

## Financial Crime Policy

As a responsible business we have an important role in society to deter, detect and report financial crime. This policy explains how we protect our business, our people, our clients and their customers from being victims of financial crime and what you should expect from us.

### We are committed to

- Taking all proportionate steps to deter, detect, report and investigate any form of financial crime, including:
  - Fraud against us, or our clients or their end customers.
  - The use of any of our businesses to launder the proceeds of crime or to finance terrorism or to facilitate tax evasion.
  - The use of “inside information” for personal or business gain or the illegal manipulation of the financial markets we operate in.
- Operating in accordance with all applicable laws, regulations and sanctions restrictions imposed by the UK HM Treasury, The European Union, the United Nations or other authorities.
- Operating in accordance with all applicable laws.

### In line with our

- Code of Conduct.
- Capita Standards, which set out baseline requirements that must be followed by our businesses and any person who works for us, in the areas of:
  - Anti-money laundering and countering terrorist financing.

- Fraud.
- Sanctions.
- Prevention of Tax Evasion.
- Disclosure & control of inside information.
- Share dealing rules.

### What you should expect from us

- We operate our business in a way that deters, detects, investigates and reports financial crime. This includes:
  - Undertaking checks of our business relationships and those who work with us.
  - Making sure inside information about our company is protected and managed in a way to make sure it is controlled and limited to those who need to know it.
  - Investigating and acting against any individual or group perpetrating financial crime against us, our people, our clients and their customers.
- We work collaboratively with law enforcement authorities in relation to any related investigations and prosecutions.
- We reserve the right to search all company property and to review all data stored on our systems if there are reasonable suspicions of financial crime activity.

### What we expect from you

- Demonstrate the commitments of this policy and the requirements of the standards and procedures which support it.
- Complete all financial crime training that applies to you.
- To immediately report any suspicion of financial crime being committed. By following the requirements of our standards which support this policy or local suspicious activity reporting procedures where these are in place.
- To not inform or “tip-off” anyone if:
  - You have a suspicion that they may be committing a financial crime.
  - Suspicious transactions or activity has been reported.
  - You are aware a law enforcement instigation is intended or underway.
- To not deal in any Capita securities (for example, Capita plc shares) at any time if you have unpublished insider information or price sensitive information in relation to Capita plc’s activities.

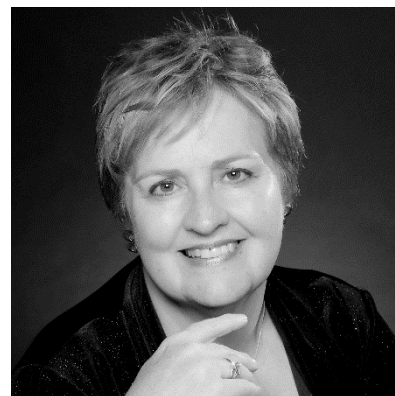
- To speak up if you face a situation where you are not sure what to do or have a concern in relation to this policy.
- Our **Speak Up Policy** sets out the channels available to you and no action will be taken against you if you report a genuine concern. Whether any concerns are proven or not.

#### What we expect from our managers

- To ensure this policy is promoted and applied in the divisional or functional area you are responsible for.

#### How we achieve this

- Every division and function in Capita must adhere to this policy and associated standards, procedures and guidance as relevant to their business activities.
- Our management teams are supported by our Financial Crime and Company Secretary teams who provide expert counsel and challenge to support decision making and the investigation of concerns raised in relation to this policy.
- We take policy non-compliance very seriously. Exceptions are reported and managed through our governance mechanisms, which ultimately includes to our Risk and Audit Committees.



Sue Williams  
Chief risk & compliance officer  
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