

CAPITA

CAPITA PLC HUMAN RIGHTS POLICY

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1 POLICY**1.1 AUDIENCE**

1.1.1.1 THIS DOCUMENT IS TO BE READ BY ALL EMPLOYEES, INCLUDING PERMANENT, CONTRACT, TEMPORARY PERSONNEL AND SUBCONTRACTORS.

1.1.1.2 THIS DOCUMENT MAY BE PROVIDED TO THIRD PARTIES WITHOUT APPROVAL FROM GROUP HR.

1.2 REQUIREMENT**Introduction**

Capita is committed to respecting the human rights of individuals in all aspects of its operations in the UK and internationally. We also recognise that we have an opportunity to ensure that human rights are understood and observed in the areas that we work.

We are dedicated to providing a safe working environment in which we meet our obligations regarding health and safety, security, equality & diversity and to ensuring that the respect and dignity of all our employees is adhered to at all times.

This policy applies to all the Group's businesses, employees, contractors and sub-contractors.

Our commitment

We support the principles set out in the following international standards:

- UN Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- Core Conventions of the International Labour Organisation

Within our remit, we encourage others to support these standards and ask our suppliers to confirm compliance in their operations.

Policy

We understand our responsibility to respect the human rights of our employees and those of the communities in which we operate. As a services business, we have identified three main areas of responsibility:

- Labour and workplace rights including fair working conditions
 - Freedom of association
 - Development of local communities where we work through our community programmes
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Labour and workplace rights

We provide fair working conditions for our employees including terms and conditions of employment, remuneration, working hours, health & safety, resting time, holiday entitlements and benefits. These are applied according to territory specific statutory requirements. In addition, our Responsible Sourcing Policy outlines the standards that we expect from our suppliers.

- **Child labour:** we will eliminate child labour, where it exists, with a manner consistent with the best interests of the children concerned. Where relevant we will develop and participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child. We will not employ children and young persons under 18, at night or in hazardous conditions. In any event, the course of action we take shall be in the best interests of the child, conform to the provisions of ILO Conventions 138 and be consistent with the United Nations Conventions on the Rights of the Child.
- **Wages and hours:** Pay will not be lower than that required by local law or, in the absence of a law, the level paid generally within that industry. Hours of work will be in line with local law or, in the absence of a law, the norm within that industry and shall not be excessive, employees shall not be contractually required to work more than 48 hours per week and overtime will only be worked on an optional basis.
- **Diversity:** Whilst being sensitive to cultural differences we expect the development of equal opportunities in employment without discrimination on grounds of race, religion, and gender or any other arbitrary means.
- **Employment:** Forced or compulsory labour is prohibited. Employees should not be forced into involuntary labour and coercion at work is not acceptable. Financial penalty as a disciplinary sanction is prohibited. Permanent employment relationships and the obligations from such will not be unreasonably avoided. The employment models deployed will be in line with territory specific law and practices. Under these practices there will not be excessive use of alternative models such as sub-contracting or labour-only contracting.
- **Working conditions:** Policies and procedures for health and safety, as a minimum, meet legal requirements and where these do not exist, are sufficient to protect the well-being of employees.

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Freedom of association

We respect the right of our employees' to join or not to join a trade union and as such they are free to join an organisation of their choice to represent them in line with local legislation. Where local rights to Collective Bargaining exist it will be allowed.

As outlined in our Responsible Sourcing Policy, we also ensure that suppliers respect their employees' right to freedom of association.

Development of local communities

Through our community investment programmes, we strive to make a positive contribution and leave a lasting impact in the communities where our employees live and work. Our programmes vary between geographical location and look to address local need.

Communication and training

This Human Rights policy should be read and operates in conjunction with our:

- Prevention of Modern Slavery Policy
- Ethical Conduct Statement
- Responsible Sourcing Policy
- Statement of Business Principles
- Anti-bribery & Corruption Policy
- Equality and Diversity Policy
- Anti-Harassment and Bullying Policy
- Safety, Health and Environment Policy
- Speak-up Policy
- Open Door Policy.

Our intranet ensures all our employees have access to the same policies. This is supported by local micro-sites providing territory specific information which ensures that all of our businesses are comfortable with the standards and resulting action plans, in the UK and internationally.

In addition we have dedicated online mandatory training modules for Information Security, Equality & Diversity, Health & Safety, Data Protection, Information Security, Fraud Awareness and Anti-Bribery which highlight these policies for our employees. These are further embedded by local business units through comprehensive role specific induction and training which include a range of tailored tools for managers and directors.

Monitoring

Adherence with this and associated Group policies is the responsibility of business management and overseen through our Group-wide risk governance processes.

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Group Risk & Compliance provide further second line oversight on key Group policies, reporting back through Group governance with any issues arising. Group Internal Audit also check adherence to key Group policies through their audit activities.

Review

The policy will continue to be monitored and reviewed by the Corporate Responsibility Steering Group in respect of its suitability and effectiveness.

We also work in consultation with our stakeholders, particularly our clients, to make sure we are meeting their expectations.

1.3 CONTACTS

FOR FURTHER INFORMATION OR SHOULD YOU HAVE ANY QUESTIONS, PLEASE CONTACT THE CORPORATE RESPONSIBILITY TEAM BY EMAILING CORPORATE-RESPONSIBILITY@CAPITA.CO.UK

1.4 NON-COMPLIANCE

1.4.1.1 NON-COMPLIANCE WITH THIS POLICY MAY RESULT IN DISCIPLINARY AND / OR CRIMINAL PROCEEDINGS AGAINST THE WORKER, WHICH MAY INCLUDE THEIR MANAGERS.

2 DOCUMENT REFERENCES

Related Documents	Prevention of Modern Slavery Policy Ethical Conduct Statement Responsible Sourcing Policy Anti-bribery & Corruption Policy Equality and Diversity Policy Anti-Harassment and Bullying Policy Safety, Health and Environment Policy Speak-up Policy Open Door Policy
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3 DOCUMENT CONTROL

Document History

Issue	Date	Purpose	Author
1.0	01/03/2015	Final Version - Issued	Shona Nichols
2.0	25/08/2016	Reviewed and updated	Shona Nichols
3.0	23/01/2018	Reviewed and updated	Shona Nichols

Distribution (i.e. those who are to receive a copy once baselined)

Name	Organisation	Role
Capita Connections	Capita plc	Corporate Intranet

Reviewers (i.e. those who will review the product)

Name	Organisation	Role	Signature	Date
CR Steering Group Attendees	Capita plc	Functional heads for key areas in CR		

Product Approval (i.e. those who have final authority to approve the product)

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Nick Greatorex	Capita	Group Finance Director		