

# 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 (Capgemini) has taken and continues to take, 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 Jan - Dec 2025. This statement was approved by the Capgemini's statutory directors on - 26th June 2026.

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# Introduction

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 ensure that modern slavery and human trafficking is not taking place.

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

In 2025, we progressed our approach and supported the identification and education of modern slavery, by:

- Communicating the launch of the 2024 Transparency Statement and the 2025 UK Modern Slavery Act Policy and marking Anti-slavery day by reminding our people of the importance of fighting modern slavery.
- Reviewing and updating the existing mandated modern slavery training. In July 2026 we will launch our new mandated training for all new UK employees, alongside a refresher programme for existing employees.
- Continuing our membership with [Unseen UK](#), a registered UK charity, which forms a major part of our 2026 program. Unseen provide safehouses and support in the community for survivors of trafficking and modern slavery. Unseen runs 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 has been pivotal in supporting the development of the updated Modern Slavery eLearning as well as launching the modern slavery communications strategy.

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.

**“ 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. ”**

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**Julie Mangan,**

UK Company Secretary

# About Capgemini's UK business

Capgemini is a global leader in consulting, digital transformation, technology, and engineering services. The Capgemini 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 Capgemini 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 421,000 people in over fifty countries.

In terms of corporate governance around modern slavery, the UK is represented on Capgemini's Group Board by several statutory directors. These statutory directors, who are from across the business, contribute to the setting and monitoring of the organisation's global direction. This statement was approved by the Capgemini's statutory directors on - 26th June 2026.

The UK Country Board is responsible for the operation of the UK business and has approved this Transparency Statement and reviews progress against the stated KPIs. It takes decisions on the major issues concerning the day-to-day operation and the future of Capgemini, to promote sustainable value creation for its shareholders and all stakeholders.

Capgemini UK plc 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 and Technology & Services, Sogeti and Financial Services.

**Local Practices** work across these Market Units and comprise Application Development and Maintenance, Domains, Cloud and Custom Applications, 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, Cloud Infrastructure Services, Business Services, Capgemini Engineering and Insights & Data.

Capgemini UK is part of a global network of entities within the Capgemini Group. From time to time, we utilise people from other entities either to be seconded to work in the UK or to provide services under our Rightshore® model. This model is a Capgemini principle that we will place work in the right location to deliver maximum client value based around their specific needs. Each entity 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, which meets quarterly, 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.

[Capgemini Group Code of Business Ethics](#) describes the importance of ethical behaviour which underpins our business ethos. It reflects Capgemini Group'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 our 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 world.

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 can be found [here](#).



# Organisational policies

At Capgemini, 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 people, our clients, and in the market as a truly inclusive organisation where everybody feels valued and included. Our monthly employee survey (Pulse) continues to reflect the importance that employees place on this, and feedback indicates a positive commitment to how we embed this in our business.

[All Capgemini policies](#) are reviewed regularly according to legal/compliance requirements as well as changes in the wider socio-economic environment.

[Our Supplier Standards of Conduct](#) sets the minimum commitment the Capgemini Group expects from its suppliers. It was updated in 2024 to be fully aligned with the Group's Human Rights Policy commitments. These Standards reflect 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. For further details, please reference the Supplier Standards of Conduct.

Our Group [Human Rights Policy](#), endorsed by our Global CEO Aiman Ezzat, summarises our commitment, actions and governance to continue to protect and uphold human rights, which is fundamental 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. In 2026, we will launch our updated Human Rights Policy.

Capgemini Group has always been a values-based organisation. Guided by our [seven Values](#), Honesty, Boldness, Trust, Freedom, Fun, Modesty, and Team Spirit, we 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 24x7 web and phone-based (UK +442038850064) 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 via the SSC, 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

“*At Capgemini, our seven Values continue to guide how we work and the choices we make. Acting ethically and respecting human rights is a responsibility shared by everyone across the Group and reflected in our everyday actions and behaviors. Our human rights policy formalises our approach to respect human rights across our value chain and shape how we engage with our internal and external stakeholders. We recognize that building and sustaining an ethical culture is an ongoing journey, requiring constant attention, openness to challenge, and collective effort as we continue to learn and improve.*”

**Noelle Davies,**  
Group Ethics Leader



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 for the local Ethics & Compliance Officer to investigate the alert, or where the Group Ethics Office 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. To date, there have been no modern slavery cases reported via SpeakUp.

Pulse is Capgemini Group's approach to valuing employee feedback and presents another opportunity to raise modern slavery concerns. It conducts short, monthly surveys which include questions that measure employee engagement, the experiences that drive engagement and open-ended questions on specific topics and events. The answers provided allow Capgemini to address concerns and continually improve engagement and satisfaction levels. On average 37% of our employees respond to the monthly Pulse survey in Capgemini UK.

- Pulse gives everyone a voice, as well as an opportunity to be involved in addressing issues.
- Pulse is anonymous but the employee maybe 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.

The Pulse survey has led to various recognition initiatives, such as the GetCELEBRATING program at the Group level. The program is part of Capgemini's broader people-centric strategy to recognise contributions and support the growth of its employees.

We also have an established employee representation body **Capgemini Works Council (CWC)** who are directly elected by Capgemini 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, our people 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 [Employee Assistance Programme \(EAP\)](#) that supports our people and their family living in the same household through any issues that arise – should they be work-related, personal, general or domestic. In the case of non-UK Capgemini employees, external agencies are contacted as needed.

Capgemini 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 Plc employees.

We are currently paying an enhanced hourly rate which meets the cost of living. From a payroll perspective, we regularly monitor compliance through a range of controls, including periodic assurance checks, review of pay rate data, and verification processes to ensure no employee falls below the National Minimum Wage.

As part of our annual cycle we engage with our Recruitment partners and Procurement team as well as Landlords and Contractors to communicate the new rates when they are announced in Q4 and follow up to ensure that they have been implemented the following May.

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.

# Due diligence / assessing and managing risk

We conduct 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 has been a signatory of the [Prompt Payment Code](#) 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. In 2025, on average Capgemini UK took 16 days to pay invoices with 91% being paid within 30 days.
- The previous complete years spend of Capgemini 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 that none of our active suppliers to the UK business are in the top twenty countries with the highest prevalence of slavery.

We acknowledge that modern slavery risk permeates every part of our supply chain. To mitigate this risk, we require our suppliers to integrate our contractual requirements into their own supply chains.

All suppliers to the UK business are fully assessed as part of their onboarding and selection process.

We recognise that the nature of our business means that some purchases such as hardware, 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 are taking preventative actions and evidential enquiries where required.

In line with our Supplier Standards of Conduct we expect our suppliers to uphold and promote human rights in alignment with the International Bill of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work with its core Conventions, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises in dealing with their stakeholders at large (i.e. employees, clients, suppliers, shareholders, and the local communities where they operate).

All suppliers with a specific spend threshold must accept and adhere to our Supplier Standards of Conduct, which includes the stipulation that the standards be flowed down through their supply chain.

All suppliers to Capgemini must complete our on-line assessment as part of the selection and onboarding process. The bespoke tool assesses the full breadth of Corporate Responsibility & Sustainability (CR&S) and 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.

“Corporate risks are identified and managed by Capgemini UK on an ongoing basis. The risk of “Insider Threat” remains one of our top Corporate risks in terms of impact and likelihood. The UK has an established Personnel Security Vetting capability that is DISA (Defence Industry Security Association) certified and that is responsible for the vetting of Capgemini employees and contractors. The capability is positioned within the UK’s Corporate Risk Management framework and plays an important role in identifying potential victims of modern-day slavery through pre-employment and verification checks, as well as in terms of ensuring that we have effective policies and processes in place to maintain appropriate monitoring throughout the employee lifecycle. Pre-employment checks include Right to Work, criminal record, banking details and identity verification, all of which are key to ensuring that, as an organisation, we remain vigilant in combatting the scourge of Modern Slavery.”

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**Colin Smith,**

Capgemini Director UK Corporate Risk

The data from our on-line assessment system indicates that in 2025, 96% of suppliers were found to meet our sustainability criteria. 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 as outlined in the SSC. These suppliers are given two further opportunities to address these gaps, via self-education resources outlining their ethical and business obligations and its importance to Capgemini and a follow-up survey to assess whether their level of engagement and understanding has improved. If on both counts, within a reasonable timeframe, the supplier has either not responded or not acted, then their non-acceptance and associated risks are escalated internally, in order to connect with the supplier to discuss further.

Desktop audits are also undertaken annually on all our UK suppliers to confirm their responses within the assessment. There are 16 questions linked to modern slavery as well as human rights. The top-level question asked is "Are you aware of the Modern Slavery Act?" "Do you have business policies that include the 2015 UK Modern Slavery Act requirements?" "Are your Modern Slavery Act policies flowed down to your suppliers and their suppliers?", 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.

For more than 19 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.

Debt bondage, also known as debt slavery, bonded labour, or peonage, is the most common form of slavery. 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 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 to the above, 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.

In compliance with UK law, Capgemini conducts pre-employment 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.

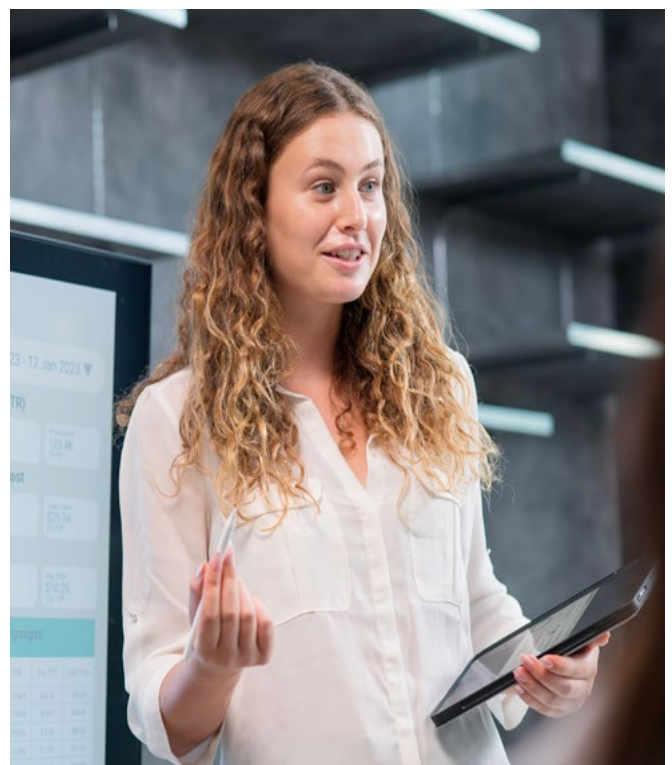
Every year Capgemini completes the Achilles UVDB (Utilities Vendor Database Service) Audit category B2 for companies providing services into the utilities sector. This is an independent audit which assesses all aspects of our management systems and includes questions relating to Corporate Social Responsibility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

Capgemini participates annually in the Cabinet Office Modern Slavery Assessment Tool (MSAT) and continues to achieve a green rating (score 93%, September 2025).

**“Despite more than a decade of engagement with new suppliers, we occasionally still encounter limited awareness of the UK Modern Slavery Act 2015. Encouragingly, understanding of modern slavery and human trafficking risks has strengthened significantly over time. We are committed to continuous improvement and are proud to play an active role in raising awareness, strengthening due diligence, and reducing the risk of modern slavery within our supply chain.”**

**Graham Rooke,**

Sustainable Procurement Team



# Communications and Training strategy

Capgemini's communications strategy focuses on two key areas:

## 1. Raising awareness within Capgemini

To raise awareness within Capgemini of modern slavery, we are utilising three key channels:

### a) Internal Communications

In 2025, through Daily (Capgemini's internal communications tool), we communicated the launch of the 2024 Transparency Statement and [the 2025 UK Modern Slavery Act Policy](#), and marked Anti-slavery day by reminding our people of the importance of fighting modern slavery. Additionally, we promoted our continuing partnership with Unseen.

We held several working group sessions, where we brought in speakers from Scotland Against Modern Slavery (SAMS) and discussed the revised mandated Modern Slavery e-Learning.

### b) Training and awareness sessions

In 2021 Capgemini 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 are taking; and
- Be able to act via highlighted support channels, if necessary, to safeguard others

Employees are expected to achieve a minimum of 80% in the post-training test. Those who fail to achieve the minimum required pass mark, must complete the training again and achieve the required 80% pass mark. 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 31 March 2026, the completion rate for this training was 98%.

In 2025, as part of our partnership with Unseen UK, the training was reviewed to ensure continued relevance. Following this, in July 2026 we will launch an updated course for all new UK employees, alongside a refresher programme for existing employees who completed the mandatory training two or more years ago. All UK employees will be required to complete the refresher training every 2 years

We delivered Modern slavery bespoke awareness training to key teams in the organisation, including Human Resources, Capgemini Works council, Recruitment and Security Vetting. We maintain a dedicated email address for employees to raise questions, concerns, ideas, or share experiences related to modern slavery. The inbox—[modernslavery.enquiries.uk@capgemini.com](mailto:modernslavery.enquiries.uk@capgemini.com)—is monitored daily by the **UK Modern Slavery Lead, Jayna Hathi**.

For the past seven 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 Plc is listed on the associated [CIPS Corporate Code of Ethics](#) register, and our UK procurement team continues to ensure that Capgemini UK Plc maintains the CIPS "Ethical Mark" accreditation.

### c) UK Corporate Capgemini Risk log

In 2025, we formally incorporated our existing modern slavery risks into the UK Corporate Capgemini Risk log. The log is reviewed quarterly by the UK Country Board and managed by the Risk Governance board. The owners of each risk category meet quarterly to review and update the log.

In 2026, we will be moving towards an automated system for tracking, monitoring and maintenance of existing and emerging risks.



**CIPS CORPORATE  
ETHICS**

1231 / VALID TO  
07.10.2026

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

## 2. Building our external network

For several years, we have been members of a range of modern slavery organisations, including Scotland Against Modern Slavery (SAMS), Anti-Slavery Wales, and the Business Services Association (BSA) Modern Slavery Council. These memberships provide Capgemini with insight into legislative developments and opportunities to contribute to improvement areas. They also enable us to strengthen our external network by connecting with organisations, sitting across multiple sectors, facing similar challenges and fostering mutual support.

In early 2026, we renewed our membership with Unseen UK for a third year. With their support, we carried out a detailed gap analysis of our Transparency Statement against BS 25700 and government guidance on transparency in supply chains, using the findings to inform our FY2025 statement.

### a) Building a social presence

In 2025, we recognised the need to strengthen our social presence through external events and platforms like LinkedIn. We are exploring ways to better connect the UK Modern Slavery Lead with emerging messaging, positioning them as a visible ambassador for the cause.

**“In 2024, Capgemini became the first business within the technology sector to join Unseen’s Business Hub, demonstrating their proactive approach to tackling modern slavery. Over the past 12 months, Unseen have worked closely with Capgemini to strengthen their modern slavery approach, including through a full review of their mandatory modern slavery e-learning, helping to raise awareness of modern slavery across the organisation. We are delighted to be continuing this partnership into a third year, and look forward to supporting Capgemini in benchmarking their current approach against the TISC statutory guidance and developing an action plan to support continuous improvement.”**

**Holly Kirk,**  
Lead Business Consultant



# Key performance indicators

Some of the KPI targets developed below, have been updated since the 2024 statement and are intended to give transparency to our aspirations, actions, and performance.

| KPI  | Progress against KPI 2024   | Progress against KPI 2025  |
|--|---|--|
| <b>100% Compliance with Capgemini UK Plc’s standards in relation to modern slavery for all active suppliers to the UK business</b>     | 98% - we no longer work with the remaining 2% as their contracts have naturally ended (measured via our procurement assessment tool)  | We have a 96% compliance rate (measured via our procurement assessment tool)   |
| <b>All new employees are required to undertake the bespoke modern slavery mandatory training – targeting a completion rate of 100%</b> | For all new joiners to Capgemini in 2024, the completion rate was 97%. Completion rate is monitored monthly. Employees must undertake a test and achieve at least 80% before passing the course to demonstrate learning and understanding | For all new joiners to Capgemini in 2025, the completion rate was 99%. Completion rate is monitored monthly. Employees must undertake a test and achieve at least 80% before passing the course to demonstrate learning and understanding      |
| <b>Annual mapping of supply chain spend and risk for modern slavery</b>  | Overall spend in Capgemini UK increased in 2024. There were, however, substantial reductions in the IT & Telco and Travel categories.   | Following a review of 2025 spend and risk, there has been a small increase in spend (7%). There have, however, been no significant changes in categories or geographies of suppliers. Therefore, there are no new changes to the risk profile. |



# 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 business.

Below, we share an update on the improvements captured in our 2024 Modern Slavery Statement and form the basis of our areas for improvement in 2026:

| Improvement  | Status   |
|--|--|
| <b>Investigating the potential for specialised and focused training for contractors working within our business</b>  | This proves to be a challenging area due to the nature of the stakeholders involved. However, we will continue to try and find a way forward.  |
| <b>Completing a gap analysis against BS 25700* and if necessary, create an associated action plan</b>  | Gap analysis completed and the output has been used to guide the FY 2025 Transparency Statement.   |
| <b>Reviewing our internal mandatory computer-based training to ensure it remains relevant and up to date</b>   | Detailed review of the existing training was completed in 2025. A new updated version of the training will be launched in July 2026.   |
| <b>Launch a Modern Slavery training Refresher program in 2026 for all UK employees</b>   | The refresher program will ensure all existing employees who have completed the current mandated modern slavery training revisit their learning, every 2 years. The program will be launched in July 2026. |
| <b>To create, develop and implement client specific Modern Slavery awareness training for non-UK Capgemini employees, working on Capgemini UK Plc Accounts</b> | Delivered training to non-UK employees working on a UK client Account. Non-UK employees are required to complete the mandated eLearning.   |

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

In Q3, 2026, Unseen UK will be helping us with running a Transparency in supply chains (TISC) Readiness Workshop with all key stakeholders. This workshop will help Capgemini assess current performance against the UK Government’s Transparency in Supply Chains guidance and prepare an action plan for setting priorities, identifying barriers, assigning ownership, and creating an actionable multi-year roadmap for modern slavery.

In addition to the above, Capgemini will continue to attend the Unseen Procurement and Retail Hubs.



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.



This Transparency Statement was approved by the Board of Directors for Capgemini UK plc on 26th June 2026



**Julie Mangan**

Company Secretary,  
julie.mangan@capgemini.com



**Colin Smith,**

Capgemini UK Plc Modern Slavery Lead,  
colin.d.smith@capgemini.com

## About Capgemini

Capgemini is an AI-powered global business and technology transformation partner, delivering tangible business value. We imagine the future of organizations and make it real with AI, technology and people. With our strong heritage of nearly 60 years, we are a responsible and diverse group of over 420,000 team members in more than 50 countries. We deliver end-to-end services and solutions with our deep industry expertise and strong partner ecosystem, leveraging our capabilities across strategy, technology, design, engineering and business operations. The Group reported 2025 global revenues of €22.5 billion.

**Make it real. | [www.capgemini.com](http://www.capgemini.com)**

