

Accenture Code of Business Ethics

Executive Sponsor:

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Accenture Code of Business Ethics

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I. Introduction

Our Core Values

The Code of Business Ethics reflects and builds upon Accenture's core values:

- **Client Value Creation**
- **One Global Network**
- **Integrity**
- **Stewardship**
- **Best People**
- **Respect for the Individual**

Accenture is grounded in a set of core values that we have long embraced and consistently strived to implement in our daily work. These core values have served as a compass to guide our decision making at a company and individual level. Together, we have put these values into practice and have built a deeply skilled, world-class, global company. Our ongoing commitment to these values is necessary to ensure that we will operate with the highest ethical standards and achieve our vision:

to become one of the world's leading companies, bringing innovations to improve the way the world works and lives.

The Accenture Code of Business Ethics describes and reinforces conduct that is based on our guiding core values, consistent with our policies and practices, and essential to Accenture's legal and regulatory compliance obligations. In the Accenture Policies website, the Code provides direct links to underlying Accenture policies, which continue as always to offer detailed ethical, legal and policy guidance. The Code does not link to or reference all policies contained in the Accenture Policies website, but highlights and reinforces key areas of ethical and legal conduct, which are central to our business activities and essential to us as representatives of Accenture.

Each of us has a duty to become familiar with the issues of ethical conduct and legal compliance covered here and to abide by these principles and our policies in all of our business relationships and activities. Any waiver of the Code for any member of the Executive Leadership Team or Board of Directors may be made only by the Board or a committee of the Board, and will be promptly disclosed to shareholders. Likewise, any amendment to the Code will be disclosed promptly in accordance with any applicable legal or listing requirements.

We share responsibility as Accenture people to apply the principles of our Code of Business Ethics in every decision we make affecting our people, our clients and Accenture. We also are each responsible for reporting violations and for protecting from retaliation those who report their concerns.

II. Clients and the Marketplace

Accenture strives to **create value** for its **clients**. In so doing, it is essential that we conduct our business activities in a manner that is lawful and fair, with the highest level of **integrity**, to our people, our clients, other stakeholders and our communities.

Client Value Creation

Accenture commits to provide quality service to its clients—collaborating with them to shape opportunities that are value-driven, placing their interests first and providing excellence in delivery.

Policy 17

Competition and Fair Dealing

Accenture abides by all laws and regulations that promote fair and open competition among companies, including the U.S anti-trust laws, the European Union competition laws, and similar national laws in other countries. In no case will Accenture engage in activity that has the effect of restraining competition, such as agreements to fix prices.

Policy 1327

While Accenture people are encouraged to compete vigorously in the marketplace, each person must conduct our business affairs in a fair and lawful manner and avoid all forms of deceptive conduct or unfair advantage through manipulation, concealment, misrepresentation of material fact or otherwise.

Treatment of Competitors

Accenture will always compete aggressively, but will treat its competitors fairly. Accenture will market its services and solutions on their merits and will not disparage or provide misleading information about its competitors.

While gathering information about Accenture's competitors is a legitimate business activity when done lawfully and ethically, it is never appropriate for Accenture people to obtain information about a competitor through improper means, such as misrepresenting one's identity, inducing an employee of the competitor to divulge confidential information or gaining improper access to a competitor's confidential information, directly or through third parties.

Protection of Client and Third-Party Information and Intellectual Property

Policies 51, 57, 59, 69 and 110

Accenture expects all of its people to take appropriate measures to protect copyrighted or licensed information as well as any confidential or otherwise protected information of our clients and other third parties. This includes understanding and abiding by any applicable contractual restrictions Accenture has agreed to follow with its clients or other third parties. We should not discuss, disclose, copy or otherwise use any copyrighted, licensed, or confidential client or third-party information without proper authorization from the owner and then only as authorized and required in our duties with Accenture. Accenture people may not use copyrighted, licensed, or confidential client or third-party information for personal or other gain or advantage, or to advance the interests of Accenture, except where specifically authorized by Accenture and the affected client or third-party. It is the responsibility of each of us to take appropriate precautions to make sure unauthorized people do not have access to or use such information. In addition, our people should not use third-party copyrighted, patented, or otherwise protected materials without proper authority.

Government Contracting

Throughout the world, Accenture provides services to government entities at all levels. Almost every country or jurisdiction in which Accenture conducts business has laws and regulations setting forth procedures and requirements for contracting with the government. Accenture is committed to complying with all applicable government contracting laws and regulations. All Accenture people who serve government clients are responsible for understanding the legal requirements and restrictions that apply to such work.

Accurate Invoicing

Accenture people responsible for creating client and other third-party invoices must use utmost care to prepare accurate invoices. Each and every invoice Accenture issues should be based upon accurate and complete information and should be in compliance with the underlying contractual arrangements.

Gifts

Policies 32 and 76

Accenture expects that there may be occasions where offering or receiving social amenities or exchanging business courtesies is appropriate to foster goodwill and enhance business relationships (for example, meals and entertainment with private commercial entities that are reasonable and directly linked to the development of Accenture business and otherwise in accordance with Accenture policies).

Accenture places primary reliance on the good judgment and good taste of its people. In any situation where there is a question, one should always disclose the situation and consult others. However, no gift, money or anything of value may be offered, given or received, if it is:

- (a) In violation of the policies or regulations of the other organization (appropriate Accenture leadership is responsible for understanding those policies and regulations and communicating them to their teams);
- (b) Exchanged with the intent or purpose of receiving a comparable benefit in return;
- (c) Not recorded properly in accordance with Accenture's expense and reporting policies;
- (d) Illegal; or
- (e) Otherwise in violation of Accenture policies.

In no event does Accenture authorize or condone commercial bribery (In certain Accenture functional areas, such as procurement, more stringent policies may apply).

III. Professional Conduct

Accenture is committed to appropriate, professional conduct in the workplace and in our work-related activities. Our professional conduct is an integral part of Accenture's image and business impact in the world at large. It is grounded in our core values of **integrity, stewardship, best people** and **respect for the individual**.

Meritocracy

Policy 78

All Accenture people have the right to be treated equitably and to work in an environment that is free from unlawful or unfair discrimination. To achieve this goal, our people have the responsibility to respect the rights of fellow Accenture people by supporting and promoting the principles of meritocracy. This means that career decisions will be driven by an individual's talents, skills and ability to perform workplace responsibilities as well as business need. Accenture is likewise committed to preserving and enhancing diversity within the organization.

Anti-harassment
Policy 85

Harassment in any form based on sex, race, age, national origin, disability, religion or any other category protected by law is not only offensive, but may expose Accenture to legal liability. It could seriously undermine the integrity of Accenture's professional environment as one in which all of its people may grow and succeed as much as possible. Such harassment, which can take the form of verbal comments, physical touching or other inappropriate conduct, is not acceptable in or arising out of the work environment and is not condoned or permitted.

Personal Relationships
Policy 86

Accenture makes substantial efforts to avoid any risk of compromising its professional objectivity and its reputation. Therefore, it is inappropriate for our people to have a personal relationship beyond friendship with those who are subject to their supervision or with whom they have a reporting relationship, or with any outside party with whom they have dealings as a representative of Accenture (this includes clients, contractors, alliance partners and/or vendors).

Maintaining a Safe Workplace
Policies 13 and 85

Violent conduct or threats of violent conduct among Accenture people, clients or others are never appropriate and will not be tolerated. Anyone who engages in such conduct in the workplace; brings harmful or threatening materials into any workplace; or otherwise engages in such conduct outside the workplace, will be subject to appropriate disciplinary action.

Accenture endeavors to avoid unsafe working conditions that could affect Accenture people, regardless of who owns the worksite. Any unsafe condition should be immediately reported to a supervisor or to the appropriate local Accenture security official. In addition, for the safety and health of Accenture employees and others, employees and their clients/guests who are present at Accenture facilities are required to be familiar with and follow all safety and emergency procedures posted or adopted by Accenture, including Accenture's crisis management policy. Accenture people must also be familiar with and follow the safety and emergency procedures applicable to them at client sites.

Prior Employment Obligations	Accenture respects the continuing obligations that new and prospective Accenture people may have to a prior employer. These may include restrictions on use or disclosure of confidential or proprietary information or restrictions on the incoming employee's services.
Policy 114	Accenture expects all of its people to uphold their contractual, confidentiality and fiduciary obligations to their prior employers and to notify Accenture immediately if they believe any job activity may conflict with such obligations. Accenture requires that all incoming employees resolve any such impediments to their employment and staffing with Accenture before beginning employment.
Data Privacy	Accenture is committed to respecting and protecting the legitimate interests of its people and third parties in the privacy of their personal data. Many countries in which Accenture operates have specific laws and regulations dealing with the treatment of personal data. The European Union, in particular, has enacted very complex and detailed data privacy laws. Accenture has adopted Policy 90, which all Accenture people are required to follow.
Policy 90	
Internet, E-mail and Voice Communications	Accenture people must exercise good judgment and act in a professional manner whenever using Accenture e-mail or accessing the Internet or any other external electronic system using Accenture information technology resources. This expectation also extends to activities on client systems or with client-provided access. All communications relating to Accenture business or using Accenture's information technology resources are company property and must conform to Accenture's guidelines for acceptable use of the Internet, e-mail, voice communications and similar electronic media systems. Our people may not use Accenture or client information technology resources to take or damage the intellectual property rights of third parties, including through any Internet peer-to-peer, file-sharing or other downloading services.
Policies 72, 102 and 1169	
Personal Activities	Accenture people may not participate in outside activities that may have a negative impact on the performance of their job, conflict with their obligations to Accenture, or otherwise reflect adversely upon Accenture's business, image or reputation. Just as in our business activities, our personal activities must be undertaken with the utmost integrity. This principle extends to how we conduct our personal financial and tax affairs, and requires that we do so in a manner that does not adversely impact the business, image or reputation of Accenture.

IV. Protection of Accenture Assets

Accenture people are expected to use the highest level of care to safeguard, protect and enhance the assets of Accenture, and use them only for legitimate business purposes, consistent with our core values of **stewardship** and **integrity**. Such assets include all physical property of Accenture as well as intangible property, including our brand, all forms of intellectual property and our reputation.

Accenture Name and Brand

Policies 34, 74, 127, 1119, and 1120

The Accenture name and brand identity are powerful and valuable assets that differentiate us from our competitors. Our words and actions as Accenture people and the business decisions Accenture makes must support and advance Accenture's name, brand identity, brand positioning and personality. We go to market with one global brand, and we must treat the Accenture name and brand in all activities and transactions in a globally consistent manner. No rights to use our name or brand should ever be granted to third parties except with appropriate approvals and in accordance with naming and brand policies.

Accenture Intellectual Property

Policies 91 and 110

Accenture expects its people to protect and help develop its intellectual property. In keeping with that philosophy, Accenture endeavors to protect to the greatest extent permissible, in engagement contracts or otherwise, its intellectual property rights. Similarly, Accenture will aggressively seek appropriate protection of its intellectual property, including copyright and patent protection. All work-product of Accenture people created during their employment with the company and relating to Accenture's present or future business is the exclusive property of Accenture. All our people are expected to help identify and secure protection for these innovations.

**Accenture
Confidential and
Proprietary
Information**

**Policies 57, 69, 83
and 1253**

All Accenture people have a personal responsibility to protect Accenture confidential and proprietary information against disclosure and improper use. It is especially important in our electronic environment that Accenture people take all necessary measures to prevent unauthorized disclosure of such information, including maintaining strict adherence to our information security policies, communication policies, and agreements governing proper use or disclosure. Our people may only disclose such information with proper authority to those with a need to know, or pursuant to legal mandate with approval and assistance from Legal & Commercial. Generally speaking, confidential and proprietary information includes any information or material, not generally available to the public, generated, collected or used by Accenture that relates to its business, research and development activities, clients or people. Our people should never use confidential Accenture information for personal gain or advantage.

Obligations with respect to Accenture's confidential and proprietary information continue to apply even after association with Accenture ends.

**Accenture
Computer
Hardware and
Electronic Device
Protection**

Policy 57

Accenture people are responsible for protecting the computer hardware and other electronic devices issued to them from theft or use by unauthorized persons, by following all recommended security practices. It is the responsibility of each of us to keep our assigned equipment within our control or to exercise appropriate safety precautions to secure and protect our equipment when unattended in accordance with all recommended security measures to prevent unauthorized access by others to such equipment.

**Financial Integrity
and Reporting**

**Policies 48, 154,
155, 284, 705, 919,
1188 and 1227**

Accenture requires compliance with Generally Accepted Accounting Principles and Accenture's system of internal accounting and auditing controls. Our people must maintain and present Accenture's accounting and financial records, as well as reports produced from those records, in accordance with the laws of each applicable jurisdiction. These records and reports must accurately and fairly reflect, in reasonable detail, Accenture's assets, liabilities, revenues and expenses. All transactions must be recorded accurately using the proper charge number and in the proper accounting period and be supported by reasonably detailed documentation.

Time and Expense Reporting

Policies 63 and 800

All Accenture people are responsible for submitting timely, accurate and complete time and expense reports, in accordance with Generally Accepted Accounting Principles, Accenture's policies and country regulations, using the time and expense reporting tools designated in each country. Our people are responsible for all time and expenses reported—even if the time report is completed on their behalf by someone else—and they must submit the required documentation, in accordance with local policies, laws and regulations.

Purchasing and Payments

Policies 104 and 1327

To ensure effective business and financial control of Accenture's expenditures, appropriate approval and authorization must be obtained for purchasing commitments and invoice payments made by Accenture. This process ensures that the appropriate people will review decisions to commit the company to incur expenditures, that the business expense is valid, that goods or services have been received to the required specifications, and that the invoice meets legal requirements and is otherwise compliant with our purchasing policies. None of our people may knowingly cause or direct Accenture to purchase goods or services of any kind, for itself or for clients, from vendors owned or controlled by relatives of Accenture people.

Accenture should purchase goods and services only on the merits of price, quality, performance and suitability. We will not enter into any improper or illegitimate transactions, or transactions that have the appearance of impropriety or illegitimacy, or that are intended in any way to misrepresent the accounting reports or results of any party to the transaction.

**Archives and
Records
Management**

Policies 83 and 123

Accenture will manage its archives and records to leverage its knowledge capital, maximize its intellectual property assets, and achieve its business objectives. Further, Accenture shall maintain, manage, store, and dispose of its archives and records in compliance with its contractual obligations and applicable legal and regulatory requirements, such as tax or data privacy laws, which may vary by jurisdiction.

Retention of company records, such as tax materials or documents that are required in legal proceedings, may be required for compliance with applicable laws. Also, destruction of records that relate to disputes or legal proceedings matters may be improper and even unlawful.

Accenture people must contact Legal & Commercial immediately whenever they have notice that litigation or any government investigation is threatened or initiated against Accenture, to allow proper preservation of documents that might otherwise be subject to routine destruction under Accenture's records management policy. Accenture prohibits the unlawful destruction or alteration of any materials relevant to such an investigation or litigation. Once Legal & Commercial receives notice of threatened or actual litigation or an investigation, it will notify the appropriate Accenture people and direct that relevant categories of records be retained until further notice.

Conflicts of Interest; Corporate Opportunities

Policies 15, 32, 61, 76, 827 and 1200

All Accenture people must avoid any situations that hold the potential for anyone to act in a way that is not in the best interests of Accenture. We should endeavor to avoid even the appearance of a conflict of interest. In no event, should Accenture people use their position, knowledge of Accenture or contacts for personal gain. It is not possible to identify all situations that could create a conflict of interest or the appearance of one; Accenture places primary reliance on the good judgment and integrity of its people. In any situation where there is a question, one should always disclose the situation and consult with others.

All Accenture people are responsible for ensuring that their personal interests, investments and activities (including those of family members) do not conflict with their objectivity or independent judgment, or Accenture's best interests or any other obligations to clients or Accenture.

None of our people shall make decisions for or recommendations to Accenture concerning third parties (whether clients, alliance partners, venture portfolio companies, vendors or others) in which they have any direct or indirect financial or other interest without full, prior disclosure of such interest to an appropriate member of the management team. (For senior executives, the disclosure must be to a member of the Executive Leadership Team. With respect to any member of the Executive Leadership Team, the disclosure must be to the Board of Directors.)

Accenture people may not take for themselves opportunities that are discovered or created through the use of Accenture property, information, relationships or position, nor use them for personal gain. All Accenture people have a duty to advance the legitimate interests of Accenture when the opportunity to do so arises.

V. Accenture as a Local and Global Citizen

As part of being **one global network** acting with **integrity**, every Accenture person must understand that Accenture is committed to being a good local and global citizen.

Compliance with All Laws

Accenture and all of its people will comply with all applicable laws throughout the world.

Policy 108

Improper or Questionable Payments

Policy 1327

Accenture people will not make, promise to make, offer, or authorize any unlawful, improper, or questionable payments or commitments of company funds to clients, vendors, government officials or agencies, government employees, political parties or candidates, or any other entities or individuals anywhere in the world for the purpose of obtaining or retaining business or securing any improper advantage, directly or indirectly. In addition, Accenture prohibits any undisclosed, unrecorded or falsely recorded transactions as well as any payments made for other than their intended purpose.

In any case where our people may have questions about the propriety of a payment, gift or benefit, they must obtain advance approval from a client group managing director in conjunction with the Legal & Commercial Group.

Insider Trading

Policies 1216, 76 and 1253

Many countries have laws prohibiting the use or disclosure of material, non-public or "insider" information —information that is generally not available to the public and that could, if publicly known, affect the market price of the securities of Accenture, a client or another third party. Generally speaking, if that information is "material," meaning that it is information a reasonable investor would likely consider important in deciding whether to buy or sell securities and that could affect the price of the security, then Accenture people possessing it may not buy or sell Accenture's securities (or the client's or any third-party's securities) nor provide that material information to others, until such time as the information becomes public.

Immigration

Policy 43

Accenture complies with the immigration laws of the locations in which its people are working. All people hired by Accenture must possess valid and current authorization to work in their country of employment. Our people working outside of their home country must obtain all appropriate visas and work permits required by law prior to arrival in the host location.

Export Control Laws and Boycotts	Accenture will comply with applicable export control and anti-boycott laws and regulations in the countries within which Accenture operates. Export control laws may restrict the export or re-export of goods, software and technology that originate in a country in which Accenture operates. Export law may also restrict shipments of certain foreign-made products incorporating Accenture technology and software as well as transfers of controlled technology to certain foreign nationals, whether in the local country or abroad.
Policy 1283	Anti-boycott regulations may prohibit Accenture from participating in certain activities. Examples of these types of activities are: requests or agreements to refuse to do business with certain countries or companies, to provide information about business relations with certain countries or companies or to discriminate against, or provide information about, individuals or companies on the basis of race, religion, gender, national origin or nationality. In some cases, Accenture may be required to report to the government situations in which we are requested to participate in any of the foregoing. Accenture will comply with all applicable regulations of this nature.
Sanctions and Embargoes	Accenture will comply with applicable laws and regulations related to sanctions and embargoes imposed by countries within which Accenture operates. Various governments have programs of economic and trade sanctions against certain countries, terrorists, terrorism-sponsoring organizations, entities involved in the proliferation of weapons of mass destruction, and international narcotics traffickers. In some cases, even an indirect facilitation of a transaction is prohibited.
Policy 1254	
The Environment	Accenture is committed to the protection of the environment and will comply with all applicable environmental laws and regulations of the countries in which it conducts business.
Public Disclosures	Accenture is committed to full, fair, accurate, timely and understandable disclosure in reports and documents filed with or submitted to the U.S. Securities and Exchange Commission and in other public communications it makes.

Political and Charitable Contributions and Activities

Policies 99, 1318 and 1221

The law in many countries sets strict limits on contributions by corporations and government contractors to political parties and candidates, and violators are subject to very serious penalties. Because of the complexity, variability and severity of laws governing corporate political activities, Accenture, its people and agents will not engage in any corporate political activities without first obtaining written consent from Accenture's Office of Government Relations (or other approvers defined in applicable policy) and, in all cases, only for proper and legal purposes. Our people remain free, however, to make personal political contributions in their personal capacity as they deem appropriate; in no event will Accenture reimburse such expenditures. Cash or in-kind contributions to political candidates and organizations using Accenture resources are prohibited.

The company, however, does not endorse political activities that any person undertakes as a private individual. Use of the Accenture name to endorse a political activity or event is not permitted.

Accenture supports community involvement by its people as private individuals. Use of the Accenture name to endorse a charitable organization or event, is not permitted without prior approval by an appropriate member of the management team.

Lobbying and Dealing with Government

Policies 1221 and 1327

Communications with federal or national, state or provincial, or local officials and their staff by Accenture people or retained consultants may result in an obligation on Accenture to register as a lobbyist or employer of a lobbyist or the need to comply with other regulatory requirements in various jurisdictions. In addition, contact with U.S. government officials by non-U.S. citizens may require registration under the Foreign Agents Registration Act. Before contacting government officials on behalf of Accenture or its clients, our people should obtain the approval of the Office of Government Relations.

VI. Our Responsibility

As employees of Accenture, we acknowledge that violating any of these principles, including our obligation to report violations or to cooperate in any investigation of suspected violations, breaks our trust with Accenture and our clients and opens us to individual disciplinary action, including termination, and perhaps to legal liability. All Accenture people are expected to become familiar with this Code and Accenture's policies and must comply with them at all times. Please note that nothing in this Code constitutes a contract of employment with any Accenture person.

Each of us is responsible for being alert and for reporting any violations or suspected violations of these principles either through normal reporting relationships, to any member of management or through the Accenture Business Ethics Line described below.

Important information regarding any reports originating from France: Due to recent legal and regulatory developments in France, and until further notice, anyone who desires to report any violations or suspected violations of the Code of Business Ethics in France is advised to use the usual reporting channels and means or contacting any member of management, rather than the Business Ethics Line or the e-mail address of the Compliance Program.

All Accenture people are encouraged to report any potentially unlawful, unethical, or fraudulent activity, including any concerns about questionable accounting or auditing matters, or any other activity that causes them concern, and should rest assured that such reporting will not be the basis for retaliation or other disciplinary action. (Policy 301)

Each of us certifies our compliance with this Code when we file our time reports. We also may be asked periodically to certify our compliance with this Code or various specific policies.

This Code shall also apply as appropriate to members of our Board of Directors and others as they act on behalf of Accenture.

VII. Where to Go for Help

In the event that you have questions about the Accenture Code of Business Ethics, any Accenture policy, or whether past or contemplated conduct may present ethical or legal issues, a number of resources are available. Depending on the circumstances, you may want to discuss the issue with a direct manager, a Human Resources representative, or a member of the Legal & Commercial Group. Alternatively, questions may be sent to Legal & Commercial at "compliance.program@accenture.com." Also, the Ethics and Compliance Homepage offers a convenient, single-source gateway to information about Accenture's Ethics and Compliance Program, including this document, at <https://mylearning.accenture.com/?sitemapkey=ETH> ETC. Whenever in doubt, you should consult.

To allow for the reporting of any ethical concerns directly and, if desired, on an anonymous basis, Accenture has set up the Accenture Business Ethics Line. This service is operated by an outside agency on our behalf, to receive and pass on reports to an appropriate person within Accenture for investigation and follow up. You may access the Accenture Business Ethics Line by phone 24 hours a day, seven days a week, by dialing (or calling collect) +1 312 737 8262. Alternatively, you may submit your concern to the Business Ethics Line via a dedicated, encrypted website at URL <https://businessethicsline.com/accenture>.

In addition to the foregoing mechanisms, you may direct any concerns about our business ethics or conduct, securities laws and regulations, accounting standards, or Accenture's financial statements, accounting practices, internal accounting controls, or auditing matters to the Chairman of the Audit Committee, in care of the General Counsel and Secretary at "Office of the Company Secretary@accenture.com".

This Code of Business Ethics is part of Accenture's Ethics and Compliance Program, adopted under the auspices of our Board of Directors and directed by our Compliance Officer (currently the General Counsel and Secretary) under the oversight of the Audit Committee of the Board.