



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 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.
- 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.

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.

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.

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.

Chief General Counsel

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