



Speak Up Policy

We are committed to high standards of behaviour towards our people, customers, governments and the communities in which we operate. Openness is a core Value.

This policy sets out our commitment to speaking up about concerns you have at work, also known as ‘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 misconduct 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 local jurisdictional guidance

Capita are committed to

- Encouraging an open and transparent culture across our businesses that allows any person to Speak Up if they see or reasonably believe misconduct is occurring or is likely to occur.
- Supporting individuals to raise concerns in good faith without fear of reprisal, even if the allegation is unproven.
- 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.

What can be reported to Speak Up

- Criminal offences, failure to comply with a legal obligation or miscarriage of justice.

- Breaches of our Code of Conduct, their related policies, standards, procedures and guidance, including any applicable industry or professional code.
- Improper conduct or unethical behaviour or behaviours not in accordance with our Values.
- Dangers to health and safety or the environment.
- Retaliation against anyone who has raised a concern.
- The deliberate concealment of any of the above.

What you should expect from us

- We will protect any person who raises a concern from 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 concern. Such behaviour violates our code of conduct and, if confirmed, may lead to disciplinary action, including possible 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.

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. We want you to raise the matter while it is still a concern.
- To use the reporting channel set out in this policy.
- Not undertake investigations on your own, unless authorised by the Business Integrity Team.

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.
- 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
June 2025**

Speak up Channels

Our confidential, independently operated, SpeakUp helpline and website are available to report concerns. The website can be accessed <https://capita.whispli.com/speakup> (or use the QR Code to access the site)



Our SpeakUp helpline telephone numbers, available 24 / 7 are:

Country	Telephone Number
Bulgaria	+35 924 930 324
Germany	+49 30 83 796 862
Ireland	+35 312 338 780
Poland	+48 729 086 954
South Africa	+ 27 861 995 037
Switzerland	+41 43 505 28 41
United Kingdom	+ 44156 433 4769