

Declaration of Principles on respect for human rights

The Capita Customer Services (Germany) GmbH, Capita West GmbH and Capita Energie Service GmbH appoint in accordance with § 4 para. 3 in conjunction with § 3 para. § Section 3 (2) of the Act on Corporate Due Diligence in the Supply Chain (LkSG) as Human Rights Officers: Mr Nikolai Wolkow, Mr Florian Ballier, Mr Bernd Moll.

For us, sustainability means harmonising entrepreneurial success with ecological and social responsibility. We achieve this goal through innovative and digital processes, transparency, commitment and a high degree of flexibility. We are aware of our responsibility to respect human rights, promote social justice and protect the environment throughout our supply chain and are expressly committed to the United Nations Guiding Principles on Business and Human Rights (UNGP) adopted in 2011. We have fully implemented the Supply Chain Duty of Care Act in our business division and have also committed our suppliers accordingly.

The human rights strategy set out in this policy statement has been implemented in all relevant business processes of our company and subsidiaries. The Code of Conduct of our company and the majority-controlled subsidiaries has also been adapted to our human rights strategy. The same applies to guidelines and work instructions in the relevant areas. A guideline has also been drawn up for the selection of suppliers, the drafting of contracts with suppliers and the monitoring of suppliers' due diligence obligations.

The management of the company is responsible for the implementation of and compliance with the "Declaration of Principles on Respect for Human Rights". Appropriate and effective risk management has been introduced and the following measures implemented to protect human rights and the environment:

1. Human Rights Officer

The Human Rights Officer have been appointed on 07.12.2023 appointed. The duties of the Human Rights Officer include monitoring risk management in accordance with the LkSG.

2. Complaints procedure

We have set up a complaints management system that can be contacted by all business partners, suppliers from the entire supply chain and other external persons. Complaints can be reported using the following form: <https://capita.whispli.com/speakup> , email: human.rights@capita-europe.com or by telephone on [+49 30 83796862](tel:+493083796862). The telephone number can be reached during normal office hours. In this way, for example, violations of human rights, occupational health and safety regulations, prohibition of trade union activity, unequal treatment, withholding of an appropriate wage, causing environmental damage, potentially illegal activities, unethical practices and other violations of the Supply Chain Due Diligence Act can be reported without barriers.

These e-mails are processed by our Human Rights Officer, who forwards them to the management in anonymised form after checking them.

If we receive substantiated complaints concerning a supplier in our supply chain, the supplier concerned agrees to work with us to develop an action plan with binding deadlines that must lead to the resolution of the substantiated complaint.

3. Risk analysis process

The risk analysis is prepared once a year and the results are presented to the management in the "Report on risk management in accordance with the German Supply Chain Risk Management Act". Independently of this, detailed reports are prepared ad hoc in the event of incidents or corresponding reports from the complaints procedure and submitted to the management without delay.

The identified risks are prioritised and either eliminated or minimised through suitable preventive measures that encompass the entire company and our direct suppliers. If there are immediate risks to people and the environment in the direct supply chain, these are immediately eliminated by means of suitable measures. In the event of serious and immediate risks to people and the environment, we work with the supplier concerned to draw up an action plan and schedule to reduce and eliminate the violation and monitor its implementation.

We have prioritised the following risks.

1. Our goal is to eliminate violations of human rights-related due diligence obligations, such as inadequate work organisation and poor occupational health and safety, in our own business area and in our supply chain by 2023. Corresponding measures have already been initiated.
2. By 31 June 2024, we will have required all our suppliers to comply with human rights and environmental due diligence obligations
3. We will have carried out an on-site audit of at least 50% of suppliers classified as suppliers with a high risk of human rights violations by the end of 2025.
4. With the introduction of the "kodiak hub" platform, suppliers are required to provide regular instruction in occupational safety. In the event of deviations, an action plan and schedule for implementation are defined.
5. We expect all our suppliers to comply with the Stockholm Convention of 23 May 2001 on persistent pollutants. Appropriate checks are carried out where necessary.
6. All our suppliers are contractually obliged to fulfil their environmental due diligence obligations

4. Preventive measures for direct suppliers

The preventive measures relate to direct suppliers with whom a supply relationship already exists, as well as those who are still in the selection process.

All suppliers are recorded via the "kodiak hub" platform and subjected to a risk assessment. There, specific questions are asked to determine the risk potential of the respective supplier. If major risks are identified at a supplier, on-site audits can be carried out or other measures can be taken. In the event of violations that cannot be remedied promptly, a plan of action and schedule for ending or minimising the violation is drawn up together with the supplier.

If the supplier does not implement the action plans drawn up or if the defined target is not achieved, we reserve the right to terminate the business relationship with this supplier as a last resort.

5. Code of Conduct / Supplier Code

We have described our expectations of our employees and suppliers in our Code of Conduct/Supplier Code. The contents of our Code of Conduct/Supplier Code are trained within the company. Every direct supplier receives our Code of Conduct/Supplier Code of Conduct during onboarding via "kodiak hub", with the request to confirm compliance with the values stated therein.

6. Report on the implementation of due diligence obligations

The "Report on the implementation of due diligence obligations" is prepared once a year. This report sets out the risks identified, the measures introduced, the effectiveness of the measures and an evaluation of the measures. This report is published on our company's website for at least 7 years and sent to the Federal Office of Economics and Export Control (BAFA) by 31 April of the following year. The effectiveness of all the measures described is reviewed once a year and on an ad hoc basis and is subject to the continuous improvement process.