

# Non-financial group report 2020

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## About this report

In accordance with sections 315b and 315c HGB (German Commercial Code) in conjunction with sections 289c to 289e HGB, this non-financial report contains the relevant disclosures on environmental, employee and social matters, as well as on respect for human rights, and anti-corruption and bribery.

The report was prepared on the basis of the Global Reporting Initiative standards (GRI SRS, version 2016). The GRI Content Index is available at [www.gft.com/sustainability](http://www.gft.com/sustainability).

The data and information contained in this report relate to the financial year 2020 (1 January to 31 December 2020) and correspond to the scope of consolidation for financial reporting.

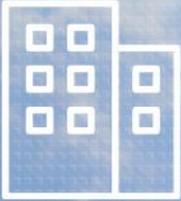
In some cases, only the five largest national companies by headcount (Brazil, Germany, Italy, Poland and Spain) are considered, which account for over 80% of the work force – a note to this effect is provided in such cases. Figures stated in the chapter 'Employees' only refer to active employment contracts.

The relevant financial information can be found in the combined management report and consolidated financial statements 2020. The corresponding documents are available at [www.gft.com/financialreports](http://www.gft.com/financialreports).

A key non-financial performance indicator for the GFT Group is the productive utilisation rate. Detailed information on this figure is published in the combined management report for 2020 in the chapter 1.5 Personnel.

The website links used in this document contain further information and are not a constituent part of this report. Exceptions are marked as such.

References to persons are to be understood as gender-neutral. For ease of readability, we refrain from using multiple mentions or paraphrases in certain passages – this does not imply any judgement.



# 1 The GFT Group



# 1 The GFT Group

We are a globally aligned technology partner for digital transformation focusing on the banking, insurance and industrial sectors. Our services include consulting, implementing and maintaining sector-specific core applications, as well as the development of new business models based on high-growth technologies such as artificial intelligence, cloud engineering, DLT/blockchain, DevOps and data analytics.

The parent company of the GFT Group (GFT) is the listed company GFT Technologies SE. It has a single-tier management and control structure with an Administrative Board as its ultimate management and control body.

Founded in 1987, the Group operates in more than 15 countries with around 6,000 employees. The GFT Technologies SE share has been listed on the Prime Standard segment of the Frankfurt Stock Exchange since 1999. Ever since its IPO, the company's largest shareholders have been Ulrich Dietz with around 26% and Maria Dietz with almost 10% of the shares. Detailed information on business activities and the business model can be found in the combined management report 2020 in the chapter 'Basic principles of the GFT Group'.

As a service provider, we generate most of our added value ourselves – the performance, expertise and motivation of our employees have a decisive influence on the quality of our services, the satisfaction of our clients and thus on the economic success of GFT. Our main suppliers are highly skilled IT specialists who support our core business. For the procurement of IT infrastructure, we have only limited opportunities to review our suppliers or influence their business practices due to our purchasing volumes; we focus in particular on environment-related criteria, such as energy efficiency. In the case of services for business operations, however, we can influence environmental/social criteria. Further information on the supply chain can be found in the notes to the consolidated financial statements (5.3 Cost of purchased services, 5.5 Other operating expenses).





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# Sustainability in the GFT Group

## 2 Sustainability in the GFT Group

Our [understanding of sustainability](#) is based on the five corporate values Caring – Committed – Collaborative – Courageous – Creative. These shape our cooperation with each other and with our external stakeholders: clients, partners, shareholders.

‘Responsibly shaping the digital future’ is the credo of our sustainability strategy. As a technology service provider, our sustainability efforts focus on the promotion of IT talent (‘Grow tech talent worldwide’) as well as on the ecologically and ethically responsible development and application of technologies (‘Sustainability by design’). Sustainable corporate management means for us, growing profitably in the long term – in line with our environmental and social goals and together with our stakeholders (‘Big enough to deliver, small enough to care’). In accordance with our business model, our non-financial reporting focuses on staff-related aspects and social commitment.

As a responsible employer, GFT is committed to fair, safe and healthy working conditions – a particular challenge in the past year, which was dominated by the outbreak of the Covid-19 pandemic.

We believe that having a sense of purpose and self-efficacy in the work that you do is a fundamental prerequisite for individual development. This is underlined by our employer branding strategy ‘Ready to grow’: our open and appreciative corporate culture aims to create an appealing working environment for all employees in which they can express themselves freely and shape their own career paths. With ‘Grow tech talent worldwide’, GFT and its employees support various target groups within the tech community and across company boundaries in order to enhance their technology skills and thus improve their future opportunities.



In the reporting period, we identified 9 of the United Nations Sustainable Development Goals (SDGs) with direct relevance to our business model. They have been incorporated into our sustainability strategy:

**SUSTAINABLE DEVELOPMENT GOALS** GFT ■

### CSR@GFT: Based on our five core values, we support the Sustainable Development Goals

**Sustainability by design.**

- 9 INDUSTRY, INNOVATION AND INFRASTRUCTURE
- 12 RESPONSIBLE CONSUMPTION AND PRODUCTION
- 13 CLIMATE ACTION
- 17 PARTNERSHIPS FOR THE GOALS

**Grow tech talent worldwide.**

- 4 QUALITY EDUCATION
- 5 GENDER EQUALITY
- 8 DECENT WORK AND ECONOMIC GROWTH
- 10 REDUCED INEQUALITIES

**Big enough to deliver, small enough to care.**

- 8 DECENT WORK AND ECONOMIC GROWTH
- 9 INDUSTRY, INNOVATION AND INFRASTRUCTURE
- 16 PEACE, JUSTICE AND STRONG INSTITUTIONS
- 17 PARTNERSHIPS FOR THE GOALS

The Administrative Board of GFT Technologies SE and the Managing Directors bear ultimate responsibility for our sustainability efforts. They are assisted by a global CSR team. The Global Risk Committee (GRC) is responsible for the risk management of non-financial risks.



## Identifying the main non-financial aspects and risks

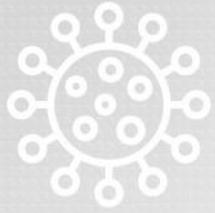
The materiality analysis conducted in 2017 assesses the GFT Group and parts of its supply chain. It is reviewed and enhanced on an annual basis. We consider sustainability aspects to be material if they have a direct or indirect impact on the Group's net income, reputation and resources. We also consider the direct and indirect effects of our business activities on all selected sustainability aspects.

| Matters acc. to 289c HGB                   | GFT sustainability aspect  | GRI Standard (GRI SRS, 2016)           | UN Global Compact principles | UN SDGs (Sustainable Development Goals) |
|--|--|--|------------------------------|---|
| <b>Environmental matters</b>               | Energy consumption   | 302                                    | 7, 8, 9                      | 12, 13                                  |
|  | Emissions  | 305                                    | 7, 8, 9                      | 12, 13                                  |
| <b>Employee matters</b>                    | Working conditions   | 403                                    | 3, 4, 5, 6                   | 8                                       |
|  | Remuneration   | 102-36                                 |                              | 8                                       |
|  | Participation  | 102-41, 102-43                         | 3                            | 8, 16                                   |
|  | Training and education   | 404                                    |                              | 4, 8                                    |
|  | Equal opportunity  | 405, 406                               | 6                            | 5, 10                                   |
| <b>Social matters</b>                      | Social commitment (digital education, technological responsibility, charitable projects) | No equivalent                          | 1, 6, 9                      | 4, 9, 12, 16, 17                        |
|  | Tax payment  | (207, introduced in 2019, not applied) | 10                           | 16                                      |
|  | Professional integrity (SASB, Sustainability Accounting Standards Board SV-PS-510a.2)    | No equivalent                          | 10                           | 16                                      |
| <b>Respect for human rights</b>            | Checking compliance  | 412                                    | 1, 2                         | 16, 17                                  |
|  | Employee data privacy  | No equivalent                          | 1, 6                         | 8, 16                                   |
| <b>Anti-corruption and bribery matters</b> | Combating corruption   | 205                                    | 10                           | 16                                      |
|  | Fair competition   | 206                                    | 10                           | 16                                      |

## Risk management and risk assessment

Within the framework of our Group-wide risk management system, a risk assessment was conducted for all significant sustainability aspects with regard to their probability of occurrence and the extent of any negative impact. No reportable risks from sustainability aspects were identified in connection with our business activities or our business relationships. Detailed information on the GFT Group's risk management system is published in the risk report of the combined management report 2020.





3

# Dealing with Covid-19



## 3 Dealing with Covid-19

As part of its Business Continuity Management (BCM), GFT mobilised the Operational & Emergency Response Team (OERT), which initiates all necessary measures to ensure both the safety of our employees and the smooth execution of client projects. At Group level, the committee defines the framework conditions (e.g. working from home) to be implemented at country level by the local OERTs in accordance with current developments, project requirements and the respective national regulations.

In late February, technical preparations commenced for the event that a growing number of employees would have to work from home. On 15 March, two days after the WHO declared the pandemic, all 6,000 or so employees were switched to remote working within 48 hours – while maintaining our high safety and quality standards and without any downtime. This was only possible because working in distributed teams has always been integrated into existing work processes and GFT has shifted the majority of its applications to the cloud over the last few years. This has given us a solid cloud infrastructure.

Although every country is prepared for a gradual return of staff to the office, all employees are still advised to work from home until the end of the first quarter of 2021. Compared to previous years, sick leave decreased by around 15% and the number of reported Covid-19 infections was low. Our productivity and efficiency remained at pre-pandemic levels in spite of remote working.

In the post-Covid-19 period, the focus will be on developing hybrid work organisation models – i.e. possible combinations of working in the office, from home or at the client's premises. In autumn 2020, all national companies began their initial evaluation of client requirements (e.g. screened blue rooms, on-site assignments), varying employee needs (e.g. flexibility, networking) and the related requirements of national occupational health and safety legislation.





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# Employees

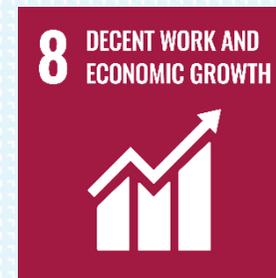


## 4 Employees

Although working in distributed teams was already well established at GFT before Covid-19, completely virtual cooperation poses a significant challenge for all involved. Daily interaction within the team, staff management, client assignments, the onboarding of new colleagues and the offboarding of departing staff – handling all these tasks virtually took some getting used to. Many employees faced multiple pandemic-related challenges, such as a lack of childcare, school closures or the need to care for relatives. Added to this are such potential dangers as an increased blurring of the boundaries between work and private life, as well as social isolation.

In view of the predominantly virtual interaction with staff, great importance was attached to transparent and authentic communication in 2020: for example, an internal BCM blog for all employees was already launched in late February 2020 with regularly updated FAQs and a world map indicating the access options for all GFT sites using a traffic light system. Various new communication channels and formats emerged during the course of the year, such as country-specific and Group-wide news portals 'NewsForYou', podcasts, GFT radio, virtual townhall meetings with the CEO and senior management, expert lectures and home exercise programmes. No standardised employee survey was conducted during the reporting period; however, the national companies surveyed staff about local lockdown measures, current remote working practices, and their wishes and expectations regarding where and how they would like to work after the pandemic.

With regard to staff-related aspects, we consider the three following areas: 'Activities and projects', 'Working environment' and 'Remuneration'.



## Activities and projects

Our human resources strategy is geared towards attracting, retaining and continuously developing talent around the world for GFT. At Group level, Global Human Resources defines the objectives and uniform standards for our HR activities under the direction of the corporate manager. These are then implemented by the local HR departments of the national companies. Our employer branding slogan 'Ready to grow' is an expression of the fact that the personal and professional development of our employees is a central component of our work culture – as our employees grow, so does the company (SDG 4 Quality Education).

With the introduction of the performance management model in 2018, we began to establish an employee-oriented approach to **performance assessment**. Instead of annual review meetings with superiors, we encourage our employees to develop their own personal and professional goals in a continuous dialogue (Individual Development Plan) and to reflect on them in discussions with their colleagues (Multi-Source Group). They are accompanied throughout their personal and professional career development by experienced mentors. We ensure a high level of technology expertise among our employees by offering a wide range of training courses on technologies, design principles and methods – in 2020, for example, over 1,000 certificates in the field of cloud engineering and architecture were awarded. In the GFT Accelerated Leadership Programme, employees are systematically prepared for their next career level. In addition, GFT promotes **continuous training** for all employees with language courses, seminars on soft skills and part-time vocational training qualifications. In the reporting period, a total of 18,752 training sessions were held. In total, our employees completed 194,731 training hours.

In addition to training, our development policy is based on a Group-wide and transparent **career model**. This pools similar activity profiles into job families (IT Professions, Consulting, Corporate Services). The required qualifications and skills are defined by experience levels: 'Skilled' comprises graduates, young professionals and trained specialists. 'Senior' refers to highly skilled and experienced specialists. 'Leaders' perform management tasks with and without staff responsibility. We regard specialist and management careers as equal development paths.

### Work force by job family

|                           | 2020 | 2019 | 2018 |
|---------------------------|------|------|------|
| % of work force           |      |      |      |
| <b>IT-Professions</b>     | 85   | 83   | 83   |
| <i>thereof woman</i>      | 18   | 20   | 21   |
| <b>Consulting</b>         | 6    | 7    | 7    |
| <i>thereof woman</i>      | 35   | 33   | 32   |
| <b>Corporate Services</b> | 9    | 10   | 10   |
| <i>thereof woman</i>      | 71   | 72   | 71   |

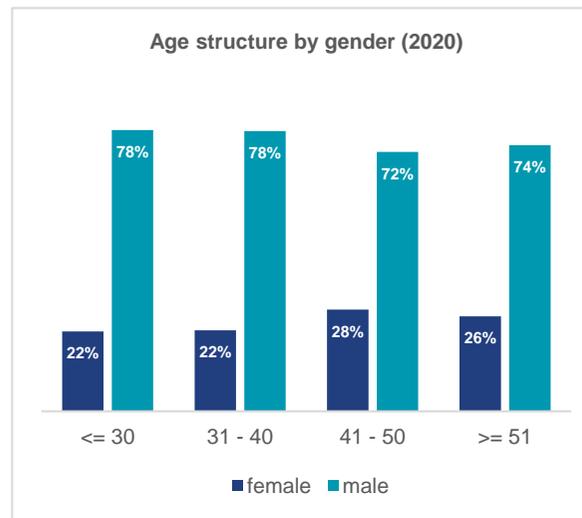
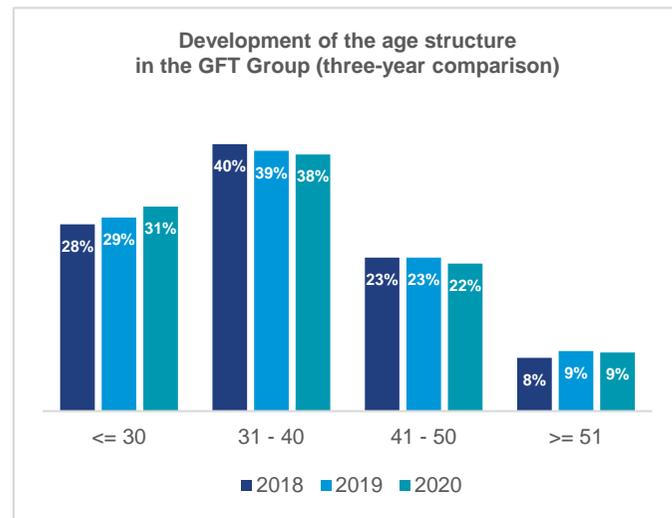
### Work force by experience level

|                      | 2020 | 2019 | 2018 |
|----------------------|------|------|------|
| % of work force      |      |      |      |
| <b>Skilled</b>       | 56   | 56   | 56   |
| <i>thereof woman</i> | 29   | 29   | 30   |
| <b>Senior</b>        | 38   | 36   | 36   |
| <i>thereof woman</i> | 21   | 23   | 23   |
| <b>Leader</b>        | 6    | 8    | 8    |
| <i>thereof woman</i> | 17   | 16   | 13   |



## Working environment

In 2020, the GFT Group's global team comprised around 6,000 employees with 75 different nationalities (2019: over 5,000 employees with 63 nationalities). Just under a quarter of our employees are women (24%, 2019: 26%). The proportion of management positions held by women amounted to 17% in 2020 and continued to increase slightly compared to previous years (2019: 16%, 2018: 13%). About two thirds of all female employees work in IT Professions. The average age of GFT employees is 38 (women: 37 | men: 38).



### Women in the GFT Group

| Composition of female work force in % | 2020 | 2019 | 2018 |
|---------------------------------------|------|------|------|
| IT- Professions                       | 65   | 64   | 65   |
| Consulting                            | 9    | 9    | 8    |
| Corporate Services                    | 26   | 27   | 27   |

By providing good framework conditions, we aim to ensure that our employees can perfectly **reconcile their professional and private lives**. This also includes flexible working time models as well as career planning tailored to the employee's current life situation.

Due to varying national regulations, there is no Group-wide health management programme, but all national companies offer **health-related measures**, such as subsidies for insurance plans, check-ups, medical services and offers for external sports facilities.

We are convinced that practised diversity is an expression of **equal opportunities** (SDG 5 Gender Equality, SDG 10 Reduce Inequalities) and that this is the decisive key to our business success. The basis is mutual trust and respect – as reflected in our corporate values. We do not tolerate any form of discrimination,



bullying or harassment. We raise awareness of this issue among our managers by providing training on cross-cultural skills. Any employees with grievances can also report them to our internal complaints offices. In the reporting period, no cases were reported within the Group. In order to emphasise that GFT does not tolerate any gender-based discrimination, the term 'gender' was expanded to 'gender identity or its expression' in our Code of Conduct. As in previous years, the GFT logo was displayed in rainbow colours on all social media channels during Pride Month in June. In a [personal message to staff on gft.com](#), CEO Marika Lulay underlined the company's goal of creating an even more inclusive and diverse corporate culture and promoting equality in the workplace around the world.

The diversity concept for the Administrative Board and the Managing Directors is included in the [Corporate Governance Statement](#) for the GFT Group and GFT Technologies SE.

**Employee representatives** are an important internal stakeholder. Due to its legal form, GFT Technologies SE has an 'SE works council' that represents employees in the member states of the EU. Representatives at the various national companies of the GFT Group may consist of both trade union representatives and company representative bodies. Worker co-determination is governed by the respective national regulations. In some cases, national companies have collective bargaining agreements and/or company agreements.

## Remuneration

In addition to basic salary, remuneration also includes location-specific employer benefits. The remuneration amount depends on the particular activities, function and responsibility of the employee. In 2020, **personnel expenses** of the GFT Group amounted to € 320.39 million (2019: €297.33 million | 2018: €268.18 million).

With effect from 1 January 2020, the Administrative Board resolved a **further development of the compensation system** for the Managing Directors. For service agreements concluded from 2020 onwards, annual performance-based remuneration now includes – in addition to growth and profit targets – a socially or ecologically oriented sustainability target, which is set annually by the Administrative Board. Details on the compensation system for the Administrative Board and the Managing Directors can be found in the remuneration report in the combined management report.

## Risks

We regard demotivation (e.g. as a result of activities that are permanently over- or under-demanding, a lack of promotion, a poor work-life balance, inadequate remuneration, a lack of transparent communication and/or a disrespectful corporate culture) and health issues (due to ergonomic and psychological complaints) up to and including occupational disability as significant risks. Such effects may be significant in certain cases. GFT has established systematic precautionary measures. The management teams of GFT companies are in permanent contact with employees and their representatives. The occurrence of such risks is therefore relatively unlikely. Overall, we assess the risk as medium.





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# Environment

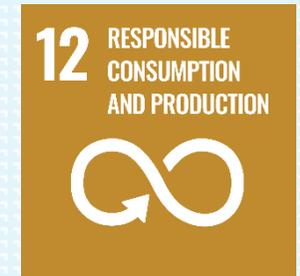


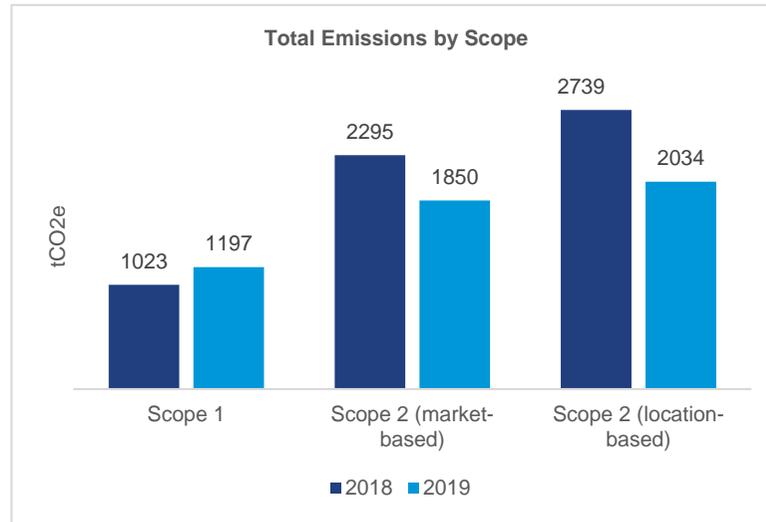
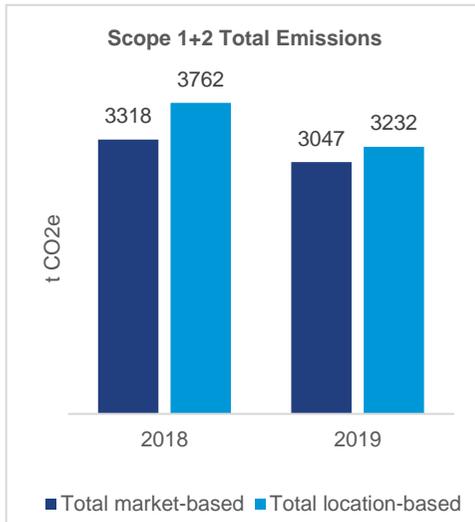
## 5 Environment

In our sustainability strategy, we are committed to integrating environmental responsibility into our business activities. With regard to the management of our own operations, we focus on SDG 13 (Climate Action). The basis is the [Group Environmental Policy](#) and the key fields of action procurement, IT infrastructure, travel management and facility management. In the case of procurement, for example, price, quality and environmental aspects are regarded as equally important criteria. In the case of business trips, staff must consider environmental aspects, cost efficiency and travel time. Energy efficiency plays a central role in IT procurement and operation (equipment, architecture) and in renting office space.

In the reporting period, we compiled a Corporate Carbon Footprint. Greenhouse gas emissions were calculated on the basis of energy and fuel consumption. The calculation complies with the requirements of the [Greenhouse Gas Protocol \(GHG Protocol\)](#) accounting standard for greenhouse gas emissions, using DEFRA emission factors for direct emissions. To define the organisational boundaries, we follow the operational control approach. We use Scope 1 (direct emissions) and Scope 2 (purchased emissions) to calculate the energy consumption of our various sites and the fuel consumption of our company vehicles. The data set comprises the years 2018 and 2019 for the five national companies with the largest headcount (> 80% of the GFT work force). At the time the report was prepared, the consumption statements for the 2020 financial year were not yet available.

Under the GHG Protocol, Scope 2 emissions from electricity consumption are calculated separately according to location-based and market-based emission factors. The location-based method takes into account the average emission factors for a specific geographical region (for example, a country). The calculation of location-based greenhouse gas emissions applied here is based on the factors for the generation mix of the European transmission system operators or the Climate Transparency Report for Brazil. For the market-based factors, the specific electricity mix of a company is used – wherever possible – based on the actual emissions generated by the energy producer. If no supplier factor is available, the so-called residual mix is used.



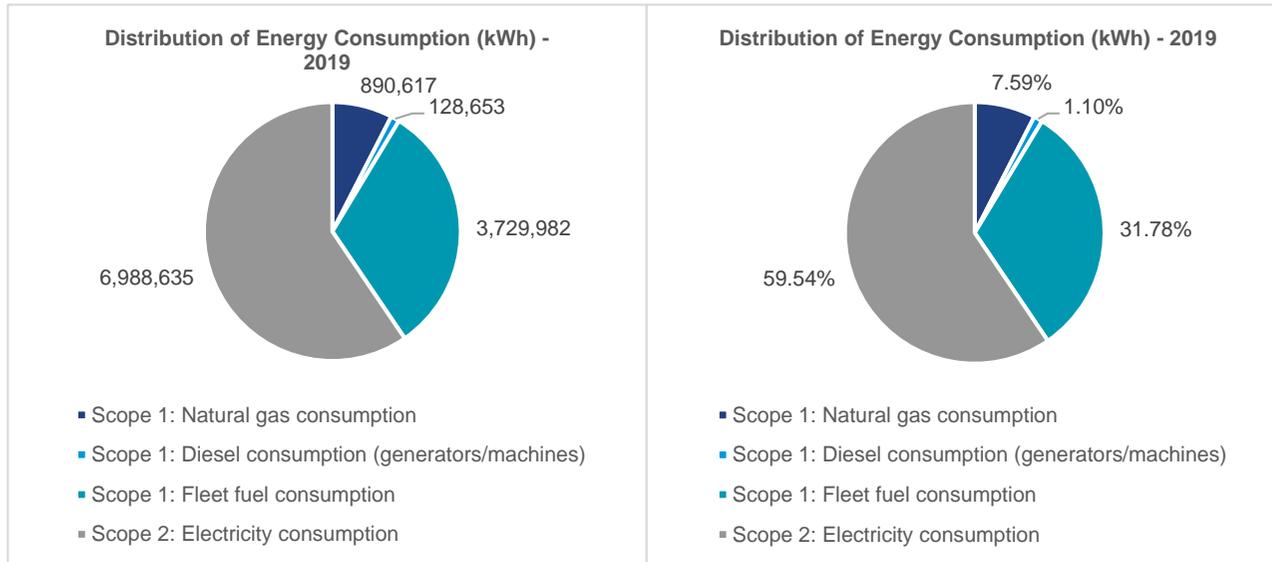


Note: Figures for Brazil, Germany, Italy, Poland and Spain are included; they cover more than 80% of the GFT work force. The figures are partly based on estimates or projections. 'Market-based' takes into account emission factors of an electricity supplier or electricity product, 'location-based' takes into account the average emission factors of the countries.

The main emission drivers for Scope 1 are the fuel consumption of our vehicle fleet and for Scope 2 our electricity consumption. In the case of electricity consumption, office buildings account for around 93% and the two internal data centres in Germany and Spain for 7%. Our facilities in Brazil already purchase 95% of their electricity from renewable sources and some of our Italian facilities already purchase 100% of their electricity from renewable sources.

| Consumption figures, market-based                            | 2019    | 2018    |
|--|---------|---------|
| Electricity consumption, office buildings (tCO2e)            | 1,726.9 | 2,128.3 |
| Emissions from electricity consumption, data centres (tCO2e) | 122.7   | 167.1   |
| Emissions per full-time employee (tCO2e/FTE)                 | 0.7     | 0.7     |
| Emissions per million euros of revenue (tCO2e/€ million)     | 9.1     | 9.8     |





Note: Figures for Brazil, Germany, Italy, Poland and Spain are included; they cover more than 80% of the GFT work force. The figures are partly based on estimates or projections.

## Environment-related risks

We do not operate any production facilities and use very few resources. We assess the impact of our business activities on the environment as insignificant, and we also assess the occurrence of ecological risks as relatively unlikely. We therefore assess environmental aspects as a low risk.

With regard to our core business, we have addressed the question of how our software solutions can make a contribution to sustainable products (SDG 12) by means of technological innovation (SDG 9). In response to a proposal made by our IT architects and developers, the 'GreenCoding' initiative was launched: Programming is typically about efficiency, but not energy efficiency. Scaled up to servers and end devices worldwide, every line of code has the potential to reduce energy consumption and thus emissions. GreenCoding is the ecological component for our sustainability goal "Sustainability by design". The architectural principles of resource-oriented programming were conveyed via internal news reports and podcasts, and a training programme on this topic will commence in 2021. The white paper [„Climate change: How GreenCoding makes a difference!“](#) was published in spring 2021.





# 6 Social commitment



## 6 Social commitment

We provide local support in the vicinity of our sites in the fields of technology development and education. As an employer, we are also actively involved in local economies. At many of our locations, GFT employees provide support for charitable initiatives, in the reporting year, this included more than 30 projects. An overview of our memberships in local business and industry associations can be found on our website [www.gft.com/sustainability](http://www.gft.com/sustainability) > [social commitment](#).

GFT did not make any financial or non-financial political contributions in the reporting period.

In 2020, a Group tax guideline was developed on the basis of our corporate values and in accordance with our Code of Ethics and Code of Conduct, which defines the most important corporate tax principles (e.g. tasks and responsibilities for all GFT companies, internal control system, compliance with all regulatory provisions, internal transfer prices, no aggressive tax optimisation). The effective tax rate in the 2020 financial year was 30% (2019: 27%), despite realised tax benefits for research and development activities. The year-on-year increase in the calculated tax rate was mainly due to the distribution of results among the national companies.

### Technological development and responsibility

In response to the need for a sustainability-oriented society based on solidarity, we are committed to the responsible and ethical development and application of technologies in accordance with our sustainability goal 'Sustainability by design'. This is our contribution to SDG 9 (Industry, Innovation and Infrastructure) and SDG 17 (Partnerships for the Goals). We have enshrined our principles in the internal guideline 'Algorithmic Transparency and Accountability'. In this way, we support SDG 16 (Peace, Justice and Strong Institutions).

Our approach is 'privacy by design'. This means that all data protection requirements are integrated into our IT systems from the very beginning, i.e. during the design process. A new training course aims to make software developers more aware of the principles of data economy and data avoidance and to provide them with comprehensive knowledge on how to deal with data protection risks when using future technologies and in complex IT projects. Following pilot training sessions in 2019, the first 'generation' of GFT Privacy Engineers completed their course in the reporting period. This training provides comprehensive skills in dealing with data protection risks in the application of future technologies.



At a [virtual GFT London meetup](#), the topic of discussion was the human nature of technology. Among other things, participants discussed the role of user experience and how tech companies can ensure that the technology they develop is more people-centred ('humane technology').

## Education

'Grow tech talent worldwide' – in line with SDG 4 (Quality Education), we promote IT talent with various measures, such as university partnerships, coding workshops and hackathons. In the reporting period, we supported more than 40 initiatives in this area, these measures also included the organisation '[Mon avenir TI](#)' for the promotion of IT career opportunities in the Quebec region of Canada and a cooperation with the Quebec-based IT training programme '[Quebec 42](#)'. In Italy, there were virtual workshops for students on artificial intelligence and blockchain.

We want to improve the future prospects of young people by helping them enter the technology industry: in 2020, GFT's global team included 68 interns, apprentices, trainees and students (2019: 103, 2018: 80, 2017: 65) – corresponding to 1% of our total work force (2019: 2%, 2018: 2%). In Brazil, 90 interns took the opportunity to learn the Java and .Net programming languages in a three-month training course.

We address SDG 5 (Gender Equality) by participating in initiatives specifically for girls and young women. In 2020, for example, GFT participated in virtual events of the STEM (Science, Technology, Engineering, and Mathematics) platform 'STEM Women' in the UK and the two-day conference for female software developers 'DevDay4Women' in Mexico. As part of the '10000 heures de code ensemble' programme, GFT Canada supported a coding workshop for girls at a primary school in Quebec and GFT Spain was involved in various initiatives, including 'Technovation Girls', a mentoring programme focusing on technology and IT for girls aged 10 to 18.

## Risks

We assess the negative impact of our business activities and social commitment on society as insignificant and the occurrence of society-related risks as relatively unlikely. We therefore assess social risks as low.





7

# Respect for human rights



## 7 Respect for human rights

The Group's duty of care to protect human rights is anchored in our [Code of Ethics & Code of Conduct](#). We are committed to upholding, supporting and respecting the internationally proclaimed human rights in accordance with the 'Universal Declaration of Human Rights', the 'OECD Guidelines for Multinational Enterprises', the 'UN Guiding Principles on Business and Human Rights' and the '10 Principles of the UN Global Compact'. GFT joined the UN Global Compact in 2019.

We support SDG 8 (Decent Work and Economic Growth) and SDG 16 (Peace, Justice and Strong Institutions) with the following measures:

GFT complies with internationally recognised standards and, in those countries where we have facilities, with the nationally applicable labour and social standards.

GFT has a global data privacy framework based on a Group-wide data privacy policy with consistent levels of data protection that complies with legal requirements. Under the leadership of the Chief Privacy Officer (CPO), GFT operates a Group Data Protection Network consisting of data privacy officers for the individual national companies and for the various corporate functions. The aim of this data protection organisation is to ensure uniform data privacy practices across the Group and at the interfaces with clients, partners and suppliers. We respect the right to privacy of our employees. This is regulated in our 'Data Privacy Policy for Handling Employee Data', which is part of the overarching Group Data Privacy Policy.

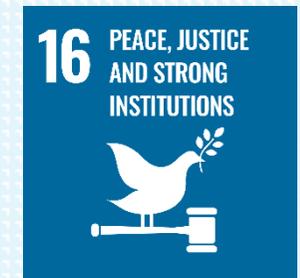
[The terms and conditions of the GFT Group](#) include a code of conduct for suppliers and service providers with the following obligations:

- Respect international human rights
- Forbid child labour
- Care for the health and safety of employees
- Comply with legal obligations regarding the minimum wage
- Adhere to all legal regulations.

If there is any suspicion, GFT is entitled to conduct supplier audits. In the case of violations, we are entitled to terminate the business relationship immediately.

### Human rights-related risks

We assess the occurrence of human rights violations resulting from our business activities or in connection with the services we provide as relatively unlikely. We consider the impact to be insignificant. We therefore assess the overall risk of human rights violations as low.





# 8

# Compliance



## 8 Compliance

We regard integrity as a crucial prerequisite for long-term success. Our 'Code of Ethics & Code of Conduct' comprises the ethical standards and rules of behaviour throughout the GFT Group and is our contribution to SDG 16 (Peace, Justice and Strong Institutions).

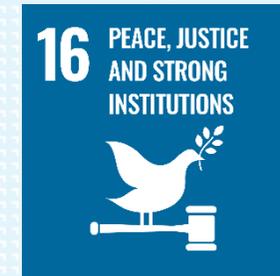
### Compliance Management System

The Compliance Office appointed by the Administrative Board is responsible for Group-wide implementation of the Compliance Management System.

The Group-wide compliance-related guidelines are available in several languages via the intranet. There is a mandatory online training course for all employees that covers all compliance-relevant areas and is now available in four languages. In addition, the Compliance Office provides training for relevant groups of employees as needed.

Employees are encouraged to report violations of laws and Group policies. In the event of suspected misconduct, the Compliance Office leads the investigation. Various communication channels are available for reporting (in writing, by email, by telephone, online). Since the end of 2020, employees in Germany have also been able to use the web-based whistleblowing tool offered throughout the Group; in order to dispel the concerns that had previously existed, the Works Council agreed to the introduction by means of a pilot phase (initially until 31 December 2021).

In addition to regular monitoring of existing business relationships, new business partners are also reviewed on a risk basis. As in previous years, there were no legal proceedings in 2020 due to anti-competitive behaviour or the formation of cartels and monopolies.



## Anti-corruption and bribery

With regard to bribery and corruption, we pursue a zero tolerance approach as set out in our 'Anti-Bribery & Corruption Policy'. Together with our Code of Ethics & Code of Conduct, this policy is published in [German](#) and [English](#) on our website. We also expect our suppliers to comply with these guidelines.

In certain high-risk situations, such as invitations from business partners, prior approval must be obtained from the Compliance Office under specified conditions in order to avoid corruption and bribery.

The Compliance Office did not receive any reports of corruption and bribery violations in 2020.

## Imprint

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## Risks relating to anti-corruption and bribery

As the corresponding policies and approval processes are valid throughout the Group, we have defined a uniform framework and prevented any scope for interpretation. We assess the effects of corruption and bribery as moderate. Due to the measures described, we assess the occurrence as relatively unlikely. The risk is therefore low.

