



## Financial Crime Policy

Capita is committed to protecting our business, and clients from financial crime. To do so we must ensure that we have effective and proportionate controls in place to counter the risk that Capita and its products and services may be used to enable or facilitate financial crime.

This Policy sets out our commitment to manage and mitigate financial crime risks and what we expect from our employees and those performing services for, or on behalf of, Capita. all of whom have a responsibility to meet or align to the requirements set out in this policy and the associated policy standards.

### We are committed to

- Setting the tone from the top. Fostering and demonstrating effective behaviours, attitude, and a positive compliance culture.
- Operating in accordance with all applicable laws and regulations, in the jurisdictions in which Capita operates.
- Taking appropriate steps to identify, manage and mitigate the risks to which Capita is subject to and implement proportionate systems and controls.
- Ensuring the risk framework is supported by good governance, oversight, transparency, and assurance to manage ongoing risks.

### In line with our

- Code of Conduct.
- Financial Crime Standards, which set out the mandatory requirements which must be followed by our businesses and any relevant person who provides services for or on behalf of Capita in the areas of:

- Anti-money laundering and countering terrorist financing.
- Fraud.
- Sanctions.
- Prevention of the facilitation of Tax Evasion.
- Anti-Bribery and Corruption.

### What you should expect from us

- Maintaining a risk management framework that will establish accountabilities and responsibilities, risk assessments, oversight arrangements and good governance.
- Establishing financial crime standards that will drive compliance to this policy and our legal and regulatory obligations.
- Implementing minimum controls across Capita designed to deter, detect, and disclose, where appropriate, to the relevant authorities.
- Advising and supporting Capita businesses in a way that raises awareness of financial crime

risk and helps them avoid policy, legal or regulator breaches.

- Developing business wide training and where required enhanced or tailored training.
- Supporting Capita businesses with third party risk management including onboarding, screening, risk assessment, ongoing monitoring, and oversight.

#### **What we expect from our people and businesses**

- Align to the commitments of this policy and embed effective procedures and processes to meet the mandated requirements of the Financial Crime standards.
- Establish oversight arrangements to monitor ongoing risk management and the effectiveness of controls within your business area.
- Complete all financial crime training that applies to you.
- Immediately report any suspicion of financial crime in line with our SpeakUp policy or Suspicious Activity Reporting (SAR) process.
- Immediately report breaches of policy or standards through Capita's defined governance mechanisms.

#### **What we expect from our third parties**

- We expect that our suppliers, agents and other third parties providing services for or on behalf

of Capita align with the relevant principles of this policy and supporting standards.

#### **How we will achieve this**

- The Executive Team are responsible and accountable for ensuring the requirements of this policy are adhered to and embedded within their respective divisions and functions
- Our management teams are supported by our Financial Crime and Legal teams who provide expert counsel and challenge to support decision making and the investigation of concerns raised in relation to this policy.
- We take policy non-compliance very seriously. Exceptions and breaches are reported and managed through our governance mechanisms, which include our Risk and Audit Committees.



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