



Capgemini UK Modern Slavery 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 2021.

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“ If we knew how close we were to exploitation, we'd be uncomfortable. ”

Dame Sara Thornton
Outgoing Independent Anti-Slavery Commissioner

Introduction

“ My focus is to drive the education and awareness through the business and our supply chain, to consistently improve and adapt our processes to ensure potential risks can be identified and eradicated. As a business, and as ethically conscious individuals, we need to be constantly alert to the signs of modern slavery, even in our everyday lives. ”

Maria Hughes,
UK Modern Slavery Lead

2021 saw some giant leaps forward regarding social rights, and specifically modern slavery, within Capgemini UK, and across the Group:

- Appointed the Group's first **dedicated Modern Slavery Lead** in the UK, Maria Hughes, who will drive the anti-slavery program for the UK business and ensure a joined-up approach across Capgemini Group
- Capgemini UK launched **mandatory training** for all available UK employees to provide education and awareness and, importantly, how to identify the signs of modern slavery
- Launched Capgemini Group's [ESG Policy](#). ESG (Environmental Social Governance) is not new to Capgemini, we have collectively accomplished great results through our Architects of Positive Futures program. ESG is embedded in our corporate strategy focusing on eight ESG priorities material for a shared success
- Capgemini UK's Country Board approved a donation to be made available in support of modern slavery charities
- Capgemini Group launched its [Human Rights Policy](#). We are deeply convinced that technology must be made by humans for humans, we strive to protect and promote human rights across our value chain. As a leading ethical company, our commitment to protecting and promoting human rights is engrained in our culture.

Capgemini's [seven Values](#) inspire our ethical culture, with people at the heart. In early 2022 for the tenth year running, Capgemini was named as one of the [World's Most Ethical Companies by the Ethisphere Institute](#).

Our pledge to conduct our business in an ethical and responsible way is crucial to our continued success. 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.

Capgemini Group has a zero-tolerance approach to bribery, corruption, and human rights abuses. We are committed to taking appropriate steps to do what we can to detect and prevent any forms of slavery, however we can never guarantee that our business and supply chain is completely free of modern slavery. Training and awareness have been a key area of focus thereby ensuring both our employees and tier 1 supply chain is fully alert to the scale of the issue, the Modern Slavery Act 2015 and as modern slavery is not just a 9-5 issue, how to identify instances of modern slavery and where to report it.

This Transparency Statement describes our business and supply chain, our policies covering ethical behaviours, and our standards. It describes the steps we have taken to, insofar as is possible, ensure that modern slavery and human trafficking is not taking place in any part of our supply chain or in our own business.

Capgemini's Business and Supply Chain

“ Being recognized as one of the World's Most Ethical Companies for a decade now illustrates that we strive hard to build a strong ethical culture at Capgemini. We have extra responsibility that comes with our global stature and we take it very seriously. As an employer of choice and a trusted business partner to many organizations across the world, it is critical for us to follow the highest ethical standards in everything we do. ”

Aiman Ezzat, CEO,
Capgemini Group

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.

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 340,000 team members in over fifty countries.

The Board of Directors sets the strategic direction of the Company and the 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.

Capgemini UK is comprised of Market Units and Local Practices:

- **Market Units** comprise Consumer Products, Retail & Distribution, Energy, Utilities & Chemicals, Manufacturing, Automotive & Life Sciences, Public Sector and Telco, Media, Technology & Services, Sogeti and Financial Services
- **Local Practices** comprise Application Management Services, Business & Technology Solutions, Custom Software Development, Digital Customer Experience and Packaged Based Solutions.

We are part of a global network of Capgemini entities in the 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. In our risk assessment and due diligence activities we have distinguished between members of the Group in our supply chain and third-party suppliers. This is because of each Group company to whom we may sub-contract will adhere to our Group policies and governance processes. They are founded on and practice the same values and ethics, and we share a commitment that ethics and integrity are fundamental and uncompromising elements of the way we conduct our business.

The nature of our business means that our sourcing activities, in the majority of cases, tends to be with suppliers that are trading from the UK or low risk countries. All suppliers are fully assessed as part of their onboarding and selection process.

[Capgemini Group Code of Business Ethics](#) 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. Since 2016 our ethical principles, including specific obligations referring to modern slavery, have been incorporated within all our contracts, purchase orders, supplier selection and performance procedures, and remain a prerequisite for doing business with Capgemini.

Capgemini UK has an established employee representation body, **Capgemini's Works Council (CWC)**, who are directly elected by UK employees. Employees can raise questions, issues, or concerns at any time with their representatives; the CWC ensures that the employee voice is heard and has real credibility when discussing issues with senior leaders.

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.

Further details about Capgemini UK can be found [here](#).



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.

“ At Capgemini, seven Values inspire our ethical culture. Our central team, supported by a global network of ethics officers, works continuously to strengthen and refine our framework and approach, in order to foster ethical questioning, reasoning and actions. In this way, each of our employees contributes to our ethical culture. We seek to extend the benefits of this culture to all our stakeholders and the wider community. We recently formalized our longstanding commitment to human rights in a Group Human Rights Policy, and we are proud to have been recognized - for ten consecutive years - as a World's Most Ethical Company™”

Anne-Violaine Monnié-Agazzi, Group Ethics Officer

Organisational policies

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, that we run monthly, tells us how important this is to our colleagues and that their experiences are very positive.

All policies that are published as part of our business are approved and signed off by UK leadership.

Our [Supplier Standards of Conduct](#) sets the minimum commitment Capgemini expects from its suppliers. The standards of conduct contain our principles with regards to compliance with international, national and local law, human rights, labour rights and modern-day slavery. It also outlines the obligation of our suppliers to conduct their business with the highest standards of integrity, avoiding all forms of corruption, bribery, extortion or embezzlement, and unfair business practices.

In 2021 the Group launched its [Human Rights Policy](#), endorsed by our Global CEO Aiman Ezzat, it summarises our commitment, our program and our governance to continue to protect and uphold human rights.

Capgemini has always been a values-based organisation: guided by our Group Values, we seek to adopt an ethical mindset and ethical behaviour in all our daily business activities. Our [Code of Business Ethics](#) formalizes and explains our Values and principles of action.

Our [“SpeakUp” policy](#) details our ethics helpline and 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 Human Resources (HR) investigators. SpeakUp is voluntary, confidential, and allows anonymity, unless stated differently by a country's local law which is detailed within the policy. 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 organisational 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; not in compliance with applicable laws, or that may significantly affect vital interests of Capgemini and its affiliates.

“Today, business leaders face their greatest mandate yet to be ethical, accountable, and trusted to drive positive change,” said **Ethisphere CEO, Timothy Erblich**. “We continue to be inspired by the World’s Most Ethical Companies honorees and their dedication to integrity, sustainability, governance, and community. Congratulations to Capgemini for having earned the World’s Most Ethical Companies designation for ten years in a row, during which time the organization has grown exponentially without compromising its high ethical standards.”

Anyone who raises or helps to address an alert on SpeakUp in good faith is protected by our non-retaliation policy. Substantiated alerts result in appropriate remediation actions including disciplinary action or process improvement.

Building on our commitment to foster a positive and inclusive workplace, our internal “**Respectfully Us**” programme, launched in 2019, drives 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 trained independent inclusion & Respect Ambassadors across the UK business. Employees can approach the Ambassadors informally, as trusted advisors, with any concerns to look at ways to resolve inappropriate behaviour in a respectful and open way.

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. This commitment is also shared by our Workplace Services providers who have signed up to contractual obligations to pay the Living Wage to all Capgemini UK employees.



“ Along with specific modern slavery questions, our bespoke Supplier Risk Assessment system asks relevant, proportional questions, which provides us with invaluable data highlighting the strengths and potential risks in our supply chain. Ultimately, we may cease business with a supplier if we cannot resolve those risks, however we will always collaborate to increase their knowledge and understanding and endeavour to arrive at a satisfactory resolution. ”

Graham Rooke,
Sustainable
Procurement

Due Diligence / Assessing and Managing Risk

We conduct 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.

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. Following the review on the 2021 spend this identified that we have had 5 suppliers in 3 high risk countries (China, India, and Brazil). All have been thoroughly assessed and all were found to be acceptable. 97% of the suppliers registered in the assessment system are from the countries whose governments were judged to be responding most to modern slavery, 2% are from countries not particularly known for slavery, 1.5% are from countries that we know there is slavery. We have no suppliers that are from countries in the top 10 who have the highest prevalence of slavery (source: Global Slavery Index 2018).

We recognise that the nature of our business means that we have some purchases that have a higher risk because of what they are, where they are made or both. In all these cases we are taking preventative actions and making evidential enquiries at every stage of the procurement process.

Since 2010 all active suppliers to our UK business have a contractual obligation to complete our [on-line assessment](#). From 2016 the bespoke tool assesses the full breadth of Corporate Responsibility & Sustainability (CR&S) activities as well as the corporate compliance of our suppliers. It includes questions, requiring evidence, about their modern slavery policies, actions and intended future activity. Our dedicated sustainability compliance team manage all the risk assessments and for those suppliers that do not give answers that meet our expectations, they are re-contacted, and resources provided for them to self-educate, to understand and consider their ethical and business obligations. The importance to Capgemini, and our clients, of taking a vigilant stance against slavery is communicated and how we expect our tier 1 suppliers, and all subsequent tiers, to be aligned with our ethical standards, and provide resources for them to self-educate, to understand and consider their ethical and business obligations.

Capgemini UK has assessed its entire supplier base against our [Core Principles of Sustainable Procurement](#) via our custom-made, on-line assessment tool. More than 90% of suppliers were found to meet our sustainability criteria: we no longer conduct business with the remaining 10%.

For more than 17 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. All suppliers must accept and adhere to our [Supplier Standards of Conduct](#), which includes the stipulation that the standards be flowed down through their supply chain.

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 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. Prevention of modern slavery is also captured within our agreements with our recruitment agencies.

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 as stipulated within our Supplier Standards of Conduct.

In addition, Capgemini UK has also applied measures as part of our payroll process with regards to the detection and prevention of debt bondage amongst our employees. This is also tracked via a KPI.

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 **Right to Work** check on all new joiners. Previously these checks were undertaken face to face, however from March 2020 they were moved to video conferencing and continue to be so. As part of the check, identification documentation is shared over video, at no point is the original documentation held or removed from the applicant. It is anticipated that this check will be moved to a digital solution during 2022.

Every year Capgemini UK completes the Achilles UVDB (Utilities Vendor Database Service) Audit category B2 for companies providing services into the utilities sector. This is an independent audit which assesses all aspects of our management systems and includes questions relating to Corporate Social Responsibility covering employment practice and human rights, working hours, workplace safety, sourcing of goods and products, for which we achieved 100%.

Capgemini UK participated in the Cabinet Office Modern Slavery Assessment Tool (MSAT) and once again achieved a green rating.

We have a robust response in our policies and processes, which includes board level support, to ensure that we are vigilant, committed to preventing and detecting any potential incidences; we have a zero tolerance of slavery. There is more we can and will do.



Key Performance Indicators

The KPI targets developed below were intended to give transparency to our aspirations, actions, and performance. Our 2020 Transparency Statement was the first statement in which we monitored, tracked, and reported against them.

KPI	2020	2021
100% Compliance with Capgemini's standards in relation to modern slavery for all active UK suppliers	Compliance rate is 95.5% and we continue to work with those suppliers who we believe have the potential to comply	91% of reviewed and newly assessed suppliers comply - we are working with the remaining 9% with education and awareness
100% of suppliers assessed via Capgemini UK's supplier profile risk assessment tool	100% - all suppliers are now assessed as part of standard on-boarding and annual review supply chain processes	100% of suppliers are fully assessed
Transparency Statement published on Capgemini UK's external website within six months of the company's year-end i.e., by 30th June	The 2019 Transparency Statement was published on 4th June 2020	The 2020 Transparency Statement was published on 1st June 2021
Annual mapping of supply chain spend and risk for modern slavery	Annual due diligence exercise has been conducted on the 2020 spend. 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 upload our zero-tolerance approach	The spend profile has not changed significantly either in geography or commodities as a result of acquisitions. The annual spend has increased since the last exercise
Conduct annual due diligence on procurement policies, processes, and practices	Annual due diligence is now conducted on all policies, processes and practices	Annual due diligence undertaken to ensure no unnecessary pressures are placed on suppliers, especially around payments. Capgemini UK has been a signatory of the Prompt Payment Code since 2013
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	Training launched in June 2021, as at the beginning of January 2022 the completion rate was 78%. The percentage completion is monitored monthly to ensure an upward trajectory
Debt bondage detection measures conducted on each pay run	We can confirm that the appropriate detection measures are being conducted on each payroll run	This continues to be undertaken monthly. To date no issues have been identified

“ We are committed to combatting modern slavery with our policies, practices and people reflecting our core values of integrity and respect. ”

Carolyn Miller
UK HR Director



**0817 / VALID TO
24.05.2023**

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

Training

In 2021 Capgemini UK launched its bespoke mandatory training module for all available employees. The training enables employees to:

- Understand the current impact of slavery both globally and in the UK
- Know how to recognise the signs of modern slavery
- Be aware of the actions Capgemini UK are taking; and
- Be able to act, if necessary, to safeguard others

The training also links out to an [external survey](#), which will inform you of the slaves potentially working for you based on your lifestyle. Awareness of this training is highlighted as part of our induction process, and the completion percentage is monitored monthly to ensure a continual upward trajectory.

In addition, since 2017 we have maintained a dedicated email address that employees can use to email questions or concerns, or indeed ideas and experiences, around modern slavery. The email address modernslavery.enquiries.uk@capgemini.com is monitored daily by Capgemini UK's Modern Slavery Lead, Maria Hughes. A key part of Maria's role is to ensure a high level of continual awareness across the business; therefore, a communication plan is being implemented and Maria is delivering customised awareness to the various areas of the business that makes up Capgemini UK.

Our UK Procurement team successfully undertook the Chartered Institute of Procurement and Supply (CIPS) ethical training module for the third year running. This training ensures that all employees who select and manage suppliers are trained in ethical sourcing and supplier management. CIPS Corporate Code of Ethics is voluntary, 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. Capgemini UK is listed on the associated [CIPS Corporate Code of Ethics](#) register.

Capgemini UK's dedicated Sustainable Procurement team work with all UK suppliers that fail to meet our strict modern slavery standards, providing education and awareness. Any actions that are committed to by our UK suppliers will be followed up to ensure continual improvement, however, we recognise that it is not always possible to resolve issues, and in those circumstances, we may choose to end our business relationship.

Commitments

In our last two Transparency Statements we captured commitments as a responsible business in relation to our zero-tolerance approach regarding modern slavery, including some future commitments. To ensure complete transparency and consistency we have reported progress against each one below:

#	Commitment	2021 update
1	Inform Capgemini UK's Country Board about how the KPI's have been met	Country Board receive direct updates regarding progress against KPIs
2	Provide outcomes and action plans from annual due diligence	Following due diligence, no changes were required and there are no outstanding actions
3	Develop specialised and focused training for specific groups such as suppliers and contractors	Mandatory CBT launched for all UK employees in June 2021 Suppliers are provided bespoke awareness and education as part of their assessment should they require based on their responses and our own due diligence Discussions are ongoing regarding a suitable solution for our contractors
4	Develop a procedure for managing reported concerns	SpeakUp is the companies web and phone-based ethics concern reporting and incident management tool which is available to all parties both internally and externally. In addition, we have a specific modern slavery email address, modernslavery.enquiries.uk@capgemini.com for any questions or concerns any employees may have. Any issues raised will be captured in a central repository and monitored and tracked until a satisfactory resolution as per the process
5	To identify opportunities and develop action plans for continuous improvement	Liaising with parties both internally and externally to feed into our continual improvement strategy
6	Introduce modern slavery awareness to all new employees as part of Capgemini UK's 'Belnspired' induction programme	Modern slavery and the requirement to complete the mandatory training continues to feature as part of the new employee recruitment process
7	Capgemini plans to launch a new edition of the "Ethics@Cagepmini" mandatory training. This provides comprehensive guidance on all aspects of Values and Ethics	Launched early 2022
8	Our UK procurement professionals shall ensure Capgemini maintains the CIPS "Ethical Mark" accreditation	Our UK Procurement team continue to be CIPS accredited
9	NEW: Establish relationships and support modern slavery charities through volunteering opportunities	We will support and collaborate through our CR&S digital inclusion program
10	NEW: Build a network/working group/forum internally (UK and Group) and externally with other interested parties	These networks will provide insight and innovation to further drive the anti-slavery program, to share knowledge and experience, create a joined-up approach across our business and ensure continued best practice
11	NEW: Launch Human Rights training for all available Capgemini employees globally	Computer based training module to be developed and launched to provide education and awareness regarding our Human Rights policy



This Transparency Statement was approved by the Board of Directors for Capgemini UK plc on 30th June 2022



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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 everyday by its purpose of unleashing human energy through technology for an inclusive and sustainable future. It is a responsible and diverse organization of 325,000 team members in more than 50 countries. With its strong 55-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, fuelled by the fast evolving and innovative world of cloud, data, AI, connectivity, software, digital engineering and platforms. The Group reported in 2021 global revenues of €18 billion.

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