



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 Capgemini UK plc has taken to detect and prevent slavery and human trafficking in its organisation and supply chain.

The report has been fully reviewed and updated and constitutes Capgemini UK plc's transparency statement for financial year 2022

**Links incorporated within this transparency statement will be checked on a quarterly basis, and updated, if necessary, to ensure they are still correct*

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“ SAMS are delighted that Capgemini joined our movement and is leading their sector in working proactively to eradicate this human misery from society. ”

Shan Saba,
Founder, SAMS (Scotland Against Modern Slavery)

Introduction

“ I have been in post for just over a year, and in that time I have seen increased awareness not just internally, but also externally by the questions being asked by our current and prospective clients. Our collaboration with Scotland Against Modern Slavery is providing invaluable insight into the continuing challenges individuals and companies face. Unfortunately, it is an increasing issue across the globe so complacency is not an option. ”

Maria Hughes,
UK Modern Slavery Lead

The Capgemini Group has a zero-tolerance approach to bribery, corruption, and human rights abuses. Training and awareness have been a key area of focus thereby ensuring both our employees and supply chain is fully alert to the scale of the issue, the Modern Slavery Act 2015 and as modern slavery is not just a 9-5 issue, how to spot instances of modern slavery and how to report it.

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, insofar as is possible, ensure that modern slavery and human trafficking is not taking place in any part of our supply chains or in our own business.

In 2022, we progressed our approach and supported the identification and education of modern slavery, by:

- Finalising the structure of our UK Modern Slavery Working Group, our new dedicated group focused on embedding best practices across our business. Representatives from key business areas have been selected to join the group, as we continue to grow and evolve our anti-slavery programme
- Running additional internal awareness sessions to provide tailored modern slavery screening guidance to key business areas. This is in addition to our mandatory modern slavery e-training for all available UK employees
- Updating our global hotel vendor selection process by incorporating new modern slavery screening questions
- Implementing an automated Right to Work check utilising biometric face match technology thereby strengthening our personnel verification process
- Establishing our dedicated internal Social Value Hub, which supports the development of commitments across the five themes of the governments Social Value Model. This incorporates a focus on identifying and managing the risks of modern slavery
- Signing up as a corporate partner with [Scotland Against Modern Slavery \(SAMS\)](#) – providing us with invaluable insights into the latest best practices through monthly roundtable meetings
- Donating to four charities working to support wider action to eradicate modern slavery within the UK and internationally. Capgemini UK's Country Board has approved a further charitable donation to be made to anti-slavery charities in 2023
- Helping upskill staff and clients of a slavery-prevention charity by providing training on staying safe online through our relationship with Business in the Community

Capgemini's [seven values](#) inspire our ethical culture, with people at the heart. In early 2023 for the 11th year running, Capgemini has been named as one of the [World's Most Ethical Companies by the Ethisphere Institute](#).

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.

About Capgemini's business and supply chains

“As a trusted business partner to our clients and with 360,000 team members operating in over 50 countries, we aim to be an ethical leader and role model,” comments Jerome Simeon, Group Head of Ethics and Global Industries, Group Executive Board Member at Capgemini. “This World’s Most Ethical Company recognition, for the 11th year in a row, honors our team’s collective efforts to live our values by making ethical business choices every day – each one contributing to our ethical culture, helping to create the future we all want.”

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’ opportunities in the evolving world of 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 360,000 team members in over fifty countries.

The Board of Directors sets the strategic direction of the Company and the Capgemini Group. It appoints the executive corporate officer(s) responsible for implementing this strategy, approves the financial statements, convenes the Shareholders’ Meeting, and proposes the annual dividend. 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.

The UK Business Unit is comprised of Market Units and Local Practices:

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

Local Practices comprise Application Management Services, Business & Technology Solutions, Cloud and Custom Applications, Digital Customer Experience, Packaged Based Solutions, ERP Cloud, SAP.

We are part of a global network of Capgemini entities in the Capgemini Group. From time to time, we subcontract elements of our client engagements or operations to other Group companies, for example when providing services under our Rightshore model. Our Group companies are therefore part of our supply chain. In our risk assessment and due diligence activities we have distinguished between members of the Capgemini Group in our supply chain and third-party suppliers. This is because of each Group company to whom we may sub-contract will adhere to our Group policies and governance processes. They are founded on and practice the same values and ethics, and we share a commitment that ethics and integrity are fundamental and uncompromising elements of the way we conduct our business.

The nature of our business means that our sourcing activities, in the majority of cases, tends to be with suppliers that are trading from the UK or low risk countries. **All suppliers 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’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 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.

We also have an established employee representation body **Capgemini’s 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.

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 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.

“ At Capgemini, seven Values inspire our ethical culture. Our central team, supported by a global network of ethics officers, works continuously to strengthen and refine our framework and approach, in order to foster ethical questioning, reasoning and actions. In this way, each of our employees contributes to our ethical culture. We seek to extend the benefits of this culture to all our stakeholders and the wider community. Our Group Human Rights Policy formalizes our longstanding commitment to honor human rights within our Group, and across our ecosystem. We are proud to have been recognized – for eleven consecutive years – as one of the World’s Most Ethical Companies™. ”

Anne-Violaine Monnié-Agazzi,
Group Ethics Officer

Organisational policies

At Capgemini UK, we pride ourselves on having an inclusive culture where everyone is treated with respect and dignity, and this is promoted regularly 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 employee survey, that we run monthly, tells us how important this is to our colleagues and that their experiences are very positive.

All policies that are published as part of our business are approved and signed off by UK leadership.

Our [Supplier Standards of Conduct](#) sets the minimum commitment Capgemini expects from its suppliers. The standards of conduct contain our principles with regards 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.

In 2021 Capgemini Group launched our [Human Rights Policy](#), endorsed by our Global CEO Aiman Ezzat, it summarises our commitment, our program and our governance to continue to protect and uphold human rights.

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](#) formalizes and explains our Values and principles of action.

Our “[SpeakUp](#)” policy details our ethics helpline and is a natural extension of our values-based culture and high ethical standards. It is a web and phone-based ethics reporting, incident management and advisory tool, hosted by an independent service provider and managed by Group Ethics and supported by our global network of Ethics & Compliance Officers and Human Resources (HR) investigators. SpeakUp is voluntary, confidential, and allows anonymity, unless stated differently by a country’s local law which is detailed within the policy. It is made available by Capgemini to our **team members, customers, suppliers and business partners**. SpeakUp is a commitment from Capgemini to listen to voices when 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 report alerts and/or ask for advice and guidance about actions or behaviours that are not aligned with our Values; not in compliance with applicable laws, or that may significantly affect vital interests of Capgemini and its affiliates.

“ Ethics matters. Organisations that commit to business integrity through robust programs and practices not only elevate standards and expectations for all, but also have better long-term performance,” said **Ethisphere CEO, Erica Salmon Byrne**. “We continue to be inspired by the World’s Most Ethical Companies honorees and their dedication to making real impact for their stakeholders and displaying exemplary values-based leadership. Congratulations to Capgemini for earning a place, once again for the 11th year running, in the World’s Most Ethical Companies community. ”

Anyone who raises or helps to address an alert on SpeakUp in good faith is protected by our non-retaliation policy. Substantiated alerts result in appropriate remediation actions including disciplinary action or process improvement.

Building on our commitment to foster a positive and inclusive workplace, our internal “**Respectfully Us**” programme, launched in 2019, drives a programme of activity that encourages all of us to stand up to inappropriate behaviour in all its guises by ‘breaking the silence’. We have trained independent inclusion & Respect Ambassadors across the UK business. Employees can approach the Ambassadors informally, as trusted advisors, with any concerns to look at ways to resolve inappropriate behaviour in a respectful and open way.

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 is also shared by our Workplace Services providers who have signed up to contractual obligations to pay the Living Wage to all Capgemini UK employees.



“ Every supplier to Capgemini UK is required to respond to the modern slavery specific questions that are part of our Supplier Risk Assessment system irrespective of their need to comply with the Modern Slavery Act 2015 to publish a statement. We ask about their activities relating to detection and prevention of modern slavery within their business and supply chains and it is reassuring from the responses we have received over the last 6 years, that knowledge of the act and the importance of modern slavery awareness has increased. ”

Graham Rooke,
Procurement Excellence

Due Diligence / Assessing and Managing Risk

We conduct annual due diligence on all procurement policies to identify any area where Capgemini could be unintentionally putting pressure on our suppliers in a way which may lead to modern slavery risks. Capgemini UK has been a signatory of the [Prompt Payment Code](#) since 2013.

This exercise provides our procurement professionals including buyers, commodity managers and category directors with the tools to deliver Capgemini's policies.

Annual due diligence is also undertaken on Capgemini UK's annual spend to determine how any change in our spend profile affects the risk of modern slavery within our supply chain. We have no active suppliers in our assessment system that are from the top ten countries with the highest prevalence of slavery, according to the Global Slavery Index (2018). Only 0.3% (2) of our suppliers are based in a country that is not recognised by the Global Slavery Index as having a strong response to Modern Slavery. One supplier, after being contacted by the team, is compliant and the other supplier is taking steps to improve. We recognise that the nature of our business means that we have some purchases that have a higher risk because of what they are, where they are made or both. In all these cases we are taking preventative actions and making evidential enquiries at every stage of the procurement process.

Since 2010 all active suppliers to our UK business have a contractual obligation to complete our [on-line assessment](#). From 2016 the bespoke tool assesses the full breadth of Corporate Responsibility & Sustainability (CR&S) activities as well as the corporate compliance of our suppliers. It includes questions, requiring evidence, about their modern slavery policies, actions and intended future activity. Our dedicated sustainability compliance team manage all the risk assessments and for those suppliers that do not give answers that meet our expectations, they are re-contacted, and resources provided for them to self-educate, to understand and consider their ethical and business obligations. The importance to Capgemini, and our clients, of taking a vigilant stance against slavery is communicated and how we expect our tier 1 suppliers, and all subsequent tiers, to be aligned with our ethical standards, and provide resources for them to self-educate, to understand and consider their ethical and business obligations.

Capgemini UK has assessed its entire supplier base against [our Core Principles of Sustainable Procurement](#) via our custom-made, on-line assessment tool. More than 91% of suppliers were found to meet our sustainability criteria, and we no longer conduct business with the remaining 9%. Looking at our modern slavery standards specifically, 96% of our suppliers comply and we are working with the other 4% to provide education and awareness.

“ Recruitment has a big role to play in the effort to identifying potential victims and raising awareness within our organisation and in our supply chain. By conducting due diligence on our suppliers and external agencies we ensure they share our commitment to combatting modern slavery and prioritise those who align with our values and actively promote ethical recruitment practices. By undertaking pre-employment checks we remain vigilant and aware of the risks of modern-day slavery. ”

Claire Hamilton,
UK Talent Acquisition
Director



For more than 18 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. All suppliers must accept and adhere to our [Supplier Standards of Conduct](#), which includes the stipulation that the standards be flowed down through their supply chain.

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 for a debt or other obligation, where the terms of the of the repayment are not clearly or reasonably stated and the person who is holding the debt has some control over the labourer. These debts are often paid via recruitment fees and Capgemini Group has 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.

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 as stipulated within our Supplier Standards of Conduct.

In addition, Capgemini UK has also applied measures as part of our payroll process with regards to the detection and prevention of debt bondage amongst our employees. This is also tracked via a KPI.

In compliance with UK law, our recruitment teams conduct **Right to Work** checks on all new joiners. Prior to the coronavirus (COVID-19) pandemic, these checks were undertaken in-person but were moved to video conferencing during the pandemic. In November 2022, we onboarded a digital identity verification provider to verify individuals with a UK passport, using face-match technology. Individuals without a passport are verified in person. As part of the checks, identification documentation is shared. 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 the [Cabinet Office Modern Slavery Assessment Tool \(MSAT\)](#) and continue to achieve a green rating.

We have a robust response in our policies and processes, which includes board level support, to ensure that we are vigilant, committed to preventing and detecting any potential incidences; we have a zero tolerance of slavery.

Key Performance indicators

The KPI targets developed below were 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.

KPI	2021	2022
Inform Capgemini UK's Country Board about how the KPIs have been met	Country Board receive direct updates regarding progress against KPIs	Country Board receive direct updates regarding progress against KPIs
100% Compliance with Capgemini's standards in relation to modern slavery for all active UK suppliers	91% of reviewed and newly assessed suppliers comply – we are working with the remaining 9% with education and awareness	96% of reviewed and newly assessed suppliers comply – we are working with the remaining 4% with education and awareness
100% of suppliers assessed via Capgemini UK's supplier profile risk assessment tool	100% of suppliers are fully assessed	100% of our suppliers are fully assessed
Transparency statement published on Capgemini UK's external website within six months of the company's year-end, i.e. by 30th June	The 2020 transparency statement was published on 1 st June 2021	2021 transparency statement was published on 30 th June 2022
Annual mapping of supply chain spend and risk for modern slavery	The spend profile has not changed significantly either in geography or commodities as a result of acquisitions. The annual spend has increased since the last exercise.	Following review of 2022 spend and risk, the spend profile has not changed significantly either in geography or commodities. The annual spend has also not significantly increased since the last exercise
Conduct annual due diligence on procurement policies, processes, and practices	Annual due diligence undertaken to ensure no unnecessary pressures are placed on suppliers, especially around payments. Capgemini UK has been a signatory of the Prompt Payment Code since 2013.	Due diligence completed ensuring no undue pressures are placed on suppliers, especially around payments
All available Capgemini UK employees are required to undertake the bespoke modern slavery mandatory training	Training launched in June 2021, as at the beginning of January 2022 the completion rate was 78%. The percentage completion is monitored monthly to ensure an upward trajectory.	Training completion rate for available employees was 91% at the beginning of January 2023. Monthly reporting is provided to monitor completion. Work is ongoing to reduce 9% non-completion
Debt bondage detection measures conducted on each pay run	This continues to be undertaken monthly. To date no issues have been identified.	Undertaken monthly, with no issues identified
Provide outcomes and action plans from annual due diligence	Following due diligence, no changes were required and there are no outstanding actions	Following due diligence, no changes were required and there are no outstanding actions
To identify opportunities and develop action plans for continuous improvement	Liaising with parties both internally and externally to feed into our continual improvement strategy	Driving continued improvements to the programme is a key activity of our newly launched UK Modern Slavery Working Group. Improvements are captured below
Introduce modern slavery awareness to all new employees as part of Capgemini UK's induction programme	Modern slavery and the requirement to complete the mandatory training continues to feature as part of the new employee recruitment process	The modern slavery mandatory training continues to be allocated to all new employees as part of their onboarding and completion reports are provided to the UK Modern Slavery Lead monthly
Our UK procurement professionals shall ensure Capgemini maintains the CIPS "Ethical Mark" accreditation	Our UK Procurement team continue to be CIPS accredited	UK Procurement team continue to be CIPS accredited

Note: KPIs and Commitments have been merged within this statement

“ We recognise that slavery and human trafficking is a real yet hidden issue in our society. At Capgemini, we will not tolerate slavery and human trafficking in our business or supply chain. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that any form of slavery is not taking place in our own business or supply chains. Acting ethically is at the heart of our business and so Capgemini are proud to have been recognised as one of the World’s Most Ethical Companies for the last 11 years. ”

Carolyn Miller
UK HR Director



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

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 links out to an [external survey](#), which will inform you of the slaves potentially working for you based on your lifestyle. 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 at the beginning of 2023, the completion rate for this training was 91%.

In addition, since 2017 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 modernslavery.enquiries.uk@capgemini.com is monitored daily by the Capgemini UK Modern Slavery Lead, Maria Hughes. A key part of Maria’s role is to ensure a high level of continual awareness across Capgemini UK, for example by delivering customised awareness training to key areas of the business during 2022.

Our UK Procurement team successfully undertook the Chartered Institute of Procurement and Supply (CIPS) ethical training module for the fourth year running. 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 [CIPS Corporate Code of Ethics](#) register.

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

Continual improvement

As part of the UK government’s associated guidance for business it is expected that year-on-year improvements are made. These should 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 2022 Modern Statement:

Improvement	Status
Support modern slavery charities through volunteering opportunities	Several charities were supported during 2022, through donations and by providing “Staying Safe Online” awareness training. This will continue into 2023
Build a network/working group/forum internally (UK and Group) and externally with other interested parties	UK Modern Slavery Working Group terms of reference developed, and representatives identified across the business. The Working Group was officially launched in January 2023 and will meet quarterly The UK Modern Slavery Lead regularly liaises with representatives across the Capgemini Group with corresponding legislation Signed up as a corporate partner with charity Scotland Against Modern Slavery (SAMS)
Launch Human Rights training for all available Capgemini employees globally	Training linked specifically to our Human Rights Policy launched early 2023

During 2023 we are continuing to improve our anti-slavery program by:

1. Investigating the potential for specialised and focused training for contractors working within our business
2. Completing a gap analysis against BS 25700 and if necessary, create an associated action plan
3. Reviewing our internal mandatory computer-based training to ensure it remains relevant and up to date
4. Undertaking review and mapping of 2023 spend against updated Global Slavery Index (2023)



This Transparency Statement was approved by the Board of Directors for Capgemini UK plc on 29th June 2023



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Capgemini UK Modern Slavery Lead,
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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 360,000 team members in 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 2022 global revenues of €22 billion.

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