



Transparency Statement

Made under s54 Modern Slavery Act 2015
Capgemini UK plc

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 ensure that slavery and human trafficking is not taking place in its organisation and supply chain. It constitutes Capgemini UK plc's Transparency Statement for the financial year 2018-2019.



We must strive to ensure there is no modern slavery in our business and supply chain. Our team members, clients and stakeholders demand it and I am determined to deliver on this promise. As one of the world's most ethical companies this is not merely an aspiration, it is our commitment."

Christine Hodgson

*Member of the Group Executive Committee
Chairman, Capgemini UK
Chief CSR Officer*

Introduction

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 2019, the Capgemini Group was named as a 2018 World's Most Ethical Company @ by the Ethisphere Institute for the seventh consecutive year. This global recognition for our long-standing commitment to company-wide ethical leadership, compliance practices and environmental and social responsibility makes us one of only three companies in the Consulting Services sector to have received this prestigious accolade.

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 ways we look after and encourage our employees, to our sustainable procurement practices and minimising the environmental impact of our business and our clients' businesses. In 2018, Capgemini UK achieved recognition from several client and investor disclosure schemes including

- Top 50 -Best places to work (Glassdoor)
- Development Awards winner (ise.)
- Achieving Impact, Silver (Mind)
- Top 100 employer (Stonewall)
- Top 50 employer for women (The Times), and Top 50 Social mobility employer index (Social Mobility Foundation)

In 2017, as a supplier to the Welsh Government, we became the first signatory to their Code of Practice: Ethical Employment in Supply Chains.

Whilst we cannot absolutely guarantee there is none, we are committed to our employees, clients, suppliers and stakeholders to taking appropriate steps to do what we can to eradicate modern slavery in our business and our supply chain. This document describes our business and supply chain, our policies covering ethical behaviours, and standards and sets out the steps we are planning to ensure continuous improvement.

Our Corporate Responsibility and Sustainability Board supports this Transparency Statement.

About Capgemini's business and supply chains

A global leader in consulting, technology services and digital transformation, Capgemini is at the forefront of innovation to address the entire breadth of clients' opportunities in the evolving world of cloud, digital and platforms.

For over 50 years we have been 'living the future', delivering ground-breaking innovation and technology solutions to our clients. Building on this strong 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. It is a multicultural company of 200,000 team members in over 40 countries. The Group reported 2018 global revenues of EUR 13.2 billion.

Core to our business approach is our commitment to being a leading responsible and sustainable business.

Visit us at www.capgemini.co.uk. People matter, results count





Our Supply Chain

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 we do 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 are talking about our suppliers, we mean third party suppliers.

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 clients on a sustainable and ethical basis. For more than 15 years, we have had a purchase order mandatory policy and a central purchasing system (Global Purchasing System – GPS), which gives us a very precise and clear view of our procurement activity. At any one time there are approximately 4,500 live suppliers in the UK and over a financial year about 1,500 of those suppliers are active in our ecosystems. We ask all our suppliers, before they are accepted into GPS, to acknowledge and accept our **Supplier Standards of Conduct**. This document 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 Organization and the OECD guidelines for Multinational Enterprises.

Our ethical principles, and since 2017, specific obligations referring to modern slavery, have been incorporated in all of our contracts, purchase orders, supplier selection and performance procedures and remain a prerequisite for doing business with Capgemini.



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.

“ Today, employees, investors and stakeholders are putting their greatest trust in companies to take leadership on societal issues. The World’s Most Ethical Companies set the pace that others follow, taking the long view with a purpose-based strategy that fuels their culture and business success. Each year we evolve our recognition methodology to ensure we are acknowledging the real leaders in ethical corporate governance and best practice. I congratulate everyone at Capgemini for earning this accolade for a seventh year in a row.”

Timothy Erblich
CEO, Ethisphere Institute

Risk assessment

Assessment of risk of modern slavery within our organisation

In 2018, we further increased the detail of our risk assessment of our business by continuing to map the assessment of our employment practices in line with internationally recognised standards. Once again, our risk assessment revealed the risk of modern slavery in our UK business to be low. Our skilled and agile employees have greater control over their careers, and this significantly reduces the risk of modern slavery. We have a range of employment policies that protect and enhance our employee’s experience at work.

In compliance with English law, our recruitment teams conduct a right to work check on all new joiners. This check is completed face to face so there is no need for the new employee to send off a passport or other identity documentation.

External resourcing is a potential risk area for Capgemini UK plc, although the highly skilled, specialist contractors we engage from time to time are at low risk of modern slavery offences.

We are committed to the ILO Fundamental Principles of eliminating discrimination in respect of employment and occupation. We have trained our executives and senior employees on how to tackle any unacceptable behaviour; not to be a bystander or enabler of discrimination or harassment but to lead by example.

Assessment of risk of modern slavery within our supply chain

The risk assessment of the supply chain maps the risk of modern slavery by commodity supplied and location of supply. The risk assessment is applied to all suppliers to Capgemini UK plc registered on the Global Procurement System (GPS) and therefore covers suppliers to all aspects of our business and organisation.

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%. Every new supplier is assessed for sustainability via an online survey and all current suppliers are expected to complete an assessment annually.

Due diligence

Our organisation

One of the biggest areas of spend in the UK is on contractors. These people are invariably highly skilled IT consultants who complement our own agile and collaborative employees to deliver our technology and business solutions. We continue to ensure the standard terms and conditions on which we engage recruitment services make explicit reference to compliance with modern slavery legislation as well as English law in terms of right to work checks.

Our 12 Core Principles of Sustainable Procurement



Respect for
Human rights



Compliance with
applicable laws



Refusal of forced or
compulsory labour



Refusal of
child labour



Promotion of
Equality and diversity



Employee wellbeing
and development



Fair disciplinary
practices



Freedom of
association



Health
and Safety



Confidentiality and
intellectual property



Refusal of bribery
and corruption



Reduction of
Environmental impacts



Everyone has the right to work in a respectful and positive environment, free from the fear of harassment – and free from the fear of repercussions when speaking out”.

Frances Duffy
UK HR Director

Capgemini UK plc, 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 Facilities Management Services providers who have signed up to contractual obligations to pay all employees engaged at Capgemini UK sites, the Living Wage.

In 2017 we successfully trialled an enhanced process to replace our “Raising Concerns Procedure”. In 2018 we rolled out “SpeakUp” a 24x7 phone-based and web-based helpline. “SpeakUp” allows employees, managers, suppliers and partners to report concerns about accounting, auditing, corrupt practises, unfair competition and other misconduct not in compliance with our 7 Values or our Code of Business Ethics.

At Capgemini we have long established employee representation bodies which represent every UK employee and reflect the ILO Fundamental Principle of Freedom of Association and the right of Collective Bargaining. We have consulted with our Capgemini Works Council (UK) throughout the past year and they have been active in supporting our “Resolution Agenda” whereby we seek to resolve conflict at work through mediation and dialogue facilitation. Furthermore, we consulted with the Capgemini Works Council (UK) regarding GDPR - protecting individual privacy is of huge importance to Capgemini.

Our supply chain

From September 2016 all our active suppliers have been required to complete our on-line assessment, this is a contractual obligation. Our innovative bespoke tool assesses the CR&S aspects as well as the corporate compliance of our supply chain. It includes questions, requiring evidence, about their Modern Slavery policies, actions and intended future activity. 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 the 1750 suppliers we have assessed, 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.

Our bespoke Supplier Profile Assessment is an invaluable tool that not only helps protect Capgemini against potential slavery in our supply chain, but also identifies those suppliers that may benefit from the guidance and self-educate resources that we are able to provide to help them understand and consider their ethical and business considerations.

1,750

suppliers assessed since 2016 (100% of live suppliers)

372

new suppliers assessed in 2018

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.

Consequently, 78% of those suppliers improved their knowledge and or committed to reviewing their supply chain in order to take steps to detect and prevent Modern Slavery within their supply chain. 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.

In 2019/2020 we will continue to:

- Risk assess all new suppliers
- Review all active suppliers whose assessment has reached or passed its' anniversary
- Reconduct the due diligence/risk assessment of our total spend in the context of location of supply and commodity supplied to identify any reduction or emerging risks
- Identify any opportunities where we can extend or increase our impact and influence

In 2018, we re-examined the KPIs and targets we set for our suppliers and we are satisfied they do not create undue influence which could lead a supplier to take a modern slavery risk in its production methods or its own supply chain in order to meet the service levels, targets or deliverables we have requested. We continue to look at increasing the education and support we provide to those suppliers in our supply chain most at risk of modern slavery.

Policies - people matter, results count

Our business conduct policy is contractual and describes the importance of ethical behaviour which underpins the Capgemini Group's business ethos. The policy reflects Capgemini's **core values** which for more than fifty years have guided the Group's principles of action, permeated our culture and inspired the individual behaviour of each employee. An invaluable ethical asset, these rules have always been defended with the utmost energy. The policy incorporates a requirement from employees to respect human rights, not to allow the use of forced or bonded labour and not allow the use of child labour. Policies governing our approach to responsible and sustainable business practice can be found [here](#).

Since the launch of our Active Inclusion programme in 2017, we remain committed to enabling our people to feel valued, included and empowered. Recognised externally in the Stonewall Top 100 Employers 2019, the Times Top 50 Employers for Women 2019 and the Social Mobility Index 2018 (amongst others), alongside internal feedback, our programme continues, allowing us to nurture highly functioning teams which foster innovation.

Our commitment to people extends to our social value programme at both Group and UK level where we recognise our responsibility to make sure that everyone has an opportunity to benefit from the digital revolution. We work with delivery partners within the community and schools to help young people from diverse backgrounds develop the skills, particularly digital skills, needed to gain work.

We have worked with The Prince's Trust for more than a decade supporting young people from disadvantaged backgrounds who are not in school, education or employment. Over this period, we have funded programmes such as a 'Get Started with Apps' where for one week, participants are given a grounding in the development lifecycle within an experiential setting to create prototype apps. 80% of our participants through this programme achieved positive outcomes (employment, education or further training).

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 entered into a partnership with Code Your Future. This not-for-profit organisation supports refugees and groups from disadvantaged backgrounds 'with a dream of becoming developers' and in 2018 we offered our first part-time six month training course in JavaScript programming. Twenty-five students, from backgrounds under represented within the Tech Sector were selected through various sources, (including four from The Prince's Trust) where we expect 70% to find employment within six months of completion (at least 5 with Capgemini).

In addition to our digital inclusion focus we continue to provide payroll giving as an option to all our employees who give to various causes close to their hearts. In 2018, nearly £77,000 was donated in this way. Our people continue to support Naandi's Nanhi Kali initiative to fund girls' education in India with around £13,000 per year donated to help lift families out of poverty and avoid the sort of employment which is more at risk of modern slavery.

Every year, we support our own people with their own community endeavours through our Community Spirit Awards. These recognise the efforts of our people with a small donation to their chosen charity. Annually, we support around 40-50 national and local charities and community groups in this way.

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

Our Values & Ethics programme is about who we are and the way we do business.

Our seven core values and code of ethics underpin our corporate culture and permeates through our business practices, procurement behaviours and welfare policies.



Honesty



Boldness



Trust



Freedom



Fun



Modesty



Team spirit



at the **heart of everything** we do



Training and awareness

Building on the training from last year, we are now considering rolling out a more focussed programme to raise awareness of modern slavery across our entire employee population.

Since 2017 we have maintained a dedicated email address that employees can use to email questions or concerns around modern slavery and our response to it. They can also share their ideas and experiences of modern slavery issues.

Continued commitment

In 2018 we continued to focus on our 5 priorities:

- 1** Continue to ensure that our values and ethics are embedded across our business, in the way we interact with our clients, our employees and our suppliers.
- 2** Develop and support supplier understanding of the importance to Capgemini of combatting modern slavery.
- 3** Review active suppliers whose initial risk assessment has reached or passed their anniversary.
- 4** Investigate ways to broaden the modern slavery training we give to our wider employee population.
- 5** Continue to seek ways to be a responsible corporate entity.

In 2018 our “UK Future Leaders” programme, co-sponsored by Capgemini’s Company Secretary, set the participants a challenge. “Future Leaders” provides high performing, high potential employees from all areas of the business with an opportunity to fast track their leadership development. The Challenge involved delivering a solution to a real business requirement. A team of “Future Leaders”, supported by both the UK Country Lead and Chair, undertook a comprehensive review of our adherence to modern slavery legislation. Their purpose was to enhance our reputation in this area and ensure we continue to maintain a zero tolerance stance on modern slavery within Capgemini. Whilst endorsing our current approach, a number of recommendations have been implemented to ensure continual improvement.

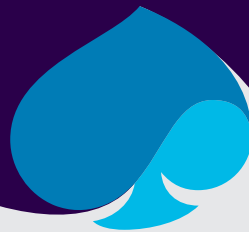
*This Transparency Statement was approved by the board of directors
for Capgemini UK plc on July 1, 2019*



A handwritten signature in blue ink that reads "Hodgson".

Christine Hodgson

Member of the Group Executive Committee
Chairman, Capgemini UK
Chief CSR Officer



About Capgemini

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Learn more about us at

www.capgemini.com

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