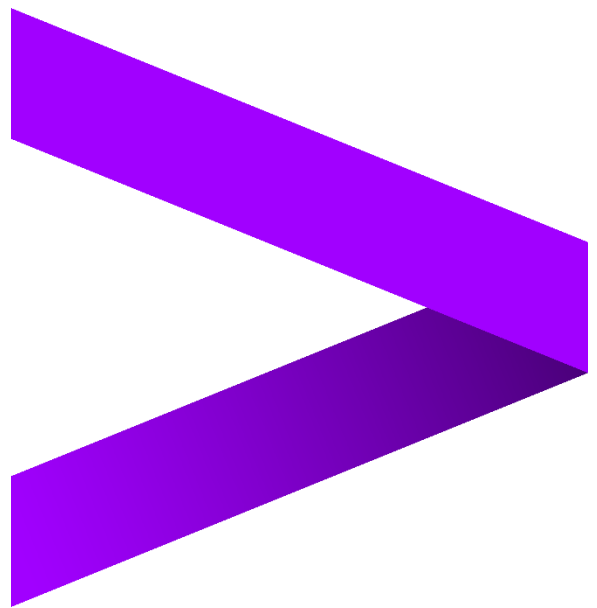




Policy 1000 – Speaking Up and Zero Tolerance for Retaliation



Purpose of the policy

This policy describes:

- how you can raise concerns about any violation of any law, Accenture's Code of Business of Ethics or an Accenture policy, including concerns about harassment, discrimination, retaliation or workplace violence or threats;
- what you must do if someone raises a concern;
- how you are protected from retaliation if you raise a good faith concern under this policy, and what action Accenture will take if there is any retaliation against you.

Policy

1. We want you to speak up about violations of law, our Code or policy

If you have a concern about any issue that you believe (or suspect) may violate any law, Accenture's Code of Business of Ethics (our "Code") or an Accenture policy, you have a right to speak up and we want you to speak up. This includes reporting issues relating to:

- Any harassment (including sexual harassment and harassment based on personal characteristics such as race, color, ancestry, national/regional or ethnic origin, religion, sex, gender identity, sexual orientation, pregnancy, age or disability)
- Disrespectful behavior or insensitive treatment, even if that behavior may not rise to the level of harassment or discrimination
- Discrimination
- Retaliation
- Workplace violence or threats

If you are unsure whether an issue should be reported, we encourage you to contact the Human Resources or Legal channels listed in Section 2.1. below for guidance. We want to hear from you. It does not matter whether you raise a concern verbally or in writing. We take all good faith concerns seriously and all steps necessary to ensure that you do not experience any form of retaliation for raising a concern. Employees who raise such concerns play a critical role in ensuring that Accenture continues to operate with the highest standards of integrity, ethics and compliance. Nothing in this policy or in any agreement between you and Accenture is intended to prohibit you (with or without notice to Accenture) from reporting possible violations of laws or regulations to a governmental agency, regulatory body or a local authority, or from making disclosures that are protected under whistleblower laws and regulations.

2. How to raise concerns

2.1. Channels for raising concerns

We understand that it is not always easy or comfortable to raise concerns. As a result, we provide multiple reporting channels in order to minimize potential unease in reporting an issue that may involve a colleague, an Accenture Leader, a client, supplier or contractor, or anyone else. You may raise concerns through any of the following channels so we can take action on your behalf:

- **Your management, other trusted advisors or any Accenture Leader** – You can always raise any concern, or ask for advice or support, through your management (including, for example, your supervisor or their leadership), other trusted advisors (including, for example, leads outside of your management, Employee Resource Groups, etc.) or any Accenture Leader. These individuals are

expected to have the knowledge and experience on how to receive and escalate concerns.

- **Human Resources or Legal** – You can also speak to members of Human Resources, (including your HR Representative or any member of the Employee Relations team) or anyone in Legal (including the Global Conduct Counts Matters team) in relation to any concern you have.
- **Accenture Business Ethics Helpline** – If you are not comfortable raising your concern through any of the options above (or you have done so, but did not receive a satisfactory response), you may visit the Accenture Business Ethics Helpline, where you may report your concern via the web or obtain a country-specific phone number to speak with an agent 24 hours a day, seven days a week. In most cases, you may remain anonymous when using the Accenture Business Ethics Helpline; however, in certain countries this may not be the case due to local legal restrictions.

Country-specific points of contact - In some countries there may be a designated individual appointed as a specific point of contact to receive concerns and discuss possible resolutions. You should check with your local Human Resources team or any member of Legal to determine if your country has this supplementary channel. See also Section 2.2. below.

2.2. How to raise concerns about disrespectful behavior, harassment, discrimination or retaliation

If you believe you have experienced or witnessed disrespectful behavior, harassment (including sexual harassment or harassment based on personal characteristics such as race, color, ancestry, national/regional or ethnic origin, religion, sex, gender identity, sexual orientation, pregnancy, age or disability), discrimination or retaliation there are several ways to raise this.

Reporting **disrespectful behavior** is not mandatory, but Accenture **strongly encourages** you to do so and requires that you report disrespectful behavior based on personal characteristics that rises to the level of harassment (see below). If you have:

- **experienced** disrespectful behavior from an Accenture employee, you could speak to the person involved and ask them to stop. In many cases, a discussion with individuals closest to the situation may be the best and fastest way to resolve an issue or concern. If they do not stop or if you prefer not to speak to the person, or it involves someone who is not an Accenture employee (such as an employee of an Accenture client or supplier), then we strongly encourage you to raise it to any of the channels listed in Section 2.1. above.
- **witnessed** disrespectful behavior, we strongly encourage you to report it to any of the channels listed in Section 2.1. above.

You are **required to report** instances of **harassment, discrimination or retaliation**, including disrespectful behavior that rises to the level of harassment (e.g., a sustained pattern of conduct, a single incident of severe conduct or disrespectful behavior based on personal characteristics). If you have:

- **experienced** harassment, discrimination or retaliation by an Accenture employee or from someone who is not an Accenture employee (such as an employee of an Accenture client or supplier), you must report it to any of the channels listed in Section 2.1 above. See also the responsibilities of those to whom you raise a concern in Section 3 below.
- **witnessed** harassment, discrimination or retaliation you must report it to any of the channels listed in Section 2.1 above. We also encourage you to take any appropriate steps necessary to immediately intervene and stop any ongoing harassment, discrimination or retaliation from occurring.

2.3. Specific obligations of Accenture Leaders

If you are an Accenture Leader and you witness or become aware of:

- **disrespectful behavior:**
 - You must make sure the person experiencing the disrespectful behavior is ok; and
 - You should speak to the person involved and require them to stop; and
 - If the person does not stop or you prefer not to speak to the person, you must escalate the matter promptly to the relevant Accenture Leader, Human Resources, and/or Legal or via the Accenture Business Ethics Helpline.
- **harassment** (including sexual harassment or harassment based on personal characteristics such as race, color, ancestry, national/regional or ethnic origin, religion, sex, gender identity, sexual orientation, pregnancy, age or disability) or **discrimination**: you must take the same steps as above in the case of disrespectful behavior, but even if you step in and stop the harassment or discrimination from occurring, you must always report the matter immediately to Human Resources or Legal. The requirement to report harassment includes disrespectful behavior that rises to the level of harassment due to a sustained pattern of conduct, a single incident of severe conduct or if based on personal characteristics; if you are unsure consult with HR.

See additional obligations of **Accenture Leaders** in Section 5. below regarding retaliation. Leaders who fail to report violations of this policy may be subject to discipline, up to and including termination.

3. Responsibilities when someone raises a concern to you

When someone raises a concern to you that relates to potential **violations of the law, our Code or Accenture policy, you must take the concern seriously and use good judgment to take appropriate action** – with sensitivity, urgency and appropriate confidentiality. If someone is seeking your guidance, take the time to give them the information they need to make the right decision. If you are not sure what to say or do, reach out to an Accenture Leader, Human Resources or Legal to get the guidance or input you need to determine the best way to address the concern.

However, you must promptly report potential:

- violations involving **harassment, discrimination or retaliation** to the **Human Resources or Legal** channels listed in Section 2.1 above (including disrespectful behavior that rises to the level of harassment due to a sustained pattern of conduct, a single incident of severe conduct or if based on personal characteristics; if you are unsure consult with HR)
- **workplace violence or threats** as described in Section 6 below
- **violations of law** to **Legal**

4. What happens after a concern is raised

We take seriously all concerns raised. The way we handle a concern will depend on its nature and severity. We may handle through discussions with relevant work colleagues, Accenture Leaders or Human Resources, or we may handle by conducting fair and thorough investigations. But no matter how you raise your concern, we will always seek to ensure that it is handled promptly by the most appropriate global or local team or people within Accenture.

The purpose of **investigations at Accenture** is to understand concerns that have been raised and to resolve misconduct. When you raise a concern, you are not expected to "make your case" or prove a "your story vs. their story" scenario. Instead, you will simply be asked in a private setting to explain what happened in more detail so that Accenture can fully understand the issue. We will communicate with you so that you understand our investigation process in more detail. Among the ways we determine what happened is through additional interviews in private with you, with others who have information and with the person against whom the concern is raised, to give them an opportunity to respond. Investigations may also involve reviewing documents or

communications. At the conclusion of an investigation, the investigating team, sometimes with input from others in Human Resources or Legal, will determine what outcomes are appropriate (for example, counseling or other discipline) and ensure that they are applied fairly and consistently on a global basis – regardless of seniority, position or contribution to Accenture.

Accenture will handle all concerns raised with **appropriate confidentiality** and with a high degree of sensitivity. All those involved in investigating and/or addressing a concern will respect the need for confidentiality wherever reasonably possible. In some situations, privacy restrictions may also mean that we cannot disclose the actions that are taken to resolve a particular concern.

5. No retaliation

Accenture prohibits retaliation in any form. Accenture will not tolerate retaliation against any employee who:

- comes forward to raise, in good faith, a concern about a violation of any law, our Code or any Accenture policy (including concerns about disrespectful behavior, harassment, discrimination or retaliation) or
- assists us, or a law enforcement authority, by providing information to address a concern.

Accenture Leaders have a specific obligation to ensure that there is no retaliation against such employees, either during a matter or after it is closed, and to report retaliation immediately to Human Resources or Legal. Accenture takes seriously all reports of retaliation. If you believe you have been subjected to retaliation, you must raise your concern.

"Retaliation" is actual or threatened unfair or negative treatment of any kind against an individual because that person has raised a good faith concern or participated in a report or investigation. Retaliation can take many forms; examples include denying an employee a promotion or a raise, declining to staff an employee on a particular project, treating an employee with harassing or insensitive conduct, spreading rumors intended to cause harm to an employee, unjustified negative attacks on an employee's personal or professional life, shunning, excluding or any other negative treatment that adversely affects the employee's workplace experience. Furthermore, retaliation can be overt or subtle. It can occur while an investigation is ongoing or after a matter is closed. Overt retaliation occurs when someone specifically treats an employee differently due to their involvement in a report or investigation, such as refusing to staff the employee on a project because he or she is "not seen as a team player." Retaliation can also be subtle, where the negative treatment is not explicitly tied to an employee's prior involvement in a report or investigation, but where the person involved nonetheless treats the employee differently.

6. Reporting workplace violence and threats

6.1. Emergency situations

If you are at immediate risk of physical harm or have suffered physical harm, or you believe that any other individual is at immediate risk of physical harm or has suffered physical harm:

- Follow all safety and emergency procedures at our facilities and at client or other work sites.
- Contact local emergency services or appropriate law enforcement immediately when it is safe to do so and follow directions provided.
- After which, contact any site security available and the Accenture Workplace team; if there is no site security or local Accenture Workplace Team immediately available, contact the Accenture Security Operations Center (ASOC).

6.2. Potentially dangerous situations

If the potential for workplace violence exists, you must:

- Contact the Accenture Security Operations Center (ASOC), who will contact the Global Asset Protection (GAP) team immediately. Follow any recommended actions.
- Advise a member of Human Resources and site security or the Accenture Workplace team (Human Resources should engage the local Employee Relations/Labor Relations team).

7. Violations of this policy

Violations of this policy may lead to disciplinary action (up to, and including, termination of employment). While Accenture retains discretion as to how to respond to any violation of this policy, any disciplinary process will be undertaken in accordance with all applicable local laws and other legal requirements.

Definitions

In this policy, “Accenture” means Accenture plc and its and their subsidiaries and affiliates (or any of them).

About Accenture

Accenture is a global professional services company with leading capabilities in digital, cloud and security. Combining unmatched experience and specialized skills across more than 40 industries, we offer Strategy and Consulting, Interactive, Technology and Operations services—all powered by the world's largest network of Advanced Technology and Intelligent Operations centres. Our 674,000 people deliver on the promise of technology and human ingenuity every day, serving clients in more than 120 countries. We embrace the power of change to create value and shared success for our clients, people, shareholders, partners and communities.