

Scope	It applies to all Capita businesses (both UK and overseas) and their employees. It also applies to outsourcing within Capita as well as to external third parties (including partnerships and joint ventures).
Your responsibility	The prevention, detection and reporting of bribery or corruption is the responsibility of all employees.
What is bribery and corruption?	<ul style="list-style-type: none"> • Offering, promising or giving a bribe, which includes facilitation payments and “kickbacks” (active bribery) • Requesting, agreeing to receive or accepting a bribe (passive bribery) • Acting as an intermediary (i.e. facilitating an act of bribery); and • Bribing public officials.
Policy statement	Capita does not tolerate bribery and corruption.
Facilitation payments	These payments are illegal under the Bribery Act. The safety of Capita employees is of primary concern and when travelling abroad, an employee should never refuse to make a payment if faced with a threat, or fear of violence or loss of liberty.
Political donations	Capita is an apolitical organisation and donations (financial or in kind) to political parties or individuals are not permitted.
Gifts and hospitality	Gifts and hospitality may be offered or accepted only in accordance with the Gifts and Hospitality policy and recorded on the appropriate registers. Pre-approval must be obtained for all events in Europe which are equal to or over £500 (or £150 if involving a public official).
Risk based approach	All business units and group functions must complete a risk assessment on a periodic basis
Sponsorships and charitable donations	All sponsorships and charitable donations must be approved in line with the normal purchasing procedures and due diligence must be carried out on recipient bodies to ensure that no undue business advantage is gained in this way.
Training	All employees must complete the Financial Crime training within one month of joining Capita, and annually thereafter. Employees that are perceived to be potentially exposed to a higher risk of bribery and corruption must also complete the advanced anti-bribery and corruption training within the Financial Crime module.
Examples of “adequate procedures”	<ul style="list-style-type: none"> • The tone from the top • Due diligence on third parties • Policies and procedures • Completing the risk assessment • Monitoring, review and evaluation of bribery prevention controls.
Breaching the Bribery Act and the policy	All potential or actual bribery and corruption issues must be reported through the Incident Reporting Process or Speak Up. Serious implications on Capita, including adverse regulatory and media comment or criminal and civil penalties, may result. Non-compliance with this policy may result in disciplinary and / or criminal proceedings against the employee.
Third parties	<p>Third parties, such as suppliers, agents, or anyone engaged by them to act for or on behalf of Capita must not:</p> <ul style="list-style-type: none"> • Offer, give, request, agree to receive or accept a bribe • Do anything to circumvent controls in place to deter, prevent or detect bribery <p>All appointments of third parties require prior approval of senior management, who will review the business case for their appointment and conduct proportionate due diligence. Capita has a right of termination of a contractual relationship in the event of third parties paying bribes or acting in a manner inconsistent with this policy.</p>
Record keeping	All records relating to compliance with this policy must be retained in line with the Data Retention Policy and schedules .

Classification	PUBLIC
Date of Issue	Sept 2017
Date of Next Review	Sept 2018