## 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 that Capgemini UK plc has taken and continues to take, to detect and prevent slavery and human trafficking in its organisation and supply chain.

The report has been fully reviewed, updated and constitutes Capgemini UK plc's transparency statement for its financial year-end 2024.



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# Introduction

**Modern Slavery is a stain** on humanity's conscience & a cruel reminder of how its many forms hide in plain sight, resulting in exploitation & coercion. I am proud of Capgemini's unequivocal efforts in the last decade to be transparent & proactive about the risks of Modern Slavery within our business & society. A critical focus on educating our team members has created awareness across our stakeholders so remains of paramount importance. **Capgemini** remains committed to delivering tangible & cumulative benefits to ensure freedom & dignity are core rights for all.

#### Julie Mangan,

UK Company Secretary

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

Training and awareness are key areas of focus thereby ensuring both our employees and supply chain are fully alert to the scale of the risk and how to identify instances of modern slavery and where to report it.

In 2024, we progressed our approach and supported the identification and education of modern slavery, by:

• Continuing our membership with <u>Unseen UK</u>, a registered UK charity, which will form a major part of our 2024/5 programme. Unseen provide safehouses and support in the community for survivors of trafficking and modern slavery. They run the UK Modern Slavery & Exploitation Helpline and work with individuals, communities, business, governments, other charities and statutory agencies to stamp out slavery for good.

• Continuing our UK Modern Slavery Working Group. This dedicated group focuses on identifying and embedding best practices across our business – see section 'About Capgemini's business and supply chains' for more information

• Publishing Capgemini UK wide internal communications – launching the 2023 transparency statement and continuing to raise further awareness across the UK business via mandated modern slavery training

Capgemini Group's <u>seven values</u> inspire our ethical culture, with people at the heart of our business. In early 2025 for the thirteenth year running, Capgemini Group has been named as one of <u>the World's Most Ethical Companies by the</u><u>Ethisphere Institute®</u>.

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.

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. This motivates us to continually review our business and supply chain to ensure that we remain vigilant to the possibilities and threat of modern slavery.

# About Capgemini's business and supply chain

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 business needs in the evolving world of AI, generative AI, 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.

In terms of corporate governance around Modern Slavery, the UK is represented on the Capgemini Group Board by a number of statutory directors. These statutory directors contribute to the setting and monitoring of the organisation's global direction and how we do business. The statutory directors of Capgemini UK plc have approved and reviewed this transparency statement.

The UK Country Board, is responsible for the operation of the UK business, has approved this annual Modern Slavery Statement and reviews progress against the stated KPIs. 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 in the UK is comprised of Market Units and Local Practices:

Market Units: Consumer Products, Retail & Distribution, Energy Transition & Utilities, Manufacturing, Automotive & Life Sciences, Public Sector and Telco, Media, Technology & Services, Sogeti and Financial Services.

Local Practices work across these Market Units and comprise Application Management Services, Domains, Custom Software Development, Digital Customer Experience and Packaged Based Solutions.

Global Business Lines are led globally with representatives from each geography. They work jointly with the Market Units to develop our portfolio and drive revenue and growth. They are comprised of Capgemini Invent, Business Services, Cloud Infrastructure Services, Capgemini Engineering and Insights & Data.

We are part of a global network of Capgemini entities within the Capgemini Group. From time to time, we utilise people from Capgemini Group entities either to be seconded to work in the UK or to provide services under our Rightshore® model. Each Group company will adhere to our Group policies and governance processes, sharing the same values and ethics, that are fundamental and uncompromising elements of the way we conduct our business. The UK Modern Slavery Working Group, launched in 2023 has representation from key areas – Corporate Risk, Human Resources, Recruitment, Corporate Real Estate Services, Procurement, Sustainable Procurement, Social Value Delivery, Sustainability, Legal, Personnel Security Vetting and Bid Management. All suppliers to the UK business 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 Group's seven 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 across the globe.

This transparency statement demonstrates one of the tenets of our responsible approach to business and our longstanding commitment to the principles of the <u>1948 Universal</u> <u>Declaration of Human Rights</u>, the International Labour <u>Organisation</u>, the <u>Organisation or Economic Co-operation and</u> <u>Development guidelines or Multinational Enterprises</u> 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.



## Organisational policies

At Capgemini in the UK, we pride ourselves on our inclusive culture where everyone is treated with respect and dignity. This is, actively promoted 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 monthly employee survey continues to reflect the importance that employees place on this, and feedback indicates a positive commitment to how we embed this in our business.

Note: all Capgemini UK policies, are reviewed according to legal/compliance requirements as well as changes in the wider socio-economic environment.

Our <u>Supplier Standards of Conduct</u> sets the minimum commitment Capgemini Group expects from its suppliers. These Standards contain our principles relating 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.

Our Group <u>Human Rights Policy</u>, endorsed by our Global CEO Aiman Ezzat, summarises our commitment, our actions and our governance to continue to protect and uphold human rights, which isfundamental to our approach to Modern Slavery. It supports the United Nations Guiding Principles on Business and Human Rights and recognises its duty to respect and provide access to remediation.

Capgemini Group 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 formalises and explains our values and principles of action.

Our SpeakUp reporting service provides an ethics helpline and is a natural extension of our values-based culture and high ethical standards. It is a web and phonebased ethics reporting, incident management and advisory tool, hosted by an independent service provider managed by Group Ethics and supported by our global network of Ethics & Compliance Officers and Human Resources investigators. It is available in 19 languages, is voluntary, confidential, presents an avenue through which modern slavery concerns can be raised and allows anonymity, unless stated differently by a country's local law which is detailed within the policy. It is made available by Capgemini Group to our team members, customers, suppliers, and business partners. SpeakUp is a commitment from Capgemini to listen to voices 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 raise alerts and/or ask for advice and guidance about actions or behaviours that appear to not align with our values; are non-compliant with applicable laws or have the potential to negatively impact Capgemini's interests and/ or those of its affiliates.

Anyone who raises an alert on SpeakUp is protected by our non-retaliation policy. Once an alert is reported in SpeakUp, the Group Ethics Office conducts an initial review following which it is assigned, by, the Group Ethics Office to the local Ethics & Compliance Officer. An exception to this process would happen in cases where there is an actual, potential, or perceived conflict of interest or the local Ethics & Compliance Officer to investigate the alert, or where the Group Ethics Office **Capgemini UK has** a dedicated Personnel Security Vetting team that administers and manages personnel security requirements for Capgemini employees and contractors. This team is DISA (Defence Industry Security Association) certified, and security cleared and plays a vital role in ensuring that potential and existing employees and contractors are vetted and verified in accordance with our approach to managing the corporate risk of "Insider Threat" and "Compliance". The capability falls within our UK Corporate Risk Management framework and plays an important role in identifying potential victims of modern-day slavery. This applies to preemployment checks, and in terms of ensuring that we have effective policies and processes in place to maintain appropriate monitoring and "aftercare" throughout the employee lifecycle. All new employees and contractors are required to pass pre-employment checks including right to work verification, criminal record, and identity verification. This is a key component for Capgemini UK in terms of combatting modern slavery.

**Colin Smith,** Director UK Corporate Risk believe that the alert is of such a severe nature that it must be investigated at Group level. SpeakUp ensures transparency across the entire process, including communication with the reporters, witnesses, and the investigation and leadership teams. Substantiated alerts result in appropriate remediation actions including disciplinary action or process improvement. Should modern slavery be uncovered as a result of a SpeakUp alert, appropriate remediation will be determined and aligned in accordance with international human rights standards.

Pulse is Capgemini Group's approach to valuing employee feedback and presents another opportunity to raise modern slavery concerns. It conducts short, monthly surveys around specific themes such as employee engagement which is embedded in our Corporate DNA, allowing our organisation to address concerns and thereby continually improve engagement and satisfaction levels.

• Pulse gives everyone a voice, as well as an opportunity to be involved in addressing issues.

• Pulse is anonymous but the employee may be offered the opportunity to discuss the feedback further with a member of the management team; their opportunity to contribute to the solution.

• Pulse captures feedback regularly. It is therefore always relevant, up-to-date, and aligned with changes in our organisation and its environment.

• For managers, this is an opportunity to create an environment of trust in which employees know that they can safely share their views, and where positive actions are taken in response.

• Managers have the option to ask employees if they are willing to share their contact details, thereby enabling direct meetings.

We also have an established employee representation body **Capgemini Works Council (CWC** who are directly elected by Capgemini 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.

Capgemini recognises that, from time to time, employees may need help in dealing with a problem and they might prefer to or decide that speaking with an independent and confidential expert or counsellor outside of the work environment is the best option. Capgemini offers an <u>Employee Assistance Programme (EAP)</u> that supports employees and their family living in the same household through any issues that arise – should they be work-related, personal, general or domestic.

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 also extends to our Workplace Services providers who have signed up to contractual obligations to pay the Living Wage to all Capgemini UK employees. We regularly monitor compliance via checks with the recruitment agencies.

Our Modern Slavery policies and processes provide for robust support, including Board level support, to ensure that we are vigilant and committed to detecting any potential incidences of Modern Slavery. We have a zero tolerance should slavery be identified as part of our processes.



I am so proud of what has been achieved for Capgemini in the UK by everyone who has contributed to our responses to the Modern Slavery Act. The first reactions to the publishing of the Act in 2015 were disbelief and lack of concern. Now the topic is embraced by our workforce, exemplified by their very positive comments, the takeup of the training and their willingness to participate.

It is not a project that will ever be complete, but I am confident that there is commitment and momentum to evolve and continually improve our contribution to resolve what is a global crisis; every day across the world, 46 million people are enslaved. **J** 

#### Melissa Thorpe,

Sustainable Procurement Team

# Due diligence / assessing and managing risk

Capgemini UK conducts annual due diligence on several aspects of our spend and supply chain.

• Applicable procurement policies are reviewed to identify areas where UK and Capgemini Group policies could be unintentionally putting pressure on our suppliers in a way which may lead to modern slavery risks. e.g. policies around payment terms. Capgemini UK has been a signatory of the <u>HMG Prompt Payment Policy</u> since 2013 and as a prime supplier to government departments the HMG Cabinet Office publishes the data of our compliance with the UK payment terms.

• The previous complete years spend of Capgemini UK is analysed to ensure that any overall variation, either by value, origin or commodity, that may have modified the risk to Capgemini, is identified and any required action is initiated. e.g. The acquisition of companies and the annual spend is also examined in detail within the context of modern slavery and our findings are;

- 99.9% of suppliers are based in countries that are deemed by the Global Slavery Index to have a good governmental response to modern slavery.
- None of our active suppliers to the UK business are in the top twenty countries with the highest prevalence of slavery.
- For added scrutiny the team looked at the lowest rated supplier countries in our supplier base: Czech Republic, Hong Kong, India, Israel and South Africa.
   Eight suppliers were based in these countries, each of which has been assessed or has been contacted by the Sustainability compliance team.

We acknowledge that modern slavery risk permeates every supply chain. To mitigate this risk, we require our suppliers;

• To integrate our contractual requirements into their own supply chains. We recognise that the nature of our business means that some purchases, by their very nature, present a higher risk in terms of exposure to Modern Slavery. We remain vigilant in terms of identifying such risks and take preventative actions and evidential enquiries at every stage of the procurement process.

- All suppliers to Capgemini UK must fulfil their contractual obligation and complete our <u>on-line assessment</u> as part of the selection, onboarding and annual supplier relationship management processes. The bespoke tool assesses the full breadth of Corporate Responsibility & Sustainability (CR&S) and Environmental, Social and Governance (ESG) activities as well as the corporate compliance of our suppliers including country and commodity risks. It includes, questions and requires evidence, about their modern slavery policies, actions and intended future activity. Our dedicated sustainability compliance team contact those suppliers that have not given answers that meet our expectations both from a best practice perspective and legal compliance. These suppliers receive self-education resources outlining their ethical and business obligations and its importance to Capgemini. As a follow-up, these suppliers are then contacted and requested to complete another survey to see whether their level of engagement and understanding has improved.
- Desktop audits are also undertaken on all our UK suppliers to confirm their responses within the assessment. The top-level question asked is "Are you aware of the Modern Slavery Act?", to ascertain their level of understanding and the steps they are taking or have taken to identify and prevent modern slavery in their supply chain.

- The data from our on-line assessment system indicates that in 2024, 98% of suppliers were found to meet our sustainability criteria. Those not meeting these criteria, are given two further opportunities to address these gaps, via self-education resources and a secondary survey to assess their level of engagement and understanding. If on both counts, the supplier has either not responded or not acted, then they are removed as Capgemini suppliers.
- Looking at our modern slavery standards specifically, by supporting and providing education, 98% of our suppliers have confirmed via acceptable completion of the assessment tool, their awareness of their obligations and are taking appropriate action, the remaining 2% are no longer suppliers to Capgemini.
- For more than 18 years we have maintained 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 <u>Supplier</u>
  <u>Standards of Conduct</u>, which includes the stipulation that the standards be flowed down through their supply chain.

• 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. This is a requirement of our Supplier Standards of Conduct.

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 of 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. Generally, these debts get recouped via recruitment fees, so Capgemini Group has therefore 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.

Capgemini adheres to the Employer Pays Principle, which outlines that employers will pay the full cost of any recruitment fees, and costs will not be borne to the worker. In addition to this, Capgemini has a preferred supplier list that agencies must sign up to and accept our terms and conditions. They must upload all profiles via our recruitment system, and all payments are checked before being paid via procurement.

Capgemini UK applies measures as part of our payroll process with regards to the detection and prevention of financial exploitation inc. debt bondage amongst our employees. As we are not permitted to carry out checks on employee bank details, our system ensures there is only ever a one-to-one relationship between an active bank account and an employee. In addition, if an employee leaves Capgemini and then later returns, a new record is created on our system requiring the employee to enter their bank details again.

In compliance with UK law, Capgemini UK conducts preemployment checks including right to work checks on all potential employees. As part of these checks, physical identification documentation is verified; however, at no point is the original documentation held or removed from the applicant.

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 participates annually in <u>the Cabinet Office</u> <u>Modern Slavery Assessment Tool (MSAT)</u> and continues to achieve a green rating (score of 93%, September 2024).



## 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 references an <u>external survey</u>, that highlights incidents of slavery according to lifestyle. Employees are expected to achieve a minimum of 80% in the training assessment. 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. As of 31st December 2024, the completion rate for this training was 97%.

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 <u>modernslavery.enquiries.uk@capgemini.</u> <u>com</u> is monitored daily by the Capgemini UK Modern Slavery Lead, Colin Smith.

As part of Capgemini's membership with Unseen UK, the training will, in 2025, undergo a thorough review to ensure it remains relevant and will be updated every 2 years.

For the past six years our UK Procurement team has successfully undertaken the Chartered Institute of Procurement and Supply (CIPS) ethical training module. 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 <u>CIPS Corporate Code</u> <u>of Ethics</u> register and our UK procurement team continues to ensure that Capgemini UK maintains the CIPS "Ethical Mark" accreditation.

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



Capgemini UK was again awarded the CIPS Corporate Ethical Procurement and Supply Kite Mark In 2024, Capgemini in the UK became the first business within the technology sector to join Unseen's Business Hub, demonstrating their proactive approach to tackling modern slavery, and setting an inspiring example for other businesses in the sector to follow.

During the last 12 months, Unseen have supported Capgemini with its modern slavery strategy through several activities, including a thorough review of its approach, as well as engaging with the working group.

We are delighted that Capgemini is continuing its membership with Unseen into a second year and we look forward to supporting them further with their strategy, including collaborating with other <u>businesses</u> on this topic.

#### Emily Roberts,

Business Engagement Manager, Unseen



## Key performance indicators

Some of the KPI targets developed below, have been updated since the 2023 statement and are 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.

КРІ	Progress against KPI 2023	Progress against KPI 2024
100% Compliance with Capgemini UK's standards in relation to modern slavery for all active suppliers to the UK business	98% - we no longer work with the remaining 2% as their contracts have naturally ended (measured via our procurement assessment tool)	We continue to maintain our 98% compliance rate (measured via our procurement assessment tool)
All new employees are required to undertake the bespoke modern slavery mandatory training – targeting a completion rate of 100%	As part of onboarding all new employees are allocated the modern slavery mandatory training which is monitored monthly by the UK Modern Slavery Lead	In 2024, the completion rate, which is monitored monthly, was 97%.
Annual mapping of supply chain spend and risk for modern slavery	Following review of 2023 spend and risk, the spend profile has not changed significantly either in geography or commodities, if anything the risk has decreased following the review against the updated Global Slavery Index. The annual spend has decreased slightly since the last exercise.	The UK 2024 spend saw an overall increase of 33%. There were substantial reductions in the IT & Telco and Travel categories. The magnitude of risk is calculated by an equation that uses spend as one of the multipliers therefore if spend is reduced, though the risk is still present, size and risk priority is reduced.

## **Continual improvement**

As part of the UK government's associated guidance for business, it is expected that year-on-year improvements are evidenced. Such improvements must show how a company is continuing to tackle the risks of modern slavery within its operations and supply chains.

Below, we share an update on the improvements captured in our 2023 Modern Slavery Statement and form the basis of our areas for improvement in the future:

Improvement	Status
Investigating the potential for specialised and focused training for contractors working within our business	A way forward has been identified, and implementation discussions have commenced.
Completing a gap analysis against BS 25700* and if necessary, create an associated action plan	Preliminary gap analysis undertaken, as part of Capgemini UK's collaboration with the charity Unseen UK this will be analysed in more detail as part of our 2025 program
Reviewing our internal mandatory computer- based training to ensure it remains relevant and up to date	Initial high-level review on the training has been completed and updates identified; a more detailed review and updates will form part of the program with Unseen UK during 2025
Launch a Modern Slavery training Refresher program in 2026 for all UK employees	The refresher program will ensure all existing employees who have completed the current mandated modern slavery training revisit their learning, every 2 years.
To create, develop and implement client specific Modern Slavery awareness training for non-UK Capgemini employees, working on Capgemini UK Accounts	Delivered training to non-UK employees working on a UK client Account. Develop further as a training resource to utilise for future requests.

## \*British Standard 25700:2022 provides guidance for organisations to address the risk of modern slavery, including prevention, identification, mitigation & reporting.

During 2024 we continued to improve our anti-slavery program by partnering with the charity Unseen UK. We intend to continue working with Unseen in, conducting a detailed analysis against BS 25700 and refreshing our employee training.

This Transparency Statement was approved by the UK Board of Directors for Capgemini UK plc on 30th June 2025



Julie Mangan UK Company Secretary, julie.mangan@capgemini.com

June Manpan



**Colin Smith,** Director UK Corporate Risk and Capgemini UK Modern Slavery Lead colin.d.smith@capgemini.com

#### About Capgemini

Capgemini is a global business and technology transformation partner, helping organizations to accelerate their dual transition to a digital and sustainable world, while creating tangible impact for enterprises and society. It is a responsible and diverse group of 340,000 team members in more than 50 countries. With its strong over 55-year heritage, Capgemini is trusted by its clients to unlock the value of technology to address the entire breadth of their business needs. It delivers end-to-end services and solutions leveraging strengths from strategy and design to engineering, all fueled by its market leading capabilities in AI, generative AI, cloud and data, combined with its deep industry expertise and partner ecosystem. The Group reported 2024 global revenues of €22.1 billion.

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