



# Conflicts of Interest Policy

Capita plc recognises that, in the normal course of business, and to comply with applicable legal and regulatory requirements, there is a requirement to identify and manage conflicts of interest. This maintains the trust and confidence of Capita's stakeholders across all operations.

## We are committed to

- Avoid putting ourselves in a position whereby our own interests, or our duty to any persons on behalf of whom we are acting, conflict with our duty to clients, customers, employees and companies in the Capita group.

## What you should expect from us

- Fair, confidential and sensitive handling of any conflicts of interest that might arise.

## What we expect from you

- Be aware of the potential for conflicts of interest to arise in a wide variety of roles, arrangements and circumstances.
- Be familiar with any applicable supplementary standards and procedures (e.g. to statutory directors of Capita subsidiary companies or to Capita's financial services businesses).
- Be transparent about arrangements that might be construed as a conflict of interest under this policy or related standards.
- To speak up if you face a situation where you are not sure what to do or have a concern in relation to this policy.

- Our **Speak Up Policy** sets out the channels available to you and no action will be taken against you if you report a genuine concern whether any concerns are proven or not.

## How we will achieve this

- Implementation of a mechanism for the reporting and authorisation of conflicts of interest.
- Internal publication of guidance on handling potential or actual conflicts of interest in specific situations.

## Claire Denton

Chief General Counsel & Company Secretary  
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