

# SPEAKUP POLICY FOR SPAIN

Version 2, English  
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# 1 About SpeakUp

## 1.1 Introduction

### 1.1.1 Purpose

Capgemini, right from its inception, has always strived to be an ethical and humane company whose most important asset is its people. And this was always very strongly underpinned by Serge Kampf, our Group's founder. To reinforce and continue this ethical journey and ensure that Capgemini remains a workplace where team members grow and feel valued in a fair and open working environment, we have a leading-edge ethics concerns reporting and incident management tool called "SpeakUp". The SpeakUp helpline has been implemented by Capgemini to uphold its Values and protect its ethical culture; it also helps meet legal requirements in jurisdictions which have whistleblowing regulations.

SpeakUp is a voluntary, confidential web and phone-based intake system operated by Convercent, an independent service provider, and provided by Capgemini to its employees, external consultants, contractors, agency staff, customers, suppliers and business partners and those of its affiliates, among others ("reporter").

SpeakUp is a commitment from Capgemini: to listen to your voice when you raise it in good faith; to be fair when investigating a concern, respect organizational justice, maintain confidentiality; and to protect you from any form of retaliation; a commitment which is endorsed by all members of the Board of Directors of Capgemini SE and members of the Group Executive Board (GEB) as part of their individual and collective support to the provisions of the Code of Business Ethics.

### 1.1.2 Scope

Communications may be raised for any actions or omissions that may constitute:

- Breaches of European Union Law related to public procurement; financial sector; prevention of money laundering or terrorist financing; product safety and compliance; transport safety; protection of the environment; radiation protection and nuclear safety; food and feed safety, animal health and animal welfare; public health; consumer protection; protection of privacy and personal data, and security of networks and information systems, financial interests of the Union and internal market, among others.
- Criminal offences or serious or very serious administrative breaches, including those involving financial losses for the Public Treasury and the Social Security.
- Infringements of Labour Law in matters of safety and health at work.
- Violations of the Capgemini Code of Business Conduct or any other internal policy or procedure implemented.

If your communication pertains to a matter that, under local law, may not be accepted by Capgemini through SpeakUp, please contact your team leader, Ethics & Compliance Officer or a representative of the Human Resources department to report the matter.



SpeakUp is not a grievance helpline. It is not a platform to raise HR-related issues such as, but not limited to, performance review, compensation, career development and other topics of similar nature. For such issues, local grievance channels should be used.

## 1.1.3 Benefits

SpeakUp provides a simple, safe and centralized incident management system to present your reports. Additionally, it:

- makes presenting communications easy: anytime, anywhere, and in any language;
- ensures confidentiality and allows anonymity;
- promises prompt and systematic investigation along with time-bound and effective resolution;
- assures fairness and organizational justice and protection from retaliatory action; and
- gives an accurate overview of the ethics culture to top management.

You may contact Capgemini with any questions relating to this policy and/or the SpeakUp helpline by writing to [ethics@capgemini.com](mailto:ethics@capgemini.com).

## 1.2 Use of SpeakUp

If the communication is raised by means other than SpeakUp, whoever receives it is obliged to immediately forward it to the Internal Information System Manager, as well as to ensure the confidentiality of the communication. Failure to do so may entail legal consequences and result in disciplinary action for a very serious breach.

Please be aware that the information you supply about yourself, your colleagues, or any aspect of the company's operations may result in decisions that affect others. Therefore, we ask that you only provide information that, to the best of your knowledge, at the time that the information is provided, is correct and factual. You will not be subject to disciplinary or adverse action by Capgemini for any report of a suspected legal or compliance violation that is made in "good faith", even if it later turns out to be incorrect. Acting in "good faith" means acting with an honest belief and intention. Please be aware, however, that knowingly providing false or misleading information will not be tolerated. Further, if it is determined that the reporter has not acted in good faith (i.e. the communication reported is found/known to be malicious or false), disciplinary action(s) may be taken against such reporters.

The information you submit will be treated confidentially except in cases where this is not possible because of legal requirements or in order to conduct a proper investigation; in any case all information will be handled sensitively.

SpeakUp allows anonymous reports. Even if you choose anonymity (partial or full), you can still opt to receive notifications about the communication by providing an email address and using your own login credentials (unique reference number which would be known only to you) that is associated with the communication:



- to track the progress of the communication.
- to respond to any questions received from the investigation team.

Although the dedicated investigation team will be able to communicate with you, using the 'Message' feature of the helpline, to seek additional information about your communication, they will not be able to identify you (even if you have provided your email address to receive notifications). Further, the investigation team's ability to address the concern largely depends on the information provided by you in the communication and your willingness to provide responses to any additional information requested by them; you are therefore requested to regularly login to SpeakUp to follow the status of your communication.

You can present a communication or submit a question through SpeakUp by either visiting the [SpeakUp](#) portal or by using the local SpeakUp phone number available on the portal.

## 1.3 Management of communications

Once a communication is presented raised in the SpeakUp helpline, auto generated messages will be sent to (i) you, acknowledging receipt of the communication and (ii) Capgemini's Group Ethics Office notifying receipt of the communication. Group Ethics Office shall perform preliminary assessment of the communication to determine the appropriate course of action and your communication will accordingly be assigned to the Responsible of the System for processing it and, where appropriate, carry out an investigation.

All communication reported in SpeakUp will be dealt with thoroughly and as soon as reasonably practicable, taking into account the complexity and the nature of the communication. The dedicated team investigating the communication has the ability to reach out to the reporter (whether known or anonymous) to seek further information by asking follow-up questions using the 'Message' feature in SpeakUp. All involved stakeholders are required to cooperate during any investigation by providing requested information; failure to cooperate with an investigation is grounds for disciplinary action.

The reporter would be notified when the communication has been closed under SpeakUp; details in relation to outcome of the investigation will not be shared with the reporter considering Capgemini's obligation to keep the contents of the communication confidential.

In cases where there is a legal obligation to communicate the information to public bodies responsible for the prosecution of crimes or otherwise having jurisdiction over the matter, the dedicated team will contact the relevant competent authority having jurisdiction over the matter.

## 1.4 Non-Retaliation

Capgemini encourages a culture of openness where reporters can raise their genuine concerns regarding Capgemini's business practices in good faith and without fear of retaliation. Creating a safe and supportive environment where employees' views are respected, will allow employees to take personal responsibility for ensuring that our conduct is aligned with our Values and our Code of Business Ethics. It is crucial that employees who, in good faith, want to raise a communication or seek advice and guidance on an ethics or compliance communication, feel able to do so without fear of retaliation; "good faith" means that employees must act with an honest belief and intention.



The Group prohibits retaliation against anyone for raising or helping address a communication. Any form of retaliation is grounds for disciplinary action, up to and including dismissal in accordance with the applicable legislation.

If you witness or face any retaliation, it is important that you report it immediately; contact us through the 'message' functionality on SpeakUp portal or by writing to us at [ethics@capgemini.com](mailto:ethics@capgemini.com).

## 2. Communications Management Procedure

In accordance with Spanish Law 2/2023, of 20 February on the protection of persons who report regulatory offences and the fight against corruption, Capgemini has a Procedure regarding the Management of Communications that establishes (i) the guidelines to follow when submitting a communication about ethic concerns regarding potential irregularities or non-compliances and/or non-compliances related to the matters included in Scope Section of this Policy, as well as (ii) the procedure to be followed by Capgemini when receiving and managing the communications submitted through SpeakUp. You can access the Procedure through the following link: [Communications Management Procedure](#).

## 3. Data Protection

The personal data you provide, as the informant, at the time of submitting the communication through the SpeakUp helpline, as well as data from those of any employee or collaborator of Capgemini España, S.L. or any other Capgemini Group entities, and/or third parties or any other personal data will be processed in accordance with the provisions of this [Privacy Notice](#).



## About Capgemini

Capgemini is a global leader in partnering with companies to transform and manage their business by harnessing the power of technology. The Group is guided everyday by its purpose of unleashing human energy through technology for an inclusive and sustainable future. It is a responsible and diverse organization of over 360,000 team members more than 50 countries. With its strong 55-year heritage and deep industry expertise, Capgemini is trusted by its clients to address the entire breadth of their business needs, from strategy and design to operations, fueled by the fast evolving and innovative world of cloud, data, AI, connectivity, software, digital engineering and platforms. The Group reported in 2022 global revenues of €22 billion.

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