

THE TRANSPARENCY ACT

(Åpenhetsloven)



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THE TRANSPARENCY ACT

Background

Several global supply chains are complex as they have many joints in different countries. As a result, companies do not have control over all the countries and organizations their products have been through or the consequences their business, suppliers, or business relations have on human rights and working conditions.

The lack of transparency makes it difficult for consumers, organizations, investors, the government, and other stakeholders to know about these conditions and how to use their power to improve human rights and working conditions ¹.

About the Act

The Norwegian Transparency Act came into force on the 1st of July 2022 and followed a broader trend by legislatures across the EU to promote social sustainability. The law has two primary purposes:



Transparency

Ensure public information on how companies are working to reduce adverse impact on human rights and decent working conditions.



Act

Promote companies' respect for basic human rights and decent working conditions in own operation and supply chains.

Companies within the scope of the law have a duty to perform due diligence on human rights and decent working conditions. The companies are obligated to implement actions to either make up or reduce adverse impacts on human rights and decent working conditions. The Norwegian Consumer Authority is responsible for overseeing the Act's Implementation.



OUR COMMITMENT

Capgemini Norway

To ensure that Capgemini Norway does not contribute to or cause adverse impacts on human rights and decent working conditions, we are strengthening our management system for human rights according to the OECD's guidelines for responsible business conduct. We have a dedicated team working on implementing a continuous and dynamic process to help us better understand, manage, mitigate and influence adverse impacts.

Human Rights Due Diligence

Capgemini is committed to preserving human rights. As we are a part of a global company, we have a global supply chain with joints in several countries. Therefore, the influence we have on these joints can be limited. We are now working to strengthen our impact on the supply chains through our due diligence process which is described below:

Five steps:

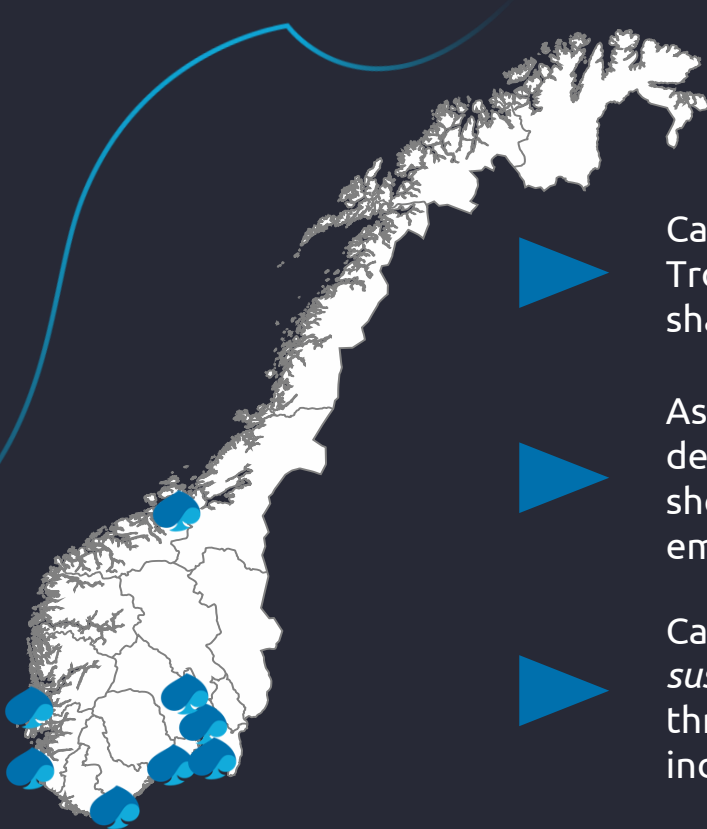


1. Embed responsible business conduct in guidelines, management systems and policies
2. Identify and assess adverse impact in own operation, supply chain and business relations
3. Impact, stop or reduce adverse impacts
4. Monitor implementations and results
5. Communicate how the adverse impact is addressed
6. Provide or cooperate in remediation when appropriate



HOW WE ARE ORGANIZED

Capgemini Norway AS is a leading consulting, technology, and outsourcing supplier. The company mainly services the Norwegian market within the sectors of Energy & Utilities, Public, Financial Services & Insurance, Consumer Products, Distribution, Retail, and Telecom. Capgemini assists clients with transformation, digitalization, and business change. Our relationship with clients is based on collaboration and partnership - we use our experience, best practices, and tools and apply these to our client's unique requirements and needs.



▶ Capgemini Norway AS is located in Oslo (main office), Bergen, Stavanger, Fredrikstad, Trondheim, Lillehammer, Sandefjord, and Kristiansand. The company owns 100% of the shares of Matiq AS, which accounts as a part of its operation.

▶ As of 31.10.2022, the Norwegian company has 1618 employees. The company has a decentralized organizational structure with a low degree of bureaucracy, resulting in short decision-making processes and a high degree of trust and autonomy among employees.

▶ Capgemini's purpose is to *"unleash human energy through technology for an inclusive and sustainable future."* The culture and business practice have been inspired and guided through the company's seven core values, which all employees respect as collective and individual principles.



GUIDELINES AND POLICIES

Capgemini Norway is committed to protecting and preserving human rights following the [United Nations Universal Declaration of Human Rights](#), the [UN Guiding Principles on Business and Human Rights](#), and the International Labour Organization's Declaration Principles at Work ([ILO Declaration](#)). We aim to deliver our solutions while maintaining our high ethical standards. As such, we demand all suppliers to fulfill the criteria reflected in our Suppliers Standard of Conduct except one-time needs below 5K €.

To address any violations or risk of violations of human rights and decent working conditions, we have a global helpline [SpeakUp](#) for all our employees, suppliers, business relations, and clients. The helpline is accessible 24/7 and allow anonymous inquiries.

▶ Following the work with the Transparency Act, we are currently working to anchor newly developed guidelines and policies with the governance group in Norway, in addition to filling the gaps in our current policies. Information about the due diligence process and results will be published in our [UN Global Compact CoP](#) before 01.07.2023.

Guidelines and policies in own operation

- ✓ We have signed up to the UN Global Compact
- ✓ We respect the principles of the Universal Declaration of Human Rights and the International Labour Organization's fundamental conventions on labour standards
- ✓ We support the UN Global Compact Millennium Goals

Guidelines and policies in place

[Supplier Standard of Conduct](#)

[Code of Business Ethics](#)

[ESG Policy](#)

[Human Rights Policy](#)

[Code of Ethics for AI](#)



INFORMATION REQUESTS

If you have any inquiries related to the Transparency Act, please contact us by emailing the following address:
nordicslegal.global@capgemini.com

In order to allow us to address your request, please provide us with the following information:

- Your full name
- Country / Region*
- The nature of your request*

*Without this information, Capgemini will not be able to address your request



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 over 325,000 team members 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, fueled 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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