

Transparency Statement

This Transparency Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps Capgemini UK plc has taken to detect and prevent slavery and human trafficking in its organisation and supply chain. It constitutes Capgemini UK plc's Transparency Statement for the financial year 2020.

Introduction

“ As an honoree for a ninth consecutive year Capgemini has continued to demonstrate unwavering commitment to the highest values and positively impacting the communities it serves. Congratulations to everyone at Capgemini for earning the World’s most Ethical Companies designation. ”

Timothy Erblich
CEO, Ethisphere Institute

The Capgemini Group has a zero-tolerance approach to bribery, corruption and human rights abuse. It is a fundamental belief of the Capgemini Group that there is no place in today’s modern businesses and supply chains for human rights abuses such as forced and compulsory labour, slavery, servitude, and human trafficking.

In 2021, the Capgemini Group was named as one of the World’s Most Ethical Companies® by the Ethisphere Institute for the ninth consecutive year. This highlights our long-term commitment to ethical business practices; and we are one of only 4 honourees in the Consulting Services industry. In 2021, 135 organisations were recognised spanning 22 countries and 47 industries.

Our pledge to conduct our business in an ethical and responsible way is crucial to our continued success as a business. It is essential for building trust with clients, shareholders, suppliers and business partners. It also matters to our people, who want to work for an organisation with a strong, uncompromising ethical stance. Responsible business practices permeate through every aspect of our organisation, from the way we look after and encourage our employees, to our sustainable procurement practices and, the steps we take to minimise the environmental impact of our business and our clients’ businesses.

We can never guarantee that our business and supply chain is completely free of modern slavery, however we are committed to taking appropriate steps to do what we can to detect and prevent any forms of slavery in our business and supply chain.

This Transparency Statement describes our business and supply chain, our policies covering ethical behaviours, and our standards. It also sets out the steps we are planning to ensure continuous improvement.

“ We are immensely proud of our continued global recognition for a ninth consecutive year as one of the world’s most ethical companies. I continue to be committed to ensuring our unambiguous compliance to the Modern Slavery Act. This is exemplified by our sustained commitment to being vigilant, diligent and dedicated to the continuous improvement programme to detect and prevent modern slavery throughout our business and supply chains ”

Paul Margetts
Managing Director, Capgemini UK plc and Chair of the UK Country Board

About Capgemini's business and supply chains

“ At Capgemini, our Values and Ethics are embedded in everything we do. Our central team, supported by a worldwide network of ethics officers, works continuously in this area, making us one of the World's Most Ethical Companies™. Capgemini is proud to be trusted as an employer of choice, and a responsible player in the eyes of our stakeholders and the wider community ”

**Anne-Violaine
Monnie-Agazzi**
Group Ethics Officer

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 organisation of over 270,000 team members in nearly fifty countries. With its strong heritage of over fifty years 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, fuelled by the fast evolving and innovative world of cloud, data, AI, connectivity, software, digital engineering and platforms.

The Board of Directors sets the strategic direction of the Company and the Capgemini Group. It appoints the executive corporate officer(s) responsible for implementing this strategy, approves the financial statements, convenes the Shareholders' Meeting, and proposes the annual dividend. It takes decisions on the major issues concerning the day-to-day operation and future of Capgemini, to promote sustainable value creation for its shareholders and all stakeholders.

The UK Business Unit is comprised of Market Units and Local Practices. Market Units comprise Consumer Products, Retail & Distribution, Energy, Utilities & Chemicals, Manufacturing, Aerospace & Defence, Life Sciences, Public Sector and Telco, Media, Technology & Services. Local Practices comprise Application Management Services, Business & Technology Solutions, Custom Software Development, Digital Customer Experience and Packaged Based Solutions.

Our UK business conduct policy incorporates the principles of our [Group Code of Business Ethics](#). This Code describes the importance of ethical behaviour which underpins Capgemini's business ethos. It reflects Capgemini's core values, which for more than fifty years have guided our principles, permeated our culture, and inspired the individual behaviour of each employee. The UK policy incorporates a requirement for employees to respect human rights and not to allow forced, bonded or child labour.

As a people company we embed our core Values in our way of working right from the start, making the respect and promotion of human rights fundamental to achieving our objective to act always in alignment with our Values. Our Group Human Rights Policy is an embodiment of our commitment to the absolute respect of human rights of all our team members across our organisation, and in our business practices toward our suppliers and clients.

Visit us at www.capgemini.co.uk.

We are part of a global network of Capgemini entities in the Capgemini Group. From time to time, we subcontract elements of our client engagements or operations to other Group companies, for example when providing services under our Rightshore™ model. Our Group companies are therefore part of our supply chain. However, in our risk assessment and due diligence activities we have distinguished between members of the Capgemini Group in our supply chain and third-party suppliers. This is because each Group company to whom we may sub- contract adheres to our Group policies and governance processes. They are founded on and practice the same values and ethics that Capgemini does, and we share a commitment that ethics and integrity are fundamental and uncompromising elements of the way we conduct our business.

In this Transparency Statement, therefore, when we refer to our suppliers, we mean third party suppliers.

Our ethical principles, and since 2016, specific obligations referring to modern slavery have been incorporated into all our contracts, purchase orders, supplier selection and performance procedures, and remain a prerequisite for doing business with Capgemini. This Transparency Statement demonstrates one of the tenets of our responsible approach to business and our longstanding commitment to the principles of the 1948 Universal Declaration of Human Rights, the International Labour Organisation, the Organisation for Economic Co-operation and Development guidelines for Multinational Enterprises and the UN Global Compact Programme.



The principles of the fundamental conventions on labour standards of the International Labour Organisation (ILO).



The Organisation for Economic Co-operation and Development (OECD) guidelines for Multinational Enterprises.



The principles of the UN Global Compact Programme and the “Caring for Climate” and “Women’s Empowerment Principles” initiatives.

“ For us, respect is at the heart of an inclusive workplace – it underpins our people’s experience at work, it’s integral to building relationships with our clients, and is key to getting the inclusive future we want ”

Carolyn Miller
Capgemini HR Director

HR processes and practices

At Capgemini UK, we pride ourselves on having an inclusive culture where everyone is treated with respect and dignity and this is promoted regularly throughout the Company. Our vision is to be recognised by our current and future workforce, our clients and in the market as a truly inclusive organisation, where everybody feels valued, included and empowered. Our employee survey tells us how important this is to our colleagues and that their experiences are very positive.

Building on our commitment to foster a positive and inclusive workplace, our [“Respectfully Us”](#) programme, launched in 2019, continues to drive a programme of activity that encourages all of us to stand up to inappropriate behaviour in all its guises by ‘breaking the silence’. We have also trained independent Inclusion & Respect Ambassadors across the company. Employees can approach the Ambassadors informally, as trusted advisers, with any concerns to look at ways to resolve inappropriate behaviour in a respectful and open way.

Our ethics helpline, [“SpeakUp”](#) is a natural extension of our values-based culture and high ethical standards. It is a web and phone-based ethics reporting, incident management and advisory tool, hosted by an independent service provider and managed by Group Ethics and supported by our global network of Ethics & Compliance Officers and HR investigators. SpeakUp is voluntary, confidential, and allows anonymity, unless stated differently by a country’s local law. It is made available by Capgemini to our team members, customers, suppliers, and business partners. SpeakUp is a commitment from Capgemini: to listen to voices when raised in good faith; to be fair when investigating an alert, to respect organizational justice and maintain confidentiality; and to protect the reporter from any form of retaliation. This commitment is endorsed by all members of the Board of Directors of Capgemini SE and members of the Group Executive Board as part of their individual and collective support of the provisions of the Code of Business Ethics. SpeakUp empowers reporters to report alerts and/or ask for advice and guidance about actions or behaviours that are: not aligned with our Values, our Code of Business Ethics and related ethics & compliance policies, not in compliance with applicable laws, or that may significantly affect vital interests of Capgemini and its affiliates.

Anyone who raises or helps to address an alert on SpeakUp in good faith is protected by our non-retaliation policy. Substantiated alerts

We believe our people are our greatest asset and as an employer of choice, we aim to attract and retain the best talent in the market. We recognise and value the importance of individual contribution to the overall success of our business and believe that everyone should be paid fairly - at a level where they can afford a minimum acceptable standard of living.

result in appropriate remediation actions including disciplinary action or process improvements.

We also have an established employee representation body: the Capgemini Works Council (CWC) who are directly elected by Capgemini UK employees. The CWC have been actively involved in and consulted about 'Respectfully Us' and support our approach to resolving conflict at work informally through mediation and dialogue.

Capgemini is acutely aware of the possible impacts of the coronavirus (COVID19) pandemic on modern slavery risk. In compliance with UK law, our recruitment teams conduct a Right to Work check on all new joiners. Under normal circumstances this check is completed face to face. However, from 30th March 2020 Right to Work checks were adjusted, on government advice, due to coronavirus and changes were introduced to conduct checks via video conferencing, which Capgemini continues to follow in line with the current UK Government guidelines.

Our HR practices also include the application of measures to our payrolls with regards to the detection and prevention of debt bondage amongst our employees. Debt bondage is work exchanged for a debt which, ultimately, can never be paid. This activity is now one of our Key Performance Indicators with no issues identified in our payroll run. Performance against our Key Performance Indicators is reported for the first time in this Transparency Statement.

Capgemini UK continues to be a Living Wage employer; an accreditation we have maintained since 2016. We believe our people are our greatest asset and as an employer of choice, we aim to attract and retain the best talent in the market. We recognise and value the importance of individual contribution to the overall success of our business and believe that everyone should be paid fairly - at a level where they can afford a minimum acceptable standard of living. We are pleased to report that this commitment is shared by our Workplace Services providers who have signed up to contractual obligations to pay the Living Wage to all employees engaged at Capgemini UK sites.



All Capgemini's purchases are governed by Our 12 Core Principles of Sustainable Procurement



**Respect for
Human rights**



**Refusal of forced or
compulsory labour**



**Promotion of Equality
and diversity**



**Fair disciplinary
practices**



**Health and
Safety**



**Refusal of bribery and
corruption**



**Compliance with
applicable laws**



**Refusal of
child labour**



**Employee wellbeing
and development**



**Freedom of
association**



**Confidentiality and
intellectual property**



**Reduction of
Environmental impacts**

2,227
suppliers
assessed since
2016 (100% of
live suppliers)

806
suppliers
assessed/re-
assessed in
2020

500
new suppliers
assessed in
2020

Procurement and supply chain

We aim to ensure that our external expenditure complies with all applicable legislation, the UN Global Compact and our own policies, and that it delivers cost-effective, high-quality service to our business and clients on a sustainable and ethical basis. For more than 16 years, we have had a Purchase Order Mandatory policy and a central purchasing system which gives us a very precise and clear view of our procurement activity. Over a financial year about 1,500 of those suppliers are active in our ecosystems. We ask our suppliers to accept and adhere to our [Supplier Standards of Conduct](#).

Procurement and the Sustainability Compliance Team

We have a dedicated sustainability compliance team within our procurement organisation who conduct risk assessments on all our UK suppliers. Our UK procurement team have all successfully passed the Chartered Institute of Procurement and Supply (CIPS) ethical training module for the second year running

Assessment of risk within our supply chain

Capgemini UK has assessed its entire supplier base against our [Core Principles of Sustainable Procurement](#). More than 95% of suppliers were found to meet our sustainability criteria; we no longer do business with the remaining 5%.

“ Capgemini remains committed to ensuring there is no room for modern slavery in our vendor ecosystems and supply chain. As well as compliance, it is one of our core ethical values and a genuine concern for our company given our utmost ethical standards. Our employees, partners, clients and shareholders are continually striving to eradicate modern slavery and make it every day's reality ”

Emmanuel Erba
Chief Procurement Officer

Capgemini's COVID19 position

Capgemini UK's response to, and compliance with, COVID19 challenges and restrictions has followed Government and Capgemini Group guidance. Our UK COVID19 planning activity continues to be co-ordinated by a team of business representative and subject matter experts. Capgemini acknowledges that during a pandemic, modern slavery and its elimination remains of paramount importance. Capgemini continues to strive for zero tolerance on many fronts to detect and eradicate modern slavery during these challenging times.

Capgemini's highest priority remains maintaining the health, safety and security of our employees, clients and stakeholders. Whilst we are seeing a significant reduction in positive COVID19 cases being reported internally we cannot afford to be complacent with respect to the potential risk of infection transmission. Resilience plans are in place for our delivery and we continue to work closely with our clients to ensure that risks are identified, and appropriate mitigation actions are implemented.

We recognise the challenges that our teams continue to face in dealing with the pandemic and associated restrictions. We continue to offer a vast range of support for our team members which includes a community of mental health champions trained to support colleagues; a virtual community where colleagues can stay socially connected; a Homeworking Charter recognising and respecting our people's different situations; and a broad range of mental, physical and financial wellbeing employee benefits.



“ The data gathered in our bespoke Supplier Profile Assessment tool is powerful. It has facilitated a greater intimacy with all our suppliers and enabled the identification of any risks of slavery associated with the commodity, geography, performance or lack of knowledge. We use this transparency to focus our efforts to resolve any issue ”

Melissa Thorpe
Senior Sustainability
Manager, Global
Procurement

Due diligence

We have committed to conducting annual due diligence on all procurement policies to identify any area where Capgemini could be unintentionally putting pressure on our suppliers in a way which may lead to modern slavery risks.

In addition to the annual review of procurement policies all procurement processes are also subjected to annual due diligence to ensure we do not put undue pressure on suppliers. This exercise provides our procurement professionals including buyers, commodity managers and category directors with the tools to deliver Capgemini's policies.

Annual due diligence is also undertaken on Capgemini UK's annual spend to determine how any change in our spend profile affects the risk of modern slavery within our supply chain.

Our supply chain

Since March 2010 all our active suppliers have been required to complete our on-line assessment, this is a contractual obligation. Since September 2016 our innovative bespoke tool assesses the Corporate Responsibility & Sustainability (CR&S) aspects as well as the corporate compliance of our suppliers. It includes questions, requiring evidence, about their modern slavery policies, actions and intended future activity. The risk assessment of the supplier base enables us to map the risk of modern slavery by commodity supplied and location of supply and is applied to all suppliers to Capgemini UK and therefore covers suppliers to all areas of our business and organisation. The system issues automatic alerts if a risk, by virtue of the country and / or the commodity, is identified. The supplier is also required to make an individual response to questions that enable the identification of risks within their business which need further investigation and evaluation by our supply chain experts.

Of all assessed suppliers, a significant number did not give answers that met our expectations. Their answers ranged from having no knowledge of the Modern Slavery Act 2015 to not intending to review their supply chain for risk of modern slavery.

To fulfil our commitment to manage our supply chain, all suppliers in this group were re-contacted and we stressed the importance to Capgemini, and our clients, of taking a vigilant stance against slavery and how we expect our suppliers, and their suppliers, to be aligned with our ethical standards. We provided resources for them to self-educate, to understand and consider their ethical and business obligations.

Capgemini's continued recognition



Llywodraeth Cymru
Welsh Government

As a supplier to the Welsh Government, we became the first signatory to their Code of Practice: Ethical Employment in Supply Chains.



Capgemini UK has retained its Platinum recognition status from the world-renowned sustainability ratings company EcoVadis. Platinum status is for the top 1% of suppliers.



CIPS PROFESSIONAL
ETHICS

0737 / VALID TO 31.03.2022

Capgemini UK was again awarded the CIPS Corporate Ethical Procurement and Supply Kite Mark

Key Performance Indicators (KPIs)

The KPI targets developed below were intended to give transparency to our aspirations, actions and performance. This is the first Transparency Statement in which we have monitored, tracked and reported against them.

KPI: 100% compliance with Capgemini's standards in relation to modern slavery for all active suppliers

- Our compliance rate is 95.5% and we continue to work with those suppliers who we believe have the potential to comply

KPI: 100% of suppliers assessed via Capgemini's Supplier Profile Risk Assessment tool

- All suppliers are now assessed as part of standard on-boarding and annual review supply chain processes

KPI: Transparency Statement published on Capgemini's external website within six months of the company's financial year end

- The 2019 Transparency Statement was published on 4th June 2020 prior to the 30th June 2020 deadline

KPI: Annual mapping of supply chain spend and risk modern slavery

- An annual due diligence exercise has been conducted on the 2020 spend of Capgemini UK plc. It confirmed that, whilst there is an ever-present risk of slavery, ours is a relatively low risk. Despite the pandemic the spend profile has not significantly changed in either sources, value

or constituents and there is no apparent increased risk of slavery. We have mapped the areas of risk and implemented policies, processes, contractual clauses, and assessments to detect and prevent incidents of modern slavery and uphold our zero tolerance approach

KPI: Conduct annual due diligence on procurement policies, processes and practices

- Annual due diligence is now conducted on all policies, processes and practices

KPI: All available Capgemini UK employees are required to undertake the bespoke modern slavery mandatory training

- A training module has been developed and approved internally and so this is now ready to be launched in 2021

KPI: Debt Bondage detection measures conducted on each payroll run

- We can confirm that the appropriate detection measures are being conducted on each payroll run



Creating awareness

As noted above we have created a bespoke mandatory training module for all Capgemini UK employees which may also be used for other groups such as contractors.

All UK procurement professionals undertook and passed the CIPS Ethics Training for the second year running. This training ensures that all staff who select and manage suppliers are trained in ethical sourcing and supplier management. Additionally, Capgemini UK have signed the 'Statement of Commitment to Ethical Procurement and Supply'.

The CIPS Corporate Code of Ethics is a voluntary code, and organisations are encouraged to adopt it to demonstrate their corporate commitment to the principles of ethical procurement. The Code describes several principles which set out the values, business culture and practices to which organisations should be held accountable.

On annual Anti-Slavery Days Capgemini has published articles and educational links on our intranet site, visible to all UK colleagues. Capgemini is committed to a similar awareness campaign to mark Anti-Slavery Day on 18th October 2021.

Since 2017 we have maintained a dedicated email address that employees can use to email questions or concerns around modern slavery. They can also share their ideas and experiences of modern slavery issues. The email address is modernslavery.enquiries.uk@capgemini.com.

Supplier awareness and education

127 of Capgemini UK suppliers who failed to meet our strict modern slavery standards improved their knowledge and/or committed to reviewing their supply chain to take steps to detect and prevent modern slavery within their supply chain. Our current compliance rate is 95.5% and we continue to work with those suppliers who have the potential but do not yet meet our standards. We recognise that it is not always possible to resolve issues, and in those circumstances, we may choose to end our business relationship.

Debt bondage

Debt bondage, also known as debt slavery, bonded labour or peonage, is the most common form of slavery, and yet is the least known. Debt bondage is the pledge of a person's services as security for the repayment for a debt or other obligation, where the terms of the repayment are not clearly or reasonably stated and the person who is holding the debt has some control over the labourer. These debts are often paid via recruitment fees and Capgemini Group has introduced a prohibition of the practice of all forms of worker- paid recruitment fees. All suppliers are obligated in their own organisation and their supply chain, to implement appropriate measures to ensure prevention and detection of these types of exploitation.

Accordingly, Capgemini UK have applied measures to our payrolls with regards to the detection and prevention of debt bondage amongst our employees. As noted above, this activity is now a KPI and is reported in this Transparency Statement.



Get the Future You Want

Capgemini Group acquired Altran in 2020 and has created a new business unit - Capgemini Engineering - with cutting edge technologies which now support the convergence of the physical and digital worlds. In light of this acquisition and integration, Capgemini's 2021 Transparency Statement now extends to Altran UK's operations and ethos.

As a leader in digital transformation, we are also a responsible company working to ensure that technology and innovation drive sustainable and social development. We have strengthened this commitment to our employees, clients, and partners by leveraging three fundamental pillars: Active Inclusion, Digital Inclusion, and Environmental Sustainability. In this way, we serve as [Architects of Positive Futures](#).

To assist in our ambition to prepare people for work and to support people who may be unemployed or displaced and looking for work, we continue our relationship with The Prince's Trust and Schools Outreach programme where we are key partners for the digital literacy programme 'Level Up'. Our relationship continues with Code Your Future in the UK aiming to transform the lives of refugees and people from disadvantaged backgrounds, by offering end-to-end support through a series of eight-month training programmes, providing Capgemini mentors and, crucially, offering employment opportunities at the end.

Our people continue to support Naandi's Nanhi Kali initiative to fund girls' education in India, to help lift families out of poverty and avoid the sort of employment which is more at risk of modern slavery.

From the environmental perspective, we have launched our new program to achieve "net zero emissions" by 2030. To meet this challenge, Capgemini has set several targets, which were approved by the Science Based Targets initiative (SBTi) as being consistent with the level of carbon footprint reduction needed to limit global warming to 1.5°C above post Industrial Revolution levels. Additionally, we are committed to working with our clients to support their sustainability journeys.

Organisational culture and values are the most important factors for employee satisfaction in the UK. To create a truly inclusive culture takes action – which is why we inspire our people to think, engage and act in an intentionally inclusive way through our [Active Inclusion](#) programme

You can find out more about the extensive work we do to ensure our business has a positive impact on our people, our communities and the environment, in our UK Corporate Responsibility and Sustainability report: [Architects of Positive Futures](#) and our [Group Integrated Report](#).

We have strengthened this commitment to our employees, clients, and partners by leveraging three fundamental pillars: Active Inclusion, Digital Inclusion, and Environmental Sustainability.

Our commitments

Last year as part of Capgemini's commitment to be a responsible business and take a zero-tolerance approach regarding modern slavery, we focussed on several key activities and have reported progress against each below:

Inform Capgemini's Country Board about how the KPI's have been met

- We have undertaken and continue to undertake formal continuous reporting directly to the UK Country Board on how we met all our KPI's

Provide outcomes and action plans from annual due diligence

- Due diligence exercises have been undertaken and there are no outstanding action plans. Planned implementation of mandatory training and compliance monitoring is in place. Resources review is underway and the status of modern slavery in the organisation continues

Develop specialised and focussed training for specific groups

- Capgemini has created a mandatory training course for all its UK employees which has been approved internally. It will be implemented in 2021 and repeated by employees every 2 years. The Procurement team have received specialist training in 2020 & 2021

Develop a procedure for managing reported concerns

- Discussions are underway to create a process to integrate modern slavery issues into existing company concerns processes

To identify opportunities and develop action plans for continuous improvement

- This activity has commenced for compliance, training progress and HR debt bondage assessment

Introduce modern slavery awareness to all new employees as part of Capgemini UK's 'BeInspired' induction programme.

- Modern Slavery is now an agenda item on the new joiner's induction program as part of the Ethics principles presentation

Future commitments

Capgemini continues to commit to improving its processes, procedures and policies year on year ensuring we continue to be a responsible business.

- Capgemini plans to launch a new edition of the 'Ethics@Capgemini' mandatory training. This provides comprehensive guidance on all aspects of Values and Ethics
- We shall develop and deliver training modules for other specialist groups such as suppliers and contractors
- Our UK procurement professionals shall ensure Capgemini maintains the CIPS 'Ethical Mark' accreditation
- We shall continue to identify new opportunities and create action plans for continuous improvement





This Transparency Statement was approved by the Board of Directors for Capgemini UK plc on 1st June 2021



Julie Mangan
Company Secretary

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 every-day by its purpose of unleashing human energy through technology for an inclusive and sustainable future. It is a responsible and diverse organisation of 270,000 team members in nearly 50 countries. With its strong 50 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 2020 global revenues of €16 billion.

Get the Future You Want | www.capgemini.com