



# Our Code of Business Ethics

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# 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**

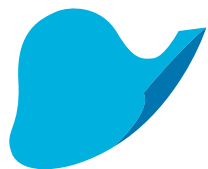
*is for all team members, of all the companies of the Group, collectively referred to in this document as “the Group”.*



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# Contents

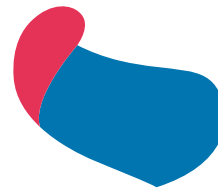




Team spirit



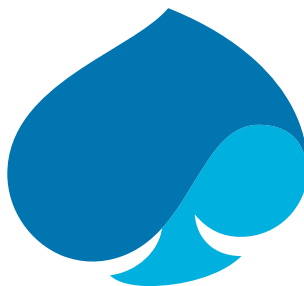
Honesty



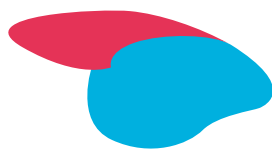
Boldness



Modesty



Trust



Fun



Freedom

# 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



**Megan Clarken**



**Aiman Ezzat**  
CHIEF EXECUTIVE OFFICER



**Ulrica Fearn**



**Maria Ferraro**



**Pierre Goulaieff**



**Siân Herbert-Jones**



**Hervé Jeannin**



**Belen Moscoso  
del Prado Lopez-Doriga**



**Xavier Musca**



**Frédéric Oudéa**



**Patrick Pouyanné**



**Olivier Roussat**



**Kurt Sievers**

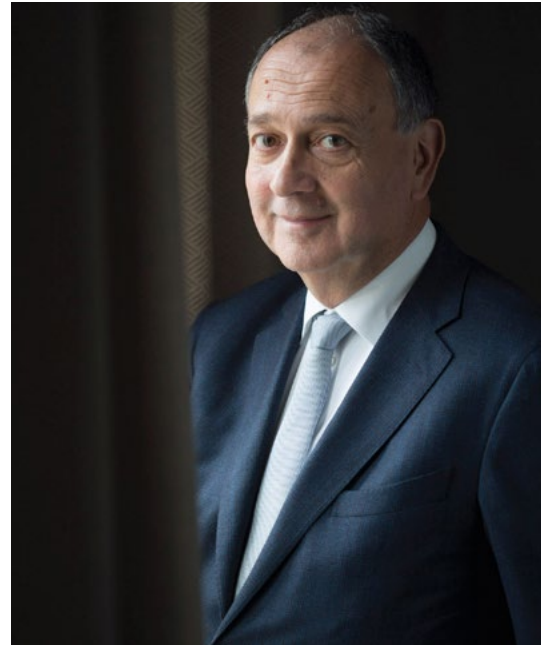


**Lucia Sinapi**

# 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



**Nive Bhagat**  
CHIEF FINANCIAL OFFICER



**Jean-Philippe Bol,**  
OPERATIONS TRANSFORMATION  
& INDUSTRIALIZATION



**Anirban Bose,**  
FINANCIAL SERVICES, APAC



**Andrea Falleni,**  
SOUTHERN EUROPE



**Cyril Garcia,**  
GLOBAL SUSTAINABILITY SERVICES,  
CORPORATE RESPONSIBILITY



**Franck Greverie,**  
PORTFOLIO OFFERS, CLOUD INFRASTRUCTURE  
SERVICES, INSIGHTS & DATA, BUSINESS SERVICES



**Anne Lebel,**  
CHIEF HUMAN RESOURCES OFFICER



**William Rozé,**  
CAPGEMINI ENGINEERING



**Michael Schulte,**  
NORTHERN EUROPE



**Olivier Sevilla,**  
CHIEF OPERATING OFFICER



**Jerome Simeon,**  
GLOBAL INDUSTRIES, ETHICS

# 1. Our Code of Business Ethics

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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](http://www.capgemini.com/speakup)

Honesty  
Conflict of interest  
People  
Clients  
Special  
Business Int  
Open



# 2. People

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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

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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.

Honesty  
Conflict of interest  
People  
SpeakUp  
Business Integrity  
Open



# 4. Business relationships

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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

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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

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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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[www.capgemini.com](http://www.capgemini.com)

