

ingeus

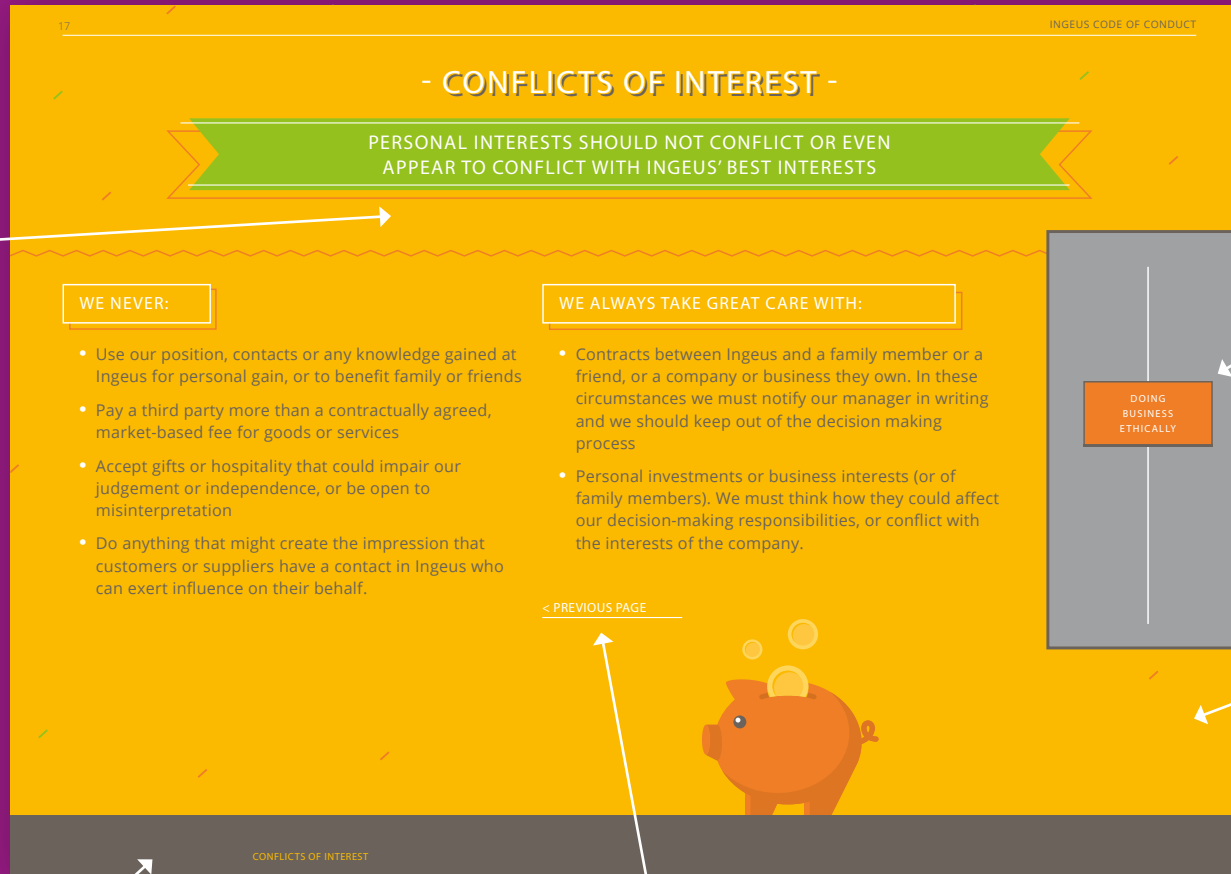
- HOW TO -

DO THE  
RIGHT  
THING

# - HOW TO USE THIS DOCUMENT -

## DEFINITIONS DROPDOWN

Move your cursor over the white section of the banner to reveal a detailed definition for that section.



## SIDE NAVIGATION

Use these buttons to navigate between the five main chapters of the document.

## CONTENTS BUTTON

Click this button to return to the contents page at the start of the document.

## FOOTER NAVIGATION

The footer displays all sections within the current chapter. Click to jump to any section.

## PAGE NAVIGATION

Use these links to navigate between the pages of individual sections.

# INTRODUCTION

## OUR CODE OF CONDUCT: HELPING YOU TO DO THE RIGHT THING

At Ingeus we have the privilege – and the huge responsibility – of helping people who are often vulnerable, to make a positive change in their lives. We don't take that responsibility lightly. As an employer, it's Ingeus' responsibility to make sure that you have the support you need to do this important work. You're asked to make decisions and judgements every day and this Code of Conduct is your guide to help you do the right thing.

At Ingeus we are proud to have company values that have been both created and are lived by our employees, it's what makes Ingeus special. We always conduct ourselves in an ethical manner and take pride in everything we do. That is why we are confident that this code will not be anything new to you but rather an 'official' guide to support the way we already go about our work.

And, it's not just how we work with the people that are on our programmes, it is how we conduct ourselves with our colleagues, our partners – all of our stakeholders. This code is something that applies to everyone regardless of role or position in the company.

However, for the code to be effective, it has to be championed by all of you – you have to 'own it'. So, let's embrace this Code of Conduct and continue to work in a way that aligns with our ethics and our values.

### INTRODUCTION

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INTRODUCTION

# - INGEUS VALUES -

EVERY DAY AT INGEUS WE HAVE CONVERSATIONS AND INTERACTIONS THAT HELP PEOPLE TO CHANGE THEIR LIVES.

Everyone has a part to play in that and the way we approach this important work is what sets us apart. That 'way' is rooted in our values that really capture the essence of what binds us together.

## — DO THE — RIGHT — THING —

### WE DO:

- Act with integrity
- What we say we'll do
- Build trust and have honest conversations
- Consider the impact of our actions on others.

### WE DON'T:

- Turn a blind eye
- Make promises we can't keep
- Take short cuts
- Act without first thinking.

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# - INGEUS VALUES -

## CARE —AND— RESPECT

### WE DO:

- Always listen and respect others' views
- Embrace difference
- Care about people and what they do
- Treat everyone fairly.

### WE DON'T:

- Accept unfairness or inequality
- Think that 'one size fits all'
- Assume we have all the answers.

## —TAKE— PRIDE

### WE DO:

- Strive for excellence and to be the best we can be
- Celebrate our achievements
- Adapt, change and innovate to deliver great results
- Go the extra mile.

### WE DON'T:

- Get complacent
- Settle for second best
- Rest on our laurels
- Accept poor quality.

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# - INGEUS VALUES -

## OWN — IT —

### WE DO:

- Ask “what else can we do to make this happen?”
- Take accountability
- Show leadership at every level
- Take on new challenges.

### WE DON'T:

- Take the easy way out
- Shy away from our responsibilities
- Pass the buck
- Avoid things because they are difficult.

## BELIEVE — IN — EVERYONE

### WE DO:

- Encourage people to believe in themselves
- Challenge ourselves and others to make positive change
- Value our colleagues and know we can achieve more together
- Believe in everyone's capability to change.

### WE DON'T:

- Put limits on what people can achieve
- Hold back ideas that could help others
- Ever let anybody feel that they don't belong
- Let negativity be the focus.

### INTRODUCTION

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# - EVERYONE MUST DO THE RIGHT THING -

## RESPONSIBILITIES OF EMPLOYEES, MANAGERS AND SENIOR MANAGERS

### WHAT DOES THIS MEAN IN PRACTICE?

**All employees** are required to read the code. They should understand the code and comply with it. We also expect employees to report situations where they are concerned that the code has been breached.

**All managers** are responsible for providing support to their teams to understand the requirements of this code and how to comply with it.

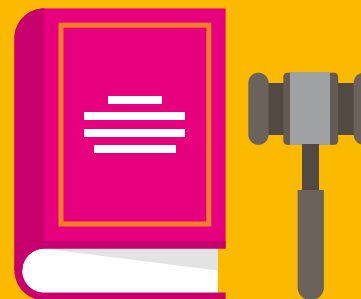
**Members of the senior management team** are responsible for providing assurance on these matters to the Ingeus Board.

**The executive** is responsible for implementation of the code, and through its committees reviewing compliance and ensuring that appropriate action is taken where breaches of the code are found.

### WHAT IF THERE IS A BREACH?

The consequences of not complying with this code can be very serious, including damage to our reputation, fines and even criminal liability.

Any failure to comply with this code or its supporting policies will be fully investigated and appropriate action taken. Depending on the circumstances, this may include training, discipline, or other corrective action, up to and including termination of employment.



### INTRODUCTION



# ASK YOURSELF:

## WHEN SHOULD I BE CONCERNED?

### IS IT LEGAL?

If you don't know, check with a relevant expert in the field.

### IS IT CONSISTENT WITH THE INGEUS VALUES?

If it is not aligned with our values, you really shouldn't do it.

### IS IT CONSISTENT WITH OUR CODE?

Consider whether what you are proposing or have witnessed falls within any of the categories in this code.

### AM I PERSONALLY COMFORTABLE WITH IT?

Don't ignore your gut instincts or conscience, they will be right a lot of the time.

### WOULD I BE HAPPY READING ABOUT IT IN THE NEWSPAPERS?

If not, it's probably the wrong thing to do.



### INTRODUCTION

## SPEAK UP / ANTI-RETALIATION POLICY

If you become aware of something that may not be consistent with our values or any of our policies, don't keep it to yourself or ignore it, speak up.

At Ingeus we have high standards of integrity, and we all have a duty to ensure the company maintains them. Doing the right thing means bringing anything you are concerned about to the attention of management.

You don't have to be right – you just have to believe reasonably that the information you have is accurate.

We will do our best to maintain confidence over anything that you report, and only communicate on a need to know basis or where the law requires it. No one's career or reputation will be adversely affected because they have done the right thing. That is why any retaliation or discrimination of any kind will not be tolerated against a person who has raised something in good faith. If you believe you or anyone else is experiencing retaliation or discrimination, please report that as well.

We regard any such behaviour as a serious matter and we will act against it and protect those who do the right thing.

### INTRODUCTION



## HOW TO RAISE A CONCERN

### INCIDENT REPORTING CHANNELS

Certain issues have their own reporting channels such as safeguarding, information security and health and safety. You should continue to report incidents in accordance with the relevant policies applying to your business.

If, however, you do not feel that appropriate action has been taken to deal with incidents in accordance with those channels, then you should feel free to report the matter in accordance with our whistleblowing procedures.

### TELL YOUR LINE MANAGER

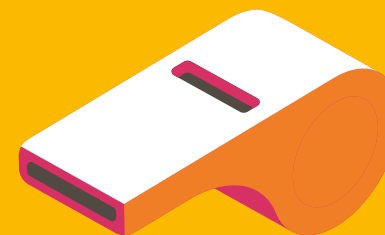
If you are concerned that something might be in breach of our code, in the first instance you should raise these concerns with your line manager.

If you feel you cannot tell your line manager, you should raise the issue with the next tier of management.

### IF YOU FEEL UNABLE TO TELL A MANAGER

If you believe that a manager is involved, or for whatever reason, feel unable to raise your concern with a manager you should follow the approach set out in our Whistleblowing Policy.

#### INTRODUCTION



# OUR PEOPLE

- AT INGEUS OUR PEOPLE ARE OUR GREATEST ASSET
- WE BELIEVE IN EVERYONE – WHATEVER THEIR BACKGROUND – AND ENCOURAGE THEM TO ACHIEVE THEIR MAXIMUM POTENTIAL
- WE ALWAYS ACT PROFESSIONALLY, AND TREAT PEOPLE WITH CARE AND RESPECT
- WE WANT TO CREATE AN ENVIRONMENT THAT IS DIVERSE AND INCLUSIVE
- WE PROVIDE EVERYONE WITH A SAFE WORKPLACE, WHERE THEY CAN GROW AND PROSPER.
- WE PROTECT THOSE WE WORK WITH WHO ARE VULNERABLE.

OUR PEOPLE



## - OUR EMPLOYMENT PRACTICES -

WE ARE COMMITTED TO HIRING THE BEST TALENT  
AND WILL TREAT EVERYONE FAIRLY

### WHAT WE MEAN:

At Ingeus, decisions about recruitment, development and promotion are made on the basis of a person's ability, skills, experience, behaviour, performance and potential for the job.

Our employees can expect a clear understanding of our goals and objectives, the performance standards and behaviour expected of them, and a fair evaluation of their performance.

If we employ the best people and give them an environment in which to grow and develop, we will achieve our business goals and keep them with us. Developing our people is the best way to develop our organisation.

### WE ARE COMMITTED TO:

- Employing people who will uphold our values
- Creating a working environment in which all our people feel valued and can "own it"
- Encouraging and supporting all our people to achieve their best
- Identifying and satisfying training and development needs so our people can perform and develop their potential
- A fair system of recognition, reward and promotion.

OUR PEOPLE



## - TREATING PEOPLE WITH COMPASSION, DIGNITY AND RESPECT -

WHEN WORKING WITH PARTICIPANTS AND STAFF, WE WILL ACT IN A PROFESSIONAL MANNER AND TREAT EVERYONE WITH COMPASSION, DIGNITY AND RESPECT

### WHAT WE MEAN:

At Ingeus, when someone comes through our doors or onto one of our programmes they can expect to be treated with care and respect. We recognise that how we deliver our services is as important as the skills and tools that we use to improve the lives of our participants, and the outcomes we achieve for them.

The people we serve are often vulnerable, and many have experienced difficult personal circumstances before they reach us. It is imperative that we seek to understand their issues and deliver our services in a way that recognises everyone's needs are unique. By treating those we work with in a professional, courteous manner we can achieve more and continue to change lives for the better.

### WE ARE COMMITTED TO:

- Providing a professional, clean and safe environment for our participants and staff
- Treating our participants with care and respect
- Being compassionate and caring about the outcomes we can achieve for participants
- Being non-judgmental and seeking to understand our participants' needs and requirements
- Listening to any complaints or feedback about our service
- Providing equal opportunities for all participants while taking into account their diverse needs and personal circumstances
- Making reasonable adjustments to our services for people with disabilities.

OUR PEOPLE



## - INGEUS IS COMMITTED TO THE -

### 10 DIGNITY DO'S

Led by the National Dignity Council, the 10 Dignity Do's ensure that individuals and organisations put dignity and respect at the heart of UK care services to enable a positive experience.

IN LINE WITH THE 10 DIGNITY DO'S, WE:

1. Have a zero tolerance of all forms of abuse
2. Support people with the same respect you would want for yourself or a member of your family
3. Treat each person as an individual by offering a personalised service
4. Enable people to maintain the maximum possible level of independence, choice and control
5. Listen and support people to express their needs and wants
6. Respect people's right to privacy
7. Ensure people feel able to complain without fear of retribution
8. Engage with family members and carers as care partners
9. Assist people to maintain confidence and positive self-esteem
10. Act to alleviate people's loneliness and isolation.

OUR PEOPLE

# - EQUALITY, DIVERSITY AND INCLUSION -

WE TREAT EVERYONE FAIRLY AND EMBRACE DIFFERENCE

## WHAT WE MEAN:

We value difference, and believe diversity of people, skills and abilities is a strength that helps us to achieve our best. We also believe everyone should be recruited and promoted on the basis of their personal ability, contribution and potential. Everywhere across our organisation we promote a culture of fairness, respect and equal opportunity for all.

We work with large numbers of individuals with mental health problems and disabilities and we are committed to providing opportunities for them. We want to be seen as an expert in this field, and we will seek out and work with partners, such as specialist charities, to ensure our service offering to those with disabilities is best in class.

Our participants come from a diverse range of cultural and socio-economic backgrounds. Everyone is welcome at Ingeus, no matter their race, sexuality, gender identification, religion or any other characteristic.

We will seek to understand people's difference to provide them a better service, but we will never judge them because of it.

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OUR PEOPLE



# - EQUALITY, DIVERSITY AND INCLUSION -

WE TREAT EVERYONE FAIRLY AND EMBRACE DIFFERENCE

## FOR INGEUS EMPLOYEES WE ARE COMMITTED TO:

- Providing equal opportunities for all
- Maintaining an inclusive work environment free from discrimination
- Complying with all employment laws
- Ensuring that we have diversity of thought at all levels in our organisation
- Hiring the best people
- Promoting talent on the basis of merit.

## FOR PARTICIPANTS WE ARE COMMITTED TO:

- Treating them with care and respect
- Seeking to understand their diverse backgrounds while recognising their right to privacy
- Providing equal opportunities regardless of backgrounds
- Making reasonable adjustments to our services for those with disabilities
- Listening to feedback and acting on it where appropriate.

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OUR PEOPLE



## - BULLYING AND HARASSMENT -

WE DO NOT TOLERATE ANY KIND OF BULLYING OR HARASSMENT  
BY OR AGAINST ANYONE WHO WORKS FOR OR WITH US

### WHAT WE MEAN:

At Ingeus, everyone is respected and has the chance to flourish. We do not tolerate behaviour or attitudes that make people feel humiliated, harassed or discriminated. Wherever we observe such behaviour, we always challenge it and support others who do so.



### WE ALWAYS:

- Speak up and do something about harassment, bullying or discrimination. This can be by or against another staff member, someone we are providing services to, or any of our other stakeholders
- Encourage and support those who challenge or report such behaviour.

### WE NEVER:

- Tolerate any action or behaviour that could be viewed as harassment or bullying
- Make inappropriate jokes, try to humiliate a colleague or participant, or spread gossip and rumours that might be, or could be perceived as, hurtful and disruptive
- Threaten a colleague or participant with physical or verbal violence.

OUR PEOPLE

## - HUMAN RIGHTS -

WE REFUSE TO DO BUSINESS WITH ANY ORGANISATION THAT FAILS TO UPHOLD THE FUNDAMENTAL PRINCIPLES OF HUMAN RIGHTS

### WHAT WE MEAN:

Wherever we work, we uphold the rights of all those who work for or with us, and of the communities in which we operate. We will refuse to do business with any individual, company or organisation that fails to uphold the standards and principles of basic human rights, or has links with an oppressive regime that gives us cause for concern.



### WE ARE COMMITTED TO:

- Supporting all the principles set out in the United Nations Universal Declaration of Human Rights
- Supporting international standards regarding child labour and minimum age of working
- Opposing modern slavery and human trafficking and ensuring that our supply chain does not use these practices
- Complying with national legal requirements regarding wages and working hours
- Observing, protecting and promoting these rights wherever we operate.

OUR PEOPLE

## - HEALTH AND SAFETY -

EVERYONE WHO WORKS FOR US IS ENTITLED TO DO SO IN A SAFE AND SECURE ENVIRONMENT THAT WILL NOT HAVE A NEGATIVE EFFECT ON THEIR HEALTH

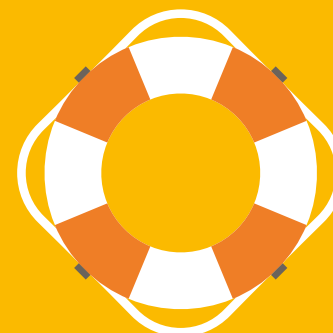
### WHAT WE MEAN:

We believe that nobody should ever be exposed to unnecessary risk because they work for us. Everybody has the right to go home in the same state as they come to work. Clients, participants and members of the public are also entitled to expect us to make sure our activities do not harm them.

We recognise our responsibilities under health and safety legislation, and we will take steps to support our employees, our contractors and service partners to conduct their activities for us and participants in a way that is safe and without risk to health.

### WE ALWAYS:

- Promote safe and healthy working and take care of ourselves, our colleagues, our clients and participants, and the public
- Challenge and report anything we believe is unsafe
- Understand and comply with all our policies, rules and procedures on safety, and understand how they apply to our work
- Understand the hazards and risks associated with our work and provide suitable information, instruction and training to ensure safe and successful service provision.



OUR PEOPLE

## - SAFEGUARDING -

WE WILL TAKE ACTION TO PROMOTE THE WELFARE OF CHILDREN, YOUNG PEOPLE AND ADULTS WHO COME INTO CONTACT WITH US, AND TAKE STEPS TO PROTECT THEM FROM HARM

### WHAT WE MEAN:

We have a duty of care to staff and participants we come in contact with. A safeguarding concern is anything that may cause worry about another person or contributes to a person feeling uncomfortable or unsure about the safety or welfare of someone else or themselves (including indications of potential radicalisation and expressions of extremist views). Therefore, any concern must be raised in line with the appropriate procedures and reported to the Safeguarding Assurance Manager. This may also mean the appropriate sharing of information to external organisations or agencies in order to safeguard the wellbeing of individuals.

### WE ALWAYS:

- Employ people who will uphold our values
- Maintain the wellbeing of our participants and staff

- Remain alert to any safeguarding concerns or indications someone may be at risk
- Respond to our duty of care and obligations under our contracts and the law to promote the safety of individuals
- Share and protect information in line with data protection laws and requirements
- Promote a strong safeguarding culture that aims to protect all individuals, especially if they have raised a safeguarding concern.

### WE NEVER:

- Ignore a safeguarding concern
- Ignore our legal obligations and moral duties
- Dismiss any individual who asks for help.

OUR PEOPLE

## - PREVENTION OF RADICALISATION -

WE HAVE A RESPONSIBILITY TO PREVENT PEOPLE  
FROM BEING DRAWN INTO TERRORISM

### WHAT WE MEAN:

It is vital we are considerate of any indications of radicalisation or expressions of extremist views. These are a safeguarding concern and, as such, must be raised in the same way as any other safeguarding concern. This may also mean the appropriate sharing of information with relevant authorities.

This is applicable to every individual regardless of age, gender, background or position with Ingeus, and could be a participant or staff member.

### WE ALWAYS:

- Maintain the wellbeing of our participants and staff at the centre of our work
- Remain alert to any concerns or indications someone may be at risk

- Respond to our duty of care and obligations under our contracts and the law to, as much as possible, prevent radicalisation
- Share and protect information in line with data protection laws and requirements
- Promote a strong culture that aims to protect individuals.

### WE NEVER:

- Ignore circumstances where there could be a risk of radicalisation
- Ignore our legal obligations and moral duties.

OUR PEOPLE

# DOING BUSINESS ETHICALLY

- WE CONDUCT OUR BUSINESS ETHICALLY AND ONLY CLAIM PAYMENT FOR WORK WE HAVE DONE
- WE NEVER SEEK TO GAIN FINANCIAL ADVANTAGE THROUGH DECEPTION, UNFAIR COMPETITION, OR BRIBERY
- WE ONLY WORK WITH THOSE WE TRUST, AND AVOID SITUATIONS WHERE INDIVIDUALS OR BUSINESS RELATIONSHIPS CAN IMPACT OUR REPUTATION NEGATIVELY
- WE THINK ABOUT HOW OUR ACTIONS CAN BE PERCEIVED.



DOING  
BUSINESS  
ETHICALLY



## - FRAUD -

WE WILL NOT DEFRAUD ANYONE OR ACT DISHONESTLY  
AND WE WILL PROTECT THE COMPANY AGAINST FRAUD

### WHAT WE MEAN:

We will never knowingly seek to gain any advantage of any kind by acting fraudulently, deceiving people or making false claims, and we won't allow anyone else to do so on our behalf. This includes defrauding or stealing from the company or any third party, and any kind of misappropriation of property.

### WE ALWAYS:

- Take great care when spending the company's money
- Act honestly, fairly and openly
- Make sure our books and records are accurate, complete and not misleading
- Carefully check or inspect things that are our responsibility

- Base all invoices, purchase orders and claims on clear and complete information and check they comply with contractual arrangements
- Report any potential fraud against the company as soon as we become aware of it.

### WE NEVER:

- Falsify our company expenses, or claim from the company for expenses that have not been properly incurred in carrying out company business
- Use the company's money or resources for an improper purpose
- Ignore something that we suspect might involve fraud or deception
- Withhold payment when we don't honestly believe we are entitled to do so
- Make false claims.

DOING  
BUSINESS  
ETHICALLY



## - FALSE CLAIMS -

WE WILL ONLY CLAIM FOR WORK WE HAVE DONE  
AND WHICH IS BACKED UP BY EVIDENCE

### WHAT WE MEAN:

At Ingeus, we need to be able to evidence everything we get paid for. Even if we have done the work, making a claim for that work while fabricating evidence could amount to fraud, even if supported by the client. If you think something might be wrong, it probably is.

### WE RISK MAKING A FALSE CLAIM IF WE:

- Claim for something we don't honestly believe we are entitled to
- Knowingly or recklessly misrepresent or inaccurately record time spent or services provided
- Fabricate evidence even if the client requests or supports what we are doing.



### WE MUST TAKE PARTICULAR CARE WHEN CALCULATING AND CLAIMING/APPLYING FOR:

- Payments
- Sustained outcomes
- Course completions
- Numbers of referrals or turn ups
- Losses and expenses
- Variations or changes to contracts.

### A CHECKLIST FOR CLAIMING PAYMENT:

- Have I done all I should?
- Am I happy I've been honest, open and transparent?
- Are all aspects of the claim backed-up by documentary evidence?

DOING  
BUSINESS  
ETHICALLY

## - BRIBERY AND CORRUPTION -

WE REFUSE TO OFFER, GIVE OR RECEIVE BRIBES OR IMPROPER PAYMENTS, OR PARTICIPATE IN ANY KIND OF CORRUPT ACTIVITY, EITHER DIRECTLY OR THROUGH ANY THIRD PARTY

### WHAT WE MEAN:

We will not offer, give or receive bribes, or make or accept improper payments to obtain new business, retain existing business, or secure any improper advantage, and we won't use or permit others to do such things for us. It is better to miss out on the business or lose money.

### WE ALWAYS:

- Take great care when spending the company's money
- Seek to avoid even the appearance of wrongdoing
- Record all payments and benefits provided to public officials
- Report any attempts to bribe us, or to solicit bribes from us, and any suspicions we have about bribery and corruption.

### WE NEVER:

- Participate in any form of corrupt behaviour
- Engage public officials to provide services without approval
- Conceal payments, or falsify or tamper with the company's books and records.



DOING  
BUSINESS  
ETHICALLY

## - FACILITATION PAYMENTS -

WE WILL NOT MAKE FACILITATION PAYMENTS IN  
ANY COUNTRIES IN WHICH WE DO BUSINESS

### WHAT WE MEAN:

Any type of facilitation payment is prohibited, large or small – it should be considered a bribe. Even where such payments are perceived as a common part of local business practice or acceptable under local law, and even if others engage in such practices, no violations of this principle can be tolerated. We would rather lose business than compromise our integrity.

Where a facilitation payment is being extorted and your safety or liberty or that of your family or another work colleague is under threat, then the company's duty is to support you. In these circumstances, you should make the facilitation payment, record it clearly, and report it at once to your Finance Director and your legal or compliance contact.

### LEGITIMATE FEES:

Sometimes a legitimate fee is payable for a speedy service provided by the government. For example, a published amount to get a visa quickly from a consulate. Payment of such fees is acceptable, provided there is a business need, payment is transparent and open, a receipt is obtained and the expense is properly recorded in our books.



DOING  
BUSINESS  
ETHICALLY

## - GIFTS AND HOSPITALITY -

WE MAKE SURE GIFTS OR HOSPITALITY AT WORK ARE REASONABLE, AND WE NEVER OFFER OR ACCEPT THEM IF IT MAY IMPROPERLY INFLUENCE A BUSINESS DECISION

### WHAT WE MEAN:

Any gifts or hospitality we receive or give in connection with our business should always be customary and reasonable in terms of value and frequency. Your business or division may have additional limits and guidance you should follow. In principle, there is nothing wrong with genuine relationship-building but ask yourself, "Is this excessive? How might this be seen? Could this impact the decisions of the person I'm giving the gift or hospitality to?" If you are struggling to justify it, it's probably not okay.

### WE ALWAYS:

- Ensure all gifts and hospitality given and received are recorded on a register or comply with financial limits or approval requirements
- Check with legal or compliance before offering any kind of gift or hospitality to public officials

- Check before offering customers any kind of gift or invitation – many have rules requiring them to report and/or refuse such things.

### WE NEVER:

- Offer or accept gifts or hospitality, if we think they might impair objective judgement, improperly influence a decision or create a sense of obligation, or if there's a risk they could be misconstrued or misinterpreted by others
- Solicit gifts or hospitality from suppliers or potential suppliers
- Offer or accept gifts of cash or cash equivalent, other than to participants in accordance with issued company guidelines (e.g. vouchers).

DOING  
BUSINESS  
ETHICALLY

## - WORKING WITH AGENTS / REPRESENTATIVES -

WE ONLY USE AGENTS OR OTHER THIRD PARTY REPRESENTATIVES IF WE HAVE TO  
AND IF THEY ARE KNOWN TO ACT TO STANDARDS CONSISTENT WITH OUR CODE

### WHAT WE MEAN:

The help, advice and local knowledge of agents and other consultants or contractors can sometimes be essential. However, they must operate at all times in accordance with our standards, particularly in relation to bribery and corruption. If you are retaining the services of such a third party, it is up to you to make sure that they clearly understand and formally agree to this.

It is also your responsibility to continue to confirm their behaviour remains compliant. So make sure they are known to act with integrity, and watch out for red flags. Ignorance of what an agent is doing in our name or for our benefit is no excuse.

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DOING  
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## - WORKING WITH AGENTS / REPRESENTATIVES -

WE ONLY USE AGENTS OR OTHER THIRD PARTY REPRESENTATIVES IF NECESSARY  
AND IF THEY ARE KNOWN TO ACT TO STANDARDS CONSISTENT WITH OUR CODE

### WE ALWAYS:

- Obtain corporate head office approval when retaining the services of an agent or other third party representative who can act on our behalf
- Check an agent's experience, background and reputation
- Make sure we understand what these types of third parties will actually do in return for the money we pay them
- Make sure any money we pay can be properly accounted for.

### WE NEVER:

- Permit anyone to offer or pay bribes or make facilitation payments on our behalf, or do anything else we would not be permitted to do ourselves
- Enter into an agreement that does not have a clear and proper commercial rationale
- Pay any money to an agent unless we know exactly what the payment is for
- Engage agents without a binding signed agreement setting out precisely what the agent will do for us.



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DOING  
BUSINESS  
ETHICALLY

## - CONFLICTS OF INTEREST -

PERSONAL INTERESTS SHOULD NOT CONFLICT OR EVEN  
APPEAR TO CONFLICT WITH INGEUS' BEST INTERESTS

### WHAT WE MEAN:

We should avoid situations that can give rise to a conflict between our own personal interests and those of the company. However, these situations can sometimes arise before we realise or an organisation that previously was not a competitor may become one (e.g. because it is acquired, or because Ingeus moves into a new service line). As soon as we realise there's a potential conflict, we must disclose it in accordance with our policies and seek approval or guidance. If in doubt, consult your legal or compliance contact.

### WORKING OUTSIDE INGEUS:

In general, staff may not be employed outside Ingeus. You may serve as an officer or a member of the board of directors of another business only with prior approval of your manager.

Approval will usually be given for service as a director or trustee of a not-for-profit organisation unless it is a potential supplier, customer or competitor of Ingeus. You should get approval to retain any associated fee paid to you. If in doubt, ask your HR or legal contact.

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DOING  
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ETHICALLY

## - CONFLICTS OF INTEREST -

PERSONAL INTERESTS SHOULD NOT CONFLICT OR EVEN  
APPEAR TO CONFLICT WITH INGEUS' BEST INTERESTS

### WE NEVER:

- Use our position, contacts or any knowledge gained at Ingeus for personal gain, or to benefit family or friends
- Pay a third party more than a contractually agreed, market-based fee for goods or services
- Accept gifts or hospitality that could impair our judgement or independence, or be open to misinterpretation
- Do anything that might create the impression that customers or suppliers have a contact in Ingeus who can exert influence on their behalf.

### WE ALWAYS TAKE GREAT CARE WITH:

- Contracts between Ingeus and a family member or a friend, or a company or business they own. In these circumstances we must notify our manager in writing and we should keep out of the decision making process
- Personal investments or business interests (or of family members). We must think how they could affect our decision-making responsibilities, or conflict with the interests of the company.

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DOING  
BUSINESS  
ETHICALLY





# - ANTI-COMPETITIVE CONDUCT -

WE ONLY SEEK COMPETITIVE ADVANTAGE  
THROUGH FAIR AND LAWFUL MEANS

## WHAT WE MEAN:

We comply with competition (also known as anti-trust) laws wherever we do business, because we believe in a marketplace that is fair, open and honest. Just because our competitors, suppliers or others may be doing something anti-competitive, doesn't mean we can join them – even if it means we lose business. Losing our integrity would be far worse.

Violations of such laws can mean individuals facing prison and very large fines being levied against the company. A breach of European competition law can result in fines of up to 10% of the whole Providence group's global revenue.



## WE ALWAYS:

- Take great care dealing with competitors, as any kind of agreement with them can raise competition concerns. An agreement does not have to be in writing it can be an informal understanding about how to behave
- Report any suspicions or allegations of possible anti-competitive behaviour to the legal team
- Tell our legal contact immediately if we receive confidential information we should not have obtained (for example, if a person accidentally sends us a competitor's information).

## WE AVOID:

- Exchanging sensitive information with competitors (for example, about prices, tenders, or costs). If in doubt, check first.

DOING  
BUSINESS  
ETHICALLY

## - ANTI-COMPETITIVE CONDUCT -

### RULES AT A GLANCE

THE FOLLOWING MATTERS ARE ALL ILLEGAL AND CAN SUBJECT THE COMPANY, OR YOU PERSONALLY, TO LARGE FINES AND JAIL TIME:

#### BID RIGGING

Sharing information or colluding with others about live bids or tenders.

#### PRICE FIXING

Arrangements between competitors to fix prices, discounts, rebates or even other terms of contracts.

#### MARKET SHARING

Agreements between competitors to share geographic markets, or to stay out of particular markets or away from particular customers.

#### ABUSE OF DOMINANCE

Abusing a dominant or monopoly position to keep out competitors or exploit customers or third parties.

#### COLLECTIVE BOYCOTTS

Agreements with competitors to avoid or boycott certain sub-contractors or suppliers.

The above list is not exhaustive and can vary between countries. Any time you are in contact with a competitor, if you are unsure about what you can and can't discuss, consult your Ingeus legal or compliance contact.

DOING  
BUSINESS  
ETHICALLY

## - SANCTION / IMPORT CONTROLS -

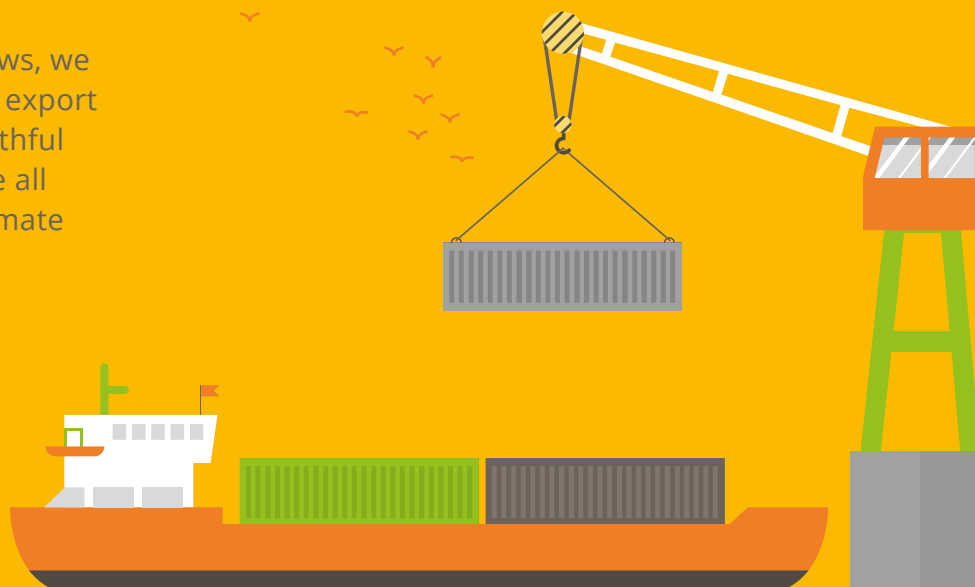
WE COMPLY WITH ALL RECOGNISED BOYCOTTS AND SANCTIONS, AND ALL LEGAL REQUIREMENTS FOR THE PROPER IMPORT AND EXPORT OF GOODS, TECHNOLOGY AND OTHER SERVICES

### WHAT WE MEAN:

Ingeus complies with all trade regulations and restrictions imposed by recognised national and international authorities. Certain countries pass boycott laws which are not recognised by international organisations and complying with these can give rise to legal issues, particularly in the United States. If you are in any doubt, consult the legal team.

In addition to complying with all relevant local laws, we must obtain all necessary licences to import and export goods and other items, and provide accurate truthful information to customs authorities. We must use all reasonable efforts to ensure that our goods' ultimate destination and purpose are as we intend.

DOING  
BUSINESS  
ETHICALLY



# HOW WE ENGAGE WITH THE WORLD OUTSIDE INGEUS

- WE ENSURE THAT OUR DEALINGS WITH SUPPLIERS, CUSTOMERS, GOVERNMENTS, REGULATORS AND OTHERS ARE FAIR AND TRANSPARENT
- WE SUPPORT CHARITIES AND ARE COMMITTED TO PROVIDE VOLUNTEERING OPPORTUNITIES FOR OUR STAFF
- WE DO NOT ACTIVELY SUPPORT ANY POLITICAL PARTY AND ENSURE ANY LOBBYING IS APPROPRIATE AND COMPLIANT WITH LAWS
- WE CARE ABOUT THE ENVIRONMENT AND WANT TO PROTECT IT
- WE ARE PRESENT IN MANY COMMUNITIES, AND WE WANT TO CONTRIBUTE POSITIVELY TO THEM



HOW WE ENGAGE  
WITH THE WORLD  
OUTSIDE INGEUS

## - WORKING WITH STAKEHOLDERS -

WE TREAT OUR EXTERNAL STAKEHOLDERS AND THEIR STAFF WITH INTEGRITY AND RESPECT

### WHAT WE MEAN:

We wish to be known as the partner of choice when we work with customers and members of our supply chain. Therefore, they can expect from us honesty, openness, professionalism and respect. If we display these characteristics to all stakeholders we encounter, we will continue to develop and maintain positive relationships wherever we work in the world.

IN OUR INTERACTIONS WITH OUR CUSTOMERS, SUPPLIERS AND THE WIDER COMMUNITY, WE ARE COMMITTED TO:

- Collaborating appropriately to ensure our services meet customer needs
- Meeting our obligations of responsibility or trust fully and willingly
- Keeping our promises
- Considering the impact of our decisions on stakeholders
- Seeking to resolve conflict or disputes early, with a sense of fairness
- Communicating truthfully, clearly and regularly
- Taking pride in the excellence of our delivery.
- Taking on work for customers where we are capable and can add real value
- Developing and sustaining strong, constructive and long-lasting relationships
- Selecting and rewarding partners based on objective processes, clear expectations of what is required, and demonstrated competence for the job



HOW WE ENGAGE WITH THE WORLD OUTSIDE INGEUS

## - ENGAGEMENT WITH CHARITIES -

WE ACTIVELY SUPPORT AND SPONSOR CHARITIES  
AND OTHER NON-PROFIT ORGANISATIONS

### WHAT WE MEAN:

As an organisation we want to have a positive and beneficial effect on the community around us, so Ingeus actively encourages staff to participate in charitable activities. Through our volunteering programmes, we encourage our employees to devote time to good causes during working hours. But, we need to make sure these charities are bona fide, and that their purposes are in accordance with Ingeus' values.

### WE ALWAYS:

- Get approval from our management team before donating in the company's name to a particular charity; it needs to be an appropriate one
- Make sure we don't offer donations as rewards for obtaining business or some other improper advantage
- Watch out for potential conflicts of interest.

### WE NEVER:

- Make a contribution to a charity unless we are sure the charity is bona fide
- Use charitable donations as a substitute for political payments
- Use company time or resources without permission.

### YOUR RIGHTS AS AN INDIVIDUAL:

You have every right to make personal donations and participate in charitable activities for any causes you believe in. You just need to make it clear that you are acting in a personal capacity.



HOW WE ENGAGE  
WITH THE WORLD  
OUTSIDE INGEUS

## - LOBBYING / POLITICAL ACTIVITY -

ANY POLITICAL ACTIVITY WE UNDERTAKE MUST BE LAWFUL AND ETHICAL.  
AS A COMPANY WE DO NOT PARTICIPATE DIRECTLY IN PARTY POLITICAL ACTIVITIES

### WHAT WE MEAN:

No one at Ingeus should make any political donations or contributions on behalf of the company without approval from the CEO. Any permitted political contribution should not be such that it appears excessive or inappropriate.

Lobbying and government relations laws are complex and differ between jurisdictions. Whenever and wherever we act on behalf of Ingeus we must take great care in what we say, do or support in the public or political domain.

### WE ALWAYS:

- Make sure our facts are correct and we have the appropriate approvals when talking with governments and public bodies
- Make sure all our interactions with public officials comply with our code.

### WE NEVER:

- Engage in any public policy activity on behalf of Ingeus unless expressly authorised to do so.

### YOUR RIGHT TO YOUR POLITICAL VIEW:

Everyone who works for us has the right to participate in politics in a personal capacity and to pay political contributions out of their own pocket, so long as this does not lead them into a conflict of interest.

However, you must never appear to represent the company or its views when engaging in personal political activities, unless specifically authorised by the company.



HOW WE ENGAGE  
WITH THE WORLD  
OUTSIDE INGEUS

## - ENVIRONMENTAL COMMITMENTS -

WE CARE ABOUT THE NATURAL WORLD AND RECOGNISE OUR RESPONSIBILITY TO WORK WITHIN ENVIRONMENTAL LIMITS

### WHAT WE MEAN:

With an extensive office network over multiple countries, our environmental footprint is large.

We do what we can to align being a profitable company with respect for our communities and the requirement to live within environmental limits. We do more than merely complying with local laws or minimum standards. Each one of us has a role to play in seeking out opportunities to improve our environment and the way we operate.



### OUR COMMITMENTS:

- We are committed to continuous improvement of our environmental performance and results. We will review these on a regular basis
- We will continue to monitor and reduce our impact on the environment in relation to our carbon emissions and waste disposal, and where possible offset our impacts
- We will encourage and support new and innovative ideas to improve and strengthen our environmental commitments
- We will proactively engage with local and national requirements for strengthening our environmental commitments and sharing good practice with our business partners and supply chain.

HOW WE ENGAGE  
WITH THE WORLD  
OUTSIDE INGEUS



## - COMMITMENT TO THE COMMUNITY -

INGEUS CONTRIBUTES POSITIVELY TO COMMUNITIES WHEREVER WE WORK THROUGH THE SERVICES WE PROVIDE AND THE LIVES WE CHANGE

### WHAT WE MEAN:

We seek to understand the impact we can have on local people and their environment. We listen, we care about people's concerns, and we adapt our services so that they are appropriate for the local community. Where possible, we seek to employ people who come from local communities and try and ensure that as an organisation we can have a positive impact on the life chances of those we serve.


### OUR COMMITMENTS:

- We will respect the traditions, cultures and laws of the countries in which we operate
- We will take into account the concerns of the wider community, including both national and local interests
- We will listen to the concerns of local communities and wherever we can we will act to mitigate them to the very best of our powers
- We will seek to employ local people on our contracts wherever possible.

HOW WE ENGAGE  
WITH THE WORLD  
OUTSIDE INGEUS



# OUR ASSETS, INFORMATION AND FINANCIAL INTEGRITY

- 
- WE DO NOT MISUSE COMPANY ASSETS OR RESOURCES
  - WE TREAT THE COMPANY'S PROPERTY WITH CARE AND RESPECT
  - WE USE COMPANY COMPUTER SYSTEMS APPROPRIATELY
  - WE KEEP CONFIDENTIAL INFORMATION SAFE AND DO NOT MISUSE IT
    - WE MAKE SURE OUR FINANCIAL RECORDS AND DISCLOSURES ARE COMPLETE AND ACCURATE
    - WE ENSURE OUR EXTERNAL COMMUNICATIONS ARE TIMELY AND INFORMATIVE
  - WE RESPECT AND PROTECT PERSONAL INFORMATION.

OUR ASSETS,  
INFORMATION AND  
FINANCIAL INTEGRITY

## - USE / MISUSE / DAMAGE OF COMPANY PROPERTY -

WE TREAT THE COMPANY'S RESOURCES WITH CARE AND RESPECT AND DO NOT USE THEM FOR ANY IMPROPER PURPOSE

### WHAT WE MEAN:

We always make the best use of the company's property. We keep it safe, treat it with respect and don't use it for own personal gain or improper purpose. This includes the company's information and its computer systems.

### WE ALWAYS:

- Take great care when spending the company's money
- Consider carefully before making financial commitments
- Operate within our delegations
- Protect confidential information and company computer systems.

### WE NEVER:

- Inaccurately record or abuse expense systems, or claim for things not properly incurred when on company business
- Use company property and resources for non-work related activities except where permitted by our policies.



OUR ASSETS,  
INFORMATION AND  
FINANCIAL INTEGRITY

## - APPROPRIATE USE OF I.T. SYSTEMS -

WE FOLLOW ALL OUR INFORMATION SECURITY POLICIES AND  
WE NEVER USE WORK SYSTEMS INAPPROPRIATELY

### WHAT WE MEAN:

Our company computer systems and the information they contain are valuable assets which must not be used for any improper purpose, or in any way that might affect their operation or integrity.

Any information stored or communicated on company computer systems is presumed to be company property. Subject to local law requirements, the company reserves the right to monitor our emails and internet usage, whether work-related or personal.

### WE ALWAYS:

- Follow all information security and acceptable use policies when using company computer systems for work-related or personal use (including on all social media sites)
- Take proper precautions to protect company computer systems against loss, damage or theft
- Immediately report where we are concerned that the security of our systems may be compromised.

### WE NEVER:

- Use company computer systems to access or distribute material that is illegal or offensive
- Knowingly allow our IT systems to be compromised.

OUR ASSETS,  
INFORMATION AND  
FINANCIAL INTEGRITY



## - DATA PRIVACY -

WE RESPECT AND PROTECT EVERYONE'S RIGHTS TO PRIVACY  
AND COMPLY WITH DATA PROTECTION AND PRIVACY LAWS

### WHAT WE MEAN:

Ingeus processes large amounts of sensitive personal information about our participants, staff, partners and stakeholders. At Ingeus, we only collect, retain and use personal information required for our legitimate interests, or as permitted by data protection laws and our customer contracts, in accordance with our policies.

We take particular care with sensitive personal information, such as medical information, and we work to ensure appropriate standards of data protection are in place across all our businesses worldwide. If you're in any doubt about any aspect of this, always seek advice and approval from your data protection officer or another data protection and privacy expert.

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OUR ASSETS,  
INFORMATION AND  
FINANCIAL INTEGRITY

## - DATA PRIVACY -

WE RESPECT AND PROTECT EVERYONE'S RIGHTS TO PRIVACY  
AND COMPLY WITH DATA PROTECTION AND PRIVACY LAWS

### WE ALWAYS:

- Protect all personal information and keep it confidential and secure
- Use it only in ways individuals would reasonably expect, and let them know what we intend to use it for and the people we may share it with
- Make sure it's only shared with people who have a legitimate need to know, or with the consent of those whose information we hold
- Promptly report any perceived threat or known/suspected loss of personal information
- Understand and comply with any additional customer obligations with respect to personal information.

### WE NEVER:

- Process data unlawfully, e.g. checking references without consent, sharing data without a legal basis etc
- Transfer personal information outside its country of origin or give other markets access to it without ensuring that the transfer is permitted
- Share more than the minimum necessary to achieve our purpose.

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OUR ASSETS,  
INFORMATION AND  
FINANCIAL INTEGRITY

## - INSIDER DEALING -

INSIDE INFORMATION MUST NOT BE USED FOR INSIDER TRADING, FOR OUR OWN OR ANYONE ELSE'S BENEFIT

### WHAT WE MEAN:

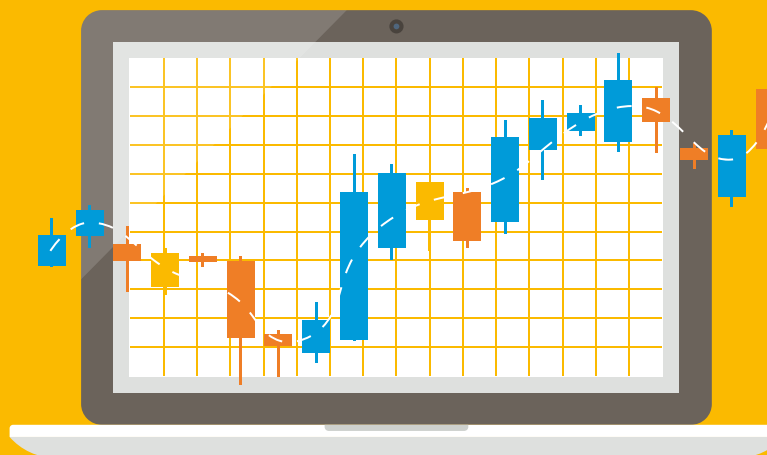
Providence Service Corporation, the parent company of the Ingeus Group, is a public company listed on the NASDAQ Stock Exchange. It is a serious criminal offence to buy or sell Providence stocks, shares or other securities, or those of any other company, on the basis of inside information.

It makes no difference whether you do it yourself or get someone else to do so, or whether it's for your own or anyone else's benefit.

Employees with access to potential inside information about Providence are placed upon a list of "insiders" and may not deal in Providence securities, except when advised by the Providence General Counsel.

### WE NEVER:

- Act on or disclose sensitive information without first getting approval to do so
- Deal in stocks or shares of Providence or any other company if we know something which is price-sensitive.



OUR ASSETS,  
INFORMATION AND  
FINANCIAL INTEGRITY

## - COMPANY COMMUNICATIONS -

WE DISCLOSE OR COMMUNICATE INFORMATION ABOUT THE COMPANY IN A TIMELY AND ACCURATE WAY, AND WE SEEK TO INFORM AND NOT MISLEAD

### WHAT WE MEAN:

How we talk about ourselves plays a huge part in how we are perceived as a company. We always communicate with integrity, and work with our shareholder to make accurate company disclosures so as not to mislead the market.

Sometimes it's possible to find yourself unintentionally acting as a spokesperson. You should never communicate on behalf of Ingeus if you aren't authorised to do so. Remember – your emails can easily become public information.

### WE ALWAYS:

- Ensure all company communications and disclosures have received prior internal approval, no matter what the medium. If in doubt, consult our communications team
- Take particular care about what we say at meetings or other public events

- Watch out for situations in which we may be considered to be speaking on behalf of Ingeus
- Take care not to betray the company's interests when using social networking websites, blogs, chat-rooms and other electronic communications.

### WE NEVER:

- Respond to the media or other external enquiries without express permission
- Express personal views in a way that might lead them to be interpreted as the company's views
- Say or write things that may damage Ingeus' reputation or relationship with customers or participants.

OUR ASSETS,  
INFORMATION AND  
FINANCIAL INTEGRITY



## - INFORMATION MANAGEMENT -

WE KEEP CONFIDENTIAL INFORMATION SAFE AND  
MAKE SURE IT NEVER GETS INTO THE WRONG HANDS

### WHAT WE MEAN:

Any improper disclosure or misuse of confidential information about Ingeus can have a huge impact on us. We should only share confidential information internally on a need to know basis, and disclose it to others where we have a confidentiality agreement in place and a valid commercial reason for doing so.

Confidential information belonging to customers, Ingeus employees or other third parties must be respected and protected in the same way, or in accordance with their additional requirements.

Ingeus has a document retention policy and we should follow it to ensure that information is stored only for so long as is necessary. We should be careful never to destroy information that is the subject of a litigation hold – in other words, information that might be necessary in proceedings or pending litigation.

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OUR ASSETS,  
INFORMATION AND  
FINANCIAL INTEGRITY

## - INFORMATION MANAGEMENT -

WE KEEP CONFIDENTIAL INFORMATION SAFE AND  
MAKE SURE IT NEVER GETS INTO THE WRONG HANDS

### WE ALWAYS:

- Report any information we obtain mistakenly or inappropriately from others that we think may be commercially sensitive
- Ask our legal or compliance contact if we have any doubts about use or disclosure of information
- Make sure customers, suppliers and other third parties protect our confidential information
- Follow our information security policies with respect to all company information
- Follow the Ingeus document retention policy.

### WE NEVER:

- Leave sensitive information lying around or unsecured
- Divulge confidential information we have from previous employers unless permitted to do so
- Exchange confidential information using insecure/unapproved methods of technology
- Discuss confidential information in public places where we can be overheard
- Destroy information that is the subject of any proceedings or threatened litigation.

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OUR ASSETS,  
INFORMATION AND  
FINANCIAL INTEGRITY



## - KEEPING ACCURATE FINANCIAL RECORDS -

WE MUST ALL ENSURE OUR FINANCIAL AND OTHER REPORTS AND RECORDS ARE COMPLETE AND ACCURATE

### WHAT WE MEAN:

Our books, records and financial reporting should accurately reflect and represent the true state of our business. It is a serious offence to falsify or tamper with the books, or fail to properly account for an activity.

Anyone involved in preparing financial accounts of an Ingeus company must make sure that all laws, procedures and Ingeus policies are followed in preparation of the company books. Even if those books are accurate when created, if we become aware of anything that changes that accuracy later, we must immediately report it.

### WE ALWAYS:

- Maintain and present financial records in accordance with the laws of each country we operate in
- Comply with the group's system of internal financial and IT controls

- Process transactions in accordance with delegated authorities, or specific approvals that have been granted
- Record transactions accurately in the right period, supported by appropriate evidence
- Comply with Providence's US financial accounting and reporting requirements.

### WE NEVER:

- Record things in the wrong place or way
- Fail to record any transaction or expenditure, or record it in an ambiguous or misleading way.

OUR ASSETS,  
INFORMATION AND  
FINANCIAL INTEGRITY



# - GLOSSARY OF TERMS -

## EQUALITY, DIVERSITY AND INCLUSION

Discrimination means treating a certain person or group differently based on factors such as age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation.

## BULLYING AND HARASSMENT

Harassment and bullying means any action or behaviour that any individual or group finds unwelcome, humiliating, intimidating, threatening, violent, hostile or discriminatory.

Employees should be particularly sensitive to actions that may be acceptable in one culture, but are not in another.

## HUMAN RIGHTS

Human rights are the fundamental rights and freedoms which all humans should enjoy. These include the right to life, liberty and security; equal rights of men and women; the right to protection under the law and against discrimination, slavery, torture, or inhumane or degrading treatment, and freedom of speech, thought, conscience and religion.

## FRAUD

Fraud is when you deliberately try to deceive someone, act dishonestly or abuse your position to gain any kind of financial or other advantage. Fraud can happen to Ingeus, or Ingeus employees can defraud other companies or individuals.

Fraud is a criminal offence in most countries. In some countries, you can be prosecuted just for being careless or turning a blind eye to it. Even failing to speak up to clarify a misunderstanding can be considered deceptive.

## BRIBERY AND CORRUPTION

Bribery means promising, giving or receiving an unearned financial or other advantage to influence someone's behaviour. One common form of bribery is a kickback – an unearned reward following favourable treatment. Both are corrupt. Whether they are provided to or received from public officials or private individuals, bribes are against the law and against our code.

Corruption means dishonest (or unlawful) activity where a person abuses his position of trust in order to achieve personal gain or advantage for himself or another person. It can involve bribery, extortion, fraud, deception, collusion, cartels, abuse of power, embezzlement and/or money laundering.

# - GLOSSARY OF TERMS -

## FACILITATION PAYMENTS

Facilitation payments are usually small payments made to public officials in order to speed up or facilitate actions the officials are already duty-bound to perform – this is why they are often called grease payments. The sums involved are usually small, and often they are regarded by locals as just the way things are done. However, these payments are illegal in most countries in which we operate, including the UK.

## GIFTS AND HOSPITALITY

Gifts and hospitality includes invitations to social functions, sporting events, meals and entertainment, gifts of low value, small or customary tokens of appreciation.

## WORKING WITH AGENTS / REPRESENTATIVES

Sometimes where it would be uneconomical for us to establish an office, or where we have limited experience, we may hire an agent or third party to represent us. They may assist in discussions with governments or other key stakeholders, or may advise us on the particular market in question. They may be looking for suitable partners for us or for new business opportunities to consider.

## CONFLICTS OF INTEREST

Conflicts of interest arise when we find ourselves in a position where two or more interests compete, potentially compromising our judgement or independence. Usually the conflict is about individuals benefiting at the expense of the company or another employer. Very often, perceptions of a conflict of interest can be just as damaging as an actual conflict of interest.

## ANTI-COMPETITIVE CONDUCT

Competition and anti-trust laws prohibit a variety of business practices that restrict free and fair competition, such as bid rigging, price fixing or market sharing. Even sharing of sensitive commercial information with competitors can be against the law.

## SANCTION / IMPORT CONTROLS

Boycotts and sanctions are both forms of trade restriction. A boycott means a country refuses to do business with another and prohibits other countries from doing so. Sanctions (which include embargoes) seek either to limit or prevent trade with or inside specific countries, or with specific organisations.

# - GLOSSARY OF TERMS -

## OUR STAKEHOLDERS

Ingeus works and interacts with numerous external stakeholders. These include partners, suppliers, customers, sub-contractors, governments, regulators, the people they employ and the wider community.

When they deal with us, stakeholders are entitled to expect of us the same standards of conduct that we expect of our colleagues and others.

## LOBBYING / POLITICAL ACTIVITY

Political contributions and donations can include monetary and non-monetary benefits such as the use of offices, services, materials or employee time. Typically they support a governmental entity, or a political organisation, party or candidate.

## USE / MISUSE OF COMPANY PROPERTY

Company property and resources include physical assets like stock, computers, cash, vouchers, and other materials. They also include non-physical or intangible assets like information, intellectual property, the time and knowledge and experience of our employees, and the Ingeus brand itself.

## APPROPRIATE USE OF IT SYSTEMS

Company computer systems are information and communication technology, systems and equipment that are owned or used by Ingeus. These can include laptops, desktops, servers, telephones, mobile phones, USB or other portable memory sticks, handheld devices or other similar items.

## DATA PRIVACY

Data protection and privacy laws regulate the treatment of personal information. Wherever we hold and use personal information we must always comply with relevant data protection laws, while also complying with Ingeus' own standards and policies on protecting personal information, as well as those of our customers.

Personal information is anything which can identify a living person, which can include their name, a photo, social security numbers, and other relevant information including expressions of opinion about the person and statements of our intentions towards them.

Sensitive personal information includes information about racial or ethnic origin; political opinions; religious beliefs or other beliefs of a similar nature; trade union membership; physical or mental health or condition; sexual life, or the commission or alleged commission of any offences.

# - GLOSSARY OF TERMS -

## INSIDER DEALING

Inside information means information which is not available publicly and could affect someone's decision to buy or sell stocks or shares is generally known as inside information.

Insider trading means trading in securities such as stocks and shares while you are in possession of inside information about the relevant company. This may be information about Ingeus and Providence, or information about a company we are doing business with.

## COMPANY COMMUNICATIONS

Company communications are any external messages from us, or anyone we authorise on our behalf, about Ingeus. They include press releases, communications with media or journalists, promotional materials and advertisements, and other public statements.

## INFORMATION MANAGEMENT

Confidential information refers to any and all confidential and/or proprietary information or material belonging to or in the possession of Ingeus. It may be oral, visual, written, or in any other form.