



HUMAN RIGHTS POLICY

Capgemini 

CAPGEMINI HUMAN RIGHTS POLICY

CONTENTS

MESSAGE FROM THE GROUP CEO	3
OUR COMMITMENT	4
OUR PROGRAM	9
GOVERNANCE	9
APPENDIX	10



MESSAGE FROM THE GROUP CEO

Capgemini is—and always has been—a people company, founded on the belief that technology should be designed by humans, for humans.

Capgemini's Human Rights Policy provides a clear framework so that we, as a company and through each of our employees, continue to protect and uphold human rights.

Acknowledgement of the freedom of each individual, and the trust in others that this implies, are fundamental to the respect for human dignity. Freedom and trust underpin the Universal Declaration of Human Rights, and make up two of Capgemini's seven core Values. Since its foundation Capgemini is therefore naturally inclined to an unwavering respect of human rights, and we consider this prerequisite to achieving our ambition to positively impact all stakeholders in our ecosystem.

Building together on this solid foundation we will realize our ambition for digital transformation to benefit all humans – and fulfill our purpose to unleash human energy through technology, for an inclusive and sustainable future.

Aiman Ezzat
Capgemini Group CEO

OUR COMMITMENT

Signatory to the [UN Global Compact](#), Capgemini is committed to protecting and preserving human rights in accordance with the [United Nations Universal Declaration of Human Rights](#), the [UN Guiding Principles](#) on Business and Human Rights, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work ("[ILO Declaration](#)") with its 8 core conventions.

As a people company, our first obligation is to protect and promote human rights across our employee base (permanent headcount, temporary agency staff, freelancers, independent workers, employees of subcontractors, and trainees), supply chain, client interactions, and the local communities where we operate. With our uniquely collaborative way of working, we nurture trusting, long-term relationships with all stakeholders in our ecosystem.

Operating in nearly 50 countries, with a representation of over 100 nationalities, we are multicultural, diverse by nature. We encourage our team members to bring their authentic selves to work, so our teams benefit from every individual's contribution. We ensure a safe, fair, and open work environment where our talents thrive, working creatively and in confidence.

Our clients trust us to deliver boldly innovative solutions, while maintaining our demanding ethical standards. Our suppliers engage to meet these standards, reflected in our [Supplier Standards of Conduct](#), spreading the benefits of our ethical culture.

Mindful of our duty to our planet and future generations, we also act to minimize our impact on the environment, and proactively reach out to contribute positively to the communities where we are present.

Along with our overarching [Code of Business Ethics](#), which is fostered by our commitment to human rights, the Group respects all local laws applicable and applies other necessary policies (see Appendix) across the organization. To address any violations or risks of violation of human rights, we have implemented our global helpline [SpeakUp](#), accessible 24/7 by our employees, suppliers, and clients. These measures enable us to ensure that we do business ethically and respect human rights in all spheres of our business practices.





The following articulates our unwavering commitment to key human rights issues, as a leading ethical company:

Equal opportunity and fair treatment

In the spirit of our Value of Freedom, tolerance and respect for other cultures and customs are essential. We aim to provide equal opportunities and fair treatment, irrespective of social, cultural, ethnic or national origins, religious or other beliefs, caste, gender identity/expression, marital status, pregnancy status, sexual orientation, disability, age, skin color, race, parental status, political ideology, military/veteran status, or trade union activity. Our Human Resources teams across all countries have put in place Diversity & Inclusion programs. We are also committed to complying with all non-discrimination laws.

We believe that the factors that make people different from each other are a source of innovation, creativity, and performance. By bringing in a range of talent, we gain different perspectives, which is essential in the rapidly changing world in which we operate.

Freedom of expression

Our Values of Freedom, Team Spirit and Trust encourage us to work together and to recognize the importance of freedom of expression and open dialogue. Recognition of the right to freedom of expression is therefore deeply rooted in our Values and the way we operate. At Capgemini, we believe in aligned entrepreneurship, which is based on collaboration, celebrating differences, and encouraging all our employees to express freely their thoughts, arguments and opinions, and engage in open dialogue during team meetings, conference calls, forums, and employee surveys, without any fear of retaliation. We conduct regular Pulse surveys among our employees on a variety of topics inviting them to share their honest feedback anonymously.



Freedom of association and collective bargaining

Complementary to freedom of expression and open dialogue is the right to freedom of association and collective bargaining. We respect our employees' right to form and join a trade union, in accordance with national laws, and we recognize such organizations for the purpose of collective bargaining. Our employees can exercise their right without fear of intimidation or reprisal, and irrespective of the country where they are

located, while respecting local laws. We ensure that all our employees have recourse to consultation and dialogue.

At Group level, we have an international representative body called the International Works Council (IWC), which facilitates dialogue and consultation between employee representatives or other employee representative associations and Group management.

Harassment-free work

We are committed to maintaining a work environment that is free of harassment, violence, or any action that creates a threatening workplace; this includes any attitude, form of behavior, or situation that may be specified as harassment. Our employees are expected to be mindful and respectful of personal and cultural differences, both among peers and between a manager and team member, so that everyone can contribute as their unique and authentic self, and enjoy a comfortable atmosphere at work and work-related events.

Our [SpeakUp helpline](#) is made available 24/7 to all employees who wish to report any unprofessional behavior or any type of harassment they may be facing.

Safe and healthy workplace

We are committed to looking after the health and safety of our employees, whether working on our own sites or on our clients' sites.

The Group takes its health and safety responsibility very seriously, and we strive to adhere to all relevant legislations and emergency procedures in this regard. When working on a client's site, we expect our employees to observe and cooperate with any client rules regarding health and safety and emergency procedures. We also have specific guidelines for our employees to follow while traveling on business.



Protection against child labor, forced labor, and human trafficking

Capgemini does not employ minors or children in any part of its business, and strives to ensure that its suppliers and clients do not practice child labor in any form in their supply chains and business operations.

Capgemini does not use forced, bonded, or compulsory labor, and all its employees are free to terminate their employment at any time, by providing reasonable notice.

Employees are in no case required to lodge deposits or money with Capgemini to secure their employment either before or during their term of employment.

As a leading ethical company, we maintain reasonable working hours to not overburden our employees. We recognize the right of our employees to disconnect and rest. We comply with labor laws in all countries where we are operational and allow at least the locally prescribed time off to our employees. We promote flexible working, to give our employees the freedom to choose how they balance their work and personal life.

Our collaborative style of management ensures we set business objectives that are reasonable for our team members and our clients. We also ensure we pay our employees fairly for their contributions.

Data privacy

Capgemini is committed to protecting all personal data entrusted to its employees, clients, suppliers, and any other business partner or individual it works with, because ensuring data privacy also means protecting fundamental rights and freedoms of the individuals to whom the data relates.

Capgemini complies with the applicable data protection legislations and is committed to applying the highest standards when processing personal data. In particular, Capgemini values the importance of Privacy by Design to ensure that the processing activities it carries out encompass all the data protection principles. To make these commitments real, Capgemini has implemented a comprehensive data protection program and the relevant policies, processes and guidelines.

Right to education

At Capgemini, we support continuous learning for all our talents, because we believe that learning plays a vital role in the development of our team members.

We invest in learning and development, creating learning paths fitted to the needs of our employees not only for the time that they spend at Capgemini, but also to enable them to be future-ready. Our learning portals offer our employees a plethora of different training courses, empowering them to fully customize and optimize their individual learning journey.

We embed learning in our culture and our daily work, and strive to ensure that the learning experience provided is unique, from hard to soft skills.



Digital inclusion

We are committed to provide quality education on digital to disadvantaged people across the communities of our operations, through the Digital Inclusion pillar of our [CSR strategy](#). Our goal is to help socially and digitally excluded people across the world to overcome their exclusion by:

- I. Providing basic digital literacy skills, empowering them to take their first steps toward digital autonomy, and
- II. Providing training in specialized IT courses to those lacking the opportunity to go to university, or experiencing long-term unemployment, enabling them to find employment and be integrated into the new world of work.

Protecting human rights through our ethical approach on AI solutions

At Capgemini, we believe that fundamental human rights should never be undermined by the uses made of Artificial Intelligence (AI) by business. That is why human-centricity is at the core of the AI solutions we design.

We care about the intended purpose of AI solutions, being mindful of the impact on humans. We respect universal fundamental rights, principles, and values, in particular the UN Universal Declaration of Human Rights and the UN Global Compact. We aim to build AI solutions that improve life for humans and do not in any way either exacerbate existing harm or create new harm for individuals. Capgemini strives for all teams working on AI solutions to be diverse and inclusive.

We also make sure that we embed these principles in the AI system's life cycle.

To ensure that our AI solutions are human-centric, we have a dedicated [Code of Ethics for AI](#) which puts human rights at the core of how we conceive, design, and build AI solutions.

OUR PROGRAM

At Capgemini, we have incorporated necessary policies, processes, and guidelines throughout our organization, to ensure we uphold and respect the above-mentioned rights and standards.

We have several mandatory training programs, to increase awareness on human rights across our workforce. Through dedicated internal hubs, newsletters, and training materials, we regularly engage with employees and educate them on ethics and human rights topics.

We communicate extensively across the Group on existing grievance mechanisms and processes, to empower our employees, suppliers and clients to raise concerns or queries about unethical conduct. We protect all who report in good faith, so concerns can be raised without fear of retaliation. We ensure that all necessary confidentiality measures are taken.



The global helpline that we have implemented across the Group for this purpose is [SpeakUp](#), a 24/7 web and phone-based reporting and incident management tool.

We regularly review our approach, with the aim of continuously improving our program.

GOVERNANCE



The ultimate accountability for Capgemini's human rights policy commitment lies with the Group CEO, under the monitoring of the Ethics and Governance Committee of the Capgemini Board of Directors. The responsibility of implementing the policy lies with operational and functional leaders across the Group, supported by an implementation program driven by the Chief Ethics Officer and country Ethics & Compliance Officers. We work together to embed human rights in our day-to-day operations, to ensure respect and fulfillment of human rights as per international standards and as mentioned herein.

APPENDIX

Charter of the Ethics and Governance Committee

https://www.capgemini.com/wp-content/uploads/2020/09/Charter-Ethics-Governance-Committee_CGSE_02.09.2020.pdf

Code of Business Ethics

https://www.capgemini.com/wp-content/uploads/2021/02/Capgemini-CBE_2021_English-v3.1.pdf

Code of Ethics for AI

https://www.capgemini.com/wp-content/uploads/2021/03/Capgemini_Code_of_Ethics_for_AI_2021_EN.pdf

Data Privacy

<https://www.capgemini.com/resources/capgemini-binding-corporate-rules/>

Our CSR strategy

<https://www.capgemini.com/our-company/our-corporate-social-responsibility-program/>

SpeakUp helpline

[https://app.convergent.com/en-us/LandingPage/21bd0129-fee2-e611-80d9-000d3ab1117e](https://app.convercent.com/en-us/LandingPage/21bd0129-fee2-e611-80d9-000d3ab1117e)

SpeakUp Policy

https://www.capgemini.com/wp-content/uploads/2019/05/Capgemini_SpeakUpPolicy_English.pdf

Supplier Standards of Conduct

https://www.capgemini.com/wp-content/uploads/2020/03/Capgemini_Supplier_Standards_of_Conduct.pdf

UK 2021 Modern Slavery Transparency Statement

<https://www.capgemini.com/gb-en/wp-content/uploads/sites/3/2020/06/2021-Modern-Slavery-Transparency-Statement.pdf>



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 270,000 team members in nearly 50 countries. With its strong 50 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, fuelled by the fast evolving and innovative world of cloud, data, AI, connectivity, software, digital engineering and platforms. The Group reported in 2020 global revenues of €16 billion.

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Group Anti-Corruption Policy

Version 3



Table of Contents

OUR COMMITMENT	3
A. PROHIBITED CONDUCT	5
1. WHAT IS CORRUPTION IN GENERAL?	6
2. CORRUPTION OF PUBLIC OFFICIALS	7
3. PRIVATE CORRUPTION	7
4. INFLUENCE PEDDLING.....	8
5. EXTORTION.....	9
6. FACILITATION PAYMENTS	10
7. FRAUDULENT BOOK- AND RECORD-KEEPING	11
B. PRACTICAL GUIDANCE TO AVOID RISKY CONDUCT	12
1. HANDLING BUSINESS RELATIONSHIPS.....	13
1.1. Basic Principles	13
1.2. Entertainment	15
1.3. Meals	16
1.4. Gifts	17
1.5. Travel and Lodging.....	18
1.6. Sponsorships, Marketing and Sales Events	20
2. POLITICAL CONTRIBUTIONS AND CHARITABLE DONATIONS	22
2.1. Political Contributions	22
2.2. Charitable Donations	23
3. CONFLICTS OF INTEREST	25
4. LOBBYING.....	26
5. DUE DILIGENCE IN RESPECT OF THIRD PARTIES	26
6. JOINT-VENTURES, CONSORTIUMS AND MERGERS & ACQUISITIONS	28
7. REPORTING VIOLATIONS AND CONCERNS-SpeakUp	28



Corruption is the complete opposite of what Capgemini stands for.

Founded more than 50 years ago by Serge Kampf on strong core Values, Capgemini has always been relentless against disloyal business behaviors and corruption.

To stay true to our guiding principles, each of us must be able to recognize risky situations and know how to handle them. This Group Anti-Corruption Policy presents corrupt practices, principles to be followed, and approvals required to protect our Group against corruption and maintain our reputation for integrity. It provides practical guidance based on common risk scenarios and explains where to find support.

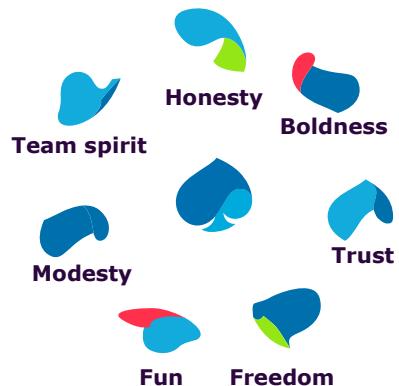
As Chief Executive Officer, my duty and commitment are to prevent, ban and sanction behaviors that are against the Values and business ethics of Capgemini. I count on you to comply with this Policy.

Sincerely yours,

Aiman Ezzat, Chief Executive Officer

The Purpose of a Policy on Preventing Corruption

Capgemini employees take pride in our success because it is anchored in our core Values, including honesty and trust. We have had a Code of Business Ethics since 2010 and a detailed anti-corruption policy in effect long before it was a legal requirement. Since 2016, the Capgemini Group and 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” — which specifically mandates an anti-corruption policy and the implementation of a related program. The Group is also committed to comply with all other applicable anti-corruption laws all over the globe 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 consolidated subsidiaries worldwide, the FCPA and the UK Bribery Act 2010 also have certain extraterritorial reach.



What are the Objectives of our Group Anti-Corruption Policy?

In accordance with our Seven Values, our Group Anti-Corruption Policy testifies top management’s commitment to preventing and detecting corruption: Capgemini has zero tolerance for corruption. To help our employees make good on this commitment, the first practical objective of our Group Anti-Corruption Policy 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 a Group company — regardless 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 practical objective of our Group Anti-Corruption Policy is to define the standards and rules on activities, such as gifts, meals or entertainment and corporate sponsorship that could lead to or be interpreted as corrupt practices. It is crucial for us to collectively defend and protect our Seven Values by defining, implementing and effectively complying with the standards set out in our Group Anti-Corruption Policy.

The third objective of our Group Anti-Corruption Policy is to express our conviction that honesty fosters competitiveness and is the socially responsible way to behave. 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 for our clients, business-partners, employees and society at large.

By publishing and widely disseminating our Group Anti-Corruption Policy, we explicitly restate our 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 our working environments to our employees and business partners.

Compliance with our Group Anti-Corruption Policy and Sanctions

This edition supersedes and replaces earlier versions of our Group Anti-Corruption Policy in each jurisdiction where the Group conducts business, effective, where needed, upon translation and integration into our internal rules — e.g. *règlement intérieur* in France — according to local labor laws.

Our Group Anti-Corruption Policy is distributed to all employees through the Talent Intranet and is publicly available on the Capgemini external websites. All employees must read, understand and comply with it. Compliance is a condition of employment. Violations, regardless of the Group company or place of activity, may lead to disciplinary sanctions, up to and including termination of employment, as foreseen by applicable local regulations, including the applicable Collective Bargaining Agreements. Violating anti-corruption laws can also expose individuals to civil damages, criminal fines and other penalties, including imprisonment.

Our Group Anti-Corruption Policy will be reviewed and updated as needed to reflect changes to the applicable legislation or, at least every three years.



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 directors, executives and employees at any level of the Group. Third parties interacting with a Group company — consultants, subcontractors, suppliers, clients and others — are also expected to comply with these general principles.

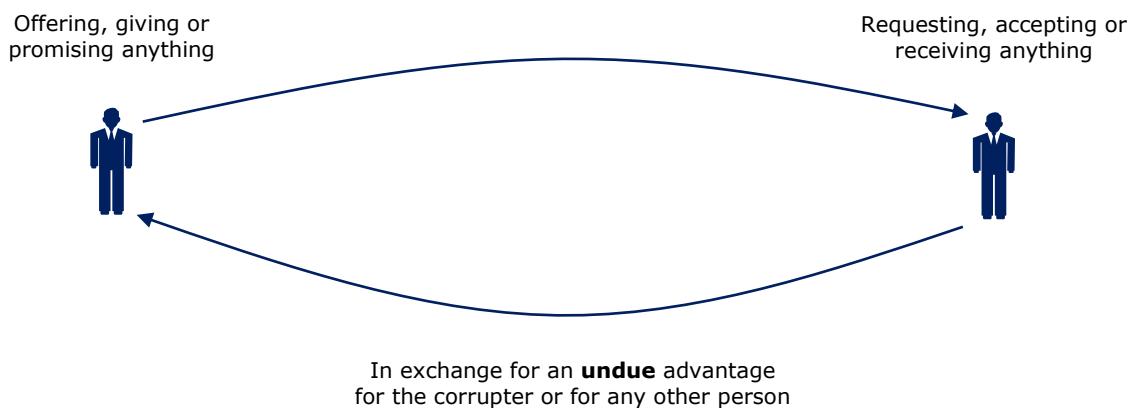


1. WHAT IS CORRUPTION IN GENERAL?

In legal terms, corruption can be broadly defined as: "**offering or giving anything in order to obtain an undue advantage.**" It is also defined as "**requesting, accepting or receiving anything in exchange for 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, charitable donations 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 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 corrupt practices condemned by law. *Authorizing* such action is equally an act of corruption. Moreover, the offering or giving may be made "**at any time**", including *after* the undue advantage has been granted in the form of an award.

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 has zero tolerance for corruption, whether public or private, whether direct or indirect.



2. CORRUPTION OF PUBLIC OFFICIALS

Corruption of public officials may be defined as "the promise, offering, 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, including but not limited to:

- holding a legislative, executive, administrative or judicial position;
- elected or appointed to provide a public service and/or perform any public function, including as agents;
- employed by a state-owned or -controlled enterprise;
- who is a royal family member;
- who is a public servant of an international governmental 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.

For purposes of our Group Anti-Corruption Policy, close relatives of public officials, even if they are not a public official themselves, should be treated as if they were. The promise, offering or giving an undue advantage to a close relative of a public official carries the same sanction as conferring an undue advantage directly on an official himself or herself.

3. PRIVATE CORRUPTION

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

For example, a supplier 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 as well as our Group Anti-Corruption Policy.

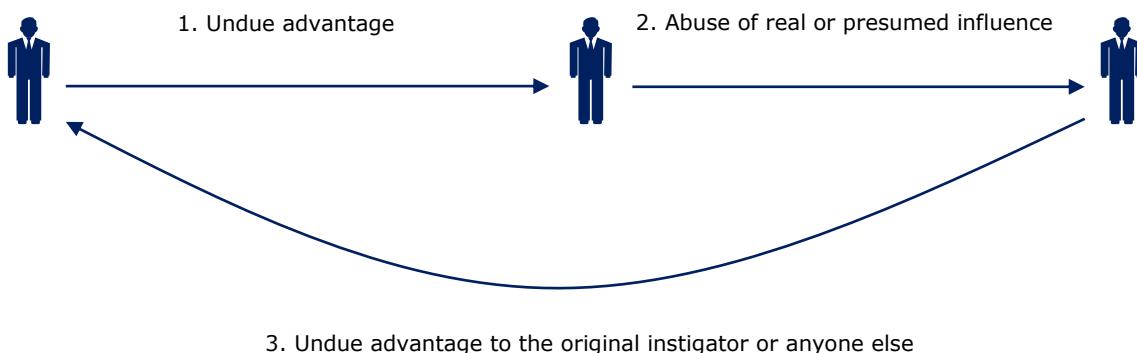
It is important to understand that both promising or giving anything, on the one hand, and requesting, accepting or receiving something, on the other, personally or through an intermediary, are corrupt practices condemned by law and a violation of our Group Anti-Corruption Policy.



4. INFLUENCE PEDDLING

Influence peddling may be defined as “the promise, offering or giving to any person, directly or indirectly, an undue advantage for that person to abuse his or her real or presumed influence to obtain an undue advantage from a public authority for the original instigator or any other person.”

Influence peddling also includes the solicitation or acceptance by any person, directly or indirectly, of an undue advantage for himself/herself or anyone else for that person to abuse his or her real or presumed influence with a view to obtaining an undue advantage from an administration or public authority.



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 has zero tolerance for any form of influence peddling, whichever the country or the activity concerned.

Practical Scenario

Capgemini intends to submit an offer to a bid organized by the Ministry of Defense in a country, which is looking for artificial intelligence solutions. During the bid process, you meet someone who says he knows the official in charge of evaluating the bids very well. He suggests that if you offer him two tickets to the local Formula One Grand Prix, he would highlight the advantages of the Capgemini offer to the bid official and influence the final decision in favor of Capgemini. What should you do?

Even if you can easily get these tickets you must decline the offer. The mere request for such tickets in exchange for exercising influence is inappropriate, and you are at risk of being in a situation considered as the offense of influence peddling: offering an undue advantage — the Formula One tickets — for your contact to use his real or perceived influence over a public official to win preferential treatment for Capgemini, which is an undue advantage. It does not matter if your contact keeps his word or not: influence peddling may be characterized once you provide the undue advantage.



5. EXTORTION

Extortion may be defined as seeking an undue advantage through use of violence, threat of violence or coercion. Blackmail is a perfect example of 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.

Extortion is a form of corruption. Yielding to extortion constitutes a corruption offense in most countries.

The Group prohibits any form of yielding to extortion, whatever the country or the activity concerned, unless a person's life or physical safety is in danger.

Practical Scenario

You work in Corporate Real Estate Services and are responsible for getting an important employee facility available for occupation. Two months before the due date, you realize that the operational license is being intentionally withheld in exchange for a bribe payment. The delay is going to cost the company hundreds of thousands, potentially millions of euros. What should you do?

Such a request is extortion and cannot be agreed. Even under conditions of extortion, where no personal benefit is at stake, a Capgemini employee or agent agreeing to pay a bribe is personally exposed to criminal fines and imprisonment. Moreover, the Capgemini entity can be subject to criminal fines larger than the costs of the delay and other damaging consequences, such as being barred from public procurement tenders. This would be in addition to the reputational harm that Capgemini and the employee may suffer. Furthermore, such behavior would be against our Values. **You should report such violation following the SpeakUp process described in Section 7.**

HOW TO RESIST EXTORTION?

In the first instance you should consult your Manager and your local Ethics & Compliance Officer if you have any questions or need assistance.

For those who wish to delve deeper into the topic, [Resisting Extortion and Solicitation in International Transactions \(RESIST\)](#) is a free tool offering various operational recommendations, based on practical scenarios. 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.



6. FACILITATION PAYMENTS

Facilitation payments may be defined as small amounts paid to a public official to expedite the execution of a routine administrative action to which the payer is entitled. They are intended to encourage public officials to perform their duties, for example, the issuance of an authorization or a permit. They are often paid in cash.

Facilitation payments are illegal in most countries.

Making a facilitation payment is a violation of our Group Anti-Corruption Policy, even where such payment would be legal under local law.

Practical Scenario

You need a visa for your next business trip to India. Unfortunately, the meeting was set up at the last minute and you are running late in the visa application. The civil servant at the Embassy suggests that for a small payment of AU\$50 in cash to him, he can get you the visa tomorrow. Is such a payment a prohibited "facilitation payment"?

Yes. The payment to an individual in his or her personal capacity to perform a service that favors your visa over the issuance to others who also have a right to such service, confers an undue benefit to him or her in exchange for preferential treatment to you. It is therefore a prohibited facilitation payment.

Practical Scenario

You need a visa for your next business trip to India. Unfortunately, the meeting was set up at the last minute and you are running late in the visa application. There is a "fast track" service available at the Embassy to obtain the visa at an additional published cost. Is such a payment a prohibited "facilitation payment"?

No. Since the payment is for an expedited "fast track" service available at an official and transparent price to all persons, this would not be a prohibited facilitation payment.



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.

Practical Scenario

You work in the accounting department. Joe, a friend of yours working in Sales, is negotiating a deal. Joe is aware that his client is a wine enthusiast and he would like to buy a rare bottle of wine worth €1,500 to impress him and win the deal. Joe knows this expense is way above any Capgemini gifts threshold. In the name of your longstanding friendship, Joe asks you to book the expense under a miscellaneous account. Can you?

You must never agree to misclassify a gift or to conceal an expense. Manipulating books and records is a violation of our Group Anti-Corruption Policy and may result in the employee being sanctioned, up to and including termination. Moreover, the Capgemini gift policy is intended to avoid bribery. If Joe offers such an expensive gift, he would put himself in a situation that can be characterized as offering a bribe, which is a criminal offense punishable by heavy fines and imprisonment. Should you agree to misclassify the expense, you will be manipulating a record and you may become an accomplice to the misconduct. Any expense reimbursed directly to an employee must be appropriately recorded as a gift in the expense reimbursement tool.



B. PRACTICAL GUIDANCE TO AVOID RISKY CONDUCT

This section presents the principles that must be followed and approvals that must be obtained to protect our Group against corruption risks. It goes through **common and widespread acceptable corporate practices that, when misused, may be characterized as corruption**. Please remember that our Group Anti-Corruption Policy does not 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 face. Always remember that you are not alone and that you should consult your **Manager** and your local **Ethics & Compliance Officer** if you have any questions or need assistance.

These requirements apply to all Capgemini directors, executives and employees at any level of the Group. Third parties interacting with a Group company — clients, consultants, subcontractors, suppliers and others — are also expected to comply with these principles.



1. HANDLING BUSINESS RELATIONSHIPS

1.1. Basic Principles

All events organized or sponsored by Capgemini, as well as entertainment, meals, gifts, travel and lodging — whether given to or received from a third party — must meet all of the following **basic principles**:

1. It must comply with applicable laws and our Group Policies as well as the 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 or received from the same recipient.
5. **If intended for a Public Official, the entertainment (1.2), meal (1.3), gift (1.4) or the travel and lodging (1.5) must nevertheless be cleared in advance by the local Ethics & Compliance Officer; please note that in some countries offering any of this is prohibited by law.**
6. In addition, all Capgemini expenses incurred must be recorded fairly and accurately in the Group company's books and records.

Before offering or accepting a gift, meal or entertainment, travel or lodging that exceeds the references set out in our Group Travel and Expenses Policy, it is important to check compliance with the basic principles and additional conditions of this Group Anti-Corruption Policy. You are advised to consult with your Manager in advance to ensure you both agree. **Any expense claim above the thresholds defined per country in the Group Travel and Expenses Policy may be rejected by your Manager.**

In case of questions, you may consult your local Ethics & Compliance Officer, whose written advice may be relied upon.



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. In such circumstances, it is generally not considered appropriate to offer a gift or entertainment.

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

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

If in doubt, you should document your offer of entertainment, meals, gifts or travel and lodging in writing. Such invitation should 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.



1.2. Entertainment

Invitations to entertainment events — such as to 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, offering or accepting entertainment invitations are allowed if all the following conditions are met:

- The **basic principles** (1.1) are met;
- The following **additional conditions** are met:
 - A Group company employee is present at the event;
 - The thresholds per country for meals and external invitations defined in our Group Travel and Expenses Policy, should be used as a value reference; and if the value permitted by the third party's employer is lower, you must respect them;
 - The entertainment is legal and socially acceptable.

Entertainment invitations above the thresholds must be approved by your Manager in advance of extending such invitation. When you pay for an invitation expense and then request reimbursement, Manager approval may be evidenced through approval of your expense reimbursement claim.

In case of questions, you may consult your local Ethics & Compliance Officer, whose written advice may be relied upon.

Practical Scenario

You oversee 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 a prestigious tournament. 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 even be considered as 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 your Manager in writing of this proposal and discuss with him or her to determine the appropriate course of action with respect to that supplier.



1.3. Meals

Doing business over a meal is common practice in the business world. A meal may be offered to or accepted from a third party, if all of the following conditions are met:

- The **basic principles** (1.1) 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 thresholds per country defined in our Group Travel and Expenses Policy should be used as a reference. If the permissible values in the client's applicable policies are lower, you must respect them.

Meal invitations above the thresholds must be approved by your Manager. Manager approval may be evidenced through approval of the expense claim.

In case of questions, you may consult your local Ethics & Compliance Officer, whose written advice may be relied upon.

Practical Scenario

You wish to organize a working meal with your client and you have self-assessed that all basic principles and additional conditions of our Group Anti-Corruption Policy will be met, except that the value per person of the meal will be 25% above the thresholds for your country defined in our Group Travel and Expenses Policy. What should you do?

The thresholds defined in our Group Travel and Expense Policy for external meals are useful references to assess compliance with our Group Anti-Corruption Policy. However, depending on the circumstances, the occasion or the recipient's position, it may still be compliant with our Group Anti-Corruption Policy to organize a meal above the indicative monetary threshold. In such cases it is important to consider and may be useful to document why such a meal is justified under the circumstances and does not present a risk of corruption.

You should liaise with your Manager to ensure that he or she shares your compliance assessment in advance and, in case of questions, you may escalate the assessment to your local Ethics & Compliance Officer. If you do not involve your Manager in advance, he or she may reject your expense claim.



Practical Scenario

During a competitive request for proposal ("RFP"), you would like to obtain information about competing bids. You know one of your competitor counterparts well. Can you take him out to dinner for an informal chat?

No, this could be perceived as a conflict of interest or even attempted corruption. During an active RFP process, you should never invite a competitor to dinner, and you should refuse any such invitation. More generally, you must never attempt to obtain non-public information from any competitor.

1.4. Gifts

Giving small personal gifts is often part of local custom or culture. A Capgemini employee is not allowed to request or demand a gift. While strongly discouraged, a gift given to or received from a third party is permitted, if all the following conditions are met:

- The **basic principles** (1.1) are met;
- The following **additional conditions** are met:
 - It is of a nominal value. The threshold per country defined in our **Group Travel and Expenses Policy** should be used as a reference. If the permissible values in the client's applicable policies are lower, the client's thresholds must be respected.
 - 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.

Other than small standard gifts such as those with a company logo, any gifts offered or proposed to be accepted must be approved in advance by your Manager. If, on an exceptional basis, the gift is bought directly by an employee, Manager approval may be evidenced through approval of the expense claim.

In case of questions, you may consult your local Ethics & Compliance Officer, whose written advice may be relied upon.

Practical Scenario

A supplier offers you a watch with the logo of his or 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. If it is above the threshold per country defined in our Group Travel and Expenses Policy, you must disclose the gift to your Manager.



Practical Scenario

You are travelling to China for business purposes and Chinese New Year is about to start. You have heard during Chinese New Year there is a tradition of giving red envelopes with lucky money inside, especially to youngsters. As gifts are discouraged by our Group Anti-Corruption Policy, you have never bought a gift for any client before. You recognize the importance of providing a gift, but what does "nominal value" for a gift mean? What about the red envelopes with lucky money?

Typically, gifts of nominal value include small mementos and promotional items, bearing the Group name or trademarks such as mugs, pens or calendars, and any of those gifts would be acceptable. Other customary gifts of modest value may include flowers, books or fruit baskets. However, by providing envelopes with lucky money to your client for his or her children you would breach our Group Anti-Corruption Policy twice:

1. it is strictly forbidden to gift someone with cash or cash equivalent — such as gift cards or pre-paid vouchers;
2. it is strictly forbidden to provide a gift to a non-business contact — if it is meant to be for client's children.

You should therefore prefer offering a basket full of oranges — which is also part of the tradition.

1.5. Travel and Lodging

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

- The **basic principles** (1.1) 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 our Group Travel and Expenses Policy;
- Payments to cover travel and lodging expenses on behalf of public officials, where legally permissible, must be made directly to the vendors — such as the airline companies, the hotels — or to the public official's agency;
- 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.

Travel and lodging expenses extended to third parties must be approved in advance by your Manager.

Any travel and lodging accepted from a third party must also comply with the principles outlined above.

In case of questions, you may consult your local Ethics & Compliance Officer, whose written advice may be relied upon.

Practical Scenario

One of your clients asks to visit a Capgemini Indian Delivery Center. You are not sure who should pay for the arrangements. As well as the flights and accommodation, you would like to organize a local sight-seeing trip as part of the visit. What is the right approach in such situation?

There is no issue in organizing a visit to Capgemini facilities. However, you should be careful of the travel and lodging arrangements:

1. You need to check if your client has any restrictions under its own anti-corruption or other applicable company policies. If so, you must comply with them.
2. If you pay for your client, you must meet the basic principles (1.1) and additional conditions mentioned above. Any on-site client entertainment or local sight-seeing trips arranged must not include extra travel or overnight accommodation and must comply with the rules on Entertainment (1.3).



1.6. Sponsorships, Marketing and Sales Events

Sponsorships, Marketing and Sales events are appropriate and legitimate business practices. It is important to recognize, however, that improper or excessive sponsorships, Marketing and Sales Events may be a form of bribery or corruption that is prohibited by law and our Group Anti-Corruption Policy.

There are two types of events which Capgemini organizes or sponsors:

Business promotion events are directly related to our business, such as an exhibit, trade show or conference. They are usually large events combining business-to-business advertising and personal selling. These events offer an opportunity for Capgemini to increase its brand visibility and showcase its capabilities to the market — clients, prospects and partners. These events include:

- Capgemini client events organized by us;
- Participation of Capgemini as a sponsor in an event organized by our business partners — e.g. Dreamforce; or
- Participation of Capgemini as a sponsor in sector or industry events — e.g. European Utility Week, Mobile World Congress.

Non-business events organized or sponsored by giving money, goods or services, usually with the purpose of promoting the Capgemini Group or the Capgemini brand — e.g. in return for our brand's presence at an event and/or in the media. Even if such events are not directly business-related, they participate to the Group brand visibility and to the Group advertising and promotion strategy; give opportunity to build legitimate intimacy with clients, suppliers and partners; or to enhance our attractiveness in the talent market. These events may include:

- Sport, culture or public relations events organized by Capgemini Marketing & Communications, Sales, CSR or HR departments; or
- Capgemini sponsorship of an event organized by a sport, cultural, educational or institutional organization.

Sponsorships, Marketing and Sales events are to be distinguished from donations that can be made to charitable foundations as further described under Section 2.2 below.

Sponsorships, Marketing and Sales events approval rules

Employees and any person or entity acting on behalf of the Capgemini Group must never organize or sponsor such events, unless (i) the **basic principles** (1.1) are met, and (ii) the following **additional conditions** are also met:



- The event must be aligned with Group strategy and with Marketing & Communications/Sales' guidelines, our Group's Seven Values and Code of Business Ethics.
- The benefit in kind for the third parties — e.g. clients, partners, market influencers — invited by Capgemini to the event must follow the basic rules and additional conditions relating to invitations and entertainment (1.2), meals (1.3), gifts (1.4) and travel and lodging (1.5).
- However, the indicative thresholds set out in our Group Travel and Expenses Policy for invitations and entertainment (1.2), meals (1.3), gifts (1.4) and travel and lodging (1.5) do not apply. The assessment of benefit in kind will be appreciated as a whole by local Marketing & Communications or Sales using the guidelines outlined in this section.
- When sponsoring a third-party event, **due diligence** has been conducted on the event host as set out in the Section 5 Due Diligence in Respect of Third Parties.

To ensure that business promotion events and non-business events serve their intended business purpose to promote and strengthen the Group brand, and do not create an appearance of impropriety, each such event must be pre-approved in writing by two signatories:

- the relevant BU/GBL/SBU head, as applicable according to the unit originating the request, and
- the Country/SBU/GBL Marketing & Communications Director(s).

Country/SBU/GBL Marketing & Communications Directors shall keep current a consolidated view of all sponsorships and Marketing events sponsored or organized by all operating entities present in their geography for review at any time, which must be sent at year-end to Group Marketing & Communications.

Moreover, events and sponsorships:

- above €30,000 in low corruption risk countries — [Corruption Perception Index from Transparency International](#) above or equal to 50
- and above €15,000 in medium and high corruption risk countries — [Corruption Perception Index from Transparency International](#) below 50

must be escalated by local Marketing & Communications to the **Group Marketing & Communications** for additional validation.

Any event organized or sponsored by Capgemini Sales teams without Marketing & Communications involvement is considered a Sales event requiring Sales approval from the relevant Sales Director(s) and BU/GBL/SBU head in lieu of Marketing & Communications approval.

It is the responsibility of the requestors to perform the marketing and compliance analysis and submit it to relevant heads and directors — as described above — for approval.

In case of doubt when performing the compliance analysis, the Marketing & Communications or Sales Directors must ask the local Ethics & Compliance Officer for advice. **If public officials are invited or involved in the organization of an event, the Marketing & Communications and Sales Directors shall systematically consult with the local Ethics & Compliance Officer.**



Practical Scenario

The Capgemini Group sponsors the Rugby 7s in Dubai. Can you invite a client or partner to this event and offer him or her transportation and/or accommodation?

The sponsorship activity, its financing and the benefit in kind for Capgemini invitees must be authorized according to the rules relating to sponsorships, Marketing and Sales events (1.6). Taking advantage of this activity to invite certain people and promote the image of the company is possible but these invitations must:

- Respect the rules relating to travel and accommodation (1.5);
- Be authorized by the persons who validated the sponsoring operation (1.6); and
- Respect the client or partner's relevant policies.

2. POLITICAL CONTRIBUTIONS AND CHARITABLE DONATIONS

2.1. Political Contributions

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

Practical Scenario

A client asks Capgemini to make a contribution to a politician's campaign. Do you have the right to make such a donation?

No. It is against Capgemini policy to make contributions to any political organization, even one that you may personally support.

Practical Scenario

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

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



2.2. Charitable Donations

At Capgemini, we seek to create a direct and sustainable positive impact in the communities in which we live and operate, and to integrate Corporate Social Responsibility ("CSR") into our core business strategy. It is important to recognize, however, that charitable donations may create a conflict of interest or be construed as a form of bribery or corruption that is prohibited by law and our Group Anti-Corruption Policy.

There are two principal sources of charitable donations in Capgemini:

- Charitable donations identified by CSR to further our CSR strategy, and
- Charitable donations identified locally and that are community driven.

Strategic **CSR donations** count as a CSR resource allocation, if they are aligned with Group CSR published strategy — i.e. Digital Inclusion, Environmental Sustainability or Diversity — and meet applicable legal and tax requirements to qualify as donations.

Charitable donations are **community driven** if they are sponsored locally, meet applicable legal and tax requirements to qualify as donations but do not match published CSR strategy criteria. Examples of such local community-driven charitable donations might be buying a table at a gala dinner benefiting a local hospital. It is important to note that these types of charitable donations, frequently initiated through contacts with partners or clients require particular vigilance to ensure the absence of conflicts of interest.

Charitable donations approval rules

Employees and any person or entity acting on behalf of the Capgemini Group must never make a charitable donation unless the ***following conditions*** are met:

- There is enough information regarding the purpose of the donation, to determine it is compatible with our Group's Seven Values and Code of Business Ethics;
- The recipient is a legitimate charitable organization and has undergone a due diligence evaluation **prior** to the donation, as set out in the Section 5 Due Diligence in Respect of Third Parties;
- Any potential – even perceived – conflict of interest situation associated with this donation has been disclosed and cleared;
- Any other ethical concern raised has been appropriately resolved;
- Payments are never made in petty cash or to an individual's private account;
- The recipient agrees to issue 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.



All Charitable donations must be approved by the country local Ethics and Compliance Officer and by:

- CSR, to count as a CSR resource allocation, or
- By the relevant MU/BU/GBL/SBU head/GBL head/country GBL, for community-driven donations.

In addition, donations above the thresholds set out below require the additional approval of the Capgemini Group General Secretary:

- €15,000 in low corruption risk countries — [Corruption Perception Index from Transparency International](#) above or equal to 50, or
- €5,000 in medium and high corruption risk countries — [Corruption Perception Index from Transparency International](#) below 50.

Local Ethics & Compliance officers shall keep a current consolidated view of all charitable donations approved on behalf of all entities present in their geography for review at any time.

Practical Scenario

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

You are free to donate to a charity in your own name if you wish to. However, if you wish to donate on behalf of the Group company in which you work, contact the relevant business approver and your local Ethics & Compliance Officer as outlined above.

Practical Scenario

A client asks Capgemini to financially support a charitable foundation in which he serves on the Board. How should you react?

This request must be carefully vetted to ensure there is no conflict of interest. A charitable donation must never be a condition for the renewal of a business contract and must not be approved nor granted while there is an ongoing bid as it could be construed as a request or granting of an "undue advantage". To protect client interests as well as Capgemini's, please ensure no commitments are made before clearing the request through the procedure established by Ethics & Compliance and meeting the conditions for approval.



3. CONFLICTS OF INTEREST

A conflict of interest arises when our personal interests — be they financial or other interests, whether 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. Put simply, a conflict of interest exists when someone *could* abuse his or her official position for private gain. Conflicts of interest may give rise to acts of corruption, where a person *does* abuse their position for private gain.

There is nothing wrong in being confronted with a conflict of interest — each of us has a life outside Capgemini. What matters is to be aware of the existence of actual, potential or perceived conflicts of interest and to properly disclose any such conflict.

Some common 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 Manager any situation presenting an actual, potential or perceived conflict of interest, and Managers must manage such disclosure, using the procedure described in the Group Conflict of Interest Policy. In case of questions or uncertainty regarding the correct handling of a potential conflict, contact your local Ethics & Compliance Officer.

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

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 colleagues 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.



Practical Scenario

The responsibilities of a relative require him or 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. As a general principle, it would not be appropriate to have influence or decision-making authority regarding a relative. Should you need clarifications, contact your local 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 many countries such as France, lobbying is defined by law, subject to strict ethical rules and must be declared in a public registry if certain conditions are met.

Lobbying is **forbidden** unless it is specifically approved by the Group CEO. Any exceptional lobbying activity carried out on behalf of the Group must be transparent, in accordance with the applicable legislation.

5. DUE DILIGENCE IN RESPECT OF THIRD PARTIES

Third parties may present a risk from an anti-corruption perspective. For instance:

- a client could solicit a bribe;
- suppliers and intermediaries could use a portion of their fees to make a bribe on Capgemini's behalf — even without informing us;
- a third party may be owned or associated with a person Capgemini may wish to influence, resulting in a conflict of interest that must be identified and managed.

Employees in charge of hiring or engaging with third parties for Capgemini, whether clients, intermediaries or suppliers — such as consultants, subcontractors and other providers of goods and services — must ensure that the third party has both the requisite qualifications and a solid reputation for business integrity.

Our third-party evaluation procedures are designed to be proportionate to the corruption risks



potentially raised by such third party, as identified in the Group anti-corruption risk mapping, which is revised from time to time. The corruption threat varies across jurisdictions, business sectors, third parties, the nature of the relationship with the party as well as the scale and complexity of transactions, and the identification of potential corruption red flags. The level of due diligence conducted is designed to take these factors into account.

All third parties must be vetted in accordance with our Group Third-Party Anti-Corruption and Trade Sanctions Due Diligence Policy.

Practical Scenarios

You want to hire Y as a supplier. What must you do?

You must conduct supplier due diligence as per the procedure.

You want to bid for a public request for proposal ("RFP") launched by W in Malaysia. What must you do?

You must conduct client due diligence as per the procedure.

Practical Scenario

You work in the Sales team and are looking for ways to gain new business in a certain sector. You are approached by Mr. Y, a well-known businessman in this area, who explains that he can assist you in gaining new clients for a "finder's fee" — percentage of new sales. How can you proceed?

In addition to complying with the Blue Book rules on Sales Consultants and Agents, all third parties must be vetted according to our Group Third-Party Anti-Corruption and Trade Sanctions Due Diligence Policy. You will read that Sales Agents are prohibited unless exceptionally approved by the Group Review Board, while Sales Consultants — retained on a fixed fee basis — are considered high risk and must be evaluated through an Enhanced Due Diligence. Our Third-Party Anti-Corruption and Trade Sanctions Due Diligence Policy will also provide guidelines on monitoring of Sales Agents and Consultants and their reporting requirements.

Practical Scenario

A potential client informs you that you have won a request for proposal ("RFP") subject to using a certain company or individual X as a sub-contractor on the project. What should you do?

Although there may be legitimate business reasons for a client to request a specific sub-contractor for an engagement, such a condition should nevertheless be considered a red flag. The legitimate business rationale for such a condition and the absence of a conflict of interest must be established and documented. If the rationale is not clear or if you have any doubt, you must consult your local Ethics & Compliance Officer. Please refer to our Third-Party Anti-Corruption and Trade Sanctions Due Diligence Policy for additional guidance.



Practical Scenario

A business leader has identified a donation it would like to make to a highly reputed foundation. Does third party due diligence have to be completed?

Yes. In addition to complying with our Group Anti-Corruption Policy — see Section 2.2 on Charitable Donations — all third parties must be vetted according to our Group Third-Party Anti-Corruption and Trade Sanctions Due Diligence Policy. You will read that charitable donation recipients are considered high risk and must indeed be evaluated through an Enhanced Due Diligence. You will also find related guidelines on monitoring of third parties and periodically refreshing the due diligence.

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 Mergers & Acquisition due diligence procedures and the consortium guidelines.

7. REPORTING VIOLATIONS AND CONCERNS-SpeakUp

Any employee who, in good faith, becomes aware of any form of corruption is encouraged to report it using the [“SpeakUp” ethics helpline](#).

The SpeakUp helpline is a confidential web and phone-based intake system provided by Capgemini to its employees, suppliers, clients and business partners and those of its affiliates.

The purpose of SpeakUp is to report concerns or ask for advice and guidance about fraud, workplace harassment, corrupt practices, conflicts of interest, unfair competition and other forms of ethical misconduct that do not comply with our Seven Values or our Code of Business Ethics.

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 or contact your local Ethics & Compliance Officer.

Use of the SpeakUp helpline is entirely voluntary. As a reminder, the usual route for reporting a



possible violation is to raise it directly to your Manager, [your local Ethics & Compliance Officer](#) or a representative of the Human Resources department.

If you feel that you are unable to follow the usual route for reporting a possible violation, you should use the [SpeakUp ethics helpline](#) to report your concern. You may also use this portal to ask a question.

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. Knowingly reporting false information will not be tolerated.

About Capgemini

A global leader in consulting, digital transformation, technology and engineering services, 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 of 270,000 team members in nearly 50 countries. With Altran, the Group reported 2019 combined global revenues of €17 billion.

Learn more about us at www.capgemini.com



People matter, results count.



Our Code of Business Ethics

How to use our Code of Business Ethics?

Our Code of Business Ethics helps all team members understand how to behave and act in the right way. It is a framework for support if we are unclear. It is impossible for us to envision and prepare for every single business situation that may pose an ethical dilemma. Accordingly, we do not claim that this document is definitive or exhaustive. In three areas where ethical issues are particularly sensitive—fair competition, bribery and corruption prevention, and conflict of interest—there are specific, detailed Group policies that supplement overarching principles in our Code of Business Ethics.

Our Code of Business Ethics does not rule out the need to exercise good judgment, but rather helps us to do the right thing. When in doubt, you should ask yourself the following questions:

- Does it feel right?
- Is it in line with the Group Values, Code of Business Ethics and other company policies?
- Would I be comfortable explaining it to fellow team members, team managers, clients, family or, externally, to the press?
- Is it legal?

If the answer to even one of these questions is “no”, it is probably not the right thing to do. Open a dialogue with your team manager, your Ethics & Compliance Officer, or your HR manager to make the appropriate decision, and to be sure we continue “doing the right thing”. Find your Ethics & Compliance Officer on your Group and local websites—see Appendix for links.

If you have raised a concern locally and you think that it has not been handled properly, or in the exceptional case that it is inappropriate to raise the issue locally, you can reach out to SpeakUp, Capgemini’s phone/web-based ethics helpline—see Appendix for link.

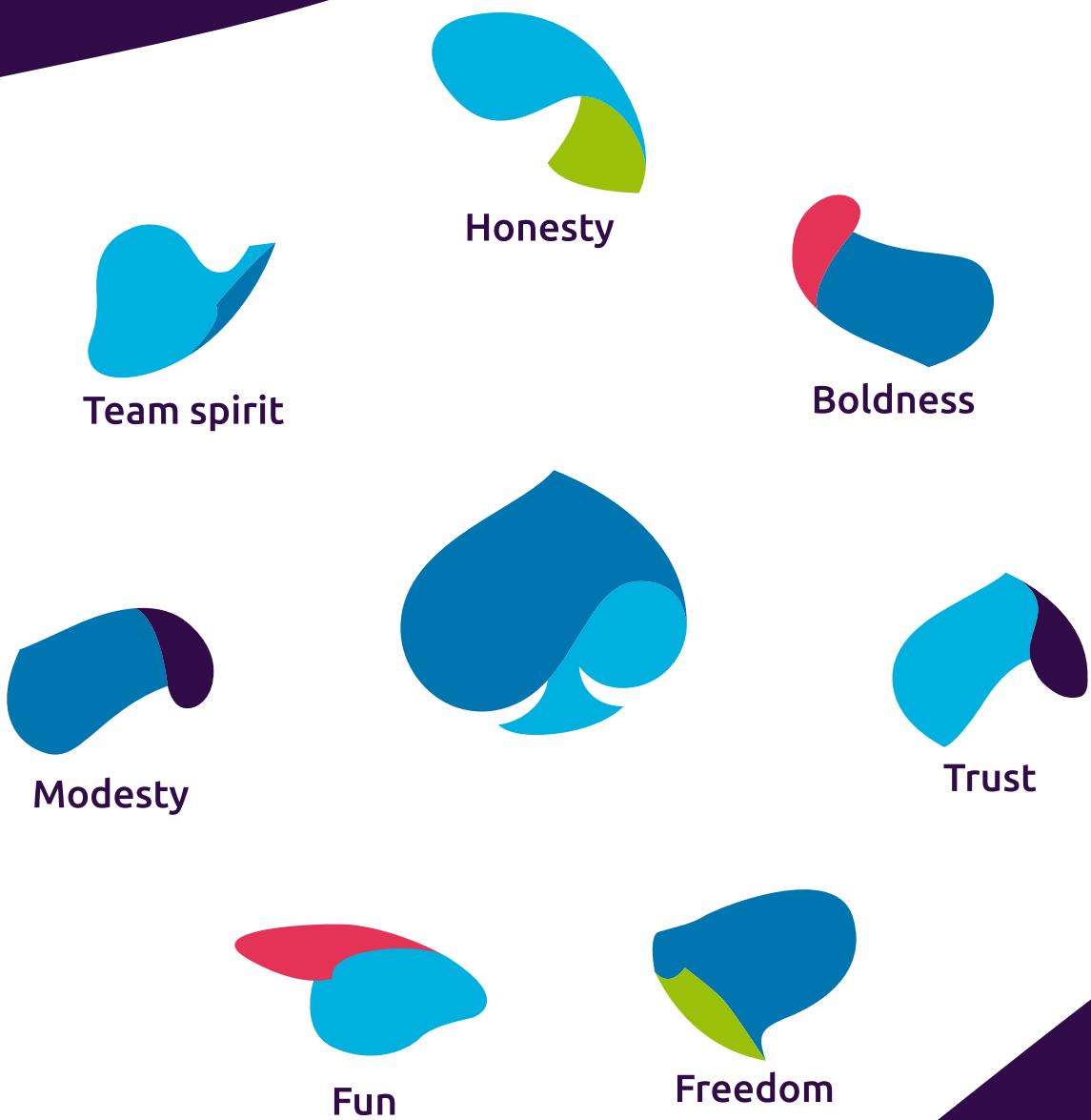
>> Our Code of Business Ethics
*is for all team members, of all the companies of the Group,
collectively referred to in this document as “the Group”.*



"World's Most Ethical Companies" and "Ethisphere" names and marks are registered trademarks of Ethisphere LLC.

Contents





Seven Values lie at the heart of everything that the Group does

Since the creation of the Group in 1967, our culture and business practices have been inspired and guided by our seven core Values. These are the guiding principles that we collectively and individually stand for, and they are at the heart of our approach as an ethical and responsible business.

Our Values also provide the basis for our rules of conduct and principles of action. They are part of our Group DNA, shaping our sustainable ethical culture, and producing a mindset that encompasses integrity and ethical behavior. Our Values are important for respecting, defending, and upholding the Group as an ethical and responsible business, and for protecting our reputation.

HONESTY, loyalty, integrity, uprightness, a complete refusal to use any underhanded method to help win business or gain any kind of advantage. Neither growth, nor profit, nor independence have any real worth unless they are won through complete honesty and probity. And everyone in the Group knows that any lack of openness and integrity in our business dealings will be penalized at once.

BOLDNESS, which implies a flair for entrepreneurship, and a desire to take considered risks and show commitment (naturally, linked to a firm determination to uphold one's commitments). This is the very soul of competitiveness: Firmness in making decisions or in forcing their implementation, an acceptance periodically to challenge one's orientations and the status quo. Boldness also needs to be combined with a certain level of prudence and a particular clear-sightedness, without which a bold manager is, in reality, merely dangerously reckless.

TRUST, meaning the willingness to empower both individuals and teams; to have decisions made as close as possible to the point where they will be put into practice. Trust also means giving priority, within the company, to real openness toward other people and the widest possible sharing of ideas and information.

FREEDOM, which means independence in thought, judgment and deeds, and entrepreneurial spirit, creativity. It also means tolerance, respect for others, for different cultures and customs—an essential quality in a Group of over 270,000 people and 120 nationalities, based in close to 50 countries.

FUN means feeling good about being part of the company or one's team, feeling proud of what one does, feeling a sense of accomplishment in the search for better quality and greater efficiency, feeling part of a challenging project.

MODESTY, that is simplicity, the very opposite of affectation, pretension, pomposity, arrogance, and boastfulness. Simplicity does not imply naivety (simple does not mean simpleton!); it is more about being discreet, showing natural modesty, common sense, being attentive to others and taking the trouble to be understood by them. It is about being frank in work relationships, loosening up, having a sense of humor.

TEAM SPIRIT, meaning solidarity, friendship, fidelity, generosity, and fairness in sharing the benefits of collective work; accepting responsibilities and an instinctive willingness to support common efforts when the storm is raging.

The Board of Directors of Capgemini SE

The undersigned, members of the Board of Directors of Capgemini SE, express by their signature their endorsement and their individual and collective support of the provisions of the Code of Business Ethics.



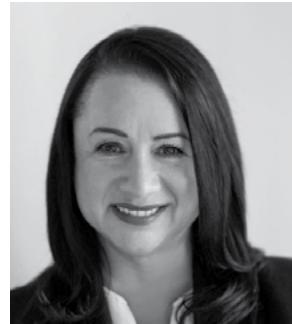
Paul Hermelin
CHAIRMAN OF THE BOARD OF DIRECTORS



Aiman Ezzat
CHIEF EXECUTIVE OFFICER



Xiaoqun Clever



Maria Ferraro



Pierre Goulaieff



Siân Herbert-Jones



Hervé Jeannin



**Belen Moscoso
del Prado Lopez-Doriga**



Xavier Musca



Frédéric Oudéa



Patrick Pouyanné



Olivier Roussat



Tanja Rueckert



Kurt Sievers



Lucia Sinapi

Message from the Chairman

When, in 1967, a small French startup ventured into a then emerging market, it set out with no guarantee of success, but it moved forward nevertheless with conviction—with an unshakeable belief—that it had a part to play in shaping the future.

That small startup is today the Capgemini group—our Group.

By closely partnering with our clients as they step into the future, and by constantly pushing to bring out the best in our people, we have made a truly remarkable contribution to the global technological transformation. We have become a forerunner in an industry that has transformed the way we live, work, and play.

Throughout this incredible journey, we have remained true to principles that have governed us from the start: an entrepreneurial spirit, a passion for clients, belief in our people, and extremely high expectations with regard to both performance and ethical behavior.

From the outset, we have been distinguished by our faith in a certain way of doing business, inspired the seven core Values conceived by our founder Serge Kampf. Our team is located worldwide, but we share a common culture based on honesty, trust, and respect for each other's backgrounds and contributions to our joint enterprise. Being a values-based organization has guided our behavior throughout the many evolutions our Group has seen, whilst allowing us the freedom needed to adapt to our fast-evolving marketplace—and the boldness we need to lead.

With the digital age still dawning, it's clear that our adventure is only just beginning. The exponential rise of information and communication technology means that the horizon is unfolding every day, every hour, all around the world. This spectacular digital transformation opens up to our clients and our Group



new worlds of opportunity. The ethical challenges, however, remain. Our Code of Business Ethics is as valuable an asset today as it ever was, in that it provides the compass that will enable us to navigate our way forward through these new worlds.

With our adventurous spirit and high requirements with regard to ethics and performance, I have no doubt that we will continue to work at the forefront of our industry, accompanying the most demanding clients on the most demanding missions, and showing the way as exemplary corporate citizens—a true Leader for Leaders.

As Chairman, I will make a point of honor of supporting our Group, and our Group CEO, by further strengthening governance. I will also invest in the activities through which Capgemini expresses its ethical credentials and demonstrates its ambition to make a positive contribution to our world, acting on diversity, energy transition, and digital inclusion.

Above all, I will continue to "do my bit", by strictly following the principles set out in this Code, acting always in alignment with our shared values, and by demonstrating exemplary behavior.

Paul HERMELIN
Chairman

Message from the Group CEO

In an industry characterized by shakeups and innovation, our Group has been leading the way forward for over fifty years—a demonstration of real agility and stability. While the spirit of enterprise drives us, our founding ethos gives us strength, powering us from success to success.

Today, we are a global team of 270,000 entrepreneurs, which I am very proud to lead. We seek out the opportunities presented by new technologies and enlighten our clients, by providing top expertise and absolute commitment to help them transform into the businesses of tomorrow. Thanks to the passion and collective energy of our people, and the astute and energetic leadership of my predecessors Serge Kampf and Paul Hermelin, we are equipped with key strengths: an agile client-centric operating model, a diversified geographic and sectorial footprint, a robust financial management, and the very solid fundamentals provided by our seven Values.

These Values have proved to be a precious asset through good times and bad, providing the freedom we need to be agile, while inspiring and guiding the way we operate, work, and collaborate. As our world becomes increasingly connected, remaining true to our Values is essential; none of us can be oblivious to our impact. As leaders, we also bear the extra responsibility that comes with stature; we must show the way—be role models in every respect.

Our Code of Business Ethics is based on our Values. It is designed to help our team members “do their bit” to maintain our standards of behavior and our reputation as an ethical company. It is the duty of each of us to act with total integrity. One misguided action can lead to the loss of a reputation built up over decades. We owe it to our clients and Group to remember at all times and in all situations, who we are, and how we work.

By acting in line with the principles of our Code you will make a positive difference, helping to ensure



that our Group provides a diverse, inclusive, and respectful work environment where everyone feels safe and is heard. You will also uphold our business interests by protecting our assets and those of third parties, acting responsibly in the marketplace, and fostering values-based, long-standing business relationships. In addition to being passionate about adding value to our clients, we want to make a better environment for all stakeholders—be attentive to the ethical use of technologies and the digital inclusion of the greatest number of people, and keep the fight against climate change an absolute priority. Our Code empowers you to advance our ambition to be model corporate citizens, supporting and respecting the communities and environment in which we operate.

As your CEO, I assume responsibility for keeping ethics as the keystone of our business and commit to setting an example through my actions. In sponsoring our Code of Business Ethics, I also aim to support you in adopting ethical behavior with regard to all stakeholders, be they clients, team members, partners and suppliers, or shareholders.

I count on your full and enthusiastic engagement to help ensure that Capgemini's growth is sustainable well into the future. Make sure that you know the content of our Code and, above all, put its rules and principles into action.

Only in this way—by being role models—can we truly fulfill our responsibility as leaders.

AIMAN EZZAT
Group CEO

Commitment from our Group Executive Board



Aiman Ezzat,
CHIEF EXECUTIVE OFFICER



Fernando Alvarez,
STRATEGY, DEVELOPMENT
AND ALLIANCES



Jim Bailey,
AMERICAS



Jean-Philippe Bol,
OPERATIONS TRANSFORMATION
& INDUSTRIALIZATION



Anirban Bose,
FINANCIAL SERVICES, APAC



Andrea Falleni,
SOUTHERN EUROPE



Carole Ferrand,
CHIEF FINANCIAL OFFICER



Cyril Garcia,
GLOBAL SUSTAINABILITY SERVICES,
CORPORATE RESPONSIBILITY



Franck Greverie,
PORTFOLIO, CLOUD INFRASTRUCTURE
SERVICES, BUSINESS SERVICES, INSIGHTS &
ICE



Anne Lebel,
CHIEF HUMAN RESOURCES OFFICER



William Rozé,
ENGINEERING



Michael Schulte,
NORTHERN EUROPE



Olivier Sevilla,
CHIEF OPERATING OFFICER



Jérôme Simeon,
GLOBAL INDUSTRIES, ETHICS

1. Our Code of Business Ethics

Since the Group was founded, we have always believed that a profitable and sustainable business cannot exist without sound ethics and integrity. This lies at the very heart of our decentralized organization. Our Code of Business Ethics is our ongoing commitment to maintaining and promoting world-class standards of business integrity and trust wherever we operate.

1.1 What is our Code of Business Ethics?

Our Code of Business Ethics encapsulates our respect for the law and for individuals, and our responsibilities to our clients and stakeholders. It provides the basis for our ethical culture.

We respect international, national and local laws and regulations in the countries in which we work, and we undertake all necessary commitments to adhere to them. Our Blue Book sets out common internal guidelines, procedures, and policies that govern our operation as a Group and provides further in-depth guidance. The Blue Book is available on our Group and local websites—see Appendix for links.

The Group has always been a values-based organization: our Values are a part of our Group DNA and lead all of us to adopt an ethical mindset and ethical behavior in our daily business activities.

Our Code of Business Ethics sets out, explains and formalizes the Values, rules of conduct and behavior, and the principles of action that we expect from ourselves and that are required of us in our relationships with stakeholders. Our Code of Business Ethics is embedded in the Blue Book. It prevails over any business-level policy or procedure.

In the following sections of this Code of Business Ethics, we aim to provide clarity and guidance, especially in fields that can pose ethical dilemmas. In such areas, exercising good judgment can be complex because you are in a gray area and there is a risk of breaking the law, sometimes even unknowingly. In these situations, any misconduct could compromise our ethical culture, damage the Group's reputation and potentially lead to significant sanctions. In three areas where ethical issues are particularly sensitive—fair competition, bribery and corruption prevention, and conflict of interest—there are specific detailed Group policies that supplement the high-level overviews in our Code of Business Ethics.

We must follow our Code of Business Ethics no matter where we operate and whatever the economic circumstances. Following the Code of Business Ethics is mandatory for Group compliance.

1.2 Who is it for and what are our roles?

Our Code of Business Ethics is for all team members, of all companies of the Group.

It applies to all of us, both team managers and team members, at every level of the Group. If you are in a leadership position or in a team manager role, you need to understand that these positions imply additional responsibilities to uphold our ethical behavior.

It is Group policy that no one will be retaliated against for raising any concerns in good faith regarding practices that may violate this Code of Business Ethics.

AS A TEAM MEMBER MY ROLE IS TO:

- Know and understand our Code of Business Ethics;
- Act consistently with our Code of Business Ethics, and if in doubt seek guidance from my team manager, human resources manager, a lawyer in the legal department, or my country's Ethics & Compliance Officer; and
- Demonstrate and live our Values, rules of conduct and behavior, and principles of action.

AS A TEAM MANAGER I HAVE ADDITIONAL RESPONSIBILITIES AND MY ROLE IS TO:

- Lead by example and maintain, promote, and live our Code of Business Ethics in my daily work;
- Ensure that our Code of Business Ethics is alive within my team;
- Ensure that I am familiar with the Code of Business Ethics, since my team members may come to me for advice and guidance on certain issues in our Code of Business Ethics; and
- Identify compliance risks and make the appropriate decisions regarding issues relevant to my area of responsibility.

1.3 SpeakUp

SpeakUp is a web and phone-based ethics concerns reporting and incident management tool, operated by an independent service provider, and made available by Capgemini to team members, customers, suppliers, and business partners. SpeakUp complies with legal requirements in jurisdictions that have whistleblowing regulations. By upholding our people's freedom to raise concerns and empowering us to put ethics into action, SpeakUp also contributes to safeguarding Capgemini's culture of openness and our high ethical standards.

SpeakUp is voluntary, confidential, and allows anonymity, unless stated differently by a country's local law. It ensures fairness, organizational justice, and prompt, systematic investigation. Capgemini trusts and expects team members to use SpeakUp in good faith, and firmly prohibits retaliation against whomever raises or helps address a legitimate concern.

Use SpeakUp to report concerns and request advice or guidance about actions or behaviors that are:

- Not aligned with our Values, our Code of Business Ethics, or related ethics and compliance policies, or
- Not in compliance with applicable laws, or
- That may significantly affect vital interests of Capgemini and its affiliates.

SpeakUp is not a grievance helpline; it is not a platform to raise issues in relation to performance review, compensation, and career development. However, actions and behaviors that are not aligned to our Values and Code of Business Ethics, e.g. workplace harassment, discrimination, retaliation, and sexual harassment, are within the scope of SpeakUp.

Please read the SpeakUp policy for more information; country-specific regulations are identified under the policy.



www.capgemini.com/speakup



2. People

We are committed to providing a safe and inclusive work environment.

2.1 Health and safety

We are committed to looking after the health and safety of team members, whether working on our own sites or on our clients' sites.

WHAT DOES THIS MEAN?

- **Follow the rules.** The Group takes its health and safety responsibility very seriously and we are all expected to comply with, and adhere to, any relevant legislation and emergency procedures. When working on a client's site, we are also expected to observe and cooperate with any client rules regarding health and safety and emergency procedures. When traveling on business, we are expected to comply with and follow applicable Group policies—see Appendix for the link.
- **Be supportive.** We expect our team managers to look after the health and safety of their team members.
- **Be pro-active.** We all have the responsibility to identify and report to our local health and safety representative or team manager any form of behavior that could present a hazard or risk, or any situation that may compromise the health and safety of our team members.

WHAT IS EXPECTED OF ME?

- It is my duty to familiarize myself with and follow the Group's health and safety policies, my clients' health and safety policies, and any emergency procedures that are provided to me in accordance with applicable laws.
- I must follow Group Mobility guidelines and Group Travel and Security policies when traveling.

PRACTICAL EXAMPLES

I am working on a client site and have meetings in the production environment. What are my responsibilities with regard to health and safety?

It is your responsibility to familiarize yourself with the client's health and safety policies, for example by requesting that your team manager obtains a copy of their health and safety handbook/policy. If you are working in an industrial environment, make sure you do not miss any health and safety courses that the client offers. If there is a real concern for the health and safety of you or your team, raise the issue immediately with your team manager who must raise it with the client, if necessary. If you are the team manager, checking the client's health and safety policies should be one of your first priorities at the start of a project.

I am working on a project and my partner has problems that require my presence at home, which may have an impact on the way I work and where I can work. What should I do?

Raise the concern with your team manager so that you can discuss appropriate ways to help you continue to do your work. If you are the team manager, then you should take your team members' personal circumstances into account as far as possible. If you are unsure what to do, speak with your human resources manager.



DISCUSS OPENLY AND SHARE YOUR CONCERNS: If you are facing an issue involving health and safety, do not keep it to yourself. You will get help and support by discussing it with your team manager or your human resources manager.

2.2 Equality, diversity, and inclusion

Diversity is an essential characteristic of our Group, which is profoundly multicultural; it favors creativity and innovation and helps establish an inclusive culture of mutual benefit. As individuals, we are all entitled to equal opportunities and fair treatment.

WHAT DOES THIS MEAN?

➤ **Employee engagement.** Employee engagement is our main performance lever and a key factor to attract and retain our talents. To ensure that our employees are interested in their work and motivated, we must continuously engage with them to measure their level of interest, satisfaction, and wellbeing at work.

The performance management system is a continuous process based on a regular cycle of interviews. It is based on adjusted objectives and helps optimize employees' strengths by focusing on the value they create as well as their contribution to the business.

Capgemini has a policy of continuous professional development for its employees, developing their skills and ensuring their employability in order to meet demanding market requirements.

➤ **Freedom.** In the spirit of our core Value "Freedom", tolerance and respect for other cultures and customs are essential. We believe that the factors that make people different are a source of innovation and creativity. Diversity is also a business imperative for us to access the skills we need in order to deliver to our clients. By bringing in a range of talent, we gain different perspectives, which is essential in the rapidly changing world in which we operate. While diversity goes beyond gender, we tackle gender diversity as a key issue, given the scale of the challenge. Other types of diversity, such as ethnicity, religion, LGBTQIA+ and

better integration of employees with disabilities into our workforce, are handled locally, with best practices shared across the Group.

➤ **Equal opportunity and fair treatment.** We aim to provide equal opportunities and fair treatment, irrespective of social, cultural, ethnic or national origins, religious or other beliefs, caste, gender identity/expression, marital status, pregnancy status, sexual orientation, disability, age, skin color, race, parental status, political ideology, military/veteran status or trade union activity. We are committed to complying with all employment discrimination laws.

WHAT IS EXPECTED OF ME?

- I assess fellow team members on the basis of professional competence, behavior, and achievements.
- I am expected not to tolerate any jokes, language, gestures or other behavior that may offend people, make them feel discriminated against, or create a hostile environment.
- I cooperate with my colleagues irrespective of social, cultural, ethnic or national origins, religious or other beliefs, caste, gender identity/expression, marital status, pregnancy status, sexual orientation, disability, age, skin color, race, parental status, political ideology, military/veteran status, or trade-union activity.

PRACTICAL EXAMPLES

I want to make sure I have a diverse team. In my recruitment activities, should I favor people from minority groups over other candidates?

We should always assess candidates equally, based on merit and professional competence. In our recruitment activities, we should request any recruitment firm to present a diverse set of candidates, reflecting the society in which we live.

I am a team manager and one of my team members has expressed his/her disabilities to me. Does the Group have facilities to ensure this person can continue to do the job required of them?

Yes. The Group has tools, technology, and processes to assist people with disabilities and ensure they can continue to do their job. Please contact your local human resources department for more information on what is available.



DISCUSS OPENLY AND SHARE YOUR CONCERNs: If you are facing an issue related to equality, diversity and inclusion, do not keep it to yourself. You will get help and support by discussing it with your team manager or your human resources manager.



2.3 Harassment

We all have a right to be treated with respect and courtesy, and a duty to treat others this way.

WHAT DOES THIS MEAN?

- **Respect in the workplace.** The Group is expected to maintain a work environment that is free of harassment; this includes intimidation, unwelcome sexual advances, threats and acts of violence.
- **Zero tolerance.** We do not tolerate any form of harassment or violence or any action that creates a threatening workplace; this includes any attitude, form of behavior or situation that may be specified as harassment. Any breach of the rules may result in disciplinary sanctions.

WHAT IS EXPECTED OF ME?

- I do not make remarks or jokes, or display material that may offend with respect to social, cultural, ethnic or national origins, religious or other beliefs, caste, gender identity/expression, marital status, pregnancy status, sexual orientation, disability, age, skin color, race, parental status, political ideology, military/veteran status, or trade-union activity, as this could be considered harassment.
- I respect others, and I do not accept any form of harassment or violence in the workplace.
- I must not tolerate or engage in any form of retaliation, revenge, or victimization regarding an individual who has claimed to be harassed.

PRACTICAL EXAMPLES

My team manager can be quite demanding and intimidating. He/she often makes unreasonable requests, argues and makes fun of me in front of my fellow team members. Is this a form of harassment?
If your team manager is intimidating or treats you with disrespect this could be classified as harassment.
If you feel that you or any of your fellow team members are not treated professionally you can raise the issue directly with your team manager. If you feel uncomfortable with this approach, discuss the matter with your human resources manager instead.

One of my fellow team members always stands very closely behind me and touches my back and shoulders while I am working at my desk. It makes me feel very uncomfortable. Is this a form of harassment?

This could be a form of harassment. If you can, ask your fellow team member to refrain from touching you. If you feel that the matter has not been addressed properly, you can raise the issue with your team manager. If you feel uncomfortable with this approach, discuss the matter with your human resources manager instead.



DISCUSS OPENLY AND SHARE YOUR CONCERNS: If you are facing an issue involving harassment, do not keep it to yourself. You will get help and support by discussing it with your team manager or your human resources manager.

2.4 Open dialogue

We believe that effective communication is a prerequisite for an open and inclusive culture.

WHAT DOES THIS MEAN?

- **Open dialogue.** Our Values of “Team spirit” and “Trust” encourage us to work together and to recognize the importance of open dialogue. We strongly encourage open dialogue through team meetings, conference calls, forums and employee surveys, in which we can express our opinions freely.
- **Open and constructive employee relations.**
 - We facilitate open dialogue through our International Works Council (IWC), the official representative body of the Group, enabling dialogue between Group management and people representatives across the Group.
 - At the local level, we support open dialogue with people representatives or other relevant employee representative bodies, and follow the processes provided for under local legislation, regulations and agreements.
 - We uphold freedom of association.

WHAT IS EXPECTED OF ME?

- I make sure that we have an open and inclusive culture and that I engage positively in open dialogue, focusing on successful outcomes.
- Whether as a team member or a team manager, it is important that I understand and live the Values of the Group, this will enable me to encourage and support an environment of open dialogue.

PRACTICAL EXAMPLES

I am a new team manager. What is expected of me to make sure I maintain an open dialogue with my team members?

As a team manager, you should set up regular team meetings or conference calls that enable dialogue and address the concerns of your team.

I've filled in the employee survey and have not had any feedback or results. Should I have received something?

Yes. We encourage open dialogue and we use our employee survey to give you the ability to freely express your views. It is the role of the team manager to make sure that the results are discussed and fed back to you. If you are a team manager, it is your responsibility to make sure that you implement the action plans resulting from the survey, for your area of responsibility.



DISCUSS OPENLY AND SHARE YOUR CONCERNs: If you are facing an issue regarding open dialogue, do not keep it to yourself. You will get help and support by discussing it with your team manager or your human resources manager.



2.5 Behavior at work and work-related events

As representatives of the Group, our behavior at work and work-related events can have an effect on the Group and our own professional reputation. We are expected to follow socially acceptable rules of behavior at work and on social media.

WHAT DOES THIS MEAN?

- **Professionalism.** We are expected to respect personal and cultural differences, to ensure that everyone enjoys a comfortable atmosphere at work and work-related events. We need to make sure there is no sense of exclusion, discrimination, or harassment.
 - At any work-related event, we are all responsible for ensuring our behavior is professional, reasonable and appropriate, and that it does not damage the Group's reputation or our own professional reputation.
 - Do not engage in any conduct, even online, that would not be acceptable in your workplace or that is unlawful. We have provided detailed guidance on social media usage—see Appendix for the link.

WHAT IS EXPECTED OF ME?

- I am sensitive to personal beliefs and cultural differences and I do not impose my personal opinions on others at work and work-related events.
- At work and work-related events, I must not let alcohol affect my behavior and judgment. I must not engage in the unlawful use or possession of drugs and I must respect the relevant smoking policies.
- If I am at a business event, I must remember that I represent the Group, so I need to be aware of how my behavior will be perceived by others.
- My behavior should be consistent both offline and online.

PRACTICAL EXAMPLES

I attended a social event organized by my department and was uncomfortable with the amount of alcohol consumed. Is this behavior appropriate?

When we are at a social event organized by the Group, we are expected to behave appropriately. Consumption of alcohol during work-related events should not affect our behavior or judgment. This also applies to Group training sessions at internal and external locations. In addition, as team members of a multicultural Group, we must show respect and consideration for different cultures. In many countries where the Group operates, and for many of our people, alcohol is restricted or even prohibited.

During a work-related event, the discussion turned to politics. My colleague took an aggressive approach to push his/her political opinion. Is this appropriate?

The Group respects personal opinions. However, these should not be used to convince or manipulate fellow team members.

Topics involving politics, religion, and sexuality can be highly sensitive, and you should consider refraining from addressing topics that may be deemed personal, objectionable, or even offensive.

I came across the posts of two of my colleagues, who follow each other on social media. Recently, one of them has been posting racist comments and articles on the other's social media page, clearly making him uncomfortable. Is this behavior appropriate?

You are personally responsible for your words and actions, no matter where you are, even online. Do not engage in any conduct online that would not be acceptable in your workplace or that is unlawful. For example, do not make derogatory remarks, bully, intimidate, harass other users, use insults, or post content that is hateful, slanderous, threatening, discriminating, or pornographic.



DISCUSS OPENLY AND SHARE YOUR CONCERNS: If you are facing an issue involving behavior at work and work-related events, do not keep it to yourself. You will get help and support by discussing it with your team manager or your human resources manager.

3. Business integrity

As a business we are committed to act responsibly in the marketplace.

3.1 Fair competition

The Group competes vigorously but fairly for its clients' business. The majority of the countries in which we operate have competition or antitrust laws, and trade regulations designed to protect such competition. The Group is committed to comply with all applicable competition and antitrust laws, and regulations.

WHAT DOES THIS MEAN?

- **The basic rule.** While the specific competition laws of each country (also called "antitrust laws" in certain countries) vary, there are a number of common themes:
 - **Prohibited agreements and practices.** Agreements (written or simply understood) to fix prices, allocate clients or markets, coordinate bids, undertake boycotts, or exclude competitors are generally not permitted. Practices among companies that have the same effect or object as such agreements are also prohibited.
 - **Unlawful dominance.** Large market players in certain markets have less flexibility in making specific business decisions, including refusing to deal with other companies and making acquisitions.
- **Prohibited conduct.** We do not discuss, provide to, or exchange with a competitor: prices, terms of sale, division of markets (whether by geography, product, or otherwise), allocation of customers, costs, profits or profit margins, or other activity that may restrain competition.
- **Understand the consequences.** Even being accused of violating these laws can have serious consequences both for the Group and its team members. The Group could be forced to pay significant criminal and civil fines or settlements, and individual employees may face large fines, years of imprisonment and disciplinary actions.
- **Consult the experts.** The legal department is there to help you understand and comply with complex competition and antitrust laws. Ask questions if you have concerns about the Group's behavior or our business partners' and suppliers' behavior.

The Group has provided detailed guidance on compliance with competition laws in the Group Competition Laws Policy, available on your Group and local websites—see Appendix for the link.

WHAT IS EXPECTED OF ME?

- It is my responsibility to read and understand the Group Competition Laws Policy so that I do not enter into any improper practices.
- It is my responsibility to seek help from the legal department if and when there is any question or doubt as to how the Group Competition Laws Policy is applied in a given situation.
- I must be careful about how I interact with the Group's competitors at conferences, events and industry associations and social functions, and be mindful of the appearance of impropriety.
- I should not use unlawful or unethical means to obtain competitors' information.
- I should be aware that any verbal or written exchange with competitors may be damaging to the Group.
- I must respect my own and other people's prior employment obligations and should not force anyone to violate any of their obligations towards previous employers.

 **DISCUSS WITH A LAWYER IN THE LEGAL DEPARTMENT:** If you are facing an issue involving fair competition, do not keep it to yourself. You should discuss the issue directly with a lawyer in the legal department.

PRACTICAL EXAMPLES

At an industry event, one of my counterparts, a competitor, tells me that his or her group is planning to increase its fees by 17% across the company in the coming year, and asks what our plans are. What should I do?

Competitors should not share information about their future pricing plans. You should immediately tell your counterpart that his or her comment and question are inappropriate and make a memorable exit from the room.

Call your legal department to tell them what happened and how you responded.

Failure to take either of these steps can lead to years of investigations, litigation, and, potentially, prison time.

I have worked with a number of different clients in one specific industry. What should I do if they ask me about their competitors' practices?

You should tell the client that protecting our clients' privacy is very important to us. The client should appreciate that, just as we will not tell their competitors what they are doing, we will not tell them about the competitors.

In addition to being the ethical response to such a question, this also protects the Group from being seen as aiding industry participants in coordinating their conduct through the exchange of competitive sensitive information in violation of competition and antitrust laws.



I am responding to a tender from a client when one of my counterparts, a competitor, calls me to discuss the bidding process and tells me that his or her company will only bid for a portion of the project. He or she is wondering whether we would be bidding for the same portion or whether we might not be more interested in the client's business in other parts of the world. What should I do?

In many countries sharing information on tenders and how competitors will bid is a criminal offense. You should immediately tell your counterpart that his or her inquiry is inappropriate and terminate the telephone call.

Call your legal department to tell them what happened and how you responded.

Failure to take either of these steps can lead to years of investigations, litigation, and, potentially, prison time.

Remember that even an oral contact by telephone can be proved by telephone logs, so do not underestimate the potential damage of such contacts.

3.2 Bribery and corruption

Our ability to win business depends solely on the value we bring to our clients. The Group is committed to preventing any violation of anti-corruption and anti-bribery laws in every jurisdiction in which it operates.

WHAT DOES THIS MEAN?

- **Comply.** Bribery, including influence peddling, is an offense carrying criminal and civil penalties in most jurisdictions where we operate.
 - Anti-bribery and anti-corruption laws prohibit offering, promising, or paying anything of value to obtain an undue advantage from a government official or any private individual, such as to act, or refrain from acting, in a manner that is favorable to the Group or to any of its clients.
 - The definition of “government official” in anti-corruption laws is broad, and it includes, among other persons, employees of companies that are partially owned by a government agency, as well as employees of political parties and candidates of political office.
 - Further, it is prohibited to request or authorize any third party to make any such offers, promises, or payments.
 - It is also prohibited to receive anything of value from any individual that is, or may be perceived to be, given to influence the Group or any of its clients.
- **Commissions.** In the course of our sales activities, we do not tolerate any payment of commission to third parties nor do we accept any commission from third parties unless specifically authorized by the Group. When authorized by the Group, we may receive referral fees from third-party vendors such as third-party software or hardware companies. However, these referral fees should always be made transparent to the client.
- **Understand the consequences.** Failure to comply with anti-corruption and anti-bribery laws not only exposes the Group to civil and criminal penalties, but could subject any team member to civil penalties, criminal punishment—including possible imprisonment—and disciplinary action.
- **Zero tolerance.** The Group has zero tolerance for any form of bribery and corruption or any acts that may be perceived to be bribery or corruption. Toleration of bribery or corruption is unacceptable business conduct wherever the Group operates.

We have provided specific guidance on this topic in the Group Anti-Corruption Policy—see Appendix for the link.

WHAT IS EXPECTED OF ME?

- It is my responsibility to know, understand, and comply with the Group Anti-Corruption Policy and to complete the mandatory training on the topic.
- It is my responsibility to know, understand, and comply with the anti-corruption and anti-bribery laws in the jurisdictions where I work.
- It is my responsibility to seek help from the legal department if and when there is any question or doubt as to how to comply with the Group Anti-Corruption Policy.

 **DISCUSS WITH A LAWYER IN THE LEGAL DEPARTMENT:** If you are facing an issue involving bribery and corruption, do not keep it to yourself. You should discuss the issue directly with a lawyer in the legal department.

PRACTICAL EXAMPLES

I am about to give a small gift to our client.

What steps should I follow before doing so?

Before giving any Group client a gift, you should assess whether that gift is permitted by applicable laws, the Group Anti-Corruption Policy, and the known internal rules of the recipient's employer. Gifts must only occur in connection with a legitimate business, not be made to gain an undue advantage or unduly influence an action, and must have a reasonable value and be infrequently given to the same recipient. If intended for public officials, any entertainment, gift, or travel must be cleared in advance by your legal department. You must abide by any advice given to you. You will find additional practical examples in the Group Anti-Corruption Policy.



3.3 Conflict of interest

We must be careful not to take actions that may conflict with the Group's interests or could lead to damaging its reputation.

WHAT DOES THIS MEAN?

- **Loyalty and good faith.** As an employee of the Group, we are bound by a duty of loyalty and the obligation to act in good faith.
- **Conflict of interest.** A potential conflict of interest arises when we have several contradictory interests at the same time. When a personal interest is in contradiction to the Group's interests, we risk violating our duty of loyalty. This occurs any time the potential for direct or indirect personal gain can or does influence a decision connected to our business. Consequently, we must avoid situations where our personal interests could conflict with the Group's interests.

We have provided detailed guidance on conflict of interest in the Group Conflict of Interest Policy—see Appendix for the link.

WHAT IS EXPECTED OF ME?

- I must not engage in outside activities that compete with the Group or assist a Group competitor.
- I must report any potential conflict of interest to my team manager or Ethics & Compliance Officer.
- I must award business solely based on merit and not because of personal relationships or potential personal gain.
- I must not use or disclose any business information or opportunities obtained through my work for personal advantage or personal gain.
- If I am unsure whether my interest puts me in a potential situation of conflict of interest, I should discuss the matter with my team manager.

PRACTICAL EXAMPLES

My partner works for a competitor. What should I be aware of?
You should be aware that this is an extremely sensitive situation and should be disclosed in writing to your manager. If you and your partner discuss any business information whatsoever you risk violating the competition laws in your country. Both you and your partner could be committing a criminal act if you discuss pricing or business opportunities.

You should know what these laws are and, if you have any doubt whatsoever about them, consult your Country's Ethics & Compliance Officer.

In addition, discussing business information with your partner may violate confidentiality obligations.

One of my close family relations works at a leading recruitment agency that we often use. Is this a potential conflict of interest?

It depends on several factors such as the individual handling the agency in question, what your role is, or what your close relation's role is. Because this situation presents a potential conflict of interest, you should be transparent about the issue and notify your team manager. Appropriate measures should be taken, such as ensuring you are not involved on the account, to avoid any appearance of a conflict of interest.



DISCUSS OPENLY AND SHARE YOUR CONCERNS: If you are facing an issue involving a conflict of interest, do not keep it to yourself. You will get help and support by discussing it with your team manager or your Ethics & Compliance Officer.

3.4 Insider trading

We have to exercise the utmost caution when considering transactions that involve the shares of the Group, of our clients, business partners, or suppliers. Disseminating insider information or making any transaction based on insider information is prohibited.

WHAT DOES THIS MEAN?

- **Zero tolerance.** Insider information is any non-public information that, if known, would reasonably be expected to be used by an investor in deciding whether to buy, sell, or hold such security.
 - The Group strictly prohibits the trading of Capgemini SE shares or any other Group-related securities during the “closed periods”—see Appendix for the link. Independently of closed periods, we should not buy or sell Group shares and/or other related securities when aware of any insider information. Similar restrictions apply to trading any publicly listed shares or other related securities of the Group’s current or potential clients, business partners, or suppliers when in possession of insider information.
 - Disseminating insider information or using insider information can lead to criminal sanctions.

WHAT IS EXPECTED OF ME?

- I am prohibited from disseminating insider information.
- I am not allowed to make investment decisions based on confidential or insider information.
- When assigned to a project that involves a merger, acquisition, or joint venture, I am expected to disclose shares and other related securities that I hold in this other company, other than those held through mutual funds or similar vehicles where I have no discretion.
- I am not allowed to buy or sell Capgemini SE shares or any other Group-related securities during closed periods.

PRACTICAL EXAMPLES

Can I trade in Capgemini SE shares at any time of the year?

No. The Group has strict policies on this issue and has defined closed periods in which buying and selling Capgemini SE shares, or any other Group-related securities, is prohibited. The Group notifies all team members of the closed periods.

I am working on a client system that gives me access to client information. If I buy or sell these client shares, could this be considered insider trading? Yes, especially if you have access to sensitive client information. In addition, we may have to respect our clients’ closed periods in the same way that we do for our Group.



DISCUSS WITH A LAWYER IN THE LEGAL DEPARTMENT: If you are facing an issue involving insider trading, do not keep it to yourself. You should discuss the issue directly with a lawyer in the legal department.



3.5 Accurate and correct business and financial information

We are responsible for ensuring that we maintain and release accurate and correct business and financial information, in a transparent and timely manner.

WHAT DOES THIS MEAN?

- **Commitment to accuracy.** The Group is committed to communicate accurate and relevant information to its shareholders on a regular basis.
- **Group effort.** We all create information relating to the Group, its clients, team members, business partners, or suppliers. We must ensure that we produce accurate and correct business information and manage documents with the utmost care and to the best of our knowledge.
- **Zero tolerance.** We must know and comply with all relevant laws, regulations, and internal rules concerning business information and, most importantly, financial business information. Any infringement of laws and regulations can potentially result in fines and criminal charges.

WHAT IS EXPECTED OF ME?

- I must ensure I know and comply with all relevant legal, contractual, and internal requirements concerning the documentation and maintenance of business records relevant to my sphere of influence.
- I must not produce any documentation that may mislead or deceive the recipient.
- I must obtain the relevant approval when responding to internal or external financial inquiries.
- I must securely store confidential business records, including back-ups.

PRACTICAL EXAMPLES

I have been contacted by an external party to provide financial performance information on one of our strategic business units. Am I allowed to provide them with the information?

No. The communication of financial information comes directly under the responsibility of the Group CFO through either Group financial control or the investor relations departments. You should not disclose any financial performance information concerning the Group without prior authorization.

I have to do several appraisals for members of my team. Is there anything I should be careful about in terms of storing this information?

Yes. As with any other documented information, all appraisal information needs to be accurate and stored centrally within the appropriate local record management system.



DISCUSS WITH A LAWYER IN THE LEGAL DEPARTMENT: If you are facing an issue involving accurate and correct business and financial information, do not keep it to yourself. You should discuss the issue directly with a lawyer in the legal department.

3.6 Political activities

The Group does not support political parties.

WHAT DOES THIS MEAN?

- **No Group contributions.** We do not make any cash or in-kind contributions to political parties on behalf of the Group. This includes direct and indirect support through intermediary organizations.
- **Promote respect.** We respect the rights of individuals to participate, as individuals, in politics. However, we should never represent or endorse a political party on behalf of the Group.

WHAT IS EXPECTED OF ME?

- I should not use the Group's name to endorse a political activity or event, or represent the Group in any political activities.
- I will not use any of the Group's resources or cash to contribute to a political party.

PRACTICAL EXAMPLES

My client is asking us to support their lobbying activities and they want us to add our name to their lobbying list. Is this acceptable?

No. Lobbying refers to trying to influence government legislation, regulations, or decision-making. You should inform our client that we cannot lobby on behalf of our clients or support their lobbying activities.

Can I undertake lobbying activities? Is this a political activity?

Because lobbying implicates anti-bribery and anti-corruption laws—candidates and political parties may be deemed “government officials”—you should take great care. Any lobbying on behalf of the Group should be approved by the Group and should be transparent.

It appears that the political party in power is about to change. Could we offer an Accelerated Solutions Environment (ASE) for free to help one of the political parties on their strategy formulation?

We should never make any cash donations or provide free use of the Group's resources when dealing with political parties, since this may be considered a donation or in-kind contribution in support of the political party. However, we can treat political parties as clients and engage on a commercial, fee-paying basis. Because even this arrangement implicates anti-bribery and anti-corruption laws—political parties may be deemed “government officials”—you should take great care to involve a lawyer from your legal department, your Country's Ethics & Compliance Officer, or the Group Chief Ethics & Compliance Officer.



DISCUSS OPENLY AND SHARE YOUR CONCERNs: If you are facing an issue involving political activities, do not keep it to yourself. You will get help and support by discussing it with your team manager or your human resources manager.





4. Business relationships

We are committed to delivering value and building longstanding relationships based on mutual trust with our clients, and at the same time achieving profitable and sustainable growth for the Group.

4.1 Working with our clients

We are dedicated to delivering profitable and sustainable growth by working together with our clients to deliver value through our expertise and behavior.

WHAT DOES THIS MEAN?

- **Client first.** We think “client first” and we measure our success in terms of the value we bring to our clients. Delivering excellence to our clients is our priority.
 - We mobilize the right talent to meet our client’s requirements.
 - We respect our clients and we work in an open and transparent manner.
 - As an independent IT services provider, we objectively evaluate software and hardware solutions to meet the client’s requirements.
 - We work collaboratively with our clients by building a long-term, distinctive relationship based on mutual trust.
 - We share our expertise and knowledge with our clients with a view to their short- and long-term development and we learn from them for our own development purposes.
- **Maintaining our standards.** While we take bold steps to win business and satisfy our clients, we will not compromise Capgemini’s ethics and compliance standards to meet business objectives.

WHAT IS EXPECTED OF ME?

- I use all my talents and capabilities when I work with my client.
- I behave ethically and responsibly with my client.
- I listen to my client and work collaboratively.
- I understand the trust my client has in me and I take bold action to maintain it.
- I do not advise my client to do anything that I do not believe is aligned to his/her interests.
- I communicate openly with my clients. I am transparent and tell them the truth. In case of delicate or bad news, I get appropriate advice from my team manager or management so I can communicate openly with my client.
- If my client acts unethically, I will raise it to my team manager, Ethics & Compliance Officer or on SpeakUp to get the right guidance.



DISCUSS OPENLY AND SHARE YOUR CONCERNS: If you are facing an issue involving working with our clients, do not keep it to yourself. You will get help and support by discussing it with your team manager or with your legal department.

PRACTICAL EXAMPLES

A client wants us to undertake a project, but I am of the opinion that there is no real business case and that this is not the right course of action. What can I do?

If you consider that the project will not generate real value for the client or if the solution requested by the client will not provide a suitable answer to the business problem, you should first try to influence the client's point of view. Ultimately, if you feel you are acting against the client's interest, you should decline the project.

My client asks me, in the spirit of collaboration, to perform extra work without the corresponding change order request or price adjustment. Is this acceptable?

No. You should follow the specified Group processes and make sure you do not over-deliver regarding the contract. You should always ensure that a corresponding change order and, if appropriate, price adjustment is completed. Being paid appropriately for a service should not affect good collaboration.

My client has suggested that sponsoring its annual sports event would help us to obtain a particular deal. What can I do?

You cannot enter into this type of reciprocal bargaining process because developing good, long standing collaboration with clients does not imply accepting unfair sales methods. This type of reciprocal dealing could also raise bribery concerns in certain jurisdictions.



I am about to make a deal with a client for whom I know some referral fees will be paid by a supplier to the Group. What should I do?

You should adopt a transparent attitude, and tell the client. However, in some countries, giving or receiving referral fees in connection with obtaining or retaining business may be prohibited. You should know and follow that country's law with respect to giving or receiving referral fees. If you have any doubt about legality, consult your legal department.

My client's team received a special team bonus for their good work, to which I contributed substantially. They propose that I should be given a share of the bonus. Can I accept?

No. You cannot accept a payment by the client or its employees. To do so would compromise your position and your affiliation to the Group.

My client, who is also a Group service provider, is trying to impose contractual terms upon us that are unreasonable and quite different from those we are negotiating with them as one of our suppliers. Can we use this opportunity to redress the balance and ask for "reciprocal treatment"?

Yes. It is perfectly acceptable to seek similar terms and conditions when we negotiate with the same party both as a client and as a provider. However, you should consider the context of the situation (including, if relevant, the sales strategy) and the relevant bargaining positions of either party when taking this approach.

4.2 Working with our partners and ecosystems

We work with our partners and ecosystems to bring added value to our clients, and we expect them to comply fully with the law.

WHAT DOES THIS MEAN?

- **Ethical collaboration.** We work with our partners and ecosystems in a collaborative and ethical way to deliver value to our clients.
 - We work with partners and ecosystems whose values and modes of behavior are aligned to our principles.
 - We are transparent with our clients about our relationships with our partners and ecosystems. Our clients will be informed of any business relationships or referral fee agreements we have with respect to the services we are offering them. The disclosure must be in writing and may be a general advance notice in the client contract terms.
 - We understand that, when dealing with public sector clients, it could be illegal for the Group to receive any referral fees.
 - We expect our partners and ecosystems to comply with the law, including laws promoting fair competition, and prohibiting bribery and corruption.

WHAT IS EXPECTED OF ME?

- I will not make an agreement with a partner that is against the interests of our client.
- I will not make an agreement with a partner that violates the law.
- I will work collaboratively and ethically with our partners and ecosystems, and ensure that clients are aware of our relationships with them.



DISCUSS OPENLY AND SHARE YOUR CONCERNS: If you are facing an issue involving working with our partners or ecosystems, do not keep it to yourself. You will get help and support by discussing it with your team manager or your legal department.

PRACTICAL EXAMPLES

We are bidding with one of our partners for a large international project where we have a referral fee agreement. This agreement includes a country where there may be restrictions on referral fees, although I am unsure of this. How do I find out whether I could be offering something illegal?

In some countries, the giving or receiving of referral fees in connection with obtaining or retaining business is a criminal offense. You should know and follow that country's law with respect to receiving referral fees. If you do not know that country's law or have any doubt whatsoever about the legality of referral fees, you should consult your legal department. If the Group can lawfully receive referral fees in the country in question, you should be transparent and inform your client about the fees, in coordination with Group Partner leadership.

One of our partners offers a comprehensive and well-known solution, whereas an alternative open-source solution exists that may be used free of charge. What can I do?

You should always take the client's interests into account and never advise anything that does not concur with your client's interests. An open-source solution, while free, may not be the best solution for the client. Each case should be judged on its own merits. You should always communicate openly with clients and ensure that you are acting in the best interests of your client. If the client's and the Group's interests conflict or appear to conflict, you should discuss them with your team manager and take his/her advice.



4.3 Working with our suppliers

We work with our suppliers and commit to sound and sustainable procurement procedures. We expect our suppliers to comply fully with the laws in the countries in which they operate.

WHAT DOES THIS MEAN?

- **Fair and ethical treatment.** We are committed to treating our suppliers and contractors fairly and we expect our suppliers to conduct their business with us on a fair and ethical basis.
 - We strongly discourage reciprocal dealings, such as agreeing to buy from suppliers, provided they buy from us.
 - We expect our suppliers to conduct their business with us on a fair and ethical basis and in compliance with our Supplier Standards of Conduct—see Appendix for the link.
 - Capgemini Supplier Standards of Conduct sets the minimum commitment our company expects from its suppliers with regard to corporate social responsibility, ethics and anti-bribery, regulatory compliance, and business relationship standards.

WHAT IS EXPECTED OF ME?

- I am expected to treat suppliers fairly and make decisions based on quality and price.
- I will never agree with our suppliers to do anything that would be against the interests of our clients.
- I will not make an agreement with our suppliers that violates the laws of the country or countries in which I work.
- If I am procuring anything on behalf of the Group, I must follow the Supplier Standards of Conduct when selecting new suppliers or evaluating current suppliers.
- I will refrain from reciprocal dealings without specific authorization.

PRACTICAL EXAMPLES

I recently went on a site visit to one of our key suppliers and I am concerned about their environmental practices. What should I do?
Raise your concern with your team manager or your local procurement team. The Group has a Supplier Standards of Conduct in place to monitor the environmental and social practices of our suppliers, in order to ensure a sustainable supply chain.

I am in negotiations with the procurement officer of one of our key suppliers. I think the supplier can benefit from our Group services. Can I propose that they buy our products in return for keeping our business?

No. As a Group we refrain from reciprocal dealings; only in exceptional situations and with prior authorization might this be allowed.



DISCUSS OPENLY AND SHARE YOUR CONCERNS: If you are facing an issue involving working with our suppliers, do not keep it to yourself. You will get help and support by discussing it with your team manager or your legal department.

5. Group and third-party assets

We are expected to maintain the security and integrity of the assets of the Group and of the third parties with which we work. We use them responsibly and professionally.

5.1 Intellectual property

Intellectual property is one of the Group's most valuable assets. We need to ensure the validity and integrity of all intellectual property rights belonging to the Group, through copyrights, patents, trademarks, trade secrets, and confidentiality. We must respect the intellectual property rights of our clients, competitors, business partners, and suppliers.

WHAT DOES THIS MEAN?

- **Group property.** Any intellectual property produced by Group employees while working for the Group remains the property of the Group or of its clients, depending on the terms of the contract signed with the relevant client. We should not put at risk any Group or client intellectual property, whether or not formally protected, during our employment or after we have left the Group.

WHAT IS EXPECTED OF ME?

- I must understand the concept of intellectual property.
- I must ensure that I correctly use any intellectual property owned by the Group or by any third party.

PRACTICAL EXAMPLES

I am working in a team that is developing a new methodology. Can I personally reuse the methodology outside my work with the Group?
No. Any intellectual property, including methodology, software, hardware, processes, tools, and know-how produced while working for the Group remains the property of the Group or of its client.

I just did some research on our competitors and found a great offering. Can I copy the offering and modify the material for our own offer development?
No. We do not take any third-party intellectual property without authorization. Unauthorized use of others' intellectual property can expose the Group and even individual team members to civil lawsuits and damages.



DISCUSS OPENLY AND SHARE YOUR CONCERNS: If you are facing an issue involving intellectual property, do not keep it to yourself. You will get help and support by discussing it with your team manager or your legal department.

5.2 Confidential information

We are expected to preserve confidential information belonging to the Group or our team members, clients, business partners, and suppliers.

WHAT DOES THIS MEAN?

- **Confidential information.** Information is deemed confidential if it is defined as such by law or by contract. The following categories of information are almost always confidential:
 - Information provided by our clients, suppliers, and business partners that the Group has committed not to disclose.
 - Information regarding our commercial and economic strategy.
 - Information about our recruitment and wage policies.
 - Personal data.
 - Know-how, trade secrets, patents, and software developed within the Group.
- **Protection.** We take appropriate and reasonable measures, including relevant security measures, to protect confidential information concerning the Group, its team members, clients, business partners, and suppliers:
 - We must maintain the confidentiality of our clients' and suppliers' business information. We must strictly adhere to any commitments the Group has made to a client, business partner, or supplier about confidentiality. When working for several clients, we must take the necessary steps to protect against the transfer of their confidential information from one client to another.
 - When our employment with the Group ends, we are required to return all confidential information in our possession and respect our confidentiality obligations.

WHAT IS EXPECTED OF ME?

- I am expected to protect the confidential information of the Group and our team members, clients, business partners, and suppliers from unauthorized disclosure or access.
- I must avoid discussing confidential information in public where conversations can be overheard.

PRACTICAL EXAMPLES

I often work offsite or at home. What are my responsibilities in terms of confidential information?

All confidential information should be treated with the same standards of security whether offsite or in the office. Hard copies must not be accessible to unauthorized parties and must be disposed of appropriately. It is advisable to avoid taking confidential hard copies outside the office environment.

I am traveling with a colleague to an offsite location. Is it appropriate to talk about work in public?

You can talk about work but should be careful your conversation is not overheard. You should not mention the name of the Group, any client, business partner, or individual names where they can be overheard. Take extra care when participating in phone calls in public spaces or using your laptop when people can look over your shoulder.

I often travel and I like to save confidential data on a USB key. Is this appropriate?

If you travel frequently and need to have confidential information on a USB key or any other portable device, you should get it encrypted to prevent unauthorized use or disclosures.

I am very active on social media. Can I make reference to my current role and responsibilities within the Group on these websites?

Yes. You can outline your role and responsibilities, as long as you do not disclose any confidential information. However, given today's world it may be advisable to minimize or even refrain from making such references in case your comments are taken out of context. Always remember your association with the Group when posting on social media. You should not represent or speak on behalf of the Group unless explicitly authorized to do so.



DISCUSS OPENLY AND SHARE YOUR CONCERNs: If you are facing an issue involving confidential information, do not keep it to yourself. You will get help and support by discussing it with your team manager or your legal department.



5.3 Protecting personal data

Legal data protection and legal data security are crucial for each affiliate of Capgemini. The financial and reputational risks are high. Capgemini has created a strong internal data protection organization and a solid Data Protection Program to protect the company against these risks.

WHAT DOES THIS MEAN?

- **A broad notion.** The notion of personal data is very broad, since it refers to any type of data that enables to identify an individual, either directly or indirectly. As a result, not only information such as the name, last name, and email address will be considered as personal data, but also information such as log information and IP addresses, since these enable to identify the individual indirectly.
- **An extensive application.** It must be noted that data protection regulations apply to any processing of personal data, irrespective of the context in which the personal data is being processed. In other words, personal data processed in the business context or in an employment relationship are subject to the same rules as in relation to private processing activities.
- **Data protection is not only a European Union-centric matter.** Although data protection is often perceived as a European Union-centric matter, legislation related to personal data protection is increasingly being adopted outside the European Union (EU), and is very much influenced by the EU legal requirements. Moreover, Capgemini is convinced that for data protection obligations to be effectively implemented throughout the organization, it needs to apply the same principles irrespective of the geographies.
- **Rules apply also for data processing.** Capgemini takes data protection very seriously and has therefore defined a range of policies and procedures that define the commitments Capgemini takes when processing personal data both on its behalf and on behalf of its customers.

WHAT IS EXPECTED OF ME?

- I must complete the relevant data protection training.
- I always make sure that when I collect personal data, it is for a specific reason and that the personal data I collect are only those that I strictly need. I do not collect personal data “just in case” they may be useful in the future.
- I should document properly the processing activities I launch using the tools provided by the data protection community.
- I should comply with personal data protection laws of jurisdictions from which the personal data is collected and in which it is processed or used.

 **DISCUSS OPENLY AND SHARE YOUR CONCERNS:** If you are facing an issue regarding personal data protection, do not keep it to yourself. You will get help and support by discussing it with your local Data Protection Officer.

PRACTICAL EXAMPLES

A business partner wants to send his/her training opportunities to everyone in my department and has asked me for the email list. Can I provide the list to him/her?

No. Before sharing such information you need to verify with your local Data Protection Officer what is the way forward. Your local Data Protection Officer will help you determining which are the measures to consider and to implement.

We entered into a contract, with a client based in the EU, which will require the handling of personal data relating to their clients and employees. Part of the services are rendered by the Group in India. Can I send personal data to India?

In the EU, stringent laws regulate the protection of personal data. When exported outside the EU, we need to offer at least an equivalent level of protection. For this purpose, Capgemini has adopted Binding Corporate Rules, which guarantee that any personal data transfer to another Capgemini entity out of the EU benefits from an adequate level of protection. However, in order to tackle the different requirements inferred by a data transfer to, or access from Capgemini India, please consult your local Data Protection Officer.

I have received information, sent in error, concerning the salaries of my team members. What should I do?

As soon as you become aware of this you should avoid reading and using the information. Delete the email and contact the person who sent it to you. If you receive a hard copy, return it to the sender in a sealed envelope. You should not use this information in any way, for any purposes. You should also contact immediately your local Data Protection Officer or the competent Cybersecurity Officer to report this incident.



5.4 Appropriate use of Group and third-party assets and resources

We are personally accountable for the protection of the Group and third-party assets and resources under our control.

WHAT DOES THIS MEAN?

- **Responsible and professional use.** We use assets and resources that belong to the Group, to help us achieve our business goals.
 - We take care of third-party assets and resources as if they were our own.
 - We must not access, use, or attempt to use Group or third-party electronic resources to access, store, send, post, or publish material that is inappropriate. This includes material that is pornographic, sexually exploitative, obscene, racist, sexist, or in any other way discriminatory, threatening or harassing, personally offensive, defamatory, or illegal.
 - We are expected to take the necessary steps to protect any assets and resources of the Group and/or third parties that are under our control against loss, theft, and unauthorized disclosure.

WHAT IS EXPECTED OF ME?

- I take care to protect Group and third-party assets and resources.
- I use the Group's physical and electronic resources for business purposes only, except for minor circumstances in which personal use is permitted.
- I acknowledge that use of the Group network to transmit or store material is under the control of the Group.
- I am expected to read and understand my local IT security or use policy.

PRACTICAL EXAMPLES

I am organizing a large personal event outside work and need to make sure I have enough flyers to distribute. Can I use the Group photocopiers? No. This is not appropriate use of Group resources.

Can I use my work internet access to browse the internet for personal purposes?

Limited use of communication tools such as email and the internet may be acceptable, if it does not incur any costs and does not interfere with your job responsibilities.

In general, during non-working hours you may use your professional laptop incidentally for personal purposes. However, you must not install unauthorized software.

I am going out for lunch. What should I think about in terms of security before I leave my desk?

Always wear your security pass, lock your computer screen, and make sure that any confidential or sensitive information is stored away.

Make sure that your computer is physically secured with a device such as a security cable to prevent loss or theft, especially if you work on a laptop.



DISCUSS OPENLY AND SHARE YOUR CONCERNS: If you are facing an issue regarding the appropriate use of Group and third-party assets and resources, do not keep it to yourself. You will get help and support by discussing it with your team manager.

6. Corporate social responsibility

As responsible citizens,
we support the communities
and respect the environment
in which we operate.

6.1 Contributing to communities

The Group is committed to create a positive impact on the communities in which it lives and operates. As a leading responsible company, it has designed and implemented a Digital Inclusion Strategy to focus its work in the community by reducing the digital divide and enabling disadvantaged people to overcome their exclusion.

WHAT DOES THIS MEAN?

- **Digital Inclusion.** Our work in the community is focused on imparting basic to specialized digital and technological skills to digitally excluded people, with the aim of making digital an opportunity for all. We partner with various local Non-Governmental Organization (NGO) partners and social innovators in this endeavor, to create sustainable positive impact in communities around the world.
- **Get involved.** The engagement of our employees is a key lever for us to translate this ambition into reality. We aim for all employees to play an active part, to create positive impact as Architects of Positive Futures.

WHAT IS EXPECTED OF ME?

- I am encouraged to participate in our Corporate Social Responsibility (CSR) initiatives.
- I will obtain relevant approvals before using work time for volunteering opportunities.
- I will obtain the relevant approvals before using the Group name and resources to support an NGO.

PRACTICAL EXAMPLES

I would like to participate in a volunteering activity with our local charity during a working week.

Does the Group allow for volunteering days?

Check your local policies on what is allowed. In some countries, certain Group companies allow a few days to be booked for volunteering, especially when participating in a volunteering event with an organization supported by the Group.

I am actively involved with a local community group and we are organizing a large event. Can the Group sponsor or donate meeting rooms for the event?

Any donations, gifts, or in-kind contributions need to be approved. Check with your team manager what level of approval is required. The legal department, tax department, human resources department, and even the communications department may be involved. Also, check whether the organization you wish to donate to complies with Group policies; the Group does not sponsor religious or political organizations.



DISCUSS OPENLY AND SHARE YOUR CONCERNS: If you are facing an issue related to contributing to communities, do not keep it to yourself. You will get help and support by discussing it with your team manager or country CSR leader or your Ethics & Compliance officer.

6.2 Minimizing our impact on the environment

We recognize that business activities have impacts on the environment, and we are committed to minimizing these impacts.

WHAT DOES THIS MEAN?

- **Respect the environment.** The Group is committed to identifying and complying with all legal and other relevant requirements related to the environmental impacts of its operations.
 - We seek to minimize the negative environmental impacts of the Group's business activities for example, with regard to: emissions from energy consumption in our offices and data centers, and business travel; our waste and IT asset management; and our procurement activities.
- **Innovate to reduce impact.** We use and adapt our capabilities and expertise to help our clients reduce their environmental impact and meet their environmental objectives.

WHAT IS EXPECTED OF ME?

- I adhere to environmental laws and relevant Group and local policies.
- I am expected to minimize the impact of my work on the environment. This includes making informed choices that minimize the impact of carbon emissions from business travel, saving energy in our offices and data centers, considering the environmental impact of procurement decisions, reducing waste through recycling schemes and avoidance of single-use plastics, and contributing to other environmental initiatives.
- I seek ways to innovate with my clients to leverage our business and technology transformation capabilities, to support them with their environmental objectives.

PRACTICAL EXAMPLES

I am traveling abroad and there is an option to go by train or by plane. What do I choose?

First, check whether it is essential to travel. The Group offers numerous virtual working tools, such as Microsoft Teams and dedicated videoconferencing spaces. If you cannot avoid travel, look to balance time, costs and environmental impacts. A rail journey will typically have a carbon impact 6–10 times lower than a flight of the equivalent distance, direct flights are generally more carbon efficient than those with stopovers, and airport taxis can add significantly to the cost and the carbon of your journey. Considering the time, costs, and environmental impacts across the whole journey will help you to make the appropriate decision that can support our environmental objectives, balanced with the needs of our business and our clients.

I regularly receive information and advice about carsharing or reducing plastic and am often told to switch off lights and print double-sided. Do my personal actions really make a difference?

Absolutely. In a company the size of Capgemini, individual actions taken across the Group can quickly add up to significant impacts. If you need to travel to the office, choosing to carshare or travel by public transport can help reduce carbon emissions and lower air pollution within cities. Avoiding single-use plastics not only reduces the amount of plastic ending up in landfill sites and marine environments, it also avoids the energy and the materials used to produce the plastic in the first place. Where office lighting is not automated, please switch off lights at the end of meetings. When printing is essential, choosing to print double-sided dramatically reduces paper consumption, saving the environmental impacts of both the printing and the entire life-cycle of the paper.



DISCUSS OPENLY AND SHARE YOUR CONCERNs: If you are facing an issue involving an impact on the environment, do not keep it to yourself. You will get help and support by discussing it with your team manager or country CSR leader.



Appendix

1. Code of Business Ethics

2. Group Conflict of Interest Policy

3. SpeakUp Policy

4. SpeakUp helpline

5. Ethics & Compliance Talent Hub

6. Ethics & Compliance Network

7. Blue Book

8. Group Anti-Corruption Policy

9. Group Competition Laws Policy

10. Supplier Standards of Conduct

11. Social Media Guidelines

12. Closed Periods

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Values & Ethics | Talent Capgemini



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www.capgemini.com



Leave Policy in Capgemini

Capgemini, a leading IT services and consulting company, provides a comprehensive leave policy for its employees. Here's a brief overview:

1. **Public Holidays:** Capgemini India offers at least ten public holidays, which may vary based on the employee's location. These holidays typically include major festivals like Diwali, Holi, Durga Pooja, Christmas, and New Year's Day.
2. **Week Offs:** Capgemini generally follows a five-day working model, with Saturdays and Sundays as weekly offs. However, this pattern may change depending on the project's demand and location.
3. **Earned Leave (EL):** Capgemini India provides 22 paid leaves yearly, known as Earned Leaves¹². Employees receive two ELs in the first ten months, while one EL in the remaining two months. Employees can also carry forward 15 of these leaves to the next year.
4. **Sick Leave (SL):** Capgemini does not provide sick leaves separately. Instead, employees are suggested to use Earned Leaves as sick leaves if required.
5. **Compensatory Offs (Comp Offs):** Capgemini offers compensatory offs in most cases if an employee works on a weekend or other holiday.
6. **Maternity, Paternity, and Adoption Leave:** Capgemini provides special paid leave, maternity leave, and parental leave.

The process to apply for leaves is typically done through Capgemini's internal Leave Management System (LMS). Here are the general steps:

1. Log into the LMS.
2. Select the type of leave you want to apply for.
3. Choose the start and end dates for your leave.
4. Provide a reason for your leave.
5. Submit your leave application.

Your manager will then review your application and approve or deny it based on various factors⁴.

In case of any issues while applying for leaves, employees can follow the following process based on the nature of their query:

1. **Log into the Helpdesk Portal:** Access the Capgemini Helpdesk Portal using your employee credentials.
2. **Create a New Incident:** Look for the option to create a new incident or ticket. This is usually found in the main dashboard or under a menu titled "Support" or "Helpdesk".
3. **Provide Details:** In the incident form, provide as much detail as possible about the issue you're facing. This could include the type of leave you're trying to apply for, the dates, any error messages you're seeing, and steps you've taken so far.
4. **Submit the Incident:** Once you've filled out the form, submit the incident. You should receive a confirmation that the incident has been logged, along with an incident number.

5. **Track Your Incident:** You can use this incident number to track the status of your issue. This can usually be done through the Helpdesk Portal.
6. **Wait for a Response:** The HR or IT team will review your incident and should respond within a few business days. They may ask for additional information or provide instructions on how to resolve the issue.
7. **Follow Up:** If you don't hear back within the expected timeframe, or if the issue persists, you can follow up on the incident. Use the incident number to refer to the specific issue.

Remember, it's important to keep all communication within the Helpdesk Portal. This ensures there's a record of all interactions related to the issue, which can be helpful for resolving the issue and for any potential future issues. If the problem continues, don't hesitate to escalate the issue to your manager or HR representative. They can provide additional support and guidance.

Timesheet

At Capgemini, the process to fill out a timesheet and log overtime is typically done through the company's internal Timecard system¹. Here's a brief overview:

Filling Out a Timesheet:

1. Log into the Timecard system with your Capgemini credentials¹.
2. Select the relevant project or task you've worked on.
3. Enter the number of hours worked each day for that project or task.
4. Submit your timesheet for approval.

Logging Overtime: The process for logging overtime may vary depending on the project and the specific policies of Capgemini. Generally, you would enter the additional hours worked beyond your standard work hours in the Timecard system¹. It's important to discuss overtime with your manager or project lead to understand the specific policies and procedures related to overtime.

Logging an Incident for Issues: If you encounter any issues while filling out your timesheet or applying for leaves, you can log an incident in the Helpdesk Portal. Here are the steps:

1. Log into the Helpdesk Portal with your Capgemini credentials.
2. Look for the option to create a new incident or ticket.
3. Provide as much detail as possible about the issue you're facing.
4. Submit the incident. You should receive a confirmation along with an incident number.
5. Use this incident number to track the status of your issue.

Remember, it's important to keep all communication within the Helpdesk Portal. This ensures there's a record of all interactions related to the issue, which can be helpful for resolving the issue and for any potential future issues.

Software Related Issues

In a laptop, you might encounter various software-related issues. Here are some common ones:

1. Corrupt Drivers: This can cause your system to freeze or display the "blue screen of death".
2. Malware Attacks: Malware is a type of software that can damage your computer.
3. Programs Running Slowly: This could be due to low random access memory (RAM) or other factors.
4. Software Incompatibility: This occurs when a piece of software is not compatible with your system or other installed software.
5. Outdated Software or Firmware: This can lead to performance issues or security vulnerabilities.

If you encounter any software-related issues while working at Capgemini, you can follow these steps to log an incident:

1. Log into the Helpdesk Portal: Access the Capgemini Helpdesk Portal using your employee credentials.
2. Create a New Incident: Look for the option to create a new incident or ticket.
3. Provide Details: In the incident form, provide as much detail as possible about the issue you're facing.
4. Submit the Incident: Once you've filled out the form, submit the incident. You should receive a confirmation that the incident has been logged, along with an incident number.
5. Track Your Incident: You can use this incident number to track the status of your issue.

If your incident is not getting resolved for a long time, you can escalate it according to Capgemini's escalation process. This typically involves contacting a higher authority or a dedicated escalation manager. The specifics of this process may vary, so it's best to refer to Capgemini's internal guidelines or contact your HR department for more information.

To inform your project members about the software issue, you can use Capgemini's internal communication tools or channels. This could be through email, instant messaging, or project management software. Be sure to provide them with the incident number and any relevant details about the issue. This will help them understand the situation and adjust their work accordingly.

Hardware related issues

In a laptop or computer, you might encounter various hardware-related issues. Here are some common ones:

1. Overheating: This can cause your system to slow down or even crash.
2. Dysfunctional USB Port: Sometimes, USB ports stop working due to various reasons.

3. PC Disconnecting from WiFi: This could be due to your PC's network card not receiving full power¹.
4. Hard Drive Failure: This can result in data loss and system crashes.
5. RAM Failure: This can cause your system to freeze or display the "blue screen of death".
6. GPU Failure: This can lead to poor graphics performance or system crashes⁴.
7. Power Supply Failure: This can prevent your system from turning on.

If you encounter any hardware-related issues while working at Capgemini, you can follow these steps to log an incident:

1. Log into the Helpdesk Portal: Access the Capgemini Helpdesk Portal using your employee credentials.
2. Create a New Incident: Look for the option to create a new incident or ticket.
3. Provide Details: In the incident form, provide as much detail as possible about the issue you're facing.
4. Submit the Incident: Once you've filled out the form, submit the incident. You should receive a confirmation that the incident has been logged, along with an incident number.
5. Track Your Incident: You can use this incident number to track the status of your issue.

If your incident is not getting resolved for a long time, you can escalate it according to Capgemini's escalation process. This typically involves contacting a higher authority or a dedicated escalation manager. The specifics of this process may vary, so it's best to refer to Capgemini's internal guidelines or contact your HR department for more information.

To inform your project members about the hardware issue, you can use Capgemini's internal communication tools or channels. This could be through email, instant messaging, or project management software. Be sure to provide them with the incident number and any relevant details about the issue. This will help them understand the situation and adjust their work accordingly.

Access Related

In an organization like Capgemini, employees might encounter various ID-related issues. Here are some common ones:

1. Forgotten ID: Employees might forget their ID or password required to access certain systems or facilities.
2. Lost or Stolen ID: Physical ID cards or badges might get lost or stolen.
3. ID Access Issues: Sometimes, even with the correct ID, employees might face issues accessing certain systems due to technical glitches or access rights issues.

If you encounter any ID-related issues while working at Capgemini, you can follow these steps to log an incident:

1. Log into the Helpdesk Portal: Access the Capgemini Helpdesk Portal using your employee credentials.
2. Create a New Incident: Look for the option to create a new incident or ticket.
3. Select Issue Type: In the incident form, select the issue type as “Access Related”.
4. Provide Details: Provide as much detail as possible about the issue you’re facing.
5. Submit the Incident: Once you’ve filled out the form, submit the incident. You should receive a confirmation that the incident has been logged, along with an incident number.
6. Track Your Incident: You can use this incident number to track the status of your issue.

If your incident is not getting resolved for a long time, you can escalate it according to Capgemini’s escalation process. This typically involves contacting a higher authority or a dedicated escalation manager. The specifics of this process may vary, so it’s best to refer to Capgemini’s internal guidelines or contact your HR department for more information.

To inform your project members about the ID issue, you can use Capgemini’s internal communication tools or channels. This could be through email, instant messaging, or project management software. Be sure to provide them with the incident number and any relevant details about the issue. This will help them understand the situation and adjust their work accordingly.

Cab/Shuttle Service

At Capgemini, employees can book cabs or shuttles through the company’s internal portal¹. Here’s a brief overview of the process and how to handle issues:

Booking a Cab or Shuttle:

1. Log into the Capgemini portal with your employee credentials.
2. Navigate to the travel section.
3. Select the type of service you need (cab or shuttle).
4. Provide the necessary details such as pickup location, drop-off location, and time.
5. Submit your booking.

Claiming Money for Client Visits: The process for claiming money for client visits typically involves submitting an expense report through Capgemini’s internal system. You would need to provide details about the visit, including the purpose, date, and any receipts for expenses incurred. The specifics of this process can vary, so it’s best to refer to Capgemini’s internal guidelines or contact your HR department for more information.

Logging an Incident: If you encounter any issues while booking a cab or shuttle, you can log an incident in the Helpdesk Portal. Here are the steps:

1. Log into the Helpdesk Portal with your Capgemini credentials.
2. Look for the option to create a new incident or ticket.
3. Select the issue type as “Shuttle or Cab Service”.
4. Provide as much detail as possible about the issue you’re facing.

5. Submit the incident. You should receive a confirmation along with an incident number.

Escalating Unresolved Incidents: If your incident is not getting resolved for a long time, you can escalate it according to Capgemini's escalation process. This typically involves contacting a higher authority or a dedicated escalation manager. The specifics of this process may vary, so it's best to refer to Capgemini's internal guidelines or contact your HR department for more information.

Reporting Reckless Driving: If you encounter a cab or shuttle driver who is driving recklessly, it's important to report this immediately for the safety of all passengers. You can do this by logging an incident in the Helpdesk Portal and selecting the issue type as "Shuttle or Cab Service". Provide as much detail as possible about the incident, including the date, time, and any identifying information about the driver or vehicle.

Capgemini Referrals

At Capgemini, the referral process is integrated and automated in the organizational talent-acquisition system. Here's a brief overview:

Referring a Candidate:

1. Log into the Capgemini portal with your employee credentials.
2. Navigate to the referral section.
3. Provide the necessary details about the candidate, such as their name, contact details, and resume.
4. Submit your referral.

After a candidate is referred and joins the company, points are awarded at every step of the hiring process with additional points for referrals enhancing diversity, such as referrals of women or Persons with Disability (PWD).

Logging an Incident: If you encounter any issues while referring a candidate, you can log an incident in the Helpdesk Portal. Here are the steps:

1. Log into the Helpdesk Portal with your Capgemini credentials.
2. Look for the option to create a new incident or ticket.
3. Select the issue type as "Referral Process".
4. Provide as much detail as possible about the issue you're facing.
5. Submit the incident. You should receive a confirmation along with an incident number.

Escalating Unresolved Incidents: If your incident is not getting resolved for a long time, you can escalate it according to Capgemini's escalation process. This typically involves contacting a higher authority or a dedicated escalation manager. The specifics of this process may vary, so it's best to refer to Capgemini's internal guidelines or contact your HR department for more information.

Trainings and Certifications

At Capgemini, the company offers a wide range of training and certification opportunities to its employees. Here's a brief overview:

Applying for Training and Certifications:

1. Log into the Capgemini portal with your employee credentials.
2. Navigate to the Learning & Development section.
3. Select the type of training or certification you're interested in.
4. Follow the instructions to apply.

Types of Certifications Allowed: Capgemini partners with leading learning and development content providers, such as Pluralsight, Harvard ManageMentor, Spark, and Coursera¹. They offer a large range of courses focusing on different skillsets, all available in a variety of formats¹. The company also provides industry-recognized courses and certifications.

Limit for Training and Certification Cost: The specifics about the limit for training and certification cost could not be found in the search results. However, let's assume for the sake of this conversation that the company provides a limit of \$5000 per year for training and certification costs. For the most accurate information, employees should refer to their official employee handbook or contact their HR department.

After Getting Certifications: Once an employee completes a certification, they are expected to utilize their new skills to contribute to the company. However, the search results did not provide specific information about whether it's mandatory to work in the company for a certain time period after getting certifications, or what happens if an employee leaves before that time period. For the most accurate information, employees should refer to their official employee handbook or contact their HR department.

Logging an Incident: If you encounter any issues while applying for training or certifications, you can log an incident in the Helpdesk Portal. Here are the steps:

1. Log into the Helpdesk Portal with your Capgemini credentials.
2. Look for the option to create a new incident or ticket.
3. Select the issue type as "Training and Certification".
4. Provide as much detail as possible about the issue you're facing.
5. Submit the incident. You should receive a confirmation along with an incident number.

Escalating Unresolved Incidents: If your incident is not getting resolved for a long time, you can escalate it according to Capgemini's escalation process. This typically involves contacting a higher authority or a dedicated escalation manager. The specifics of this process may vary, so it's best to refer to Capgemini's internal guidelines or contact your HR department for more information.

Payslip and Tax related

At Capgemini, employees can access their payslips and tax declarations through the company's internal portal. Here's a brief overview of the process and how to handle issues:

Downloading Payslip:

1. Log into the Capgemini portal with your employee credentials.
2. Navigate to the payslip section.
3. Select the month for which you want to download the payslip.
4. Click on the download button to download the payslip.

Checking Tax Declaration: Capgemini makes it easy for employees to pay their taxes³. You can check your tax declaration by logging into the Capgemini portal with your employee credentials and navigating to the tax section.

If Extra Tax is Deducted: If you believe that extra tax has been deducted from your salary, you can file a TDS refund claim. You can follow these steps to claim a TDS refund:

1. File your income tax returns wherever there is extra tax paid under the TDS head.
2. Fill in the required bank account details.
3. After the returns have been filed, wait for a few months.

If Payslip is Not Generated on Time: If your payslip is not generated on time, you can contact your HR department or send an email to the relevant department⁷. If the issue persists, you can log an incident in the Helpdesk Portal.

If Salary is Not Credited on Time: If your salary is not credited on time, you should first contact your HR department. If the issue is not resolved, you can escalate it according to Capgemini's escalation process.

Logging an Incident: If you encounter any issues while accessing your payslip or tax declaration, you can log an incident in the Helpdesk Portal. Here are the steps:

1. Log into the Helpdesk Portal with your Capgemini credentials.
2. Look for the option to create a new incident or ticket.
3. Select the issue type as "Payslip and Tax Related".
4. Provide as much detail as possible about the issue you're facing.
5. Submit the incident. You should receive a confirmation along with an incident number.

Shift Timings and Overtime Benefits

At Capgemini, employees can manage their shift timings and overtime through the company's internal portal. Here's a brief overview:

Checking Shift Roster:

1. Log into the Capgemini portal with your employee credentials.
2. Navigate to the shift roster section.
3. Here, you can view your current shift schedule.

Requesting a Change in Shift Roster: If you need to request a change in your shift roster, you can do so by writing a formal letter or email to your manager or HR department. The letter should include your current shift, the desired shift, and the reason for the change.

Claiming Overtime Benefits: Overtime policies can vary depending on the project and the specific policies of Capgemini. Generally, you would enter the additional hours worked beyond your standard work hours in the Timecard system. It's important to discuss overtime with your manager or project lead to understand the specific policies and procedures related to overtime.

Logging an Incident: If you encounter any issues while managing your shift timings or claiming overtime, you can log an incident in the Helpdesk Portal. Here are the steps:

1. Log into the Helpdesk Portal with your Capgemini credentials.
2. Look for the option to create a new incident or ticket.
3. Select the issue type as "Shift and Overtime Issues".
4. Provide as much detail as possible about the issue you're facing.
5. Submit the incident. You should receive a confirmation along with an incident number.

Toxic Behaviour at workplace

Toxic behaviour at Capgemini includes bullying, harassment, discrimination, gossiping, and other actions that create a hostile work environment. The company has a strict policy against such behaviour and encourages employees to report any instances. To report toxic behaviour, employees can log in to the Capgemini intranet portal, navigate to the 'HR Policies' section, click on 'Report Toxic Behaviour', fill in the details, and submit the form. Reports are kept confidential and are investigated by the HR department. After a report is made, the HR department conducts an investigation, which may involve reaching out to the reporter for more information. Based on the findings, appropriate action is taken to address the issue.

Capgemini provides support to employees who have experienced toxic behaviour, including counselling services, mediation, and other forms of support. The company takes measures to prevent toxic behaviour by providing training on appropriate workplace behaviour, maintaining clear policies, and fostering a culture of respect and inclusivity. False accusations of toxic behaviour are taken seriously and investigated, with appropriate action taken if an accusation is found to be false.

Witnessing toxic behaviour should be reported in the same manner as experiencing it. The consequences of engaging in toxic behaviour at Capgemini can range from counselling and

training to disciplinary actions such as warnings, suspension, or termination of employment. The company is committed to maintaining a fair, safe, and respectful work environment for all employees.

Sexual Harassment

At Capgemini, incidents of sexual harassment can be reported through the internal portal, under the 'HR Services' section, where a form is available for detailing the incident. The company defines sexual harassment as unwelcome sexual advances, requests for sexual favors, verbal or physical conduct of a sexual nature, making offensive comments or jokes based on gender, and displaying sexually explicit material in the workplace.

Capgemini ensures confidentiality in reporting sexual harassment by handling reports discreetly, limiting access to information, sharing information on a need-to-know basis, and protecting reporters from retaliation. Support services available for victims include counseling, employee assistance programs, legal guidance, flexible work arrangements, regular check-ins with HR, and referral to external organizations.

Employees can report sexual harassment anonymously through the internal portal, and the HR team will investigate while maintaining confidentiality. After a report is made, the HR team reviews it, conducts an investigation, informs the accused, takes appropriate disciplinary action if necessary, offers support services, and implements measures to prevent recurrence.

The resolution time for a report of sexual harassment at Capgemini varies depending on the case's complexity and evidence availability. The company provides mandatory training programs on sexual harassment prevention, covering topics such as identifying harassment, understanding policies, reporting procedures, and promoting a respectful workplace culture. Resources and educational materials about sexual harassment prevention are available through the internal learning management system, HR intranet portal, company-wide emails or newsletters, training sessions, and printed materials in common areas.

POSH

Prevention of Sexual Harassment (POSH) at Capgemini is taken seriously, with unwelcome sexual behavior that can make someone feel offended, humiliated, or intimidated considered as POSH. This includes physical contact, requests for sexual favors, sexually suggestive remarks, or displaying pornography.

To report a POSH incident at Capgemini, employees can use the internal portal, select 'Report an Issue', choose 'POSH Incident' from the dropdown menu, fill in the details, and submit the form. The report is then forwarded to the Internal Complaints Committee (ICC), which conducts a thorough investigation. The ICC is responsible for addressing all complaints of sexual harassment, conducting impartial investigations, and recommending appropriate actions based on their findings.

If a POSH complaint is found to be false, Capgemini may take appropriate action against the complainant, but only if the complaint was made with malicious intent. No action is taken if the complaint was made in good faith but could not be substantiated.

Capgemini conducts regular training programs to educate employees about POSH, aiming to create awareness about what constitutes sexual harassment and how to prevent it. The company has a zero-tolerance policy towards sexual harassment, with clear policies and procedures in place to deal with such incidents. Regular training sessions ensure that all employees are aware of these policies.

For more information about POSH at Capgemini, employees can reach out to the Human Resources department or the ICC. The company maintains strict confidentiality when a POSH complaint is reported, keeping the details of the complaint and the identities of the parties involved confidential, disclosed only to those directly involved in the investigation.

Capgemini provides full support to victims of POSH, ensuring their safety, providing necessary resources and support during the investigation, and taking appropriate action based on the findings of the investigation. This comprehensive approach to addressing POSH reflects Capgemini's commitment to maintaining a respectful and safe work environment for all employees.

Appraisal

The appraisal process at Capgemini involves a performance review by your manager, self-assessment, and a final review meeting. The process is designed to assess your performance against set objectives and competencies. Factors that influence the appraisal include your performance against set objectives, demonstration of competencies, contribution to team goals, and feedback from peers and managers. Appraisals are typically conducted on an annual basis, but the frequency can vary depending on your role and project requirements.

Your manager plays a crucial role in the appraisal process, assessing your performance against set objectives and competencies, providing feedback, and recommending any necessary training or development activities. To improve your appraisal, focus on consistently meeting your objectives, demonstrating the required competencies, contributing to team goals, and seeking regular feedback from your manager.

If you're not satisfied with your hike/increment, you can raise a concern through the internal portal by selecting 'Raise a Concern', choosing 'Appraisal Related' from the dropdown menu, filling in the details, and submitting the form. The relevant team will then reach out to address the issue.

After the appraisal process, you will receive feedback on your performance and any areas for improvement. This is also when any changes to your compensation or role are discussed. For more information about the appraisal process, you can reach out to your manager or the Human Resources department.

Capgemini maintains strict confidentiality during the appraisal process. The details of your appraisal are only disclosed to those directly involved in the process. The company provides full support to employees during the appraisal process, including clear guidelines on the process, offering feedback, and addressing any concerns or queries you may have.

In summary, the appraisal process at Capgemini is a comprehensive evaluation of an employee's performance, with a focus on set objectives and competencies. The company provides support and maintains confidentiality throughout the process, ensuring a fair and transparent assessment for all employees.

Resignation

The resignation process at Capgemini involves submitting your resignation through the internal portal, where you can access the 'Submit Resignation' section, fill in the necessary details, and submit your resignation. The Human Resources department then processes your resignation.

Capgemini typically requires a notice period before an employee leaves the company, the duration of which is usually specified in your employment contract. Upon resigning, any unused leaves are typically encashed as per the company's leave policy, though specifics can vary based on region and local labor laws.

The company conducts an exit interview process to understand the reasons for your departure and gather feedback. If there is a non-compete agreement in your contract, it may restrict you from working with certain competitors for a specified period after leaving the company. Your health insurance coverage typically ends on your last day of employment, though continued coverage may be possible under certain conditions.

For more information about the resignation process, you can reach out to your manager or the Human Resources department. Capgemini maintains strict confidentiality during the resignation process, and full support is provided to employees during this time, including clear guidelines on the process and addressing any concerns or queries.

Your pending projects are usually handed over to another team member or manager, with the handover process discussed and planned during your notice period. If you wish to withdraw your resignation, it's best to contact the HR department as soon as possible for guidance. The specifics of Capgemini's policy on non-compete agreements after resignation can be found in your employment contract or by contacting the HR department.

If you have issues during the resignation process, you should contact the HR department for resolution. The benefits you are entitled to after resigning, such as final salary payment and payment for unused leave, can depend on various factors and should be clarified with the HR department.

To get a reference from Capgemini after resigning, you can contact the HR department or your former manager and request a reference letter. The process for returning company property involves arranging with the HR department or your manager to return items like laptops, ID cards, and other equipment. If you have not received your final payslip after resigning, you should contact the Payroll department for information on when to expect it and to resolve any issues.

Notice Period

The notice period at Capgemini typically ranges from 30 to 90 days, depending on your role and region. The specific details can be found in your employment contract or in the 'Resignation Procedure' section of the Capgemini intranet portal.

If you wish to buy out the notice period, the options and process can vary based on your role and region. Generally, you would need to discuss this option with your manager and the HR department, and if approved, make the necessary payment to the company. The specifics of this process would be outlined in your employment contract.

If you do not serve the full notice period, there could be various consequences, including loss of certain benefits, a negative reference, or legal action in some cases. It's best to discuss any inability to serve the full notice period with your manager and the HR department as soon as possible.

During the notice period, you may be able to take leave, but this depends on the company's policy and your specific situation. It's best to fulfill your responsibilities during the notice period to ensure a smooth transition, and any need for leave should be discussed with your manager and the HR department.

Your responsibilities during the notice period typically include completing any outstanding work, handing over your duties to a colleague or replacement, and ensuring a smooth transition. You may also need to participate in an exit interview.

Negotiating the notice period is typically at the discretion of the company and depends on the company's policy and your specific situation. If you wish to negotiate the notice period, it's best to discuss this with your manager and the HR department.

If you encounter any problems during the notice period, you should contact the HR department for guidance and resolution.

What happens to your unused leave at the end of the notice period can depend on the company's policy. In some cases, you may be paid for unused leave, while in others, the unused leave may be forfeited.

Overall, the notice period and resignation process at Capgemini are designed to ensure a smooth transition for both the employee and the company. It's important to adhere to the company's policies and procedures during this time and to communicate effectively with your manager and the HR department.

