



## Legal Policy

The Legal function provides support for Capita's broad range of legal issues and concerns. We work with all businesses and corporate functions of Capita to minimise Capita's exposure to legal risks. We also provide day-to-day legal support to all of Capita's businesses and corporate functions and seek to protect Capita's interests.

Capita takes its obligations to comply with applicable laws, rules and regulations extremely seriously, including ensuring it acts within the spirit of the law. Demonstrating legal compliance is a core part of how Capita does business, and this is critical to maintaining the trust of customers and protecting the interests of stakeholders.

### We are committed to

- Acting in accordance with all applicable laws and regulations in the jurisdictions in which Capita operates.
- Risk management and governance, which is an essential part of Capita's ethos and how Capita manages risk as a public company.
- Meeting Capita's regulatory commitments and obligations as required by its listing on the London Stock Exchange.

### In line with our

- Code of Conduct.

- Capita Standards and Procedures, which set out requirements which must be followed by Capita's businesses and any person who works for Capita. We currently have (or are in the process of producing) the following Standards and Procedures:
  - Competition Law Standard
  - Intellectual Property Standard / Procedure
  - Litigation Hold Standard and Procedure
  - Dawn Raids – Standard and Procedures
  - Privilege Guidance – Procedure

- Confidentiality Standard
- External Legal Panel – Appointment and Use Standard

### What you should expect from us

- Providing advice to assist Capita businesses in complying with all applicable laws and regulations of the countries within which they operate.
- Providing advice to Capita businesses in a way that helps them avoid breaches of legal and regulatory requirements.
- Advising on appropriate governance arrangements.
- Providing support and training to help deliver our commitments to all Capita colleagues.

### What we expect from you

- Demonstrating the commitments of this Policy and the requirements of the Standards and Procedures which support it.
- Understanding and complying with Capita-wide governance processes.
- Retaining material documents and correctly reporting business activities to ensure that Capita complies with relevant laws and regulations and that all commercial, business and legal transactions are properly recorded.
- Immediately reporting any suspicion of legal or regulatory non-compliance to your line manager and speaking up if you face a situation where you are not sure what to do or have a concern in relation to this Policy.
- The **Speak Up Policy** sets out the channels available to you.

### What we expect from our managers and third parties

- Ensuring this Policy is promoted and applied in the business, division or functional area you are responsible for.
- We also expect our suppliers, agents and other third parties to provide services in compliance with the relevant principles of this Policy and our supporting legal Standards and Procedures.

### How we will achieve this

- Every business, division and function in Capita must adhere to this Policy and associated Standards and Procedures. Should there be any concerns or questions please refer to the Legal function.



**Claire Denton**  
Chief General Counsel  
June 2023

