Capita

Business Resilience Policy

Resilience is defined as the ‘ability to withstand shock and recover’. To this end, Capita’s businesses must ensure they are resilient and able to continue to deliver critical services during adverse events.

Resilience also focuses on maintaining the controls and processes necessary to prevent or detect potential incidents before they occur, thereby seeking to reduce operational disruption to Capita’s business, staff and clients.

This Policy sets out the Business Resilience approach that must be adopted by our divisional and functional management teams.

We are committed to

- Putting the safety of any person working for or with us as our priority.
- Maintaining policies, controls, standards and procedures that identify vulnerabilities that impede our ability to be resilient.
- Promoting and fostering a leadership culture that supports effective resilience management and that addresses threats to meeting acceptable service delivery levels.
- Understanding the regulatory changes and business challenges affecting our organisation

In line with our

- Code of Conduct
- Related policies and standards e.g. Information Security, IT Disaster Recovery and Group Procurement
- Enterprise Risk management framework
- Business Continuity standard
- Major Incident & Crisis Management standard

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What you should expect from us

- We monitor controls (preventative, detective and corrective) across the group to identify business resilience deficiencies. In addition, we maintain various standards which:
  - Provide Group wide standards to ensure Capita responds, manages and resolves matters in a consistent way including incident & crisis management and business continuity.
  - Support our risk appetite and impact tolerances for business resilience.
  - Leverage functional policies and standards to identify vulnerabilities, risks and weaknesses and report accordingly.
  - Provides guidance, advice, training, awareness and tools to support, create and maintain effective solutions in line with our standard arrangements.
  - Aims to minimise and mitigate reputational, legal, regulatory, people and financial impacts on both Capita and its clients.
- We will monitor and escalate any non-compliance with this policy as necessary - which may be to our audit and risk committees and ultimately to the board

What we expect from our divisional (typically MDs) and 1st Line of Defence functional management

- You take ownership for the Incident, Crisis and Business Continuity Management arrangements for the divisional or functional area for which you are responsible.
- You encourage the identification of vulnerabilities in your business or function that may impair your ability to be resilient. This may include scenario planning to better understand the impacts of these vulnerabilities e.g. loss of a critical supplier
- You promote and ensure that our business resilience related standards are applied, which include:
- Ensuring your business or function has an Incident and Major Incident response capability in line with the group standard.
- Ensuring appropriate exercising and testing is completed to validate that resilience requirements have been met. Where these have not been met this presents a vulnerability and risk to the business or function's resilience and is reported accordingly.
- Ensure that bids, acquisitions and disposals have appropriate business resilience measures and they have been validated and verified to ensure they can be achieved e.g. Recovery Time Objectives (RTO)
- Ensure that suppliers who provide services to Capita are resilient and meet Capita contractual and regulatory requirements.
- By understanding your business in terms of property, people, technology and suppliers this will provide a full oversight of Capita's resilience needs and dependencies (and by default potential vulnerabilities).
- Regulated businesses must ensure they fully align to regulatory requirements pertaining to Business Resilience.

How we will achieve this

- We require all our divisions, businesses and functions to follow the applicable policies, standards and frameworks and oversee the effective management of risks that impact our ability to operate a resilient business.
- We review policy compliance through group-wide risk-based monitoring and periodic auditing activity and report on policy compliance and related risks through risk governance which ultimately includes the reporting of significant matters to our plc risk committees and board.

Tim Weller
Chief Financial Officer
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