

# Code of Conduct



# Contents

**03    Why the Code Matters**

- 04    About the Code
- 05    What we all must do
- 07    How we act
- 09    SpeakUp

**12    Our People**

- 12    Wellbeing and health
- 13    Engagement and inclusion
- 14    Anti-Racism, discrimination, harassment and bullying
- 15    Drugs
- 16    Health and Safety
- 17    Conflicts of interest

**19    Our Business**

- 19    Responsible business
- 19    Our supply chain
- 21    Business travel and expenses
- 22    Anti-bribery and anti-corruption
- 23    Gifts and entertainment
- 24    Political donations
- 25    Anti-money laundering, terrorist financing, sanctions, fraud and facilitation of tax evasion
- 26    Fair competition
- 27    Regulatory investigation
- 28    Insider dealing
- 29    Contracts, expenditure and delegation of authority

**30    Our Assets and Information**

- 30    Brand
- 30    Intellectual Property and Confidential Information
- 32    Communications
- 34    Information security
- 35    Privacy
- 36    Contacts
- 37    Further information

# Why The Code Matters

Team Capita,

Our Code of Conduct, which we refer to as 'the Code' is there to support us on the decisions we make each and every day working for Capita.

It steers us in the right direction to delight customers and helps us work together, as one team, to exceed expectations.

It governs our values and ethics and drives our behaviours in everything we do to ensure we have trust. We must always do the right thing, with integrity, to help us succeed and grow as a company.

The Code applies to everyone who works at, or with Capita – employees, contractors, and suppliers. Please take some time to read and understand the Code and role model the behaviours with others.



We must all work together and be responsible for how we act, using our values when making decisions. The Code sets the standard for us all, how we treat people and how others should treat us, not matter what geography we work in.

There will be other policies you will follow, depending on different legislation or markets we operate in which will underpin the Code, but this is the benchmark for us all.

If you ever need to seek clarity, please go back to the Code, or if you hear or see anything that you believe may contradict our values and behaviours, please speak up. You can use the confidential and independent Speak Up service, or if you feel comfortable, please speak to your manager, a senior manager or your HR business partner.

It's important we all work together as one team and follow the Code to delight our customers.

Thank you

A handwritten signature in black ink, appearing to read 'Adolfo', written in a cursive style.

Adolfo, CEO

## About the Code

1

Our purpose, values, behaviours and the ten 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 elements of our key policies, standards and procedures so you are clear about what you must do. Please read those documents and refer to them when you must 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 us work together and hold each other to account. We will benchmark our performance 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.



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



Complete all mandatory training in the timescales set.



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 standard and procedures that support them.



Ask for help if you are unsure.



**SpeakUp** if you are not sure how to apply the Code or if something does not feel right.



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

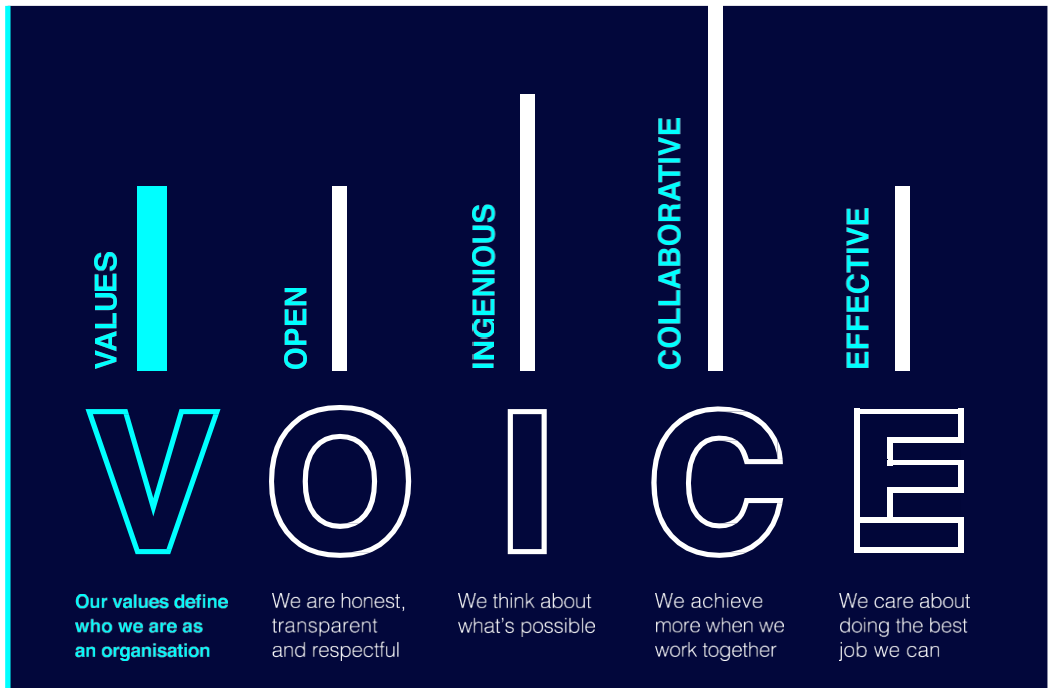
- Does it help us to create better outcomes?
- Does it adhere to our values and our behaviours?
- Does it comply with our policies and the standards and procedures which support them?
- Is it legal?
- Is it fair?
- Is it safe?
- Could this harm our reputation?
- Am I setting a good example?

## • 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 10 Managers’ Commitments that underpin how we act.

### Our VOICE Capita Values



If you are a manager, you also need to:

- Ensure you and your team has read and understood the Code.
- Hold yourself and your team to account in acting in accordance with the Code asunderpinning 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.

### Managers' commitments

As a manager of people, processes, or projects, I commit to:



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



Create an environment which champions wellbeing and where no physical, verbal or mental harm comes to anyone



Build an inclusive workplace which encourages and values diversity, enabling all colleagues to thrive



Set the direction by making sure everyone knows what goals and priorities are, and where their work fits into the overall business strategy



Focus on the outcomes my team achieve, trusting everyone to deliver while working in the most flexible way their roles will allow



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



Be accountable for the actions and outputs of my team



Take action against any form of discrimination, harassment or bullying



Inspire and develop those I work with



Recognise and celebrate good work





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 challenges 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 [SpeakUp Policy](#) sets out the channels available to you to do so.

**You should raise a concern under this policy using:**

Our confidential, independently operated, SpeakUp helpline and website.

Whispli which is a secure and anonymous two-way communication platform.



Whispli can be accessed at <https://capita.whispli.com/speakup>.

Whispli, 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.

### **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.
- 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 can be reported as a Speak Up**

- 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.
- Retaliation against those raising concerns.

### **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 reprisal as a result of raising a concern.
- We will not tolerate the harassment or victimisation of anyone raising a concern or any attempt to influence 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! We want you to raise the matter while it is still a concern.
- To use the channel set out in this policy 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, directing concerns to our Business Integrity Team.
- To promote and help foster a workplace environment that supports any person to speak up in good faith without fear of reprisal.

**If you raise a concern**

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

**Further information**

Policy Zone	Link to Policy Zone
Speak Up Policy	<a href="#">SpeakUp Policy</a> If you have a concern that the Code is not being followed or our values and behaviours are not being properly demonstrated
Employee Handbook	<a href="#">link</a> for more details on how our employee grievance procedures work.
Contacts	Claire Denton, Chief General Counsel Scott Hill, Chief People Officer

# Our People

## We Put People First - Wellbeing and Health

### Our policy overview

We are committed to creating a working environment that protects, supports, and promotes the wellbeing and health of our colleagues. Through applying the company values and commitments and by following the Group wellbeing standard and health policies, we will ensure that all our colleagues are happy and healthy.

### Our conduct

- Embrace wellbeing practices to become an intrinsic part of everything you do, taking care of yourself and your colleagues.
- Ask for help and support and encourage others to do the same should you feel it's needed.
- Actively engage with wellbeing and health promotion events and activities.
- Use our wellbeing and health resources and for general information and the employee assistance programme for more detailed support services.
- Take steps to be aware of the support provided by our occupational health partners and engage with any proactive promotions.
- Take a proactive approach to looking after your own physical and mental health and wellbeing.
- Talk to a manager, an HR business partner or use our Speak Up facility if you see or experience anything that causes harm.

### Further information

<b>Policy Zone</b>	<a href="#">Link to Policy Zone</a>
<b>Contacts</b>	Dr Charles Young, Senior Medical Officer Scott Hill, Chief People Officer

# Engagement & Inclusion

## Our policy overview

Diversity will strengthen Capita. We are committed to creating an inclusive, engaged and values-driven workplace where everyone has an equal opportunity to succeed. We value the diversity of thought that comes from building teams with different backgrounds and experiences. We expect everyone we work with to behave in a way that promotes inclusion and fairness, and to speak up if they see any evidence of discrimination. We commit to listening to our employees so that we continuously improve. We value human rights and treat people with dignity, care and respect. We will proactively work to 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

- We have zero tolerance for discrimination. Speak up if you experience or see discrimination, or if you see or hear anything that does not promote inclusion. We will deal with it.
- Educate yourself on inclusive practices, so your behaviour contributes to everyone at Capita feeling 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.
- Proactively look for opportunities to be more inclusive in how you recruit, train, mentor and develop others,
- Evaluate and compensate performance on the basis of how objectives are met, as well as what is delivered.

## Further information

<b>Policy Zone</b>	<a href="#">Link to Policy Zone</a>
<b>Contacts</b>	Scott Hill, Chief People Officer

# Anti-Racism, Discrimination, Harassment

## Our policy overview

We treat people with care and respect and work collaboratively to create a positive and respectful working environment. We take a zero-tolerance approach to all forms of abuse, racism, discrimination, harassment and bullying of all employees, contractors, customers, suppliers, and candidates within our recruitment process, or anyone else that Capita comes into contact with. 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 zero-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. We will deal with it in line with our Anti- Racism, Discrimination, Harassment and Bullying Policy and Procedure.

## Further information

<b>Policy Zone</b>	<a href="#">Link to Policy Zone</a>
<b>Contacts</b>	Your local HR Business Partner Scott Hill, Chief People Officer Claire Denton, Chief General Counsel

# 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.
- We alert a manager or HR business partner about colleagues we think might be under the influence of drugs or alcohol at work, or we use the Speak Up facility. We actively support any colleague who we think might have a drug or alcohol misuse problem.
- We encourage colleagues who may have a drug or alcohol problem to use our Employee Assistance Programme where possible.

## Further information

<b>Policy Zone</b>	<a href="#">Link to Policy Zone</a>
<b>Contacts</b>	Your local HR Business Partner Scott Hill, Chief People Officer Claire Denton, Chief General Counsel

# Health, Safety, Environment and Safeguarding

## Our policy overview

Health, Safety and Environment (HSE), at Capita is a priority, and we are all responsible for ensuring the health and safety of colleagues, contractors, and others. We must adhere to legislation and ensure our contractors and visitors follow our policies and procedures.

## Our conduct

- We provide a safe and healthy working environment. We recognise that a work/ home balance aids overall health, wellbeing, and productivity.
- All employees and managers must complete the necessary HSE training, and colleagues will have the appropriate equipment to complete tasks safely.
- All accidents and incidents must be reported to enable us to learn and lower the risk of re-occurrence.
- Colleagues must raise any health and safety concerns with their line manager, HSE representative or by using the Speak Up facility.

## Our policy overview – Safeguarding

Safeguarding at Capita provides protection for our Colleagues and for Adults at Risk and Children who come into contact with us during work related activities. To ensure we all are fully protected we must adhere to our Safeguarding framework:

- The Capita Safeguarding Standard is the centre of the Safeguarding framework and details the process, roles, responsibilities, and requirements we all need to comply with.
- All Capita employees will be required to complete safeguarding training relevant to the service their Business unit provides.
- Any Safeguarding concerns must be reported to the business unit Safeguarding Representative or Group Safeguarding team.
- **If the adult or child at risk is in immediate danger, the first Capita colleague who is made aware must contact emergency services without delay or further authorisation.**

## Further information

<b>Policy Zone</b>	<a href="#">Link to Policy Zone</a>
<b>Contacts</b>	Head of HSE for Capita Public



# 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, employment or consultancy roles including legal/shadow or defacto Director appointments 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 area trustee of.	Get approval from your line manager before donating.  Let Company Secretary know of any donations that are £5,000or above.
Any ownership in another business of over 5% should be declared.	Check with your line manager if it's acceptable and, if so, inform Company Secretary.

## 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.



## Appointments and investments outside of Capita

External appointments outside of Capita often can be development opportunities. These may need time from your current role or are in your own time. All need sign off from the business and be logged with the Group Company Secretary. Additional requirements apply where you are within a FCA regulated business or the role is in a listed company and requires LSE approval or notification.

## Further information

<b>Policy Zone</b>	<a href="#">Link to Policy Zone</a>
<b>Contacts:</b>	Claire Denton, Group General Counsel

## **Our Business**

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

### **Communities**

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**

Our aim is to encourage and work with suppliers to achieve the highest standards within our supply chain. We are committed to working with our supply base to ensure that together we can achieve wider social, economic and environmental benefits and who share our commitments to safety, integrity and human rights and the Code's principles. We seek out suppliers who have the same ethical principle 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 within our supply chain.



**Further information**

<b>Policy Zone</b>	<a href="#">Link to Policy Zone</a>
<b>Contacts</b>	Scott Hill, Chief People Officer

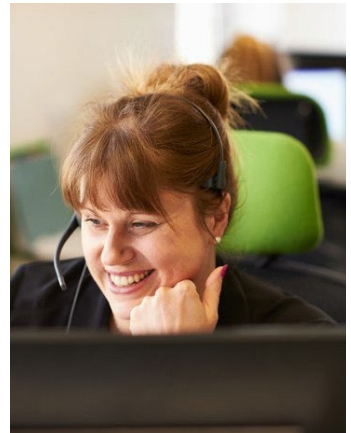
# Business Travel and Expenses

## 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

<b>Policy Zone</b>	<a href="#">Link to Policy Zone</a>
<b>Contacts</b>	Your divisional finance director

# 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 or facilitation payments in any form, or gifts or hospitality in cash. 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, 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 Standard 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

<b>Policy Zone</b>	Link to Policy Zone
<b>Contacts</b>	Group Financial Crime Team <a href="mailto:groupfinancialcrime@capita.com">groupfinancialcrime@capita.com</a>

# 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

<b>Policy Zone</b>	<a href="#">Link to Policy Zone</a>
<b>Contacts</b>	Group Financial Crime Team <a href="mailto:groupfinancialcrime@capita.com">groupfinancialcrime@capita.com</a>

# 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

<b>Policy Zone</b>	<a href="#">Link to Policy Zone</a>
<b>Contacts</b>	Claire Denton, Chief General Counsel



# 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 sanctions laws, including trade embargoes, targeted, sectoral and implicit economic sanctions, and travel bans.

## 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 sanctions standard 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 Group Legal Team, do not comment unless you are cleared to do so unless relevant regulation prevents you from doing so.

## Further information

<b>Policy Zone</b>	Link to Policy Zone
<b>Contacts</b>	Group Financial Crime Team <a href="mailto:groupfinancialcrime@capita.com">groupfinancialcrime@capita.com</a>

# 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

<b>Policy Zone</b>	<a href="#">Link to Policy Zone</a>
<b>Contacts</b>	Claire Denton, Chief General Counsel

# 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 Legal Team (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

<b>Policy Zone</b>	<a href="#">Link to Policy Zone</a>
<b>Contacts</b>	Claire Denton, Chief General Counsel

# 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

<b>Policy Zone</b>	<a href="#">Link to Policy Zone</a>
<b>Contacts</b>	Claire Denton, Chief General Counsel

# 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

<b>Policy Zone</b>	<a href="#">Link to Policy Zone</a>
<b>Contacts</b>	Mike Lansdown, Group Commercial Director

# Our Assets and Information

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

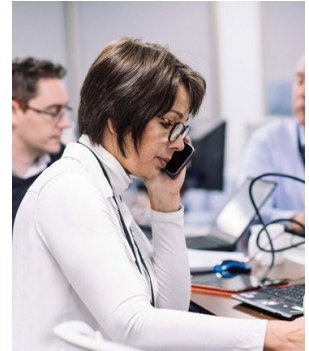
## Brand

### **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**

<b>Policy Zone</b>	<a href="#">Link to Policy Zone</a>
<b>Contacts</b>	<a href="mailto:marketing@capita.co.uk">marketing@capita.co.uk</a>

## Intellectual Property and Confidential Information

### **Our policy overview**

The unique and valuable brands and ideas that our businesses create – our Intellectual Property (IP), are protected by copyright, patents, trademarks, confidentiality restrictions 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 its written permission.
- Protect Capita’s 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 the other party’s name and IP.
- Do not release information about Capita’s finances, new products, services or contracts without approval from your line manager or communications lead.



**Further information**

<b>Policy Zone</b>	<a href="#">Link to Policy Zone</a>
<b>Contacts</b>	Mark Burnell, Group Legal Director

# Communications

## Our policy overview

We communicate openly and transparently with all our stakeholders, including our people, clients and customers and investors, politicians and the media – at the right time and in an appropriate way. We provide accurate and clear information, in order to improve understanding of and support for Capita's purpose, strategy and performance. At the same time, we uphold our obligations to keep certain information confidential, with limited access to those who need to know, alongside selective disclosure of financial and/or inside information that could impact our share price and/or reputation.



**External Communications:** We protect, maintain and aim to improve Capita's reputation by building and maintaining relationships with our key external stakeholders and providing insightful information in a timely and appropriate manner.

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

**Social media:** Sites such as Twitter, Facebook and LinkedIn, provide opportunities for us to promote Capita and its businesses, people and values both internally and externally. We encourage colleagues to take part in the social conversation, share experience and be proud of achievements and experiences, while being conscious of any potential reputational risk.



## Our conduct

- Be professional when you represent us and do not say things that could adversely affect Capita and its reputation.
- Respect your audience and never use insulting, obscene, defamatory, inflammatory or discriminatory language.
- Follow our editorial guidelines. If you are not sure, talk to your local communications lead.
- Do not make comments to external stakeholders, such as the media, industry analysts or government figures on behalf of Capita and our businesses unless you have had prior 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, and not be potentially reputationally damaging.
- Remember our obligations as a listed company are to ensure that we protect and/or disclose information lawfully and do not provoke any financial or reputational risk.
- Confidential and/or inside information should be respected as such; sit within password-protected documents if necessary; and only be communicated or forwarded on in an authorised way.



## Further information

<b>Policy Zone</b>	<a href="#">Link to Policy Zone</a>
<b>Contacts</b>	<a href="mailto:marketing@capita.co.uk">marketing@capita.co.uk</a>

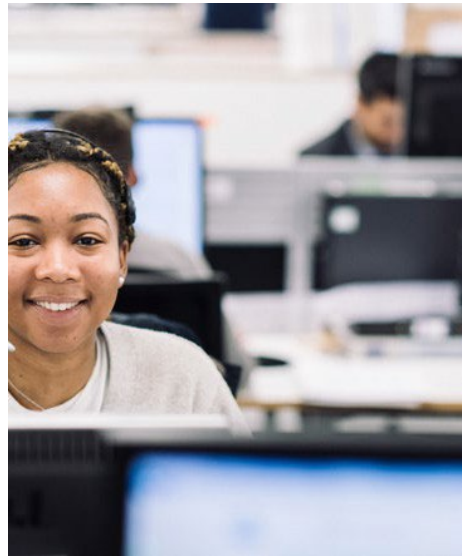
# Information Security

## Our policy overview

We expect high standards of information security, regardless of whether information is ours, our clients, or people outside of Capita. Every person who works for us has a shared responsibility to keep information safe. We are committed to maintaining the confidentiality, integrity and availability of information, protecting information assets and raising and maintaining security awareness.

## Our conduct

- Protecting information assets consistently to a high standard to prevent compromise by external and internal threats, deliberate and accidental.
- 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.
- Maintaining security awareness to help avoid the unintentional or malicious disclosure of confidential information.
- 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

<b>Policy Zone</b>	<a href="#">Link to Policy Zone</a>
<b>Contacts</b>	Clarence Odogwu, CISO

# 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 its 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 (see the [Privacy Toolkit](#) on Connections).
- 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 local Data Protection Lead or the Capita PLC Data Privacy Officer.
- Do not make any notifications to the Regulator. Only the DPO is authorised to deal with the Regulator when notifying reportable incidents.
- Complete (and keep up to date) the mandatory data privacy training at least annually.
- Get advice from the Privacy Team if you are unsure of any aspect of data privacy.

## Further information

<b>Policy Zone</b>	Link to Policy Zone
<b>Contacts</b>	Elvira English, Data Protection Officer

# Contacts

Title	Name	Email
Chief General Counsel	Claire Denton	Claire.Denton@capita.com
Chief People Officer	Scott Hill	Scott.Hill@capita.com
Chief Financial Officer	Tim Weller	Tim.Weller@capita.com
Head of Business Integrity	Philip Dixon	PhilipDixon2@capita.com
Data Privacy Officer	Elvira English	Elvira.English@capita.com
Group Commercial Director	Mike Lansdown	Mike.Lansdown@capita.com
Senior Medical Officer	Dr Charles Young	Charles.Young@capita.com
Group Head of Clinical Governance and Safeguarding	Zoe James	Zoe.James@capita.com
CISO Director	Clarence Odogwu	Clarence.Odogwu@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:

- Intellectual Property Standard
- Confidentiality Classification Matrix Standard
- Business Travel and Expense Policy
- Disclosure and Control of Inside Information Standard
- Share Dealing Procedure
- Dawn Raid Policy and Procedure
- Diversity and Inclusion Policy
- Anti-Racism, Discrimination, Harassment and Bullying Policy and Procedure
- Financial Crime Policy and Standards
- Health, Safety and Environmental Policy and Standard
- Wellbeing Policy and Standard
- Safeguarding Policy and Standard
- Human Rights Policy
- Information and Cyber Security Policy and Standards
- Privacy Policy and Standards/Procedures
- Procurement Policy< Standard and Supplier Charter
- Social Media Policy and Standard
- Speak Up Policy and Standard