

# CAPCO'S SUPPLIER CODE OF CONDUCT

Capco's Supplier Code of Conduct outlines our minimum expectations of our third-party suppliers in relation to key environmental, social and governance considerations. Like Capco, we expect our suppliers to comply with relevant legislation in these areas and to adopt progressive policies in relation to clients, staff, suppliers, and the broader community they serve. All suppliers are expected to comply with this Code, whether they are supplying goods or services directly to Capco, or our clients. Suppliers are also expected to ensure comparable standards are applied to any sub-contractors or other third parties they may use to deliver goods or services to Capco.

## ETHICS

Capco is committed to doing business with organisations that share our commitment to treat all stakeholders fairly and ethically ensuring compliance with all applicable laws and regulations in all that they do. In particular, suppliers are expected to:

- Comply with all applicable laws and regulations in place, including those related to Anti-Bribery and Corruption (such as the UK Bribery Act and other similar legislative requirements) when performing any form of service on our behalf and wherever they do business.
- Ensure appropriate policies, procedures and controls are in place to prevent bribery and corruption, money laundering, and any other financial crime activities. Capco has a zero tolerance for any instances of bribery or corruption when acting for or on behalf of Capco.
- Refrain from actions such as offering, giving or receiving fees, gifts, or advantages of any kind that are or could be considered acts of bribery or corruption.
- Avoid any conflicts of interest and never participate in any activities which could reasonably be interpreted as an attempt to improperly influence business decisions.
- Have reasonable and lawful payment terms with their own suppliers and subcontractors.

## PEOPLE AND HUMAN RIGHTS

Capco suppliers are expected to respect and uphold human rights in the country or countries in which they operate. We expect our suppliers to operate in accordance with the United Nations Universal Declaration of Human Rights, the Fundamental Conventions of the International Labour Organization (ILO) and the United Nations Guiding Principles on Business and Human Rights. This means that Capco suppliers are expected to:

- Prohibit forced labour, ill-treatment of employees, and human trafficking, ensuring that third-party employees and contractors have a right to work in the applicable jurisdiction and country.
- Comply fully with anti-slavery legislation and regulations (such as the UK Modern Slavery Act and all other similar applicable laws relating to modern slavery and fair employment).
- Allocate a legal minimum wage sufficient to meet the basic needs of their employees and in compliance with current legal requirements.
- Ensure working hours are appropriate and in line with industry standards and managed and reported, in accordance with local regulation and industry best practice.
- Respect employees' freedom of association.
- Abide by all applicable laws and regulations to provide a safe and healthy working environment.

# DIVERSITY AND INCLUSION

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Our company's commitment to diversity and inclusion, respect, and integrity is the foundation on which our business and our professional lives are built. We believe that having and sharing diverse perspectives is the glue that binds us together. Diversity and inclusion power the innovation and creativity that enables us to deliver world-class solutions to our clients. Capco suppliers are expected to ensure that all staff in their organisation feels included and valued, regardless of their background. In particular, suppliers are expected to:

- Comply fully with any applicable legislation and regulation on diversity and inclusion, equal opportunities, or unfair discrimination (such as the Equality Act 2010 in the UK and all other similar and applicable laws relating to discrimination).
- Have a policy in place which explicitly promotes diversity and inclusion and prohibits unfair and unlawful discrimination, bullying, and harassment based on sexual orientation, race, ethnicity, gender, age, religion, marital/civil partnership status or disability.
- Ensure staff understand the importance of diversity and inclusion to the organization, for example, through diversity and inclusion training to the workforce.
- Have measures in place to monitor and improve diversity appropriate to the size of the organisation, such as formal diversity targets related to workforce composition and leadership.

# PHYSICAL, CYBER AND INFORMATION SECURITY

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Capco's policy is to ensure that our confidential data, including that of our customers and colleagues, is relevant, secure and appropriately managed. We expect our third-party suppliers to have in place their own policies and control frameworks to ensure:

- The ongoing protection of our information through appropriate cyber and information security controls.
- Where Capco data is processed, transmitted, stored or accessed by our third-party suppliers, we expect that this is managed and controlled in line with the applicable data protection laws, regulations and record retention standards provided by us, and additionally to ensure that data subjects' rights are not infringed.
- Where any breaches are identified, we expect these to be brought to our attention immediately.
- They do not jeopardise Capco's physical security and assist us in providing a safe working environment for all our staff, customers, and visitors.

# OPERATIONAL RESILIENCE

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Our policy is to manage and control operational resilience, specifically focusing on crisis management, business continuity and IT disaster recovery in order to minimise or mitigate risks to the continuity of services provided. Third-party suppliers are expected to maintain management and control frameworks to ensure operational resiliency practices are both adequate and appropriate for the areas in which they operate.

# ENVIRONMENT SUSTAINABILITY

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Capco suppliers are expected to adopt progressive policies related to sustainable business, environmental responsibility and the climate emergency demonstrate an appreciation of the environmental risks, impacts and responsibilities associated with the goods and services they provide. In particular, suppliers are expected to:

- Abide by all legislation and regulation relating to the protection of the environment.
- Have a policy in place, appropriate to the size and nature of their operations, which deals with preventing, mitigating, and controlling their environmental impacts.
- Take reasonable steps and have processes in place to improve resource efficiency, reduce resource consumption, and develop environmentally friendly practices.
- Monitor review and report on environmental performance on a regular basis.

## MONITORING

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Capco may conduct compliance surveys with our suppliers to confirm compliance with this Supplier Code of Conduct on an annual or as needed basis.

Capco expects that all suppliers will familiarise themselves with this Code and ensure they are compliant with it as part of continuing to do business with Capco.

Capco also reserves the right to periodically review and update this Code as may be required from time to time.

## VIOLATIONS AND REPORTING CONCERNS

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Suppliers violating the Supplier Code of Conduct will be reviewed by the Capco Procurement and Enterprise Risk teams. If the supplier cannot rectify and address any infringement of standards within a reasonable time period, or the violation is not rectifiable, then it may result in Capco terminating the relationship with a supplier.

Our expectation is that our suppliers feel able to raise concerns about things that are wrong, without fear of victimisation. To report a violation, you should raise your concern with your primary Capco contact. If that is not possible or appropriate, you should report the issue via our Speak Up hotline or website. The Speak Up helpline is available 24 hours a day, seven days a week to all employees, clients or vendors globally. Capco has engaged Lighthouse Services, Inc. based in the USA to manage the hotline.

European countries impose limitations on the types of Issues that may be reported through an Ethics hotline or website. If you are reporting from one of those jurisdictions, you will notice that not all Issue types are available to you.

You can access the hotline via phone or web:

**By phone:**

North America: USA and Canada: 833-350-0090

**All other countries:** 800-603-2869. You must dial your country access code first. Please [click here](#) for access codes and dialing instructions

**By website:**

[www.lighthouse-services.com/capco](http://www.lighthouse-services.com/capco)