Capgemini’s Export Control Compliance Statement

As a global organisation, the Capgemini Group is committed to complying with the strategic export control laws and practices of all relevant jurisdictions and regimes in which we operate and conduct business. We have a presence in over fifty countries, hence it is imperative that our values of integrity and honesty are adhered to all times, without exception. Capgemini does not condone the export of controlled equipment, technology or data in violation of applicable export control laws or regulations. Export control breaches are criminal offences, legal penalties are severe and reputational impacts are profound so a zero tolerance approach is of paramount importance.

The purpose of strategic export controls is to protect national security and foreign policy by ensuring that relevant exports are kept out of the hands of unauthorised users and not used for unauthorised purposes. This includes military equipment, technology and data and also a broad range of ‘dual use’ items that are normally used for civilian purposes yet also have military applications.

For Capgemini UK plc, the Company Secretary has the ultimate responsibility for export compliance, assisted by senior leaders with export control expertise across the business. It is critical that all Capgemini UK team members take a proactive approach to identifying when an export may take place and/or when Capgemini UK may be requested to handle material subject to export regulations arising from other jurisdictions. Every team member is expected to take this matter seriously and familiarise themselves with our export control procedures which are available on Capgemini Group’s intranet. A wealth of information, including webinars on export control, is available to contextualise the risk with export control restriction. Capgemini UK has developed an innovative export control bid process to facilitate handling exports with ease and efficacy. All comments and queries regarding this process are directed to Capgemini UK’s Export Control expert, Creole Palmer, a member of our UK Legal team.

If any team members have questions concerning the legitimacy of a transaction, the risks or potential violations, this is raised with their manager in the first instance to address the concerns. Compliance with export control is vital for our entire business whilst ensuring our ongoing compliance with regulatory regimes.

For any questions, please direct them, in the first instance, to Creole Palmer, Lawyer & Export Control Lead at creole.palmer@capgemini.com.

Signed:

[Signature]

Julie Mangan
Company Secretary, Capgemini UK plc