

Anti-Bribery and Corruption Standard Summary

Why is the standard required?	<p>The Anti-Bribery and Corruption Standard sets out Capita's stance on the implementation and management of anti-bribery and corruption measures across the group's business operations in accordance with the UK Bribery Act 2010. The standard applies to all Capita employees due to the global reach of the Act.</p>
What is bribery and corruption?	<p>Bribery is offering, promising, giving, accepting or soliciting any fee, gift, reward or other advantage as an incentive to do something which is illegal, unethical or a breach of trust.</p> <p>The UK Bribery Act makes it an offence to:</p> <ul style="list-style-type: none"> • Offer, promise or give a bribe, including facilitation payments or kickbacks (active bribery) • Request, receive or accept to receive a bribe (passive bribery) • Bribe a foreign public official • Fail to prevent a bribe (this is a corporate offence which makes Capita liable for bribery committed by associated persons).
What is Capita committed to do?	<ul style="list-style-type: none"> • Ensure that business is carried out ethically and not tolerate bribery and corruption • Maintain "adequate procedures" to prevent bribery which consist of: <ul style="list-style-type: none"> ○ tone from the top ○ due diligence on associated persons ○ policies and procedures ○ completing a risk assessment ○ communication (including training) ○ monitoring and review of bribery prevention controls. • Terminate a contractual relationship if an associated person gives or accepts a bribe • Remain an apolitical organisation and prohibit donations (financial or in kind) to political parties, individuals or campaigns • Retain all records in line with Capita's Data Retention Policy and Schedules.
What are employees and senior management required to do?	<ul style="list-style-type: none"> • Complete the Financial Crime training module on Capita Desktop within one month of joining and annually thereafter • Complete the advanced anti-bribery and corruption training within the Financial Crime module if you are exposed to a higher risk of bribery and corruption • Ensure gifts and hospitality are offered or accepted only in accordance with the Gifts and Hospitality Standard and recorded on the registers • Not make any facilitation payments unless they are faced with a threat, or fear of violence or loss of liberty when travelling abroad. • Senior management must also complete the Financial Crime Risk Assessment and report all bribery and corruption risks to the relevant governance forums.
What are third parties and other associated persons required to do?	<ul style="list-style-type: none"> • Notify Capita if any services will be delivered by another company, as part of the supply chain and declare conflicts of interests timely • Notify Capita, in accordance with current contractual requirements and as soon as reasonably practical under the relevant law, if suspected, prosecuted, charged with or convicted of any bribery related offences or corrupt practices • Not offer, receive or accept a bribe, including paying government officials to expedite certain requests e.g. licence, permit, visa or contract approvals • Not request government officials to make discretionary decisions which deviate from their standard procedures • Not request for compensation to be made in cash or to political parties.
Reporting	<p>All bribery and corruption incidents must be reported via Capita's Incident Reporting Process. Concerns can also be raised through the Speak Up mechanism.</p>
Non-compliance	<p>Non-compliance may result in disciplinary proceedings against the employee as involvement in bribery may result in fines, criminal proceedings and reputational damage for Capita.</p>