



Speak Up policy

We are committed to high standards of corporate behaviour towards our people, customers, consumers, governments and the communities in which we operate. Openness is a core Value. This policy sets out our commitments to speaking up about serious concerns you have at work, also known as “raising concerns” or ‘whistleblowing’ and the channels available to do so responsibly and effectively, whether it is about a potential violation of the law or our Code of Conduct, Values, policies or anything which may be unethical.

This policy is to assist individuals concerned about malpractice or impropriety within, or involving Capita, or any of its companies. If you wish to raise a personal employment concern our employee grievance procedure should be followed in the first instance. Our grievance procedures are set out in our country employee handbooks.

We are committed to

- Acting in accordance with our legal, regulatory and professional obligations.
- 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. This includes but is not limited to:
 - 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.
- 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 you should expect from us

- We will protect any person who raises a concern from being at risk of losing their role or suffering any form of reprisal as a result.
- We will not tolerate:
- The harassment or victimisation of anyone raising a concern.
- Any attempt to bully 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.
- To inform you if we operate alternative or additional channels beyond those covered in this policy to raise concerns in the business area you work in. These may be in place to meet business and / or country specific legal, regulatory or professional obligations.

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, and it may be ignored. We want you to raise the matter while it is still a concern.
- To use the channels set out in this policy to do so.
- Or
- To use any alternative or additional channels that may operate in the business area you work in, to do so.

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.
- To promote and help foster a workplace environment that supports any person to speak up in good faith without fear of reprisal.

You can raise a concern under this policy by:

- **Contacting your line manager.** We would encourage you to do so as a first step. We recognise that this is not always easy, but our Manager Commitments support an open and transparent approach.
- **Contacting your HR business partner or a senior manager.** If you do not feel that you can talk with your line manager, then you can raise your concerns with your HR business partner or a senior manager.
- **Using our independent speak up facility – details on page 4.** If you wish to report a concern to someone independent of your business area you can use our independent Speak Up facility. The confidential Speak Up provider will initially notify the nominated Capita contacts of the concern and the appropriate Capita contact will determine the next steps.

For further information about our *Speak Up* facility you can contact:

- Claire Chapman, Chief General Counsel, Claire.Chapman@capita.co.uk
- Will Serle, Chief People Officer, Will.Serle@capita.co.uk
- Sue Williams, Chief Risk & Compliance Officer, Sue.Williams3@capita.co.uk

If you raise a concern

- Please provide as much detailed information as possible. Remember, the more information provided the more likely your concern can be properly reviewed.
- 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 review and final outcome.

You should *not* use this policy to:

- Report events presenting an immediate threat to life or property. Please follow your business emergency procedures.
- Report any grievances, you may have in relation to your terms of employment. Please follow our employee grievance procedure detailed in the country employee handbook relevant to where you work.
- Settle personal or legal disputes.

- Make accusations which you know are false. Doing so may lead to disciplinary measures.

Raising a concern to a prescribed person or body

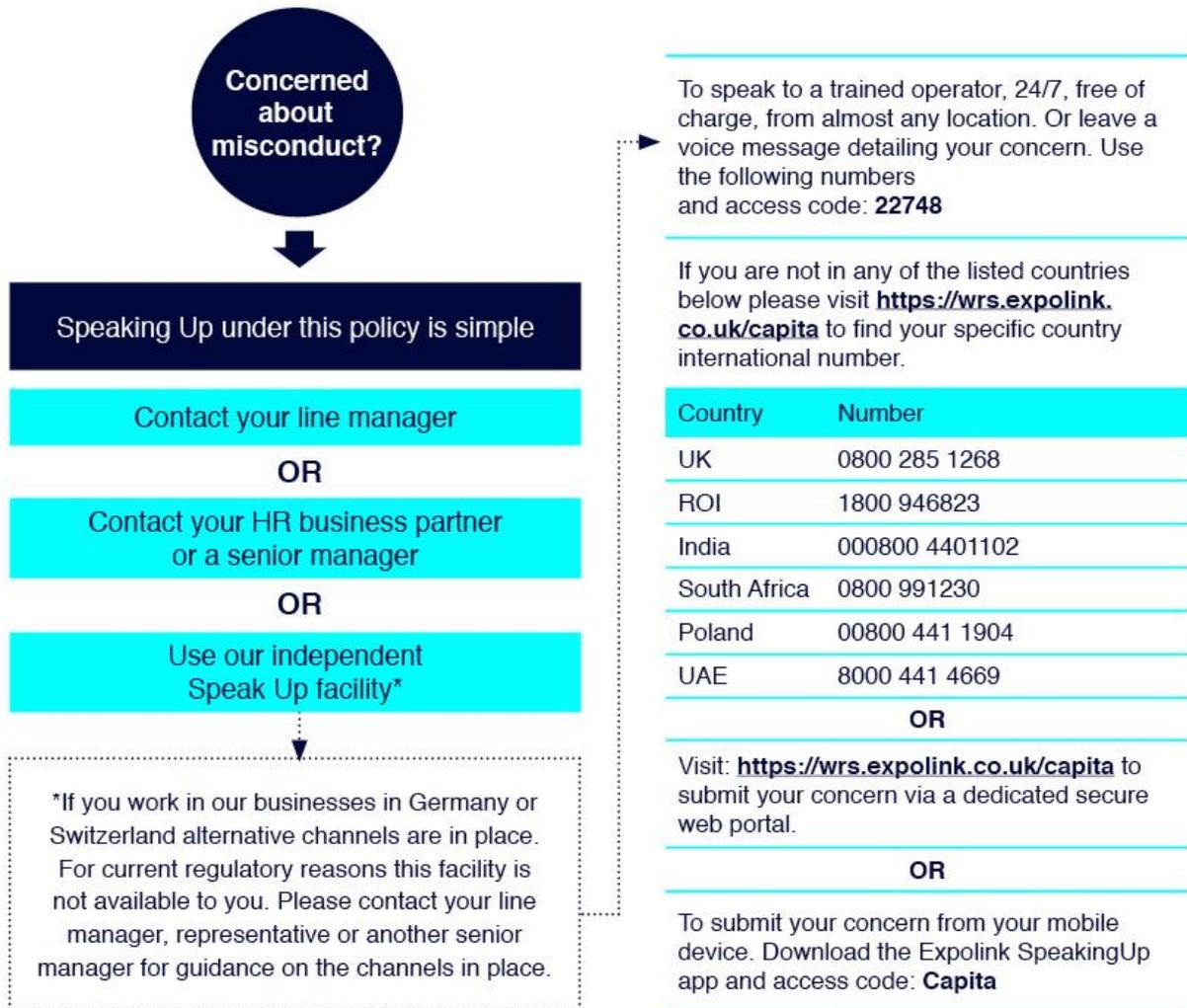
- You may also be able to report your concern to a prescribed person or body rather than to us.
- You must make sure you choose the correct person or body for your issue.
- Further guidance and a list of UK prescribed persons / bodies is available from www.gov.uk/whistleblowing.
- If you work in our financial services regulated businesses and are a UK based colleague, the Financial Conduct Authority (FCA) or Prudential Regulation Authority (PRA) which regulate some of Capita's businesses are the prescribed bodies for these firms.
- You do not need to have raised your concern internally before you contact either the FCA or PRA and you do not have to tell us that you have raised a concern with them. You can also raise a concern with both Capita and the FCA and/or PRA at the same time. **Only UK based employees may report to the FCA/PRA.**

- **FCA** – whistle@fca.org.uk
+44 (0)20 7066 9200
Intelligence Department (Ref PIDA),
Financial Conduct Authority,
12 Endeavour Square, London, E20 1JN
- **PRA** – whistleblowing@bankofengland.co.uk
+44 (0)203 461 8703
Confidential reporting (whistleblowing),
PRA, 20 Moorgate, London EC2R 6DA.



Claire Chapman
Chief General Counsel
July 2019

Speak up Channels



Further information

Policy Zone: [link](#)

Speak Up Policy: if you have a concern that The Code is not being followed or our values and behaviours are not being properly demonstrated.

Employee Handbook: for more details on how on our employee grievance procedures.

Contacts:

Claire Chapman, Chief General Counsel,
Sue Williams, Chief Risk and Compliance Officer,
Will Serle, Chief People Officer