



Responsible Business Data Book

Supplement to the Responsible Business section
of the Annual Report and Accounts 2025

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About this Data Book

This Responsible Business Data Book is published to supplement the Responsible Business section of Capita plc's **Annual Report and Accounts 2025**. It provides additional information, performance data and supporting evidence relating to Capita's material topics, helping stakeholders better understand the company's approach to managing its most significant impacts, risks and opportunities.

Reporting scope and boundaries

The Data Book should be read alongside Capita's Annual Report and Accounts 2025, which sets out the Group's Responsible Business strategy, governance arrangements, material topics, commitments and performance. This document focuses primarily on social and governance-related Responsible Business topics. Detailed environmental performance data, methodologies and metrics are reported separately in Capita's **Environmental Data Book**, which complements the disclosures contained within this document and the Annual Report and Accounts 2025.

Unless otherwise stated, information in this document relates to Capita plc and its consolidated operations and has been prepared using internal management information, policies, reporting systems and publicly available disclosures current at the time of publication. Information may be updated in future editions to reflect improvements in methodology, data quality, reporting processes or organisational changes, with comparative information restated where appropriate to support consistency and transparency.

Governance and responsibility

Responsible Business information included in this Data Book has been compiled by Capita's Responsible Business team, with input and review from relevant subject matter experts across the organisation.

Our People

Labour Practices – Employee Support Programmes

Material topic: Human and labour rights.

Policies: Human Rights and Modern Slavery Policy, People Policy.

Policy Coverage: Capita Group, employees, temporary workers, suppliers and partners.

Performance Monitoring: Capita monitors the accessibility and effectiveness of employee support programmes through established HR processes and people metrics, including colleague engagement, wellbeing, workplace adjustments, flexible working arrangements and participation in employee support initiatives. The organisation seeks to provide an inclusive and supportive working environment that enables colleagues to balance work and personal responsibilities, access appropriate support when needed and maintain positive wellbeing and employee experience outcomes.

Key Programmes and Controls: We want all colleagues to have the support and flexibility to help balance work, family commitments, wellbeing and the ups and downs of life. We offer a range of leave provisions and support through different life events, whether colleagues need emergency time off, are becoming a parent, have caring responsibilities, are going through fertility treatment, have lost a loved one or want a career break. As a virtual first organisation we enable colleagues to work as flexibly as their role allows, supported by family friendly policies and additional benefits. Employee support programmes include:

- **Adjustments Passport:** We encourage the use of an Adjustments Passport for colleagues to discuss and record adjustments between them and their manager that will support them in relation to any disability, health condition, neurodivergence, caring responsibilities, menopause or other life events that may impact them at work. The nature of the adjustments will depend on each individual situation but often relate to changes to the job or workspace, working arrangements or the provision of additional support.
- **Employee Network Groups:** Capita's Employee Network Groups (ENGs) are colleague-led communities designed to raise awareness, educate, and foster collaboration across the organisation. The networks are open to everyone and play a key role in making Capita an inclusive and supportive workplace. The main ENGs are Ability, Rainbow Alliance, Multi-Faith, Gender, Wellbeing, Family, Embrace, Cancer Support and Armed Forces. Each network is run by colleagues with senior leader sponsorship and provides a robust community for support, learning, and advocacy with activities such as Lunch & Learns, listening sessions, and open forums to hear from colleagues and share experiences.
- **Parental Partners Scheme:** The Parental Partners scheme is part of Capita's Family Network Group and is designed to support colleagues who are taking family leave such as maternity, paternity, adoption, or shared parental leave and those returning to work afterwards. The scheme can buddy up colleagues who will listen and share their own lived experience of taking family leave and returning to work. It provides a peer support network, helping colleagues navigate the challenges and opportunities of balancing work and family commitments.
- **Employee Assistance Programme (EAP):** The EAP is available to all colleagues, providing resources to help manage stress and anxiety, offering direct access to counselling and practical advice on personal or work matters for example stress, debt, becoming a parent, nutrition or resolving disputes with landlords or neighbours. It is a confidential service and independent of Capita.
- **Voluntary Benefits:** There are a range of additional benefits and savings available to suit colleagues and their personal circumstances, including annual leave purchase scheme; cycle to work scheme; healthcare cash plan; dental insurance; gym membership; family activity pass; life assurance and

critical illness insurance; salary advances and affordable loans; will writing; many more employee discounts and vouchers via Perks at Work.

- **Family-Friendly Programmes:** The below summarises our UK provisions, other countries vary according to local legislation.
 - Enhanced maternity, paternity, adoption and shared parental leave.
 - Enhanced neonatal leave for new parents.
 - Enhanced pregnancy loss leave at any stage of pregnancy loss, which also extends to miscarriage.
 - Paid time off to support colleagues through periods of fertility treatment.
 - Breastfeeding facilities for colleagues who are office based, access provided as required to a private room to express and store milk during the working day.
 - Enhanced parental bereavement leave and compassionate leave.
 - Day one access to flexible working, parental leave, carers leave and emergency time off for dependants.
 - Career breaks providing extended periods of unpaid leave.

Labour Practices – Redundancy Support

Material topic: Human and labour rights.

Policies: Human Rights and Modern Slavery Policy, People Policy.

Policy Coverage: Capita Group, employees and temporary workers.

Key Programmes and Controls: Capita has robust, thorough and supportive provisions in place where entrenchment/redundancy becomes necessary.

We will always consider any measures which might avoid or minimise the need for redundancy, but sometimes organisational changes mean that redundancies are unavoidable. Our redundancy procedure sets out the requirements and guidance for each stage of a redundancy process to support managers and HR in ensuring fairness and consistency for employees. This includes:

- **Planning:** Before considering a redundancy process the business will seek to avoid or minimise any potential compulsory redundancies by considering actions such as reviewing the use of third-party workers, reducing external recruitment, not backfilling leavers, redeployment and other suitable alternatives.

All redundancy programmes should have a clear business rationale, options explored to mitigate impact, proposed timelines, full considered costs, impacted roles, organisational structures and consultation plans completed as part of the planning phase.

- **Consultation:** Any affected employees will be consulted in good time; individually and where appropriate, collectively. The purpose of consultation is to discuss the business rationale for the proposed change; explore ways to avoid or minimise the number of redundancies; seek to agree selection criteria to be used, where appropriate; provide the employees with support and a forum to ask questions; give feedback on the proposals.

Through any consultation period we commit to keeping employees informed, support their mental wellbeing and help them to understand the business proposal and long-term impact.

Where the business recognises a trade union, we also consult with the representatives in respect of any employees who are affected by the proposals.

Consultation is undertaken in compliance with local legislation i.e. in the UK where it is proposed that 19 or less employees are to be made redundant at the same time or in a period of 90 days or less within an establishment, the business will consult with the employees individually within a reasonable timeframe. Where it is proposed that 20 or more employees are to be made redundant, the business will consult collectively with the appropriate representatives in line with minimum consultation periods.

- **Selection Criteria:** Where there is a need to reduce the headcount in a pool of employees we are committed to using a fair, consistent, objective and non-discriminatory selection procedure. Selection is based upon the skills required for the role, which could be the current role, or a new role in the proposed structure. The proposed selection criteria are shared for feedback during the consultation process with the at-risk employees and representatives, where collective consultation is being utilised.

Methods of selection include a skills matrix, competency-based interview and/or presentation. The selection criteria are fundamental to ensuring a fair selection and are reviewed to ensure they are objective, without bias or discrimination (direct or indirect).

All selection assessments are calibrated to ensure they have been scored fairly and consistently no matter who has conducted the selection assessment. Wherever possible this is via an independent manager plus a HR Representative.

- **Redeployment:** At risk employees may secure a redeployment opportunity with Capita and therefore avoid redundancy. We support all employees in their redeployment activities in line with our internal mobility procedure. Current vacancies are advertised internally and the HR Representative will engage with the Talent Acquisition team to identify potential redeployment opportunities. An at-risk employee that meets the requirements for the role or have a skills match, will be offered an interview.

Employees redeployed into an alternative position are entitled to a 4-week trial period in order to determine the suitability of the role by both parties.

- **Severance:** Eligible employees receive a redundancy payment, notice, accrued annual leave and benefits in accordance with their terms and conditions of employment and in compliance with the relevant statutory requirements.
- **Support:** Any employee issued with notice of redundancy can take reasonable time off with full pay to seek alternative employment, which will include activities such as a job search, preparation for and attending interviews or job training opportunities.

We are very aware that redundancy is an uncertain and unsettling time and are committed to providing employees with outplacement support and resources. This includes reviewing CVs, providing interview skills guidance, guidance on how to use recruitment agencies, guidance on how to use social media to find job opportunities, providing information about pension and benefits, providing useful contacts.

There is also support available for at risk employees via the Employee Assistance Programme (EAP), providing resources to help manage stress and anxiety, offering direct access to counselling and practical advice on personal or work matters. It is a confidential service and independent of Capita.

Where an employee is known to have a disability, reasonable adjustments are considered so that any additional support can be provided during the redundancy process. In the selection process as an example, we suggest actions such as: providing the employee with the selection interview questions in advance of the interview; giving the employee more time to answer the interview questions; rephrasing interview questions; submitting written responses to interview questions; allowing someone to attend the interview with the employee for wellbeing support.

Labour Practices – Working Conditions

Material topic: Human and labour rights.

Policies: Human Rights and Modern Slavery Policy, People Policy.

Policy Coverage: Capita Group, employees, temporary workers, suppliers and partners.

Performance Monitoring: Capita monitors working conditions through established HR processes, including oversight of working hours, overtime, remuneration and employee wellbeing. For example:

- Pay equity / remuneration-related metrics (see Capita 2025 Gender, Ethnicity and Disability Pay Gap Report).
- % of employees taking annual leave (2025: 97.7%).
- Number of employees receiving recognition through Celebrate! (24,650 since September 2025).
- ENPS score (2025:+11% since 2024).
- Inclusion score (2025: +1% since 2024).
- Wellbeing score (2025: +13% since 2024).
- % of employees completing their performance reviews (Q1 2026: 85.5%).

Key Programmes and Controls: Working hours, including overtime, are managed in line with applicable laws and internal policies, with controls in place to monitor working time and prevent excessive working hours.

Capita is committed to providing fair and competitive remuneration aligned with market benchmarks and applicable legal requirements, supported by structured pay frameworks and governance processes. Employees are compensated for overtime or atypical working hours in accordance with contractual terms and applicable legal requirements.

Processes are in place to ensure employees take their paid annual leave entitlements, supporting wellbeing and compliance with legal requirements. Employees are asked to book at least 8 days of annual leave in advance of the first half of the year to encourage regular breaks and reduce the risk of burnout.

Capita engages with employee representatives and consultative forums, where applicable, to discuss working conditions and related matters. We conduct an annual employee survey designed to capture colleague sentiment across key areas including inclusion, wellbeing, engagement, and pay and reward, with employees also able to provide written comments to give additional context to their responses.

From 2026, the performance management process has shifted towards a more continuous and transparent approach, replacing infrequent formal reviews with regular quarterly check-ins. These structured conversations provide more timely feedback, greater transparency, and more consistent assessment of performance, supporting a fairer and more equitable employee experience.

Remuneration frameworks, including pay ranges and progression processes, are communicated to employees through established HR systems and policies, supporting transparency and consistency in pay decisions.

We introduced a new recognition platform Celebrate! last year, enabling more consistent and visible acknowledgement of employee contributions, helping to improve engagement and morale.

Topic covered in the Annual Report and Accounts 2025: p. 48,54,55.

Occupational Health and Safety

Material topic: Employee health, safety and wellbeing.

Policies: Health, Safety and Environmental Policy, Code of Conduct, Supplier Charter.

Policy Coverage: Capita Group, employees, temporary workers, suppliers and partners.

Performance Monitoring: Capita monitors occupational health and safety performance through defined KPIs, including incident rates and employee health-related metrics. Where applicable, operational sites are aligned to recognised standards (e.g. ISO 45001). Targets are set to continuously reduce workplace incidents and improve employee wellbeing outcomes. The following metrics are used:

- Total number and severity of health and safety incidents, including near misses, lost time incidents, reportable incidents (e.g. RIDDORs) and associated working days lost.
- Completion rates for risk assessments, Display Screen Equipment (DSE) assessments and other key health and safety compliance activities.
- Number of health and safety audits, inspections, assurance reviews and resulting corrective actions.
- Number of health and safety concerns reported and addressed through management, incident reporting or Speak Up channels.
- Extent of certification and alignment to recognised occupational health and safety standards, including ISO 45001 where applicable (as of June 2026, at least six accounts have ISO 45001 certification covering at least eight of our sites and all associated activities managed by those accounts).

How we manage this topic:

Capita maintains a robust health, safety and environment (HSE) management system aligned with ISO 45001, with over 95% of operations complying with internal procedures and regulatory requirements.

OHS risks are managed through site-level, account and sector related risks and by monthly location inspections, completed for all operational locations and reviewed annually, supported by regular inspections and audits. Identified risks are prioritised and addressed through structured action plans integrated into operational processes.

Accident reporting is managed through CASPER (Capita's system for recording and managing HSE incidents, inspections, and compliance), with all incidents investigated according to tiered risk levels to prevent recurrence and any RIDDORs reported to the HSE within the required timescales.

Procedures are in place to prepare for and respond to emergency situations, supported by incident response protocols and broader business continuity arrangements.

OHS awareness is supported through mandatory training, with 97% completion across the organisation. Health and safety requirements are also embedded within supplier expectations through contractual obligations and the Supplier Charter.

Topic covered in the Annual Report and Accounts 2025: p. 53.

Our Business

Anti-Bribery and Corruption

Material topic: Business conduct and Ethical AI.

Policies: Financial Crime Policy, ABC Standards, Code of Conduct, Supplier Charter.

Policy Coverage: Capita Group, employees, temporary workers, suppliers and partners.

Performance Monitoring: Capita monitors the effectiveness of its anti-bribery and corruption programme through governance, compliance, training, risk management and assurance measures. The following metrics/criteria are used to assess the prevention, detection and management of bribery and corruption risks across the organisation:

- Number of bribery, corruption or financial crime concerns reported through Speak Up or other reporting channels.
- Third parties are subject to risk-based due diligence and screening processes.
- Number of gifts, hospitality and other sensitive transactions reviewed or approved through defined governance procedures.
- Internal audit, compliance monitoring and assurance findings relating to anti-bribery and corruption controls, including the status of corrective actions.
- Number of significant regulatory breaches, enforcement actions or compliance incidents related to bribery and corruption.
- Completion rates for mandatory financial crime training, that include Anti-Bribery and Corruption section.

Key Programmes and Controls: Capita maintains a group-wide Anti-bribery and Corruption Standard which augments, the Financial Crime Policy and Code of Conduct. The standard covers prevention of bribery and corruption, guidance on gifts and hospitality, and requirements relating to charitable contributions, sponsorships and political engagement.

Capita implements a range of controls to prevent bribery and corruption, including mandatory annual financial crime training for all employees, covering ABC principles, identification and reporting of risks, and handling of gifts and hospitality.

Reasonable procedures include group wide risk assessments and risk-based due diligence on third parties. Financial and operational controls, including audits of accounting and procurement processes, and specific approval procedures govern sensitive transactions, such as gifts, hospitality and travel.

A confidential Speak Up mechanism is available to employees and external stakeholders to report concerns, with all allegations subject to formal investigation and appropriate disciplinary action.

Topic covered in the Annual Report and Accounts 2025: p. 57.

Data Privacy

Material topic: Cyber security and data protection.

Policies: Privacy Policy, Code of Conduct, Data Privacy Control Framework.

Policy Coverage: Policies apply across Capita Group, including employees, temporary workers, suppliers and partners, and set out requirements for the collection, processing, sharing and retention of personal data and confidential information.

Performance Monitoring: Capita monitors data privacy and protection through governance, risk and compliance processes, including through tracking completion rates for data protection training (2025: 97% (target -95%)).

Key Programmes and Controls: Capita implements a range of controls to protect personal and confidential data, including defined processes governing the collection, use, sharing and retention of information. The cornerstone of Capita's key privacy controls includes the Data Privacy Control Framework (DPCF) implemented in 2025 and aligned to the ICO Accountability Framework. It establishes twelve key privacy controls covering governance, transparency, risk assessment, incident management, individual rights, contracts and data sharing, monitoring and assurance, marketing, training and artificial intelligence.

Controls include key regulatory risk assessments such as Data Privacy Impact Assessments (DPIAs) for high-risk processing together with Privacy by Design and Default principles that are embedded in business processes from the very start of the development cycle.

In addition, Records of Processing Activities (RoPA) are maintained through a centralised governance platform to ensure accountability for personal data processing and formal processes exist for handling data subject rights requests, including access, rectification, erasure, restriction, portability, objection and withdrawal of consent.

Capita delivers mandatory privacy awareness training to support employees in understanding their responsibilities for data protection and to also understand key regulatory requirements consistent with ICO requirements. The Capita Data Privacy Team also delivers a range of training workshops tailored to specific needs of the business. During 2026 updated and improved mandatory privacy awareness training will be rolled out together with a programme of short training videos for Data Stewards.

Regular monitoring, assurance reviews and internal audit activities assess compliance and drive continuous improvement. Personal data incidents are subject to defined reporting, investigation and escalation procedures, with corrective and disciplinary actions applied where appropriate. The Data Privacy Team undertakes regular reviews of reported Personal Data Incidents to identify and provide feedback to teams in a cycle of continuous improvement.

Third-party suppliers and sub-processors are subject to due diligence, contractual controls and ongoing oversight.

The framework operates through a three-lines-of-defence governance model and is subject to ongoing monitoring and independent assurance. Within this three-lines-of-defence model, Capita's DPCF has resulted in the appointment of Data Stewards and Data Owners at the first line who are responsible for oversight and implementation of the privacy controls. This model is then supported by Privacy and Internal Audit teams that provide a range of governance and assurance programmes that provide feedback to help continuous improvement and improved compliance.

Capita ensures that personal data is only processed where an appropriate lawful basis has been identified and documented. Where consent is the relevant lawful basis, processes are in place to obtain, record, manage and withdraw consent. Individuals are provided with clear privacy information explaining how their data is collected, used, shared and retained, and mechanisms exist to exercise privacy rights including withdrawal of consent.

Topic covered in the Annual Report and Accounts 2025: p. 58.

Responsible AI

Material topic: Business conduct and Ethical AI.

Policies: AI Charter, Artificial Intelligence Security Policy, Code of Conduct.

Policy Coverage: Capita Group, employees, temporary workers, suppliers and partners.

Performance Monitoring: Capita monitors the effectiveness of its Responsible AI programme through governance, risk, compliance, training and assurance metrics. The following metrics and criteria are used to assess the responsible, secure and ethical development, deployment and use of AI across the organisation:

- Number of AI use cases reviewed, assessed and approved through AI governance processes.
- Number of AI use cases classified as higher-risk and subject to enhanced governance requirements.
- Number of AI agents under governance using Capita approved platform.
- Completion rates for mandatory AI, data and security training programmes.
- Number and severity of AI-related policy, security, privacy or compliance incidents.
- Percentage of AI use cases subject to ongoing monitoring and governance review.
- Adoption of approved AI platforms and tools in accordance with Capita's AI Use Guardrails.
- Internal audit, assurance and compliance findings relating to AI governance controls.
- Progress against AI governance maturity objectives, including alignment to recognised standards such as ISO/IEC 42001.

Key Programmes and Controls:

Capita has established a Responsible AI framework, embedded within broader data ethics, security and governance standards, which applies across the Group, including employees, temporary workers, suppliers and partners.

Capita's AI Charter is underpinned by a set of core Responsible AI principles. These principles support the ethical development and use of AI, including fairness and avoidance of bias, protection of data and systems, transparency and explainability, human oversight and responsibility, and appropriate governance and control of AI use.

Capita implements programmes to operationalise its AI Charter, embedding responsible AI principles into the design, deployment and use of AI through governance, controls, training and ongoing monitoring. Such programmes include:

- **AI Governance Framework:** Transparency, accountability and governance are core principles. Capita operates formal AI governance processes through which new AI use cases are assessed for business value, legal, regulatory, privacy, security and ethical risks prior to deployment. Higher-risk use cases are subject to enhanced scrutiny and governance approval. These processes are supported by governance standards, auditability requirements and human oversight of AI-enabled activities, promoting clear accountability and responsible decision-making throughout the AI lifecycle. Capita also promotes transparency in the use of AI through appropriate guidance on communicating and, where relevant, labelling the use of AI-generated content and AI-enabled outcomes.
- **Responsible AI Principles:** Capita's Responsible AI principles include fairness and avoidance of bias, with Responsible AI requirements embedded throughout the AI lifecycle, including design, development, testing, deployment, monitoring, change management and retirement activities. Governance processes support the identification and management of fairness risks at each stage, including the regular assessment of deployed AI solutions, while governance reviews are conducted

at key lifecycle milestones to ensure continued compliance with Capita's Responsible AI principles and broader risk, security and regulatory requirements.

- **Approved AI Platforms:** Access to sensitive AI capabilities is managed through approved platforms, AI Use Guardrails and defined governance processes. New AI use cases, including any use of higher-risk or sensitive AI capabilities, are subject to risk categorisation, approval requirements and oversight through Capita's AI governance framework.
- **Data Protection and Security Controls:** AI solutions are assessed against Capita's information security, privacy and data protection requirements. The use of sensitive, confidential or personal data within AI solutions is subject to defined governance, approval and control processes.
- **AI Systems Monitoring:** AI systems and use cases are subject to ongoing monitoring and review processes to identify and address risks, including potential drift, degradation, performance issues and unintended outcomes over time. Monitoring activities are supported by implementation monitoring, compliance activities and governance oversight to support the timely identification and correction of issues where required.
- **Assurance and Auditability:** Capita maintains governance records, risk assessments, approval decisions and supporting documentation for AI use cases to support transparency, accountability and auditability.
- **Human in the Loop Assurance:** Human oversight, accountability and governance are embedded throughout Capita's AI lifecycle. Capita requires clear business ownership and accountable decision-makers for AI-enabled services, with human oversight maintained for material decisions and risk-based controls applied to support appropriate review, intervention and escalation. Users and affected third parties are able to raise concerns, challenge AI-supported decisions or outcomes, and seek review through established governance, risk and compliance processes, reinforcing transparency, accountability and responsible AI use.
- **Alignment to Industry Standards:** Capita is aligning its AI governance approach to recognised standards, including ISO/IEC 42001, to strengthen its AI management system and support consistent, auditable application of Responsible AI principles.
- **AI Literacy:** Capita has invested significantly in AI capability-building through initiatives including the AI & Data Academy, AI learning journeys, Copilot adoption programmes and AI-focused awareness campaigns. Capita has also reported upskilling more than 18,000 colleagues in AI literacy.

Sustainable Procurement

Material topic: Sustainable, transparent and resilient supply chains.

Policies: Procurement Policy, Supplier Charter, Procurement Standard, Human Rights and Modern Slavery Policy, Code of Conduct, Speak Up Policy.

Policy Coverage: Capita Group, employees, contractors, suppliers and supply chain partners. The Supply Charter, Procurement Policy and Standard apply to all third-party and internal purchasing activity, regardless of value, across every entity that forms part of Capita Group where goods and services are procured from suppliers. The Supplier Charter sets out expectations for suppliers and supply chain partners across environmental responsibility, health, safety and wellbeing, business ethics, human and labour rights, responsible business, diversity and inclusion, information and cyber security, privacy, intellectual property and confidential information, and business and technology resilience.

Performance Monitoring: Capita monitors sustainable procurement and supplier management through governance, due diligence, supplier assessment, performance management and risk management processes. The following metrics and criteria are used to assess procurement and supply chain performance, subject to availability and approval for public disclosure:

- Percentage of new and renewing suppliers adhering to the Supplier Charter (2025: 100%).
- Percentage of strategic spend covered by annual due diligence risk assessment process that includes information security, privacy, bribery and corruption, and modern slavery checks (2025: 70%).
- Number of suppliers monitored through EcoVadis scorecards, and proportion of spend with suppliers that have scorecards (2025: 400 EcoVadis supplier scorecards were monitored and 54% of spend was with suppliers that have scorecards).
- Proportion of spend with suppliers that have science-based targets (2025: 71%).
- Supplier diversity and SME-related indicators, including SME representation in the supply chain (2025: SMEs including sole traders and micro-businesses, made up approximately 91% of our supply chain and represent 34% of our total spend).
- Supplier payment performance (2025: 97% of our suppliers were paid within 60 days or less and 86% of SMEs were paid within 30 days or less).
- As part of Supplier Onboarding all suppliers complete a sustainability assessment covering their commitments to achieving Net Zero (2025: 100% of all new onboarded suppliers, count: 315).
- All Strategic suppliers are engaged in performance reviews and capacity building initiatives including corrective actions (2025: 100% of Strategic suppliers).

Key Programmes and Controls: Capita embeds responsible business requirements into supplier selection, contracting, onboarding and ongoing supplier management activities through its Procurement Policy and Standard, Supplier Charter and Supplier Management Framework.

- **Integration of social and environmental clauses into supplier contracts:** Capita incorporates social, environmental and governance requirements into supplier contracts and procurement documentation. These clauses cover areas such as environmental management and carbon reduction, human and labour rights, health and safety, business ethics, diversity and inclusion, information security, data privacy and business resilience. Suppliers are required to comply with these requirements, cooperate with audits and due diligence activities, report relevant breaches,

implement corrective actions where necessary and may be subject to contractual remedies, including termination, in cases of material non-compliance.

- **Risk assessment of adverse sustainability impacts in the supply chain:** Capita assesses potential adverse impacts within its supply chain, including risks relating to human rights, modern slavery, labour practices, environmental performance, business ethics and other responsible business issues.
- **Training of buyers on social and environmental issues within the supply chain:** In 2025, 100% of all strategic procurement buyers completed CIPS Ethical Procurement Training, supporting the consistent application of responsible procurement principles across procurement activities. The CIPS Ethical Procurement and Supply Training covered social and environmental issues within supply chains and the risks of adverse impacts arising from supplier activities. The training includes ethical sourcing, human rights, labour practices, modern slavery, anti-bribery and corruption, environmental considerations and supplier due diligence, enabling procurement professionals to identify and manage supply chain sustainability risks.
- **Actions to prevent discrimination and harassment in the workforce of suppliers and ensure inclusive sourcing in the supply chain:** During 2025, Capita engaged suppliers through supplier assessments, due diligence activities and periodic review processes, which included consideration of relevant workforce policies and practices. Where appropriate, suppliers were asked to provide information on measures such as employee training, grievance and reporting mechanisms, and processes intended to support fair and respectful treatment of workers. Where potential gaps were identified, these were discussed with suppliers and, where necessary, follow-up actions were requested. In addition, Capita's procurement processes are designed to support fair and transparent sourcing by applying consistent evaluation criteria and providing suppliers with equitable opportunities to participate in sourcing and tender activities, in line with applicable procurement requirements and business needs.
- **Qualitative and quantitative objectives:** As part of the Procurement Policy, Capita promotes responsible, ethical and sustainable supply chain practices through objectives focused on responsible sourcing, fair and transparent procurement processes, supplier due diligence and ongoing supplier oversight. Progress is monitored through procurement and supplier management activities, including supplier assessment and risk review completion rates, coverage of supplier assurance activities, remediation action tracking, and broader compliance, sustainability and governance measures designed to support effective supply chain management.
- **Sustainable procurement objectives integrated into buyer performance reviews:** Responsible procurement objectives are embedded within Procurement's governance and performance framework. Progress is monitored through the Group Procurement scorecard, including measures relating to SME spend, support for Capita's Science Based Targets and the development of SRM maturity, alongside supplier due diligence, supplier engagement and risk management activities. Relevant objectives may be reflected in team and individual performance goals where appropriate to the role.
- **Capacity building of suppliers on the risks of adverse sustainability impacts:** During 2025, Capita worked with suppliers to strengthen their management of environmental and social risks and to support the prevention and mitigation of adverse sustainability impacts within the supply chain. This included communicating Capita's expectations relating to responsible business conduct through supplier onboarding, due diligence, assessment and review processes, and engaging suppliers on areas such as ethics, modern slavery, workforce practices, environmental management and governance. As part of sourcing and tender activities, sustainability-related criteria formed a component of supplier evaluations, with approximately 20% of the adjudication score allocated to sustainability and responsible business measures where applicable. Where appropriate, suppliers were asked to provide additional information, evidence of controls or improvement plans to address

identified gaps or elevated risks. Procurement and supplier management teams also engaged with suppliers to encourage the sharing of good practice, support continuous improvement and monitor progress against agreed corrective actions as part of ongoing supplier management activities.

- **Incentive programmes for suppliers based on their environmental and social performance:** Capita uses supplier performance information, including sustainability-related assessments and responsible business criteria, to inform supplier relationship management and future sourcing decisions. Suppliers demonstrating strong performance in areas such as environmental management, human rights, labour standards, business ethics and responsible business practices may benefit from increased engagement opportunities, participation in future sourcing activities, preferred supplier status or consideration for contract expansion opportunities. Sustainability performance is also considered during supplier reviews and ongoing supplier management activities, helping to encourage continuous improvement and the prevention of adverse environmental and social impacts across the supply chain.

Topic covered in the Annual Report and Accounts 2025: p. 57-58.

Whistleblowing

Material topic: Business conduct and Ethical AI.

Policies: Speak Up Policy, Code of Conduct, Supplier Charter.

Policy Coverage: Capita Group, employees, temporary workers, suppliers, partners, clients and their customers, as well as other third parties linked to Capita.

The Speak Up policy provides a confidential channel for reporting concerns. Matters that can be reported include:

- Criminal offences, failure to comply with a legal obligation or miscarriage of justice.
- Breaches of our Code of Conduct, their related policies, standards, procedures and guidance, including any applicable industry or professional code.
- Improper conduct or unethical behaviour or behaviours.
- Dangers to health and safety or the environment.
- Sexual harassment.

Performance Monitoring: Capita monitors the effectiveness of its Speak Up programme through governance and case management metrics. The following metrics/criteria are used to assess the accessibility, effectiveness and timely resolution of concerns raised through Speak Up channels:

- Total number of Speak Up / whistleblowing reports received annually, broken down through various categorisations.
- Percentage of Speak Up cases substantiated including the timely resolution and escalation of matters where required.
- Completion rates for mandatory Code of Conduct training, that includes SpeakUp.

Key Programmes and Controls: Capita operates a confidential Speak Up (whistleblowing) programme, enabling employees and third parties to raise concerns about potential misconduct. The programme is supported by defined procedures for reporting, investigation and resolution of concerns.

Speak Up is supported by training and engagement initiatives, including mandatory training aligned to the Code of Conduct, which outlines how to raise concerns and reinforces a culture of openness and non-retaliation.

All reported Speak Up concerns are formally investigated, conducted in line with defined governance and escalation protocols. Investigations are handled confidentially, with outcomes informing appropriate corrective actions, including disciplinary measures where required.

Topic covered in the Annual Report and Accounts 2025: p. 118.