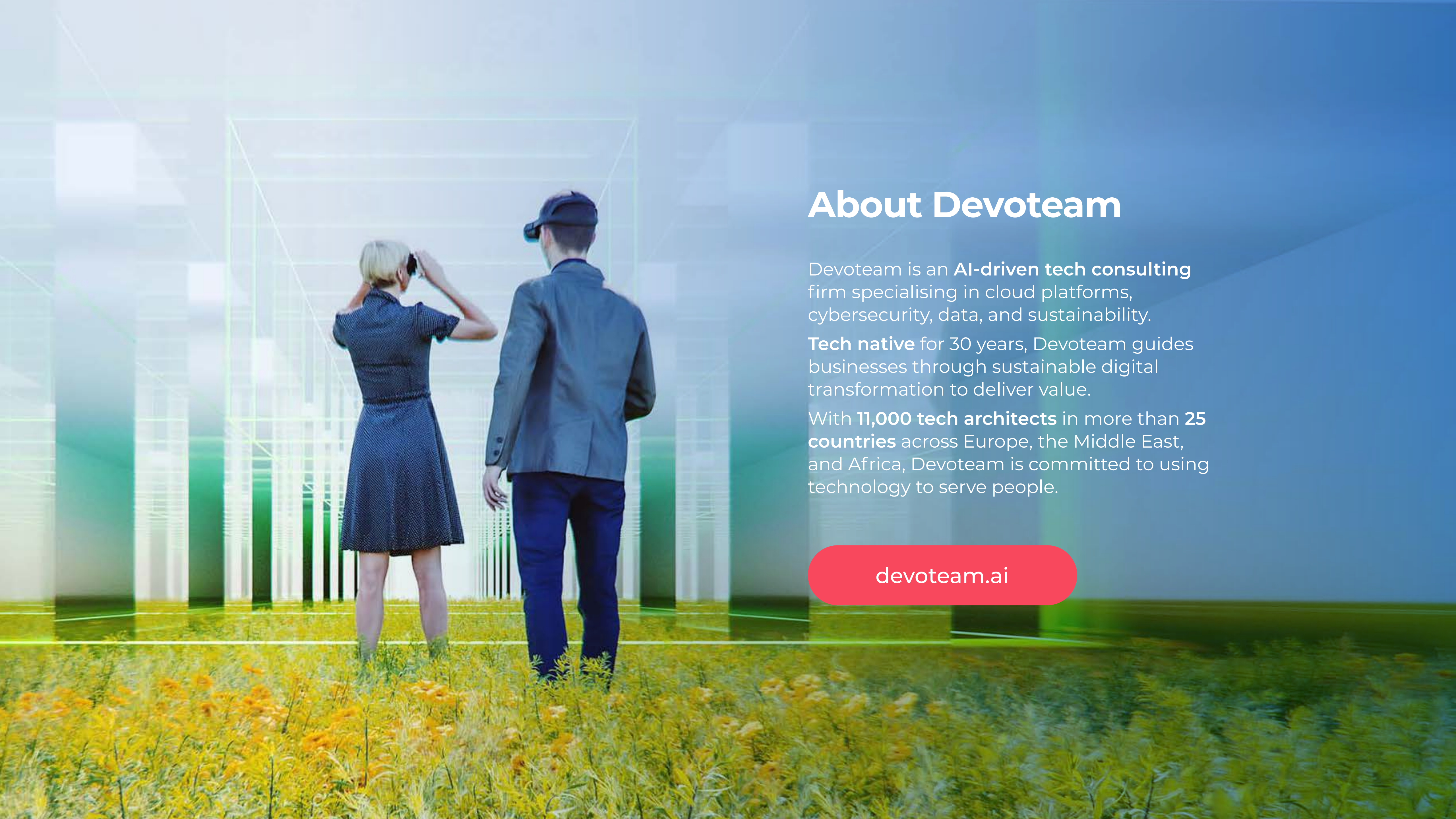




2025

Sustainability Report

AI-driven tech consulting



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 **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

To our Devoteamers, Partners, and Clients,

Since Devoteam's creation, 30 years ago, technology has defined our core, while we have always put people first. Our **"Tech for People"** vision ensures that people remain our true focus as we build a world where innovation drives sustainable progress and fosters a future we can rely on. Following our strategic **Amplify** plan to build an **AI-driven transformation for sustainable value**, we are in 2026 taking the next step to build on this long-standing momentum.

To drive an sustainable AI transformation aligned with the United Nations Global Compact principles alongside our clients, we invest heavily in the expertise of our people:

- **GenAI Level 1 (2h 25m)**: 75% of Devoteamers have completed this foundational programme, which provides practical frameworks for daily work, including modules on identifying and maintaining a critical eye on potential biases and sources of information
- **AI Level 2 (20h)**: 34% of our consultants have achieved this advanced, role-specific certification, demonstrating deep technical mastery and understanding of the broader impact of AI
- **Sustainable IT (3h)**: 39% of our people are certified in this programme, which embeds sustainable practices into our daily digital activities

Our commitment to the **Science-Based Target initiative (SBTi)** was approved in 2024 and we continue to develop action plans to reduce our carbon emissions and minimise our pressure on natural resources. As a service company, our physical footprint differs from industrial sectors; however, we take our responsibility for our operational impact. This commitment includes enforcing a "public transport first" policy for consultant travel and maintaining an e-waste management strategy.

We have expanded our number of **ISO certified entities** (9001, 27001, 14001, 37001, 45001). Notably, the UK has become the first country to achieve **ISO 42001** certification, an international standard for Artificial Intelligence Management Systems (AIMS), which helps organisations use AI responsibly. Furthermore, our increased **CyberVadis** score recognises our efforts in data protection and cybersecurity within tense geopolitical contexts.

Last year, we aligned our reporting with the European **Corporate Sustainability Reporting Directive (CSRD)** standard. The Omnibus "stop-the-clock" decision, taken by the EU at the beginning of 2025, extended our mandatory reporting timeline by two years; we are now obligated to report our impact according to CSRD in 2028 based on 2027 data. We are using this extension to invest in better data tracking and governance, keeping us focused on our main goals.

Devoteam's sustainability agenda, **VEEP** for Value, Environment, Ethics and People, remains strong. As we embrace the opportunities of the coming years, we remain dedicated to turning these principles into concrete actions, ensuring that our transformation delivers a sustainable impact for future generations.

Best Regards,



Sébastien Chevrel
Group Managing Director



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 the heartbeat of our culture. We believe that an entrepreneurial spirit is naturally fueled by curiosity, which is why we have built our organisation as a learning company. This mindset allows us to attract and nurture a community of 10,000 specialists, creating a high talent density that is always evolving. Strong partnerships have always been central to our DNA, which is why we collaborate closely with both established tech giants and emerging innovative startups. This ecosystem enables us to provide long-lasting solutions that help clients lead their industries.

OUR VISION
Tech for People

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

Revenue
€1,116M
-0.8% vs 2024

Our presence
25 countries



Our strategy

At Devoteam, tech and people are the two pillars of our DNA, brought to life through our "tech for people" vision. By using AI responsibly, we are shaping a world where innovation fosters meaningful progress and secures a future we can rely on.

Our Amplify 2024-28 strategic plan

Our Amplify strategic plan has the main objectives:

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

Advancing Sustainability through AI and Innovation

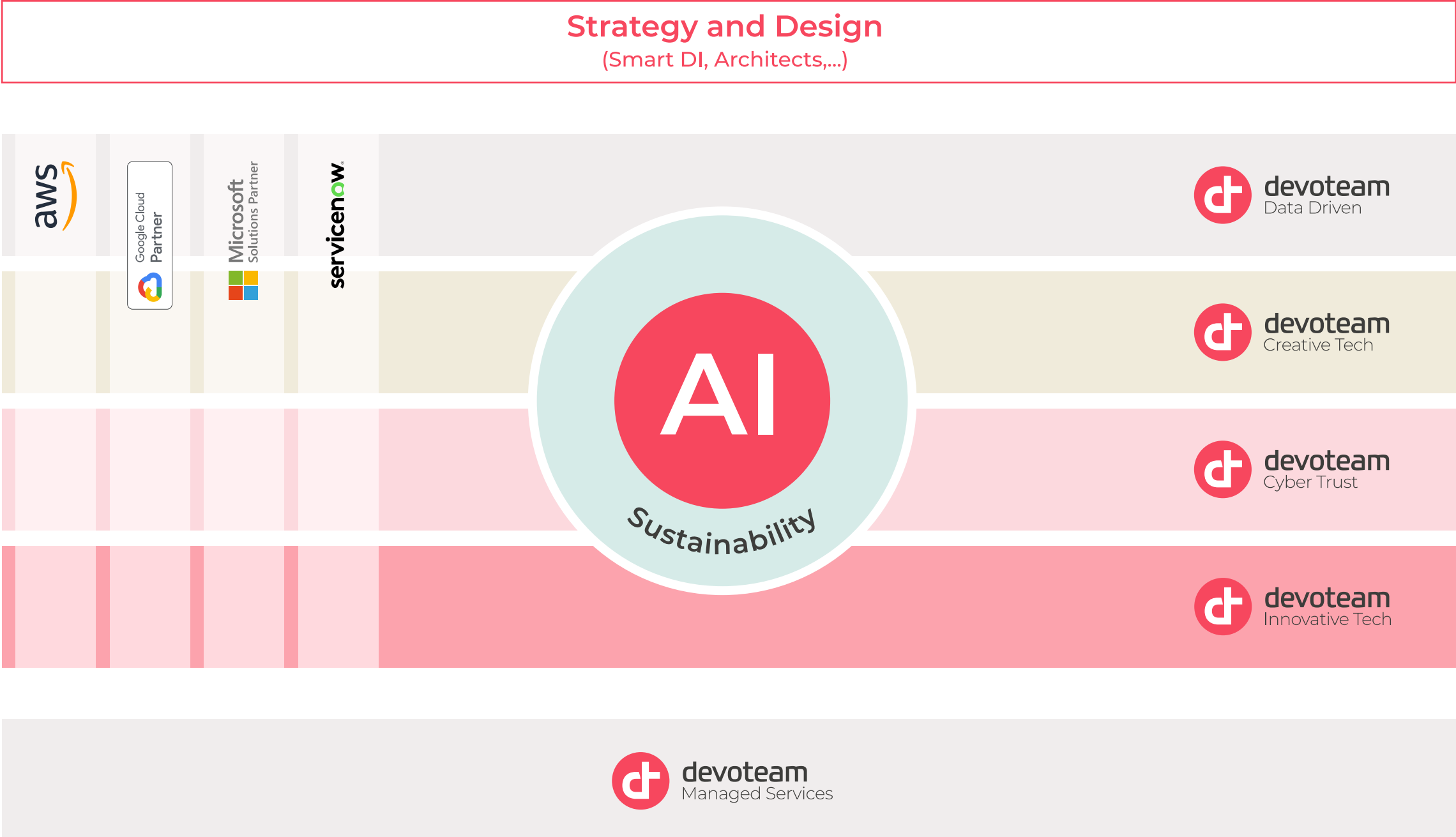
At Devoteam, we know that AI is a fundamental business driver. Our approach is to deliver the best solutions for our clients' market situations, guided by a clear strategic vision and roadmap. Lasting value in AI comes from two things: understanding and trust. By combining AI literacy with a rigorous ethical framework, we bring our "tech for people" vision to life. We make sure that responsible AI is the standard for everything we create, ensuring innovation never comes at the expense of security or integrity. Devoteam has adapted this organisation to support customers with our expertise.

- **Strategy and design:** consulting on case-driven AI transformation and strategy
- **To build and transform:**
 - We are in strategic partnership with AWS, Google Cloud, Microsoft and ServiceNow alongside an ecosystem of emerging tech players.
 - Provide the Group with transversal expertise in data insight and business impact, creating customer specific digital products and experiences, data protection and cyber security and modernising IT strategies by leveraging on technologies and fostering business automation
 - Two central agencies to embed deeper knowledge in all our deliveries
 - AI Agency, a central hub for AI knowledge, expertise, assets, and offers
 - Sustainability Agency accelerate the sustainability transformation
- **To manage and run:**
 - Delivery network for cost-effective IT management and demand for required IT skills to improve customer impact

In 2026, we will accelerate our operational transformation by embedding AI across our consulting, delivery, and leadership operations, ensuring that we prioritise strategic opportunities and partnerships that align with our core AI ambitions.

Our unique approach, combining a strong ecosystem of partnerships and deep tech expertise, allowed the company to earn major recognitions from our partners, such as:

- Devoteam has been recognised as a ServiceNow Partner of the Year for the fourth consecutive year, specifically as the IT Partner of the Year in EMEA. Devoteam also won top awards for ServiceNow in 2025 for multiple categories, including Consulting



- and Implementation Partner of the Year (Elite – EMEA) and Customer Workflow Partner of the Year (EMEA).
- For the sixth consecutive year, Devoteam has won five Google Partner of the Year for 2025, recognising our expertise in Artificial Intelligence with Gemini for Google Workspace, Infrastructure Modernisation and Talent Development across EMEA, as well as country-specific achievements.
 - Devoteam has been awarded 'Microsoft Azure Expert MSP' and recognised with the 'AI Platform on Microsoft Azure Specialisation'.

- 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 the OCRE 2024 Framework. It underscores a strong capability in delivering cloud services to the research and education sectors.
- Snowflake Partner of the Year – Devoteam has also been awarded Snowflake Partner of the Year in France for 2025.

Devoteam guides organisations through the business and human change that responsible AI adoption demands.

AI has moved beyond consumer tools and into the core of business transformation, yet many organisations still struggle to extract sustained value from their investments. The challenge lies not in access to technology, but in how responsibly it is deployed. Real value and benefits come from purposeful, vertical AI solutions integrated within specific business contexts, supported by strong data foundations, transparent governance, and meaningful human oversight.

At Devoteam, we believe that ethical AI adoption begins with trust: in the systems, the data, and the people who use them. This means designing for accountability from the outset: limiting fragmentation, ensuring outputs are safe and compliant, and maintaining human control as automation increases. It also means recognising that technology moves faster than culture, and that supporting employees through this transition is as important as the solutions themselves. The organisations that lead will be those that treat AI not as a shortcut, but as a strategic capability developed with care, transparency, and a genuine commitment to responsible innovation.

We guide organisations through the business and human change that responsible AI adoption demands

Strategy, IT enablement & business empowerment

1	Strategic vision & roadmap Define AI ambition, align business priorities, and guide tech stack choice.	Strategy
2	Foundation & data readiness Establish robust infrastructure (cloud, compute, AIOps) and ensure governed, accessible AI data.	Infrastructure
3	AI solution development & deployment Prioritise use cases, implement AI agents, and streamline model lifecycle (ModelOps, CI/CD).	Delivery
4	People empowerment & adoption AI Literacy, Upskill teams, demystify AI, build trust, and drive user adoption.	People
5	Governance, ethics & compliance Establish responsible use frameworks and implement AI-specific security & compliance.	Trust & ethics

Client Case

A Ministry partner with Devoteam to lead the nation's workforce into the future with a People-first AI training

Case Study: Bridging Vision and Reality: Aligning Leadership for a National AI Transformation

Under Vision 2030, a Ministry of Human Resources and Social Development leads a "Human Capability Development Program". To transition from ambitious national targets to on-the-ground reality, the Ministry recognised that technical implementation could not precede strategic alignment. They required a unified vision at the executive level to bridge the gap between strategy and execution. The Ministry sought to equip its top leadership with a universal understanding of global AI trends, regional benchmarks, and strategic opportunities to determine exactly how to position and lead the country's AI agenda.

Solution: Devoteam partnered with The Ministry to deliver the National AI Enablement Program, focusing on aligning the Minister and top executives under one shared vision.

The AI Leadership Literacy Program, delivered by Devoteam, was a high-impact, 5-session strategic journey that provided a universal view of the AI landscape. This included deep dives into global trends, public sector use cases, and regional benchmarks (analysing strategies from North America, Europe, and Asia) to help leaders understand "what regions are famous for" and decide where and how the country should lead.

The Framework for Scale: while the immediate delivery focused on leadership, the partnership designed the strategic framework to scale this capability to the wider 1.5 million civil servants.

The Key Point: Devoteam prioritised "Step Zero": creating a culture of "Informed Decision-Making" at the very top before scaling to the masses. By clarifying the "Why" and "How" of AI through a global lens, the program successfully bridged the gap between abstract strategy and practical reality. It moved the conversation from "AI Literacy" to "Strategic Positioning," ensuring leaders were not just aware of AI, but aligned on how to use it to transform the organisation.

Benefits

Unified Strategic Vision: The Ministry's leadership is now aligned under a single, globally-informed AI strategy.

Defined Roadmap to Reality: A comprehensive framework was delivered to guide the future upskilling of the organisation, ensuring the workforce transition is planned, ethical, and focused on bringing all citizens on the journey.

Global Context: Leaders gained a critical understanding of global benchmarks, allowing them to make investment and policy decisions that leverage the country's unique competitive advantages in the global AI economy.

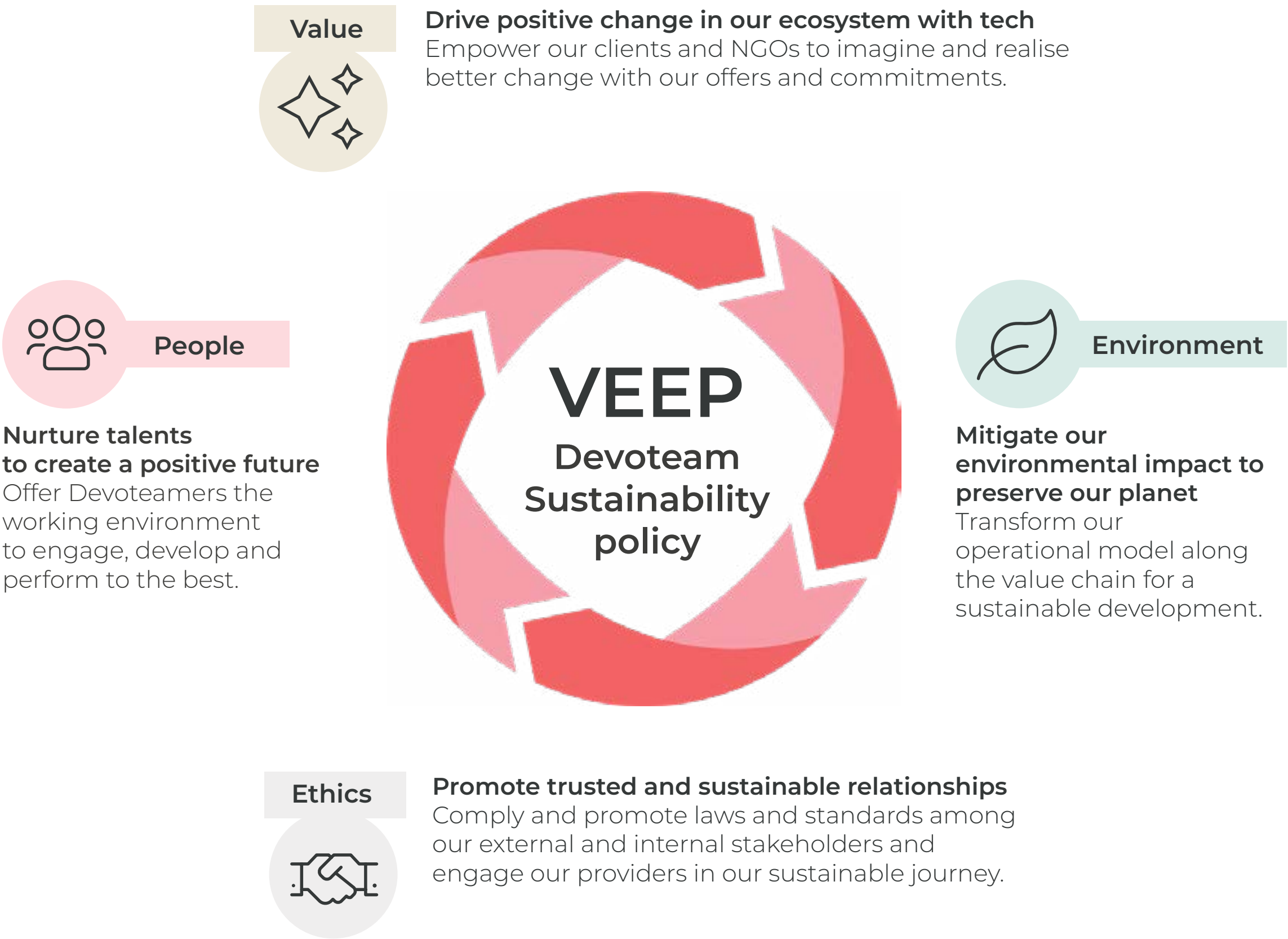


Our Sustainability policy and achievements

GRI 2-23, 2-24

Devoteam’s ESG (Environment, Social and Governance) strategy is based on four dimensions: **Value | Environment | Ethics | People**. This “VEEP” strategy drives our actions to improve our sustainability approach and mitigate risks.

Information about VEEP is available on our [website](#).



Related policies

Several policies related to our sustainability strategy will be mentioned in this report, including the following, which are applicable to all Devoteamers across all geographies. The policies and their effect are developed in the related chapter built around the ESRS.

Environment

Devoteam’s Environmental policy details our commitments and actions to preserve our planet, with a particular focus on climate change, biodiversity and circular economy. The policy’s structured approach to risk mitigation, performance tracking, and continuous improvement is aligned with ISO 14001 & 50001 certifications. It is completed with a business travel policy aiming to reduce CO2e emissions and a Sustainable IT Charter to reduce the use of raw materials linked to digital usage.

Social

Devoteam’s Human Rights Policy covers respectful employment practices, diversity and inclusion, health & safety, anti-slavery statement, our business practices and our whistleblowing alert system. Specifically, the policy is aligned with the following:

- ISO 47001 certifications
- **10 principles of the United Nations Global Compact**
- **United Nations Universal Declaration of Human Rights**
- **International Labour Organisation conventions**
- **OECD Guidelines for Multinational Enterprises**
- **General Data Protection Regulation (GDPR)**

Governance

Devoteam has several business conduct policies, that align with ISO 37001 and 27000-series certifications, described in ESRS G1, to ensure we drive respectful business relationships with all our stakeholders:

- Code of conduct
- Anti corruption charter
- Economic sanction policy
- Purchase policy - including a Supplier Code of Conduct
- IT charter

Our Quality policies align with ISO 9001 certifications and their effect are developed in the related chapters.

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 actions.



Ecovadis Sustainability Rating: 92/100 - 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: 963/1000 - Mature

Devoteam S.A.S was evaluated on the **Cybervadis** questionnaire, based on the ISO 27001 standard, and received the grade of 963/1000. This means we have reached the highest level of maturity and improved our score by 57 points in comparison to last year.



CDP, Carbon Disclosure Project: Score of C

Devoteam Group obtained a score of C in the areas of climate change and water security from the **Carbon Disclosure Project (CDP)**, a score that recognises the level of awareness 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** to reach net zero greenhouse gas emission accross the value chain by 2050.

Entity coverage

Increasing the number of entities ISO certified

- **ISO 9001 - Quality Management System:** Belgium, 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, Netherlands, 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)
- **ISO 22301 - Business Continuity Management Systems:** Lithuania

Other Local commitment and recognitions

- **Austria:** Kununu, Top employers
- **Denmark:** ISAE 3000 type 1
- **France:**
 - Planet Tech'Care
 - INR (Institut du Numérique Responsable)
 - Qualiopi
 - La Charte Relations fournisseurs et achats responsables (France and Be'Team entity)
 - Charte de la Diversité signed since 2007
 - Certification Gold "Tiers Responsable" by Provigis
 - Femmes@Numérique
 - CEFCYS
- **Spain:**
 - CMMI-DEV3
 - TISAX
- **Norway:** Miljøfyrtårn
- **Portugal:**
 - Crest
 - GNS
 - PCI
 - Bancontact
 - TISAX Level 3

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

Contribution to our most relevant United Nations Sustainable Development Goals (SDG)

GRI 2-23

	Programmes and commitments	References in the report
	Our Human Rights policy and commitment to offering our employees and suppliers a minimum living wage, in accordance with the local laws, regulations and standards of living. Devoteam Foundation	ESRS S1 Adequate wages Impact of IT Devoteam Foundation
	Our global and local Health and Safety policies stress our commitment to follow and improve the health and safety through local programmes and insurance. Devoteam Foundation	ESRS S1 Work-life balance and health and safety Impact of IT Devoteam Foundation
	Our learning programmes offer valuable learning opportunities for Devoteamers and open up possibilities to promotions and working on even more impactful missions. Devoteam Foundation	ESRS S1 Training and skills development Impact of IT Devoteam Foundation
	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	ESRS S1 Social Diversity, Equality and Inclusion Impact of IT Devoteam Foundation
	Our mission is to empower our clients to lead a dual digital and sustainable transformation, putting IT at the service of sustainable growth. Our Code of Conduct is to ensure the benefit of all stakeholders	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
	Our innovation and tech transformation programmes.	Impact of IT Our sustainability offers Devoteam Foundation
	Our sustainable purchasing strategy Our waste management strategy, especially for e-waste.	ESRS G2 Strategy, Business Model and Value chain ESRS E5 Resource use and circular economy
	Our Environmental policy, our carbon reduction targets and action plans.	ESRS E1 Climate change
	Our Code of Conduct promotes ethical behaviours along our value chain, including diversity and inclusion, anti-corruption, and environmental conservation. Our Whistleblowing/ethics alert system.	ESRS S4 Data protection of Consumers & end-users ESRS G1 Business conduct Cybersecurity Policies and Actions
	Our global partnership for sustainable development, including our partners, clients, and non-profit organisations.	Devoteam at a glance Our strategy Impact of IT Our sustainability offers Devoteam Foundation

Indirectly our actions also impact: SDG 10, Reduced Inequalities. SDG 11, Sustainable Cities and Communities. SDG 14, Life below Water. SDG 15, Life on Land

Our sustainability Statement



1. General Disclosures

This report is built using GRI protocol, UN Global Compact criteria and methodological requirements set forth in the CSRD and related standards, though it does not claim to be fully compliant with all of their provisions. Although the approach adopted is generally aligned with the expected principles of certain methodological inconsistencies or discrepancies may remain on specific points.

The preparations we did enabled clarity in our value chain, and deepened our understanding of Devoteam's impact, risks and opportunities.

A core component has been the Double Materiality Assessment (DMA), which identifies topics material to our business and value chain. We conducted our first structural and full assessment in 2024. While a full DMA is not mandatory every year, we have, this year, reassessed and reaffirmed the topics.

While Devoteam remains in the second group of companies, the Omnibus Directive has adjusted our mandatory reporting timeline by two years making us obliged to report according to CSRD in 2028 (covering 2027 data).

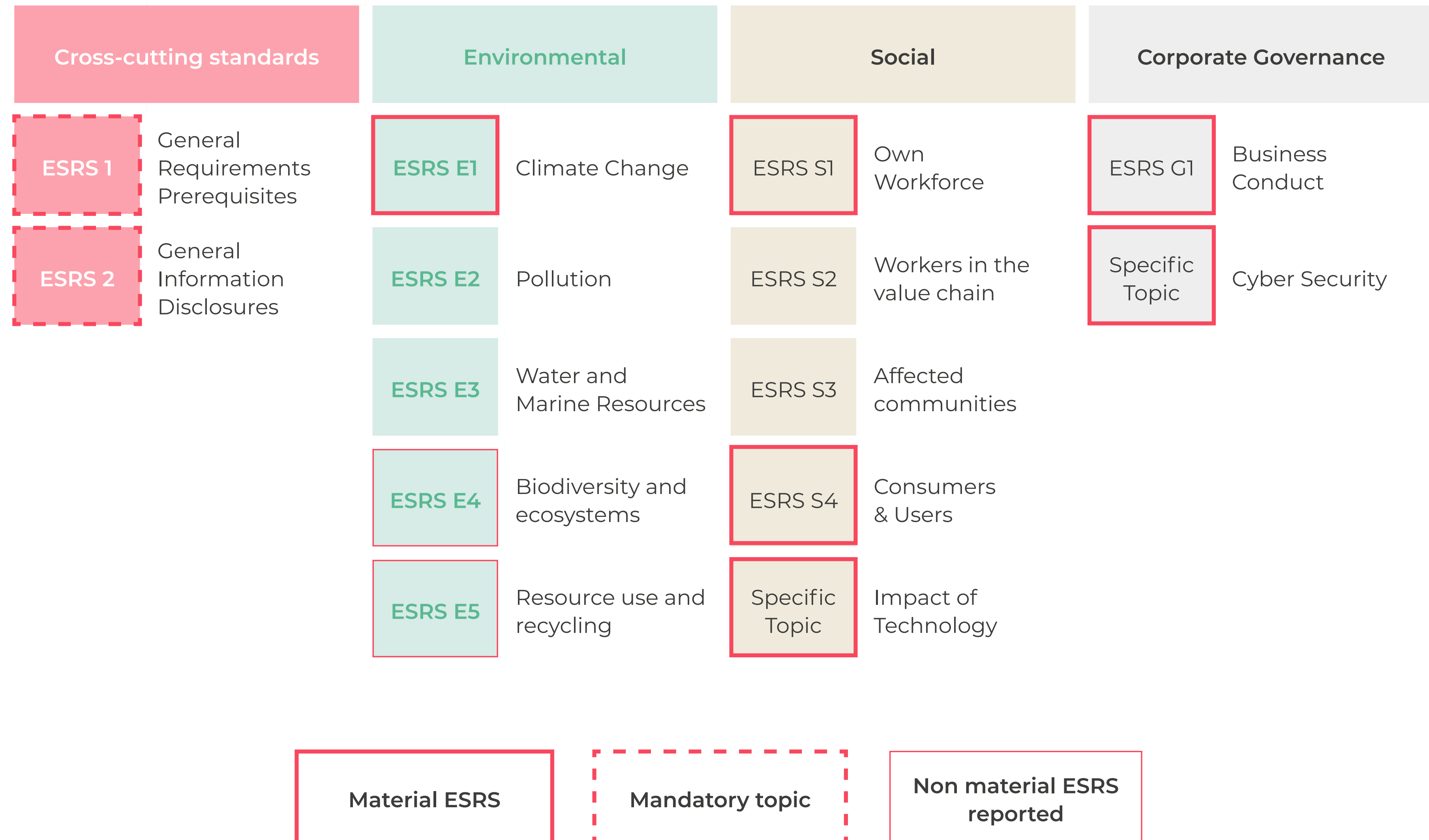
Collaboration across our international offices and departments—Finance, HR, IT, Legal, Marketing, and Operations—has been essential for refining data collection and aligning our global sustainability strategy.

Based on first internal exercise inspired by our double materiality assessment, and voluntary reporting, we report on the following ESRS that will be the structure of this reporting :

- General Disclosures
- Climate Change
- Own Workforce
- Consumers and End-services (with a focus on Data Privacy)
- Business Conduct (including Cybersecurity)
- Impact of Technology (Company-specific topic)

In 2026, we will evaluate our current reporting outputs against the EU's updated Omnibus requirements to ensure we align with the updated CSRD implementation standards and continue to mature the internal control processes.





Basis for preparation

GRI 2-2, 2-3, 2-4, 2-5

Perimeter

The sustainability statement for Devoteam covers Devoteam SAS and all subsidiaries over which Devoteam has operational control. We have excluded Enerhym GmbH and Collogia IT Services (acquired in September 2025) and StartX (acquired in December 2025) from this year's environmental and social metrics. As these entities are still being brought into our group-wide data systems, this ensures the highest level of data quality for our 2025 report; they will be fully included in the 2026 reporting cycle. The excluded entities represent approximately 1.1% of the Group's total headcount and do not materially alter the overall sustainability profile of the Group. A list of subsidiaries is available in the appendix of this report.

Throughout this report, "Devoteam" refers to our global standards and actions that apply to every collaborator in every geography. Where an initiative is local, we specify the country (e.g., Devoteam France). For reporting purposes, headquarters staff are counted within their respective countries unless noted. We also distinguish between our consultants and those in structural roles where it adds value; otherwise, you can assume all mentioned strategies and benefits apply to every Devoteamer.

The document also shows our business model and value chain, which is the basis for listing our identified IROs (Impacts Risks, Opportunities) 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 GRI 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 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 the Group Financial department, involving all local and corporate departments, especially CSR, Finance, IT, Facilities and HR and all geographies of the group.

For several indicators, including training, waste and electricity, definitions and calculation methodologies are currently in the process of being harmonised across the different national entities. As a result, certain data points may reflect varying levels of maturity or consistency, and further alignment efforts are ongoing to strengthen comparability and reliability over time

Estimations and outcome uncertainty

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

- Calculations based on square 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, 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...).

Our Inventory Management process is available on demand.

The main source of uncertainty lies in the manual collection of certain data or tools, involving a risk of human error. The verification of the data used for our carbon footprint and social report are done with consistency checks compared to previous years and to other countries, aims to reduce the uncertainty.

Some indicators as waste and training are also based on key estimates and declarations involving some uncertainty.

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

- Regular increased automation of reporting and data population,
- Discussions with the building owners of our offices and suppliers to get more accurate data.

Changes, errors and restatements

An error was identified in the 2024 CO₂ emissions data, related to the estimation of employee commuting and a modelling issue. Following a review with WeCount, the 2024 figure was recalculated, resulting in an increase of +1,380 tCO₂e compared to the initially reported data.

This correction does not affect 2025 country-level data but impacts year-on-year comparability. Based on the revised 2024 data, a decrease of approximately -1,600 tCO₂e is observed between 2024 and 2025.

Devoteam will provide a restatement of information if other 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

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) it also includes one observer that is a non-executive independent member. There is no representation of employees on the Board of Directors. The Board of Directors is responsible for the overall strategic management and proper organisation of Devoteam, ensuring long-term value creation. They meet quarterly and receive 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 monthly to manage the strategy of the Group and make major decisions, such as the Net-Zero Goal and the overall strategy to meet carbon reduction targets. They sponsor sustainability initiatives, approve the material impacts, risks and opportunities (IROs) and integrate them in the Group strategy and targets. The company's CSR topics are brought by Devoteam's Chief People Officer, to whom the CSR and Foundation Officer reports.

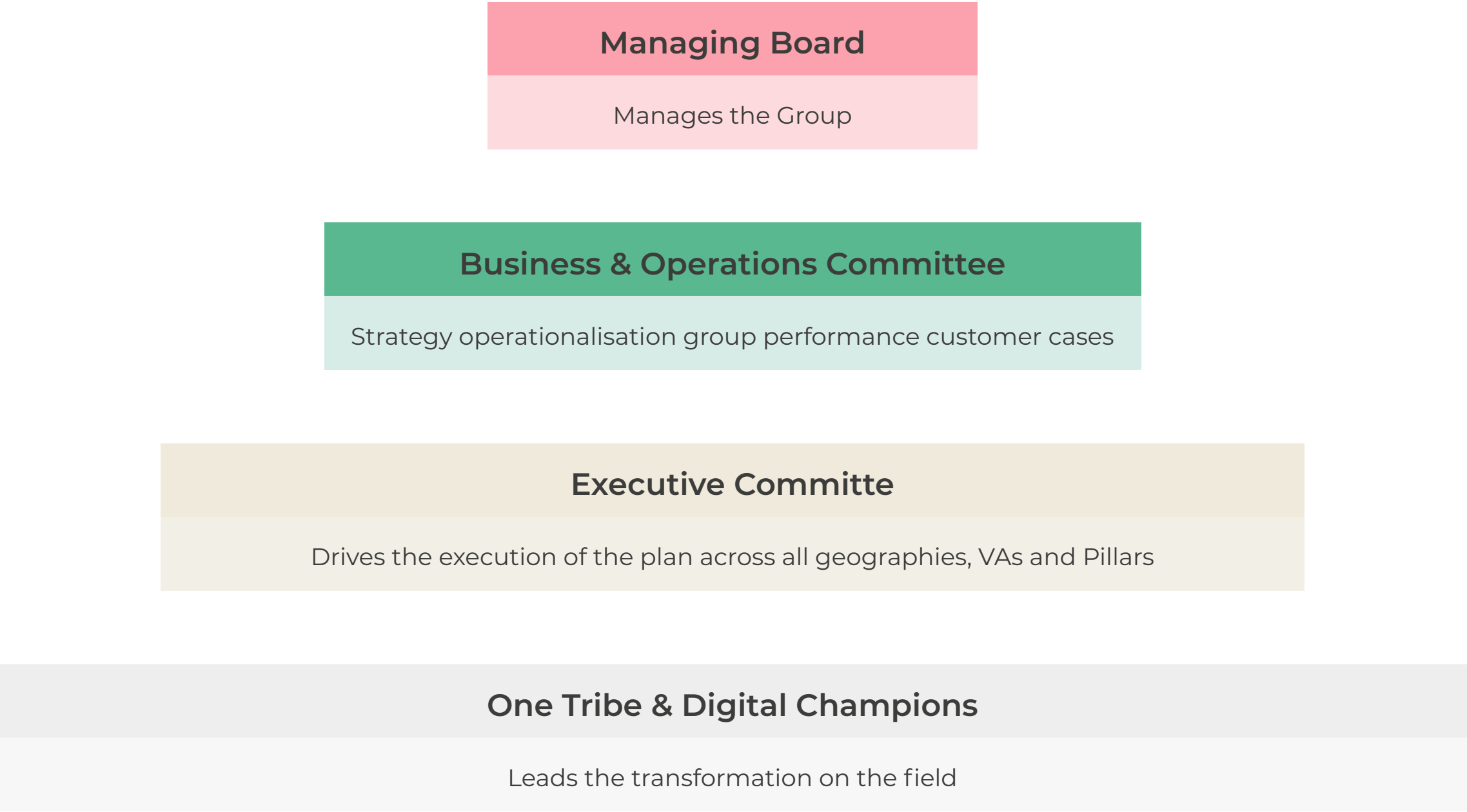
- **The Business and Operations Committee** consists of eight operational members (12,5% women). Led by the Group Managing Director, it includes the Group CFO, the deputy CFO, the MDs for our main geographies (France and North Africa, Middle East, Spain, Benelux and Serbia) and our main partner-based entities (Devoteam pillars) or offers: Google, Microsoft, Managed Services and Consulting. They meet on a fortnightly basis to operationalise the group strategy, ensure the Group's performance and lead business relations. 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 on action, including main sustainability metrics.
- **The Executive Committee** consists of the 26 top managers of the Group (13% women), including the Co-CEOs, the Managing Director, the structural Directors (Marketing, Finance, HR...) and Senior Vice Presidents or Managing Directors of our main entities and countries, ensuring matrix 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.
- **The Scale committee consists of Corporate Functions** and reports directly to the Managing Board. It is made up of the Group CTO, CIO, Nearshore and Managed Services, CSR, Talent and Learning, Marketing and External Communications, Finance, Controlling, Legal Counsel, Sales, M&A and the Chief of Staff (50% women). They meet twice per year to lead the Group departments and coordinate all the countries.

Name	Category	Company	Gender	Role
Stanislas de Bentzmann	Management	Devoteam	Male	Voting member
Godefroy de Bentzmann	Management	Devoteam	Male	Voting member
Jerome Nomme	KKR employee	KKR	Male	Voting member
Barbara Dalibard	Independent		Female	Voting member
Yves de Talhouet	Equity partner		Male	Observer
Simon Bouchard	KKR employee	KKR	Male	Voting member

- **One Tribe** is composed of around 300 top managers, business, and tech leaders of the group, with women representing 24.5%. They drive the transformation directly within our operations, embedding sustainability into our processes. The group meets quarterly by virtual meetings.
- **Digital champions** consists of 370 specialists spread across the countries, 9% of whom are women. They act as visionary leaders within their technical sectors, ensuring our service activities remain highly effective and as experts in their areas, they prioritise mentorship and knowledge sharing while leading high-level client engagements. The Digital Champions join the One Tribe members in the quarterly meeting to ensure strategic alignment.

2. Specific Sustainability committees

- **The Central CSR team** aligns the group's internal commitments, including double materiality and CSRD alignment, and coordinates activities and initiatives with CIM Community, Sustainability agency, other committees and local stakeholders. The team meets monthly and consists of the Group Chief People Officer, Group Chief Financial Officer, the CSR & Foundation Officer and Group Reporting Manager (100% women). The Central CSR team manages ESG data collection and reporting in collaboration with local CSR Managers, Finance, and Human Resources, while also partnering with Country Managers on CSR goals and achievements to drive the sustainability agenda including to reduce Co2 emissions.



- **Devoteam CSR International Community** consists of 35 local CSR managers (36% men) coordinated by the Central CSR team and meets monthly to deploy and monitor initiatives with a focus on improving Devoteam’s overall sustainable achievements. They work in full collaboration with all their local departments to explain, promote and advocate for sustainable initiatives and actions that translate the global sustainability strategy into the country’s local context and eco-system.
- **The CIM (Continuous Improvement Meeting) community** collaborates to manage sustainability, ethics and governance matters related to impact, risk and opportunities to operationalise actions and build resilience. The committee meets monthly and includes 12 individuals (58% women) from corporate functions, such as data protection, cybersecurity, compliance, purchase and some country representatives.
- **The Devoteam Sustainability Agency** is an international task force that accelerates Devoteam’s positive impact by supporting clients in building solutions that support the UN Sustainable Development Goals. The Agency works by sharing internal knowledge and experience on ESG solutions and the decarbonisation of AI and digital infrastructure. The aim is to provide clients with technology to support both "Sustainability in AI/IT" (i.e. how to reduce the environmental footprint of AI/IT) and "Sustainability by AI/IT" (i.e. build solutions that accelerate the sustainability transformation). The core team orchestrates the global sustainability client offerings, frameworks and upskilling guidelines, while an internal, broader community with members from various countries and business units help deploy these services locally.

The Chief Executive Officers communicate sustainability initiatives and strategies to Devoteam employees. They are also encouraged to drive their own sustainable initiatives locally, either with their colleagues, through Devoteam Foundation or privately. By local governance, the global sustainability strategy is translated into concrete local actions. In each country, the CSR manager reports to the Country Manager on CSR goals and achievements, and works across borders in community groups to drive the sustainability agenda.

1.1.2 Integration of sustainability-related performance in incentive schemes
GRI 2-18

Devoteam does not have an incentive scheme for Executive Management where there is remuneration linked to sustainability matters.

1.1.3 Statement on Due diligence

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	Actions and resources in relation to climate change policies [E1-3] Actions related to Biodiversity and ecosystems [E4-3] Actions and resources related to source use and circular economy [E5-2] Actions related to work-life balance, 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

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.

Devoteam's governance structure ensures that sustainability is integrated into all levels of the organisation, 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. Professionals involved are the CIM, Scale committee, and experts for IROs definition and management, the executive committee for IROs approval and the 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 the corporate level and broken down into the operational schemes in all entities (for example ISO certifications).

The main risks identified are described in the Double Materiality assessment process 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 standardisation in the future.

1.2 Strategy and business model

GRI 2-1, 2-6

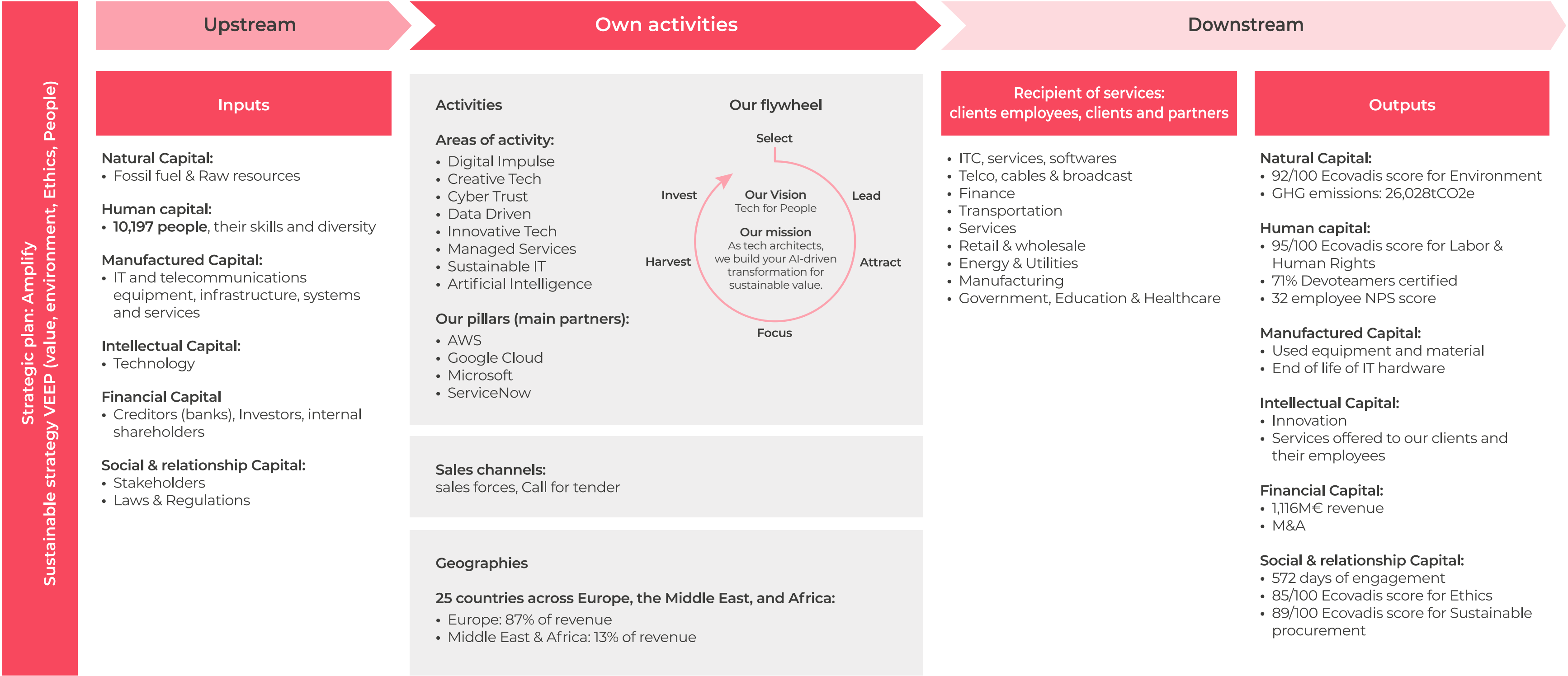
1.2.1 Strategy, business model and value chain

Our business model and value chain assessment are performed using the Six Capitals framework, reflecting a commitment to sustainable performance and technological leadership. Devoteam is a pure IT service provider, not owning or operating any data centres, and is not active in fossil fuels nor generates any revenue from this sector. Operating in 25 countries across Europe, the Middle East, and Africa—with Europe accounting for 87% of our €1,116M revenue in 2025—our most significant impacts, risks, and opportunities (IROs) arise from our internal operations and our 10,197 employees (as of 31.12.2025).

Our growth is driven by a continuous 6-step flywheel that serves as the core of our sustainable business model:

- Select the most innovative technologies from the leading tech partners
- Lead by hiring and retaining the best tech and business leaders, creating offers and 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 and margin thanks to our tech partner focus, combined with a disciplined eagle model
- Invest in tech partners through initiatives, speedboats and targeted acquisitions

Our vision is to develop new AI-based offers with our strategic partners, and this aligns with our AMPLIFY strategy, initiated in 2024, which builds the



1.2.2 Interests and views of stakeholders

GRI 2-29

Our stakeholders are diverse, encompassing current and future talent, clients, strategic tech partners, non-profit organisations, the broader ecosystem of regulators and civil society. We prioritise engagement through a structured dialogue—including regular feedback, reviews, and bargaining—to ensure we remain aligned with their expectations and to integrate gained insights into our strategy.

By facilitating two-way communication, these stakeholders also played a central role in our Double Materiality Assessment, where their perspectives helped calibrate our material impacts, risks, and opportunities.

Stakeholders	Why we engage / What they care about	How we engage	Value created
Employees, subcontractors and candidates	• Skills development • Career development • The well-being of our employees and subcontractors • Engagement with the company and its values • Increase inclusion and diversity in the Tech sector	• Regular check-ins and performance reviews for all employees • Engagement, events and programmes - as “Ask me anything” live session with Managing Board • Devomood: Devoteam’s internal engagement survey • Workers' Representatives (social committees) • Compliance and Standards: Our Code of Conduct and 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 subcontractor well-being, inclusion and safe work environments • Increasing talent pool in the tech sector • Meeting client needs for project completion with skills and a flexible, scalable workforce
Clients	• Leveraging tech to achieve their business demands and 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 the 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 and Margin development • Transparency • Compliance and ESG as drivers of value.	• Monthly Board of Directors • Regular exchanges between specific teams (ESG, Finance, Data protection, etc.) • Monthly, quarterly, and annual surveys	• Ensuring transparent information • Increasing value delivered and 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 organisations 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

GRI 2-25, 3-2, 3-3

Our identified material topics are based on a preliminary internal exercise inspired by a double materiality assessment. It is not intended to represent a final or exhaustive identification of impacts, risks and opportunities. This analysis will be further refined through a comprehensive double materiality assessment, subject to external audit and validation. Material IROs are described under each topic reported on in the sustainability statements, including the timeline and value chain position.

Our main risks and opportunities are related to our daily work, which affects our clients, employees, and systems. As they are part of our regular operations, we can closely manage them. These topics include keeping up with new technology skills, staying ethical, and protecting data through strong cybersecurity. 100% of Devoteam sites have been considered in the internal audit and assessment, and interviews ave been conducted with relevant stakeholders on all the ESG topics. As Devoteam has had solid plans to handle these areas in place for a long time, any potential financial risk is kept low.

When it comes to the environment and carbon emission, we recognise the topic is important globally and believe our work will lead to a positive result. We also see great value in training our people, promoting diversity, and using technology in a responsible way. Most of these positive actions are not just good for society; they are also great business opportunities for the company.

Food waste and the fight against food insecurity are not significant in relation to the company's activities and are not mentioned in this report, even if Devoteam takes corrective action to reduce its impact, like working with catering providers to limit waste. Respect for animal welfare has also been assessed as not material. Concerning the French law of 1 August 2023 relating to military programming for the years 2024 to 2030, 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
	Positive impact	Impact of environmental criteria on Devoteam's supply chain
Employee Conditions, Health, Safety and Wellbeing. Human rights. ESRS S1	Risk	Scissor effect
	Opportunity	Developing ESG policies and improving HR practices
	Opportunity	Skill-based hiring: unlocking innovation and diversity
Equality, Diversity, Inclusion ESRS S1	Opportunity	Promoting a diverse, inclusive, and supportive workplace culture
	Positive impact	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	Positive impact	GDPR training for value chain data protection
	Opportunity	Strong internal data protection and security processes
	Opportunity	AI development on the need for data protection
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	Bad ethical and security AI practices
Cybersecurity Entity specific topic	Positive impact	Cybersecurity training for value Chain security
	Risk	Unprotected employees devices
	Risk	Unprotected consultants' devices used for client mission
	Risk	Unmanaged BYOD

1.3 Double materiality assessment process

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

The double materiality assessment process presented in this section reflects a preliminary internal exercise conducted in anticipation of CSRD requirements. As such, it does not constitute a final or exhaustive assessment and will be further refined through a comprehensive double materiality analysis subject to external audit and validation.

1.3.1 IROs identification, scoring and assessment

Devoteam performed its first double materiality assessment in 2024, following a structured process to ensure the company met all CSRD requirements while supporting its main business goals. The assessment was done in four main steps.

1. Value Chain Mapping: Reviewing the entire value chain, including upstream and downstream business relationships, to identify the most relevant ESG topics for the business.
2. IRO Identification: Defining the specific Impacts, Risks, and Opportunities (IROs) related to which were then divided into topics, sub-topics and sub-sub topics as defined in the ESRS AR16. In this process, we also identified additional sector and entity-specific topics that are relevant to Devoteam and its value chain.
3. Materiality Assessment: Evaluating the significance of these IROs to the business by identifying resources and key internal and public documents relating to Devoteam's ESG strategy, including Devoteam's risk register. The list was then assessed

by interviews with experts on the subject, such as external stakeholders and internal peers. To finalise, the core team reviewed the full list to ensure alignment with the topics assessment.

IROs identification

The first list of relevant IROs was defined with a Group perspective. This identification was done through a literature review and review of Devoteam's risk register of about 20 internal and external documents, notably from former Devoteam risk assessments, partners like Google Cloud, peers, Cigref, ERM, and more. Together, they all 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. With this list, the core team did an analysis of the Group's value chains and their underlying dependencies.

To refine the findings, interviews were conducted with a diverse array of in-house experts, such as CSR ambassadors, specialists in HR, internal control, compliance, and legal, as well as professionals from IT, cybersecurity, data protection, sales, and communications. The list was then reviewed by interviews with external stakeholders representing partners, suppliers and clients to cover the entire value chain.

The process covered all Devoteam activities, including specific entities such as Be'Team, which is specialised in subcontractor management. The initial preparation and iterative review of the long list of IROs involved over 15 interviews and workshops with about 30 people. The process followed was the same, whatever the standard considered.

In 2025, we performed an internal review of our material impacts, risks, and opportunities to ensure

their ongoing relevance in relation to any changes in our business operations or the external context.

IROs Scoring

The IROs were assessed using the materiality thresholds already defined by Devoteam and used in particular by the Risk and Finance Department. Devoteam has, for several years, integrated ESG into its processes and strategy, enabling the Group to feed its double materiality analysis with a significant number of existing documents. IROs were rated qualitatively on the basis of:

- severity and probability (respectively for impacts)
- magnitude (financial consequence) and
- probability (respectively for risks and opportunities).

Internal thematic experts contributed to the rating, and material IROs are those that exceed the materiality threshold when the qualitative ratings are summed.

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, independently of the measures put in place by the organisation 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 accounts for the expenses incurred to reduce the severity of the negative impact.



In the case of rating in the context of CSRD, the following levels were taken into account:

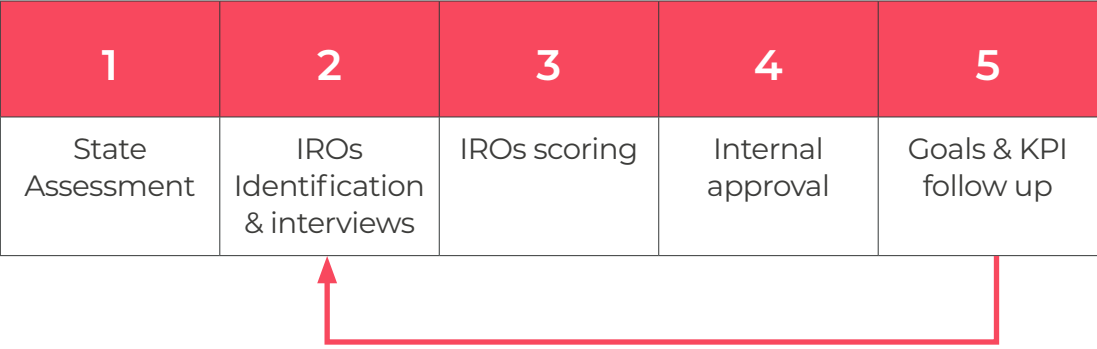
- For potential impacts, risks and opportunities: gross rating, without taking into account mitigation or compensation actions.
- For actual impacts: net rating. Thus, control measures implemented by the Group to reduce the severity of certain impacts can only be taken into account for impacts that have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



1.3.2 List of disclosure requirements met

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

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

2. Environmental Information

2.1 Climate change

Material impacts, risks and opportunities and their interaction with strategy and business model

As an IT company and data centre user, Devoteam’s impact on climate change primarily comes indirectly through activities (negative material impact), and mitigating actions (positive impact) along the value chain primarily include travelling less, reducing our office space and energy use, and also helping customers reduce their negative impact.

There has been no transition risk identified in the near term, but the risk related to clients expectations could rise in the future. Resilience analysis was performed in 36% of our sites together (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	
Impact of environmental criteria on Devoteam's supply chain The impact of Devoteam's supply choices and criteria leading to driving Supply chain improvement (Maturity, possibilities, measures, systematic change) resulting in global momentum on GHG reduction.	Positive impact	X				X	

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 Double Materiality assessment. By implementing ISO 14001 principles and, in some cases, achieving certification, more and more countries are supplementing environmental analysis at a local level. 52.4% of our employees were in 2025 covered by an ISO 14001-certified environmental management system.

36% of our buildings are also audited on environmental risks. (and 100% for Devoteam SAS)

2.1.1 Policies related to climate change mitigation and adaptation

Devoteam is committed to collective, strong long-term action to address the environmental crisis, focusing on climate change and biosphere integrity that supports the 2015 Paris Agreement limiting warming to 1.5°C. In our Environmental policy, applicable in all Devoteam geographies across the group, we pledge to innovate, collaborate, promote and work against climate change, ensuring a sustainable future for all. We will lead by example, extending our positive impact to our clients and the wider digital sector. This requires avoiding emissions, restoring ecosystems, and innovating low-carbon solutions.

Guiding Principles:

- 1. **Transparency:** We communicate our progress yearly, maintaining open and honest reporting.

- 2. **Prioritisation of Reduction:** We reduce our carbon footprint through continuous improvement and targeted actions to align with a +1.5°C scenario and our science-based targets.
- 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 all our employees are invited and encouraged training in environmental topics.

2.1.2 Actions

Transition plan for climate change mitigation

Devoteam’s overall short and long-term goals were officially approved by the Science-based Target initiative (SBTi) in 2024, and then cascaded down to individual countries with a formal commitment from each country manager. During 2025, countries have started creating individual roadmaps tailored to their previous emissions, local situation, and specific abilities to ensure these goals are met with a focus on Scope 1 and 2 emissions, such as company car policies and office energy consumption. This approach is to ensure that actions are realistic while still achieving our collective common goals.

Our plan for 2026 is to continue developing these country roadmaps, consistently monitor and update progress across all three scopes, and enhance data collection for strategic decision-making. Over the coming years, we will also work towards developing a climate transition plan in alignment with CSRD requirements and other applicable standards.

Actions and resources in relation to climate change policies
GRI 102-4

Travel Management

Business Travels

While we welcome digital tools to reduce our footprint, we acknowledge that meeting in person is sometimes essential. To balance these needs, our Group Business Travel Policy (launched in 2023) is based on three core principles so travel is done purposefully—prioritising low-carbon alternatives and avoiding unnecessary trips:

- **Reducing Travel:** We favour video conferencing, limit internal conferences and non-EMEA travel, and optimise trips by scheduling multiple meetings in one journey.
- **Choosing Sustainable Options:** We encourage environmentally friendly travel options (train or car sharing when possible) and choose an EV when a car is needed. We also encourage and incentivise sustainable commuting solutions like biking, walking, and using public transportation. For example, Sweden has office bikes available for employees to use, and Lithuania covers the cost of train tickets for employees who need to commute between the Vilnius and Kaunas offices.
- **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, Luxembourg arranged a Carpooling Day to tackle the challenge of carpooling and how it could be developed further.

Company cars

Starting in 2024, we have during 2025 continued to modernise and scale down our corporate fleet and we will remain committed to this trajectory in the years ahead. While some countries have already phased out company cars entirely, others—such as France—are executing structured transition plans to end contracts and move away from their traditional fleet models.

Austria, Belgium, Germany, and the Netherlands continue their commitment and transition plan, replacing retiring internal combustion vehicles exclusively with electric models at the end of each lease period. Portugal banned new diesel rental contracts in 2024 and is offering office-based EV charging infrastructure.

Commuting

Post-covid, and returning more often to the office, commuting has the last years increased. We prioritise office locations in city centres and near major public transportation hubs to make sustainable commuting the easiest choice for our people. For example, all our main offices in Paris, France, are close to Paris metro stations.

We actively also incentivise greener travel habits across our global locations through tailored local initiatives. One example is in Austria, which encourages the use of railways and urban transit by providing employees with "Klima-Tickets" (Climate Tickets), granting them annual access to the entire national public transport network for daily commute, and travel to customer sites as well as for

private use. Many countries are also encouraging employees to walk, bike or use public transport, for example, in Indonesia and Spain. During 2025, Luxembourg arranged an Eco-Mobility Day, inviting everyone to get to the office in a more sustainable way than using a car.

Purchase of services (GRI 308-1)

Regarding the purchase of services, our actions are focused on two key areas:

- Reducing emissions by integrating sustainability criteria into our procurement process
- Improving emissions tracking related to our purchases

Even if our emissions related to the purchase of services have decreased over the last few years, they are still a critical part of our total carbon footprint. We continue the sustainability assessments for current and potential providers that we started in 2024, and in 2026, we plan to organise webinars for suppliers with the lowest scores in order to train them on how to calculate their carbon footprint. Our Supplier Code of Conduct instructs all partners to align with our approved SBTi science-based targets to limit global warming to 1.5 degrees and prioritise the repair, reuse, and recycling of electrical waste (WEEE) to extend asset lifespans.

Devoteam France has implemented a "No Goodies" charter, and our marketing teams have formalised group-wide guidelines to ensure responsible event management and a reduction in promotional items. For catering, we prioritise local and seasonal, with a strong preference for vegetarian and vegan options, as demonstrated by our ØreDev conference, which has served an exclusively vegetarian menu for several years. Furthermore, through the Devoteam Foundation, we impact by supporting organisations such as Frigo Loco and Alnarp's Agroecology Farm.

Our Code of Conduct for Suppliers is described in G1-2.

Our sustainable purchase policy is described in G1-2.

IT Equipment and Digital services

As an IT consultant company, IT equipment is an area of focus and we are committed to our work in decreasing the environmental footprint in collaboration with our IT partners. Here are some key focuses:

- **Raising Devoteamer Awareness**, to reduce our own footprint, and influence broader change Sustainability in AI/IT and Sustainability by AI/IT are part of our customer offerings. We regularly conduct "Sustainable IT Tips" campaigns to encourage less-emitting behaviours related to email usage, storage, and presentations, and countries make campaigns on digital sobriety. For example, Luxembourg did a digital clean-up day to raise awareness on data storage and invited all employees to clean their devices with simple practices and tips. Our IT portal shows a carbon footprint view for 100% of our IT assets, so employees in France can see the CO2e emissions associated with new devices, not just the cost, and propose eco-labeled (TCO) certified devices. During the Sustainability Months in October 2025, Devoteam's new Sustainability IT charter was published and communicated to all employees.
- **Focusing on the IT Department** to embed sustainability into all internal operations, starting with the purchasing process. In 2025, we provided a new charter for IT Managers with common guidelines and a lifecycle for equipment, SaaS and software. IT managers are also regularly updated during the different meetings on CSR activities, and on actions we're expecting from them.

- **Improving Calculation Methods to increase our carbon footprint accuracy:** Using more physical data and getting more and more data from our providers. For instance, regarding the French scope, we got accurate data for 100% of hardware vs 90% in 2024. Regarding the Corporate team's hardware emissions, 100% of them were populated with providers or market-accurate data. It is still more complicated for software and SaaS: 50% of accurate data for the corporate team (vs 38% in 2024), which covers over 90% of our licences and usage. Such improvement makes it possible to lead further discussions on improvement plans with our main providers.

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

During the past few years, Devoteam has adapted to working models combining time spent at client sites, onsite at the office and hybrid arrangements to better align with our evolving modern work styles. This has resulted in many of our offices having been downsized, prioritising locations that are both environmentally friendly and easily accessible via public transportation. For example, in 2025, Devoteam Portugal moved two offices in Porto together so that employees are now in the same building, and last year, the office in Malmö, Sweden, relocated and downsized with potential energy savings. In 2024, our headquarters in Levallois-Perret (113 rue

Anatole France) reopened after complete renovation, featuring a range of sustainable elements, such as a vegetable garden, rainwater reuse systems, enhanced insulation, and electric charging stations.

Devoteam Germany's buildings are ISO 50001 certified, and the Lithuanian team chose an ISO 50001 certified office using electricity from renewable energy sources. Also, Devoteam France uses 100% electricity when Devoteam controls the contract. In 2026, the Netherlands, Luxembourg and Portugal co-located with all other entities within the country. Devoteam Belgium is in a highly sustainable building, incorporating advanced technologies to minimise energy consumption, including Belgium's first commercial application of geothermal energy. Many countries, for example, in Spain and France, are also optimising existing infrastructure by upgrading to energy-efficient appliances and implementing energy-saving measures like LED lighting.

People awareness, education and engagement

Devoteam fosters a culture of sustainability and climate change awareness through diverse initiative where 100% of the employees are invited most notably the annual Earth Week celebration in April and Sustainable Development Month in October, where activities are carried out, both local and global, during a set period to optimise impact and create a sense of togetherness. Devoteam seized these two occasions to host a series of events. This included a Digital Clean Up Day workshop to raise awareness about data storage and provide practical device-cleaning tips, an Anti-waste Creative Afterwork for employees and their families, and a collaboration with IMS (Inspiring More Sustainability), where high school students were invited to develop innovative carpooling solutions for the company.

Devoteam UK did a series of newsletters illustrating and educating about the United Nations 17 Sustainable Development Goals. During Sustainable Development Month there was also a weekly quiz for all employees to participate and answer questions about Devoteam's sustainability work. These events brought together nearly 1,000 employees (almost 10% of the workforce) throughout the year.

Devoteam's other global activities focused on sharing critical insights regarding energy consumption in buildings by mailing and sharing good best practices and AI's impact on the transition to green electricity. For example, during the year, Devoteam collaborated with The Shift Project's special program dedicated to exploring this specific intersection of technology and sustainability, with the aim of empowering consultants to integrate these insights directly into their professional work.

2tonnes training

The 2Tonnes training is an educational and collaborative initiative based on Kate Raworth's Doughnut Economics theory, designed to raise awareness and drive concrete action against climate change. Its main goal is to translate global climate commitments into personal actions. During the workshop, participants work together to create a practical carbon reduction plan that balances individual lifestyle choices with collective systemic actions and includes discussions on the wider environmental and social challenges. In 2025, Devoteam Lithuania conducted these training sessions for its staff, including one session organised specifically for the management team to focus on the leadership's role in the transition.

Upskilling on Sustainable IT (GRI 103-5)

Acknowledging the climate change and the substantial environmental impact of digital solutions, alongside the importance of fostering inclusive, ethical values within our digital operations, we introduced in 2023 a global Sustainable IT training program with different modules. This is designed to empower every Devoteamer with the expertise to operate sustainably in their daily roles and embed sustainability across all client engagements.

- Level 1 utilises 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 2025, 4,507 employees worldwide had completed Level 1, which implies that more than 44% of the workforce has been trained through the year to this specific environmental challenge which is Sustainable IT.
- Level 2 offers the Green Software for Practitioners - LFC131 certification from the Linux Foundation. This course is more specialised, focusing on training software practitioners in green software principles, including ecological considerations, standardised terminology, and applying these principles to software design and development.

All together, Level 1, Level 2, and, also ITIL 4 Sustainability certifications, represent our reported Sustainability upskilling program. We have also included specific sustainability modules in AI training for all Devoteamers to ensure the development of such tech is aligned with our commitments. Our objective is to embed sustainable IT in all our activities and technologies.

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 RGESN, Ethical Designers, Green IT, and GR491. Over 69% of the French design tribe were trained in 2025, and we aim to expand this training.



Supporting nonprofit organizations working against Climate change

Club des Entreprises Éco-responsables 2025

Club des Entreprises Éco-responsables is a local network in Levallois-Perret that facilitates cooperation between diverse businesses to share best practices in environmental and social responsibility. They aim to address the need for collective solutions to local environmental challenges, such as waste management, energy efficiency, and sustainable transportation. Its goal is to bridge the gap between individual corporate policies and a unified local approach to sustainability. Devoteam France acts as an active member by hosting the club's gatherings at our Levallois-Perret offices and contributing expertise with a regular speaker. We also share insights on the environmental footprint of digital technologies and the role of "frugal AI" in the ecological transition. By engaging in this initiative, Devoteam France contributes to and supports the development of a local sustainability ecosystem. An approach which is essential for achieving meaningful progress in sustainability.

2.1.2.1 Targets related to climate change mitigation GRI 102-4

Science Based Targets initiative (SBTi) officially validated that Devoteam’s greenhouse gas emissions reduction targets align with the SBTi Corporate Net Zero Standard, in August 2024.

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

During the checks of the 2025 CO2 figures, a mistake was discovered in the calculation of commuting emissions in 2024. The table therefore shows both the figure presented in the 2024 Sustainability Report and the revised figure.

Scope	Base year (2022)	2023	2024	2024 revised	2025 (evolution vs base year)	2028 target
Scope 1 + 2 (market-based approach) tCO2e	3,984.74	4,734	4,609	4,447	4,014 (+0,7%)	2,685.86
Scope 3 tCO2e per M€ of operating margin	306.48	212.35	186.43	196,0	191,0 (-36,2%)	171.5

Presentation of the Co2 emission 2024 and 2025 with commuting excluded.

	2024 (revised figure)	2025
Scope 1	3,227	2,738
Scope 2	1,220	1,276
Scope 3, excl commuting	19,126	16,880

Commuting is calculated via an internal survey with an approximate response rate of 30% and extrapolated to total headcount for each county. Increase reflects higher frequency of office attendance.

Footprint realised with **WeCount** under the Greenhouse gas (GHG) protocol and our annual results are communicated to all our stakeholders, including our employees, through a variety of channels (in addition to this public report). The methodology is described in the Appendix.

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

2.1.2.2 Metrics related to climate change

Energy consumption and mix GRI 103-2, 103-4, 103-5

Energy usage for offices (1) Net emissions (market-based) 1,105.66 tCO2e (4.2% of total group emissions) -18,6% vs 2024 3.82 m2 per FTE (-12% vs 2024)	
Total Electricity consumption Group: 2,884.5 MWh(2)	Renewable electricity Group: 1,100.32 MWh(2) 38.1% 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 the source of energy.
(3) When Devoteam controls the contract

Gross Scopes 1, 2, 3 and Total GHG emissions

Our 2025 Carbon footprint
(GRI 102-5, 102-6, 102-7,102-8)

Total: 26,028 tCO2e market-based	Scope 1: 2,737.76 tCO2e
2.55 tCO2e/HC	Scope 2:
0.0197 tCO2/K€ revenue	Market-based: 1,276.31 tCO2e
-399.5 tCO2e excluded (purchase of offset computers & recycling of waste)	Location-based: 1,332.51 tCO2e
	Scope 3: 22,013.94 tCO2e
	Upstream: 22,013.94 tCO2e
	Downstream: 0 tCO2e

The reported figures are based on a combination of measured, estimated and self-reported data. Certain inputs, such as landlord-reported data or estimates related to waste emissions, may involve inherent uncertainties.

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

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 running some planting programmes (cf ESRS E4). We are also buying some hardware that is already compensated (cf ESRS E5).

Internal Carbon pricing

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

A Strategic Digital Roadmap to Strengthen Teragir’s environmental education programs

Teragir is a non-profit organisation in France that leads essential environmental education programs, such as Éco-École and Jeunes Reporters pour l'Environnement. As Teragir has grown, its digital tools have become fragmented across different technologies and providers. This created "digital silos" where information was scattered across different systems, making it difficult to have a unified view of their community.

To help them scale their impact and secure their long-term operations, the Devoteam Foundation conducted a comprehensive digital audit of their platforms analysing Teragir’s digital ecosystem to identify key areas for improvement. The audit provided Teragir with a roadmap to modernise its aging systems and streamline their digital tools to reduce administrative tasks and refocus resources on environmental education.

2.2 Biodiversity

2.2.1 Policies related to Biodiversity and ecosystems

During Devoteam’s Double Materiality assessment, no material IRO concerning biodiversity and ecosystems was identified in relation to our activities and locations. However, the Group voluntarily wants to contribute to addressing biodiversity restoration and protection in collaboration with Partners.

2.2.2 Actions related to Biodiversity and ecosystems

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

- **Noe:**
Noé is a French non-profit organisation dedicated to protecting and restoring biodiversity through the conservation of endangered species, habitat management, and the promotion of nature-friendly economic practices. Within the association, they run a project called Lépinoc, a French citizen science program to gather data about moths, monitor their populations, and sensitise participants, as they are unknown and understudied species, but key pollinators essential for ecosystems. To study moths, the project collects photos taken by volunteers in a framed protocol; however, the association lacked a scalable way to store, process and analyse the data from these collected pictures. To address this challenge, the Devoteam Foundation defined the technical roadmap by

outlining the architecture for the data collection system, identifying key technical hurdles, and conducting initial tests of AI models. The use of AI techniques fostered collaboration between Noe’s team and AI researchers in Europe, strengthening their scientific legitimacy and aura. This mission laid the groundwork for large-scale data collection and higher data quality, significantly strengthening Noé’s understanding of moth populations to support their long-term conservation efforts.

2. Planting trees:

- **Reforest’Action (Group):**
In 2018, Devoteam began supporting Reforest’Action in their work to preserve, restore, and create forests worldwide to address the climate emergency and the erosion of biodiversity. By the end of 2025, Devoteam had supported the funding of 10,700+ trees for 14 reforestation projects, of which 1481 trees 2025, in Haiti, Indonesia, Portugal, Madagascar, Malawi, Morocco, Peru, France, Spain, and South Africa. This material positive impact is a way to engage Devoteamers in biodiversity.
- **WaldFreunde:**
At Devoteam Germany, a team of 30 people and their families joined forces and planted 500 two-year-old seedlings just outside Frankfurt to help restore damaged forests and protect nature so the environment continues to stay healthy. The event also helped foster a new generation, giving children a hands-on role in protecting the planet and building a lasting bond with the outdoors.

- **Ecologi:**
Procori, which is part of Devoteam Sweden, 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 contributed to 32 projects, planting over 44,200 trees while mitigating almost 1,800 tonnes of CO₂e. All being certified by either the Gold Standard or Verra’s Verified Carbon Standard (VCS).

2.3 Resource use and circular economy

2.3.1 Resource use and circular economy IROs

As a service company, not owning any data centres, Devoteam identified no material IRO concerning resources and circular economy during the Double Materiality Assessment, considering our size, activities and locations. Devoteam uses few resources; however, we acknowledge our activities are generating e-waste: computers, phones, tablets, screens, TVs, video conference devices, network equipment, and printers. This concern could turn material in the future. Consequently, we want to disclose voluntarily on waste, especially e-waste.

2.3.2 Policies related to resource use and circular economy and circular economy

Although Devoteam activity is not generating massive waste, the Group commits to limiting

its impact and encourages recycling in all the countries. One of the main goals is to optimise our utilisation, repair when needed and cut down on e-waste. At our end-of-use, we target 90% of our tech devices to be reused, donated or recycled. During 2025, we have introduced a new Sustainable IT Charter for IT Managers and IT Teams to establish an extended operational lifespan for devices—such as a minimum of four years for laptops—and ensure that 100% of our electronic waste is managed by certified partners.

To obtain this, we work with local partners to manage the end of life of our assets and, when possible, we combine our efforts to recycle with other social actions. For instance, Devoteam France partnered with two disability friendly companies, both employing mainly people with disabilities, or in a situation of professional reintegration.

- ATF Gaia is an organisation that fosters professional inclusion by employing people with disabilities to provide secure data erasure and refurbishment services across the entire IT lifecycle to reduce electronic waste. We have partnered with them for over 10 years.
- ELISE is a network of French "Adapted Enterprises" that promotes professional inclusion for workers with disabilities through the comprehensive collection, sorting, and recycling of non-hazardous office waste, like paper, plastic, cans, and cigarettes. Devoteam has worked with them for several years.

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

2.3.3 Actions and resources related to source use and circular economy and circular economy

GRI 306-1, 306-2

Devoteam’s operations have no significant impact on raw materials and do not involve the use of chemicals.

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

By tracking every device in a registry from purchase to disposal, we can overview our equipment and take our environmental responsibility.

- During the purchase phase, we favour TCO and Energy Star-certified computers (100% of French, Denmark and Corp computers, for instance).
- To maximise the usage and lifespan of provided equipment, Devoteam expects employees to maintain their devices carefully, specifically following guidelines for overall hardware preservation, optimal battery health, timely updates, and proper protection of devices. The Sustainable IT Charter emphasises that every employee should adopt eco-responsible habits from their first day, such as minimising printing and printing double-sided, and returning defective hardware to ensure proper repair or recycling. The group policy is to have a lifetime of 4 years for laptops/tablets and 3 years minimum, ensuring also the security of the device. The company also runs regular campaigns to drive and encourage employees to delete old files, emails, and programs that are no longer used to increase the capacity of the equipment and reduce the electrical consumption.

If a device gets broken, it is to be repaired, and when a device can not be used on client missions, it is refurbished to extend its life by internal reuse.

When the devices reach end of life, we have three paths:

- Donate to non-profit organisations or resell to employees
- 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 after a major clean-up. Ecologic is a government-approved eco-organisation that, among other things, 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.
- Make sure the devices are collected and materials get recycled, for example, by running a quarterly review of the assets in France.

2. Reduce and recycle general waste

Devoteam entities take action to reduce waste and raise awareness among our workforce, integrating eco-friendly 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: Empower the community and keeping low carbon footprint

Øredev is an international developers conference and one of the largest tech gatherings in the region, held annually in Malmö, Sweden. The event was established in 2005 by Jayway—known today as Devoteam Creative Tech—with the mission of sharpening the technical expertise of the local community and fostering knowledge. In 2025, Øredev welcomed over 1,100 participants and 119 speakers for more than 120 sessions under the theme To Infinity & Beyond, reflecting on the tangible legacy and impact of our innovations today. The event provides a vital space for networking and professional growth in software development, covering topics like AI, security, architecture, leadership and more. In 2025, one of the overarching themes was sustainability, with talks ranging from sustainable AI to emerging technology.

With a focus on the future —both in technology and for the planet, Øredev serves exclusively vegetarian and vegan meals on biodegradable bamboo plates and provides reusable water bottles to eliminate the need for disposable cups. Furthermore, the event is held at a sustainability-certified venue conveniently located near major bus and train stations to encourage eco-friendly commuting via public transport. Øredev also has a partnership with Mossy Earth, an organisation working with rewilding projects around the world. All to minimise its environmental footprint.

2.3.4 Targets and Metrics related to source use and circular economy and circular economy

GRI 306-3, 306-4, 306-5

	Target	2025	2024	2023
Total waste recycled		15,867 kg	18,3526 kg	15,515 kg
Non-Hazardous waste		15,262 kg	28,683 kg	64,679 kg
WEEE (hazardous waste) Including recycled	Reduce WEEE	908 kg	3,720 kg (1)	1,189 kg
WEEE (hazardous waste) Recycled	Increase recycled rate	95% (868 kg)	79% (2,929 kg)	86% (1,020 kg)
Reuse, donations and refurbishing		1,303.67 kg	1,499kg	883.05kg
Percentage of total operational waste diverted from landfill	Increase waste diverted from landfill	55.6% (16,735 kg)	61.2% (19,851.6 kg)	25% (16,398.05 kg)

Countries reported represents 76% of the workforce.
(1) In 2024, we had a large operation of reducing our IT devices stock in France, resulting in an increase in the WEEE, which does not represent the current trend.

The reported data on waste and recycled waste is based on a combination of estimated and self-reported information. Identified during recent audits, certain data points may involve inherent uncertainties. Ongoing efforts are in place to further refine data collection processes and improve the consistency and reliability of these indicators over time.

We want 90% of tech devices (computers, phones, tablets, screens, TVs, video conference devices, network equipment, printers) reused, donated, or recycled.

3. Social Information

3.1 Own workforce

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 include all employees (consultants and structure), except if precise.

			Value chain location			Time horizon		
			Upstream	Own operations	Downstream	Short term	Medium term	Long term
Employee Conditions, Health, Safety and Wellbeing. Human rights.	Scissors effect The risk of Scissor effect leading to a difference between salary increases for consultants and pricing pressure by customers, resulting in an erosion of the Group's margin.	Risk		x		x		
	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 the ability to recruit more talents.	Opportunity		x			x	
	Programmes promoting the 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 leads 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 an 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

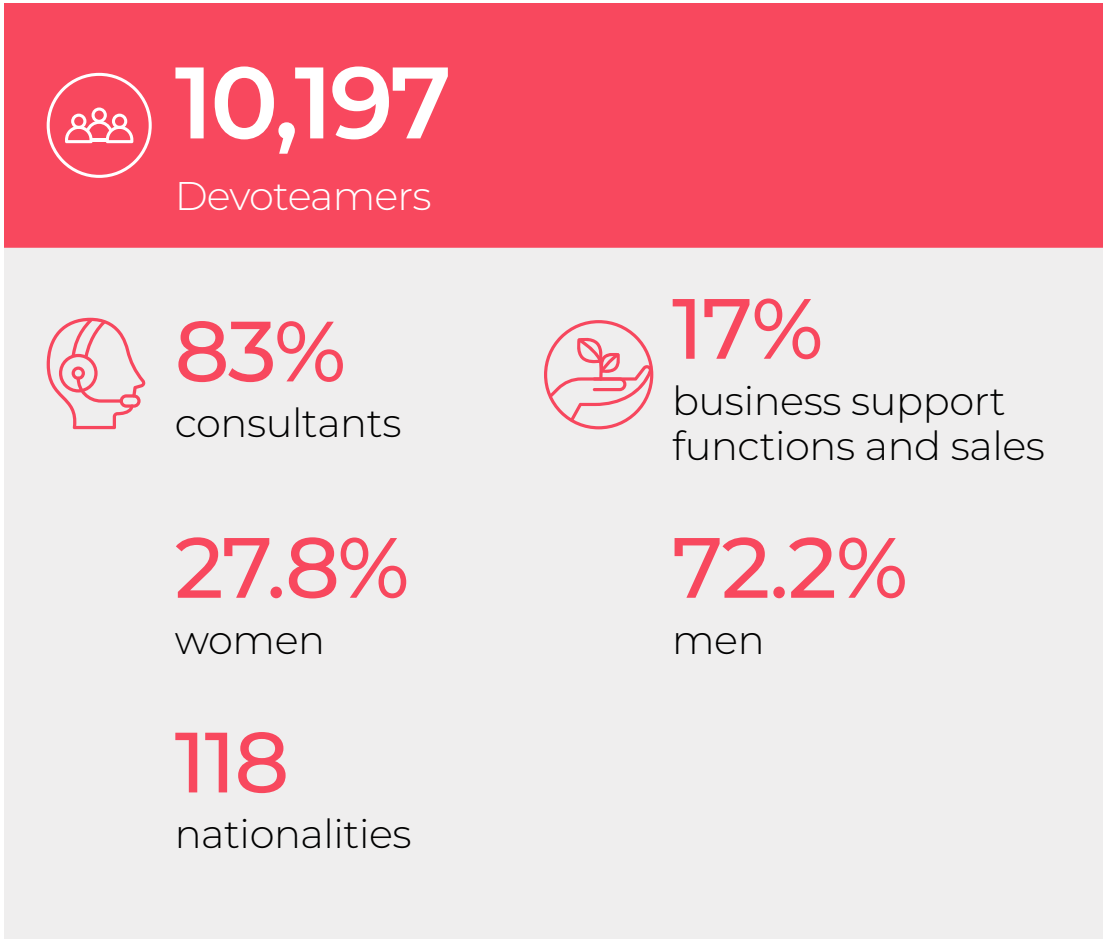
- Our people strategy is built on three main pillars:
1. A commitment to meritocracy, ensuring that we attract and retain the best talent, fostering a culture of excellence and innovation.
 2. Multidisciplinarity, bringing a diversity of thought and expertise, is essential to problem-solving, innovation and our competitiveness.
 3. The coexistence of several cultures within the company, which is a driver of human growth for the organisation and each of our talents.

At Devoteam, we believe in a positive human future within a tech-driven world where empowered talents can create a better tomorrow. Grounded in our core values of respect, frankness, ambition, entrepreneurship, and collaboration, and fueled by a deep commitment to CSR, we are committed to offering every employee meaningful personal engagement and transformative career paths. This dedication guides each stage of the employee journey—from recruitment and onboarding through to continuous training, development, and offboarding. Discover more on our career website.

3.1.2 Processes for engaging with own workers and workers’ representatives about impacts

GRI 2-26

Employee feedback is highly valued at our organisation. We work in 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

Driven by top management and led by Group Talent & Learning, Devoteam has, since 2020, done an annual group-wide employee survey to gather feedback and boost engagement. The survey, called Devmood, provides leadership with vital quantitative data and qualitative feedback to identify improvements and track progress. Our primary KPI for tracking is the Employee Net Promoter Score (eNPS), which indicates employees' willingness to advocate for the company as a good place to work. In 2025, we upgraded our platform to enhance how we listen and respond to our team. Every employee can now leave open comments on any question and engage in anonymous, two-way dialogues.

Simultaneously, managers can utilise new embedded dashboards to oversee feedback and action plans. This anonymity-protected process fosters an inclusive culture and gives valuable insights, including from groups that might be more vulnerable, where insights gained over the past year result in action for the next.

See metrics related to Devomood survey [S1-5] [S1-15]

Workers representatives

Our Workers' Representatives serve as a vital bridge between employees and management, fostering a direct line of communication through regular meetings. How often they meet depends on local agreements and is managed by local HR.

A primary pillar of the collaboration is the work environment, where management, HR, and representatives oversee everything from physical conditions like lighting and ventilation to psychosocial factors such as stress and team dynamics and are consulted on key initiatives. Workers' representatives are granted authority to ensure that employees’ views are included when decisions are made to protect employee well-being and maintain a secure workplace for everyone.

Attrition rate monitoring

Prioritising a stable workforce is essential for Devoteam, as low employee turnover ensures team consistency for our clients and reflects the overall health and well-being of our people. We track the attrition rate monthly to preserve the specialised skills and to minimise the economic costs of recruitment, with a portion of executive remuneration tied to our success in managing it. The attrition rate also serves as an indicator of employees' satisfaction throughout the year, a portion of executive remuneration tied to our success in managing it.

To support retention, we focus on three main areas:

- consistent manager follow-up,
- transparent career paths,
- clear expectations for technical certifications.

By using exit interviews, we identify the root causes of departures and implement local and group-level actions to improve the employee experience.

3.1.3 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 sent 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 an HR business partner, who is their primary contact for their career discussions, but also for any HR concerns.	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 "app portal", 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.

As an example, at the France headquarters, 100% of employees are covered by a collective bargaining agreement and company-level agreements ensuring representation by elected officials. Staff representatives are present in 100% of French entities meeting legal requirements, where they lead regular discussions with management. These discussions cover 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 2025, Devoteams had 12 incidents through the Whistleblowing alert system related to human rights. None of them were severe.

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

France example

Devoteam France is compliant with the professional elections. 6 subsidiaries have their own social and economic committees elected by employees, as well as points of contact for reporting and following up on 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.

In the annual 2025 negotiations, Devoteam SAS made an agreement with the trade unions to better support employee work-life balance.

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 are 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 (diversity, harassment, discrimination)
- termination of employment contracts
- vacations
- working conditions and working hours
- remuneration: the agreement defines minimum wages for the industry
- health & safety (sickness, accidents, parenthood)
- vocational training, career management

3.1.4 Working conditions

Devoteam prioritises employees' health and well-being, driving initiatives and providing services, mainly on local level, to support physical, mental, and social health. Working conditions and HR practices were defined as a material in the Double Materiality assessment, especially work-life balance, health and safety, resulting in more satisfaction and reduced attrition.

Work life balance and health and safety

Policies related to work life balance and health and safety

Through 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 prioritises 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 and follow the working hours, including overtime, by the time report system.

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

Devoteam's commitment to implementing and evolving its commitments requires the ongoing involvement of all stakeholders. The Global Health and Safety policy is completed with local policies to align with local contexts and regulations.

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 succeed, Devoteam drives processes, services, and initiatives that support their 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

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

- Safety at work
- Musculoskeletal disorders
- Psychosocial risks (harassment, stress prevention, or corrective measures. In cases of discrimination or harassment, actions are taken to support the individual)
- Psychological health (depression)
- Our process involves several actions to mitigate these impacts

Actions to Promote Employee Wellbeing.

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

Safety committees and officers: Most of our countries have committees and/or safety officers dedicated to well-being, safety, health stress, and burnout prevention strategies to define Health and Safety policies and actions. These representatives

also manage employee health and safety risk assessments for their respective localities.

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 needed. For example, Devoteam France has for several years partnered with Simundia to support employee well-being 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. Simundia also provides online resources with advice on topics like stress reduction, emotional management, and communication. Devoteam Denmark has a process to support employees returning from stress-related leave, conducting regular follow-up meetings with the employee throughout their return-to-work plan.

Ergonomic workstations and other preventions for musculo-skeletal disorders: Devoteam entities are responsible locally for performing workplace risk assessments (physical, ergonomic, and work with video display terminals) and health checks. They provide ergonomic chairs, adjustable wide screens, and height-adjustable desks to support better body posture, along with ergonomic mice. Some countries also lead prevention programs, including webinars on health and ergonomics, intranet pages with information on movement, best practices for working from home, and the 20-20-20 rule to reduce digital eye strain.

Devoteam Belgium has 2025 performed an OptiDesk survey for every employee to evaluate and improve workstations, assessing factors like ergonomics, work habits, and environment to provide personalised

advice and identify potential health problems.

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

Awareness and Training: Training is provided locally regularly to ensure the safety of the premises (fire checks) and 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 organisation also includes a specific module on this topic. At Devoteam France, 47 employees have taken the legally required training courses (fire, health and safety at work, etc.).

Also, 30 managers were trained in the prevention of psychosocial risks by an external organisation.

ISO 45001: Devoteam Germany has been certified ISO 45001 on Health and Safety Management System since 2024 (10% of operational sites of Devoteam).

To ensure a proper actions in the event of an emergency, Devoteam's premises are equipped with contingency plans and evacuation procedures for all working in the facilities, including subcontractors and service providers. The training courses outlined above are designed to train staff how to act in an emergency situation. Remote working is the primary solution for business continuity, as set out in the Business Continuity Plan, which is revised and tested annually.

Devoteam France and several other countries are compliant with the ISO 45001 guidelines, already holding ISO 14001 and ISO 9001 certificates.

100% of operational sites of Devoteam France are covered by the 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 has planned its certification audit with Afnor in November 2026.

2. Wellbeing

Devoteam's well-being and supportive programs are defined and managed locally, in accordance with local contexts, laws, and regulations. The local entities coordinate actions for employees, both in their professional and personal lives, to increase wellness, engagement, cohesion, and solidarity.

Remote working

Devoteam favours a hybrid working model to benefit from the flexibility of remote working while, at the same time, emphasising that time spent at the office is essential to build closer professional relations with colleagues and maintain our culture. Global guidelines were defined at the end of 2024 and have during 2025 been locally deployed and adapted with terms and conditions following exchanges with social partners and managers.

To support remote working, the Group has built an infrastructure to facilitate easy teleworking, providing professional software and equipment and equipping meeting rooms with video conferencing and jamboards. To mitigate any negative impacts on work-life balance, the Group acknowledges and supports the right to disconnect for all employees, providing clear guiding rules.

Promoting a healthy lifestyle

Devoteam is dedicated to promoting a healthy lifestyle across its entities, recognizing that personal well-being is of gain first and foremost for the individual, while also benefiting the collective strength of the company. Sport is encouraged in all geographies through internal clubs, and alternative commuting and activities are executed locally to ensure they resonate with the teams. We also organize challenges to build momentum and create communities; these initiatives are vital for our employees’ health and well-being, while simultaneously aligning with our environmental commitments.

Here are some examples of recent initiatives:

- **Step Challenges:** During sustainability month, Lithuania, Serbia, Spain and Sweden organised a Step Challenge to promote employee well-being and physical activity.
- **Try CrossFit** Devoteam Belgium organised a session for all employees to try CrossFit
- **Stress-reducing practice:** Devoteam Sweden and Devoteam France regularly organised yoga sessions at the office for all employees. Devoteam Belgium held a revitalising yoga and laughter session, where participants learned how laughter is a mood booster and stress reliever. This was followed-up by also learning more about how aromatherapy can reduce stress through scents and practises on how to breathe.
- **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 across French entities, placing employee-led clubs at the heart of the experience. With 28 active clubs spanning sport, music, gaming, photography, environmental initiative, like selling and buying used furniture and more, it is through these communities that engagement truly comes to life, creating authentic connections, shared passions, and a sense of belonging that goes far beyond the workplace.

Supported by dedicated happiness teams in each entity and fueled by 100+ events per year, the program also includes affinity groups focused on parenthood and disability, offering safe and inclusive spaces for employees to share their daily realities. Happiness@Devoteam is not a top-down initiative. It is a living ecosystem, shaped and energised by the people who make it.

Donating paid leave

Since 2018, Devoteam France staff have had the opportunity to support colleagues through paid leave donations. If an employee needs time to care for an ill child, a relative with a loss of autonomy, or a dependent or disabled parent, they can request a donation of days. Devoteam France grants the employee half of the total days required; the remaining portion is completed by volunteer employees offering their own days off. This system is applicable across all entities in France.

In 2025, 103 days were donated, half by employees and half by Devoteam, to support colleagues taking care of children.

Metrics related to health and safety

GRI 403-9, 403-10

Work-related accidents and disease

	2025	2024
Number of work-related accidents	1	0
Rate of recordable work-related accidents	1.45 in France	0
Number of fatalities as a result of work-related injuries and work-related ill health	0	0
Occupational disease Number of employees	1 employee	1 employee
Occupational disease Number of days	54 days	366 days

Data collected through local HR managers. All Devoteamers included.

Absenteeism rate

Countries	Absenteeism 2025	Absenteeism 2024	Absenteeism 2023
Austria	1.70%	3.52%	2.64%
Belgium	3.19%	3.41% (2)	2.75%
Belgium (G Cloud)	3.1%	Non reported	Non reported
Czech Republic	2.80%	2.90%	1% (4)
Denmark	3.37%	Non reported	Non reported
France	4.58%	3.73%	3.33%
Germany	3.02%	3.77%	4.32%
Indonesia	2%	1%	1.40%
Italy	2.60%	0.80%	1%
Lithuania	1%	0.74%	1%
Luxembourg	1.87%	2.45%	1.40%
Morocco	6%	7%	1%
Netherlands	4.10%	3.70%	2.80%
Norway	2.50%	4.90%	3%
Poland	1.10%	1.20%	0.10%
Portugal	6.19%	1.64% (3)	2.84%
Serbia	2.75%	2.20%	2%
Slovakia	5.08%	2.60%	1%
Spain	1.71%	1.43%	1.24%
Sweden Creative Tech	2.51%	3.86%	2.60%
Sweden G Cloud	1%	1.60%	
Turkey	2%	2%	Non-reported
UK	1.61%	5.83%	Non-reported (1)

Non-reported: Denmark, the Middle East, Tunisia, Sweden N Platform
(1) Non-reported in 2023 due to system changes.
(2) Excluding the G Cloud entity.
(3) Excluding the Cyber Trust entity
(4) The Czech Republic and Slovakia together

Targets and metrics related to work-life balance metrics

Responses to Devomood internal engagement survey

	target	2025	2024	2023
Response rate	75%	77%	76.5%	74.4%
eNPS	>30	32	29	32
Rating on work-life balance	8.5/10	8/10	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

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.

Policies related to adequate wages and social dialogue

As a signatory of the UN Global Compact, Devoteam respects and promotes national laws and international labour conventions. Respect is one of our core values and we believe respect for

the dignity, rights and ambitions of all people is a cornerstone of business excellence.

Devoteam's Human Rights policy covers the subjects related to adequate wages and social dialogue. 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, covering also modern slavery, in the Group Human Rights policy, we commit to fighting against forced or compulsory labour and child labour.

Actions related to adequate wages and social dialogue, approaches to mitigating material risks and pursuing material opportunities related to the own workforce, and the effectiveness of those actions

Living wage and legal wage

At Devoteam, our commitment to compensation is operationalised through our Eagle For Value group operating model. This model is a core pillar of our strategy, creating a transparent and equitable framework for career development, skill certification, and salary structure directly linked to an individual's skills and career progression. Eagle For Value utilises a defined salary grid to limit wage inequality among

employees of the same rank and ensure that people are recognised and rewarded fairly for the value they create. It establishes a virtuous cycle where highly impactful consultants drive better project value, which in turn supports fair remuneration and reinvestment in our talent.

We provide continuous training on this model to our HR, sales, and management teams to ensure its consistent application across all regions. Eagle For Value formally connects personal growth with our collective business success. It establishes a virtuous cycle where highly impactful consultants drive better project value, which in turn supports fair remuneration and reinvestment in our talent.

Salary data is monitored in Workday and controlled by HR teams and top management, and wages are in accordance with local laws, regulations, and the standard of living.

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

Targets and metrics related to adequate wages, advancing positive impacts, and managing material risks and opportunities

	target	2025	2024	2023
Living wage (scope of analysis: 100% of our direct employees)	0% people with permanent contracts paid below the living wage	0%	0%	0%

Metrics related to social bargaining

Collective bargaining	2025	2024
Total percentage employees covered by collective bargaining agreements (1)	56%	66.3%

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

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, and may vary between countries. 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 equal treatment of all its employees throughout the entire employee journey. Our recruitment process is open to all profiles, including people with disabilities, and we encourage internal mobility wherever possible. Our recruitment tool, SmartRecruiter, allows the process to be traced in a complete, transparent, and harmonised manner, while protecting candidates' personal data.

Upskilling is a key focus in our rapidly evolving tech environment. All Devoteamers receive opportunities to get trained on both technical matters and soft skills. Our operating mode, Eagle For Value, clarifies career development, certifications, and salaries, ensuring fair treatment through a transparent salary grid.

Our performance management process is designed to align company strategy with execution, drive accountability, and improve organisational performance. It is fulfilled through a structured framework that starts with formal goal setting, continues with Mid-Year and End-of-Year reviews and is complemented by regular check-ins. During these reviews, managers evaluate an employee's performance, skills, and contribution against their goals and job responsibilities, offering specific feedback on both strengths and areas for improvement. The two-way dialogue is also dedicated to discussing career aspirations, identifying skill gaps, and determining necessary training, helping employees understand exactly how their performance contributes to strategic objectives. The End-of-Year review also enables managers to assess the employee's talent performance, differentiating between high, average, and low performers to plan rewards accordingly. This process is systematically entered and monitored via dedicated dashboards in Workday, allowing HR Business Partners to follow up and ensure consistency. If a team member has not completed a check-in within the last 12 months, automated notifications are sent to ensure that accountability reaches everyone.

3.1.5.1 Training and skills development

Policies related to training and skills development

Devoteam has, for years, committed to continuous learning and development, investing in our people through a learning framework that ensures they have the certifications needed to excel and deliver innovative solutions. Devoteam is acting in a market where required skills are changing fast, a reality accelerated by the rapid development of AI. The AI technological shift further emphasises the importance of continuous training to implement AI effectively in clients' cases and integrate it into our own daily tasks and workflows.

Devoteam's learning initiatives are focused on three key goals to ensure alignment and maximum impact:

- Being a premium AI-Tech consulting company by utilising innovation and expertise with a focus on "tech for people" and the practical application of AI.
- Being a learning company with a culture of continuous growth that empowers employees to master new tools through ongoing education in their daily professional lives.
- Preparing for the future by embracing change, investing in partnerships with technology leaders, and prioritising the continuous development of skills necessary to lead the AI transition for maximum impact and value.

Actions related to training and skills development, approaches to mitigating material risks and pursuing material opportunities related to the own workforce, and the effectiveness of those actions

GRI 404-2

At Devoteam, we invest in our employees' development through a comprehensive learning ecosystem. We have 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. Currently, we have 60+ AI Certifications recognised and a process to review and adapt monthly.
- internal boot camps and academies run by Devoteam experts and Devoteam trainers.
- 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 and a dedicated French Academy

focused on Google and AWS (with a view to expand to Red Hat, Atlassian and other strategic + gold partners)

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) with Workday Learning, which offers employees a single, comprehensive platform to request all training (both on-site and online), obtain their manager's approval, and participate in online sessions. In 2025, Workday Learning was successfully deployed to 5 geographies covering 50% of all employees. All other countries are expected to complete it in 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 to Workday, our HR tool, so certifications and training completion evidence are automatically uploaded to employee profiles, enabling 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 discounted courses to Devoteamers, encouraging knowledge sharing.

In addition to the above, each country has their own learning budget where it can invest in onsite training based on its 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 providing common learning across all countries and ensuring 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.

Content was updated in 2025 to reflect changes in AI and auto enrolls to all employees for completion within 3 months.

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, demonstrating 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. 8 badges were developed in 2025, covering 5,500 employees, with plans to expand to all consultants in 2026.

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 needed to operate as an AI expert. 2 badges were created in 2025, with plans to expand to 10 more AI jobs in 2026.

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.

To raise sustainability awareness among employees, the 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.

Sustainability is at the core of Devoteams 2025-2028 Amplify strategy with new Sustainability learnings embedded into the AI Level 2 Upskilling program. The 15-minute training is for all Consultants and provides a framework for building sustainable practices into everyday work, further embedding this critical topic into our everyday tasks.

Some countries are also offering deeper job-based training. For example, in 2024 Devoteam France launched a 14-hour training program (level 1: 8 hours; level 2: 6 hours). Today 45% of Devoteam France’s designers are trained in responsible and inclusive digital practices through level 1, and 21% 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 recognising and proposing solutions for errors. 76% of Devoteam France's designers are also trained in the eco-design of digital services.

Accelerating Knowledge sharing

In 2024, Devoteam launched a Knowledge Management initiative (KM) 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 — C0-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.

AI Talent Pipeline for the City of Copenhagen

Københavns Kommune is the city of Copenhagen's municipality responsible for managing essential daily services like education, and urban planning. The city had identified a dual challenge in its local economy: unemployment coexisting with a strong market demand for professionals skilled in AI. This created a bottleneck for local businesses and a barrier for unemployed citizens seeking to re-enter the workforce. To tackle this, the City of Copenhagen partnered with Devoteam on an ambitious upskilling program. The initiative, known as the AI Talent Pipeline, involved an AI Masterclass designed to equip unemployed citizens with practical, job-ready AI skills combined with a four-week internship that allowed the participants to hands-on apply their new knowledge to real-world business cases at local companies. Along this internship, a senior AI consultant at Devoteam gave personalized 1:1 guidance to ensure the participants' success.

By addressing the heart of the challenge and fostering a dialogue between all partners, the project ensured a collective alignment and a shared vision. Devoteam's 1:1 coaching of every student gave them guidance on how to apply and adopt their new knowledge and bring the company direct value of the internship. The project successfully created a new AI talent pool for local businesses in Copenhagen. It provided citizens with in-demand, job-ready skills and a career pathway for the future. At the same time, it established a proven model for upskilling and reducing unemployment to make the companies and society equipped to grow and develop in the AI age.

Targets related to managing training and skills development, advancing positive impacts, and managing material risks and opportunities

Target 2025	2025	2024	2023
Certifications 70% consultants certified	71%	68.5%	54%
# AI Certifications 1300	1,081	365	NA
GenAI Level 1 100% employees trained	75%	72%	NA
AI Level 2 50% Consultants trained	34%	NA	NA
Sustainability 70% employees trained	39%	32%	10%

Metrics related to managing training and skills development, advancing positive impacts, and managing material risks and opportunities

GRI 404-1, 404-3

	2025	2024	2023
% of employees who participated in performance and career development reviews	75%	74%	Non reported
Average training hours per employee	31.5	43.68	32.5
Number of employees trained to upskill (% in total workforce)	8187 (80.2%)	8,833 (86.8%)	5,545 (54.0%)

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 reports and upload their

certifications in Workday, enabling centralised monitoring.

Data is collected through a combination of self-reported inputs and system-based tracking tools, including Workday and Udemy, which provides activity data (time spent and usage per account). As a result, certain data points may involve inherent limitations linked to self-reporting practices and varying local monitoring approaches.

Ongoing efforts are underway to further harmonise training hour tracking methodologies across countries, with the aim of improving data reliability and strengthening the monitoring of training targets at global level.

From 2025, we offer a Udemy licence to all Devoteamers.

3.1.5.2 Diversity, Equality and Inclusion

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

The Devoteam Group is committed to 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 included in the Group **Human Rights policy**.

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 the own workforce, and effectiveness of those actions

Recruitment process

The Devoteam group strives for equal opportunities and seeks candidates who demonstrate solid technical and business fundamentals, as well as consulting qualities, where they share our core values and demonstrate soft skills, technical know-how and motivation for the consulting industry that establishes a long-term relationship spirit in the form of drive, leadership, impact and the ability to build assets.

All positions are open to people with disabilities, which is also shown in our job ads. We recruit on the basis of merit and believe that diversity contributes to the creativity, dynamism and excellence of the Group. Devoteam France has mandatory training for recruiters and managers in good ethical and non-discriminatory practices on disability, provided by an HR consulting firm. Our management tool, SmartRecruiter, allows the process to be traced in a complete, transparent and harmonised manner, while protecting candidates' personal data.

Job advertisement and hiring; participation in disability-focused recruitment events like Hello Handicap; Devoteam recruit from diverse ethnic backgrounds without discrimination of age, sex, orientation, or nationality.

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:

- **DEI Initiatives in Belgium**
Devoteam Belgium held a series of local activities regarding inclusion and the importance of an inclusive workplace through a dialogue on Diversity, Equity, and Inclusion (DEI). The series included presentations on the role of equity within the organisation and a platform for exchange on workforce diversity. Another initiative was a "Hack your bias" workshop and a webinar focused on supporting the career development of our consultants, especially women. Together, these activities provided insights and nourished the discussion regarding the importance of Diversity, Equity, and Inclusion across the organisation.
- **Femme Numerique**
Devoteam France was 2025 partnering with Femmes@Numérique and CEFCYS (Le Cercle des Femmes dans la Cyber) to host a "La Tech au Féminin" webinar to address the gender gap in

the industry and to support women in technology. The event was part of the Semaines Européennes du Développement Durable (SEDD) program, which is a pan-European initiative designed to promote sustainable development and encourage large-scale mobilisation through local actions that engage citizens, businesses, and organisations

Gender diversity

Devoteam actively promotes gender diversity and inclusion through a range of initiatives to enable everyone a fair chance to succeed.

Policy Enforcement:

Through HR and our leaders, we ensure our policies, including those related to equal opportunities and non-discrimination, are applied across all countries and levels of the organisation, and we have clear reporting mechanisms in place to address any violations and ensure accountability.

Employee Education:

Through a variety of methods, including workshops, e-learning modules, and interactive discussions, we conduct training sessions to educate employees on the importance of gender diversity and inclusion. These sessions cover topics such as unconscious bias, inclusive communication, and best practices for creating a respectful workplace to engage employees and promote understanding. In 2025, 1175 people did a training on diversity and inclusion matters. Devoteam France has trained 10.5% of its workforce.

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. Geographies, like France,

Belgium, Portugal and the Netherlands also encourage employees to join Women in Tech internal communities and feature workshops designed to enhance expertise and networking.

Talent Pipeline Development:

We collaborate with associations, schools and universities to provide educational programmes, workshops, and internships that encourage girls and young women to pursue careers in technology and that 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 actions. Our 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, and participate in conferences addressing the balance between disability and performance, like **SEEPH 2025** (Semaine européenne pour l'emploi des personnes handicapées). We also utilise responsible purchasing strategies, partnering with adapted enterprises to indirectly support employment for people with disabilities, and support initiatives to increase access to jobs for people with disabilities. For example, Devoteam Spain has, for several years, received students from Areteia School in its offices in Madrid, with the aim of motivating and inspiring these students, but also to show them the opportunities that await them in their professional future. Areteia School is a centre specialising in personalised learning pathways for students with diverse needs and learning difficulties. During these open-door sessions, around 30 students had the opportunity to learn about a company committed to promoting diversity, such as Devoteam.

Facilitate Disability at work

France

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

Since 2012, Devoteam disability service, the “Handicap mission” has been in activity 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.

Since January 1, 2024, we have withdrawn from the approved agreements and launched our new disability policy with 4 commitments and in spring 2025, an external audit mandated by AGEFIPH (Association de gestion du fonds pour l'insertion professionnelle des personnes handicapées) was conducted on Devoteam’s disability policy to identify topics for improvement.

The policy covers 4 main areas:

- 1. Integrating and developing employment for disabled employees through recruitment.** All job offers explicitly include a non-discrimination clause stating that positions are open to everyone.
- 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, and raising awareness among recruiters and HRBP. In 2025, Devoteam also onboarded a service dog to assist a person with a disability while working.

- 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. Devoteam has made videos with management promoting the inclusion of the disabled. The Handicap Mission is also raising awareness on disability issues among all our teams through in-house workshops and events. In 2025, Devoteam France participated in SEEPH 2025 (Semaine européenne pour l'emploi des personnes handicapées), organising activities around:

- **"Deep Game” On-site Animations:** Virtual reality experiences and an investigation to simulate the challenges of invisible disabilities.
- **Para-athlete Sports Challenge with Thomas Bouvais,** French table tennis athlete, disabled sport;

- **Educational Webinars:** The program featured a launch session on disability policy and specialised webinars covering invisible disabilities, imposter syndrome, and working with neuroatypical colleagues.
- **Solidarity Accessibility Challenge:** Devoteam partnered with the Streetco collaborative GPS app for a two-week challenge where employees mapped street segments and reported obstacles. This initiative resulted in 633 accessible street segments identified.
- **Employee testimonials:** leading to three employees beginning the RQTH (Recognised Disabled Worker Status) process.

Together these activities gathered 216 Devoteamers.

- 4. Developing internal policy in favour of partnerships with Disabled Friendly Companies (DFC).** In 2025, we strengthened our commitment to social inclusion by prioritizing partnering with disability-inclusive enterprises (EAs) for catering, logistics, and professional services. 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.

Cultural diversity

Devoteam promotes cultural diversity, fostering a wide range of perspectives and experiences. Our commitment to diversity and inclusion is reflected in our hiring practices, which actively recruit individuals from various ethnic backgrounds, creating a workforce that represents 118 nationalities and backgrounds.

Supporting nonprofits acting for Diversity and Inclusion

To actively promote Diversity and Inclusion in society, Devoteam Foundation proactively supports several nonprofit organisations working in this field. **#TechforPeople Labs** are mini-hackathons to collaboratively tackle a technological challenge that an association has to address. In 2025, Devoteam Foundation supported the following organisations:

- **Youth ID** is an association that promotes an intergenerational society, supporting young, disadvantaged people to become actors of change through learning and actions.
- **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.
- **TITACATITA**, also known as Associação Afrominds, works for inclusion and inclusive growth to ensure equitable opportunities by empowering children and young people through mentorship, educational resources, and leadership training.

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:**
Devoteam promotes a respectful, inclusive culture through managerial transparency and structured employee feedback loops, which are also reflected in our values.
- **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:**
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:**
Devoteam’s Ethics committee monitors alerts and ensures actions are taken, including potential intervention by authorities.

Strategic Report: Advancing an Equitable AI Future

In March 2025, the United Nations Headquarters hosted the high-level side event "AI: A Transformative Force for All Women & Girls" as part of the 69th Session of the Commission on the Status of Women (CSW69). Convened to accelerate the Beijing+30 Agenda, the session galvanized global leaders—including the President of ECOSOC, the Secretary-General of the ITU, Women 20 from G20 South Africa and Soroptimist International, —to address the intersection of gender equality and the digital revolution.

Supporting this multi-stakeholder dialogue, Devoteam was invited by Soroptimist International to facilitate the interactive segment, utilizing generative AI tools to help delegates cooperatively identify critical risks and solutions.

The collaboration resulted in a strategic report distributed to UN Member States, serving as an operational playbook to inform National AI strategies and implement tiered cyber safety training programs to protect vulnerable populations.

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	2025	2024	2023
The percentage of women in our teams	27.8% of women	27.7% of women	27.8% of women
The percentage of women in directors (1)	24.5% of women	24.7% of women	21.9% of women
Improve our Gender Pay Gap (2) - Adjusted per rank	7%	10%	Not reported (different calculation)
In France: Improve equality index (3)	French equality index: • 84/100 as an average • 6/7 entities with a score superior or equal to 75/100	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

(1) In OneTribe
(2) Calculation: average salary of men - average salary of women (per level/rank) / average salary of men
(3) 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](#).

Metrics related to diversity

Gender distribution in management and top management

GRI 405-1

	2025	2024	2023
Board of directors			
Total number of members	6	8	8
The underrepresented gender (female) in %	16.6%	12.50%	12.50%
Executive committee			
Total number of members	28	30	26
The underrepresented gender (female) in %	14%	13.30%	11.50%
One Tribe (Directors) (1)			
Total number of members	322	401	329
The underrepresented gender (female) in %	24.5%	24.70%	21.97%

(1) Since 2025, Devoteam France has been monitoring the percentage of women holding managerial positions ('cadres'). In its first year of tracking, women in these roles accounted for 30% of the female workforce.

Age distribution

	Total 31.12.2025 (1)	Total 31.12.2024 (1)	Total 31.12.2023 (1)
Workforce	10,197	10,171	10,331
<30	28.4%	30.33%	33.1%
30-50	61%	59.60%	57.5%
> 50	10.6%	10.07%	9.2%

(1) Measured on all employees (all Devoteam entities are using Workday since 2023)

Metrics related to persons with disabilities

indicator	Disabled employees in 2025	Disabled employees in 2024	Disabled employees in 2023
Belgium	0.53%	0.48%	0.46%
France (1)	2.20% (2)	1.68%	1.23%
Germany	4.41%	3.38%	3.56%
Italy	5.80%	4.69%	1.79%
Lithuania	4%	4%	3.90%
Middle East	0.31%	0.23%	0.51%
Portugal	0.92%	0.64%	0.50%
Spain	1.28%	1.29%	1.10%
Slovakia	3.57%	0%	0%

(1) Scope: Devoteam France, excluding BeTeam
(2) 1.98% calculated by URSSAF

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.

Metrics related to compensation (pay gap and total compensation) GRI 405-2

Gender Pay Gap

	2025	2024
Gender Gap - unadjusted	Not calculated (1)	14%
Gender gap - adjusted per rank	Not calculated (1)	10%
Gender gap billable - unadjusted	12.6%	10%
Gender gap per rank billable - adjusted per rank	7.1%	5%

(1) Necessary data for the calculation is incomplete

Incidents, complaints and severe human rights impacts

GRI 406-1

	2025	2024
# Work related incidents of discrimination	6	0
# of complaints filed through channel to raise concern	12	0

None of them is regarded as a severe that is, not being wide spread, irremediable or systemic.

3.1.6 Metrics related to workforce

Characteristics of the undertaking’s employees

Employee distribution in Headcount

	Total 31.12.2025 (1)	Total 31.12.2024 (1)	Total 31.12.2023 (1)
Workforce	10,197	10,171	10,331
Female	27.78%	27.70%	27.7%
Male	72.18%	72.26%	72.3%
Other / Non reported	0.04%	0.04%	

(1) 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	40		43
BELGIUM	55	332		387
CZECH REPUBLIC	41	78		119
DENMARK	102	219		321
FRANCE	1,196	2,754		3,950
GERMANY	80	215		295
INDONESIA	26	41		67
ITALY	16	53		69
LITHUANIA	15	59		74
LUXEMBOURG	31	125		156
MIDDLE EAST	141	513		654
MOROCCO	126	172		298
NETHERLANDS	64	312		376
NORWAY	46	70		116
POLAND	3	18		21
PORTUGAL	399	1,033		1,432
SERBIA	57	86		143
SLOVAKIA	7	21		28
SPAIN	271	880		1,151
SWEDEN	49	133		182
TUNISIA	79	103		182
TURKEY	1	19	1	21
UK	25	84	3	112
Total headcounts	2,833	7,360	4	10,197

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

Employment characteristics

Female	Male	Other / Not reported	Total
Number of employees (Headcount)			
2,833	7,360	4	10,197
Number of permanent employees (Headcounts)			
2,779	7,236	4	10,019
Number of temporary employees inc. apprentice (Headcounts)			
54	124		178
Non-guaranteed hours employees (Headcounts)			
0	0	0	0
Number of full-time employees (Headcounts)			
2,721	7,213	4	9,938
Number of part-time employees (Headcounts)			
112	147		259

Attrition

GRI 401-1

Female	31.12.2025	31.12.2024	31.12.2023
Unmanaged attrition rate (12 months)	15.2%	16.6%	19.4%
Total departure in headcount	2,638	2,866	3,453
Total hires in headcount	2,527	2,693	3,488

Characteristics of non-employee workers in the undertaking’s own workforce

GRI 2-8

Number of non-employees (FTE)	2025	2024 (1)	2023 (1)
Subcontractors	2,087	2,470	2,186

(1) The total number was estimated through different methods regarding the countries (direct FTE monitoring, extrapolation from the number of days invoiced or budget).

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 2025 is calculated on the averaged amount of actually number of subcontractors per month in each country.

3.1.7 Consumers and end-users

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	Downstream	Short term	Medium term	Long term
GDPR training for value chain data protection The impact of offering regular GDPR / data training to Devoteam staff, leading to a better understanding and protection of data along the value chain	Actual positive impact	x	x	x	x		
Strong internal data protection and security processes The opportunity of strong internal data protection and security processes, leading to increased trust, resulting in securing additional contracts	Opportunity	x	x	x		x	
AI development on the need for data protection The opportunity of AI development leading to an increasing need for data quality, security, and privacy, and a need for specialists to align processes on data protection, resulting in increased business opportunities and increased sales	Opportunity		x	x		x	

Policies related to consumers and end-users: Data Privacy

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

- The Data Protection Officer (DPO), appointed at the French authority in charge of Data protection (CNIL), is systematically involved upstream in all Group projects to coordinate GDPR topics and address related issues.
- Privacy Analyst, assisting the Data Protection Officer in all projects, and his primary mission is 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 the GDPR. Local GDPR referents (GDPR Local Advisors)

are named in each entity, to guarantee their obligations towards both local and European Data protection laws.

The Devoteam Group's security corpus relating to information security and personal data protection includes a General Data Protection Policy and a Data Retention Policy, which the Group Data Protection Officer and GDPR Local Advisors are enforcing within the Group.

Processes for engaging with consumers and end-users about Data privacy

In the event of a data breach, we take immediate action to mitigate the impact in accordance with established procedures and notify our clients without undue delay. Clients, acting as data controllers, are

responsible for informing the relevant stakeholders. Depending on the severity of the incident, we may also coordinate with local authorities and affected individuals. Regarding GDPR compliance, end-users (data subjects) may contact our clients to exercise their rights; we commit to processing all valid requests forwarded by the client.

More details about stakeholders' interests and engagement are described in SMB 2.

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 in our supply chain.

Data Leaks

In the event of a personal data leak, we immediately suspend the activity responsible for the exposure and restrict access to the compromised datasets. Following containment, we conduct a root cause analysis, ensure the secure deletion of any exposed data where applicable, and implement the necessary remediation measures to prevent recurrence.

Following the resolution of an incident

We conduct a through post-incident analysis to identify lessons learned and continuously update our methods, procedures, and training programs to prevent recurrence.

How to Raise Concerns (GRI 418-1)

Users may file a request through:

- The DPO's email address (**dpo.group@devoteam.com**) serves as the primary point of contact for local data protection stakeholders. All requests to exercise rights are centralised and managed through Dastra, our dedicated GDPR compliance tool.
- The whistleblowing alert system, available on our **website**
- The general contact information on the 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 Data Protection Officer

The Devoteam Group DPO 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 labelled 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;
- Maintaining an up-to-date record of personal data processing activities conducted by the Devoteam Group.

People awareness and training

Employee Awareness and Training

To effectively protect personal data, Devoteam Group ensures all employees are engaged in information security and data protection through several integrated channels:

- **In-house E-learning modules:** These include mandatory training on Data Protection, Secure Remote Working practices, and Phishing Awareness, alongside courses on Identity Fraud and related risks.
- **Phishing Simulations:** Regular awareness campaigns are conducted several times a year using the Sophos Phish Threat tool to strengthen defensive habits.
- **Targeted Communications:** Global and local updates are shared via the company's social network or email to address specific security needs or emerging trends.
- **Specialised Training:** The CISO and DPO teams provide tailored sessions for high-sensitivity functions, such as Human Resources and Sales, focusing on the specific nature of the data they handle.

- **Continuous Updates**
Security standards and best practices are regularly updated to align with:
 - Newly identified threats;
 - Evolving legal and regulatory obligations;
 - Specific client requirements.
- **Client-Specific Integration**
Finally, at our clients' request, we can facilitate and monitor the completion of specific security training (provided by the client) for our consultants prior to the start of their assignment.

2025 projects

Devoteam's 2025 strategy focused on several key Cybersecurity and Compliance initiatives:

- **Group-wide GDPR Compliance:** We continued the rollout of Dastra, our Group governance tool, to manage GDPR compliance at both the corporate and local entity levels. This approach allows us to precisely map all personal data processing activities across the Group. These initiatives also served as a vital touchpoint to reinforce data protection best practices—such as data minimisation, storage limitation, and the principle of least privilege—across all departments.
- **Risk Management & Impact Assessments (DPIA):** Significant emphasis was placed on conducting Data Protection Impact Assessments (DPIA) for our core tools and processes. These assessments, led by our Privacy experts in collaboration with all key stakeholders, identify and mitigate risks to the rights and freedoms of individuals before any processing activities are implemented.
- **Sovereignty & International Transfers:** In 2025, the DPO established Intra-group Data Processing Agreements (DPA) and associated risk assessments to secure data flows between our EU and non-EU entities. This ensures a consistent level of protection, regardless of geographic location.

- **Policy Governance:** We updated several core components of our security framework, most notably the General Data Protection Policy, which remains permanently accessible to all employees via the Devoteam Intranet.

Finally, these achievements result from close collaboration between our Group and Local CISOs, Security teams, and the Legal department. By securing internal projects throughout their entire lifecycle—from initial design and contracting to implementation and decommissioning—we ensure a robust Privacy-by-Design approach.

Handy’Up

Handy'Up is an association dedicated to defending the interests of people with disabilities and their families, addressing career development and facilitating professional integration for youth and workers, challenges in learning, communication, and social life through specialised programs. The association faced challenges with digitising social care practices and wanted to ensure its cybersecurity compliance and the protection of sensitive data to safeguard individuals' integrity. To address these risks, Devoteam Foundation conducted an audit assessing the association's compliance with both GDPR and the French regulation standards HDS (Hébergement de Données de Santé) to identify critical gaps. Additionally, the Foundation provided support to improve their IT business continuity plan (PCA, Plan de Continuité d'Activité) for the technical infrastructure to enhance their operational resilience.

This mission resulted in strategic recommendations and a dedicated awareness program to train the top management in cybersecurity best practices, to build the association's long-term robustness and regulatory compliance.

3.1.7.1 Metrics related to Data privacy

KPIs	2025	2024	2023
Personal Data Processing	236	200	150
Internal Project compliance	202	~ 280	~ 200
Impact Analysis	16	~ 20	~ 20
Personal right requests	72	180	120



3.2 Impact of IT
- Entity-Specific Topic

		Value chain location			Time horizon		
		Upstream	Own operations	Downstream	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	

3.2.1 Our sustainability offers

1.1.1 Policies

While we maintain our own internal sustainability pathway, our primary impact lies in supporting the sustainable digital transformation. Through our offerings, we support clients in leveraging technology to accelerate their environmental and social objectives. As tech-native specialists, we combine innovation with multi-disciplinary expertise to address urgent challenges, seeking the necessary balance between technology and sustainability to ensure tangible value.

In these dedicated offerings, we also integrate sustainability by prioritising energy efficiency, hardware optimisation, carbon awareness and eco-

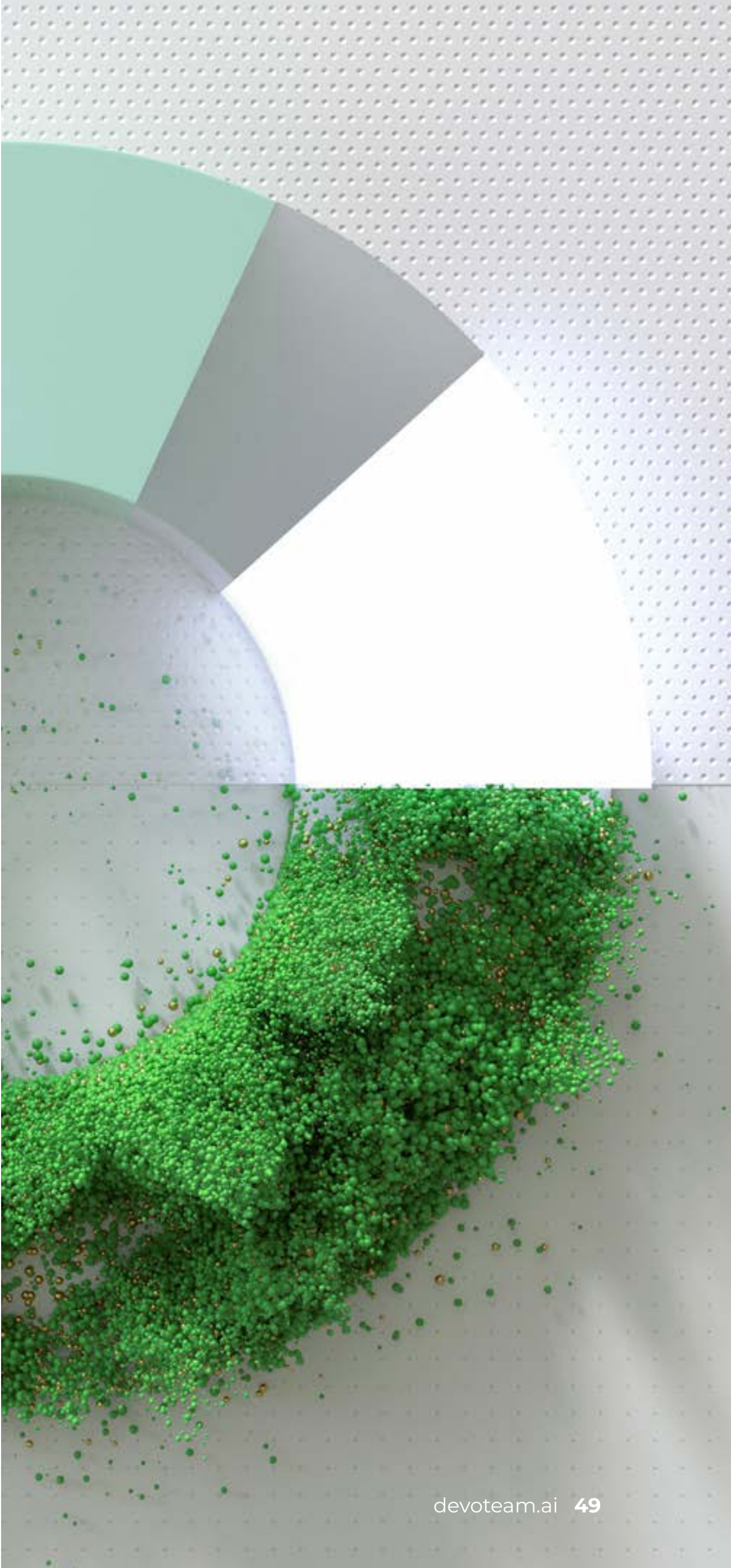
design. This approach is increasingly vital given the expansion of AI technologies; while we recognise the potential of AI to tackle sustainability issues, we also acknowledge the associated ethical, social, and environmental risks. Consequently, we are committed to expanding the knowledge base regarding AI impact, exemplified by Devoteam’s partnership with The Shift Project and report **AI, data, and computing: shaping infrastructures for a decarbonised world**.

1.1.2 Actions

1.1.2.1 IT for Sustainability and Sustainable IT

In 2025, we have refined our sustainability offerings portfolio and continued to strengthen our sustainability offers through our established

- global governance, led by our central Sustainability Agency and local representatives, while adapting our portfolio to the fast-evolving sustainability stakes our clients are facing with two main offerings paths:
1. ‘Sustainability in AI and IT’ offerings include the following:
 - Reduce the carbon footprint of AI and digital.
 - Decrease equipment usage.
 - Lower energy and water demand
 2. Accelerating positive impact: Sustainability Transformation using Technology (AI/IT)
 - Accelerate society's sustainability transformation: We help businesses harness technology to enhance their positive impact on the UN Sustainable Development Goals (SDGs). For example, we built a digital twin for a leading pump manufacturer, enabling them to accelerate the design of new products that use significantly less energy and save water.
 - Enabling better Data-Driven Decisions: The foundation of any effective sustainability strategy is reliable data. We help our clients get their ESG data right by designing and implementing robust data models and systems. This empowers businesses to act decisively on sustainability issues, make better decisions to reduce their negative impacts, and accelerate their positive contributions to a more sustainable future.



1.1.2.2 Raising awareness on Sustainability in AI/IT and Sustainability by AI/IT among our ecosystem

Devoteam is committed to promoting the positive impacts of IT and increasing knowledge of the negative impacts to reduce them.

Today, we face a critical challenge: digital energy consumption is growing faster than forecasted, leading to an increase in greenhouse gas (GHG) emission and this challenge is particularly acute given the rapid expansion of AI use, which has accelerated the demand for computing power and electricity. We therefore need to reflect on practices and actions that limit the direct and indirect environmental impacts. Energy consumption from AI is a challenge the entire industry is facing, and we are committed to finding sustainable solutions that maximise the use of this enhanced computing power to ensure that the watt consumed drives a sustainable outcome.

Contributing to understanding tech impact

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.

In April 2024, Devoteam partnered with The Shift Project to understand and assess risks and impacts in the transition to a post-carbon economy, especially the environmental pressures of artificial intelligence. During 2025, Devoteam contributed with expert knowledge and experience,

supporting their project aimed at giving insights on the consequences of the accelerated use of AI. The collaboration culminated in a report, "AI, data, and computing: shaping infrastructures for a decarbonised world," which reports the current status and gives recommendations for the future, focusing on leveraging AI to find climate solutions and mitigate climate change faster, smarter, and better in terms of sustainable transition.

Raising awareness about sustainable IT

To promote sustainable digital transformation for our current and future customers, our employees and teams were also involved in impactful events and knowledge-sharing initiatives. In 2025, Devoteam engaged in ISAE-ENSMA's "Climate Change Week" meeting, where 200 students in aerodynamics, thermal engineering, and advanced materials explored the critical role of engineers in the ecological transition. During the event, we shared expertise on balancing technical innovation with environmental sustainability, specifically raising awareness regarding the energy footprint of AI and the importance of digital sobriety, highlighting practical solutions, such as model optimisation and eco-design.

The Sustainability Agency published a whitepaper focused on how clients can maximise their return on investment (ROI) of sustainability projects by addressing critical data and capability gaps. The report provides actionable insights to transform data architecture into a strategic asset, ensuring accurate tracking of progress and financial returns. By bridging these gaps, the whitepaper empowers clients to strengthen their sustainable business case and secure a competitive advantage.

All our sustainability insights are available on our **website**.

1.1.2.3 Our innovation programmes

Integrating sustainability into Devoteam's core activities demands a commitment to innovation, which is consistent with the Group's culture of intrapreneurship. These dedicated programs are examples of how we contribute to this innovation evolution.

TechRadar by Devoteam

The 2025 edition of TechRadar by Devoteam, which was the fourth edition, provides a comprehensive guide for leaders to navigate the evolving technology landscape and make informed decisions. Curated by over 100 Devoteam experts, this edition evaluates 150 emerging technologies across six categories, including Managed Platforms & Sustainable IT. A primary focus was on Generative AI, featuring a dedicated AI category and over 80 AI-augmented technologies. Devoteam plans to publish a new edition, providing an updated analysis of emerging digital trends to ensure organisations remain at the forefront of innovation in 2026.

Hackathons

Throughout 2025, Devoteam hosted hackathons led by both local geographies and international entities to foster collaborative technology development. These initiatives engage Devoteamers in problem-solving, ranging from proposing innovative IT solutions and improving existing software to designing entirely new applications.

On April 4th-6th, N Platform Pillar held a hackathon focused on the topic of Agentic AI through ServiceNow technologies. 79 participants from 11 countries brainstormed and competed on developing AI Agents through different use cases.

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

Research and innovation programmes

Gravity is Devoteam France's Research & Innovation program, aiming to bridge scientific research and technological innovation, promote a multidisciplinary approach, and tackle environmental, ethical, and societal challenges through AI.

Gravity 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 capitalisation.

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 2025, our research department represents:

- 600 contributors
- 12 PhDs
- €6M in revenue
- 35,000 human days invested
- Numerous prototypes and scientific publications

1.1.3 Targets & Metrics

Targets	2025	2024	2023
Continue involving employees in innovation through hackathons with our strategic partners and Devoteam Foundation Tech for People Labs	79 people involved in hackathons led withServiceNow 8 labs gathering 94 participants in 6 countries for 8 NGOs	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

3.2.2 Devoteam Foundation

GRI 2-29, 413-1

3.2.2.1 Policies

By sharing our digital expertise with the non-profit sector, the Devoteam Foundation turns Devoteam’s **Tech for People** vision into practice. Our goal is to help these associations work more effectively and advance their impact on society by using tech.

We provide consultants to engage with social innovation and support NGOs and entrepreneurs through three primary activities:

- **Skills donations:** Sharing their professional expertise to solve technical challenges.
- **Financial donation:** Providing direct funding to support an association.
- **Advocacy:** Promoting the use of technology as a force for the non-profit sector to leverage its impact.

3.2.2.2 Actions

In 2025, we continued our skill donation through two major activities: Pro Bono missions, which help non-profits define their needs and implement digital transformation plans, and #TechforPeople Labs,

which brings together multidisciplinary experts for three-hour workshops to solve specific technical challenges. Germany teamed up with its partner association, supporting them both with a pro bono mission and #TechforPeople Labs. The lab focused on creating a structured AI-themed workshop for schoolchildren aged 15 and older to introduce them to artificial intelligence, including practical, hands-on sessions and key ethical considerations.

In line with the 2025 ambition to increase the AI focus, Devoteam Foundation continued its partnership with The Shift Project, providing technical knowledge and experience to their research on AI's impact on the transition to green electricity. This research concluded in the report "AI, data, and computing: shaping infrastructures for a decarbonised world", detailing the project's findings. The foundation also continued 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. Besides pro bono work for associations, Devoteam Foundation provided the program with a webinar with practical knowledge on AI usage, specifically addressing potential risks, the regulatory framework, and safety protocols.

During spring 2025, Devoteam Foundation France hosted a specialised event to clarify AI for non-profit organisations and provide them with an understanding of how they could leverage AI in their work to increase their impact. Building on this event, Devoteam Foundation France will continue a series of seminars for partnered associations, to let their employees and volunteers also learn about best practices with AI.

Besides skills donation, Devoteam Foundation has, since 2007, given employees the opportunity to apply for a donation in the Call for Projects to found a nonprofit organisation in which they have a personal

involvement. In 2025, the Call for Projects financially supported 36 associations in 11 countries. Some countries, for example, Denmark, Portugal, Spain, and Sweden, have also taken local initiatives and donated money to local associations.

3.2.2.3 Targets & Metrics

Devoteam Foundation's ambitions and contributions

Ambitions and contributions	2025	2024	2023
Number of working days Devoteam Foundation engaged with non-profit organisations (1)	575	785	1,100
Appr 70% of supported non-profit organisations work on education and inclusion (2)	64%	74%	40%
Appr 30% of supported non-profit organisations work on the environment (3)	36%	26%	13%
Number of engagements in a global or local activity	2,482	4,216	3,924
Number of countries running DVT foundation programmes (Call for project, #TechFor People Lab, Probono)	12	13	10

(1) The figure for 2024 and 2025 includes associations supported in TechForPeople Labs and pro bono work.
(2) The figure for 2024 and 2025 includes associations supported in TechForPeople Labs and pro bono work in inclusion and education. The 2023 includes an association supported only with pro bono in education.
(3) The 2024 and 2025 figure includes associations supported by TechForPeople Labs. The 2023 includes an association supported only with pro bono work.

4. Governance Information

The role of the administrative, management and supervisory bodies

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

Description of the processes to identify and assess material impacts, risks and opportunities

Devoteam conducted its first comprehensive Double Materiality Assessment (DMA) to identify the impacts, risks, and opportunities (IROs) material to our business conduct and operations in 2024. Coordinated by a CSRD core team, the process was conducted in collaboration with the Legal &

Compliance, Purchasing, and IT Security functions and integrated expert insights from the Data Protection Officer (DPO) and the Chief Information Security Officer (CISO). The assessment established the baseline for the entire Group, ensuring a unified approach to our sustainability and ethical strategy across all geographies. This assessment was reviewed by internal experts in 2025.

Acting mainly in regulated markets, material IROs were focused on new trends like AI ethics, data sovereignty, and cyber resilience. 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	Downstream	Short term	Medium term	Long term
Risk of bad ethical & security AI practices: The risk of AI development leading to a larger volume of data exchange and increased security/data protection/ethical risks, resulting in poor deliveries, reputational damage, and/or doubts about Devoteam's ability to achieve its AI-driven strategic plan.	Risk	✗	✗	✗		✗	



4.1 Business conduct

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

4.1.1.1 Business conduct policies and corporate culture

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

Devoteam has established and shared a framework of policies to promote a responsible business culture and ensure regulatory compliance. Central to this framework is our Code of Conduct, which outlines our commitment to legal compliance, ethical standards, and core values.

It is completed by a series of charters and processes applicable to both internal and external stakeholders and the AI charter is important to preventing the risk of bad ethical and security AI practices (material IRO).

Code of conduct

The Code of Conduct applies to all employees and defines the ethical rules, values and principles embedded in our operating practices. Since 2023, it also includes People and Environmental commitments. All Devoteam Group One Tribe members sign the Code of Conduct, updated about changes and trained in business ethnics. They are responsible for the proper dissemination, comprehension and effective application of this Code by all Employees in all geographies.

In 2025, Devoteam prepared a comprehensive update of the Code of Conduct, set to be officially launched in Q1 2026. A key highlight of this new edition is the introduction of a dedicated Gifts and Invitations Policy, providing clearer guidance and expectations for all employees on how to handle such situations in line with our ethical standards.

AI Charter

To address the challenges of AI, Devoteam has a specific AI charter to frame and align the usage within the entire group. This document completes the Devoteam IT Charter, which governs the access and conditions of use for the Group's information systems.

The second version of the AI Charter was released by Devoteam in 2024 to outline our commitment to responsible and ethical AI. Within this charter, we detail AI risks such as reputational threats, code vulnerabilities, and information leakage while providing guidelines for Devoteamers regarding ethics, reporting concerns, inputs, and outputs.

Furthermore, we have chosen to emphasise training as an essential component of deployment for GenAI at Devoteam. By following these guidelines, we aim to maintain our role as a trusted strategic advisor and improve efficiency through generative AI, all while upholding the highest compliance and security standards.

Group Compliance Programme (GRI 2-27)

The Group compliance programme, coordinated by the legal department, is responsible for compliance activities, 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, applies 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 ensuring that the

financial statements and various activities comply with laws and regulations, as well as with the Group's business and ethical directives.

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)

To ensure accessibility for all employees, our CSR Ambassadors serve as the local Single Point of Contact (SPOC) for their respective geographies, managing knowledge and acting for continuous improvement. Should a request require further expertise, local SPOCs can consult the CSR & Foundation Officer to ensure a comprehensive response.

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

Devoteam applies 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.

The Ethics Alert Committee, composed of General Counsel and Corp HR Business Partner, considers and responds to each alert. A specific policy defines the ethics alert process. 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.

4.1.1.2 Management of relationship with suppliers

GRI 308-1

Sustainable purchase

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 2025, we continued to consolidate our global supplier due diligence process, ensuring a consistent and rigorous assessment of our supply chain. This ongoing initiative evaluates our partners based on key criteria, including legal compliance, environmental responsibility, and alignment with Devoteam's corporate values. The results of this 2025 evaluation remain strong: Among Devoteam's top 150 suppliers, 53,5% have answered, and over 57% are now classified as either A or B within our internal ranking system. This sustained performance confirms that a majority of our partners not only meet legal requirements but actively uphold

our core principles, contributing to a resilient, responsible, and sustainable supply chain in line with our long-term ESG commitments.

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 all 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. As a result, the percentage of targeted suppliers with contracts containing clauses on environmental, labor, and human rights requirements and who signed the responsible purchasing charter or the supplier code of conduct has reached 100%.

Following the submission and reception of responses to our ESG questionnaire, Devoteam launched an interactive CSR webinars initiative for all its suppliers. They address key topics across all ESG pillars, specifically focusing on social engagement, ethical code of conduct, and carbon footprint.

The carbon footprint webinar aims to skill up our suppliers by teaching them GHG accounting methodology, and providing them practical tools, such as a tailored GSheet template developed by Devoteam to help them measure the carbon impact of their services within 6 months following the webinar. Engaged suppliers who share their data early receive exclusive rewards.

Ultimately, these sessions aim to demonstrate to our suppliers how improving overall ESG maturity enhances responsibility and business opportunities. This is why 100% of D-rated suppliers (representing 18% of all assessed suppliers) are placed on a CSR support plan, which requires them to attend these webinars to successfully learn how to calculate their carbon footprint.

The governance is managed by a Sustainable Purchase Committee, which consists of the purchase, compliance, and CSR departments. Meeting monthly, the committee analyses responses to the questionnaire, liaises with providers to suggest improvements, and coordinates applications across the different countries of the Group. improvement, and coordinate the application in the different countries of the Group. Reflecting these efforts, in 2025, Devoteam received a level A in the CDP Supplier Engagement Assessment. Locally, the Finance team is responsible for leading relationships with suppliers.

In 2020 and 2025, 100% of our purchasing department received sustainable procurement training, based on ISO 20400 guidelines. They are also supported by the CSR department. Some Devoteam locations - especially France and Corp - use CSR criteria in request for proposal (RFP) evaluations, with plans to expand this practice.

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), particularly for the organisation of events, 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 catalogue, available to anyone wishing to make an order, highlights Adapted Enterprises 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.

Subcontractors in Devoteam (GRI 2-8)

Devoteam occasionally engages subcontractors; however, they are not employees. In 2025, we engaged subcontractors representing the equivalent of 2,087 FTE across the entire Group. As the signatory of client contracts, Devoteam ensures subcontractor quality and reliability, while reinforcing its delivery capabilities through freelancers, startups or SMEs when specific expertise is unavailable internally. To monitor subcontractors and manage contracts, ensuring they consistently meet our duty of care standard, we utilize a digital platform and our subcontractor contracts mandate compliance with our Code of Conduct and charters. When required, they also complete mandatory e-learning modules and certifications.

One Devoteam entity, Be’Team, specializes in intermediation and has contracted with more than half of the group's subcontractors. Be’Team enables clients to access new talent pools, as freelancers, SMEs and innovative startups, and secure the right skills at the right time. Through its vendor consolidation management offer, Be’Team allows both customers and suppliers to collaborate within a secure, simplified framework.

4.1.2 Actions

4.1.2.1 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 and adopted by all of the Group's subsidiaries, in addition to the local charters already in place.

In 2025, the Charter underwent a significant revision, covering both its structure and content. The updated version is more comprehensive, with enriched content, a clearer and more accessible layout, and concrete examples of prohibited behaviours alongside explicit expectations in terms of conduct. These improvements aim to make the Charter a more practical and actionable reference for all employees and subsidiaries across the Group.

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

In line with our vision to centralise all learning resources in one place, our ethics training catalogue is now fully hosted on Devoteam's Udemy platform, including the "Fighting Against Corruption" module. This move ensures a seamless and consistent training experience for all employees across the Group. Building on the strong foundation of over 2,700 previously trained employees, nearly 700 additional employees completed the training in 2025, further extending our reach across entities and functions.

4.122Fight against fraud

Across the business, the Group is committed to mitigating fraud risk. Devoteam’s Legal & Compliance department has a delegated authority programme to prevent any fraudulent activity; this clearly communicates the types and sizes of transactions that certain employees are able to enter into on behalf of the Group. Every 3 years, the Internal Audit department performs audit assignments across all the Group entities, which include testing the operating effectiveness of related controls and collecting evidence in each specific entity. In 2024, 67% (16/24 countries) were audited, and it went to 75% in 2025 (18/24 countries).

4.123Combating anti-competitive practices (GRI 206-1)

Devoteam operates in a competitive sector in which a monopoly situation is forbidden. Devoteam categorically refuses to reach any agreement on prices with its competitors or engage in price dumping and to provide the best advice to clients, Devoteam Group is committed to a strategy of continuous innovation.

Devoteam also cares to prevent financial dependence on any client or sector. 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 requests for proposal (RFP) and referencing.

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 employees are potentially exposed to risks of corruption and anti-competitive practices (Directors, Operational Managers, Sales Representatives, Buyers, etc.), and therefore, all must complete a digital training module. The Human Resources department monitors the completion.

4.1.3 Targets and metrics GRI 205-3

Targets	2025	2024	2023
100% Managers signing the code of conduct (1)	100% managers signing the code of conduct	100% managers signing the code of conduct	95% managers signing the code of conduct
100% manager signing the related parties	95% manager signing the related parties	97% manager signing the related parties	90% manager signing the related parties*
100% Devoteamers trained on Ethics & AI	81% (GenAI level 1)	72% (GenAI level 1)	NA
Devoteamers trained on Business Ethic and Anticorruption (Scope: Devoteam SAS)	921 (23,3%)	812 (19,76%)	770 (18,25%)
ISO 37001 (% in total workforce covered)	2 geographies covered (3.36%)	2 geographies covered (4.12%)	1 geography covered (0,5%)

(1) One Tribe members

Confirmed incidents of corruption or bribery

	2025	2024	2023
# alerts or notifications regarding corruption or bribery through the alert ethics system or any other communication channels	1	0	0
# convictions for breaches of anti-corruption and bribery laws	0	0	0

Severe human rights issues and incidents connected to our consumers and/or end-users

	2025	2024	2023
Severe human rights issues and incidents connected to our consumers and/or end-users	0	0	0

4.2 Cybersecurity (Entity-specific topic)

Material impacts, risks and opportunities and their interaction with strategy and business model

In an increasingly digital landscape, Information Security is a paramount responsibility. Given the persistent rise of cyber threats and systemic reliance on technology, safeguarding data and infrastructure is a fundamental pillar of our operational integrity. For our organisation, as well as our clients and other value chain partners, this necessitates maintaining robust technical and organisational measures to protect stakeholder data. We are committed to ensuring business continuity and maintaining resilience against unexpected events that could disrupt critical operations. By prioritising security, we foster long-term trust and ensure the reliable delivery of our services, designating this as one of our most material sustainability topics.

		Value chain location			Time horizon		
		Upstream	Own operations	Downstream	Short term	Medium term	Long term
Cybersecurity training for value Chain security The impact of offering regular cybersecurity training to Devoteam staff leads to a better understanding and results in increased data security along the value chain.	Positive impact		x			x	
Unprotected employees devices The risk of unprotected employees' devices (laptops and mobiles) leading to potential security breaches, data loss, operational issues, and financial damage.	Risk		x		x		
Unprotected consultants' devices used for client mission The risk of unprotected consultants' devices (laptops and mobiles) used for client missions, leading to potential security breaches resulting in data loss, operational issues, and reputational and financial damage (including loss of contracts).	Risk			x	x		
Unmanaged BYOD The risk of unmanaged BYOD devices (laptops and mobiles) leading to internal or client incidents resulting in data loss, operational, reputational and financial damages.	Risk		x		x		

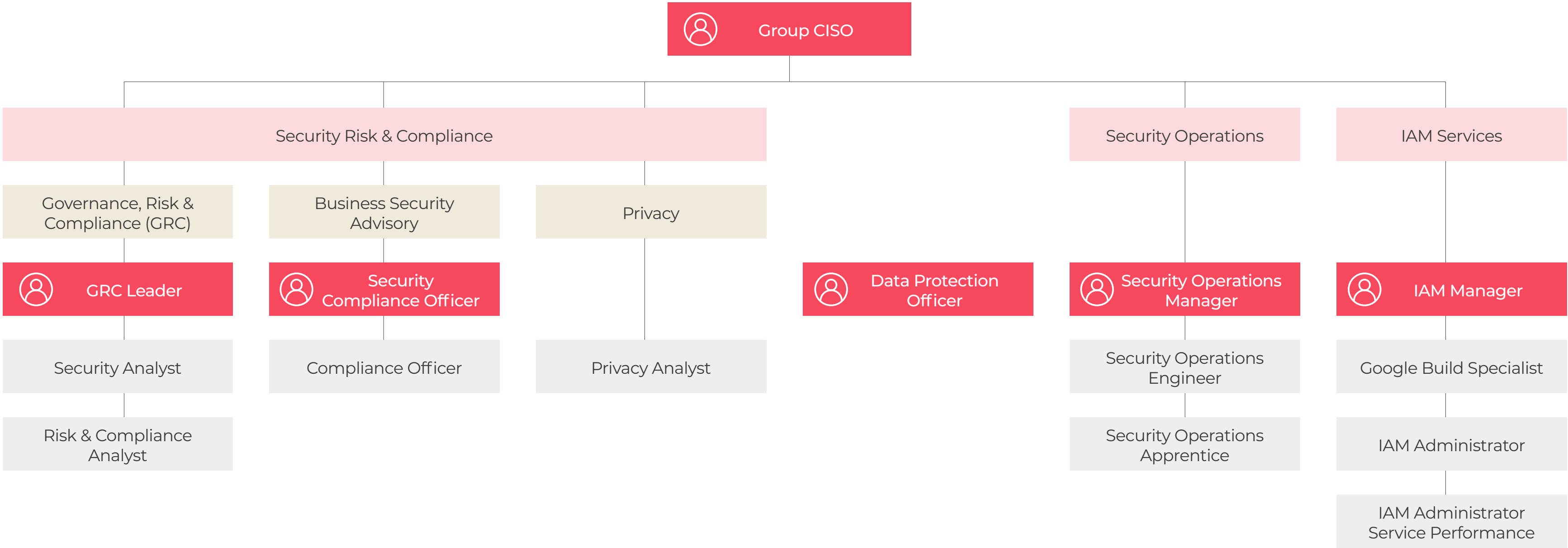
4.2.1 Policies

Devoteam’s security posture is governed at the highest level to ensure we outmanoeuvre an evolving threat horizon. Our commitment to staying ahead of the curve is reflected in our integration of risk intelligence into our operational framework, allowing us to safeguard internal assets while delivering robust, future-proof security for our clients.

Led by the Group CISO, a dedicated security team maintains the Information Security Management System (ISMS). This framework enables the organisation to assess risks and rigorously design, implement, and test mitigation strategies. At the heart of Devoteam’s ISMS are two essential pillars: a security-first culture and a security-by-design approach for every project.

At the core of Devoteam’s resilience is a robust policy suite aligned with NIS 2, ISO 27001, and GDPR. We bridge the gap between governance and action through rigorous operational procedures that ensure group-wide compliance. This transparent approach provides a "single source of truth" for our partners and regulators, while our Security team works daily to keep our standards at the absolute state-of-the-art.

Security Org Chart



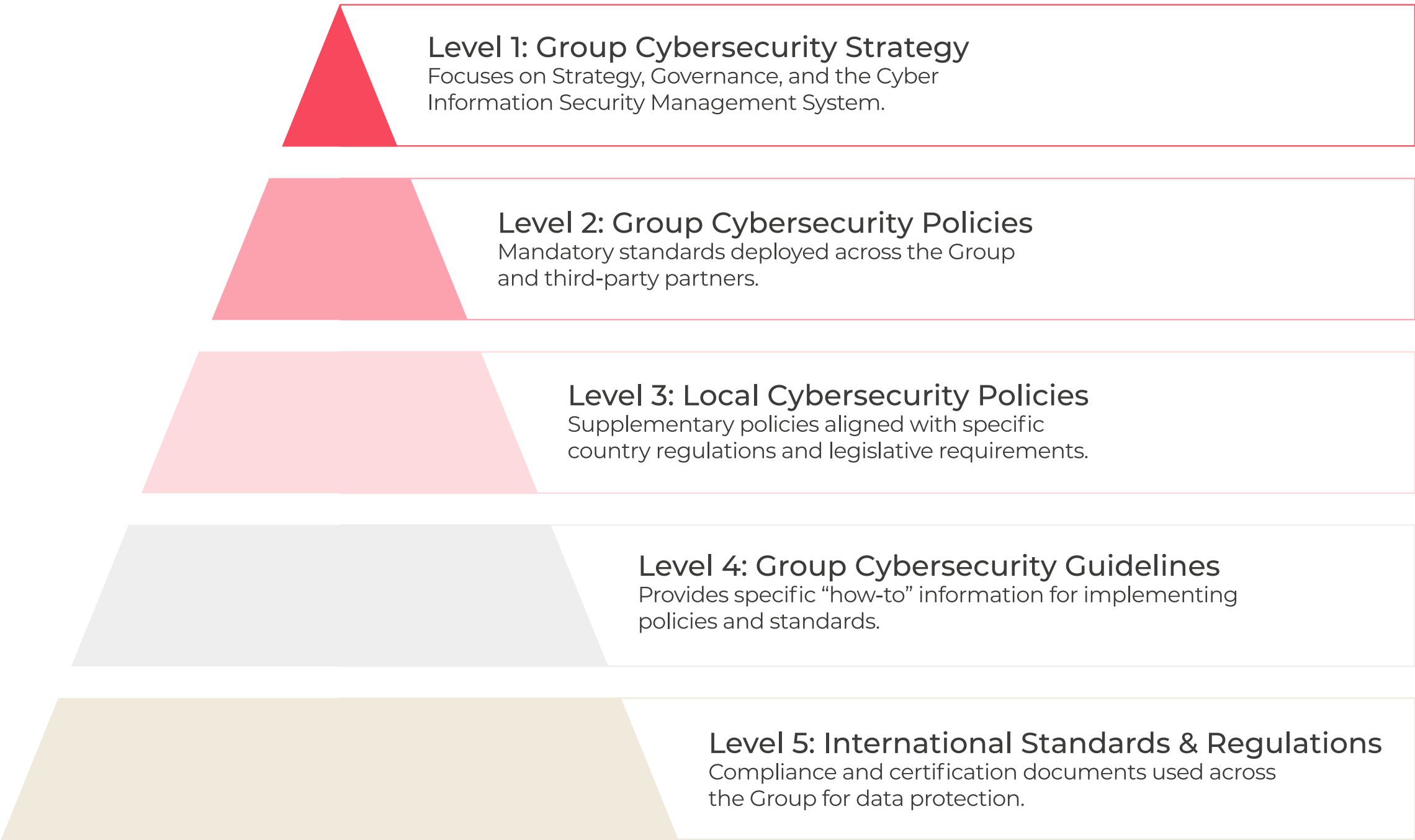
Stream Leader

Associate

Stream Name

Team Name

Cybersecurity Policy Framework 2024-2026



4.2.2 Actions

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

Highlights from the multitude of improvement activities conducted in 2025:

- Nearshore Security Standards: Standardised endpoint and network protection protocols and successful implementation for Nearshore.
- Modernised Incident Response: Initiated a new Incident Management framework aligned with current security mandates and involving all local CSOs.
- Next-Gen Email Security: Finalised requirements, testing and procurement for an AI-powered email security tool, and deployment on track for 2026.
- Rolled out Unified Endpoint Management (UEM) and Endpoint Detection and Response (EDR) to more than 8000 devices, i e, an increase by 2000 devices compared to 2024.
- Improved our phishing simulation campaign process and continued promoting information security culture with a comprehensive awareness programme including training courses and an onboarding curriculum. All employees are trained as soon as they arrive in the basic security principles summarised in the "Devoteam security standards".
- Updated our IT Policy, in order to support our general compliance efforts towards NIS 2 and ISO 27001 certification process.

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 2026.

Our information system management maturity scores demonstrate our commitment to excellence in this domain. Our CyberVadis 2025 score of 963/1000 (Mature level, Platinum Medal), based on the ISO 27001 standard, reflects our strong position in cybersecurity.

4.2.3 Targets & Metrics

Targets	2025	2024	2023
Become ISO 27001 at Group IT level (% in total workforce)	9 geographies certified (35%)	8 geographies certified (31%)	8 geographies certified (29.30%)
Cybervadis: at least maintain our maturity level. Increase our score	963/1000 Mature Level	906/1000 Mature Level	885/1000 Mature level
Devoteamers trained on Data Protection	88,9%	85.5%	90%
Number of confirmed information security incidents	6 (1)	0	0

(1) None caused serious consequences

Appendix



5.1 Our policies

	Policy	Scope
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*
Ethics	Code of conduct	Global
	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

		2025	2024	2023
GROUP	Total workforce	10197	10171	10331
	male	72%	72%	72%
	female	28%	28%	28%
	<30	28%	30%	33%
	30-50	61%	60%	58%
	>50	11%	10%	10%
Austria	Total workforce	43	42	38
	male	93%	93%	92%
	female	7%	7%	8%
	<30	30%	31%	24%
	30-50	47%	45%	53%
	>50	23%	24%	24%
Belgium	Total workforce	387	415	437
	male	86%	86%	84%
	female	14%	14%	16%
	<30	28%	28%	33%
	30-50	51%	51%	49%
	>50	21%	21%	19%
Czech Republic	Total workforce	119	119	109
	male	65%	63%	63%
	female	35%	37%	37%
	<30	18%	29%	28%
	30-50	76%	68%	68%
	>50	6%	3%	4%
Slovakia	Total workforce	28	22	14
	male	75%	73%	71%
	female	25%	27%	29%
	<30	36%	36%	36%
	30-50	57%	64%	64%
	>50	7%	0%	0%

		2025	2024	2023
Denmark	Total workforce	321	328	347
	male	68%	67%	67%
	female	32%	33%	33%
	<30	23%	20%	27%
	30-50	56%	60%	53%
	>50	21%	20%	20%
France	Total workforce	3950	4109	4219
	male	70%	69%	70%
	female	30%	31%	30%
	<30	30%	34%	38%
	30-50	61%	58%	55%
	>50	9%	8%	7%
Germany	Total workforce	295	355	393
	male	73%	76%	77%
	female	27%	24%	23%
	<30	8%	11%	15%
	30-50	59%	56%	54%
	>50	33%	33%	31%
Indonesia	Total workforce	67	42	38
	male	61%	64%	74%
	female	39%	36%	26%
	<30	49%	52%	47%
	30-50	50%	45%	50%
	>50	1%	2%	3%
Italy	Total workforce	69	64	56
	male	77%	75%	79%
	female	23%	25%	21%
	<30	16%	17%	14%
	30-50	49%	50%	52%
	>50	35%	33%	34%

		2025	2024	2023
Lithuania (CMS)	Total workforce	74	75	77
	male	80%	80%	79%
	female	20%	20%	21%
	<30	28%	35%	34%
	30-50	71%	64%	64%
	>50	1%	1%	3%
Luxembourg	Total workforce	156	144	140
	male	80%	78%	79%
	female	20%	22%	21%
	<30	29%	27%	31%
	30-50	68%	69%	66%
	>50	3%	3%	3%
Middle East	Total workforce	654	648	593
	male	78%	78%	20%
	female	22%	22%	80%
	<30	36%	34%	31%
	30-50	61%	63%	65%
	>50	3%	3%	4%
Morocco	Total workforce	298	198	162
	male	58%	51%	47%
	female	42%	49%	53%
	<30	45%	41%	43%
	30-50	50%	52%	49%
	>50	5%	7%	8%
Netherlands	Total workforce	376	390	359
	male	83%	83%	84%
	female	17%	33%	16%
	<30	14%	20%	24%
	30-50	65%	58%	57%
	>50	21%	22%	19%

		2025	2024	2023
Norway	Total workforce	116	121	138
	male	60%	59%	60%
	female	40%	41%	40%
	<30	18%	21%	20%
	30-50	44%	44%	46%
	>50	38%	36%	33%
Poland	Total workforce	21	23	28
	male	86%	78%	75%
	female	14%	22%	25%
	<30	52%	35%	43%
	30-50	48%	61%	54%
	>50	0%	4%	4%
Portugal	Total workforce	1432	1405	1408
	male	72%	73%	73%
	female	28%	27%	27%
	<30	26%	29%	31%
	30-50	69%	67%	65%
	>50	5%	4%	3%

		2025	2024	2023
Serbia	Total workforce	143	131	144
	male	60%	55%	57%
	female	40%	45%	43%
	<30	37%	42%	47%
	30-50	58%	55%	51%
	>50	5%	3%	2%
Spain	Total workforce	1151	1086	1002
	male	76%	78%	77%
	female	24%	22%	23%
	<30	29%	30%	30%
	30-50	58%	60%	60%
	>50	13%	10%	10%
Sweden	Total workforce	182	196	186
	male	73%	72%	74%
	female	27%	28%	26%
	<30	12%	13%	22%
	30-50	68%	70%	65%
	>50	20%	17%	13%

		2025	2024	2023
Tunisia	Total workforce	182	147	108
	male	57%	62%	63%
	female	43%	38%	37%
	<30	47%	44%	38%
	30-50	52%	55%	61%
	>50	1%	1%	1%
Turkey	Total workforce	21	22	25
	male	91%	91%	96%
	female	5%	5%	4%
	<30	19%	23%	28%
	30-50	67%	68%	68%
	>50	14%	9%	4%
United Kingdom	Total workforce	112	89	106
	male	75%	73%	80%
	female	22%	24%	20%
	<30	21%	15%	22%
	30-50	71%	72%	65%
	>50	8%	13%	14%



5.3 Carbon Footprint details & methodology

Performance Data - environment

	2025	2024	2023
Environmental management			
Employees covered by an ISO 14001-certified environmental management system	52.40%	56%	42.88%
Operational sites for which an environmental risk assessment has been carried out	36%	36.51%	-
Employees who have taken sustainable IT training level 1, including environmental issues	44%	32%	10%
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."	2,884.50	3,354.83	3,184.66
Electricity from renewable source (MWh)	1,100.32	1,755.79	1,867.55
Electricity from renewable source (% of total electricity consumption)	38.10%	52.3%	58.6%
Wastes	Metric tonnes		
Total general waste generated	30.089	32.422	65.751
Total waste recycled	15.867	18.353	15.396
Total non-hazardous waste	15.262	28.683	64.552
Total Hazardous waste	0.908	3.738	1.199
Recycled Hazardous waste	0.868	2.929	1.028

	2025	2024 revised	2024	2023
GHG emissions	Metric tonnes of CO2e			
Changes in total carbon emissions compared to 2022 (base year) - market-based	-28%	-23.50%	-25.7%	-15.3%
Market-based emissions intensity (metric tonnes of CO2e/employee in headcount)	2.55	2.72	2.64	2.96
Scope 1	2,738	3,227	3,389	3,559
Scope 2 - market based	1,276	1,220	1,220	1,193
Scope 2 - location based	1,333	961	961	1,044
Scope 3	22,014	23,219	22,193	25,825
Scope 3 - Upstream	22,014	23,219	22,193	25,825
Scope 3 - Downstream	0	0	0	0
Total market-based emissions (tCO2e)	26,028	27,666	26,802	30,577
Total location-based emissions (tCO2e)	25,910	27,383	26,542	30,428

Carbon breakdown per geography

	Scope 1	Scope 2 Market-based	Scope 2 Location-based	Scope 3	Total tCO2e Market-based	Total tCO2e Location-based
Austria	7.21	1.96	4.87	149.74	158.92	164.02
Belgium	410.42	194.78	223.73	1719	2324	2,332.65
Czech Republic	33.94	91.97	85.5	244.82	370.73	347.5
Denmark	43.79	9.84	16.12	748.05	801.69	788.17
France	686.99	48.74	84.52	7,920.76	8,656	8,684.15
Germany	292.3	28.87	54.42	587.83	909.01	916.56
Indonesia	1.24	17.08	34.21	140.94	159.27	176.36
Italy	16.67	2.98	4.96	114.13	133.78	133.65
Lithuania	7.06	27.37	7.26	152.09	186.52	163.75
Luxembourg	487.24	64.72	75.69	534.4	1,086.36	1,093.65
Morocco	131.34	1.16	1.23	886.28	1,018.79	1,019.12
Middle East	12.66	278.33	243.75	2,524.58	2,815.58	2,785.81
Netherlands	238.24	255.45	255.74	1,366.21	1,859.9	1,859.98
Norway	0.35	112.1	2.21	351.79	464.23	352.92
Poland	1.58	2.98	3.57	26.97	31.54	30.74
Portugal	146.09	2.59	12.06	1,579.83	1,728.51	1,731.14
Serbia	27.57	50.81	83.18	197.77	276.15	278.85
Slovakia	2.1	2.32	0.9	49.44	53.87	52.13
Spain	137.62	32.2	38.62	906.52	1,077.04	1,070.12
Sweden	4.31	24.14	20.46	563.71	592.16	586.37
Tunisia	40.87	1.08	32.68	319.17	361.12	383.62
UK	0.35	14.33	14.42	575.59	590.27	590.29

Methodology

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

The primary objective of these procedures is to minimise 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 CY2025 inventory is for the period January 1, 2025, through December 31, 2025.

Scope

Devoteam defines its organisational 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 centres, 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 2025, Devoteam will continue to review gaps add 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 which includes IT assets, manufacturing and company vehicles
 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 and 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 and 2
9. Downstream transport and distribution: visitors and customers travel
10. Processing of sold products: not applicable as Devoteam does not produce any intermediate products
11. Use of sold products: since Devoteam does 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 one subsidiary 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, and 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 customised 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 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 14		
BP-1	General basis for preparation of the sustainability statement	Page 16		
BP-2	Disclosures in relation to specific circumstances	Page 16		
GOV-1	The role of the administrative, management and supervisory bodies	Page 17		
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	Page 17		
GOV-3	Integration of sustainability-related performance in incentive schemes	Page 18		
GOV-4	Statement on due diligence	Page 18		
GOV-5	Risk management and internal controls over sustainability reporting	Page 19		
SBM-1	Strategy, business model and value chain	Page 20		
SBM-2	Interests and views of stakeholders	Page 21		
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Page 22		
IRO-1	Description of the process to identify and assess material impacts, risks and opportunities	Page 23		
IRO-2	Disclosure Requirements in ESRS covered by the undertaking's sustainability statement	Page 24		
ESRS E1	Climate change	Page 25		
E1.GOV-3	Integration of sustainability-related performance in incentive schemes	Page 18		
E1-1	Transition plan for climate change mitigation	Page 26		
E1.SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Page 25		
E1.IRO-1	Description of the processes to identify and assess material climate-related impacts, risks and opportunities	Page 26		
E1-2	Policies related to climate change mitigation and adaptation	Page 26		
E1-3	Actions and resources in relation to climate change policies	Page 26		
E1-4	Targets related to climate change mitigation and adaptation	Page 29		
E1-5	Energy consumption and mix	Page 29		

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 29		
E1-7	GHG removals and GHG mitigation projects financed through carbon credits	Page 29		
E1-8	Internal carbon pricing	Page 29		
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 31		
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 23	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 31	Non material but voluntarily reported	
E4-3	Actions and resources related to biodiversity and ecosystems	Page 31	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 31		
E5.IRO-1	Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities	Page 23	Non material but voluntarily reported	
E5-1	Policies related to resource use and circular economy	Page 31	Non material but voluntarily reported	
E5-2	Actions and resources related to resource use and circular economy	Page 32	Non material but voluntarily reported	
E5-3	Targets related to resource use and circular economy	Page 32	Non material but voluntarily reported	

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
E5-4	Resource inflows		X	
E5-5	Resource outflows	Page 32	Non material but voluntarily reported	
E5-6	Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities		X	
ESRS S1	Own workforce	Page 33		
S1.SBM-2	Interests and views of stakeholders	Page 21		
S1.SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Page 33		
S1-1	Policies related to own workforce	Page 35, 38, 39, 42		
S1-2	Processes for engaging with own workers and workers' representatives about impacts	Page 34		
S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	Page 34		
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 35, 36, 38, 40		
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Pages 38, 39, 41, 44		
S1-6	Characteristics of the undertaking's employees	Page 45		
S1-7	Characteristics of non-employee workers in the undertaking's own workforce	Page 46		X
S1-8	Collective bargaining coverage and social dialogue	Page 39		
S1-9	Metrics related to diversity	Page 45		
S1-10	Adequate wages	Page 39		
S1-11	Social protection	Page 39		
S1-12	Persons with disabilities	Page 45		X
S1-13	Training and skills development metrics	Page 41		X
S1-14	Health and safety metrics	Page 37		
S1-15	Work-life balance metrics	Page 38		X

Disclosure Requirements complied with	Name	Section in the sustainability report	Non-material	Omitted per phased-in disclosure requirements
S1-16	Compensation metrics (pay gap and total compensation)	Page 45		
S1-17	Incidents, complaints and severe human rights impacts	Page 45		
ESRS S2	Workers in the value chain		X	
ESRS S3	Affected communities		X	
ESRS S4	Consumers and end-users (Data privacy)	Page 46		
S4.SBM-2	Interests and views of stakeholders	Page 21		
S4.SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Page 46		
S4-1	Policies related to consumers and end-users	Page 46		
S4-2	Processes for engaging with consumers and end-users about impacts	Page 46		
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	Page 47		
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 47		
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Page 48		
ESRS G1	Business conduct	Page 53		
G1.GOV-1	The role of the administrative, management and supervisory bodies	Page 52		
G1.IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	Page 52		
G1-1	Business conduct policies and corporate culture	Page 53		
G1-2	Management of relationships with suppliers	Page 53		
G1-3	Prevention and detection of corruption and bribery	Page 54		
G1-4	Confirmed incidents of corruption or bribery	Page 55		
G1-5	Political influence and lobbying activities			
G1-6	Payment practices	X		

5.5 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 45
ESRS 2 GOV-1 21 e) Percentage of board members who are independent			X		Page 17
ESRS 2 GOV-4 30 Statement on due diligence	X				Page 18
ESRS 2 SBM-1 40d) i) Involvement in activities related to fossil fuel	X	X	X		Page 20
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 26
ESRS E1-1 16 g) Undertakings excluded from Paris-aligned Benchmarks		X	X		Page 62
ESRS E1-4 34 GHG emission reduction targets	X	X	X		Page 29
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 29
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 29
ESRS E1-6 53-55 Gross GHG emissions intensities	X	X	X		Page 30
ESRS E1-7 56 GHG removals and carbon credits			X		Page 30
ESRS E1-9 66 Exposure of the benchmark portfolio to climate-related physical risks		X			Page 25

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 32
ESRS E5-5 39 Hazardous waste and radioactive waste	X				Page 32

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 54
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 35
ESRS S1-3 32 c) Grievance/ complaints handling mechanisms	X				Page 34
ESRS S1-14 88 b) c) Number of fatalities and number and rate of work-related accidents paragraph	X		X		Page 37
ESRS S1-14 88 e) Number of days lost to injuries, accidents, fatalities or illness	X				Page 37
ESRS S1-16 97 a) Unadjusted gender pay gap	X		X		Page 45
ESRS S1-16 97 b) Excessive CEO pay ratio	X				N/A
ESRS S1-17 103 a) Incidents of discrimination	X				Page 35
ESRS S1-17 104 a) Non-respect of UNGPs on Business and Human Rights and OECD	X		X		Page 35
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 46
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 47
ESRS G1-1 10 b) United Nations Convention against Corruption	X				Page 11
ESRS G1-1 10 d) Protection of whistle- blowers	X				Page 53
ESRS G1-4 24 a) Fines for violation of anti-corruption and anti-bribery laws	X		X		Page 55
ESRS G1-4 24 b) Standards of anti-corruption and anti- bribery	X				Page 55

5.6 Table of entities within the Group

Legal name	Country	Company No.	Legal Address
Devoteam Middle East FZ	UAE	19886	Bldg 17, Office 369, Dubaï Internet City, UAE
Devoteam Consultancy	UAE	1684488	AlDana, East,8 - Salim Mohammad Al Saman
G&B Middle East FZ	UAE	103969	DMC-BLD05-VD-G00-917, Ground Floor, DMC5, Dubai Media City
Devoteam Consulting	Austria	FN42328y	Löwengasse 47, 1030 Vienna, Austria
Devoteam Technology	Austria	FN376147h	Löwengasse 47, 1030 Vienna, Austria
Devoteam	Belgium	0466.475.275	Culliganlaan 3, 1831 Machelen, Belgique
Fourcast Group	Belgium	0668.443.628	Culliganlaan 3, 1831 Machelen, Belgique
Devoteam G Cloud Belux	Belgium	0563.526.547	Culliganlaan 3, 1831 Machelen, Belgique
42 Technology Services	Belgium	0750.836.616	Culliganlaan 3, 1831 Machelen, Belgique
Devoteam	Switzerland	CHE-114.523.227	c/o MAZARS SA, Herostrasse 12, 8048 Zürich, Switzerland
Devoteam	Czech Republic	272 26 581	Ovocný trh 1096/8, Staré Město, 110 00 Praha 1, Czech Republic
Devoteam	Germany	HRB 133742	Neue Mainzer Straße 32-36, 60311 Frankfurt
Devoteam S'Team	Germany	HRB 93614	Neue Mainzer Straße 32-36, 60311 Frankfurt am Main
Devoteam Alegri	Germany	HRB 139867	Leopoldstr. 248, 80807 München
Enerhym	Germany	HRB 206620	Vor dem Haßel 6 d, 21438 Brackel
Affinis Enterprise Services	Germany	HRB 91385	Ubierring 11, 50678 Köln
Devoteam	Denmark	78068213	Kampmannsgade 2, 1604 København V
Devoteam Technology Consulting	Denmark	30919149	Kampmannsgade 2, 1604 København V
Devoteam Data Driven	Denmark	35657339	Kampmannsgade 2, 1604 København V
Cloudeon	Denmark	37196169	Kampmannsgade 2, 1604 København V
Devoteam Drago SAU	Spain	A83115667	Calle de Alcalá, nº44, 3º planta, 28014 Madrid, Spain
Be Clever	Spain	B95669073	Calle Autonomía, 26 4C, 48010 Bilbao, Spain
Inlogiq Software Quality	Spain	B98867054	9 vd. Cataluña Entlo. A, 46020 Valencia
Devoteam Managed Services Spain	Spain	B75980177	Torre Auditori, Paseo de la Zona Franca 111-121, Pl. 11 B08038 Barcelona
Deiser Desarrollo E Integracion de Sistemas	Spain	B81878597	Calle Pedro Muñoz Seca, número 2, 6a planta Madrid

Legal name	Country	Company No.	Legal Address
Deiser Consulting and Solutions	Spain	B56845001	Calle Pedro Muñoz Seca, número 2, 6a planta Madrid
Deiser Apps	Spain	B56845225	Calle Pedro Muñoz Seca, número 2, 6a planta Madrid
Devoteam UK Limited	United Kingdom	GB161451922	Berkeley Square House, Berkeley Square, London W1J 6BD
Devoteam G Cloud UK LTD	United Kingdom	10723684	Berkeley Square House, Berkeley Square, London W1J 6BD
UBERTAS CONSULTING LIMITED	United Kingdom	6080961	Berkeley Square House, Berkeley Square, London W1J 6BD
Devoteam	Croatia	45158767011	Kapucinska ulica 25, 3100 Osijek, Croatia
Enerhym solutions	Hungary	08-09-032760	Wesselényi utca 6, 9024 Győr, Hungary
Devoteam Cloud Services ID	Indonesia	1093744	Sequis Tower, Level 17, Jl. Jend. Sudirman No. 71
Voxpilot	Ireland	IE331443	BLOCK A, GEORGE'S QUAY PLAZA, GEORGE'S QUAY, DUBLIN 2, DUBLIN, IRELAND
Devoteam Italia	Italy	1823914	Via Tarchetti Iginio Ugo 1, Milano (MI), Italy
UAB Devoteam Lithuania	Lithuania	37196169	Boksto str 6 01126 Vilnius
Devoteam	Luxembourg	B59284	6, Rives de Clausen, L-2165 Luxembourg.
Devoteam Communication	Luxembourg	B166285	3, Rue de l'Industrie, L-8399 Windhof.
Devoteam	Morocco	56443	Marina Bloc 3, Bab Al Bahr – Marina Lamrissa Salé
Devoteam Services	Morocco	19405	Avenue Fal Ould Oumeir 57 Bureau N°3 3eme étage et N°4 4eme étage Rabat
Devoteam Consulting Maroc	Morocco	112857	7, rue Mariniyine, Hassan, 1000 Rabat, Maroc
Devoteam Mexico	Mexico	DME151215HR2	Paseo de la Reforma, 107 601 Col.Tabacalera. Mexico - Cuauhtemoc - Distrito Federal México 55100
Devoteam Nederland	Netherlands	30129709	John M. Keynesplein 10, 1066EP Amsterdam, Netherlands
Technology Management and Network Services	Netherlands	27249237	John M. Keynesplein 10, 1066EP Amsterdam, Netherlands
Devoteam G Cloud NL	Netherlands	78578647	John M. Keynesplein 10, 1066EP Amsterdam, Netherlands
Devoteam Business Automation	Netherlands	34351329	John M. Keynesplein 10, 1066EP Amsterdam, Netherlands
Devoteam	Norway	980 172 015	Tollbugata 24, 0157 Oslo
Devoteam G Cloud	Norway	914 443 822	Tollbugata 24, 0157 Oslo
Devoteam M Cloud	Norway	923 359 753	Tollbugata 24, 0157 Oslo

Table of entities within the Group - part 2

Legal name	Country	Company No.	Legal Address
Devoteam N Platform	Norway	936 126 928	Tollbugata 24, 0157 Oslo
Devoteam Poland	Poland	5252600363	Waryńskiego 3A, 00645 Warsaw, Poland
BoldInt	Portugal	509216595	Avenida D. João II, n.º 43, 9.º, 1990 084 Lisboa
Boldwealth	Portugal	513360530	Avenida D. João II, n.º 43, 9.º, 1990 084 Lisboa
Edotoutfit	Portugal	513662901	Avenida D. João II, n.º 43, 9.º, 1990 084 Lisboa
Integrity	Portugal	509072054	Avenida D. João II, n.º 43, 9.º, 1990 084 Lisboa
Devoteam	Serbia	20437260	Kis Ernea 4, Novi Sad, Serbia
Devoteam Saudi	Saudi Arabia	1010207542	Dhabab St. Devoteam Building / P.O.Box: 59405 11525 Riyadh Kingdom of Saudi Arabia
Devoteam Sverige	Sweden	556585-6498	Carlsgatan 6. 211 20 Malmö, Sweden
Øredev	Sweden	556700-3164	Carlsgatan 6. 211 20 Malmö, Sweden
Devoteam Holding	Sweden	556679-2460	Carlsgatan 6. 211 20 Malmö, Sweden
Devoteam G Cloud	Sweden	556615-1154	Klara Östra Kyrkogata 2B, 111 52 Stockholm, Sweden
Avalon Solutions Intressenter	Sweden	559194-2668	Carlsgatan 6. 211 20 Malmö, Sweden
Devoteam N Plateform Sweden	Sweden	556659-1664	Norra Allégatan 5, 413 30 Göteborg, Sweden
Devoteam	Slovakia	52346773	Plynárenská 7/A, 821 09, Bratislava - mestská časť Ružinov, Slovakia
Devoteam	Tunisia	1054816M	3, rue El Wakidi, Immeuble Yesmine, 1er Etage – El Menzah 4, 1004 Tunis
Devoteam Technology Consulting	Tunisia	1552747Q	3, rue El Wakidi, Immeuble Yesmine, 1er Etage – El Menzah 4, 1004 Tunis
Devoteam Impulse	Tunisia	1939513T	3, rue El Wakidi, Immeuble Yesmine, 1er Etage – El Menzah 4, 1004 Tunis
Devoteam Information Technology and Consultancy	Turkey	4955352	Acıbadem Mahallesi Çeçen Sokak Akasya Kent Etabı A1 Blok Kat. 22 Daire 112 - Üsküdar - İstanbul
Nubalia Cloud Computing PTY	South Africa	K2020/448165/07	Tygerforum A 2nd Floor, 53 Willie Van Schoor Avenue, Tyger Valley, Western Cape, 7530

Legal name	Legal form	RCS No.	Legal address	Siret No.
DEVOTEAM	SAS	402 968 655	Siège	
			73 rue Anatole France, 92300 Levallois-Perret	402 968 655 00165
			Etablissements secondaires	
			113 rue Anatole France, 92300 Levallois-Perret	402 968 655 00082
			1 rue Galvani, 91300 Massy	402 968 655 00140
			Batiment Equinoxe - 26 Mouton Duvernet, 69003 Lyon	402 968 655 00231
			8 rue Anatole France, 59000 Lille	402 968 655 00256
			11 rue Monteil à Nantes, 44000 Nantes	402 968 655 00264
			Immeuble le Colombia - 8 rue Claude Marie Perroud, 31100 Toulouse	402 968 655 00199
			48 Quai du Lazaret, 13002 Marseille	402 968 655 00280
			499 avenue de Paris, 79000 Niort	402 968 655 00272
Devoteam Consulting	SAS	412 077 000	Siège	
			73 rue Anatole France, 92300 Levallois-Perret	412 077 000 00070
			Etablissement secondaire	
Devoteam Outsourcing	SAS	443 486 667	26 Mouton Duvernet, 69003, Lyon	412 077 000 00104
			Siège	
Devoteam G Cloud	SAS	512 085 036	73 rue Anatole France, 92300 Levallois-Perret	443 486 667 00035
			Siège	
			26 rue du Général Mouton Duvernet, 69003 Lyon	512 085 036 00097
			Etablissements secondaires	
			8 rue Anatole France, 59000 Lille	512 085 036 00105
Be'Team	SAS	804 832 434	55 rue Anatole France, 92300 Levallois-Perret	512 085 036 00071
			Siège	
			73 rue Anatole France, 92300 Levallois-Perret	804 832 434 00018
			Etablissements secondaires	
			3 rue d'Edimbourg, 75008 Paris	804 832 434 00059
Devoteam G Maps	SAS	493 241 582	Chez Mama Works, 92 cours Lafayette, 69003 Lyon	804 832 434 00075
			Siège	
			26 rue Général Mouton Duvernet, 69003 Lyon	493 241 582 00078

Table of entities within the Group - part 3

Legal name	Legal form	RCS No.	Legal address	Siret No.
Devoteam Creative Technology France	SAS	812 422 590	Siège	
			73 rue Anatole France, 92300 Levallois-Perret	812 422 590 00057
			Etablissement secondaire	
			26 Mouton Duvernet, 69003 Lyon	812 422 590 00040
Devoteam Innovative Tech Enterprise Application	SAS	813 395 621	Siège	
			73 rue Anatole France 92300 Levallois-Perret	813 395 621 00010
Axance Technology	SAS	814 177 432	Siège	
			73 rue Anatole France 92300 Levallois-Perret	814 177 432 00014
Technologies & Operations	SAS	819 028 978	Siège	
			73 rue Anatole France 92300 Levallois-Perret	819 028 978 00016
MYFOWO.COM	SAS	493 895 296	Siège	
			73 rue Anatole France 92300 Levallois-Perret	Siège : 493 895 296 00058
Devoteam Revolve	SAS	488 374 299	Siège	
			73 rue Anatole France, 92300 Levallois-Perret	488 374 299 00102
			Etablissements secondaires	
			Batiment Equinox - 26 rue Général Mouton Duvernet, 69003 Lyon	488 374 299 00110
			11 rue Monteil, 44000 Nantes	488 374 299 00094
DEVOTEAM NEXDIGITAL	SAS	834 268 955	Siège	
			73 rue Anatole France, 92300 Levallois-Perret	834 268 955 00012

Legal name	Legal form	RCS No.	Legal address	Siret No.
MEL	SAS	808 834 402	Siège	
			73 rue Anatole France, 92300 Levallois-Perret	808 834 402 00022
Slag Management	SAS	808 360 077	Siège	
			73 rue Anatole France, 92300 Levallois-Perret	808 360 077 00032
DEVOTEAM GROUP	SAS	881 761 555	Siège	
			73 rue Anatole France, 92300 Levallois-Perret	881 761 555 00021
Devoteam AI Business Apps	SAS	941 964 611	Siège	
			73 rue Anatole France, 92300, Levallois-Perret	941 964 611 00011
Devoteam System of Work	SAS	942 660 358	Siège	
			73 rue Anatole France, 92300, Levallois-Perret	942 660 358 00014
Devoteam Modern Data Stack	SAS	943 095 901	Siège	
			73 rue Anatole France, 92300, Levallois-Perret	943 095 901 00014
Devoteam Hyperbots	SAS	992 699 231	Siège	
			73 rue Anatole France, 92300, Levallois-Perret	992 699 231 00013
StartX	SAS	449 970 524	Siège	
			73 rue Anatole France, 92300, Levallois-Perret	449 970 524 00061
			Etablissements secondaires	
Infinity	SAS	883 759 300	Tour Aurore, 18 place des reflets, 92400, Courbevoie	449 970 524 00053
			Siège	
			73 rue Anatole France, 92300, Levallois-Perret	883 759 300 00030
			Etablissements secondaires	
			2 rue Pereire, 92500, Reuil-Malmaison	883 759 300 00022

5.7 GRI Index table

Devoteam's sustainability report is built in alignment with 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 2025 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 organisation cannot comply with
- **Requirement 7:** Publish a GRI content index
- **Requirement 8:** Provide a statement of use
- **Requirement 9:** Notify GRI

GRI content index 2025					
"Statement of use		Devoteam has reported in accordance with the GRI Standards for the period 01.01.2025 - 31.12.2025			
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 2025	OMISSION		
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION
General disclosures					
	2-1 Organizational details	Pages 6, 20			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, 73			
	2-6 Activities, value chain and other business relationships	Page 20			
	2-7 Employees	Page 45			Editorial: Letter of commitment
	2-8 Workers who are not employees	Page 46			Voir G1 2
	2-9 Governance structure and composition	Page 17			NA
	2-10 Nomination and selection of the highest governance body	Page 17			"Social Information/Own workforce/Working conditions/
	2-11 Chair of the highest governance body	Page 17			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 17			
	2-13 Delegation of responsibility for managing impacts	Page 17			
	2-14 Role of the highest governance body in sustainability reporting	Page 17			
	2-15 Conflicts of interest	Page 53			
	2-16 Communication of critical concerns	Page 17			
	2-17 Collective knowledge of the highest governance body	Page 17			
	2-18 Evaluation of the performance of the highest governance body	Page 18			

GRI content index 2025					
GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION Sustainability report 2025	OMISSION		
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION
General disclosures					
	2-19 Remuneration policies	Page 38			
	2-20 Process to determine remuneration	Page 38			
	2-21 Annual total compensation ratio			Confidentiality constraints	
	2-22 Statement on sustainable development strategy	Page 5			
	2-23 Policy commitments	Pages 10, 11, 12, 53, 58, 60			
	2-24 Embedding policy commitments	Pages 10, 53			
	2-25 Processes to remediate negative impacts	Pages 22, 23, 34, 47			
	2-26 Mechanisms for seeking advice and raising concerns	Pages 34, 53			
	2-27 Compliance with laws and regulations	Page 53			
	2-28 Membership associations	Page 11			
	2-29 Approach to stakeholder engagement	Pages 21, 51			
	2-30 Collective bargaining agreements	Page 35			
Material topics					
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Page 23			
	3-2 List of material topics	Page 22			
	3-3 Management of material topics	Page 22			
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 2025					
GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION Sustainability report 2025	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 23			
	205-2 Communication and training about anti-corruption policies and procedures	Page 54			
	205-3 Confirmed incidents of corruption and actions taken	Page 55			
Anti-competitive behavior					
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	Page 55			
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 103: Energy 2025	103-1 Energy policies and commitments	Page 26			
	103-2 Energy consumption and self-generation within the organization	Page 29			
	103-3 Upstream and downstream energy consumption		X	Information unavailable/incomplete	
	103-4 Energy intensity	Page 29			
	103-5 Reduction in energy consumption	Pages 28, 29			

GRI content index 2025					
GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION Sustainability report 2025	OMISSION		
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION
Water and effluents					
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource		X	Not applicable	Water consumption is not highly material topic for Devoteam (Service Company)
	303-2 Management of water discharge-related impacts		X	Not applicable	Water consumption is not highly material topic for Devoteam (Service Company)
	303-3 Water withdrawal		X	Not applicable	Water consumption is not highly material topic for Devoteam (Service Company)
	303-4 Water discharge		X	Not applicable	Water consumption is not highly material topic for Devoteam (Service Company)
	303-5 Water consumption		X	Not applicable	Water consumption is not highly material topic for Devoteam (Service Company)
Biodiversity					
GRI 101: Biodiversity 2024	101-2 Management of biodiversity impacts		X	Not applicable	
	101-4: Identification of biodiversity impacts		X	Not applicable	
	101-5: Locations with biodiversity impacts		X	Not applicable	
	101-6 Direct drivers of biodiversity loss		X	Not applicable	
	101-7 Changes to the state of biodiversity				
Emissions					
GRI 102: Climate Change 2025	102-1 Transition plan for climate change mitigation	Pages 26, 27, 28			
	102-2 Climate change adaptation plan	Page 25			
	102-3 Just transition	3. Social information, page 33			
	102-4 GHG emissions reduction targets and progress	Pages 28, 29			
	102-5 Scope 1 GHG emissions	Page 30			
	102-6 Scope 2 GHG emissions	Page 30			
	102-7 Scope 3 GHG emission	Page 30			
	102-8 GHG emissions intensity	Page 30			
Waste					
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	Page 32			
	306-2 Management of significant waste-related impacts	Page 32			

GRI content index 2025					
GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION Sustainability report 2025	OMISSION		
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION
	306-3 Waste generated	Page 32			
	306-4 Waste diverted from disposal	Page 32			
	306-5 Waste directed to disposal	Page 32			
Supplier environmental assessment					
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	Pages 27, 53			
	308-2 Negative environmental impacts in the supply chain and actions taken	Page 53			
Employment					
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Page 46			
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees				
	401-3 Parental leave				
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 36			
	403-2 Hazard identification, risk assessment, and incident investigation	Page 36			
	403-3 Occupational health services	Page 36			
	403-4 Worker participation, consultation, and communication on occupational health and safety	Page 36			
	403-5 Worker training on occupational health and safety	Page 36			
	403-6 Promotion of worker health	Page 36			
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Page 39			
	403-8 Workers covered by an occupational health and safety management system	Page 36			
	403-9 Work-related injuries	Page 37			
	403-10 Work-related ill health	Page 37			

GRI content index 2025					
GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION Sustainability report 2025	OMISSION		
			REQUIREMENT(S) OMITTED	REASON	EXPLANATION
Training and education					
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Page 41			
	404-2 Programs for upgrading employee skills and transition assistance programs	Page 40			
	404-3 Percentage of employees receiving regular performance and career development reviews	Page 41			
Diversity and equal opportunity					
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Page 45			
	405-2 Ratio of basic salary and remuneration of women to men	Page 45			
Non-discrimination					
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	Page 45			
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 2025					
GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION Sustainability report 2025	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 51			
	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 53			
	414-2 Negative social impacts in the supply chain and actions taken	Page 53			
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 47, 53			

5.8 Assurance

This report was audited by Grant Thornton in May 2026. (GRI 2-5)

Audit evidence is available on demand.

5.9 Vigilance plan

Within this sustainability report, Devoteam details its vigilance plan, which aims to identify risks and prevent severe violations of human rights and fundamental freedoms, the health and safety of individuals, as well as the environment, arising from the activities of the company and those of its subsidiaries, subcontractors, or suppliers with whom it maintains an established commercial relationship.

As a cross-functional management tool, this vigilance plan aims to identify, prevent, and mitigate major risks related to the company's activities and its value chain, in alignment with the pillars of our VEEP model (Value: Governance | Environment | Ethics: Ethics, Compliance, and Responsible Purchasing | People: Human Rights, Human Resources, Health, and Safety).

In accordance with the requirements of Article L. 225-102-4 of the French Commercial Code regarding the vigilance plan, this report consecutively addresses:

- risk mapping across all themes (page 22);
- the evaluation procedures for our subsidiaries and third parties (page 53);
- the description of risk prevention and mitigation actions (page 25-28, page 33-37, page 38-44, page 46-58)
- the alert and reporting mechanism (page 53);
- the monitoring and effectiveness evaluation system for the measures (page 25-58).

5.10 Acknowledgements & contact

This report was coordinated by:

- **Carin Madsen Kollberg**, Group CSR and Foundation Manager
- **Perrine ANGIBAUT**, Group Reporting Manager
- **Brigitte DUZELIER**, Senior Report Group Analyst
- **Céline Ferreira**, France Quality and Sustainability Director
- **Lola Provost**, France CSR manager

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