

SpeakUp Policy for Hungary

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1. About SpeakUp

1.1 Introduction

Purpose

Capgemini, right from its inception, has always strived to be an ethical and human 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.

In Hungary, SpeakUp is a voluntary, confidential web and phone-based intake system of

Capgemini Magyarország Kft. (1118 Budapest, Rétköz utca 5, Cg. 01-09-989715, contact details on <https://www.capgemini.com/hu-en/>, hereinafter referred to as: **Capgemini**), respectively of Restaurant Development International Hungary Ltd. (1117 Budapest, Infopark D épület, Gábor Dénes u. 2., Cg. 01-09-969838, contact details on <https://www.rdisoftware.com/>, hereinafter also referred to as: **Capgemini**). Convercent, Inc. at 3858 Walnut Street, Suite 255, Denver, CO 80205, USA. (referred to as: Covercent) is an independent service provider acting as a data processor for Capgemini based on data processing agreement, and provided by Capgemini to its employees, customers, suppliers and business partners and those of its affiliates ("**reporter**").

To ensure an efficient and effective management of ethics concerns and in response to specific requirements of Hungarian laws, each Capgemini company also engages an independent attorney for handling reported concerns.

For **Capgemini Magyarország Kft.** this independent attorney is dr. Balázs LOHN (Attorney-at-law) c/o LOHN ÜGYVÉDI IRODA / LOHN LAW FIRM, H-1053 Budapest, Károlyi utca 12., Ybl-palota II. Emelet, H-1112 Budapest, Háromszék utca 37., Hungary, Tel.: +36 1 769 16 30, balazs.lohn@lohn.hu.

For **Restaurant Development International Hungary Kft.** this independent attorney is dr. jur. András CSEHÓ (Attorney-at-law), PETERKA & PARTNERS Iroda Law Offices Vörösmarty tér 4, 1051 Budapest, Hungary, Tel.: +36 1 235 1092, cseho@peterkapartners.hu.

For this purpose all communication with the reporter shall be regarded as reports under the applicable law Act CLXV of 2013 on Complaints and Whistleblowing, that bring the stakeholders' attention to such circumstances the remedy or termination of which serves the legal or business interest of Capgemini or the reparation of any risk to infringement of laws, public safety, public health or the environment.



The independent attorney:

- provides legal consultation to you concerning the reporting;
- keeps contact with you and may request further information for the investigation of the report;
- may participate in the investigation conducted by Capgemini;
- if requested, keeps you informed in writing concerning the actions taken place as a result of the report, especially including the result of the proceeding, the actions taken or the rejection of the further investigation.

The independent attorney forwards the report to Capgemini, however, the independent attorney is bound by professional secrecy rules regarding your identity, therefore only an extract of the report without your personal data is shared with Capgemini, except for the case when you agree to waive your entitlement to secrecy in advance in writing.

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, members of the Group Executive Board (GEB) and by the management of Capgemini Hungary as part of their individual and collective support to the provisions of the Code of Business Ethics.

Scope

SpeakUp empowers reporters to report concerns and/or ask for advice and guidance about actions or behaviors that are:

1. not aligned with our Values, our Code of Business Ethics and related ethics & compliance policies,
2. not in compliance with applicable laws, or
3. that may significantly affect vital interests of Capgemini and its affiliates.

Potential reporters may be Capgemini employees, Capgemini contracted partners and such persons who have a legitimate interest in the remedying or termination of the conduct being subject to the report.

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.

Benefits

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



- makes reporting concerns easy: anytime, anywhere, and in any language;
- ensures confidentiality and allows anonymity, if preferred;
- 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.

1.2 Use of the SpeakUp helpline

Use of the SpeakUp helpline is entirely voluntary. As a reminder, the normal route for reporting a possible violation is to raise it directly to your team leader or to your Ethics & Compliance Officer or a representative of the Human Resources department. There may also be additional resources available in certain countries, such as staff representatives, grievance procedures or specific helplines.

If you do not feel comfortable raising a concern through the above-mentioned mechanisms, or if you raised a concern locally but think that it has not been handled properly, you can use SpeakUp.

Upon reporting you are expected to declare that the report is made in good faith about circumstances that you are aware of, or if you can presume on a reasonable basis that the facts are valid. A legal person reporter shall provide their seat and the name of their legal representative making the report.

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 and might also qualify as a crime. Further, if it is determined that the reporter has not acted in good faith (i.e. the concern 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.

Capgemini processes within SpeakUp your personal data and the personal data of the person whose conduct was reported on or of the person who may have substantial information for the purposes of the investigation, if the above personal data are crucial for the investigation, including special categories of personal data and criminal data, for the purposes of the investigation and for the remedying or terminating the reported conduct and Capgemini is



entitled to share the above data with the independent attorney or any other external body participating in the investigation.

Personal data beyond the scope of the data detailed in the previous section will be deleted from the system.

You may remain anonymous, however, please note that the investigation of anonymous reports or repeatedly submitted reports may be ignored by Capgemini. Please also note that if more than 6 months passed since you obtained information concerning the reported conduct, then Capgemini may also ignore your report. Even if you choose anonymity (partial or full), you can still opt to receive notifications about the concern 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 concern:

- to track the progress of the concern
- 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 concern, 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 concern and your willingness to provide responses to any additional information requested by them; you are therefore requested to regularly login to the SpeakUp helpline to follow the status of your concern.

Your identity, if you do not choose anonymity, will not be known to anyone else but the people participating in the investigation (examiners). The examiners are subject to confidentiality rules concerning your identity and concerning the details of the investigation as long as the investigation is pending or reported to the competent authorities.

While the SpeakUp helpline allows anonymity, Capgemini strongly encourages reporters to disclose their identity when they report concerns as it would help address the concerns more efficiently. Additionally, it would help:

- expedite the investigation process since the investigation team has easy access to the reporter;
- protect the reporter, in case of any retaliation;
- avoid/reduce reporting of concerns done maliciously or in 'bad' faith; and
- reinforce the trust in the ethical culture of the organization.

Your personal data may be transmitted only to the authority competent for the investigation if the authority is entitled to process such personal data in line with the applicable laws or if the reporter clearly consented to the transmission. Without your clear consent your personal data will not be disclosed publicly.

If it becomes clear that you acted in bad faith and provided substantial false information and there is a suspicion for the perpetration of a crime, then your personal data will be forwarded to the competent authority or if it is likely that this conduct caused damages or any other harm to a third person, then, at request, personal data shall be provided to the competent authority.



If the investigation reveals that the report was unfounded or it is not necessary to take further actions, then the personal data in the report shall be erased within 60 days from the completion of the investigation.

Know more about SpeakUp by watching the videos available on [Talent](#) and on the SpeakUp portal at www.capgemini.com/speakup.

You can report a concern or submit a question using the SpeakUp helpline by either visiting SpeakUp portal or by using the local SpeakUp phone number available on the SpeakUp portal.

1.3 Management of concerns

Once a concern is raised in the SpeakUp helpline, auto generated messages would be sent to (i) you, acknowledging receipt of the concern and (ii) Capgemini's Group Ethics Office notifying receipt of the concern. Group Ethics Office shall perform preliminary assessment of the concern to determine the appropriate course of action and your concern will accordingly be assigned to the independent attorney for appropriate action.

All concerns reported in SpeakUp will be dealt with thoroughly within a 30-day period from the receipt of the report. This 30-day period can be extended up to 3 months if this is necessary due to the circumstances of the reported conducts. The independent attorney investigating the concern 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 the SpeakUp helpline. 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 concern 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 concern 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 concern or seek advice and guidance on an ethics or compliance concern, 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 concern. 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 under the SpeakUp helpline or by writing to us at ethics@capgemini.com.

2. Privacy Notice

2.1 Definitions

"Personal Data" means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

"Data Subjects" means the natural person whose Personal Data are processed.

"Binding Corporate Rules" or **"BCR"** means Personal Data protection policies which are adhered to by a controller or a processor established on the territory of a Member State for transfers of Personal Data to a controller or a processor in one or more third countries within a group of undertakings, or group of enterprises engaged in a joint economic activity.

"EU Model Clauses" means the standard contractual clauses adopted by the European Commission for the transfer of Personal Data from data controllers located in the European Union to data controllers or data processors established outside the European Union or European Economic Area.

"Supervisory Authority" means the public authority responsible for monitoring the application of the applicable data protection laws and regulations.

2.2 Who is processing your Personal Data and why?

Capgemini Magyarország Kft. (1118 Budapest, Rétköz utca 5, Cg. 01-09-989715, contact details on <https://www.capgemini.com/hu-en/>, respectively of Restaurant Development International Hungary Ltd. (1117 Budapest, Infopark D épület, Gábor Dénes u. 2., Hungary, Cg. 01-09-969838, contact details on <https://www.rdisoftware.com/> as

affiliates of Capgemini SE (together referred to as "Capgemini"), through the SpeakUp helpline capture and further process Personal Data to investigate a concern submitted by the reporter. The processing of Personal Data is carried out by Capgemini in its legitimate interest to uphold its Values and protect its ethical culture by fostering an open, transparent and safe working environment and to comply with legal obligations in certain countries which have whistleblowing regulations.



The Personal Data and information you share and which may be processed by Capgemini include: (i) your name, your contact details and whether you are employed by Capgemini; (ii) the name and other personal data of the persons you name in your report if you provide such information (e.g., description of functions and contact details); and (iii) a description of the alleged misconduct as well as a description of the circumstances of the incident, which may contain Personal Data.

2.3 Who can access your Personal Data?

The Personal Data and information you provide will be stored in a secure database which is located on servers hosted and operated by a third-party service provider, Convercent, Inc. at 3858 Walnut Street, Suite 255, Denver, CO 80205, USA, in Ireland. Convercent has entered into contractual commitments with Capgemini to secure the information you provide in accordance with applicable law.

For the purpose of processing and investigating your concern and subject to the provisions of applicable local laws, the Personal Data and information you provide shall be communicated to Capgemini's Group Ethics Office, which shall perform a first review of your concern. Depending on the Group Ethics Office's assessment, your concern will be assigned to the independent attorney for appropriate action whereby the Personal Data and information you provided may be accessed and, further processed by the relevant independent attorney, for Capgemini Magyarország Kft. this is dr. Balázs LOHN (Attorney-at-law) c/o LOHN ÜGYVÉDI IRODA / LOHN LAW FIRM, H-1053 Budapest, Károlyi utca 12., Ybl-palota II. Emelet, H-1112 Budapest, Háromszék utca 37., Hungary, Tel.: +36 1 769 16 30 , balazs.lohn@lohn.hu, and for Restaurant Development International Hungary Kft. this is dr. jur. András CSEHÓ (Attorney-at-law), PETERKA & PARTNERS Iroda Law Offices Vörösmarty tér 4, 1051 Budapest, Hungary, Tel.: +36 1 235 1092, cseho@peterkapartners.hu, who may involve personnel of Capgemini, including Ethics, Human Resources, Finance, Internal Audit, Legal, management, external advisors (e.g., legal advisors), and, in limited circumstances, by technical staff at Convercent.

As a result, the Personal Data and information you provided in your concern may be transferred to Capgemini's affiliates and/or third parties located outside of the European Union ("**EU**").

Where the Personal Data and information are transferred to Capgemini affiliates, such transfer shall be covered by Capgemini's Binding Corporate Rules ("**BCR**"), ensuring an appropriate level of protection to the Personal Data. For more information on the BCR please visit <https://www.capgemini.com/resources/capgemini-binding-corporate-rules/>.

In addition, your Personal Data may be accessed by Convercent from the United States of America for maintenance purposes, in which case such transfer shall be framed by the EU Model Clauses, ensuring an adequate level of protection to the Personal Data. In order to protect Personal Data from unauthorized use, access, disclosure, theft, manipulation, or reproduction, a comprehensive set of data protection and information security standards have been adopted and are maintained by Convercent, as further described in the Convercent Master Services Agreement, Exhibit A (Data Security), which is available on <https://www.convercent.com/resource/legal/>.



Personal Data and information you provide may also be disclosed to the police and/or other enforcement or regulatory authorities for investigation purposes.

2.4 How long will Capgemini keep your Personal Data?

Where your concern falls outside the scope of the SpeakUp helpline, Personal Data contained in the concern will be redacted immediately upon such assessment.

Where your concern falls into the scope of the SpeakUp helpline, Personal Data you provided will be kept for:

- Two (2) months maximum after closing the concern in SpeakUp tool, or
- The duration of the disciplinary or judicial procedure where applicable,
- Except that if the data is required in the event of a potential lawsuit against the Company, it will be kept for the duration of the statute of limitations regarding the potential lawsuit.

2.5 What are your rights and how to exercise them?

As a Data Subject you can request to access, rectify or erase your Personal Data. You may also object to the processing of your Personal Data, or request that it be restricted. In addition, you can ask for the communication of your Personal Data in a structured, commonly used and machine-readable format. Those rights are further explained in the Data Subjects Requests Handling Procedure, see Appendix 3 of the Capgemini Binding Corporate Rules, which is available at <https://www.capgemini.com/resources/capgemini-binding-corporate-rules/>.

If you wish to exercise those rights, please contact Capgemini's Global Data Protection Officer by sending an email to the following address: dporequest.hu@capgemini.com

You also have the right to lodge a complaint before the Supervisory Authority Nemzeti Adatvédelmi és Információszabadság Hatóság, 1125 Budapest, Falk Miksa utca 9-1122/c, +36 (1) 391-1400, ugyfelszolgalat@naih.hu and/or before the competent court of law.

Capgemini will promptly notify any person who is the subject of a concern as to the status of their concern, except where such notification must be delayed to preserve evidence. The subject of the concern has the right to access information relating to the concern (with the exception of data that may allow to identify the reporter) and to request correction of his/her Personal Data that may be inaccurate or incomplete in accordance with applicable law.

About Capgemini

Capgemini is a global leader in consulting, digital transformation, technology and engineering services. The Group is at the forefront of innovation to address the entire breadth of clients' opportunities in the evolving world of cloud, digital and platforms. Building on its strong 50-year+ heritage and deep industry-specific expertise, Capgemini enables organizations to realize their business ambitions through an array of services from strategy to operations. Capgemini is driven by the conviction that the business value of technology comes from and through people. Today, it is a multicultural company of 270,000 team members in almost 50 countries. With Altran, the Group reported 2019 combined revenues of €17billion.

Learn more about us at www.capgemini.com



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