

GFT Group

Corporate Social Responsibility Policy



Contact:

csr@gft.com

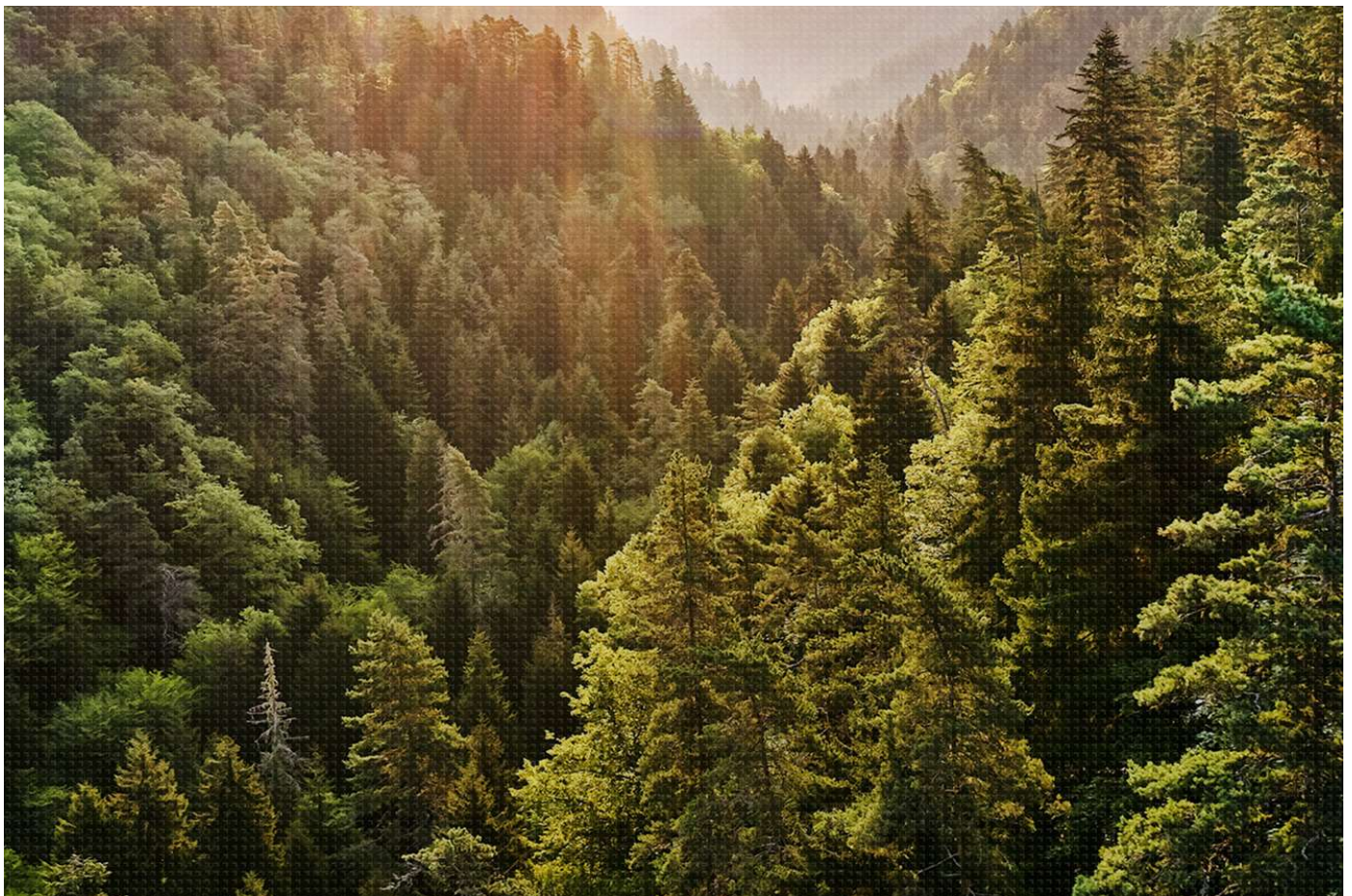
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Document Summary

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1 Introduction

Corporate Social Responsibility (CSR) is the contribution we, the GFT Group, make to sustainable development. We regard sustainability as an integral part of our business model and our corporate strategy. “Sustain-ability” is the way we respond and adapt to environmental, social and governance (ESG) challenges.

Sustainable management means for us:

- **creating shared value for GFT, our stakeholders and society,**
- **value protection through avoiding negative impacts on business as well as negative impacts of our business activities on society.**

As a digitalisation partner for our clients, we help companies make their business models fit for the future. At the same time, our social responsibility to adequately assess the long-term consequences of the solutions we develop is rooted in our focus on technology. Technology should always be people-centred ('humane technology'), this is why GFT is fostering tech talents – within and outside the company. Sustainable software design is combining resource efficient programming (GreenCoding) and privacy engineering right from the scratch. Our sustainability strategy is a clear commitment to our stakeholders, environment and society.

2 Scope

Sustainability is an integral part of our business model and the strategy of the GFT Group. The Corporate Social Responsibility (CSR) policy of GFT Group is part of the strategy and as such binding for all GFT Group Companies and all their employees. The GFT CSR Policy supplements all existing global and local policies regarding environmental aspects. Provisions in global or local policies are adhered to where there local laws/regulations require GFT to do so.

This document describes GFT's contribution to the United Nations Sustainable Development Goals (SDGs) applicable to GFT Technology business model.

2.1 CSR-related complementary documents and policies

There is a set of complementary documentation (guidelines, reports and policies) regarding GFT's **CSR agenda:**

CSR Governance

- CSR Governance role concept
- Group CSR Committee structure

Risk Management

- Risk Management Guideline

Environment

- GFT Group Environmental Policy

Employees

- Code of Ethics & Code of Conduct
- Diversity & Inclusion Policy
- GFT Group Data Protection Guideline for Whistleblowing

Social Commitment

- Donation & Sponsoring Policy
- Business Benefits Policy

Human Rights

- GFT Group Data Protection Policy
- GFT Group Data Protection Guideline for Retention and Disposal of Personal Data
- GFT Group Data Protection Guideline for Employee Data Handling
- GFT Group Data Protection Guideline on Algorithmic Transparency and Accountability
- Code of Conduct for Suppliers (as part of GFT's Purchasing Terms and Conditions)

Anti-Bribery & Anti-Corruption

- Anti-Bribery & Corruption Policy (ABC-Policy)

Public disclosures

- [Non-financial group report](#)
- [GRI content index, GRI key figures](#)
- [CDP Climate Change](#)
- [Gaia Rating](#) (EthiFinance subsidiary, focus on ESG performance of small and mid-caps in Europe)
- [ISS ESG Corporate Rating](#)
- [S&P Corporate Sustainability Assessment](#)
- [UN Global Compact Communication on Progress](#)
- [Memberships](#)
- Ecovadis
- [Sustainalytics](#)

3 Policy

3.1 Definition

GFT Group follows the 2030 Agenda for Sustainable Development, adopted by all United Nations Member States in 2015, which provides a shared blueprint for peace and prosperity for people and the planet, now and into the future. At its heart, are the **17 Sustainable Development Goals (SDGs)**, which are an urgent call for action by all countries - developed and developing - in a global partnership.

Our understanding of sustainability:

- For us, sustainability means achieving long-term profitable growth.
- We can only be successful if we take due account of the needs and expectations of our stakeholders. The most important stakeholders are our clients, employees and shareholders, as well as our suppliers and partners.

- GFT “produces” intangible assets: IT services. In this knowledge-based production process, the most important resources are our employees, our intellectual capital, and the trust placed in us by our stakeholders.
- We want to shape the digital transformation in a responsible and proactive manner. As a technology company, we assume a special responsibility for society: raising awareness in public discussions for the safe and ethical use of information technologies. GFT and its employees support various target groups within the global tech community and across company boundaries in order to enhance their technology skills and thus improve their future opportunities.
- We have integrated environmental, social and governance (ESG) aspects into our core business and management systems.

3.2 Sustainability strategy and CSR goals

We regard sustainability as the responsibility of our business and social environment. We want to shape the digital transformation in a responsible and proactive manner. Therefore, CSR is **anchored in our vision, in our mission, and especially in our five core values (5 Cs)** – the basis for all dealings with clients and business partners, as well as for our daily interactions with each other.



The five GFT corporate values

GFT Group conducts a **materiality analysis** that identifies a) aspects of our business operations that have a significant impact on sustainability issues and b) what material impact sustainability issues have on our operations. As system boundaries we chose the GFT Group as well as parts of its supply chain. The analysis is reviewed on an annual basis.

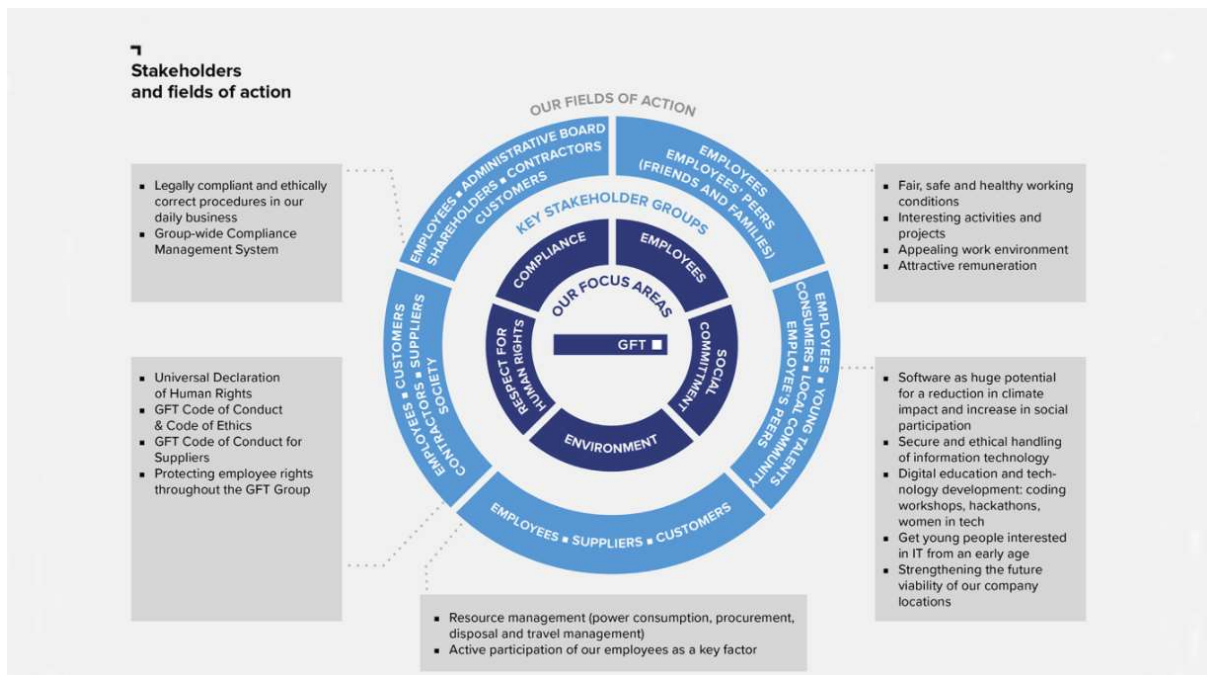
Essential parts of the analysis are:

- **Stakeholders** (direct and indirect) and their key issues and expectations.
- Consideration of environmental, social and governance (**ESG**) factors being identified as risks or opportunities for the GFT Group.
- Consideration of our **added value** with regard to sustainability aspects.

Sustainability aspects are considered to be significant, if they directly or indirectly influence the financial results, the reputation of the company and its resources. Equally, we also consider the direct and indirect effects of our business activities on all selected sustainability aspects. Significant sustainability aspects are:

- **Corporate Governance** (integration of sustainability aspects into the management systems)
- **Structured innovation management** (integration of saving resources and ethics into software design processes, promotion of employee initiatives)
- **Employees** (interesting activities and projects, appealing work environment, attractive remuneration)
- **Social commitment** (digital education, technology development)
- **Supply chain** (social and environmental criteria)
- **Environmental efforts** (climate neutral business operations, energy and resource management).

3.3 Stakeholder dialogue



We can only be successful if we take due account of the needs and expectations of our stakeholders. Direct stakeholders are derived from our business model and the company form: our clients, employees and shareholders, as well as our suppliers and partners. In addition, there are indirect stakeholder groups that are in contact with our direct stakeholders. This also establishes relationships with numerous indirect stakeholders.

We are actively engaged in a continuous and open dialogue with the different stakeholder groups to learn about their relevant topics, expectations and needs. To this end, we regularly update our stakeholder analysis. The following were defined as overarching stakeholder groups:

- Our own organisation
- Capital market/shareholders
- Value chain
- Political environment/regulators
- Public
- Audit partner

Within each category there are several subgroups. Based on existing dialogue formats and contact opportunities, the key topics and concerns were identified for each subgroup.

3.4 CSR Group governance

3.4.1 Responsibility

The Administrative Board (AB) of GFT Technologies SE is responsible for the corporate strategy and all major decisions, including fundamental sustainability and CSR-related issues. The Group Executive Board (GEB) is responsible for day-to-day sustainability and CSR-related operations. The Managing Directors of GFT Technologies SE are responsible for the preparation of the annual non-financial group report.

GFT ESG/CSR Governance structure



3.4.2 Role concept

- **The Administrative Board (AB)** is responsible for the corporate strategy. It takes ecological and social objectives into account in an appropriate manner. It systematically identifies and assesses the risks and opportunities associated with social and environmental factors, as well as the ecological and social impacts of the company's activities. In addition, the AB conducts a review of the annual non-financial group report.
- **The Group Executive Board** is responsible for the execution of the Group's CSR strategy and CSR-related policies. The body defines detailed KPIs for the sustainability aspects and monitors the progress. The GEB consists of the Managing Directors of GFT Technologies SE, the Regional Managers, and the Group Chief Operating Officer (COO).
- **The Group CSR Committee** is a global and cross-functional committee that meets three times a year to review progress on the Group CSR agenda and discuss strategies to support sustainability goals. The composition of the committee members reflects the needs of our main stakeholders in order to enhance the reporting and analysis of our CSR goals and initiatives. The Committee Chair, GFT Group CEO, provides an update to the Administrative Board and the Group Executive Board on the status of the sustainability process, actions taken by the Group CSR Committee, and the latest public ESG scorings.
- **The Group CSR Work Streams** are responsible for running the Group's strategic sustainability activities, developing and introducing relevant CSR aspects into processes and our core business. They are supported by the Group CSR Manager, the Group CSR Governance Manager and Local CSR Representatives.
- **The Group Senior Manager ESG** drives, with the GEB, the CSR goal setting, strategy development and best practice, by consulting the group based on external market trends/regulations. He/she is responsible for sustainability reporting and ESG disclosures, supported by Group Legal to ensure compliance with legal requirements and by COO Office with necessary data and quality management. Focus is on regulation, capital market and communications. A contact person for ESG related requests. Close cooperation with all CSR functions within the Group.
- **The Head of Group ESG/CSR Governance** is a contact person for all central and operational units regarding CSR-related issues. Serving as a central information gathering point for all group-wide CSR activities. Co-ordinating all data management across GFT. He/she is supported by the Local CSR Representatives and works closely together with all CSR functions within the Group.
- **The Local CSR Representative** is a local single point of contact for the Head of Group ESG/CSR Governance and the Group Senior Manager ESG regarding CSR-related issues. He/she serves as a local information gathering point for all group-wide CSR activities.

3.5 ESG & sustainability reporting

On the part of various stakeholders, the demand for detailed information on sustainability progress and managing ESG factors (environment, social, governance) is steadily increasing. We offer comprehensive information at our website. Furthermore, GFT is actively participating in selected ESG ratings.

The legally required **non-financial group report** is published each year as part of the management report, available at www.gft.com/sustainability. The Administrative Board is obliged to conduct a content level review; results need to be presented to the Annual General Meeting.

3.6 ESG Risk Management

The assessment of ESG risks is an integral part of the overall risk assessment of the GFT Group. For all material topics, a regular ESG risk assessment is carried out regarding the likelihood and extent of the negative effects. The classification takes place as part of group-wide risk management.

4 Fields of action

The fields of action describe how the GFT Group achieves their CSR objectives. GFT Group contributes to 9 United Nations Sustainable Development Goals (SDGs) applicable to its business model: provision of IT services. In this knowledge-based production process, the most important resources are our employees, our intellectual capital, and the trust placed in us by our stakeholders.

As a group of companies, the GFT Group can only be successful, if all employees participate in this process actively. We therefore raise the awareness of the social responsibility of all employees.



As a technology service provider, our CSR strategy focuses on sustainability in software design and the development of specialists with technological expertise. Responsible corporate governance is the foundation for our business activities:

- The **sustainability by design** objective has an ecological component with the resource-oriented programming approach ‘GreenCoding’ and an ethical-legal component with the principles of ‘Privacy by Design’ for software development and the application of technologies.
- Our **grow tech talent worldwide** objective is aimed at promoting IT talent both externally and internally. Across company boundaries, GFT is committed to supporting various target groups within the global tech community in order to improve their future opportunities through the development and expansion of technology skills. Internally, we attach great importance to developing our employees in order to position GFT as effectively as possible in the competition to attract highly skilled professionals and talented junior staff. A working environment based on diversity, equality and mutual respect is an integral part of our DNA.
- Our **resilient management systems** objective is based on the concept of sustainability in corporate governance. For us, this means achieving long-term profitable growth in compliance with applicable law and fair market conduct – in harmony with our ecological and social objectives and together with our stakeholders.