

Business Conduct and Ethics

We believe that the world's leading companies must set and achieve high standards of performance and behaviour.

We are clear about what we believe in and the ethics and business standards we will operate to. These standards define: expected individual and corporate behaviour in relation to all business conducted on the Company's behalf; reflect our values of Trust, Care, Innovation and Pride; provide direction on compliance with relevant laws and regulatory requirements where we work; and are sensitive to local customs, traditions and cultures.

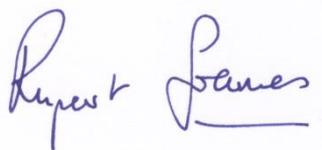
We will:

- provide a working environment where our values, policies and Code of Conduct are actively supported
- make sure everyone who works for us or with us understands the values we live by, our policies and code
- compete legally, fairly and ethically, making sure the decisions we make promote competition in business, seek to protect our customers' interests and avoid situations that may or may appear to create a conflict of interest
- not falsify records or misrepresent facts, recording and reporting information about our business accurately, honestly and transparently
- not make irregular payments or payments in kind to win business, encourage others to act improperly or influence a decision in our favour
- not participate in any form of corrupt behaviour, either directly or indirectly, anywhere in the world
- not give or receive bribes, facilitation payments or gifts or hospitality that may improperly influence a business decision or judgement
- recognise the principles in the Universal Declaration of Human Rights and not take part in, or benefit from, any activity that breaks any law relating to human rights
- respect human rights in our operations and use international human rights standards, such as the UN Guiding Principles on Business and

Human Rights, as a framework: to identify, assess and monitor adverse human rights impacts; prevent or mitigate causing or contributing to such impacts; and to address such impacts should they occur

- not engage in any form of human trafficking or use forced, compulsory, illegal or child labour, or knowingly work with anyone who does
- contribute to public debates about policies that affect our business. However, we will always be impartial about party politics
- only work with partners, third parties and customers who share our ethical standards
- encourage everyone to seek help and advice if they are unsure about what to do, or concerned that our values, policies or code are being violated
- provide confidential resources for everyone to report such violations and make certain there is no retaliation of any kind against them
- put improvements into place quickly after we have identified them, and remedy any wrongdoing we have identified as soon as possible

We will put this policy into practice by applying effective standards, operating procedures and processes to ensure we operate our business in an ethical and responsible way.



Rupert Soames
Group Chief Executive
Serco Group plc