

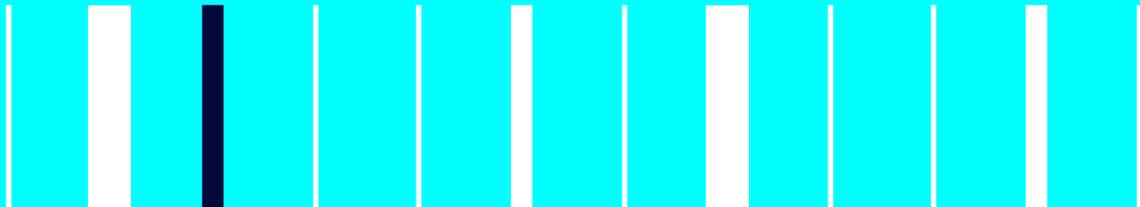


# The Code

Capita's Code of Conduct

August 2020 Version 1.1





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# Why The Code matters.



**“Our purpose – we create better outcomes – is the reason we exist. It guides our decisions and actions and encapsulates what we do at Capita every day.”**

Our purpose – we create better outcomes – is the reason we exist. It guides our decisions and actions and encapsulates what we do at Capita every day. It helps motivate and inspire us to go above and beyond for our clients, employees and suppliers.

I'm proud to introduce The Code which supports our purpose and values. The Code describes what we must do and how we must behave to ensure we have the trust of all of our stakeholders. We will create better outcomes in the right way, not at any cost, in line with our purpose and values.

The Code applies to everyone who works at, or with, Capita – employees, contractors and suppliers.

Please read The Code, understand it and follow it. We are personally and collectively accountable for the actions we take and must apply our judgment when deciding what to do and how to do it. The Code is a framework of common shared practices and sets the standard for the behaviour we can all ask of, and expect from, every person working for and with our businesses, anywhere in the world. You may have additional policies you need to follow, depending on where you work, or the type of market you operate in. But The Code is the benchmark for all of Capita, the standard we all must achieve in what we do.

You should return to The Code if you are ever in doubt about the right thing to do or when faced with an ethical dilemma or legal concern.

Equally, if you see or hear anything that is, or may be, contrary to our values, The Code or its supporting policies, standards and procedures, please speak up. You can raise your concern to your line manager, a senior manager or contact your HR business partner. Alternatively, you can use our Speak Up facility to report your concerns independently and confidentially.

By being true to our values and complying with The Code, we will demonstrate our commitment to creating better outcomes across Capita.

A handwritten signature in black ink, appearing to read 'Jon Lewis', with a stylized, cursive script.

**Jon Lewis**  
Chief Executive Officer

# About the code.

1

**Our purpose, values and behaviours, and the 8 Managers' Commitments, combine to govern how we do things here at Capita and how we should act.**  
The Code builds on those foundations.

2

**It summarises in one place elements of our key policies, and the standards and procedures which support them, so you are clear about what you must do.**  
Please read those documents too and refer to them when you have to make difficult choices or decisions or just to remind you of the way we do things.

3

**The Code applies to everyone who works for, and with, Capita. We apply our values consistently across Capita.** This means that we abide by standards which are in many cases higher than the laws and regulations that apply to our business.

**4**

**We expect contractors, suppliers, agents (and their employees) to act in line with The Code, so please make any third parties you work with aware of it and our expectations.** We will not work with businesses or people and partners who do not meet its standards. Our Supplier Charter additionally sets out what we expect from third parties who provide services to us.

**5**

**We will take action, which could lead to dismissal,** against colleagues who do not follow The Code.

**6**

**We are all responsible for upholding these high standards so let's work together and hold each other to account.** We will benchmark our performance against our purpose and how we demonstrate our values.

# What we all must do.



Behave in an ethical manner and take pride in our decisions, behaviour and actions.



Follow The Code – it's how we do things – and includes legal, professional and regulatory obligations you must meet.



Complete all mandatory training in the timescales set



Support our commitments to health, safety, welfare, security, the environment and our communities.



Recognise The Code does not cover everything and use our judgment to make ethical decisions.



Head for **The Policy Zone** to read the policies that are covered in The Code and the procedures that support them.



Ask for help if you are unsure.



Speak up if you are not sure how to apply The Code or if something does not feel right.



**When we make decisions,  
always ask ourselves:**

- Does it help us to create better outcomes?
- Does it adhere to our values and our behaviours?
- Does it comply with our policies and the standards and procedures which support them?
- Is it legal?
- Is it fair?
- Could this harm our reputation?
- Am I setting a good example?

# How we act.

Our purpose – **we create better outcomes** – guides all we do. We may operate in different parts of Capita, and under different brands. But we remain “One Capita”, united by our common purpose and values.

Here is a reminder of our values, behaviours and our 8 Managers' Commitments that underpin how we act.

## Our VOICE Capita values

VALUES	OPEN	INGENIOUS	COLLABORATIVE	EFFECTIVE
V	O	I	C	E
<b>Our values define who we are as an organisation</b>	We are honest, transparent and respectful	We think about what's possible	We achieve more when we work together	We care about doing the best job we can

If you are a manager, you also need you to:

- Ensure your team has read and understood The Code.
- Hold your team to account in acting in accordance with The Code as underpinning our values and behaviours.
- Be a role model.
- Make sure your team feels they can speak up if they have concerns, in confidence and without fear of reprisal.

Find out more here: [Managers' Commitments link](#)

### Capita Managers' Commitments

**As a manager of people, processes or projects, each manager commits to:**



Lead by example by demonstrating the Capita purpose, behaviours and Code of Conduct.



Inspire and develop those I work with, helping to build their skills, trust and confidence



Set the direction by making sure everyone knows what our goals and priorities are, and how their work relates to the business strategy



Increase diversity and develop an inclusive culture where people enjoy their work



Be honest with all stakeholders about our strengths and weaknesses as a business



Create an environment where no harm comes to anyone



Be accountable for the actions of my team



Recognise and celebrate good work

# Speak up.

A core value at Capita is openness. If you face a situation where you have a concern that The Code is not being followed or our values and behaviours are not being properly demonstrated, you must report it. We must show the courage to challenge actions, decisions or behaviours that we believe to be wrong. We must also listen to others and be open to challenge from them. No action will be taken against you if you raise a genuine concern, whether proven or not. If you have an employment related question or grievance, it may be more appropriate to use our grievance procedure set out in our Employee Handbook.

Our **Speak Up Policy** sets out the channels available to you to do so. These include:

- Contacting your line manager. We recommend that this should be your first step where you are comfortable to do so. We recognise that this is not always easy, but our Managers' Commitments support an open and transparent approach.
- If you do not feel that you can talk with your line manager, then you can raise your concerns with your local HR business partner or senior manager.
- If you wish to report a concern through our independent speak up facility you can do so via the contact methods on the opposite page.
- To report events presenting an immediate threat to life or property. Please follow your business emergency procedures.
- If you raise a concern:
  - your confidentiality will be protected and we will keep you informed of the steps we will take to review your concern and the outcomes where we are permitted to do so.
  - please provide as much detailed information as possible. 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 would help the review. Remember the more information provided the more likely your concern can be properly reviewed.

Concerned  
about  
misconduct?

Speaking Up under this policy is simple

Contact your line manager

OR

Contact your HR business partner  
or a senior manager

OR

Use our independent  
Speak Up facility\*



\*If you work in our businesses in Germany or Switzerland alternative channels are in place. For current regulatory reasons this facility is not available to you. Please contact your line manager, representative or another senior manager for guidance on the channels in place.

**Visit:** <https://capita.whispli.com/speakup>

If you would rather report your concerns via our toll-free telephone hotline please use the numbers below:

Country	Number
Europe & South African offices: (covering UK hours of 8am-5pm)	00800 180 620 19**
Indian offices (covering Indian hours of 8am-5pm)	(to be confirmed – please use the reporting portal or Whispli app in the interim)

\*\*operational from 11 August 2020

Or download the Whispli Speaking Up App and use 'capita.whispli.com' to find your organisation. Once you have logged a case, an organisation code will be provided to you to track your report.

### 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,  
Will Serle, Chief People Officer

# Our People.

## We put people first.

### Inclusion and wellbeing

#### Our policy overview

Diversity will strengthen Capita. We value people's backgrounds and experiences. We expect everyone we work with to behave in a way that promotes inclusion and fairness. We value human rights and treat people with dignity, care and respect. Colleagues' wellbeing is important, and we will create a discrimination-free workplace and do not tolerate anyone being harassed or bullied for any reason. We will recruit, promote, train, develop and reward people based on clear evidence of what they do and how they act.

#### Our conduct

- Embrace inclusive practices so that everyone at Capita feels valued and welcomed.
- Treat others with respect, dignity and courtesy, and expect that back.

- Be open – listen and learn from colleagues – and when you disagree, avoid ridicule, criticism or causing embarrassment.
- Encourage honest and open conversations and be willing to accept, and act on, constructive feedback.
- Evaluate and compensate performance on the basis of how objectives are met, as well as what is delivered.
- Speak Up if you experience or see discrimination here or if you see or hear anything that does not promote inclusion and wellbeing. We will deal with it.

#### Further information

**Policy Zone:** [link](#)

**Contacts:** Jennie Colville,  
Director of Responsible Business

**Speak Up:** refer to page 13 in this document for your local contact information.

## Discrimination, bullying and harassment

### Our policy overview

We treat people with care and respect and work collaboratively to create a positive and respectful working environment. We do not tolerate abuse, harassment, bullying or discrimination of employees, contractors, customers, suppliers or anyone else we deal with. It is zero tolerance at Capita when it comes to any form of discrimination.

### Our conduct

- Be sensitive to the impact behaviour and actions can have on others and be kind.
- We take a no-tolerance approach to bias, bullying or harassment, but know that if anything makes you feel uncomfortable, it's not ok. Do not accept it.
- Speak Up if you experience or see discrimination here. We will deal with it.

## Drugs

### Our policy overview

We do not tolerate the sale or distribution of illegal substances or misuse of drugs including alcohol

### Our conduct

- We do not misuse alcohol or drugs and we report colleagues we think might be under the influence.
- Try to support anyone who you suspect might have a drug or alcohol problem.
- Encourage people to use our Employee Assistance Programme – available free to all employees.
- Read the related guidance in the employee handbook for your area.
- Report anything illegal to your manager, or your local HR business partner or use our Speak Up facility.

### Further information

**Policy Zone:** [link](#)

**Employee handbook:** [link](#)

**Contacts:** Your local HR Business Partner, Will Serle, Chief People Officer or Claire Chapman, Chief General Counsel.

**Speak Up:** refer to page 13 in this document for your local contact information.

## Health and Safety

### Our policy overview

We do not compromise on health and safety and are all responsible for ensuring the health, safety and welfare of colleagues, contractors and visitors. We must abide by laws and regulations and expect our contractors and suppliers to follow our policies and requirements.

### Our conduct

- We provide a safe and healthy working environment. We recognise that a work/home balance aids overall health, wellbeing and productivity.
- We always make sure we have had any necessary training; we have planned properly and have the right equipment.
- We promptly report incidents, 'near misses' or other health and safety concerns to our line manager and Health and Safety representative or use our Speak Up facility.



### Further information

**Policy Zone:** [link](#)

**Contacts:** Marisca Bosman, Director of Health and Safety

**Speak Up:** refer to page 13 in this document for your local contact information.

## Conflicts of interest

### Our policy overview

We raise and report any personal or professional interests or activities that could affect business interests and the ability to make clear, objective decisions for Capita. Here are some examples of potential conflicts of interest.

Conflicts	What you need to do
Working on an external business activity, such as on another company's board, which means you can't devote appropriate time to your Capita role	Check with your line manager if it's acceptable and, if so, agree the scope of extra activities.
Recruiting or managing a relative or partner	Tell your line manager to see if alternative arrangements can be made.
Engaging a supplier you know, which influences your decisions	Talk to your line manager before using the supplier.
Making a corporate donation to a charity you are a trustee of	Get approval from your line manager before donating.  Let Jennie Colville, Responsible Business Director, know of any donations that are £5,000 or above.

### Our conduct

- Act in the business' best interests.
- Remove yourself from business situations where you have a conflict of interest.
- If you are aware of a conflict, disclose the details in line with your local procedure. Raise it and agree how the conflict can be managed to protect you and Capita.
- Get approval from your line manager in line with your local procedure as above so that you and Capita are protected.

### Further information

**Policy Zone:** [link](#)

**Contacts:** Claire Chapman, Chief General Counsel

**Speak Up:** refer to page 13 in this document for your local contact information.

# Our Business.

## Responsible business

**We are committed to being a responsible and sustainable business and doing the right thing for our people, our communities and our environment.**

### Our policy overview

Community investment: We support our communities through volunteering and fundraising and encourage colleagues to tackle local socio-economic issues by sharing skills and experience. Everyone has one paid day a year to volunteer. We offer a matched funding scheme and payroll giving scheme (UK only) so employees can support causes close to their hearts.

## Environment

We are committed to understanding and thinking about how we can use our resources wisely and deliver our services to clients in an environmentally sustainable way. We measure, manage and monitor our environmental performance to see how we can continually improve and maximise our positive impacts. We comply with all relevant environmental legislation and regulations and seek to prevent pollution to air, land and water wherever possible. We encourage all our businesses to be environmentally responsible and rely on our people to work in an environmentally sustainable way. **Human rights:** We believe human rights are basic rights. Every individual should have the freedom to lead a dignified life, free from fear or want, and be free to express independent beliefs. We have zero tolerance for modern slavery, forced or compulsory labour and human trafficking. We are committed to running our business in line with the principles of human rights set out in the United Nations' Universal Declaration of Human Rights (UNUDHR) and the International Labour Organisation (ILO) fundamental conventions on labour rights.



### Our supply chain

We are careful and fair about how we select and use suppliers and other business partners. We work with suppliers and partners who share our commitments to safety, integrity and human rights and The Code's principles. We seek out suppliers who have the same ethical principles as us and work with them to improve the sustainability of what we buy.

### Our conduct

- Ensure you are familiar with our Responsible Business Strategy and associated policies and procedures as it's important we are all clear about the commitments we have made and how we can contribute.
- All suppliers must adhere to our Supplier Charter, which sets out our commitments and expectations, and comply with all relevant geographical regulations.

### Further information

**Policy Zone:** [link](#)

**Contact:**

Jennie Colville,  
Director of Responsible Business

**Speak Up:** refer to page 13 in this document for your local contact information.

## Business travel and expenses

### Our policy overview

When we plan to travel, we balance the business need, environmental impact, financial cost and the health and wellbeing of our employees.

### Our conduct

- Follow your local policy. Ensure you have the necessary approvals from your line manager.
- Have a cost-conscious approach and only claim expenses which are reasonable and necessary and in line with your applicable expenses policy.
- Think about your impact on the environment – do you need to travel, or could you use technology to connect and collaborate?
- Think about your wellbeing and that of anyone reporting to you – do you or they need to travel or could you use technology to connect and collaborate?



### Further information

**Policy Zone:** [link](#)

**Contact:** Your divisional finance director

**Speak Up:** refer to page 13 in this document for your local contact information

## Anti-bribery and anti-corruption

### Our policy overview

We are committed to avoiding all forms of bribery and corruption and complying with associated laws, supporting efforts to eliminate bribery and corruption worldwide and we encourage our suppliers, customers and partners to do the same. The UK Bribery Act applies throughout our global operations (as well as any local legislation). We do not accept bribes in cash, hospitality, gifts or facilitation payments. Local practices and customs do not create an exception to our approach. If you want to engage with third parties, to act on Capita's behalf, our anti-bribery rules apply equally to any supplier, third party agent or introducer too, and appropriate due diligence must be carried out before you engage with them. Ensure any contractual agreements contain appropriate anti-corruption and anti-bribery clauses, and any required training is provided.

### Our conduct

- Always know who you are doing business with and perform and update relevant due diligence on business partners, agents and suppliers.
- Comply with Capita's Anti-Bribery and Corruption Policy and any applicable local policy and/or legislation.
- Document any engagement with an agent, third party provider or introducer and include appropriate anti-bribery and anti-corruption commitments.
- Never offer, or accept, any improper payments or other advantage to or from third parties, including facilitation payments.

### Further information

**Policy Zone:** [link](#)

**Speak Up:** refer to page 13 in this document for your local contact information.

## Gifts and entertainment

### Our policy overview

Reasonable hospitality and gifts help us to establish and develop business relationships, but anything inappropriate or excessive can be viewed as an unfair business advantage or bribery. We are committed to following high legal and ethical standards and showing independence. We declare gifts and hospitality and are open and honest about our activities.



### Our conduct

- Ensure you have read and follow Capita's Gifts & Hospitality Standard and any local requirements that apply.
- Take care when offering, promising, giving or accepting gifts and never offer or accept cash gifts.
- Ensure any gifts or hospitality do not influence the recipient to act improperly or award us any business – financial or otherwise.
- Make it clear that accepting any hospitality will not influence your decision-making or business judgment.
- If a public official is involved, check for any applicable rules and guidance as there is a heightened risk of perceived bribery.
- Get prior approval for and record gifts, entertainment and hospitality (given or received) in line with your local procedures.
- Discuss any concerns with your line manager or the Risk and Compliance Team.

### Further information

**Policy Zone:** [link](#)

**Speak Up:** refer to page 13 in this document for your local contact information

## Political donations

### Our policy overview

Capita is a politically neutral organisation and does not campaign politically or make any political donations. We do not support any political party, group or individual.

We conduct regular dialogues with government on issues relevant to our businesses and ensure that any communication is honest, unbiased and accurate.

### Our conduct

- Any personal involvement in political activity must be kept separate from your duties as a Capita employee.
- No contributions or expenses to business accounts can be used for any political campaign, political party or candidate (or any affiliated organisations).
- Capita resources cannot be used to promote any political campaign, political party or candidate or any of their affiliated organisations. This includes time, meeting space, telephones and other services.
- You cannot coerce or pressurise colleagues to make political contributions.
- We do not pay fees to political speakers (including former politicians and government officials such as elected officials, heads of state, cabinet secretaries) without approval from our CEO or CFO.
- Central bankers, chief economists, political journalists and political academics can be paid a fee.
- Political speakers who do not receive a fee are allowed and we will pay reasonable expenses or travel and accommodation but are shown no bias or preferential treatment.
- You must follow your local standard events procedures for speaker fees for non-political events.

### Further information

**Policy Zone:** [link](#)

**Contact:** Claire Chapman, Chief General Counsel or Francesca Todd, Group Company Secretary

**Speak Up:** refer to page 13 in this document for your local contact information.

## Anti-money laundering, terrorist financing, sanctions, fraud and facilitation of tax evasion

### Our policy overview

We share a legal, regulatory, ethical and social responsibility to protect our customers and clients and others we do business with. We have a zero tolerance to fraud and other dishonest activities.

We will restrict criminal access to our markets and systems and support wider crime prevention. We will work to ensure our products and systems do not:

- Help criminals to launder or hide the proceeds of crime.
- Finance terrorism.
- Facilitate tax evasion.
- Aid and commit fraud.
- Bypass trade sanctions laws, including trade embargoes.

### Our conduct

- Read and follow our Financial Crime policy and the standards and procedures which support us to prevent, detect, investigate and report financial crime.
- Read and review our trade sanctions policy and the procedures we employ to ensure that we comply with trade sanctions applicable to where we do our business.
- Raise concerns and cooperate with any legal enquiries.
- Immediately refer any enquiries from regulators or public authorities on anti-money laundering, terrorist financing, fraud and facilitation of tax evasion to [groupfinancialcrime@capita.co.uk](mailto:groupfinancialcrime@capita.co.uk)
- Refer any queries on trade sanctions to the Chief General Counsel or Group Legal Team, do not comment unless you are cleared to do so unless relevant regulation prevents you from doing so.

### Further information

**Policy Zone:** [link](#)

**Contact:** Group Financial Crime Prevention team [groupfinancialcrime@capita.co.uk](mailto:groupfinancialcrime@capita.co.uk)

**Sanctions:** Claire Chapman,  
Chief General Counsel

**Speak Up:** refer to page 13 in this document for your local contact information

## Fair competition

### Our policy overview

Free and fair competition is important and most markets where we operate will have rules and regulations designed to protect this. We believe in competing fairly with our competitors and dealing fairly with customers and suppliers. We comply with all competition laws (also known as anti-trust laws) in markets where we operate. Examples of anti-competitive practices include:

- Sharing competitive information with competitors, particularly prices, costs and sales volumes.
- Agreeing with competitors to fix the prices of products or services including rebates, discounts and commissions; or divide up certain regions, markets or accounts between us.
- Agreeing with resellers and distributors to fix the minimum resale price of any products or services.

### Our conduct

- Understand basic competition law and if in doubt, speak to the Legal Team.
- Never seek, accept or discuss confidential information with competitors.
- Do not encourage customers, suppliers, or former employees of competitors to provide information they should keep confidential.
- Report any issues to the Legal Team such as requests for information; notifications of investigations and enquiries from competition/anti-trust authorities and legal action which is wholly or partly based on alleged competition infringement.
- Do not contact competition authorities without first consulting the Legal Team.
- Raise any potential competition/anti-trust law concerns with the Legal Team and contact them if a competitor discloses confidential information to you, directly or indirectly, outside of approved arrangements.

### Further information

**Policy Zone:** [link](#)

**Contact:** Claire Chapman, Chief General Counsel

**Speak Up:** refer to page 13 in this document for your local contact information.

## Regulatory investigation

### Our policy overview

Our businesses are regulated in several different ways, including financial and governmental regulators. We comply with all relevant laws and regulations and are open and transparent with our regulators. Colleagues must participate openly and constructively in any investigations.



### Our conduct

- Fully cooperate with any internal or external investigations or reviews (including governmental or regulatory bodies).
- It could be a criminal offence and may lead to disciplinary action, including dismissal, if you fail to cooperate.
- Comply with all relevant business specific policies and Capita-wide policies on reporting or complying with internal or external investigations.
- Comply with all relevant regional or global policies which set out regulatory or Capita requirements.
- Tell your line manager immediately if you're involved in any external investigation, whether as the subject or as a contributor, unless the law or regulation prohibits you from doing so. You, or your line manager, must also notify the Chief General Counsel (again, if it is not prohibited).
- Make sure relevant information you have is maintained and is not withheld, tampered with or altered and be open and honest about how we record and report information.

### Further information

**Policy Zone:** [link](#)

**Contact:** Claire Chapman,  
Chief General Counsel

**Speak Up:** refer to page 13 in this document for your local contact information

## Insider dealing

### Our policy overview

It is illegal to share, or use for gain confidential or financial information of Capita or to deal in Capita or third-party securities or shares that amounts to inside information. This includes information that is not generally known and that could have a significant impact on the price or value of Capita if made public. This can include dividend amounts, Board or Executive Team appointments or departures, profit warnings and major business developments, including contract wins or losses.

We take insider dealing extremely seriously and individuals found guilty of insider dealing can be fined and imprisoned.

### Our conduct

- You have a duty of confidentiality, are responsible for ensuring only authorised people have access to confidential information and must not disclose confidential information without authorisation.
- Use all appropriate measures to ensure information confidentiality.
- If you have any concerns or questions, please raise with the Legal team or Company Secretariat team without delay.

### Further information

**Policy Zone:** [link](#)

**Contact:** Claire Chapman,  
Chief General Group Counsel or  
Francesca Todd, Group Company Secretary

**Speak Up:** refer to page 13 in this document for your local contact information.

## Contracts, expenditure and delegation of authority

### Our policy overview

We expect you to show integrity and careful judgment when spending company funds. The misuse of company resources and assets is strictly forbidden. You must never commit your business to contractual obligations unless you are authorised to do so.

We have a formal delegation of authority approach. This sets out who can authorise expenditure, up to specific limits and separately, who can sign contracts.

### Our conduct

- If you have not been granted formal authority to sign contracts on behalf of your company, or business area you cannot sign the contract. Explain to the customer, supplier or other third party that we have a process which must be followed and wait until an approved person can sign.
- You may have authority to approve expenditure, in line with our delegation of authority matrix. You may only approve up to the specific limit granted. This authority may be separate from your authority to sign a contract.
- If you are not sure if you have approval authority, contact your line manager or your Divisional Finance Director.

### Further information

**Policy Zone:** [link](#)

**Contact:** Rob Tolfts, Group Commercial Director

**Speak Up:** refer to page 13 in this document for your local contact information

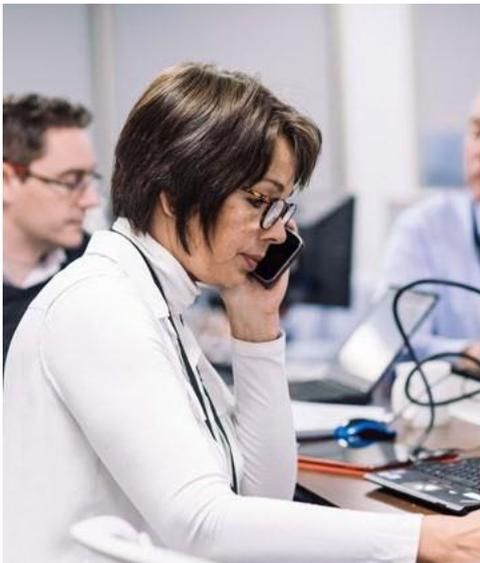
# Our assets and information.

## We protect our assets and the information and data we hold

### Brand

#### Our policy overview

As well as the main Capita brand, we own many other brands which are equally valuable. We protect all our brands and use them consistently.



### Our conduct

- Comply with our brand policies and guidelines.
- Report any suspected misuse of any of our brands, or our brand policy
- Do not allow any third party to use our name, or any other brand, without permission from Marketing and a licence agreement from Legal.
- Do not use the company brands for something which is not official company business.

### Further information

**Policy Zone:** [link](#)

**Contact:** Antonia Wade, Chief Marketing Officer

**Speak Up:** refer to page 13 in this document for your local contact information

## Intellectual Property and Confidential Information

### Our policy overview

We protect the unique and valuable brands and ideas that our businesses create – our Intellectual Property (IP), whether protected by copyright, patents, trademarks, confidentiality and trade secrets or other forms of IP protection, anywhere in the world we do business.

We also ensure that we use the IP of other businesses in the way that we are authorised to do so.



### Our conduct

- Pass all IP related queries to your Legal Team and let the team know if you think our brand or IP is being misused.
- Do not use the IP, brands or logos of another organisation without their written permission.
- Protect confidential information and IP. Enter into non-disclosure agreements before sharing confidential information or IP. Ask your Legal team for the appropriate agreement.
- Comply with any agreements with partners, customers and others about contract announcements and the use of their name and IP.
- Do not release information about finances, new products, services or contracts without approval from your line manager or communications lead.

### Further information

**Policy Zone:** [link](#)

**Contact:** Claire Chapman,  
Chief General Counsel

**Speak Up:** refer to page 13 in this document for your local contact information

## Communications

### Our policy overview

*External communications:* We communicate openly and transparently with our stakeholders, including our people, customers and shareholders. We maintain Capita's reputation by building and maintaining relationships with our key stakeholders, both in the public and the private sector. We protect disclosure of our information and limit access to those who need to know it. We will provide timely, accurate and complete information to the public. At the same time, we uphold our obligations to keep certain information confidential and to prevent disclosure, including selective disclosure, of financial and/or inside information that could impact our share price.

*Internal communications:* Our communications, both written and verbal, should be clear, accurate, consistent and responsible. We share open, timely information with colleagues about what's happening in our business and ask for views and feedback.

*Social media:* Sites like Twitter, Facebook and LinkedIn, are opportunities for us to promote Capita and its businesses, people and values. We encourage colleagues to take part in the social conversation, share experience and be proud of achievements and share experiences.

### Our conduct

- Be professional when you represent us and do not say things that could adversely affect Capita.
- Respect your audience and never use insulting, obscene, defamatory, inflammatory or discriminatory language.
- Follow our editorial guidelines. If you are not sure, talk to Corporate Affairs or your local communications lead.
- Do not make comments to the media, industry analysts, government on behalf of Capita and our businesses unless you have had approval to do so.
- Be sensible if you discuss work on personal social media sites. Remember you are a brand ambassador and should always uphold our values and protect our reputation.
- If you draft internal communications, think about how it could be perceived if it was disclosed externally – it should be carefully and consistently drafted to align with our key external messages.
- Remember our obligations as a listed company to ensure that we disclose information lawfully.

### Further information

**Policy Zone:** [link](#)

**Contact:** Katja Hall, Director of Corporate Affairs

**Speak Up:** refer to page 13 in this document for your local contact information.

## Information security

### Our policy overview

We expect high standards of information security, regardless of whether information is ours, our clients, or people outside of Capita. We are committed to maintaining the confidentiality, integrity and availability of information, protecting information assets and raising and maintaining security awareness.

### Our conduct

- Ensure you have read and fully understood Capita's Information & Cyber Security policy and Acceptable Use Standard.
- Work within and follow the requirements of Capita's Security Standards which support and relate to your role and your responsibilities.
- To remain vigilant to security threats and always protect all information in your care.
- Report all security incidents and inform your manager if you suspect anything which may compromise security or informational assets.



### Further information

**Policy Zone:** [link](#)

**Contact:** Paul Key, Group  
Chief Information Officer

**Speak Up:** refer to page 13 in this document for your local contact information

## Privacy

### Our policy overview

We respect the privacy of individuals and process information accordingly. When we process personal information (including sensitive personal data), we follow all applicable laws on the collection, storage, use, retention, transfer and deletion of personal information.

We only collect and process personal data for lawful purposes and keep it for only as long as it is strictly necessary. We only share personal data for legitimate business or legal reasons and ensure it's transferred following data privacy laws and that recipients understand they too must protect the data. We let all those we work with know about the importance of data privacy. We respect the rights we all have to review, update and correct our personal information.

### Our conduct

- Follow the procedure, guidance and standards produced by the Privacy Team.
- Only collect and use personal information fairly and lawfully.

- Make sure that personal information is kept secure, accurate and up to date.
- Respect individuals' rights. For example, provide a copy of requested information, stop marketing on request, and correct or remove wrong information.
- Only disclose personal information to those who are authorised to receive it.
- Avoid holding excessive amounts of information or keeping it longer than is necessary.
- Report any incidents involving personal information immediately – into Protiviti, our online reporting tool or to your Data Protection Lead or the Group Data Privacy Officer.
- Do not make any notifications to the Regulator (ICO or equivalent) without consulting and having the approval of the Group Data Privacy Officer or Chief General Counsel.
- Complete data protection training at least annually.
- Get advice from the Privacy Team if you are unsure.

### Further information

**Policy Zone:** [link](#)

**Contact:** Jenny Coombs,  
Group Data Privacy Officer

**Speak Up:** refer to page 13 in this document for your local contact information.

## Contacts

<b>Title</b>	<b>Name</b>	<b>Email</b>
Chief People Officer	Will Serle	Will.Serle@capita.com
Chief General Counsel	Claire Chapman	Claire.Chapman@capita.com
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Chief Financial Officer	Patrick Butcher	Patrick.Butcher@capita.com
Head of Responsible Business	Jennie Colville	Jennie.Colville@capita.com
Group Data Privacy Officer	Jenny Coombs	Jenny.Coombs@capita.com
Group Commercial Director	Rob Tolfts	Rob.Tolfts@capita.com
Group CIO	Paul Key	Paul.Key@capita.com
Director of Corporate Affairs	Katja Hall	Katja.Hall@capita.com
Director of Health and Safety	Marisca Bosman	Marisca.Bosman@capita.com
Chief Marketing Officer	Antonia Wade	Antonia.Wade@capita.com

## Further information

**Our policies and the standards and procedures which support them provide more on what you have read here. They set out the control objectives, principles and other core requirements for Capita's activities.**

**Unless there are specific regulatory or statutory requirements in particular jurisdictions, all policies are expected to apply Capita-wide. You can find them in The Policy Zone. If you do not have access, your line manager can help ensure you get copies. Publicly available policies can also be found at [www.capita.com](http://www.capita.com).**

A list of policies, standards and procedures referenced in The Code is shown below:

### **Here are the policies, standards and procedures covered in The Code:**

- Anti-Bribery and Corruption Policy
- Brand, Editorial and Trademark and Copyright Guidelines
- Business Travel and Expense Policy
- Community and Charity Policy and Standard
- Conflicts of Interest Policy
- Dawn Raid Policy
- Diversity and Inclusion Policy
- Financial Crime Policy and Standards
- Gifts and Hospitality Standard
- Grievance Procedure (see Open Door Policy)
- Health, Safety and Environmental Policy and Standard
- Human Rights Policy
- Information and Cyber Security Policy and Standards
- Privacy Policy and Standards/Procedures
- Procurement Policy and Supplier Charter
- Social Media Policy
- Speak Up Policy
- Third Party Information Requests Procedure
- Sanctions Policy

