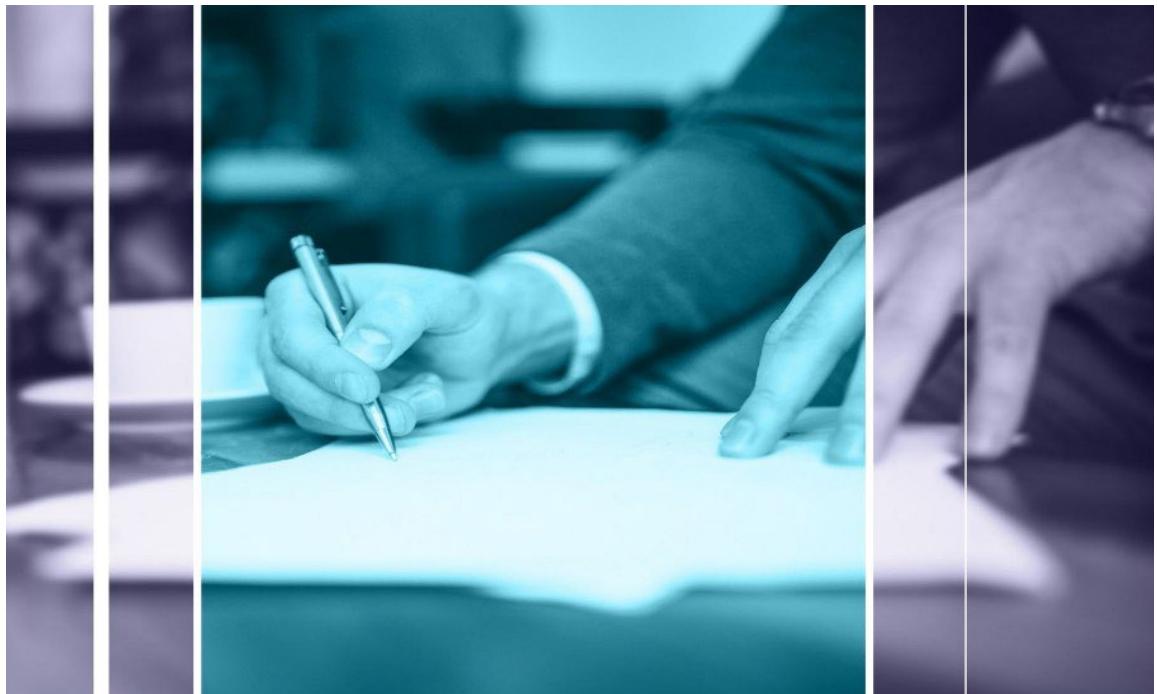


Code of Conduct



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Why The Code Matters

Team Capita,

Our Code of Conduct is there to support us on the decisions we make each and every day working for Capita.

It steers us in the right direction to delight customers and helps us work together, as one team, to exceed expectations.

It governs our values and ethics and drives our behaviours in everything we do to ensure we have trust. We must always do the right thing, with integrity, to help us succeed and grow as a company.

The Code applies to everyone who works at, or with Capita – employees, contractors, and suppliers. Please take some time to read and understand the Code and role model the behaviours with others.



We must all work together and be responsible for how we act, using our values when making decisions. The Code sets the standard for us all, how we treat people and how others should treat us, not matter what geography we work in.

There will be other policies you will follow, depending on different legislation or markets we operate in which will underpin the Code, but this is the benchmark for us all.

If you ever need to seek clarity, please go back to the Code, or if you hear or see anything that you believe may contradict our values and behaviours, please speak up. You can use the confidential and independent Speak Up service, or if you feel comfortable, please speak to your manager, a senior manager or your HR business partner.

It's important we all work together as one team and follow the Code to delight our customers.

Thank you

A handwritten signature in black ink, appearing to read 'Adolfo'.

Adolfo, CEO

About the Code

1

The Code builds on Capita's purpose, values, behaviours, and leadership commitments.

2

It summarises key policies and procedures to guide decision-making and conduct.

3

It applies to everyone working for or with Capita, including contractors and suppliers

4

Capita holds itself to standards often higher than legal requirements.

5

Third parties must align with the Code; failure to do so may end the partnership.

6

Breaches of the Code can lead to disciplinary action, including dismissal.

7

Everyone is responsible for upholding these standards and holding each other accountable.

What We All Must Do

Before making decisions, ask:

- Does it create better outcomes?
- Does it reflect our values and behaviours?
- Does it follow our policies and procedures?
- Is it legal, fair, and safe?
- Could it damage our reputation?
- Am I setting a good example?

How We Act

Our purpose – **we create better outcomes** - guides all we do. We may operate in different parts of Capita, and under different brands. But we remain “One Capita”, united by our common purpose and values.

Here is a reminder of our values – the guiding principles that drive our behaviours, shape our culture and help determine our strategic direction:



Our Values



Customer first, always

We prioritise our customers in everything we do, working hard to exceed their expectations with exceptional service.



Fearless innovation

We love bold ideas and adopt the best solutions to continuously improve, working at pace to serve our customers and communities better.



Achieve together

We believe in the power of collaboration and being open, working together, holding each other to account to reach our shared goals.



Everyone is valued

We create a welcoming and inclusive environment where everyone feels valued and empowered to succeed.

We innovate boldly, to grow better together...



To help bring our values to life and translate them into the positive actions and behaviours, we must all comply with our [**Colleague Playbook**](#). This sets out how we all need to contribute and behave to positively demonstrate our values in our day to day working lives.

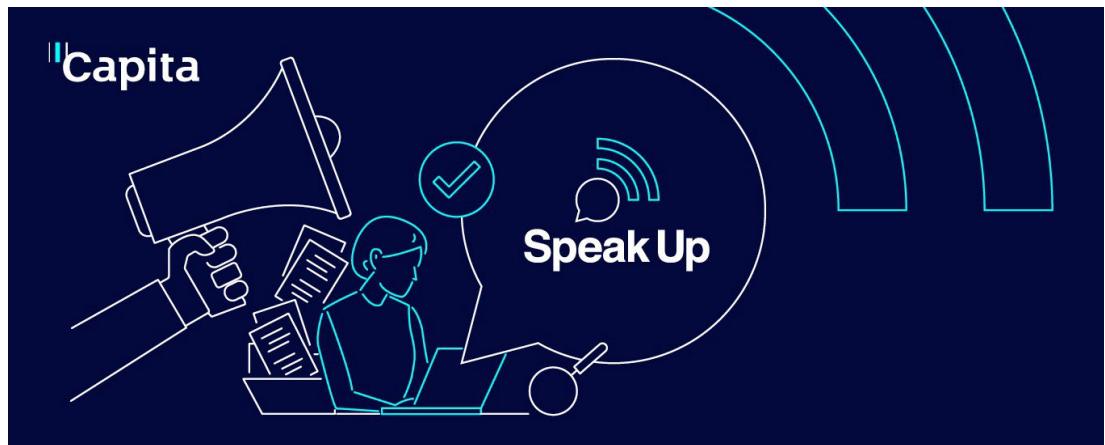
If you are a manager, you also need to:

- Ensure you and your team has read and understood the Code.
- Hold yourself and your team to account in acting in accordance with the Code as underpinning our values and behaviours.
- Be a role model.
- Make sure your team feels they can [Speak Up](#) if they have concerns, in confidence and without fear of reprisal.
- Comply with the [**Leadership Playbook**](#).

Recognition and Values in Action

Capita's global recognition platform, **Celebrate!** enables colleagues to easily acknowledge and appreciate the contributions of others across all levels and roles. Built around our values, **Celebrate!** showcases the everyday actions that represent Capita at its best. By making recognition simple and accessible, **Celebrate!** helps embed our values into daily working life and supports our shared commitment to creating better outcomes.

You can access [Celebrate! here](#), it is also accessible via 'My Apps' and 'The Hub.'



If you face a situation where you have a concern that the Code is not being followed or our values and behaviours are not being properly demonstrated, you must report it.

We must show the courage to challenge actions, decisions, or behaviours that we believe to be wrong. No action will be taken against you if you raise a genuine concern, whether proven or not.

If you have an employment related question or grievance, it may be more appropriate to use the grievance procedure.

Our [SpeakUp Policy](#) sets out the channels available to you to do so.

You should raise a concern under this policy using:

Whispli, our confidential, independently operated, SpeakUp helpline and website.

Whispli can be accessed at <https://capita.whispli.com/speakup>.

Whispli, the confidential Speak Up provider, will initially notify Capita's Business Integrity Team who will investigate the matter.



We are committed to

- Promoting an open and transparent culture across our businesses which encourages any person to speak up if they see or reasonably believe misconduct is occurring or is likely to occur.
- Operating a non-reprisal policy, where a person raises a concern in good faith, whether the concern is proven or not.
- Respecting the confidentiality of any person raising a concern. We will not divulge the personal information of anyone raising a concern unless we are required to do so by law or to meet our regulatory or professional obligations.

What can be reported as a Speak Up

- A criminal offence, failure to comply with a legal obligation or miscarriage of justice.
- Breaches of our Code of Conduct or related policies, standards, procedures, and guidance, including any applicable industry or professional code.
- Improper conduct or unethical behaviour or behaviours which are not in accordance with our Values.
- Dangers to health and safety or the environment.
- The deliberate concealment of information about any of the above.
- Retaliation against those raising concerns.

What you should expect from us

- We will protect any person who raises a concern from being at risk of losing their role or suffering reprisal as a result of raising a concern.
- We will not tolerate the harassment or victimisation of anyone raising a concern or any attempt to influence a person into not raising any such concern.
- Any such behaviour is a breach of our code of conduct and, if upheld, could result in disciplinary action against the perpetrator which may lead to dismissal.
- To keep any person who raises a concern under this policy informed of the steps we will take to review the matter and the outcomes of our review where we are permitted to do so.

What we expect from you

- To speak up if you have a concern under this policy. Do not wait for proof or assume someone else will report the concern. They may not! We want you to raise the matter while it is still a concern.
- To use the channel set out in this policy to do so.
- Not undertake investigation on your own, unless authorised by the Business Integrity Team.

What we expect from our managers

- To listen to, acknowledge and support any person who raises a concern to you in accordance with this policy and our manager commitments, directing concerns to our Business Integrity Team (speakup@capita.com).
- To promote and help foster a workplace environment that supports any person to speak up in good faith without fear of reprisal.

If you raise a concern

- Please provide as much information as possible. Remember, the more information provided the more likely your concern can be properly investigated.
- You can remain anonymous if you wish but we would encourage you to provide your contact details so that we can inform you of the progress of our review, as well as asking for further information which may help the investigation and final outcome.

Further information

Policy Zone	Link to Policy Zone
Speak Up Policy	<u>SpeakUp Policy</u> : If you have a concern that the Code is not being followed or our values and behaviours are not being properly demonstrated
People Hub	For more details on how our employee grievance procedures work.
Contacts	Chief General Counsel Group Director, Business Integrity & Financial Crime Prevention.

Our People

We Put People First - Wellbeing and Health

Our policy overview

We are committed to creating a working environment that protects, supports, and promotes the wellbeing and health of our colleagues. Through applying the company values and commitments and engaging with our approach to wellbeing and by closely following our health policies, we will ensure that all our colleagues are happy and healthy.

We will provide fair working conditions for all colleagues including terms and conditions of employment, remuneration and benefits, working hours, freedom of association and colleague representation, health and safety, resting time, paid holiday entitlements and benefits

Our conduct

- Embrace wellbeing practices to become an intrinsic part of everything you do, taking care of yourself and your colleagues.
- Ask for help and support and encourage others to do the same should you feel it's needed.
- Actively engage with wellbeing and health promotion events and activities and utilise the information and guidance on the wellbeing hub.
- Use our wellbeing and health resources and for general information and the employee assistance programme for more detailed support services.
- Take steps to be aware of the support provided by our occupational health partners and engage with any proactive promotions.
- Take a proactive approach to looking after your own physical and mental health and wellbeing.
- Talk to a manager, an HR business partner or use our Speak Up facility if you see or experience anything that causes harm.

Further information

Policy Zone	Link to Policy Zone
Wellbeing Hub	Link to Wellbeing Hub
Contacts	Senior Health Adviser Chief People Officer

Diversity, Equity & Inclusion

Our policy overview

Diversity will strengthen Capita. We are committed to creating an inclusive, engaged and values-driven workplace where everyone has an equal opportunity to succeed. We value the diversity of thought that comes from building teams with different backgrounds and experiences. We expect everyone we work with to behave in a way that promotes inclusion and fairness, and to speak up if they see any evidence of discrimination. We commit to listening to our employees so that we continuously improve. We value human rights and treat people with dignity, care and respect. We will proactively work to create a discrimination-free workplace and do not tolerate anyone being harassed or bullied for any reason. We will recruit, promote, train, develop and reward people based on clear evidence of what they do and how they act.

Our Conduct

- We have zero tolerance for discrimination. Speak up if you experience or see discrimination, or if you see or hear anything that does not promote inclusion. We will deal with it.
- Educate yourself on inclusive practices, so your behaviour contributes to everyone at Capita feeling valued and welcomed.
- Treat others with respect, dignity and courtesy, and expect that back.
- Be open - listen and learn from colleagues- and when you disagree, avoid ridicule, criticism or causing embarrassment.
- Encourage honest and open conversations and be willing to accept, and act on, constructive feedback.
- Proactively look for opportunities to be more inclusive in how you recruit, train, mentor and develop others,
- Evaluate and compensate performance on the basis of how objectives are met, as well as what is delivered.

Further information

Policy Zone	<u>Link to Policy Zone</u>
Contacts	Chief People Officer

Anti-Racism, Discrimination and Harassment

Our policy overview

We treat people with care and respect and work collaboratively to create a positive and respectful working environment. We take a zero-tolerance approach to all forms of abuse, racism, discrimination, harassment and bullying of all employees, contractors, customers, suppliers, and candidates within our recruitment process, or anyone else that Capita comes into contact with. We do not tolerate abuse, harassment, bullying or discrimination of employees, contractors, customers, suppliers, or anyone else we deal with. It is zero tolerance at Capita when it comes to any form of discrimination.

Our conduct

- Be mindful of how your words and actions affect others. Choose kindness and respect in every interaction.
- We have zero-tolerance for bias, bullying or harassment. If something makes you feel uncomfortable, it's not acceptable -Speak Up.
- If you witness or experience or see discrimination, report it. We are committed to addressing all concerns in line with our Anti- Racism, Discrimination, Harassment and Bullying Policy and Procedure.

Further information

Policy Zone	<u>Link to Policy Zone</u>
Contacts	Your local HR Business Partner Chief People Officer Chief General Counsel

Drugs

Our policy overview

We do not tolerate the sale or distribution of illegal substances or misuse of drugs including alcohol.

Our conduct

- We do not misuse alcohol or drugs.
- We do not attend a Capita workplace whilst under the influence of alcohol or drugs.
- We must not be in possession of or consume drugs whilst at work.
- We must not be in possession of or consume alcohol whilst at work unless attending an approved company-organised event
- We must not sell or buy alcohol or drugs in any Capita workplace.
- We alert a manager or HR business partner about colleagues we think might be under the influence of drugs or alcohol at work, or we use the Speak Up facility. We actively support any colleague who we think might have a drug or alcohol misuse problem.
- We encourage colleagues who may have a drug or alcohol problem to use our Employee Assistance Programme where possible.

Further information

Policy Zone	<u>Link to Policy Zone</u>
Contacts	Your local HR Business Partner Chief People Officer Chief General Counsel

Health, Safety, Environment and Safeguarding

Our policy overview

Health, Safety and Environment (HSE), at Capita is a priority, and we are all responsible for our own health and safety as well as, where appropriate, ensuring the health and safety of colleagues, contractors, and others. We must cooperate with Capita's policies and procedures that apply to us and are there to protect us. We must also adhere to legislation and ensure our contractors and visitors follow our policies and procedures.

Our conduct

- We provide a safe and healthy working environment along with policies and procedures that enable us to comply with relevant legislation.
- We manage the risk associated with our activities and provide appropriate control measures to reduce this risk, to as low as reasonably practicable.
- All employees and managers must complete the necessary HSE training, and colleagues will have the appropriate equipment to complete tasks safely.
- All accidents and incidents must be reported to enable us to investigate, learn and reduce the risk of re-occurrence. Some accidents may need to be reported to the regulatory body.
- Colleagues must raise any health and safety concerns with their line manager in the first instance but can also seek assistance from their HSE Champion or HSE Lead or by using the Speak Up facility.
- We recognise that a work/ home balance aids overall health, wellbeing, and productivity.

Our policy overview – Safeguarding

Safeguarding at Capita provides protection for children and vulnerable adults including our Colleagues and others who come into contact with us during work related activities. To ensure we all are fully protected we must adhere to our Safeguarding framework:

- The Capita Safeguarding Standard is the centre of the Safeguarding framework and details the process, roles, responsibilities, and requirements we all need to comply with.
- All Capita employees will be required to complete safeguarding training relevant to the service their business unit provides.

- Any Safeguarding concerns must be reported to the business unit Safeguarding Representative or the Safeguarding team.
- **If the vulnerable adult or child is in immediate danger, the first Capita colleague who is made aware must contact emergency services without delay or further authorisation.**

Further information

Policy Zone	<u>Link to Policy Zone</u>
Contacts	Group Head of Clinical Governance and Safeguarding Director of HSE for Capita Public Service

Conflicts of Interest

Our policy overview

You must report any personal or professional interests or activities that could affect your ability to make objective decisions for Capita. Common examples include:

Conflicts	What you need to do
Working for another business (e.g. Board roles, consultancy, director positions)	Get approval from your line manager and agree the scope of activity.
Recruiting or managing a relative or partner.	Tell your line manager to see if alternative arrangements can be made.
Using a supplier you have a personal connection with.	Talk to your line manager before using the supplier.
Making a corporate donation to a charity you are a trustee of.	Get approval from your line manager before donating. Let Company Secretary know of any donations that are £5,000 or above.
Any ownership in another business of over 5% should be declared.	Check with your line manager if it's acceptable and, if so, inform Company Secretary.

Our conduct

- Always act in Capita's best interests.
- Step away from situations where you have a conflict of interest.
- Disclose any known conflicts in line with your local procedure and agree on how to manage them.
- Get approval from your line manager to ensure both you and Capita are protected.



Appointments and investments outside of Capita

External appointments outside of Capita can often be development opportunities. All need sign off from the business and be logged with the Group Company Secretary. Additional requirements apply where you are within a FCA regulated business or the role is in a listed company and requires London Stock Exchange (LSE) approval or notification.

Further information

Policy Zone	<u>Link to Policy Zone</u>
Contacts:	Group General Counsel

Our Business

We are dedicated to achieving better outcomes for our employees, clients, the communities we serve, and the environment. Our responsible business strategy prioritises our action through one cross-cutting theme and our company purpose: to create better outcomes for all our stakeholders, and four key themes:

1. Our People

We are committed to creating a working environment that is inclusive and protects, supports, and promotes the wellbeing and health of our colleagues. Capita fosters open and constructive social dialogue by engaging regularly with employees, employee representatives and promoting transparent two-way communication across all levels of the organisation.

2. Our Communities

We actively support our customers and communities through volunteering and fundraising initiatives, encouraging colleagues to address local socio-economic challenges by sharing their skills and experience. Every employee is entitled to one paid volunteering day per year (subject to location), empowering them to give back in meaningful ways. In the UK, we also offer matched funding and a payroll giving scheme enabling employees to support causes that matter most to them.

3. Our Environment

We are committed to using our resources responsibly and delivering services to our clients in an environmentally sustainable manner. By measuring, managing and monitoring our environmental performance, we continuously seek opportunities to improve and enhance our positive impact. We adhere to all relevant environmental laws and regulations, and actively work to prevent pollution of air, land, and water wherever possible. Across all our operations we promote environmental responsibility and empower our people to adopt sustainable practices. Our goal is to become a net zero organisation by 2045, and we have approved near and long-term science-based emissions reduction targets with the Science Based Targets initiative (SBTi).

4. Our Business

We operate as a consistently purpose-led, responsible, and ethical business. Our commitment to honesty and fairness guides our relationships with both customers and suppliers. We take proactive measures to protect individual data privacy and safeguard against data and cyber breaches. As we explore the evolving opportunities of artificial intelligence, we remain dedicated to innovating with integrity.

We believe that human rights are fundamental and universal. Every individual deserves the freedom to live with dignity, free from fear, deprivation, and discrimination, and to express their beliefs openly. We maintain a zero-tolerance stance on modern slavery, child, forced or compulsory labour, and human trafficking. We respect and uphold the rights of all employees to freely associate, join trade unions, and engage in collective bargaining in accordance with national laws and international human rights standards. Our business is guided by the principles outlined in the United Nations Universal Declaration of Human Rights (UNUDHR) and the core conventions of the International Labour Organization (ILO). We are committed to upholding these standards across all aspects of our operations and supply chains

Our conduct

- Ensure you are familiar with our Responsible Business Strategy and associated policies and procedures as it's important we are all clear about the commitments we have made and how we can contribute.
- All suppliers must adhere to our Supplier Charter, which sets out our commitments and expectations within our supply chain.

Further information

Policy Zone	Link to Policy Zone
Contacts	Chief People Officer



Our Supply Chain

Our aim is to encourage and collaborate with suppliers to uphold the highest standards across our supply chain. Through our Supplier Charter, we set clear expectations for ethical conduct, environmental responsibility, and respect for human rights. We actively seek out suppliers who share our values and commitments, and by partnering with those aligned to the Charter's principles, we strive to continuously improve the sustainability and integrity of the goods and services we procure.

Business Travel and Expenses

Our policy overview

When we plan to travel, we balance the business need, environmental impact, financial cost and the health and wellbeing of our employees.

Our conduct

- Follow your local policy. Ensure you have the necessary approvals from your line manager.
- Have a cost-conscious approach and only claim expenses which are reasonable and necessary and in line with your applicable expenses policy.
- Think about your impact on the environment – do you need to travel, or could you use technology to connect and collaborate?
- Think about your wellbeing and that of anyone reporting to you – do you or they need to travel, or could you use technology to connect and collaborate?



Further information

Policy Zone	<u>Link to Policy Zone</u>
Contacts	Group Procurement Director Your divisional finance director

Anti-Bribery and Anti-Corruption

Our policy overview

We are committed to avoiding all forms of bribery and corruption and complying with associated laws, supporting efforts to eliminate bribery and corruption worldwide and we encourage our suppliers, customers and partners to do the same. The UK Bribery Act applies throughout our global operations (as well as any local legislation).

We do not accept bribes or facilitation payments in any form, or gifts or hospitality in cash. Local practices and customs do not create an exception to our approach.

If you want to engage with third parties, to act on Capita's behalf, our anti- bribery rules apply equally to any supplier, third party agent or introducer, and appropriate due diligence must be carried out before you engage with them. Ensure any contractual agreements contain appropriate anti-corruption and anti-bribery clauses, and any required training is provided.

Our conduct

- Always know who you are doing business with and perform and update relevant due diligence on business partners, agents and suppliers.
- Comply with Capita's Anti-Bribery and Corruption Standard and any applicable local policy and/or legislation.
- Document any engagement with an agent, third party provider or introducer and include appropriate anti-bribery and anti-corruption commitments.
- Never offer, or accept, any improper payments or other advantage to or from third parties, including facilitation payments.

Further information

Policy Zone	Link to Policy Zone
Contacts	Head of Financial Crime Prevention groupfinancialcrime@capita.com

Gifts and Entertainment

Our policy overview

Reasonable hospitality and gifts help us to establish and develop business relationships, but anything inappropriate or excessive can be viewed as an unfair business advantage or bribery.

We are committed to following high legal and ethical standards.

We declare gifts and hospitality and are open and honest about our activities.

Our conduct

- Ensure you have read and follow Capita's Gifts & Hospitality Standard.
- Take care when offering, promising, giving or accepting gifts and never offer or accept cash gifts.
- Ensure any gifts or hospitality do not influence the recipient to act improperly or award us any business – financial or otherwise.
- Make it clear that accepting any hospitality will not influence your decision-making or business judgment.
- If a public official is involved, check for any applicable rules and guidance as there is a heightened risk of perceived bribery.
- Get prior approval for and record gifts, entertainment and hospitality (given or received) where the value meets the defined threshold.
- Discuss any concerns with your line manager or the Group Financial Crime Team.



Further information

Policy Zone	<u>Link to Policy Zone</u>
Contacts	Group Financial Crime Team <u>groupfinancialcrime@capita.com</u>

Political Donations

Our policy overview

Capita is a politically neutral organisation and does not:

- Campaign for or support any political party, group or individual.
- Make political donations.

Capita engages with government only on business-relevant issues, ensuring communication is honest, unbiased and accurate.

Our conduct

- Keep personal political activity separate from your Capita role.
- Do not use Capita funds or resources (e.g. time, meeting space, phones) for political purposes.
- Never pressure colleagues to make political contributions.
- Political speakers (including former politicians and government officials such as elected officials, heads of state, cabinet secretaries) may only be paid with CEO or CFO approval.
- Non-political speakers (e.g. Central bankers, chief economists and academics) can be paid a fee.
- Political speakers who do not receive a fee may have reasonable expenses covered but must not receive preferential treatment.
- You must follow your local standard events procedures for speaker fees for non-political events.

Further information

Policy Zone	Link to Policy Zone
Contacts	Chief General Counsel

Anti-Money Laundering, Terrorist Financing, Sanctions, Fraud and Facilitation of Tax Evasion

Our policy overview

We share a legal, regulatory, ethical and social responsibility to protect our customers and clients and others we do business with. We have a zero tolerance to fraud and other dishonest activities. We will work to ensure our products and systems do not:

- Help criminals to launder or hide the proceeds of crime.
- Finance terrorism.
- Facilitate tax evasion.
- Aid and commit fraud.
- Bypass sanctions laws, including trade embargoes, targeted, sectoral and implicit economic sanctions, and travel bans.

Our conduct

- Adhere to Financial Crime policy and the standards and procedures which support us to prevent, detect, investigate and report financial crime.
- Raise concerns of breaches, or risks of financial crime, and cooperate with any legal enquiries.
- Immediately refer any enquiries from regulators or public authorities on anti-money laundering, terrorist financing, fraud and facilitation of tax evasion to groupfinancialcrime@capita.co.uk.
- Refer any queries on trade sanctions to the Group Legal Team, do not comment unless you are cleared to do so unless relevant regulation prevents you from doing so.

Further information

Policy Zone	Link to Policy Zone
Contacts	Head of Financial Crime Prevention groupfinancialcrime@capita.com

Fair Competition

Our policy overview

Capita is committed to full compliance with UK and international competition (antitrust) laws. These laws are designed to ensure fair competition, protect consumers, and prevent anti-competitive practices.

Examples of anti-competitive practices include:

- Sharing sensitive competitive information with competitors (e.g. prices, costs and sales volumes).
- Agreeing with competitors to fix prices, discounts, or divide up certain regions, markets or customers between them.
- Setting minimum resale prices with resellers or distributors.

Our conduct

- Understand the basics of competition law and if in doubt, speak to the Legal Team.
- Never seek, share or discuss confidential information with competitors.
- Do not encourage others (e.g. customers, suppliers, or ex-employees of competitors) to provide information they should keep confidential.
- Report any contact from competition authorities, legal actions involving alleged competition breaches or unsolicited disclosures from competitors to the Legal Team.
- Never contact competition authorities without approval from the Legal Team.

Further information

Policy Zone	Link to Policy Zone
Contacts	Chief General Counsel

Regulatory Investigation

Our policy overview

Capita operates in regulated environments and is committed to full compliance with all applicable laws and regulations. This includes cooperating transparently with financial, governmental and other regulatory bodies.

Our conduct

- Cooperate with all internal and external investigations or reviews).
- Non-cooperation may be a criminal offence and could lead to disciplinary action, including dismissal.
- Follow all relevant policies, including business specific policies and Capita-wide procedures.
- Notify your line manager immediately if you're involved in any external investigation, unless legally prohibited – and ensure the Legal Team is informed.
- Preserve all relevant information: do not withhold, alter or destroy documents or data.
- Be honest and transparent in how information is recorded and reported.



Further information

Policy Zone	Link to Policy Zone
Contacts	Chief General Counsel

Confidentiality of Information and Insider Dealing

Our policy overview

You should not share or use confidential or financial information of Capita other than as strictly required to perform your duties and responsibilities. In addition, you should not use 'inside' information for personal gain or deal in Capita or third-party securities or shares based on this information. Inside Information is specific information about a company which has not been made public and which a reasonable investor would consider important when deciding whether to buy, sell or hold shares or other securities. For Capita this may include Capita's financial results before they are announced, significant contract wins, changes to directors, business acquisitions and disposal and any dividends before they are announced. This list is not exhaustive, and other matters may also constitute 'inside' information. Capita has a process to oversee appropriate and prompt disclosure of information.

It is against the law and against Company policy to use inside information for your own benefit, or on behalf of others. We take insider dealing extremely seriously and individuals found guilty of insider dealing may be fined and imprisoned. In addition, any individual who has breached the Company's Share Dealing Code may be subject to disciplinary procedures.

Our conduct

- You have a duty of confidentiality, are responsible for ensuring only authorised people have access to confidential information and must not disclose confidential information without authorisation.
- You must use all appropriate measures to ensure information remains confidential.
- You must comply with Capita's Share Dealing Policy.
- If you have any concerns or questions, please raise these with the Legal team or Company Secretariat team without delay.



Further information

Policy Zone	Link to Policy Zone
Contacts	Chief General Counsel

Contracts, Expenditure, and Delegation of Authority

Our policy overview

We expect you to show integrity and careful judgment when spending company funds. The misuse of company resources and assets is strictly forbidden. You must never commit your business to contractual obligations unless you are authorised to do so. We have a formal delegation of authority approach. This sets out who can authorise expenditure, up to specific limits and separately, who can sign contracts.

Our conduct

- If you have not been granted formal authority to sign contracts on behalf of your company, or business area you cannot sign the contract. Explain to the customer, supplier or other third party that we have a process which must be followed and wait until an approved person can sign.
- You may have authority to approve expenditure, in line with our delegation of authority matrix. You may only approve up to the specific limit granted. This authority may be separate from your authority to sign a contract.
- If you are not sure if you have approval authority, contact your line manager or your Divisional Finance Director.



Further information

Policy Zone	Link to Policy Zone
Contacts	Group Commercial Director

Use of Artificial Intelligence

What is Artificial Intelligence

Artificial Intelligence refers to computer systems designed to execute tasks that typically require human intelligence. Generative AI is a subset of AI capable of producing new content, including text, images, audio, and code.

Our policy overview

At Capita, we are committed to leveraging AI to enhance our digital capabilities and improve customer service. When we use AI, it is important that we do so in accordance with applicable laws, and in a manner which is consistent with Capita Values and our AI principles. All development, deployment and use of AI is governed by Capita's AI Governance Council (AICDC) and its subcommittees, which is an ExT led council reporting directly to the Board.

Our conduct

- Use AI responsibility, ethically and legal, and in a manner consistent with our values and objectives.
- Respect the rights of individual data subjects, employees, customers, clients, partners and other stakeholders who may be affected by our use of AI.
- Ensure AI is used to create better outcomes for employees, clients and suppliers.
- Ensure AI does not create or exacerbate bias or discrimination.
- Protect the privacy and security of the data we process.
- Adhere to our legal and regulatory obligations e.g. data protection legislation and the EU AI Act.
- Establish mechanisms to ensure AI outputs are factually correct and in line with Capita Values.
- Ensure we have the appropriate licenses and permissions before using third party data and materials as prompts to create AI outputs.

Further information

Policy Zone	Link to Policy Zone
Contacts	Chief General Counsel

Our Assets and Information

We protect our assets and the information and data we hold

Brand

Our policy overview

As well as the main Capita brand, we own many other brands which are equally valuable. We protect all our brands and use them consistently.

Our conduct

- Comply with our brand policies and guidelines.
- Report any suspected misuse of any of our brands, or our brand policy
- Do not allow any third party to use our name, or any other brand, without permission from Marketing and a licence agreement from Legal.
- Do not use the company brands for something which is not official company business.



Further information

Policy Zone	<u>Link to Policy Zone</u>
Contacts	marketing@capita.co.uk

Intellectual Property and Confidential Information

Our policy overview

The unique and valuable brands and ideas that our businesses create – our Intellectual Property (IP), are protected by copyright, patents, trademarks, confidentiality restrictions and trade secrets or other forms of IP protection, anywhere in the world we do business. We also ensure that we use the IP of other businesses in the way that we are authorised to do so.

Our conduct

- Pass all IP related queries to your Legal Team and let the team know if you think our brand or IP is being misused.
- Do not use the IP, brands or logos of another organisation without its written permission.
- Protect Capita's confidential information and IP. Enter into non-disclosure agreements before sharing confidential information or IP. Ask your Legal team for the appropriate agreement.
- Even where non-disclosure agreements are in place, only share confidential information to the minimum extent necessary to achieve the intended outcome.
- Comply with any agreements with partners, customers and others about contract announcements and the use of the other party's name and IP.
- Do not release information about Capita's finances, new products, services or contracts without approval from your line manager or communications lead.
- Report any unauthorised disclosure of confidential information as soon as possible.



Further information

Policy Zone	<u>Link to Policy Zone</u>
Contacts	Group Legal Director

Communications

Our policy overview

We communicate openly and transparently with all our stakeholders, including our colleagues, clients and customers, investors, politicians and the media – at the right time and in an appropriate way. We provide accurate and clear information, in order to improve understanding of and support for Capita's purpose, strategy and performance. At the same time, we uphold our obligations to keep certain information confidential, with limited access to those who need to know, alongside selective disclosure of financial and/or inside information that could impact our share price and/or reputation.



External Communications: We protect, maintain and aim to improve Capita's reputation by building and maintaining relationships with our key external stakeholders and providing insightful information in a timely and appropriate manner.

Internal communications: We share open, timely information with colleagues about what's happening in our business, while asking for views and feedback. Our communications, both written and verbal, should be clear, accurate, consistent and responsible.

Social media: Sites such as LinkedIn, Facebook and Instagram, provide opportunities for us to promote Capita and its businesses, people and values both internally and externally. We encourage colleagues to take part in the social conversation, share their knowledge and be proud of achievements and experiences, while being conscious of any potential reputational risk. Only the communications teams are permitted to set up social media pages for Capita; you must not set up any Capita social media pages, without approval from your communications team.

Our conduct

- Be professional when you represent us and do not say things that could adversely affect Capita and its reputation.
- Respect your audience and never use insulting, obscene, defamatory, inflammatory or discriminatory language.
- Do not make comments to external stakeholders, such as the media, industry analysts or government figures on behalf of Capita and our businesses unless you have had prior approval to do so.
- If you are contacted by any external stakeholders, as above, please do not comment and pass the enquiry onto the Corporate Communications team (external communications or public affairs).
- Be sensible if you discuss work on personal social media sites. Remember you are a brand ambassador and should always uphold our values and protect our reputation.
- If you write anything for an internal audience – for example, an email to your team or a slide deck to share on a team call, please consider how it could be perceived if it was disclosed externally. It should be carefully and consistently drafted to align with our key external messages and not be potentially reputationally damaging.
- Remember our obligations as a listed company are to ensure that we protect and/or disclose information lawfully and do not provoke any financial or reputational risk.
- Confidential and/or inside information should be respected as such; sit within password-protected documents if necessary; and only be communicated or forwarded on in an authorised way.



Further information

Policy Zone	<u>Link to Policy Zone</u>
Contacts	marketing@capita.co.uk

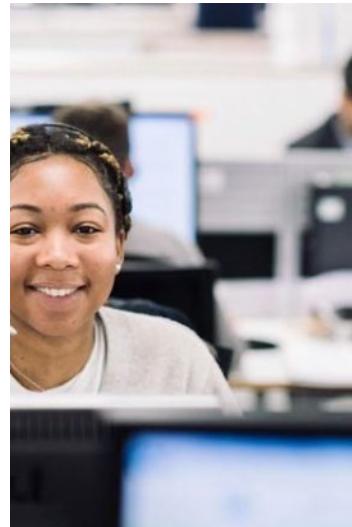
Information Security

Our policy overview

We expect high standards of information security, regardless of whether information is ours, our clients, or people outside of Capita. Every person who works for us has a shared responsibility to keep information safe. We are committed to maintaining the confidentiality, integrity and availability of information, protecting information assets and raising and maintaining security awareness.

Our conduct

- Protecting information assets consistently to a high standard to prevent compromise by external and internal threats, deliberate and accidental.
- Ensure you have read and fully understood Capita's Information & Cyber Security policy and Acceptable Use Standard.
- Work within and follow the requirements of Capita's Security Standards which support and relate to your role and your responsibilities.
- Maintaining security awareness to help avoid the unintentional or malicious disclosure of confidential information.
- To remain vigilant to security threats and always protect all information in your care.
- Report all security incidents and inform your manager if you suspect anything which may compromise security or informational assets.



Further information

Policy Zone	<u>Link to Policy Zone</u>
Contacts	CISO

Privacy

Our policy overview

We are committed to protecting the privacy and personal data of our colleagues, clients, and partners. We handle all personal information in accordance with applicable data protection legislation, including the UK General Data Protection Regulation (UK GDPR), the General Data Protection Regulation, the Data Protection Act 2018, and other relevant privacy laws.

We collect, use, store, retain, transfer, and delete personal data solely for lawful, specified, and legitimate purposes. Personal data is retained only for as long as necessary to fulfil those purposes, and we ensure appropriate safeguards are in place throughout the data lifecycle.

We only share personal data when there is a lawful basis to do so—such as for contractual, legal, or regulatory reasons—and always in compliance with applicable privacy laws. When data is transferred to third parties, we ensure that appropriate data protection measures are in place and that recipients understand their responsibilities to safeguard the data.

We respect individuals' rights in relation to their personal data, including the rights to access, rectify, update, restrict, or erase their information. We encourage everyone to regularly review and manage their personal data, and we provide clear channels for exercising these rights.

We also promote a culture of privacy awareness and accountability across our organisation, ensuring that everyone understands the importance of data protection and their role in upholding it.

Our conduct

- Follow the procedure, guidance and standards produced by the Privacy Team (see the [Privacy Toolkit](#)).
- Collect and use personal data fairly, lawfully and transparently, ensuring there is a valid legal basis for processing.
- Keep personal data secure, accurate and up to date, and take steps to correct inaccuracies promptly.
- Respect individuals' rights -for example, by responding appropriately to subject access requests, honouring requests to opt out of marketing, and rectifying or erasing incorrect information.
- Only disclose personal information to those individuals or organisations who are authorised and have a legitimate need to receive it.

- Avoid collecting or retaining excessive amounts of personal data and ensure it is not kept for longer than necessary.
- Report any actual or suspected personal data breaches as soon as possible and no later than 24 hours via our mandated incident reporting tool and to the Privacy Team.
- Complete the mandatory data privacy training annually.
- Seek guidance from the Privacy Team if you are unsure about any aspect of data protection or privacy compliance.

Further information

Policy Zone	<u>Link to Policy Zone</u>
Contacts	Chief Data Protection Officer

Further information

Our policies and the standards and procedures which support them provide more on what you have read here. They set out the control objectives, principles, and other core requirements for Capita's activities.

Unless there are specific regulatory or statutory requirements in particular jurisdictions, all policies are expected to apply Capita-wide. You can find them in the [Policy Zone](#). If you do not have access your line manager can help ensure you get copies. Publicly available policies can also be found at www.capita.com.

A list of policies, standards and procedures referenced in the Code is shown below:

- Intellectual Property Standard
- Business Travel and Expense Policy
- Disclosure and Control of Inside Information Standard
- Share Dealing Procedure
- Dawn Raid Standard and Procedure
- Diversity and Inclusion Policy
- Anti-Racism, Discrimination, Harassment and Bullying Policy and Procedure
- Financial Crime Policy and Standards
- Health, Safety and Environmental Policy and Standard
- Wellbeing Policy and Standard
- Safeguarding Policy and Standard
- Human Rights Policy
- Information and Cyber Security Policy and Standards
- Privacy Policy and Standards/Procedures
- Procurement Policy Standard and Supplier Charter
- Social Media Policy and Standard
- Speak Up Policy and Standard