



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 2017-2018.



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

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 2018, the Capgemini Group was named as a 2018 World's Most Ethical Company @ by the Ethisphere Institute for the sixth 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 two 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 2017, the Capgemini Group achieved recognition from several client and investor driven disclosure schemes including the Standard Ethics Index, the FTSE4Good Index and on the Dow Jones Sustainability Index Europe for the first time. In 2017, as a supplier to the Welsh Government, we became the first signatory to their Code of Practice: Ethical Employment in Supply Chains.

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.

Last year, Capgemini Group celebrated its 50th birthday. For 50 years we have been 'living the future', delivering ground-breaking innovation and technology solutions to our clients. Building on this 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. It is a multicultural company of 200,000 team members in over 40 countries. The Group reported 2017 global revenues of EUR 12.8 billion.

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

Visit us at www.capgemini.com. 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 10 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 principles of the UN Global Compact Programme and the “Caring for Climate” and “Women’s Empowerment Principles” initiatives.



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

“It is our mission to define and advance the standards of ethical business practices that fuel corporate character, marketplace trust and business success. The World’s Most Ethical Companies recognition is first and foremost a measurement exercise with the honor being reserved for those who excel. We would like to congratulate Capgemini for consecutively maintaining its position as a World’s Most Ethical Company for the last five years. It has set a high benchmark for the industry, by evolving with the changing business environment while remaining steadfast in its commitment to corporate ethics and compliance.”

Timothy Erblich
CEO, Ethisphere Institute

Risk assessment

Assessment of risk of modern slavery within our organisation

In 2017, we increased the detail of our risk assessment of our business by directly mapping 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.

We also considered the risk of modern slavery within our recruitment processes. 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.

As we reported last year, 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.

Our commitment to the ILO Fundamental Principles of eliminating discrimination in respect of employment and occupation, is reflected in our “Call it Out” campaign (following on from “#Me too”) run by our HR and Employee Relations experts. The campaign included training 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.

In 2017, we achieved EDGE certification, the leading global assessment methodology and business standard on gender equality in the workplace and were named in the Times Top 50 Employers for Women 2017.

Assessment of risk of modern slavery within our supply chain

The risk assessment of the supply chain mapped the risk of modern slavery by commodity supplied and location of supply. The risk assessment was applied to all suppliers to Capgemini UK plc registered on the Global Procurement System (GPS) and therefore covered 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.

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

In 2017, we trialled a new enhanced process in the UK to raise concerns, including a telephone hotline. We plan to roll out the enhanced process in 2018.

Due diligence

Our organisation

In our first Transparency Statement, we described one of the biggest areas of spend in the UK was 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 have ensured the standard terms and conditions on which we engage recruitment services make explicit reference to compliance with modern slavery legislation as well as a general compliance with English law in terms of right to work checks.

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 an 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 as set by the Living Wage Foundation.

Our "Raising Concerns Procedure", open to everyone who works for or with Capgemini, is available to seek advice and guidance or to anonymously report concerns relating to ethics and compliance issues. In 2017, we trialled a new enhanced process in the UK, including a telephone hotline to raise concerns. We plan to roll out the enhanced process in 2018.

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 local Forums and our National Works Council 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 National Works Council regarding GDPR - protecting individual privacy is of huge importance to Capgemini.

Our supply chain

From September 2016 to May 2018 all our active suppliers have been required to complete our new 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 1500 suppliers we assessed, 456 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 tool was a Finalist in the 2018 Edie Sustainability Leaders Awards – Sustainability Innovation: Standards, System and Software category

1,500

suppliers assessed since 2016 to May 2018 (100% of live suppliers)

255

new suppliers assessed in 2017

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, 351 of those 456 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 2018/2019 we will:

- 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 country and commodity to identify any reduction or emerging risks.
- Identify any opportunities where we can extend or increase our impact and influence.

In 2017, we 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. For 2018, we will 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 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 and 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](#).

At Capgemini, we foster an inclusive **workplace culture** that offers every employee the opportunity for a successful and rewarding career—not just a job.

In 2017, we developed and enhanced an Active Inclusion programme with the resolute intention of enabling our people to feel valued, included and empowered. This allows us to nurture highly functioning teams which grow innovation.

Our commitment to people extends to our community engagement programme at both Group and UK level. We work with community partners and schools to help young people, from diverse backgrounds develop the skills, particularly digital skills, needed to gain work.

Through our provision of payroll giving, our employees continue to support the Naandi Foundation's Nanhi Kali initiative, which funds girls' education in India. We believe that education is a transformative force that can lift families out of poverty and help them avoid the sort of employment which is more at risk of modern slavery. Our people give around £15,000 each year in support of approximately 250 young girls in both primary and secondary education.

In 2017, we scheduled our Group Community Week to coincide with the United Nations International Volunteer Day so we can recognize our employees' fundraising and volunteer work along with the millions of other volunteers around the world.

During our 50th anniversary, we created a special challenge with purpose, Move50, which encouraged our 200,000 people across our Group to get moving to raise money for education initiatives, tracking their run, cycle or walk through an app and sharing their movements on social media. Collectively we moved 415,696 km donating €100,000.

In the UK, we have an established community engagement programme supporting local volunteering and fundraising initiative. Last year we supported over 40 charities. We also reached out to over 5000 young people through our focus on raising aspirations and developing skills.

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** 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

In 2017, we completed an internal training programme focussed on the Procurement, Legal and HR teams. The purpose of the training was to highlight the range of modern slavery offences and how and where these could be risk factors to Capgemini and our clients and was tailored to make the training relevant and appropriate to each team. We are now considering rolling out a more general programme to raise awareness of modern slavery across our entire employee population.

In 2017, we set up a cross-functional team with representatives from our CR&S, Procurement, HR, Facilities, Corporate Risk and Legal teams to monitor the way we address modern slavery. We set up 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

As we accelerate into a new digital era, which brings both disruption and opportunity for organisations across the world, this steadfast commitment to responsible and sustainable business becomes even more vital and impacts every aspect of our operations, from the way we manage our clients' data, to how we source our soap and the wages we pay our people. This year we have five priorities and we will:

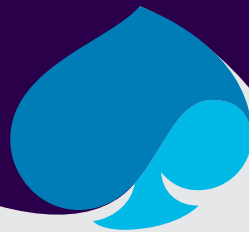
- 1** Continue to ensure that our values and ethics are embedded across our business, in the way we interact with our clients, our employees and our suppliers.
- 2** Develop and support supplier understanding of the importance to Capgemini of combatting modern slavery.
- 3** Review active suppliers whose 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.

*This Transparency Statement was approved by the board of directors
for Capgemini UK plc on July 11, 2018*



A stylized, handwritten signature of Christine Hodgson in blue ink.

Christine Hodgson
Capgemini UK plc Chairman
Group Head of Corporate
Social Responsibility.



About Capgemini

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. 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. It is a multicultural company of 200,000 team members in over 40 countries. The Group reported 2017 global revenues of EUR 12.8 billion.

Learn more about us at

www.capgemini.com

People matter, results count.

The information contained in this document is proprietary.
©2018 Capgemini. All rights reserved.