

# Our Code - at a glance

## Manager's edition

### This is a shortened version of Our Code of Conduct

It's been designed for your convenience. It provides an overview of the things we stand for, and contains exactly the same information about Our Code as the at a glance guide given to every Serco employee.

However, there are two important additions for leaders and managers:

#### Our Code and the Serco Management System (Page 3)

In this section you'll find an addition, Your role as a manager. This gives you an overview of your responsibilities in making sure everyone knows Our Code, uses it, and lives it.

#### Manager's Briefing Notes (Page 5)

On Page 5 of this document you'll find briefing notes which provide all you need to train employees on Our Code and ensure their training is up to date. We've made this as simple as possible. Training sessions are brief and focused, and can even be done at a shift handover if required.

Although this shortened version of Our Code has been provided for your convenience, you remain responsible for understanding and following the complete text.



Know it.

Use it.

Live it.

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## Welcome

As you know, Serco is paid to provide public services. Whether it be in a hospital, in a prison, at an airforce base, on a railway, or in our central services groups who support our contracts, we get paid by taxpayers to provide services that are frequently vital to the country and to the people who rely on them.

Often we are supporting people at really difficult times in their lives, be they asylum seekers, prisoners, the unemployed or the sick.

It is therefore absolutely essential that we maintain the highest standards of behaviour in delivering these services. In our business, values really matter. They matter because our customers and service-users have to be able to trust that we will deliver our work with care and pride and that we will constantly try and improve what we do. Which is why you will see on the walls of many Serco offices our four values of Trust, Care, Innovation and Pride.

**Trust** means that we deliver on our promises; are open, straightforward and honest; do the right thing; and take personal responsibility for getting things done.

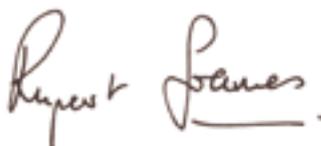
**Care** means that we take care of each other, and those we serve, and we aim to make a positive difference to people's lives.

**Innovation** means that we share our knowledge and experience and embrace change, knowing that if we don't provide innovation and value for money to our customers, our competitors will.

**Pride** means that we know that the work we do is important, and we take pride in doing it well.

To help bring our values to life in a tangible way, we have written a Code of Conduct, which describes the standards and behaviours we expect of people who work for Serco. It does not cover all situations, but I hope you will find it useful as a description of the standards you must meet and the types of behaviour we expect to see in our interactions with colleagues, with service users, with suppliers and with the wider community.

Please read the Code of Conduct and abide by it. We will be robust in our support of people who follow it and fierce dealing with those who don't.



Rupert Soames,  
Group Chief Executive  
Serco Group plc  
and proud of it



## What's Our Code for?

We all face situations at work when we're not sure what's the right thing to do. That's why we have a Code of Conduct. It makes it easy for us to understand what really matters, and act accordingly.

It defines the behaviours Serco expects from all of us, and what we can expect from Serco. It explains how we treat each other. The kind of workplace we all have a right to enjoy. And the treatment those we work among have a right to expect from us.

It gives us guidance to do our business honestly, fairly and openly. It outlines the things we should always do. And the things we must never do.

It gives us clear advice about how to ask questions when we're not sure what to do, and where to go for help and advice. When we see or hear about something that's wrong, it explains how to Speak Up.

So we all make the right decisions, and do what's right. And Serco is a place and a name that people trust.

" I know a supplier is using illegal labour. Should I report it?"

"If you Speak Up, they'll just sack you – won't they?"

"I know it's not right. But to win, we've got to do it. Haven't we?"

"They say 'Do the right thing', but that's whatever makes Serco money. Isn't it?"

"Can I use a supplier who's also a friend?"

## Our Code and the Serco Management System

Wherever we operate we must follow local laws and regulations.

But we also set ourselves our own standards of behaviour that we must all meet. And we have policies for different issues that we must all follow.

Our standards and policies are defined in the Serco Management System, which sets out the framework

in which all parts of Serco must operate.

You can find all these policies and standards online at Our World.

Our Code often refers to them. So if you're not sure about what our policy is on something, always check out the details here, or ask your manager.

[www.serco.com/codeofconduct](http://www.serco.com/codeofconduct)

## Our Values

First, foremost and without exception, Serco will live by its values. Our values and the behaviours we expect are:

### Trust

We work hard to earn trust and respect.

We deliver on our promises; are open, straightforward and honest; do the right thing; and take personal responsibility for getting things done.

### Care

We care deeply about the services we provide, the communities we serve, and we look after each other.

We work together to deliver high-quality public services, often of great importance to the nation or the communities we serve.

We take care of each other, and those we serve, and we aim to make a positive difference to people's lives.

### Innovation

We aspire to be better than anyone else at what we do.

We continuously improve our ways of working, and try new ideas, big and small. We share our knowledge and experience and embrace change, knowing that if we don't provide innovation and value for money to our customers, our competitors will.

### Pride

We want to be proud of what we do.

We know that the work we do is important, and we take pride in doing it well. We value energy and enthusiasm, skill and experience, and an ability to make hard work fun. We contribute both as individuals and as part of a team.



## Serco's Responsibilities

Wherever Serco operates, we must comply with local laws and respect human rights and dignity. We also set ourselves standards of behaviour and insist that they are met.

We should always act with integrity and honesty, and with consideration for the environments, communities and societies we work among.

Here is a list of the things you can expect from us. They are things we should always do; but we also need everyone's help to make sure they are always being done.

### We should always:

- Provide a working environment where Our Code and Our Values are actively supported.
- Make sure everyone who works for us or with us understands Our Code and knows how to apply it.
- Do our best to make sure everyone is complying with Our Code.
- Encourage everyone to seek help and advice if they are unsure about what to do, or concerned that Our Code is being violated.
- Provide confidential resources for everyone to get advice or report Code violations.
- Support and protect anyone who reports a violation or helps an investigation, and make certain there is no retaliation of any kind against them.
- Deal effectively with any concerns about conduct.
- Only work with partners, third parties and customers who share our ethical standards.
- Put improvements into place quickly after we have identified them, and remedy any wrongdoing we have identified as soon as possible.

### If you work for us, or with us, we expect you to always:

- Know, Use and Live Our Code.
- Attend all the training sessions we ask you to attend, so you learn how to live Our Code, and comply with all the laws, policies and regulations that apply to your job.
- Apply your good judgement to every situation, and ask if you're not sure what to do.
- Report any concern when you think there may be a violation of Our Code, and never knowingly allow or encourage anyone to do anything that violates Our Code.
- And co-operate fully if we ask you to help us investigate alleged violations.

## Your Role as a Manager

### 1 It's up to you to make sure everyone you manage:

- knows about Our Code;
- uses it whenever they are unsure about the right thing to do; and
- lives it every day.

You should check that everyone has their own at a glance guide, and is up to date with their training. You'll find an overview of the training and tracking requirements at the back of this document. We have made these as easy to implement as possible.

You must also know where there is a printed copy of our full Code of Conduct at your workplace.

### 2 "Everyone" means all those within our network of business relationships.

That includes suppliers, third parties and customers. It's your job to stay alert and watch out for any signals that Our Code is being broken in any part of the network where you work.

### 3 People will come to you with questions about Our Code. That doesn't mean you will know all the answers. If you're not sure about something, don't be afraid to ask.

You'll find answers to many frequently asked questions online. You can also ask your own line manager, divisional SMS lead or relevant policy owner. The details are available online at Our World under: The way we work/Serco Management System.

### 4 When someone has the courage to Speak Up it is essential that they are supported, respected, and protected from any kind of retaliation.

This is a critical part of your job. If everyone sees that we really do regard those who Speak Up as "heroes", we will have gone a long way to create a culture in which Our Code shapes our work, and people Know it, Use it and Live it every day.

### 5 Our Code defines our culture. But you create it.

You can find full details about your responsibilities online at Our World under: The way we work/Serco Management System.

## Manager's Briefing Notes

Follow this link: [www.serco.com/codeofconduct](http://www.serco.com/codeofconduct) and you'll find all the tools you need to ensure that staff are trained on Our Code, and their training is up to date.

### Overview of Training

The training tools have been designed to make training simple and effective, and to fit into limited time slots – for example, at a shift handover. The main tools you'll use are:

#### Videos

The full Code of Conduct video is part of Serco Essentials, a suite of training materials mandated for all members of staff.

The full Code of Conduct video is also provided in separate short video segments, each covering a particular element of Our Code.

These are available to download on Our World.

#### Dilemmas

Scenarios that ask people to think about what they'd do when faced with important issues in Our Code. There are four Dilemmas for each issue.

#### Training Guide – PowerPoint (PPT) presentation

A facilitator's presentation pack that provides you with everything you need for presenting and discussing each section of Our Code. You can adapt this to your workplace.

### Annual Mandatory Training

All employees must watch the full Code of Conduct video each year. You can use the presentation template to help you introduce the video. It is important that after the video has been shown, staff are given the opportunity to ask questions. You should use the printed copy of the full Code of Conduct as a reference guide to help answer employee's questions.

In setting up for the training you need to ensure that:

- You have the appropriate equipment to show the presentation, and both the video and sound work;
- You have a hard copy of the Code of Conduct to refer to;
- You are familiar with the materials on the link.

The video should also be shown as part of the induction process for all new employees. You need to keep a record of those employees who have watched the full video to demonstrate compliance with this mandatory training requirement. Use the training attendance record provided on the link.

### Ongoing Training

Training on Our Code should not just be an annual exercise. The full Code of Conduct video is therefore also provided in separate short segments. These are designed to help you use Our Code to engage employees on a number of issues throughout the year.

All of the videos are available on Our World by clicking on The Way We Work, through to the Serco Management System and Our Code of Conduct. It's important to engage people in thinking about the issues involved, and to get them to realise that they are empowered to do what's right and Speak Up. A typical session might run as follows:

- **Introduction** – what this session will cover (PPT)
- **Run the video** – for the section of the Code you are going to explore.
- **Dilemma 1** – Ask people to discuss one of the Dilemmas around the focus issue for this session.
- **What Our Code says** – Review and discuss what Our Code says about this issue (PPT).
- **Dilemma 2** – Now ask people to discuss a second Dilemma, knowing more about Our Code.
- **"Living Our Code"** – what to do if you have a question or concern, or need to Speak Up (PPT).

It's important that you make it clear you are there to help with issues, and support and protect anyone who has the courage to Speak Up.

### Keeping on Track

**All staff must be trained on Our Code, and their training must be up-to-date.**

It is important you maintain a record of all training undertaken. Your records should show that every employee has seen the full Code of Conduct video on an annual basis.

Training on Our Code is a mandatory part of the induction process for any new employee, and must be completed as soon as possible.

**You are responsible for making sure this happens for all the staff you manage.**



# Our People

Serco is all of us – who we are, and what we do. So we want it to be a great place for all of us to work. A place where we all feel valued, and there's equal opportunity for everyone to grow and develop.

"I know a supplier is using illegal labour. Should I report it?"

## Human Rights

Our business can have a positive or negative impact on the human rights of all those that are involved with us. These are the basic rights every person has to be treated with respect and dignity. We always seek to respect and protect people's rights and not work with anyone who we know is abusing them.

"A disabled colleague's not being allowed to apply for a post because of his condition. That's not right is it?"

## Fair Treatment

We want to work in a place we all trust, where everyone's talents get the best chance. So we treat everyone fairly and equally, and value difference and diversity. We employ, promote and reward people based on their talent and merit – nothing else. We won't tolerate any form of discrimination.

"They're bullying a colleague. Should I Speak Up?"

## Bullying, Harassment and Violence

There's no room for any kind of bullying, harassment or violence. No one should ever feel threatened or intimidated here. So if you see it or experience it – Speak Up. We'll support you and take action if we need to.

"A colleague's turning up to work drunk. He's a friend. What should I do?"

## Substance Abuse

Staying safe also includes protecting our workplace from the risks created by those who abuse drugs, alcohol and other substances.

They can have serious impacts on safety and health at work, and we want to protect everyone from that.

"I don't think what they're doing is safe. But what can I do?"

## A Safe Workplace

Serco should also be safe. None of us should come to any harm because of the work we do.

That's why we all need to follow the programmes that are there to keep everyone safe and well.

And take personal responsibility for the things we must each do for our own safety, and the safety of those around us:

- Like wearing the right equipment.
- Always working within any method statement or risk assessment that applies to our job.
- Only operating equipment if we're fully qualified.
- Never fooling around when there are risks.
- Reporting any accident or dangerous occurrence.
- Reporting any conditions or work practices that aren't safe.
- Always asking if we're not sure how to do something safely.

So together we work towards achieving our vision of Zero Harm.



## Our Business

We are a large company working in many parts of the world. As a result, we have a considerable impact on society, the economy and the environment. We want that impact to be beneficial. We want to make a positive difference to people's lives.

That means living Our Values and living by our standards everywhere.

Our business integrity depends on your integrity. We rely on you to do what's right, and protect our reputation.

"One of our partners is overbilling a customer. But only slightly. Better to keep quiet?"

"It's just a small facilitation payment. Everyone does it around here. We won't get the job done if we don't."

"A supplier's given me this really generous gift. Can I accept it?"

### Our International Profile

We do business in many countries, and have a big impact on our world. We want it to be beneficial.

So as well as following the many laws and regulations we must obey, we rely on each other to do what's right.

### Fair Markets

We want everyone to trust that we will compete fairly, openly and honestly. So we never fix prices or try to control supplies.

And we never boycott customers or suppliers, or enter into any other anti-competitive agreements.

### Working with Partners and Competitors

We always provide accurate information, and never try to cheat anyone, whether we're working on our own, or with partners and competitors.

### Working with Others

We deal fairly, honestly and transparently with suppliers and third parties, and expect them to be fair and honest too. We won't work with anyone who tries to cheat.

### Working with Communities

We want to improve lives. So we support our communities, and actively encourage social and charitable activities and volunteering.

### Respecting the Environment

We want to help build a better world for future generations. So we treat the environments we work in and the people we work among with care, respect, and thoughtfulness.

And we do all we can to prevent environmental damage and minimise our use of energy and resources.

### Hiring Government and Competitor Employees

When employees from clients or competitors come to work for us, we don't turn what they know into an unfair competitive advantage.

There are particularly strict rules about employing those who have worked with governments or have held political posts, and we need to follow them carefully.

### Political Activity

We contribute to public debates. But we never try to influence government decisions illegally or dishonestly.

### Bribery and Corruption

No matter what "local custom" might be, we never give or take any kind of bribe. That includes even the smallest facilitation payment.

It may seem minor, and it may seem like there are good reasons to pay. But there never are. Even on the smallest scale, corruption is corrosive and can severely damage our reputation.

### Gifts and Hospitality

Exchanging gifts and hospitality can build goodwill. But unless we're careful, they can look like a bribe. That's why we have clear procedures we all need to follow, and must all register any gift or hospitality we receive at <https://gandh.serco.com>.

### Fraud

Even if it's unproven, fraud can destroy our reputation.

So we leave no room for doubt and make sure our books, records and financial reporting are always accurate and honest. That includes all our claims, our expenses, and our time.

### Insider Trading

If you know about something that could affect our share price and you try to take advantage by buying or selling company shares, that's insider trading. It's illegal, and we have strict rules to stop it happening.

### Conflicts of Interest

When your own interests could interfere with Serco's, it's a conflict of interest. For example if you employed your partner as a supplier.

Conflicts of interest can improperly influence our judgement, and may lead us or someone we know to try to benefit at the expense of Serco.

In the same way, if Serco ends up with an unfair competitive advantage – for example by employing someone who might influence government decisions – that's an Organisational Conflict of Interest.

We never want to be accused of trying to gain an unfair advantage. So whenever you think there may be a conflict, you should raise it at once.



To find out more, go to [www.serco.com/codeofconduct](http://www.serco.com/codeofconduct) or ask your manager for a full copy of Our Code

# Our Information

It's the job of every one of us to protect the information and ideas that give us our competitive advantage.

## Confidential Information

We make sure confidential information about Serco, our people, our customers, or our partners and suppliers never falls into the wrong hands.

And because it's so easy to say something or reveal information we didn't mean to get out, we take particular care when we're online or using mobile devices.

## Personal Information

We handle personal information about those we employ, our customers, partners and users of our services. We all have a duty to respect this information and ensure it is protected and handled responsibly and only used for the purpose for which it was provided.

Always respect the privacy of individuals and never disclose personal information to anyone who doesn't have the right to see it or the need to know it.

## Securing Information and Using Our Systems

We use Serco's computer systems and printed archives responsibly. And we follow all the procedures – like those for passwords, log-ins and how we use the Cloud.

So valuable information stays secure, and isn't accidentally disclosed, changed or deleted.

## Social Media

Social media give us lots of new opportunities to communicate and collaborate.

But we also need to take care to protect our people and reputation. We are each responsible for what we say online.

## External Communications

Our reputation is affected by what people hear about us, either directly or through the media. So what any of us say really matters.

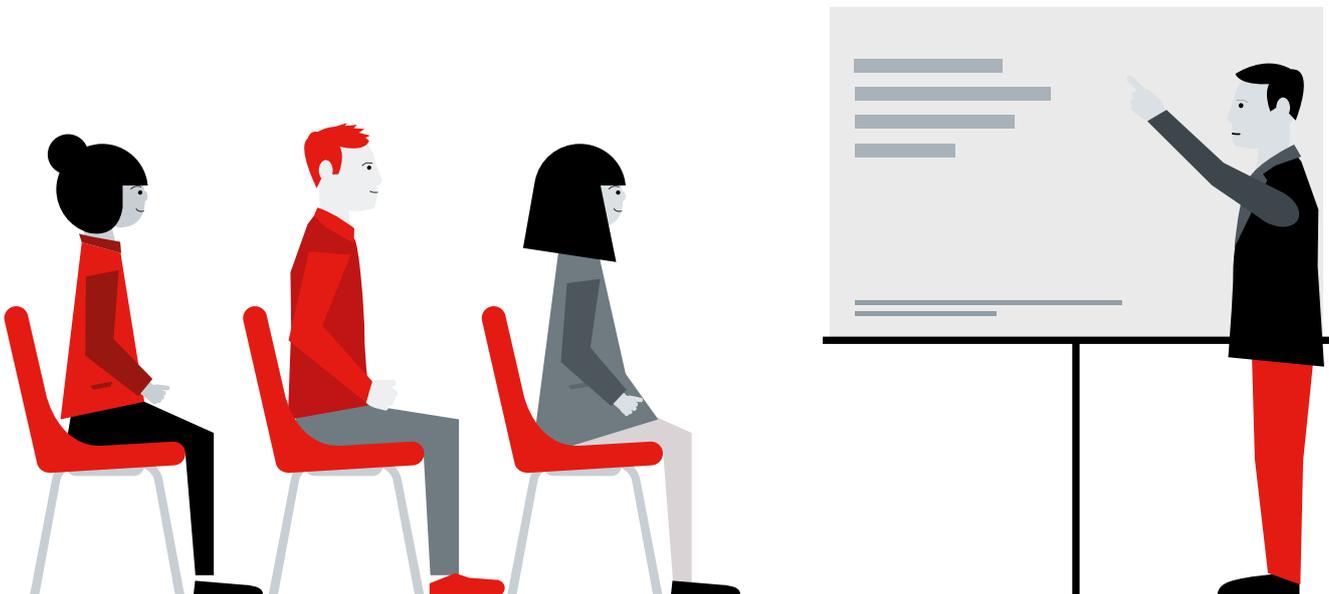
That's why we don't start rumours or talk idly. And we never speak on behalf of Serco if we're not authorised to.

"A colleague is copying personal data from the Company's database, I think it is to give to a new supplier. That's okay, isn't it?"

"A colleague's bad-mouthing team members on social media. Is it any of my business?"

"I urgently need to get a file from a sick colleague's computer. I know her password and she says it's okay. It is, isn't it?"

"Our email's down and I've got to get these to my boss. OK to use hotmail?"



## Living Our Code

We need everyone to do what is right, and Speak Up when they believe Our Code is being broken. But sometimes that's a hard thing to do.

You can feel under intense pressure. Frightened. Lonely. Unprotected.

We want you to know you are not alone. We will listen. We will help. We will advise. We will protect you.

And we absolutely will not allow any retaliation against you.

## If you're not sure what to do...

...use the Decision Making Guide or try our SayNo Toolkit which has been designed to help you find answers to lots of issues you might face when dealing with suppliers and third parties.

You can find the SayNo Toolkit and app online at <http://serco.saynotoolkit.net> or download the app using one of the links available from our online version of Our Code.

### Decision Making Guide

This simple guide gives you a step-by-step process to work things through to a clear conclusion.

Take time to follow each step and carefully answer all the "ask yourself" questions.

"Isn't it just better to stay quiet?"

"I'm frightened my manager will retaliate. And what about my colleagues?"

"I want to report something. But will I really be protected?"

"If you Speak Up, they'll just sack you – won't they?"

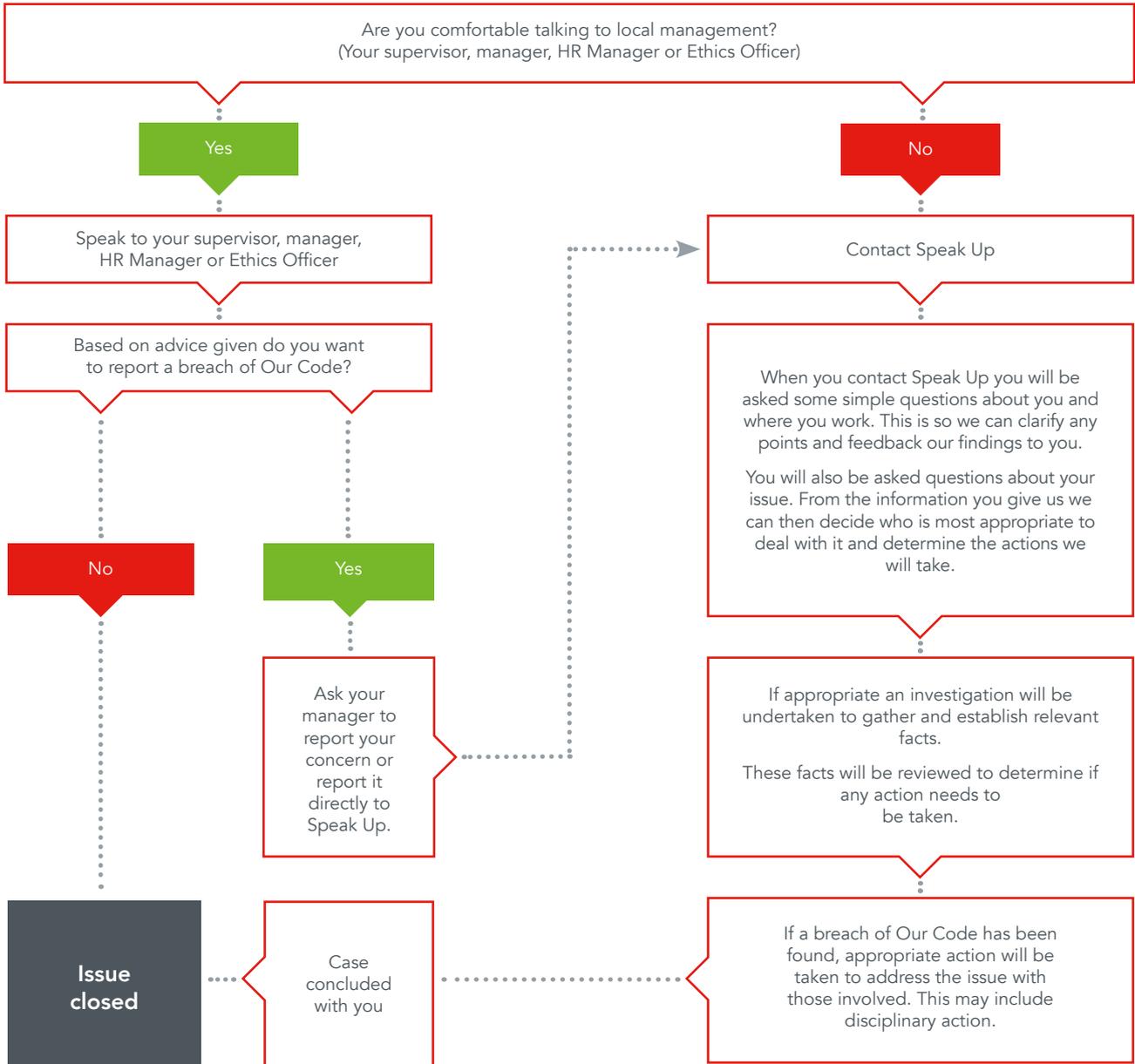


To find out more, go to [www.serco.com/codeofconduct](http://www.serco.com/codeofconduct) or ask your manager for a full copy of Our Code

# If you've got a question or concern...

If you have a question, ask your manager, human resources or ethics lead. Or you can ask a question online by going to [serco-speakup.com](http://serco-speakup.com)

If you have a concern there are a number of paths you can follow:



## If you think you should report something here's how you Speak Up

No matter where you work in Serco, if you believe Our Code is being broken, then you should Speak Up.

Sometimes it's not easy, but it's always right

We absolutely prohibit retaliation towards anyone who reports a violation or helps an investigation, and we will protect you and respect you for having the courage to live Our Code.

First speak to local management (your supervisor, manager, Human Resources or Ethics Lead).

If you're not comfortable doing that, then you can contact the company in confidence through the Serco Speak Up line. To call toll free use the numbers provided below.

Or you can report online by going to: [serco-speakup.com](https://serco-speakup.com)

You can also email a report, or problems with the hotline numbers, to [speakup@serco.com](mailto:speakup@serco.com) (for Serco Americas use [speakup@serco-na.com](mailto:speakup@serco-na.com))

### Or you can write to:

Company Secretary, Serco Group plc,  
Serco House 16,  
Bartley Wood Business Park,  
Bartley Way, Hook, RG27 9UY, UK

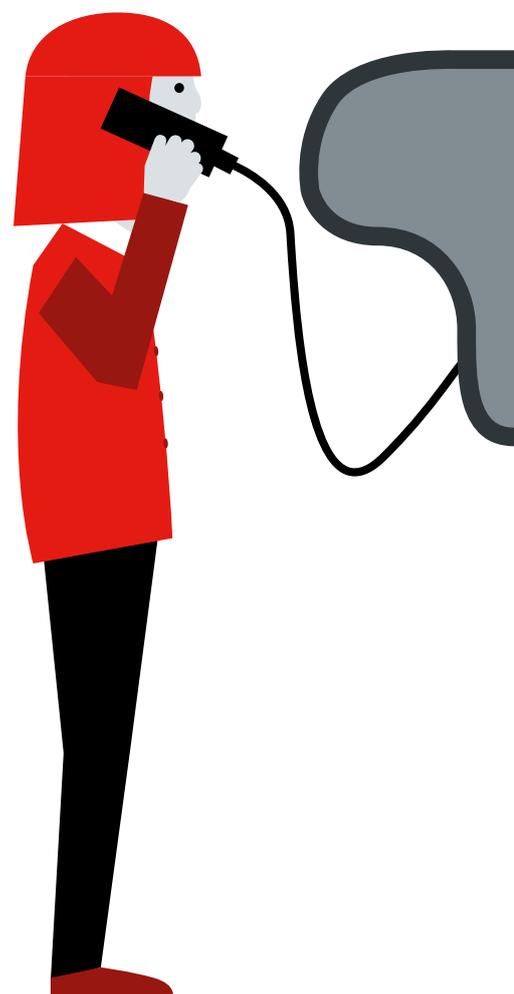
### Direct dial numbers

Country	Number
Australia	1-800-267-057
Bahrain	8000-0199
Belgium	0800-7-6194
Canada	800-969-6363
France	0-800-91-8654
Germany	0-800-180-6762
Hong Kong	800-90-5876
Italy	800-789938
New Zealand	0800-452479
Qatar	00800-100-380
Spain	900-99-1281
Switzerland	0800-56-1326
United Kingdom	0808-234-9902
United States	800-969-6363

Dial the code shown below, then when prompted, dial the following toll-free number:

Direct Access Code	Dial	Followed by
Gibraltar	8800	877-517-2683
Ireland	1-800-550-000	877-517-2683
Ireland (UIFN)	00-800-222-55288	877-517-2683
Netherlands	0800-022-9111	877-517-2683
Saudi Arabia	1-800-10	877-517-2683
UAE	8000-021	877-517-2683
UAE (Military-USO & cellular)	8000-061	877-517-2683
UAE (du)	8000-555-66	877-517-2684

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.



At Serco we're all responsible  
for knowing Our Code, using  
it – and living it.

**Serco Group plc**

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