



POLICY STATEMENT OF THE CAPGEMINI GROUP IN GERMANY

ON THE SUPPLY CHAIN DUE DILIGENCE ACT (LKSG)

Capgemini 

OUR COMMITMENT TO RESPECTING HUMAN RIGHTS AND THE ENVIRONMENT

Capgemini has always been a people-centric company. It was founded in 1967 with the conviction that technology should be created by and for people.

By anchoring the protection of human rights and the prevention of environmental risks in our corporate strategy, we can not only make a positive contribution to an intact environment and society, but also strengthen the trust of our customers, suppliers and other stakeholders.

We firmly believe that sustainable management and responsible business practices contribute to our own long-term success. We are therefore committed to comprehensively implementing the requirements of the German Supply Chain Due Diligence Act and continuously working on the further development of our processes and measures.

Together, we can shape a better future in which human rights are protected and the environment is sustainably preserved.

This policy statement is issued in accordance with Sections 1 (1) No. 4, 6 (2) of the German Act on Corporate Due Diligence to Prevent Human Rights Violations in Supply Chains (Lieferkettensorgfaltspflichtengesetz - LkSG) and sets out the steps taken by the Capgemini Group in Germany to identify risks of human rights violations in our own business and our supply chain and to prevent their occurrence.

The policy statement has been fully reviewed and represents the policy statement of the Capgemini Group in Germany for the financial year 2023.



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1. Our commitment

As an employee-oriented company, the protection and promotion of human rights is a top priority for our entire workforce, our supply chain, our customer relationships and the areas of society in which we operate. Driven by our [seven values](#), people are at the heart of everything we do. In early 2023, Capgemini was recognized by the Ethisphere Institute as one of the [world's most ethical companies](#) for the 11th consecutive year.

As a signatory to the [UN Global Compact](#), Capgemini is committed to protecting and upholding human rights in accordance with the [United Nations Universal Declaration of Human Rights](#), the United Nations [Guiding Principles on Business and Human Rights](#) and the International Labor Organization (ILO) [Declaration on Fundamental Principles and Rights at Work \("ILO Declaration"\)](#) with its eight main conventions.

Even before the Supply Chain Due Diligence Act came into force on 01.01.2023, we had already introduced the [Capgemini's corporate guideline on respect for human rights](#) created a clear framework that enables us as a company as a whole and our individual employees to continue to protect and uphold human rights in our Group and along our supply chain.

Our suppliers undertake to comply with these standards, which are set out in our [Supplier Standards of Conduct](#). In this way, the benefits of our ethical corporate culture also extend outside our company.

We minimize the environmental impact of our business activities and proactively make a positive contribution to society at our locations. Climate change, environmental pollution and the depletion of natural resources are global challenges that we as a company must address. Through sustainable procurement, the use of environmentally friendly technologies and the reduction of our ecological footprint, we can make a positive contribution to protecting the environment. By averting environmental risks, we contribute to the conservation of natural resources and support the long-term sustainability of our own business activities.

2. About Capgemini & our program

Capgemini is one of the world's leading partners for companies in managing and transform-ing their business through the use of technology. Capgemini is guided by its purpose every day:



“Unleashing human potential through technology - for an inclusive and sustainable future.”

As part of the various business activities associated with this, people in the Capgemini Group in Germany and along its supply chains are exposed to various human rights and environmental risks. Comprehensive and uniform management of these risks is essential for a trusting, long-term relationship with all stakeholders in our network.

a) Procurement structure of the Capgemini Group in Germany

The Capgemini Group's procurement structure for external suppliers in Germany is managed centrally by the procurement department and is based on a clearly defined procurement process. The vast majority of external suppliers are based in and provide their services from Germany. All suppliers are comprehensively checked as part of the selection and onboarding process.

As part of a global network of Capgemini units in the worldwide Capgemini Group, the Capgemini Group in Germany also procures services from other Capgemini units. Our Group companies are therefore part of our supply chain. In our risk assessment and due diligence, we have not differentiated between members of the globally operating

Capgemini Group and third-party suppliers in our supply chain due to the lack of decisive influence on Capgemini units based abroad. However, we do not see an increased risk because every company in the global Capgemini Group that we subcontract to follows our Group policies and governance processes. They are based on the same values and ethics, and we agree that ethics and integrity are fundamental and uncompromising elements of our business. Furthermore, the application of the risk analysis developed for external suppliers to the relevant internal suppliers has resulted in a low risk.

b) Risk management of the Capgemini Group in Germany

The Capgemini Group's risk management methodology in Germany consists of three key elements in particular:

Risk mapping and risk analysis - an iterative approach performed on a regular basis to identify, analyze, assess and prioritize risks.

Risk management - the development, implementation and follow-up of action plans to mitigate critical risks, under the responsibility of designated persons.

Risk monitoring and reporting - tracking potential and current changes in exposure to identify risks (especially critical risks), and ensuring that these are known and understood by the Executive Board, the management of each operating unit and each business area.

In the financial year 2023, the Capgemini Group in Germany established a risk mapping for its direct **suppliers** based on the country risk (country from which the goods and/or services are purchased; i.e. the location of the respective supplier) and the purchasing category under which the purchased goods and/or services can be subsumed. From the individual risk factors determined in this way, an overall risk factor is calculated for each direct supplier of the Capgemini Group in Germany and, based on this, the overall risk is classified as low, moderate or increased. In the case of an overall risk of moderate or increased, an individual assessment is made for each supplier. Based on this, a decision is made on the preventive measures to be implemented. Occasion-related risk reviews and the resulting preventive and corrective measures are carried out independently of the risk mapping described above.

Based on this risk mapping, no increased risk was identified for any of the Capgemini Group's suppliers in Germany in the 2023 financial year. A moderate risk was identified for a small number of suppliers, primarily in the area of environmental protection. The suppliers identified in this way were examined for negative reporting on the internet and will be asked in a next step to help clarify and examine these risks by answering a targeted, individual questionnaire.

No information about our suppliers was received via the SpeakUp whistleblower system in the 2023 financial year up to the time of publication of this policy statement.

In order to establish a risk mapping of **our own business area**, the Capgemini Group in Germany has developed a self-assessment questionnaire that addresses the areas of equal opportunities and equal treatment, freedom of expression, freedom of association, harassment-free workplace, occupational safety and protection against child labor, forced labor and human trafficking. This self-assessment questionnaire is answered by HR departments of the Capgemini Group in Germany and serves to identify potentially adverse human rights impacts for employees, systematically determine risks and professionally assess their probability of occurrence. Furthermore, the annual external audits with regard to the existing ISO 14001 certification ensure that high standards are maintained in the area of environmental protection. Further information on this can be found in the [Capgemini Group's sustainability report](#).

c) SpeakUp complaints procedure

With SpeakUp,
Capgemini is
committed to:

- to examine all information provided in good faith without bias,
- Fair investigation of evidence,
- work towards fairness in the company organization,
- to treat information confidentially and
- to protect the whistleblower who makes a report in good faith against reprisals of any kind.

This commitment is backed by the entire management of the Capgemini Group in Germany.

The person entrusted by the Capgemini Group in Germany with the implementation of the complaints procedure is the Ethics & Compliance Officer, a person who is bound to secrecy, independent and not bound by instructions.

Further information on the procedure and the handling of personal data can be found in the [SpeakUp Policy](#), which is published in various languages on Capgemini's global website.

The Capgemini Group in Germany sees itself as an ethical and humane company whose most important assets are its employees and the people along its supply chains. To strengthen and continue this ethical approach, the [SpeakUp whistleblower system](#) was introduced in the Capgemini Group in Germany in consultation with the works councils. It is part of the risk management system implemented in the Capgemini Group in Germany to identify and remedy human rights and environmental violations. This enables us to ensure that we act ethically and respect human rights in all areas of our business practices.

SpeakUp is a voluntary, confidential whistleblowing system via internet and telephone, operated by an independent service provider and available in 61 languages. It is not only open to Capgemini employees, but is also available to external consultants, subcontractors, external personnel, clients, suppliers and business partners and their affiliates. Capgemini encourages a culture of openness in which serious concerns about Capgemini Group business practices and its supply chain can be raised in good faith and without fear of reprisal.

d) Preventive measures

We have incorporated necessary policies, processes, and guidelines throughout the Capgemini Group in Germany, to ensure we uphold and respect the abovementioned rights and standards.

We conduct various 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, human rights and environmental topics. We communicate extensively across the Capgemini Group in Germany on existing grievance mechanisms and processes, to empower our employees, suppliers and clients to raise queries or concerns about unethical or environmentally harmful behavior. 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.

Our [Code of Business Ethics](#) outlines the importance of ethical behavior that underpins Capgemini's business ethos. It reflects Capgemini's core values, which have guided our principles, permeated our culture and inspired the individual behavior of every employee for more than fifty years.

The Capgemini Group's environmental management system in Germany is ISO 14001 certified and is reviewed annually by external auditors. With the environmental management system, we ensure that our operational environmental performance is continuously improved and legal obligations are complied with.

All Capgemini suppliers are expected to adhere to our [Supplier Standards of Conduct](#) without exception, regardless of the nature and value of the business we do together. The Standards of Conduct set out our principles in relation to compliance with international, national and local laws, human rights, labor rights and modern slavery. They also require our suppliers to conduct their business to the highest standards of integrity and to avoid all forms of corruption, bribery, extortion or embezzlement and unfair business practices.

3. Governance

Responsibility for the obligation to respect human rights in its own business area and along the entire supply chain lies with the management of the Capgemini Group companies in Germany that are obliged to comply with the Supply Chain Due Diligence Act.

In agreement with the Country Board as the central institution in which the heads of all Capgemini Group departments in Germany are represented, the management has anchored the Human Rights Officer in the form of the newly created role of LkSG Officer in the Procurement department and tasked him with implementing and complying with the due diligence obligations.

The LkSG Officer is responsible:

- the management of human rights and environmental risks in accordance with the risk management system implemented in the Capgemini Group in Germany,
- the firm integration of risk management into the operational processes of the Capgemini Group in Germany,
- reviewing the effectiveness and necessary further development of risk management in the form of a continuous process by means of an annual and event-driven review,
- monitoring and controlling the processing of incoming complaints regarding violations of the LkSG as part of the established SpeakUp complaints procedure and
- the preparation of the annual report on the implementation of the due diligence obligations and its publication.

The LkSG Officer is supported by the LkSG working group in the performance of his duties on a regular and ad hoc basis and coordinates with it. This group meets at least once a quarter and consists of experts from Operations, Procurement, Compliance and Corporate Social Responsibility (CSR). In addition, the LkSG Officer is informed at least once a quarter by the Ethics & Compliance Officer about LkSG-relevant concerns received as part of the SpeakUp complaints procedure in anonymized form, reviews the measures proposed by the Ethics & Compliance Officer to remedy possible human rights violations or breaches of environmental obligations and ensures their implementation in the relevant departments.

The LkSG Officer reports at least once a year to the Country Board, the Executive Board, the relevant supervisory boards and economic committees of the Capgemini Group in Germany on the performance of his duties and the findings obtained from them.

Authorization

This declaration was adopted by the Country Board of the Capgemini Group in Germany on December 11, 2023 and approved by the management.

A handwritten signature in black ink, appearing to read 'H. Ljungström', written over a white background.

Henrik Ljungström

Head of Business Unit Germany



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FUTURE
YOU WANT**