

Transparency Statement

made under s54 Modern Slavery Act 2015

Capgemini UK plc



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This statement sets out the steps Capgemini UK plc is taking to ensure that slavery and human trafficking is not taking place in its organisation and supply chains.



Introduction

The Capgemini Group's greatest asset is its people. Since its foundation in 1967, the Capgemini Group has conducted its business on an ethical foundation, encouraging and enabling its employees and suppliers to operate within the same principled framework.

Capgemini UK plc has a zero tolerance approach to bribery, corruption and human rights abuse. We do not accept that it is necessary for grave human rights abuses such as forced and compulsory labour, slavery, servitude and human trafficking to be part of today's modern businesses and supply chains.

We are committed to our employees, our clients and our suppliers 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 current policies covering ethical behaviours and standards and sets out the steps we are planning to take to ensure continuous improvement and resist complacency.

About Capgemini's business and Supply Chains



With more than 190,000 people the Capgemini Group of companies is present in over 40 countries and represents over 120 nationalities. This year, the Capgemini Group celebrates its 50th anniversary. A global leader in consulting, technology and outsourcing services, the Group reported 2016 global revenues of EUR 12.5 billion.

Capgemini creates and delivers business, technology and digital solutions to achieve innovation and competitiveness. We understand that business value cannot be achieved through technology alone; it starts with people. We believe this human-centred approach to technology enables our clients to respond successfully to complex and unpredictable challenges. A deeply multi-cultural organisation, Capgemini has developed its own way of working, the Collaborative Business Experience™, and draws on Rightshore™, its worldwide delivery model.

OUR SUPPLY CHAIN

Our supply chain supports both the delivery of our services to over 100 clients and our day-to-day business operations. In these activities we uphold our own exacting ethical principles and meet the standards of our clients.



For more than 10 years we have had a purchase order mandatory policy and a central purchasing system, (Global Purchasing System or 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 purchasing organisations and over a financial year about 1,500 of those suppliers are active in our ecosystems. We recognise our supply chain presents some risks and challenges and that we must exercise vigilance in respect of all human rights violations but in particular modern slavery and human trafficking.

Our sourcing activities are required to meet a wide range of differing needs that are constantly changing. We recognise that our suppliers with their own suppliers makes for a complex supply chain that affects our business and our clients' businesses. In the preparation of our first transparency statement, we have focussed on those sections of our supply chain that pose the greatest risk of modern slavery.

The Risk Assessment

Assessment of risk of modern slavery within our organisation

We assessed the risk of modern slavery in our UK business and considered it to be low. This is largely because the people that work in the IT and consulting arena tend to be skilled, with greater control over their careers. To support our employees, we have created robust people policies and practices which go beyond compliance and deliver enhanced benefits supportive of work and home life. We provide an inclusive and respectful work environment which embraces differences and welcomes all.

Capgemini UK plc is an accredited Living Wage Employer which means we voluntarily pay more than the national minimum wage. We offer a range of Health and Wellbeing initiatives to promote good mental and physical health. We work with a number of external organisations to benchmark ourselves against industry best practice and ensure that we are leading the way in terms of employee experience.

At Capgemini we understand the importance of enabling employee voice. We have long established employee representation bodies which represent every UK employee. All our people policies are discussed with representatives, which in turn, enables employees to contribute their views on issues which affect them at work.

Should anyone who works for or with Capgemini UK plc have a concern, they have access to various resolution methods including our Reporting Concerns Procedure to report any type of unethical behaviour. Anonymous reporting is supported and is available online and on the phone.

From time to time we engage specialist contractors; invariably skilled IT consultants to complement our people centred approach to technology and business solutions. These contractors include secondees from companies within the Capgemini Group who come to work with Capgemini UK plc clients in the UK. We also have a renowned Rightshore™ model where elements of services are sub-contracted to members of the Capgemini Group in India, China and Brazil. These members



of the Capgemini Group share the same ethical principles as Capgemini UK plc. Other types of temporary personnel are engaged through external agencies. These agencies go through the same rigorous procurement due diligence as any other supplier. We are considering ways we can improve the checks and balances already in place across all of our resourcing processes.

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. Conducting a risk assessment with a modern slavery focus enabled us to prioritise those suppliers of goods and services which posed the greatest risk of modern slavery. For example, a large percentage of external spend goes on the facilities management of Capgemini UK plc's offices. Personnel in this sector can be at greater risk of modern slavery offences. An action that we were able to take in respect of the working conditions of these personnel and as part of our accreditation to be a Living Wage employer, was to secure commitment from our facilities management suppliers to ensure that all personnel engaged in providing facilities management services at our UK premises are paid the Living Wage by 2017.

Our risk assessment showed that facilities management services include the supply of tea, coffee and cocoa. Such commodities are well known to be at high risk of modern slavery, especially child labour. We are working with our facilities management suppliers to investigate ways we can most effectively mitigate these risks.

The third area where we found a higher risk of modern slavery was in the supply of IT hardware. We have chosen to do business with many of our major suppliers because they are responsible suppliers and for IT hardware suppliers because they are members of EICC (Electronic Industry Citizenship Coalition) and or have close alignment to the Organisation for Economic Co-operation and Development (OECD) guidelines on responsible sourcing of conflict minerals and gold. These suppliers regularly report on the steps they have taken in relation to modern slavery, making it possible for us to track the progress being made in this industry.



Due Diligence

Since 2010, we have assessed every supplier against a range of ethical and environmental risks and in September 2016, our Supplier Profile Assessment Tool was updated with detailed questions measuring the engagement and actions taken by suppliers in respect of slavery and human trafficking in their own business and in their supply chain.

All our suppliers are required, in our standard Terms & Conditions, to sign up to and conduct their business in accordance with 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 supplier identification and selection process uses market knowledge and the expertise of our procurement personnel to scrutinise the previous performance record of any prospective supplier and their products and services before they are included in any selection activity.

The Supplier Profile Assessment Tool measures compliance with Capgemini's Supplier Standards of Conduct, and is repeated periodically. We also conduct audits of our suppliers and these can include physical audits on the supplier's site or at the points of delivery. An area for development will be for us to determine how best to develop the processes we have in place in order to comprehensively audit human rights and modern slavery compliance across our supply chain.



Policies - People Matter, Results Count

Capgemini UK plc has a clear statement on the importance of ethical behaviour underpinning its business ethos contained within a key employment policy. The policy reflects **Capgemini's core values**, and incorporates a requirement from employees to respect human rights, not to allow the use of forced or bonded labour and not to allow the use of child labour. "**Our Ethics for You**" illustrates our Group commitment to maintaining and promoting a sustainable ethical culture, and we believe it reinforces integrity and inspires our employees to act ethically.



Our commitment to our people culture programme was recognised by a place on the Top 300 companies in the Stonewall Workplace Equality Index.

Our Group's global approach to values and ethics ensured we were once again recognised as one of the World's Most Ethical Companies in 2017 by The Ethisphere® Institute.

Performance Indicators

Over the next few months, our cross functional team with representatives from our CR&S, Procurement, HR, Facilities, Corporate Risk and Legal teams, will look at how we can improve the way we address modern slavery and ensure that we are adopting a forward looking focus on prevention and mitigation of modern slavery issues within our business and supply chain.

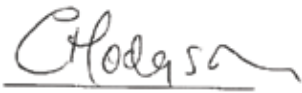
A key priority will be to meet our targets for general and bespoke training for employees and people who have an opportunity to directly implement our policies.

We will look at our current KPIs for suppliers to ensure they do not create undue influence and create a modern slavery risk.

We will also look at the ways we can assist and support those suppliers in our supply chain most at risk of modern slavery.



This statement has been approved by the board of directors for Capgemini UK plc.



June 2017



Christine Hodgson
Chair - Capgemini UK plc



About Capgemini

With more than 190,000 people, Capgemini is present in over 40 countries and celebrates its 50th Anniversary year in 2017. A global leader in consulting, technology and outsourcing services, the Group reported 2016 revenues of EUR 12.5 billion.

Together with its clients, Capgemini creates and delivers business and technology solutions that fit their needs and drive the results they want.

A deeply multicultural organisation, Capgemini has developed its own way of working, the Collaborative Business Experience™, and draws on Rightshore®, its worldwide delivery model.

Learn more about us at

www.capgemini.com