



SpeakUp schedule

Country specific rules for
Poland



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Objective

This schedule constitutes the Polish schedule to the SpeakUp Policy and forms an integral part thereof. The SpeakUp Policy will at all times remain the leading parent document.

The purpose of this schedule is to draw your attention to the possibility of submitting reports of violations of the law through external reporting channels in Poland, besides the possibility of doing so through the SpeakUp Policy according to the rules set out in that Policy.

Scope

Reports concerning labour law, will not be recognised under SpeakUp Policy. However, they can be submitted via the same reporting channel and will be recognised based on other Capgemini procedures.

Reporting anonymously

Preference will be given to alerts where the identity of the whistleblower can be established. Anonymous alerts are more difficult to identify effectively and as a result, the CapGemini reserves the right not to consider them in principle.

External reporting channel

As indicated in article 3.1 of the SpeakUp Policy, if you feel that you cannot submit your concerns via the SpeakUp and reasonably believe the information you wish to report is true, you may consider submit your concerns to a competent external authority, without any prior internal report. External reporting is possible with polish investigating authorities, for example the Ombudsman.

Confidentiality

The company's internal reporting processes are secure and confidential, which means that no unauthorised person has access to information stored therein.

The identity of the whistleblower, together with any other information from which his/her identity may be directly or indirectly inferred, will be treated as confidential and protected and will not be disclosed, without his/her consent, to anyone other than authorised persons within the company or their designees who are authorised to receive the report or to take follow-up action.

Exceptionally, and subject to appropriate safeguards in accordance with applicable European Union and national legislation, the identity of the whistleblower and any other information from which his/her identity may be inferred may be disclosed, where disclosure is a necessary and proportionate legal obligation in connection with investigations carried out by public authorities or preparatory proceedings or investigations conducted by courts, including for the purpose of guaranteeing the rights of defence of the person affected by the report.



Retention periods

The personal data contained in the reports and in the report registry are processed in accordance with data protection legislation, in particular the GDPR and the Polish Act on the Protection of Whistleblowers.

Personal data that is not relevant to the processing of the report will not be collected and, if accidentally collected, will be deleted immediately. The deletion of such personal data takes place within 14 days of the determination that it is not relevant to the case.

Personal data and other information in the report registry are retained for a period of three years after the end of the calendar year in which the follow-up actions were completed, or after the completion of the proceedings initiated by these actions.



Contact

Capgemini Polska Sp. z o.o.
Hanna Kidziak, Ethics and Compliance Officer, Poland

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