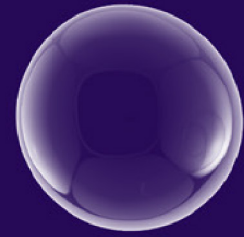


accenture



Conflict Minerals Report

May 2022



Accenture plc

Conflict Minerals Report

For The Year Ended December 31, 2021

Accenture plc (“Accenture,” “the Company,” “we,” “us,” or “our”) has prepared this Conflict Minerals Report for the calendar year ended December 31, 2021, to comply with Rule 13p-1 under the Securities Exchange Act of 1934, as amended (“Rule 13p-1”). Rule 13p-1 imposes due diligence and reporting obligations on US Securities and Exchange Commission (“SEC”) registrants whose manufactured products, including products contracted to be made for each registrant, contain “conflict minerals” necessary to the functionality or production of those products. Rule 13p-1 defines “conflict minerals” to include gold, cassiterite, columbite-tantalite and wolframite or their derivatives (tin, tantalum and tungsten) (collectively referred to as “3TG”) that are sourced from the Democratic Republic of the Congo and its adjoining countries including Angola, Burundi, the Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia.

In accordance with Instruction 3 to Item 1.01 of Form SD, this report does not include products manufactured by companies acquired after the deadline for the 2021 reporting period.

Introduction

Accenture is a leading global professional services company that helps clients build their digital core, transform their operations, and accelerate revenue growth—creating tangible value across their enterprises at speed and scale. We are uniquely able to create these outcomes because of our broad range of services in Strategy and Consulting, Technology, Operations and Accenture Song (f/k/a, Accenture Interactive), with digital capabilities across all of these services. We combine unmatched industry experience and specialized capabilities, together with our culture of innovation and shared success to serve clients in more than 120 countries.

While Accenture is primarily a services business, we do manufacture or have manufactured on our behalf a limited and immaterial number of hardware products. Less than one-tenth of one percent of Accenture’s fiscal 2021 revenues were derived from the manufacture and sale of hardware by our Industry X business.

Industry X embeds intelligence in how clients run factories and plants, as well as design and engineer connected products and services—making manufacturing and operations more efficient, effective and safe; enabling companies to transform how they make things, and the things they make, for sustainable growth.

Small amounts of 3TG are necessary to the functionality or production of the hardware products manufactured and sold by Industry X. We do not purchase ore or unrefined 3TG from mines, and we do not have a direct relationship with 3TG smelters or refiners; we purchase components from a network of suppliers, so we are considered a downstream purchaser in the mineral supply chain. We rely on our direct suppliers to assist with our reasonable country of origin inquiry (“RCOI”) and due diligence efforts, including the identification of smelters and refiners, for the minerals contained in the components that they supply to us. These direct suppliers similarly rely on information provided by their suppliers. On the basis of the RCOI and due diligence measures described below, as of this reporting period, we do not have sufficient validated information from our suppliers to determine with specificity the facilities used to process, the country of origin or the mine or location of origin of the 3TG used in any component supplied to us for use in our products.

Reasonable country of origin inquiry and due diligence process

In accordance with Rule 13p-1, we conducted a good faith RCOI to seek to identify the location of the facilities used to refine or process the 3TG used in our products. We designed our due diligence measures to conform, in all material respects, to the Organization for Economic Co-operation and Development's (the "OECD") *Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*, including related supplements, consistent with our position as a downstream company. Our due diligence included the following elements contained in the OECD framework:

- Step 1: Establish strong company management systems;
- Step 2: Identify and assess risks in the supply chain;
- Step 3: Design and implement a strategy to respond to identified risks;
- Step 4: Carry out independent third-party audit of supply chain due diligence at identified points in the supply chain; and
- Step 5: Report on supply chain due diligence.

Step 1: Establish strong company management systems

Adopt a responsible mineral sourcing policy

As a signatory to the United Nations Global Compact since 2008, we maintain a long-standing commitment to respecting human rights in our business operations and our supply chains. Guided by our core values and as stated in our Code of Business Ethics, we seek to align to the United Nations Guiding Principles on Business and Human Rights, and we also adhere to relevant international instruments and documents.

The relationship between Accenture and our Accenture suppliers is a critical component of our support for human rights. Consistent with Accenture's standard procurement process, we require our suppliers to comply with our global Supplier Standards of Conduct, which supplements our Code of Business Ethics, and sets out the legal and ethical standards (including in relation to human rights) that Accenture suppliers are required to uphold or to which they must make an equivalent commitment. In turn, Accenture expects our suppliers to apply our Supplier Standards of Conduct to their own suppliers.

We continue to evolve our global Supplier Standards of Conduct in line with our commitment to responsible business. During 2021, we amended our Supplier Standards of Conduct to include a specific provision requiring suppliers to comply with all applicable conflict minerals reporting requirements and adopt policies and procedures that are reasonably designed to prevent products or parts that are not responsibly sourced from entering our supply chain.

In June 2021, we also adopted a new internal policy on Responsible Mineral Sourcing to reflect our commitment to responsibly sourcing 3TG used in our products and transparency over the 3TG supply chain. This policy requires our employees to report to the 3TG working group when they become aware of instances where Accenture may be manufacturing and selling hardware products and to participate in any subsequent due diligence efforts regarding those products. Our Responsible Mineral Sourcing policy is available at https://www.accenture.com/_acnmedia/PDF-173/Accenture-Policy-1007-Responsible-Mineral-Sourcing-Modern-Slavery-Statement.

Structure internal management systems to support supply chain due diligence

As our business evolves, we recognize the need to continuously adapt our human rights due diligence strategies. We continue to incorporate human rights due diligence within many of our broader enterprise risk management systems and legal compliance processes, and at different stages of the supply life

cycle. As part of our human rights and supply chain due diligence and monitoring strategy, Accenture has established a multidisciplinary 3TG working group, which includes representatives from our Industry X business, Legal, Procurement and Sustainability. The 3TG working group is responsible for implementing our 3TG compliance program and meets regularly throughout the year, both internally and with our independent third-party specialist supply chain diligence provider, to discuss the design and modification of the 3TG due diligence process, monitor progress of the 3TG due diligence process and report on the findings of the 3TG due diligence process. In addition, the 3TG working group has also provided training on 3TG supply chain diligence and compliance to relevant internal stakeholders.

Establish a system of controls and transparency over the 3TG supply chain

During 2021 we conducted a risk assessment of our 3TG supply chain in order to establish a system of controls and transparency over the supply chain. By conducting a series of interviews across Accenture, our 3TG working group confirmed that our reporting requirement for the 2021 calendar year was limited to the products that are contracted to be manufactured for FutureMove Automotive Co., Ltd (“FutureMove”), a company that Accenture acquired in late 2019.

Our FutureMove business team identified suppliers that provide components to their products that are known or likely to contain 3TG. Our independent third-party specialist supply chain diligence provider requested that the identified suppliers use the Responsible Minerals Initiative’s (“RMI’s”) Conflict Minerals Reporting Template (“CMRT”) to identify 3TG smelters and refiners (“SORs”) and associated countries of origin. We reviewed the supplier responses for completeness, accuracy and plausibility and followed up with suppliers who did not respond or whose responses were identified as having potentially incomplete or inaccurate information. After all of the follow-ups were complete, we achieved a 100% response rate from our 18 in-scope suppliers for the 2021 reporting year.

In 2021, our Procurement team also engaged an external specialist consultancy firm to advise on the development of processes and resources required to scale up our 3TG compliance program and improve the transparency of our 3TG supply chain. As a result of these assessments, our ventures and acquisitions due diligence process now includes questions to identify any potential new products containing 3TG, for example.

Strengthen company engagement with suppliers

Our FutureMove business team and our independent third-party specialist supply chain diligence provider worked with many of the identified suppliers to educate them on 3TG compliance, how to complete a CMRT and to improve the quality and accuracy of the information that our suppliers provided to us. Through our diligence provider, we provided our suppliers with access to training materials on 3TG compliance.

Establish a company-level grievance mechanism

Employees of Accenture and Accenture suppliers may report concerns or violations (anonymously where permitted by local law) through the Accenture Business Ethics Helpline, which is accessible via phone and our website.

Step 2: Identify and assess risks in the supply chain

Use best efforts to identify the smelters and refiners in the supply chain

In 2021, we identified 18 in-scope suppliers, who were contacted by our independent third-party specialist supply chain diligence provider and by Accenture to obtain country-of-origin information. Through this process, we were able to obtain responses from 100% of our in-scope suppliers for this initial reporting year. Our suppliers, reporting at a company level (i.e., for all of their products, not just those that they sold to us), identified 358 SORs that may have been in their supply chains.

Identify the scope of the risk assessment of the 3TG supply chain

Our diligence provider's 3TG supplier questionnaire asks our suppliers to identify SORs in their supply chains. Quality control flags are raised on inaccurate or incomplete responses and suppliers are contacted again to correct the information and/or obtain additional information. Once the results from our diligence provider are received, our 3TG working group reviews the results to identify any SORs in our suppliers' supply chain that are not verified as "Conformant" with RMI's Responsible Minerals Assurance Process ("RMAP") or an equivalent cross-recognized assessment protocol.

Step 3: Design and implement a strategy to respond to identified risks

Our risk mitigation is focused on our direct suppliers because that is where we have the most leverage. We engage with our suppliers to encourage them to utilize Conformant SORs and to encourage non-Conformant SORs in their supply chains to participate in RMAP or an equivalent cross-recognized assessment protocol.

Step 4: Carry out independent third-party audit of supply chain due diligence practices at identified points in the supply chain

Due to our position in the supply chain, we do not conduct or commission independent third-party audits of SORs. We rely upon the audits conducted by industry organizations, such as the RMI.

Step 5: Report annually on supply chain due diligence

This conflict minerals report will be filed with the SEC and a copy of it will be made available at <https://investor.accenture.com/filings-and-reports/sec-filings>.

Reasonable country of origin inquiry and due diligence results

See "Step 2: Identify and assess risks in the supply chain" above for a description of the 3TG mineral due diligence process conducted by Accenture and our independent third-party specialist supply chain diligence provider. Through this process we were able to obtain responses from 100% of our in-scope suppliers for the 2021 reporting year. However, these responses fall into one or more of the following categories: (i) indication that no 3TG are used in components that are provided to Accenture, (ii) data with respect to the supplier's overall, company-level 3TG sourcing, without specifying whether such 3TG were used in components provided to Accenture or indication that the supplier is unable to provide the information as it specifically relates to the components that are provided to Accenture, (iii) indication that the supplier is unable to provide SOR information at this time, and/or (iv) indication that the supplier is unable to provide or is still in the process of determining the country of origin or mine or location of origin of 3TG from its suppliers. Accordingly, as of this reporting period, we do not have sufficient validated information from our in-scope suppliers to determine with specificity the facilities used to process, the country of origin or the mine or location of origin of the 3TG used in any component supplied to us for use in our products.

Future risk mitigation efforts

We intend to take the following steps in 2022 to improve our 3TG due diligence efforts and mitigate sourcing risks:

- Continue to follow the due diligence process described in this report with any refinements as appropriate.
- Direct our suppliers to information and training resources to target an appropriate response rate to our supplier surveys and improve the content of the responses.

- Engage with our suppliers to encourage them to utilize Conformant SORs and to encourage non-Conformant SORs in their supply chains to participate in RMAP or an equivalent cross-recognized assessment protocol.
- Continue to provide training on 3TG supply chain diligence and compliance to relevant product teams and others throughout Accenture.
- Continue to include questions to identify any potential new products containing 3TG in our Industry X ventures and acquisitions due diligence process and to integrate our Industry X acquisitions into Accenture processes, including our 3TG and other compliance programs.

These specific efforts are in addition to our general supply chain due diligence and monitoring strategy and processes.

Forward-looking statements

This Conflict Minerals Report contains forward-looking statements within the meaning of the federal securities laws. All statements other than statements of historical fact could be deemed forward looking, including but not limited to statements regarding Accenture's efforts to reduce sourcing risks, ability to work with vendors to ensure conflict-free supply chains and products, and improve responses and quality of information collected from vendors. Words such as "expects," "anticipates," "intends," "plans," "believes" and variations of these words, and similar expressions are intended to identify such forward-looking statements. Actual results could differ materially from the forward-looking statements. These statements involve substantial risks and uncertainties, including, without limitation, risks and uncertainties associated with the progress of industry and other supply chain transparency and smelter or refiner validation programs for 3TG (including the possibility of inaccurate information, fraud and other irregularities), inadequate supplier education and knowledge, limitations related to the ability or willingness of suppliers to provide accurate, complete and detailed information and limitations on our ability to verify the accuracy or completeness of any supply chain information provided by suppliers, third-party audit programs or others, as well as those risks and uncertainties described in the filings we make with the SEC. We undertake no obligation to update any forward-looking statements made in this Conflict Minerals Report as a result of new information, future events, or otherwise, except as required by law. You should not rely upon forward-looking statements as predictions of future events. Forward-looking statements represent our management's beliefs and assumptions only as of the date of filing of this document.

Neither our Form SD nor this report incorporates by reference the content of any website to which we refer.