



# MODERN SLAVERY ACT STATEMENT

# ACKNOWLEDGMENT OF COUNTRY

Capgemini acknowledges the Traditional Owners of the lands and waterways where our employees work and live. We pay our respects to elders past, present and emerging. We celebrate the stories, culture and traditions of communities working and living on these lands and waterways.

## Treaty of Waitangi

Capgemini acknowledges and respects the Treaty of Waitangi as the founding document of Aotearoa New Zealand. We are committed to upholding the principles of partnership, participation, and protection as enshrined in the Treaty and working in partnership with the Māori community to promote the well-being of all people in Aotearoa New Zealand.

# MODERN SLAVERY ACT STATEMENT



“Being recognized as one of the World’s Most Ethical Companies for a decade now illustrates that we strive hard to build a strong ethical culture at Capgemini. We have extra responsibility that comes with our global stature and we take it very seriously. As an employer of choice and a trusted business partner to many organizations across the world, it is critical for us to follow the highest ethical standards in everything we do.”

**Aiman Ezzat,**  
CEO, Capgemini Group



This Modern Slavery Statement is published by and on behalf of Capgemini Australia Pty Limited ACN 092 284 314 and its wholly owned subsidiaries<sup>1</sup> in compliance with Australia’s Modern Slavery Act 2018 (Cth). It describes the steps taken by Capgemini Australia in the financial year ending December 2022 to assess and address modern slavery practices within its operations and supply chains.<sup>1</sup>

## Introduction

The Capgemini Group’s greatest asset is its people. Since its foundation in 1967, the Capgemini Group has conducted its business on an ethical foundation, encouraging and enabling its employees and suppliers to operate within the same principled framework.

In 2023 and for the 11th year in a row, Capgemini has been recognized by Ethisphere®, a global leader in defining and advancing the standards of ethical business practices, as one of the 2023 World’s Most Ethical Companies®.

This is an acknowledgment of our ethical behaviour that makes us an employer of choice and responsible player in the eyes of our clients, shareholders, and the wider community.

Capgemini has a zero-tolerance approach to bribery, corruption, and human rights abuse. We do not accept that it is necessary for grave human rights abuses such as forced and compulsory labour, slavery, servitude, and human trafficking to be part of today’s modern businesses and supply chains. We are committed to our employees, our clients, and our suppliers to taking appropriate steps to do what we can to eradicate modern slavery in our operations and our supply chains.

1. This report also applies to (A) Whitesky Labs Pty Ltd, which was acquired by Capgemini Australia in March 2020 and was subsequently operationally integrated during the FY2020; (B) RXP Services Pty Ltd, The Works Melbourne Agency Pty Ltd, The Works Sydney Pty Ltd, and NSI Technology Pty Ltd, which were acquired by Capgemini Australia in March 2021 and subsequently integrated during FY2021; (C) Acclimation Pty Ltd, which was acquired by Capgemini Australia in July 2021 and was subsequently integrated in FY2021; and (D) Empired Limited, OBS Pty Ltd, Tusk Technologies Pty Ltd, Intergen Business Solutions Pty Ltd, eSavvy Pty Ltd and Conductive Pty Ltd, which were acquired by Capgemini Australia in November 2021 and subsequently operationally integrated in July 2022.



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

**Erica Salmon Byrne**  
Ethisphere CEO



## About Capgemini’s structure, operations, and supply chains

### Structure and operations

Capgemini Australia is an Australian proprietary company limited by shares and is a wholly owned subsidiary of Capgemini S.E., a French listed company with headquarters in Paris, France.

Capgemini creates and delivers business, technology, and digital solutions to achieve innovation and competitiveness. With more than 360,000 people globally in 2022, the Capgemini Group of companies is present in nearly 50 countries and represents over 120 nationalities. Of these, approximately 3000 are based in Australia.<sup>1</sup>

We understand that business value cannot be achieved through technology alone; it starts with people. We believe this human centred approach to technology enables our clients to respond successfully to complex and unpredictable challenges. A deeply multi-cultural organisation, Capgemini has developed its own way of working, the Collaborative Business Experience™, and draws on Rightshore™ - its worldwide delivery model.

### Supply chains

Capgemini Australia uses a purchase order policy and a central purchasing system which gives us a very precise and clear view of our procurement activity.

Our supply chains support both the delivery of our services to a diverse portfolio of clients and the running of our day-to-day operations. In these activities we uphold our own Group ethical principles and meet the standards of our clients.

As a services organisation, Capgemini’s operations involve the direct employment or engagement of skilled workers for the provision of services to our clients. Additionally, Capgemini works with suppliers of products and services including for the leasing and use of real estate, the procurement of personal computing devices, office equipment and technology, and for services to manage our operational facilities.

We recognise that our supply chains present some risks and challenges and that we must exercise vigilance in respect of all human rights violations including modern slavery and human trafficking. Our sourcing activities are required to meet a wide range of differing needs that are constantly changing. We recognize that our suppliers have their own suppliers and this makes for complex supply chains that affect our business and our clients’ businesses.

1. Based on employee headcount as at 31 December 2022

# Risks of modern slavery practices in operations and supply chains

Capgemini acknowledges that it has the potential to cause, contribute to, or be linked to modern slavery practices through its operations and supply chains and strives to do what it can to minimise any such risks.

## Operations

A risk may arise through Capgemini's use of skilled labour in the provision of services to its clients. We do not however, consider this risk to be significant given that the individuals who work in the IT and consulting arena are skilled, with greater control over their professional careers. The geographical risk is also somewhat reduced given that our immediate work force is based in Australia and New Zealand.

## Supply chains

The use of specialist contractors or skilled IT consultants to complement

our people centred approach is made possible by leveraging our renowned Rightshore™ model which ensures that other members of the Capgemini Group through whom we engage resources, share the same ethical principles as Capgemini Australia. Other but less common types of temporary personnel are engaged through external agencies who go through the same rigorous procurement due diligence as any other supplier.

Additionally, Capgemini sources products and services from suppliers for the running of our day to day operations. There are a number of factors which may influence the degree of risk associated with these businesses such as the degree of protection of human rights in the geographies in which they operate or source from, and the manner by which they seek to hire and outsource labour.



# Actions taken to assess and address risks, including due diligence and remediation processes

## Due Diligence

In March 2021 Capgemini announced the completion of its acquisition of RXP Services; expanding its operations in Australia with the addition of more than 550 professionals<sup>1</sup>. This was subsequently followed by Capgemini's announcement in July 2021 of the acquisition of Acclimation, a 100+ people strong Australian company specialising in SAP services Australia<sup>2</sup>, and then later in July 2021, the proposed acquisition of Empired Limited, a 1000+ people strong international Cloud Transformation and Digital Services Provider, with its main business located in Australia.

Notwithstanding this busy integration period, Capgemini Australia implemented a multi-layered approach to vendor onboarding to manage compliance and adherence to Capgemini policies and procedures. This involved applying three levels of due diligence to vendors based on level of spend and risk; with selected vendors being either required to accept Capgemini's Supplier Standards of Conduct or provide an approved alternative arrangement.

Building upon our initial due diligence and subsequent desk-top audit of selected higher-risk priority suppliers in FY21, Capgemini Australia continued in FY22 to undertake and implement the already established baseline due diligence and remediation processes including with respect to new on-boarded and integrated suppliers as part of the acquisition activities.

## Remediation processes

Capgemini is committed to implementing an ongoing process to support an ethical supply chain framework. This includes engaging with selected suppliers to identify, prevent, and mitigate potential adverse human rights impacts in its operations and supply chains, including modern slavery. Key elements of Capgemini's existing and proposed approach are outlined below.

## Supplier Standards of Conduct

Capgemini's Supplier Standards of Conduct<sup>3</sup> set the minimum commitment expected of suppliers with respect to corporate social responsibility, ethics and anti-bribery, regulatory compliance and business relationship standards. All Capgemini suppliers are expected to adhere to the Supplier Standards of Conduct with no exception, and regardless of the type and value of the business that is done.

The standards contain Capgemini's principles with regards to compliance with international, national and local law, human rights, labour rights and modern-day slavery and also outline the obligation of our suppliers to conduct their business with the highest standards of integrity, avoiding all forms of corruption, bribery, extortion or embezzlement, and unfair business practices.

1. <https://www.capgemini.com/au-en/news/capgemini-completes-the-acquisition-of-rxp-services/>

2. <https://www.capgemini.com/au-en/news/capgemini-acquires-leading-australian-sap-consulting-and-digital-solution-provider-acclimation/#:~:text=Paris%2C%20Sydney%2C%20July%205%2C,to%20its%20client%20portfolio%20locally.>

3. <https://www.capgemini.com/our-company/supplier-standards-of-conduct/>

## Global and local policies

Guided by our Seven Values<sup>1</sup>, the Capgemini Group plans to continue to forge trusted, long-term business relationships and lead the way into an ethical future. In 2010, we set up a formal ethics program at Capgemini, with our values at its core. This extensive program was crucial for the success of a diverse, decentralized Group like ours, with multi-cultural teams operating in more than 50 countries.

In addition to the Supplier Standards of Conduct, and to support Capgemini's ethical ambitions are Capgemini's policies which support our attitude towards human rights and modern slavery:

- Code of Business Ethics
- Group Conflict of Interest Policy
- Group Anti-Corruption Policy
- Group Competition Laws Policy
- Speak Up Policy
- Group Non-Retaliation Policy
- Code of Ethics for AI
- How to Manage with Integrity
- Capgemini Australia Whistleblower Policy

Since 2017 and following the law no. 2017-399 on the duty of care of parent companies and ordering companies, Capgemini has drawn up and continues to implement a reasonable duty of care plan to identify risks and prevent serious violations of human rights and fundamental freedoms, the health and safety of individuals and the environment, resulting from its own activities and those of its subsidiaries, as well as the activities of its subcontractors and suppliers

## Additional steps towards compliance

As a leading ethical company, Capgemini's commitment to protecting and promoting human rights is ingrained in our culture. As we aim to act always in line with our Values, respect of these most fundamental rights is natural and essential to the Capgemini business. Accordingly, in FY21 the Capgemini Group launched its global Human Rights Policy<sup>2</sup>, which states our human rights commitment, program and governance; endorsed by our Group CEO Aiman Ezzat.

Additionally, and in line with the ambitions stated in our Modern Slavery Statement for FY20, in FY21 Capgemini Australia developed and published its Australian Modern Slavery policy (last reviewed June 2023), and has taken steps to embed it within its procurement and on-boarding processes.



Honesty



Boldness



Trust



Freedom



Fun



Modesty



Team spirit



1. <https://www.capgemini.com/our-company/values-ethics/>

2. <https://www.capgemini.com/au-en/our-company/value-ethics/honoring-human-rights/>

## People

Capgemini is committed to providing a safe and inclusive work environment. In the services business, success is powered as much by shared values as by employee skills. Capgemini's business objectives and shared standards are designed to benefit not only shareholders and employees, but also every other participant in the value chain. It is our firm belief that these objectives can only be achieved through mutual respect and cooperation.

Capgemini Australia's recruitment and hiring process is designed to support decision-making in accordance with Capgemini's values and equal employment opportunity legislation and is carried out by a highly qualified team of recruiters and a preferred supplier panel.

Capgemini is committed to equal opportunities for all. In accordance with the requirements of the Workplace Gender Equality Act 2021, Capgemini Australia lodged its annual public report with the Workplace Gender Equality Agency and continues to be deemed compliant.

Our Group Global Charter for Diversity and Inclusion states Capgemini's commitment to recruit and retain a talented and diverse workforce and is supported by our local Diversity governance body who holds accountability for effecting diversity initiatives. In May 2022, Capgemini Australia was named Employer of the year for LGBTQ (Lesbian, Gay, Bisexual, Transgender, and Queer) inclusion and recognised as a Gold Employer for its efforts at the Australian LGBTQ Workplace Inclusion Awards.

To support our employees, we have created robust people policies and practices which go beyond compliance and deliver enhanced benefits supportive of work and home life. We offer a range of Health and Wellbeing initiatives to promote good mental and physical health.

At Capgemini we understand the importance of enabling employee voice. Speak Up<sup>1</sup> is a 24/7 web and phone-based ethics concerns reporting and incident management third party tool made available to Capgemini's staff, customers, suppliers, and business partners and is supported by our Whistleblower Policy. It upholds people's freedom to raise concerns and empowers Capgemini to put ethics into action whilst also building and safeguarding Capgemini's culture of openness and high ethical standards.

## Training and development

Capgemini Australia's success depends on its people and the ability of its people to perform in a collaborative way that will drive business results in line with Capgemini's values and ambitions.

The Capgemini Australia Modern Slavery working group was formed with representatives from across the business with specific focus responsibility areas of Legal, Compliance, Procurement, Human Resources, and Learning and Development. Key personnel within the working group continue to attend continuous professional development aimed at increasing knowledge of Modern Slavery and associated risks.

Capgemini's Talent, Learning and Development Policy outlines and defines the assistance that Capgemini Australia provides to its staff including mandatory training which is required for team members to complete their roles and responsibilities in accordance with Capgemini's policies both locally and globally.

Our training portfolio includes mandatory Ethics and Compliance training, and five of the mandatory e-learning modules cover human rights/modern slavery - as listed below:

- Values and Ethics
  - Honouring Human Rights (new module launched in 2023)
  - Harassment-free work environment
  - Understanding Conflicts of Interest
  - Speaking Up and Non-Retaliation
- These training modules are included in the new starters mandatory e-learning modules, and must be completed by all employees annually.

<sup>4</sup> <https://www.capgemini.com/our-company/values-ethics/speakup/>



# Assessing the effectiveness of our actions

Capgemini recognises that monitoring the effectiveness of our actions is key to assessing progress in addressing modern slavery risks.

Our operations and processes regularly undergo both internal and external audits. These reviews, coupled with our Speak Up<sup>1</sup> web and phone-based ethics concerns reporting and incident management third party tool and supporting Whistleblower Policy, enables the freedom for concerns to be raised while also allowing Capgemini Australia to log and track ethical violations.

For our supply chain partners, we are creating opportunities for deeper reviews through the roll out of our modern slavery-focused contractual clauses, further embedded Supplier Due Diligence questionnaires, and adherence to both Capgemini's Supplier Standards of Conduct and our local Australian Modern Slavery Policy within our procurement processes.

Looking ahead to activities in FY23 we will seek to strengthen remediation actions and assess effectiveness by engaging more closely with any high-risk suppliers which are identified via our compliance due diligence process including those who are on-boarded as part of our ongoing acquisition and integration activities.

## Process of consultation

Given that Capgemini Australia's wholly owned subsidiaries were fully operationally integrated with Capgemini Australia in the relevant reporting period, no separate process of consultation was required in the preparation of this statement.

## Looking to the future

Capgemini's approach to managing modern slavery risks is an ongoing and long-term process.

During FY23, the focus of the Capgemini Modern Slavery working group will be to keep abreast of any changes to the Modern Slavery Act and any associated changes or enhancements which may be required to align to the Act, following the recent parliamentary review and consultation process. In addition, Capgemini will continue to explore opportunities to expand our approach to assessing risks as an organization, seeking industry best practice guidance to expand our knowledge, and utilising tools for self-assessment to measure our level of compliance across the business.

Capgemini and its dedicated Modern Slavery working group will focus on implementing enhanced due diligence and remediation processes with regular engagement and feedback between key functional areas of the business.

Capgemini will continue to raise awareness of ethical issues including modern slavery with targeted training and e-learning on Capgemini's Code of Business Ethics as well as liaise with Capgemini global counterparts to determine and leverage a unified global strategy focusing on human rights and other ethical matters including, in particular, modern slavery risks.

These steps will be complimented by the Capgemini Group's CSR ambition to be recognized globally as a leading responsible company, using our expertise for positive impact.

Our forward and proactive approach to ethical issues including modern slavery, results from insights and collaboration between multiple functional areas within the Capgemini organisation including Procurement, Human Resources, Legal, Ethics, and Compliance.

Capgemini acknowledges the need to strive for continuous improvement in our understanding, oversight and management of modern slavery risks in our operations and supply chains.

This Modern Slavery Statement was approved by the principal governing body for Capgemini Australia, the Capgemini Australia Pty Limited Board of Directors on and signed by Capgemini Australia's Managing Director.



**Kaylene O'Brien**  
Managing Director  
Capgemini Australia and New Zealand

1. <https://www.capgemini.com/our-company/values-ethics/speakup/>



## About Capgemini

Capgemini is a global leader in partnering with companies to transform and manage their business by harnessing the power of technology. The Group is guided everyday by its purpose of unleashing human energy through technology for an inclusive and sustainable future. It is a responsible and diverse organization of over 360,000 team members in more than 50 countries. With its strong 55-year heritage and deep industry expertise, Capgemini is trusted by its clients to address the entire breadth of their business needs, from strategy and design to operations, fueled by the fast evolving and innovative world of cloud, data, AI, connectivity, software, digital engineering and platforms. The Group reported in 2022 global revenues of €22 billion.

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