



SpeakUp
Code of Conduct



Speaking about Speaking Up

A guide to Speak Up at Serco



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An introduction to Speak Up



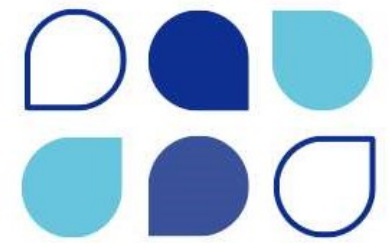
An introduction to Speak Up

We want Serco to be a place where we are all proud to work. That means always working to our Values, mycode and the law. But you may one day see something that you think breaks the law or mycode. If you do you must Speak Up.

By telling us when something is wrong you can help us make it right. If you do not say anything, the situation may get worse and increase the impact it could have on you, your colleagues and Serco. So, it is important you say something. We will take it seriously. Each year over 700 Speak Up concerns are investigated with around half finding something wrong which we put right.

Each concern is treated confidentially so you can be confident you will be listened to. We never allow anyone to act against someone who uses Speak Up.

This guide explains what Speak Up is for, how to Speak Up and what happens when you do. Speak Up is not an emergency service, if you are worried about an immediate threat please speak to your emergency services.



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When to use Speak Up



When to use Speak Up

mycode sets out the standards we expect from everyone who works for Serco. It covers many areas about our people, business and our information. Across any of these if you have a concern, feel challenged, or see something that could be done better or isn't right, then talk to someone.

You should first talk to your supervisor or manager. But we understand there are situations where you may not feel comfortable doing this. If this is the case, we are ready to help you and have different teams available depending on your concern.

To help you find the right person to talk to, go to my.serco.com/concern. On the 'Raise a concern' page you can select your type of concern and find details on who to contact.

Or you can use Speak Up.

Speak Up is our process for registering and resolving serious concerns that break the law or mycode. It should be used where you believe there has been:

- Improper conduct such as:
 - Bullying, harassment or violence at work.
 - Drug or alcohol abuse.
 - Conflicts of interest.
 - Misuse of social media.
 - Dangerous health and safety concerns.
 - Misreporting.
 - Misuse or disclosure of confidential information or personal data.
 - Improper use of company assets.
 - Information/IT Security breaches.
- Illegal behaviour such as:
 - Fraud or financial malpractice.
 - Giving or receiving bribes.
 - Competition or anti-trust violations.
- Abuse of human rights including modern slavery.
- Actions which would badly affect the Company's reputation.

When you shouldn't use Speak Up

Speak Up should not be used for every concern.

Speak Up is not for reporting:

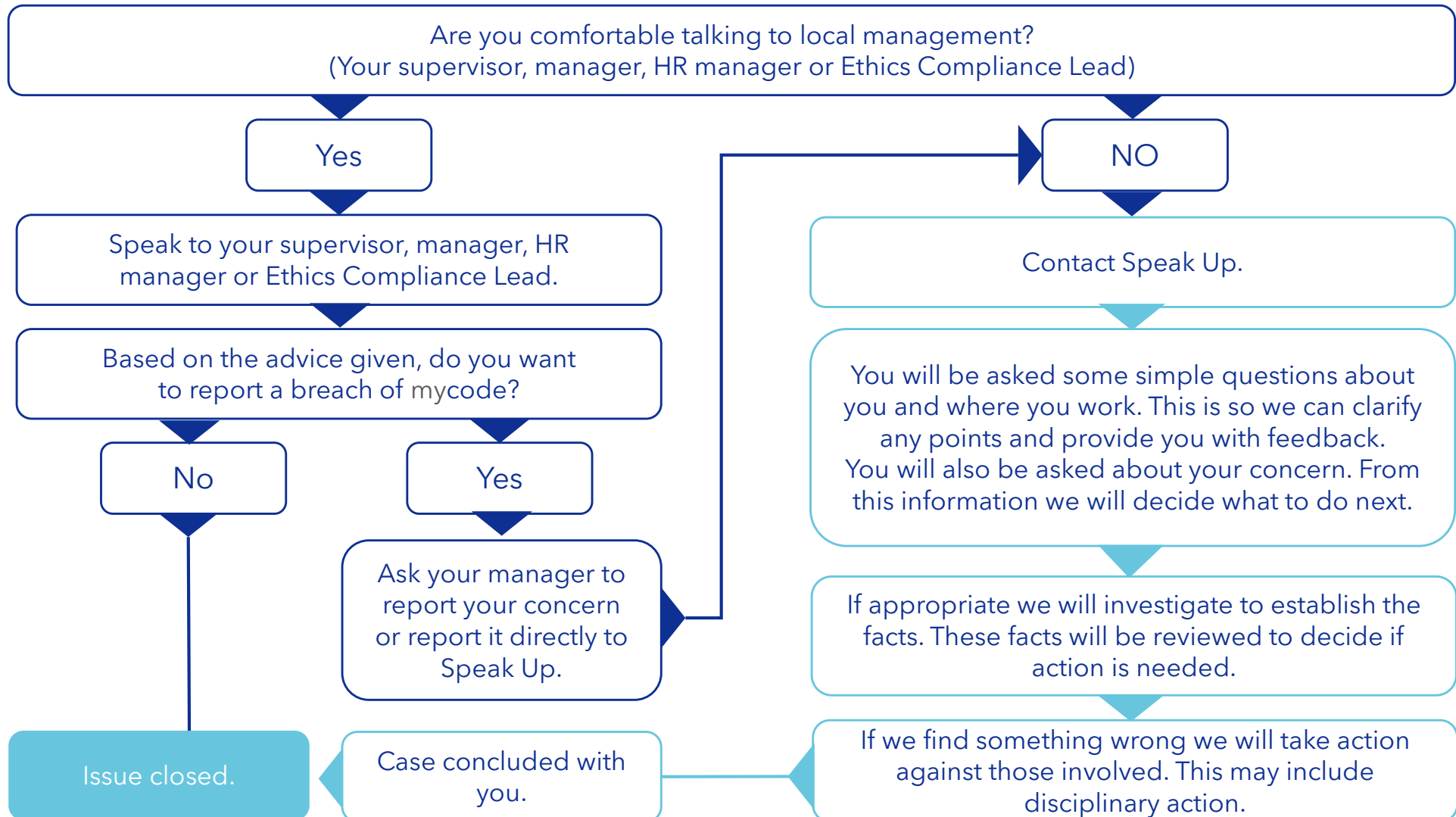
- Any grievance or employment issues you may have in relation to your employment or work conditions. These should be raised directly with your line manager or HR.
- Personal disputes.
- Events presenting an immediate threat to life or property which should be reported directly to the relevant authorities or law enforcement agencies as well as your manager.
- False accusations – doing this may lead to disciplinary measures.



How do I Speak Up?

How do I Speak Up?

There are several paths you can follow to raise your concern



Talk to management

- In the first instance speak to your supervisor or manager.
- If you feel uncomfortable discussing your concern with them or it is inappropriate, then you can discuss it with a member of:
 - The Human Resources team.
 - The Ethics Compliance team.
 - The Legal team.

If you're not comfortable doing that, then you can contact the company in confidence through one of the following channels.

Speak Up Hotline

The Speak Up Hotline is provided by an independent third-party offering:

- toll-free phone numbers with language translations in the countries where we operate (the numbers are provided at the end of this guide); or
- a web portal and online form serco-speakup.com

Both allow you to raise your concerns confidentially and operate 24/7, 365 days a year.

After you complete your report (by telephone or online), you will be given a unique code, which you should keep. You can use it to call back or access the web portal to see if there is any feedback or questions from the person handling your case. It also allows you to provide additional information. Your unique code is particularly important if you choose to remain anonymous because the person handling your case will only be able to contact you through the Speak Up Hotline.

email

You can email a report, or problems with the hotline numbers, to Serco's dedicated internal Speak Up email: speakup@serco.com (for Serco Americas use speakup@serco-na.com)

Write

Or you can write to:

- 1) Company Secretary, Serco Group plc, Serco House, 16 Bartley Wood Business Park, Bartley Way, Hook, Hampshire RG27 9UY; or
- 2) For Serco Americas: 12930 Worldgate Drive, Suite 600, Herndon, VA 20170

Whilst you have a duty of confidentiality, which means that you cannot normally disclose information outside the company without consent, you may seek external legal counsel advice about your concern. Any costs for seeking this advice will be at your cost and will not be reimbursed by Serco.

Reporting anything externally may have serious implications for Serco, the people involved and possibly also for yourself. But you can report your concern externally to a competent authority where Serco's internal channels are compromised, or they could not be expected to work properly in the circumstances. In certain extreme cases where you have reported internally and there has been no timely action, the matter is an emergency, or in the public interest, then you can contact the media.

What if I'm worried about sharing a concern?

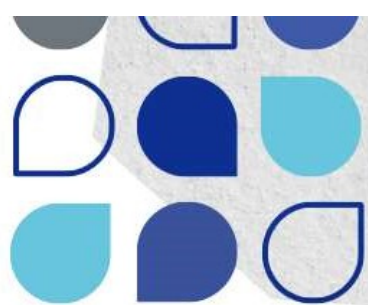
It is important that you Speak Up because we can only deal with concerns if we know about them. If you are apprehensive and want to ask any questions about Speak Up before speaking to us about your concern, then you can do this through the website (www.serco-speakup.com) or by phone. And remember, you can do this anonymously if you want. We absolutely prohibit actions against anyone who reports a concern or helps an investigation, and we will protect you and respect you for having the courage to live [mycode](#).

What kind of information do I need to provide?

When you decide to raise a concern, it is important that you provide as much detail as possible:

- **WHO:** the subject of your concern, the victim(s) and witness(es) along with anyone else involved.
- **WHAT:** a description of your concern in as much detail as possible.
- **WHERE:** the place where the concern has taken or is taking place: contract location, city, country, division.
- **WHEN:** the timeframe or dates of when the concern happened.
- **HOW:** Any documents, data, evidence, or information that may support your report. It is important that you do not break the law, company policy, or [mycode](#) in order to obtain any material.

While we do not expect you to have all the answers and you are encouraged to Speak Up as soon as possible, we can only investigate your concern if we have enough information.



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Safeguarding my position



Safeguarding my position

Confidentiality

All the information relating to the concern you raise will be handled confidentially. This means that it will only be shared on a strict need-to-know basis with a limited number of people involved in handling the case.

Information will only be disclosed outside of Serco if Serco is required to do so by law, it is in the public interest, or required under contractual obligations with a Customer. You can also help keep the case confidential by not discussing it with other colleagues or anyone else (including outside of Serco such as relatives and friends).

Your identity will be kept confidential so long as it does not compromise, hinder or otherwise frustrate any investigation. Where necessary or required by law, your identity or information may be disclosed to the appropriate government body or the police or someone else with your prior consent.

Anonymity

You may report concerns anonymously if you wish. However, if you are willing to provide your identity it will help the person handling your case to obtain more information from you if we need it and we will be able to report directly back to you when the investigation is over.

Non-retaliation

Serco will protect you from adverse employment action unless it is proved that you raised a concern in bad faith that you know is false. Acting against any person using Speak Up will be regarded as a serious disciplinary offence.

We regularly check that reporters, like yourself, have not had action taken against them because they spoke up. Where someone alleges that someone has taken action against them, we investigate it and if found to be the case, we will take disciplinary action as appropriate.

Privacy

Serco will handle personal data in line with privacy legislation and our information and data privacy and data retention policies. You can be assured that personal data will be kept securely and not be kept for longer than necessary.

Any personal data we get through Speak Up will only be used for investigating concerns raised or to comply with the law or public interest.

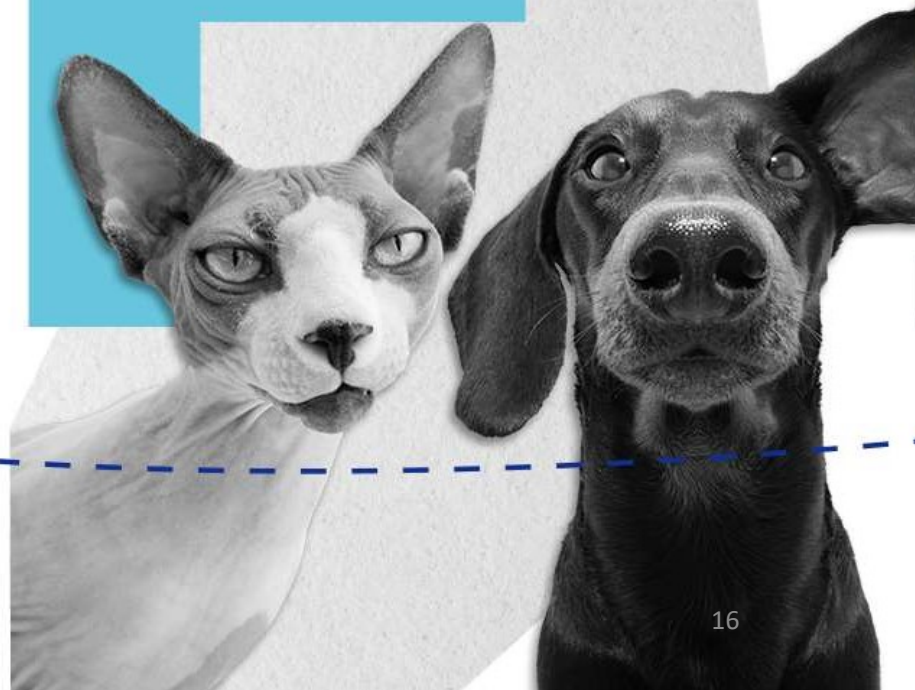
Misuse of policy

You must not knowingly make false accusations, make false representations to case-handlers or investigators during interviews, interfere with an investigation or refuse to cooperate during an investigation. If you do, this may lead to disciplinary action.



Speak Up investigation stages

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Speak Up investigation stages

What happens with my Speak Up case?

Once you have submitted your concern your case will be reviewed. If we have enough information, we will decide how the case will be handled. In over 95% of cases an investigation is undertaken. For the small number that are not investigated this is because we do not have enough information and have no means of getting more.

Who will investigate my case?

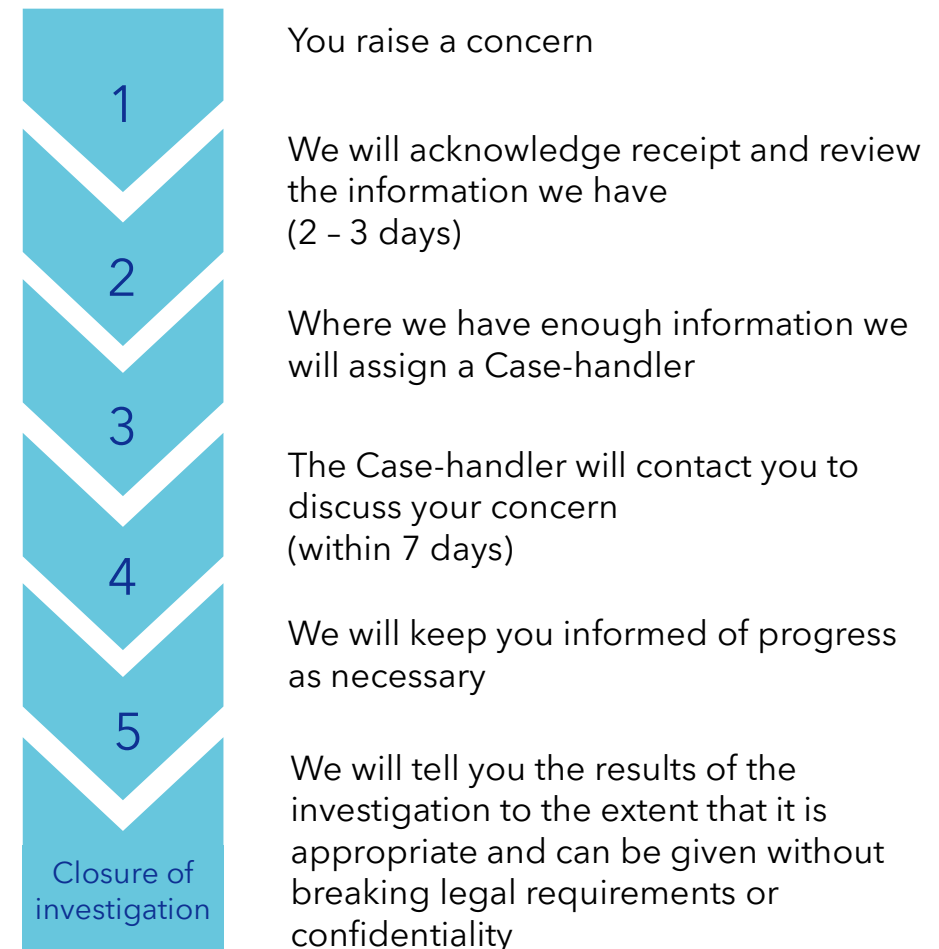
All Speak Up concerns that are raised are logged into the Speak Up case management system and given to a case-handler, who will be independent of management involved in the concern. All cases are overseen by the Ethics Compliance team, unless the case is legally privileged, in which case it will be at the direction of the relevant General Counsel. All cases and investigations will be conducted with integrity, in an independent, fair and unbiased manner.

How long will it take to investigate and conclude my Speak Up case?

Once your case has been received, it will take on average 40 working days to complete. This depends on its complexity and the availability of those involved to be interviewed.

mycode.serco.com

When you raise an issue this is what you can expect..



Will I be expected to do anything during the investigation?

If you have raised a concern or are involved in a Speak Up case, you will be expected to cooperate and answer all questions honestly. You will also be required to keep any information relating to the case or the matter confidential.

What happens when the case is closed?

Once the investigation has been closed and any actions agreed, you will be informed by the person handling your case that it has been closed and of the findings as appropriate and that can be given without infringing legal requirements or other duties of confidentiality. For example for confidentiality, legal rights and privacy reasons, Serco cannot provide any details on the individuals involved or any disciplinary action taken.

What do I do if I think that my Speak Up case has not been handled appropriately?

If you think that your concern was not handled appropriately or that the investigation was not performed correctly, you can appeal. You can do this by submitting your appeal in writing to a member of the Group Ethics Compliance Department by emailing speakup@serco.com. The Group Ethics Compliance Department will review and handle your appeal.



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Contact Numbers



Contact numbers

Toll-free dial numbers:

Country	Number
Austria	0800-298871
Australia	1-800-267-057
Belgium	0800-77-855
Canada	877-517-2683
Czech Republic	800-144-561
France	0-800-91-8654
Germany	0800-1807647
Gibraltar	8800 followed by 877-517-2683
Hong Kong	800-90-5876

Country	Number
Italy	800-721458
Netherlands	0800-0225527
New Zealand	0800-747427
Saudi Arabia	800-850-0716
Spain	900876000
Switzerland	0800-000283
United Arab Emirates	800-0321043
United Kingdom	0808-234-9902
United States	877-517-2683

Please note that calling restrictions may apply in some countries when using mobile phones, pay phones or hotel phones. Alternative methods for reporting include use of a landline phone or reporting online.