

Group Anti-Corruption Policy

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THE COMMITMENT OF OUR CEO



Dear colleagues,

Since its foundation in 1967, the success of our Group has been based on our core values, including honesty and trust. This leads us to continue to reinforce our culture of compliance, ethics and integrity, both within the organization and with third parties.

Corruption in any form is contrary to the Group's values. However, expressing zero tolerance for corruption is not enough. We need to ensure that every Group company employee, wherever he or she is, can identify and avoid situations that could violate anti-corruption laws. We maintain a zero-tolerance policy for any form of corruption. Our commitment is backed by the potential application of disciplinary measures in addition to any sanctions applicable by law.

Corruption in any form benefits a few people who abuse their power or position. It undermines democratic institutions, creates unfair competition, slows down economic development, damages innovation and is illegal in most countries.

Hence the need for this Anti-Corruption Policy. It is written in a simple and practical manner and it informs Group company employees of what they can and cannot do and where to find support.

This edition incorporates the requirements of the French law on transparency, fighting corruption and modernising economic life (known as the Sapin II Law) that applies to the parent company of the Group and all its subsidiaries.

Our employees have to be familiar with and respect the rules contained in this Anti-Corruption Policy and regularly refresh their knowledge in this area. This Policy is not exhaustive – the rules will necessarily evolve to take into account any possible changes in legislation, the evolution of our risk mapping and your feedback.

We are all responsible for ensuring these rules are followed. I count on you and rely on your support in this process of prevention and detection of corruption. Violations of this Anti-Corruption Policy will not be tolerated.

Yours sincerely,

Paul HERMELIN

Chairman and CEO



Introduction: the Purpose of a Policy on Preventing Corruption

The Capgemini Group and all its consolidated subsidiaries must comply with the requirements of French law no. 2016-1691 on transparency, fighting corruption and modernizing economic life (known as the Sapin II Law). The Group must also comply with all other applicable anti-corruption laws, including the US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act 2010. It is important to note that, like the Sapin II Law, which applies to all of the Group's subsidiaries, the FCPA and the UK Bribery Act 2010 have certain extraterritorial reach.

What are the Objectives of this Anti-Corruption Policy?

The first objective is to identify and clarify the different types of corrupt practices and explain what makes them illegal. It is the responsibility of every person working for the Group companies — irrespective of country of origin, place of work, residence, educational or cultural background or position — to understand what corruption is and what risks and legal sanctions it involves.

The second objective of this Policy is to define Group standards on activities, such as promotional expenses and corporate sponsorship that could lead to or be interpreted as corrupt practices. It is crucial for us to collectively defend and protect the ethical values of our Group by defining, implementing and effectively complying with these standards.

The third objective of this Policy is to express our conviction that honesty fosters competitiveness. By letting integrity direct our day-to-day actions — from research to marketing, from daily routine tasks to strategic development — we protect and ensure the long-term sustainability of the Group's growth. In an increasingly competitive world, integrity has become an asset valued by our clients, business-partners, employees and society at large.

By publishing and widely disseminating this Anti-Corruption Policy, we explicitly restate the Group's commitment to excellence in services and operations to our clients, long-term sustainability of our business model to our shareholders, and pride and trust in their working environments to our employees and business-partners.

Compliance with the Anti-Corruption Policy and Sanctions

This Anti-Corruption Policy is distributed to all employees through the Talent Intranet. All employees must read, understand and comply with it. Compliance with this Policy is a condition of employment of all Capgemini employees. The violation of this Policy by any employee, regardless of the Group company or place of activity, may subject you to disciplinary sanctions, up to and including termination of employment. Violating anti-corruption laws can also expose you to civil damages, criminal fines and other penalties, including imprisonment.

In accordance with the provisions of the Sapin II Law, this Anti-Corruption Policy must be considered as an addition to the internal rules (*règlement intérieur*) for Capgemini Group companies in France as well as in any other country where such regulation exists.

Local Anti-Corruption Laws and Guidelines

This Anti-Corruption Policy cannot address all the issues raised by local legal requirements, which may be more restrictive than the Group's standards.

Where appropriate, your Legal Team and General Counsel-Ethics & Compliance Officer will provide additional guidance as to the reach and consequences of these local laws.



A.

PROHIBITED CONDUCT

This section presents the main corrupt practices including influence peddling, extortion, facilitation payments and fraudulent book- and record-keeping.

These requirements apply to all Capgemini employees at any level of the Group. Third parties working for a Group company (consultants, subcontractors, suppliers and others) are also expected to comply with these general principles.

1. WHAT IS CORRUPTION IN GENERAL?

In legal terms, corruption can be broadly defined as: “**offering anything in order to obtain an undue advantage.**”

The offering of “**anything**” can take many forms, from money (whether in the form of cash, wire transfer or otherwise) to benefits in-kind, such as entertainment, travel, upgrade to first class airfares, side trips to holiday resorts, sponsorship and employment of relatives or friends.

The “undue advantage” can take many forms such as a preferential treatment, the conclusion of a contract, the disclosure of confidential information, a customs exemption, or a waiver of penalty following a tax investigation.

It is also important to understand that both offering or giving anything on the one hand in order to obtain an undue advantage, and requesting, accepting or receiving anything on the other in order to confer an undue advantage, are corruption offenses and condemned by law.

Under most countries’ laws, the offense of corruption is established upon merely **promising** an undue



advantage, even if such advantage is not actually conferred. The offense is also established whether the promise or conferring is done **directly or indirectly**, i.e., using a third party as intermediary.

The Group does not tolerate any form of corruption, whether public or private.

2. CORRUPTION OF PUBLIC OFFICIALS

Corruption of public officials may be defined as “the promise, offering or giving, to a **public official**, directly or indirectly, of an undue advantage, for the official himself or herself or another person or entity, in order that the official act or refrain from acting in the exercise of his or her official duties”.

The concept of “public official” is to be understood very widely. It encompasses any person:

- holding a legislative, executive, administrative or judicial position;
- providing a public service and/or performing any public function, including on behalf of a public agency or a state company;
- hired by a private company executing, according to local law, a publicly financed contract or a contract with a publicly owned or publicly controlled organization; or
- who is a candidate for a political office or who is a person having a significant position, with decision-making power, in a political party.

Conferring undue advantages on close relatives of public officials, even if they are not legally assimilated to the notion of a public official, can carry the same sanction as conferring an undue advantage directly on an official himself or herself.

The Group does not tolerate any form of corruption of public officials, whatever the country and the activity concerned.

3. PRIVATE CORRUPTION

When an undue advantage is promised to or conferred on a private-sector individual, as opposed to a public official, it is considered an act of private corruption.

For example, the act for a supplier of promising or conferring an undue advantage in exchange for confidential information during a call for tenders is considered an act of private corruption and is condemned by law.

It is important to understand that both promising or giving anything, on the one hand, and requesting, accepting or receiving something, on the other, are corruption offenses and condemned by law.

The Group does not tolerate any form of private corruption, whatever the country and the activity concerned.



4. INFLUENCE PEDDLING

Influence peddling may be defined as "the promise, offering or giving to a public official or any other person, directly or indirectly, of an undue advantage in order that the public official or the person abuse his or her real or supposed influence with a view to obtaining from an administration or public authority an undue advantage for the original instigator of the act or for any other person".

Influence peddling also includes the solicitation or acceptance by a public official or any other person, directly or indirectly, of an undue advantage for himself or herself or for another person in order that the public official or the person abuse his or her real or supposed influence with a view to obtaining from an administration or public authority an undue advantage.

Influence peddling is a form of corruption.

Some jurisdictions, such as France, Brazil and Spain, legally distinguish the offence of corruption from that of influence peddling. Others, such as the US, don't make this legal distinction.

The Group does not tolerate any form of influence peddling, whichever the country or the activity concerned.

5. EXTORTION

Certain public officials abuse their authority to obtain undue advantages, for example by soliciting an advantage in exchange for waiving fines during operations such as tax investigations. This is called extortion.

Yielding to extortion constitutes a corruption offense in most countries.

The Group prohibits any form of yielding to extortion, whatever the country and the activity concerned.

HOW TO RESIST EXTORTION?

Resisting Extortion and Solicitation in International Transactions (RESIST) is a free tool offering various operational recommendations, based on practical scenarios, on resisting extortion.

The project was developed jointly by the International Chamber of Commerce (ICC), Transparency International, the United Nations Global Compact and the World Economic Forum Partnership Against Corruption Initiative and it can be downloaded at:

<https://iccwbo.org/publication/resisting-extortion-and-solicitation-in-international-transactions-resist/>



6. FACILITATION PAYMENTS

Facilitation payments are small amounts paid to a public official to expedite the execution of a routine administrative action to which the payer is entitled. Unlike bribes, these payments are not intended to obtain an unfair advantage. They are intended to encourage public officials to perform their duties, for example, the issuance of an authorization or a permit.

Facilitation payments are illegal in most countries.

The Group prohibits any facilitation payments, whatever the country and the activity concerned.

7. FRAUDULENT BOOK- AND RECORD-KEEPING

No manipulation or falsification of accounting entries concealing any form of corruption or influence peddling will be tolerated, whatever the country and activity concerned.

The Group accounting standards described in TransFORM must be strictly adhered to.



B. PRACTICAL GUIDANCE TO AVOID RISKY CONDUCT

This section presents the basic principles and procedures that must be followed to ensure compliance with this Policy and protect against any corruption-related liability risks. It goes through **different practices and situations that may be characterized as instances of corruption**. Please remember that this Policy does not claim to cover every business circumstance you may encounter in your daily working life. However, it should provide you with enough information to deal with many of the issues you are likely to be faced with. Remember that you are not alone and that you should use the support that is available to you from your **supervisor**, and your **General Counsel-Ethics & Compliance Officer** for any questions or assistance in this area.

These requirements apply to all Capgemini company employees at any level of the Group. Third parties working for a Group company (consultants, subcontractors, suppliers and others) are also expected to comply with these basic principles and procedures.



1. INVITATIONS, MEALS, GIFTS, TRAVELS AND LODGING

Basic Principles

The payment or reimbursement of expenses such as those incurred for entertainment, meals, gifts, travel and lodging for individuals, including public officials, must meet all the following **basic principles**:

1. It must comply with applicable laws, Group Policies as well as the known internal rules of the recipient's employer;
2. It must occur in connection with a verifiable legitimate business purpose;
3. It must neither be made to gain an undue advantage nor unduly influence an action;
4. It must:
 - i. have a reasonable value,
 - ii. be appropriate considering the recipient's position, the circumstances and the occasion for which it is made,
 - iii. not create a sense of obligation or an appearance of impropriety,
 - iv. not be reasonably understandable by the recipient or others as a bribe, and
 - v. not be given frequently to the same recipient;
5. If intended for public officials, the entertainment (1.1), the gift (1.3) or the travel and lodging (1.4) must be cleared in advance by the General Counsel-Ethics & Compliance Officer, unless it is permitted explicitly under local anti-corruption guidelines;
6. It must be recorded fairly and accurately in the Group company's books and records.

Any divergence relating to a **basic principle** requires written pre-approval from the **General Counsel-Ethics & Compliance Officer**.



WHAT DOES “REASONABLE” MEAN?

What is reasonable or appropriate is not the same in every situation. This must be assessed on a case-by-case basis, taking into account the specific context.

WHAT DOES “NOMINAL VALUE” FOR A GIFT MEAN?

- Gifts of nominal value include small mementos and promotional items, bearing the Group names or trademarks such as mugs, pens or calendars;
- Customary or seasonal gifts of modest value such as flowers, books or fruit baskets.

WHAT IF THE RECIPIENT HAS DECISION-MAKING POWER ON A PENDING DECISION?

Please note that if the recipient has direct or indirect decision-making power on a pending or anticipated decision that could affect the Group’s interests, extra caution should be exercised.

Pending or anticipated decisions that affect the Group’s interests include:

- Calls for tenders;
- Changes in legislation or regulations, grant of a government subsidiary; or
- Commercial contract awards or extension.

If in doubt, you might consider documenting your offer of entertainment, meals, gifts or travel and lodging in writing. Such invitation could include an acknowledgement that, to the best of the Group entity’s knowledge, the offer complies with applicable laws; that the offer is further contingent on it complying with the policies of the recipient’s employer; and that it is the recipient employee’s responsibility to verify this.

Before accepting or offering a gift or invitation, ask yourself:

- Is it of nominal value? Is it reasonable?
- Does it comply with the Group's rules? Does local legislation set out other limits?
- What is the intention behind this gift or invitation? Does the recipient have decision-making power on a decision that would affect the Group’s interests?
- Could you discuss it openly with your colleagues?



1.1. Entertainment

Invitations to entertainment events or marketing events (such as plays, concerts, sports games, conferences, museum visits, seminars or Capgemini events) are legitimate opportunities to build intimacy with clients or suppliers. However, they may also bring the risk of creating an appearance of impropriety.

For this reason, entertainment invitations are allowed if all the following conditions are met:

- The **basic principles** (cf. B 1) are met;
- The following **additional conditions** are met:
 - A Group company employee is present at the event;
 - The catering provided is reasonable and appropriate in the circumstances;
 - The entertainment is legal and socially acceptable; and
 - Additional benefits are of a nominal value (for instance a USB stick).

Any divergence from an **additional condition** should be pre-approved in writing by your **BU manager**, who must copy your **General Counsel-Ethics & Compliance Officer**.

Practical Scenario

You are in charge of a project requiring the use of suppliers. At the time of the call for tenders, one of the potential suppliers invites you to a tennis match at the French Open, Roland Garros. What is the best behavior to adopt in such a situation?

You must decline this invitation. You may end up in a conflict of interest situation that may be considered corruption if the supplier expects undue compensation in exchange, such as confidential technical information. As a reminder, in the context of a call for tenders, all suppliers must have access to the same information.

You must also notify the BU manager in writing of this proposal and discuss with your management to determine the appropriate course of action with respect to that supplier.



1.2. Meals

Doing business over a meal is common practice in the business world. A meal may be offered to a third party without pre-approval, if all of the following conditions are met:

- The **basic principles** (cf. B 1) are met;
- The following **additional conditions** are met:
 - The meal is directly business-related (e.g., it takes place in the course of a meeting or the purpose of the meal is to have business discussions); and
 - The value is that of a standard working meal under local or other applicable standards or as appropriate considering the recipient's position, the circumstances and the occasion. **The Group Travel and Expenses Policy** should be used as a reference.

Any divergence from an **additional condition** should be pre-approved in writing by your **BU manager**, who must copy your **General Counsel-Ethics & Compliance Officer**.

1.3. Gifts

Giving small personal gifts is often part of local custom or culture. A Capgemini company employee is not allowed to request or demand a gift. A non-monetary gift given to (or received from) a third party (e.g., a client or a service provider) or a public official is permitted, if all the following conditions are met:

- The **basic principles** (cf. B 1) are met;
- The following **additional conditions** are met:
 - It is of a nominal value (this might be further specified under local anti-corruption guidelines);
 - It is infrequently given to the same recipient (i.e. no more than once within a six-month period). It is not advisable to provide gifts (even of nominal value) to public officials more than once within a six-month period. In certain countries, such as Germany, gifts to public officials, even of nominal value, are prohibited, whatever the frequency;
 - It is only provided to the business contact and not to the individual's family members or friends; and
 - It is never given in cash or cash equivalent (e.g., gift cards or pre-paid vouchers).

Any divergence from an **additional condition** should be pre-approved in writing by your **BU manager**, who must copy your **General Counsel-Ethics & Compliance Officer**.



Practical Scenario

A supplier offers you a watch with the logo of his/her company. Can you accept it?

If it is a modest-value advertising watch, it can be accepted. However, if it is of significant value, you must refuse the gift and notify your supervisor.

1.4. Travel and Lodging

In certain circumstances, it may be necessary to pay the travel and lodging expenses of third parties, for example, for visiting the Group company premises or attending a Capgemini event. All such invitations must comply with the following conditions:

- The **basic principles** (cf. B 1) are met;
- The following **additional conditions** are met:
 - The invitation does not include or cover the cost of any side trip;
 - The distance of travel and duration of stay are reasonable and appropriate and justified by legitimate business reasons;
 - It complies with the Group Travel and Expenses Policy;
 - Payments to cover travel and lodging expenses on behalf of public officials must be made directly to the vendors (such as the airline companies, the hotels) or to the public official's agency concerned. If direct payment to the vendors or the public official's agency concerned is not possible, then, as for private individuals, reimbursement of expenses must be subject to the provision of legitimate and sufficient supporting and evidencing documentation for the expenses;
 - It is only provided to the business contact and not to the individual's family members or friends; and
 - The expenses are not in excess of what a Group company employee of equivalent status would have spent for traveling to the same destination.

Any divergence from an **additional condition** should be pre-approved in writing by your **BU manager**, who must copy your **General Counsel-Ethics & Compliance Officer**.



2. SPONSORSHIP, POLITICAL CONTRIBUTIONS AND CHARITABLE DONATIONS

2.1. Sponsorship

Group company sponsorship of sports, culture, social, education or business either occasional or recurring events are a part of Capgemini's communication and marketing with customers and other stakeholders. Sponsorship is different from charitable donations, as its purpose is to promote and strengthen the Group brands displayed during the event. Sponsorship is also different from public relations events, which follow the rules relating to entertainment, meals, gift or travel & lodging (see B 1). To ensure that a sponsorship serves its intended business purpose to promote and strengthen the Group brands and does not create an appearance of impropriety, it must be pre-approved in writing by either the SBU Manager, for a sponsorship which does not exceed €15,000 (or its equivalent in local currency) annually, or by Group Corporate Marketing & Communication, for a sponsorship exceeding that amount. A sponsorship will normally be approved, if all the following conditions are met:

- It complies with applicable laws;
- It complies with Group policies;
- It is aligned with Group strategy, the Group's "Seven Values" and our Code of Business Ethics;
- It bears a reasonable relationship to the value of the benefit obtained;
- It is not made to gain an undue advantage;
- It is not paid for in petty cash; and
- It is recorded fairly and accurately in Group company's books and records.

At the end of each year, each Group company local Marketing & Communication Department must report any sponsorship and the results so achieved to both **the Corporate Marketing & Communication Department** and to **the Group General Secretary** so as to be able to consolidate all our sponsorships at the Group level.

Practical Scenario

The Group company in which you work sponsors an international event. Can you invite a client to this event and offer him transportation and/or accommodation?

The sponsorship activity and its financing must be authorized according to the rules above relating to sponsorship (see 2.1). Taking advantage of this activity to invite certain people and promote the image of the company is possible but these invitations must both:

- Respect the rules relating to travel and accommodation (see 1.4); and
- Be authorized by the person who validated the sponsoring operation (country manager or Marketing and Communication Department of the Group as appropriate).



2.2. Political Contributions

Even if the Group is involved in the communities in which it lives and operates, it is the Group's policy not to make, directly or indirectly through a third party, any cash or in-kind contribution to any political organization.

Practical Scenario

A political candidate asks you to finance his/her legislative campaign. Do you have the right to make such a donation?

Yes, but only if the contribution is made in a personal capacity, is not associated with the name of the Group and does not benefit the company in which you work.

2.3. Charitable Donations

In certain circumstances, the Group wishes to have a positive impact on the communities in which it operates and where Group company employees live. As a major global player, it works with national and international organizations on community projects.

However, to avoid a donation being used to camouflage a bribe, the SBU Chief Financial Officer must be accountable for the charitable donation and ensure that:

- The charitable organization's goals are compatible with the Group's "Seven Values" and our Code of Business Ethics and our Corporate Social Responsibility policy;
- The organization is a legitimate charitable organization;
- A donation request is made in writing by the recipient, describing the charitable purpose of the donation (education, diversity or humanitarian projects) and sufficient details about the recipient;
- The recipient is screened to determine that it has no connection to an individual who is in a position to act or make a decision in favor of the Group, and there is not otherwise an intention to unduly influence a decision or secure an undue advantage;
- The recipient has warranted in writing that the donation will not benefit, directly or indirectly, any individual who has decision-making power on a pending or anticipated matter that could affect the Group's interests;
- Payments are never made in petty cash or to an individual's private account;
- The recipient has issued a written receipt of the donation, specifying the amount received;
- The donation is recorded fairly and accurately in the Group company's and Group books and records; and
- All documentation is maintained in view of possible future audits.

The General Counsel-Ethics & Compliance Officer must be consulted by the SBU Chief Financial Officer and his or her advice must be followed.



Before making a donation exceeding €15,000 (or its equivalent in local currency) annually, the SBU Chief Financial Officer must obtain the **Group General Secretary's** approval.

At the end of each year, the SBU Chief Financial Officer must report any charitable donations to the **Group General Secretary** for consolidation.

Practical Scenario

You are asked at your place of work to donate to a charity. How to react?

You are free to donate to a charity in your own name. However, if you are asked to make a donation on behalf of the Group company in which you work, contact the Chief Financial Officer.

3. CONFLICTS OF INTEREST

A conflict of interest arises when our personal interests — be they financial or other interests, be our own interests or those of our relatives — actually influence, potentially influence or may be perceived to influence, the objective exercise of our professional duties and responsibilities.

Certain situations may present actual, potential or perceived conflicts of interest:

- When a relationship with a business partner may influence or give the impression of influencing our loyalty to Group companies or our ability to make professional decisions in the interest of the Group;
- When the use of the property of a Group company or the information obtained in the course of our professional activity may bring us, or a relative, an advantage.

Employees must disclose promptly to their respective manager any situation of an actual, potential or perceived conflict of interest.

Employees must make decisions in the interest of the Group irrespective of their personal interests.

The **General Counsel-Ethics & Compliance Officer** must be consulted for any questions relating to conflicts of interest.

To identify whether a situation might create a conflict of interest, ask yourself the following questions:

- How might this situation look to someone outside Capgemini? Would you be uncomfortable if one of your staff knew? What would you do if you learned that someone on your team was in this situation?
- Would you or any of your relatives gain benefit by virtue of your relationship with the third party?
- Is the situation likely to affect any decision you might take at Capgemini?
- Do you feel a sense of obligation due to the relationship you have with the third party?
- Does the relationship you have with the third party appear to compromise your ability to make a decision in Capgemini's interest?



If the answer to any of the above is “Yes” or “Maybe”, you are involved in an actual, potential or perceived conflict of interest. You must inform your manager.

There is nothing wrong in being confronted with a conflict of interest — each of us has a social life. What matters is to be aware of the existence of actual, potential or perceived conflicts of interest and to properly disclose any such conflict (and if you are a manager, to clear it in accordance with our policies and guidelines).

Practical Scenario

The responsibilities of a relative require him/her to conduct business with Capgemini in the same area of work where you have influence over business decisions, for instance:

- **A relative works for a Capgemini supplier that has recently submitted a proposal to Capgemini, and your manager wants you to join the review team to evaluate all bids, including the one submitted by your relative.**
- **A relative works for a Capgemini client and your manager wants you to join the bid team to convince the client to do business with us.**

You must report these situations to your manager as soon as you become aware of them. He or she will take the steps to determine whether further action is required. Should you need clarifications, contact your General Counsel-Ethics & Compliance Officer.

4. LOBBYING

Lobbying can be defined as an activity intended to influence a public decision and in particular the content of a law or a regulatory act.

In some countries, such as France, the representation of interests is defined by law with specific criteria, must be declared and is subject to strict ethical rules, in particular:

- the obligation to refrain from proposing or giving to their contacts gifts, contributions or advantages of significant value,
- the obligation to refrain from organizing events or meetings in which the methods of speaking by the representatives of the public authorities are linked to the payment of remuneration.

Any lobbying activity carried out on behalf of the Group must be transparent, in accordance with the applicable legislation and approved by the Group General Secretary.



5. DUE DILIGENCE IN RESPECT OF THIRD PARTIES

The Group company employees in charge of hiring suppliers (such as consultants, subcontractors and other providers of goods and services) should ensure that the candidate has both the requisite qualifications and a solid reputation for business integrity. Our procedures should be proportionate to the risks faced by the Group companies. This Anti-Corruption Policy recognizes that the corruption threat varies across jurisdictions, business sectors, suppliers and the scale and complexity of transactions and that the level of due diligence conducted may legitimately take these factors into account.

Please refer to the "Third Party Evaluation" procedures established by the Legal Department.

6. JOINT-VENTURES, CONSORTIUMS AND MERGERS & ACQUISITIONS

Joint ventures, consortiums and mergers & acquisitions are strategic transactions that represent important liability risks in terms of corruption. Group companies may be held liable for corrupt practices committed by joint venture or consortium partners as well as by companies that a Group company has acquired.

It is important to apply appropriate anti-corruption due diligence to partners and target companies prior to entering into a joint venture, consortium, a merger or an acquisition (or, if the circumstances so require, immediately thereafter).

Please refer to the procedures established by the Legal Department.

7. REPORTING VIOLATIONS AND CONCERNS

7.1. Advocating for Integrity

The Group relies on all executives, managers and employees to promote the Group's integrity culture. The persons most exposed to corruption risk should discuss with executives, managers, colleagues, and Legal, HR and Ethics & Compliance Officers on how to assess and anticipate risks and generally raise awareness.

As representatives of the Capgemini companies and of the values upon which the Group is built, employees must explain to clients and third parties that integrity is the foundation upon which Capgemini builds its excellence in delivering innovative solutions and top-quality service. Everyone should know that breaches of this Anti-Corruption Policy are sanctionable.



7.2. Whistleblowing Helpline

Any employee who, in good faith, is personally aware of any form of corruption or influence peddling event may report it through the **"SpeakUp" whistleblowing helpline**.

The SpeakUp helpline is a confidential web and phone-based intake system operated by an independent service provider and provided by Capgemini to its employees, suppliers, customers and business partners and those of its affiliates.

The purpose of SpeakUp is to report concerns or ask for advice and guidance about accounting, auditing, corrupt practices, unfair competition and other forms of misconduct that do not comply with our 7 Values or our Code of Business Ethics. It is important to distinguish SpeakUp from a grievance helpline; SpeakUp is not a platform to raise HR-related issues.

In certain countries, the SpeakUp helpline can only be used to report suspected violations of a more limited number of matters. To know the exact scope of matters that can be reported in your country, please refer to the SpeakUp Policy (SpeakUp Data Protection & Privacy Notice) or contact your General Counsel-Ethics & Compliance Officer.

Use of the SpeakUp helpline is entirely voluntary. As a reminder, the normal route for reporting a possible violation is to do it directly to your manager or to a representative of the HR, Ethics, or Legal Departments.

If you feel that you are unable to follow the normal route for reporting a possible violation, you may use the SpeakUp helpline to report your concern.

The Group prohibits all retaliation against an employee who reports in good faith a breach of the rules or laws, even if the charge subsequently proves unfounded. Acting in good faith means acting without malicious intent or dishonesty. No voluntary transmission of false information is tolerated.



8. GENERAL RECOMMENDATIONS

The following are some general recommendations for maintaining compliance with this Policy. They are not exhaustive.

8.1. *DON'Ts...*

DON'T offer a gift or an invitation to a public official to induce him/her to speed up the execution of an administrative task such as processing a file or issuing an authorization;

DON'T offer a gift or an invitation to a public official to induce him/her to use his/her influence to obtain a decision from a third party which is favorable to you (influence peddling);

DON'T give or offer to make a gift or an invitation to a salesperson to induce the renewal of a contract;

DON'T accept anything of value in return for the improper performance of your duties such as giving confidential information to a supplier within the framework of a competitive tender;

DON'T offer a bonus to a colleague to induce him/her to give you an unfair advantage, such as hiring one of your relatives or creating a business relationship with a company run by one of your relatives;

DON'T conclude or promise to enter into a contract in exchange for an honorary position in an organization;

DON'T offer to hire a relative of a superior to obtain undue advantages;

DON'T establish an unrecorded fund for any purpose or make or contribute to a false entry in the Group companies' books;

DON'T ignore violations or potential violations of this Anti-Corruption Policy or any applicable anti-corruption laws or regulations;

DON'T induce someone else to violate this Anti-Corruption Policy or any applicable anti-corruption laws and regulations, including by ignoring violations of the same.

8.2. *DOs...*

DO adhere strictly to this Group Anti-Corruption Policy in your activities;

DO ensure the reasonableness of the gifts and invitations you offer or accept;

DO ensure that our payments whether by cash, check or otherwise comply with the Blue Book and established financial procedures;

DO accurately, correctly and without delay record information for all payments the Group makes or receives in reasonable detail, specifying in particular the amount, the recipient, the purpose and the



approvals;

DO report any false or misleading entries, or unrecorded payments, or offers of payment in return for improper activity, immediately to your manager or your General Counsel-Ethics & Compliance Officer;

DO respect the policy regarding the evaluation of third parties and be particularly vigilant in the choice of partners, especially when the third party:

- Requests to make contributions to political or charitable activities;
- Has been recommended by a public official;
- Is "politically exposed", that is to say, is in contact with or has family, friendly or commercial ties with a public official;
- Carries out business operations on behalf of one of the Group's companies in a country known for endemic public corruption;
- Requests to keep his/her engagement with the Group companies, or the terms thereof, secret.

Remember that you are not alone and you can always contact your supervisor and your **General Counsel-Ethics & Compliance Officer** for any questions or assistance in this area.



C. ANTI-CORRUPTION TALENT HUB

https://talent.capgemini.com/global/pages/about_us/our_group/ethicsandcompliance/policies_guidelines/policies/Group_Anti_Corruption_Policy/

In this section of the site you will find useful information on anti-corruption issues.

The section includes:

- The Group's legal policies;
- The list of Legal Officers with their contact details;
- Training materials.

Do you need help?

For further information on these issues, please contact the General Counsel-Ethics & Compliance Officer.

About Capgemini

A global leader in consulting, technology services and digital transformation, Capgemini is at the forefront of innovation to address the entire breadth of clients' opportunities in the evolving world of cloud, digital and platforms. Building on its strong 50-year heritage and deep industry-specific expertise, Capgemini enables organizations to realize their business ambitions through an array of services from strategy to operations. Capgemini is driven by the conviction that the business value of technology comes from and through people. It is a multicultural company with 200,000 team members in over 40 countries. In 2017 the Group achieved €12.8 billion in revenue.

Learn more about us at www.capgemini.com



People matter, results count.