Public policy					
GRI 415: Public Policy 2016	415-1 Political contributions		X	Legal prohibitions	
Customer health and safety					
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories		X	Not applicable	We are a B2B service company
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services		X	Not applicable	We are a B2B service company
Marketing and labeling					
GRI 417: Marketing and Labeling 2016	417-1 Requirements for product and service information and labeling		X	Not applicable	We are a B2B service company
	417-2 Incidents of non-compliance concerning product and service information and labeling		X	Not applicable	We are a B2B service company
	417-3 Incidents of non-compliance concerning marketing communications		X	Not applicable	We are a B2B service company
Customer privacy					
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Pages 51, 57			

5.7. Assurance

This report was audited by Grant Thornton in April 2024. (GRI 2-5)

Audit evidence is available on demand.

5.8 Acknowledgements & contact

This report was coordinated by

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