

## Anti-Bribery & Corruption Policy

We recognise the detrimental impact bribery and corruption has in society. This policy sets out what you should expect from us to operate transparently and with vigilance to deter and support the detection and investigation of bribery and corruption, whatever form it takes.

### We are committed to

- Operating our business in an honest, professional and ethical manner. We do not want to be party to bribery and corruption in any form.
- Complying with bribery and corruption laws worldwide.
- Ensuring that proportionate due diligence is conducted on all business relationships, including agents who act on our behalf.
- Ensuring that no person who works for us suffers any detrimental treatment:
  - As a result of refusing to take part in bribery or corruption.
  - Or raising any genuine concern of bribery or corruption in relation to our business.

### In line with our

- Code of Conduct.
- Gifts & Hospitality Standard.
- Conflicts of Interest Policy.
- Speak Up Policy.

### What you should expect from us

- We operate procedures across our businesses and functions in every country we operate to deter, detect and report bribery and corruption in accordance with:
  - The UK Bribery Act 2010 Guidance issued by the Ministry of Justice.
  - All additional legislation as this applies (e.g.US Foreign Corrupt Practices Act or Prevention and Combatting of Corrupt Activities Act in South Africa).
- Every division and function in Capita must:

Regularly review all risk factors relevant to the business's activities, third party relationships in place and countries operated in to ensure adequate bribery and corruption measures remain in place.

- Maintain a gifts and hospitality register and ensure that these are completed in line with the reporting and approval requirements of our Gifts and Hospitality Standard.
- Complete due diligence to avoid doing business with third parties involved in bribery and corruption.
- Ensure all payments are made or accepted in accordance with contractual obligations.
- We provide anti-bribery and anti-corruption training and guidance if you work for us.
- We do not tolerate facilitation of payments unless your personal safety is at risk.
- We prohibit any person working for us from making donations to a political party on our behalf.

### What we expect from you

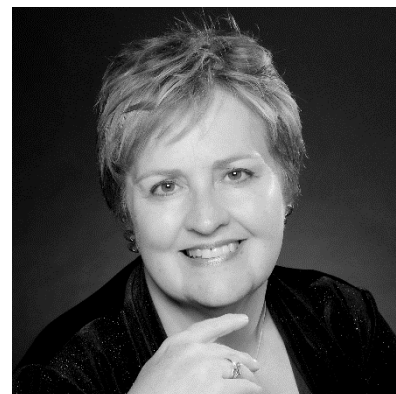
- To demonstrate the commitments of this policy and the requirements of our **Gifts and Hospitality Standard**.
- To complete all anti-bribery and corruption training that applies to you.
- To refuse any requests for facilitation payments unless you consider your safety would be at risk. In which case you must report the payment as soon as possible to the Risk and Compliance team.
- To speak up if you face a situation where you are not sure what to do or have a concern of bribery or anything corrupt or otherwise improper in relation to our business.
- Our **Speak Up Policy** sets out the channels available to you and no action will be taken against you if you report a genuine concern. Whether any concerns are proven or not.

### What we expect from our managers

- To ensure this policy is promoted and applied in the divisional or functional area you are responsible for.

### How we achieve this

- Every division and function in Capita must adhere to this policy, associated guidance and our Gifts and Hospitality Standard.
- This includes keeping under review risks which may prevent us from demonstrating the commitments of this policy and escalating and assisting with the investigation of any reported bribery and corruption concerns or incidents.
- Our management teams are supported by our Financial Crime Team who provide expert counsel and challenge to support decision making and the investigation of concerns raised in relation to this policy.
- We take policy non-compliance very seriously. Exceptions are reported and managed through our governance mechanisms, which ultimately includes to our Risk and Audit Committees.



Sue Williams  
Chief risk & compliance officer  
February 2019