

Transparency Statement

Made under Section 54 of the 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 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 2019.

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 2020, the Capgemini Group was named as one of the World's Most Ethical Companies ® by the Ethisphere Institute for the eighth consecutive year. This highlights our long-term commitment to ethical business practices; and we are one of only 3 honourees in the Consulting Services industry. In 2020, 132 organisations were recognised spanning 21 countries and 51 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.

Our UK Country Board supports this Transparency Statement.

 We are proud of our global recognition as one of the world's most ethical companies. I am committed to ensuring our unequivocal compliance to the Modern Slavery Act.

This is exemplified by our continued commitment to being vigilant and diligent to detect and prevent slavery throughout our business and within the wider ecosystem."

Paul Margetts

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



Congratulations to everyone at Capgemini for earning

this recognition.

This is a moment to acknowledge the leaders working to advance corporate cultures defined by integrity and affirm those companies contributing to broader societal imperatives and the greater good."

Timothy Erbllich

CEO, Ethisphere Institute

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 organisations to realise their business ambitions through an array of services from strategy to operations.



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.

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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 subcontract 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 and the OECD guidelines for Multinational Enterprises.



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.

“Capgemini is committed to fostering a positive and inclusive workplace where all our people can work together with openness, trust and respect.”

Frances Duffy
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. 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, we launched “Respectfully Us” at the end of 2019. This programme encourages our employees to call out any inappropriate behaviour and educates our people managers on how to support colleagues to do so. We have also trained independent Inclusion & Respect Ambassadors across the company. Employees can approach the Ambassadors informally with any concerns to look at ways to resolve inappropriate behaviour in a respectful and open way.

There is also an alternative anonymous route available to all colleagues where they can raise any ethics concerns (for example relating to bribery, corrupt practices, or unfair competition) via the use of ‘[SpeakUp](#)’, a 24x7 phone-based and web-based helpline. This is regularly promoted across Capgemini.

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 (COVID-19) 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, Right to Work checks have been adjusted, on government advice, due to coronavirus. As of 30th March 2020, changes were introduced to conduct checks via video conferencing.

A recent addition to our HR practices is the application of measures to our payrolls with regards to the detection and prevention of debt bondage amongst our employees. This activity is now one of our Key Performance Indicators described on page 9. The outcomes will be reported in future Transparency Statements.

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 all employees engaged at Capgemini UK sites, the Living Wage.

All Capgemini's purchases are governed by
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

“Capgemini has long been committed to ensuring there is no room for modern slavery in any form in its vendor ecosystems and supply chain. It is not only a matter of regulations or compliance; it is above all one of our core ethical values and a genuine concern for a company with the utmost ethical standards. Our employees, partners, clients and shareholders are all driving and promoting this policy making it every day’s reality”

Emmanuel Erba
Group Chief Procurement Officer

1,948
suppliers assessed since 2016 (100% of live suppliers)

198
new suppliers assessed in 2019

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 15 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. 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 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 suppliers. Our UK procurement team have all successfully passed the Chartered Institute of Procurement and Supply (CIPS) ethical training module.

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%. Every new supplier’s Corporate Responsibility & Sustainability (CR&S) credentials are assessed against Capgemini’s principles as well as international, national and local legislation via an online survey and all current suppliers are expected to complete an assessment annually.

The risk assessment of the supplier base enables us to map the risk of modern slavery by commodity supplied and location of supply. The risk assessment is applied to all suppliers to Capgemini UK and therefore covers suppliers to all areas of our business and organisation.

“ Our bespoke Supplier Profile Assessment is an invaluable tool, that helps protect against potential slavery in our Capgemini UK supply base. Using the assessment tool, we identify and contact Suppliers that may benefit from guidance and additional information enabling them to be modern slavery aware”

Aidan Curry
UK Procurement
Country Manager

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 leading to modern slavery.

All procurement processes are 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 undertaken on Capgemini UK’s annual spend in order 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 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 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 continuous improvements

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

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

In 2020 Capgemini UK was awarded the CIPS Corporate Ethical Procurement and Supply Kite Mark.



Key Performance Indicators

In 2020 we developed KPI targets as set out below. They are intended to give transparency to our aspirations, actions and performance. We will be monitoring, tracking and reporting against the following KPIs. The first reporting of these KPIs will be in our 2021 Transparency Statement.

- 100% compliance with Capgemini's standards in relation to modern slavery for all active suppliers
- 100% of suppliers assessed via Capgemini's Supplier Profile Risk Assessment tool
- Transparency Statement published on Capgemini's external website within six months of the company's financial year end
- Annual mapping of supply chain spend and risk
- Conduct annual due diligence on procurement policies, processes and practices
- All available Capgemini UK employees are required to undertake the bespoke modern slavery mandatory training
- Debt Bondage detection measures conducted on each payroll run

Creating awareness

We have created a bespoke mandatory training module for all Capgemini UK employees and contractors.

All UK procurement professionals undertook the CIPS Ethics Training. This training ensures that all staff who select and manage suppliers are trained in ethical sourcing and supplier management. Capgemini UK have signed a Statement of Commitment to ethical sourcing and management of our suppliers.

On Anti-Slavery Day 18th October 2019 Capgemini published articles and educational links on our intranet site, visible to all c.220,000 Capgemini Group team members. Capgemini is committed to a similar awareness campaign to mark Anti-Slavery Day in 2020.

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.

Supplier awareness and education

360 of Capgemini UK suppliers who failed to meet our strict modern slavery standards 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.

We have also created an external training module which will be available to all our suppliers and their employees and their supply chain.

Due diligence

To improve our position with regards to modern slavery we have developed the methodology to annually review our procurement policies and procedures to identify opportunities for improvement.

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 any and 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 the outcomes will be reported in future Transparency Statements.



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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: Diversity, 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 entered into relationships with The Prince's Trust and Schools Outreach programme. Our new relationship with Code Your Future in the UK aims 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.

You can find out more about the extensive work we do to ensure 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](#).

Future commitments

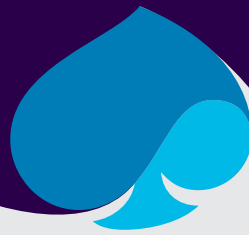
In line with Capgemini's commitment to responsible business and zero tolerance of modern slavery, these are the activities we will focus on in the coming year

- Inform Capgemini's Country Board about how the KPI's have been met
- Provide outcomes and action plans from annual due diligence
- Develop specialised and focussed training for specific groups
- Develop a procedure for managing reported concerns
- To identify opportunities and develop action plans for continuous improvement
- Introduce modern slavery awareness to all new employees as part of Capgemini UK's 'BeInspired' induction programme.

This Transparency Statement was approved by the Board of Directors
for Capgemini UK plc on 4th June, 2020



Julie Mangan
Company Secretary



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 organisations 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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