

# BUSINESS ETHICS POLICY

## STATEMENT FROM CHIEF EXECUTIVE OFFICER – JIM MARSH

Our business ethics policy explains how we do business throughout the world, it is there to guide us as we continue to develop, and to let people know what to expect from us, wherever they find us.

We aim to be honest, open and fair in all our dealings; to respect the human rights of our colleagues and the communities in which we operate; and we are determined that the very highest standards of business ethics should underpin our relationships with all our key stakeholders – shareholders, colleagues, customers, business partners and suppliers.

Our business ethics policy also addresses our relationships with governments, regulators, communities and the protection of the environment.

In this document we set out the guiding principles behind the more detailed standards, policies and processes that drive our day-to-day operations and underpin our working relationships. It's a framework for understanding our corporate and personal responsibilities and underpins our mission and company values.

On behalf of the Board I would like to assure you that any breach of these standards will be investigated responsibly. No one will be reprimanded in any way for having raised a matter in good faith. Neither will the company disclose your identity without prior permission unless disclosure is unavoidable in any legal investigation.

I hope you will make this document live in the best way possible – by bringing our values to life in all your dealings with all the communities we serve.



**Jim Marsh**  
Chief Executive Officer

## OUR COLLEAGUES

**We're obsessed about our people. We respect the dignity of the individual and support the Universal Declaration of Human Rights and the ILO Core Conventions. We're committed to creating a working environment where there is mutual trust, integrity and respect, where everyone is both personally accountable for their actions and responsible for our business performance and reputation**

### HEALTH & SAFETY

We provide our colleagues with safe and healthy working conditions and practices. We have a fully implemented health and safety management system that is maintained and complies with legal standards. We monitor and report our Health & Safety performance. For more information, visit our [Health, Safety and Environment Site](#)

### DIVERSITY

Colleagues are expected to embrace our culture of diversity and to treat others with respect. We aim to recruit, retain and develop talent that represents the local cultures in which we do business. We aim to create a high performance environment that thrives on diversity to the benefit of all colleagues, customers and shareholders. For more information, visit our [Diversity site](#).

### EQUAL OPPORTUNITIES

Cable&Wireless Worldwide is committed to providing equal opportunities and will not tolerate discrimination of any kind. We recruit, retain and develop colleagues based on suitability of role and the opportunity for personal and professional growth.

### CONFLICTS OF INTEREST

All Cable&Wireless Worldwide colleagues must avoid personal activities and financial interests that could conflict, or be perceived to conflict, their responsibilities to the Company. A [Conflicts of Interest Register](#) is maintained for the benefit of colleagues. To declare a conflict of interest, colleague should contact [Good Governance](#).

### REPRESENTATION

We recognise the need for communication and consultation with colleagues. An [Employee Consultation Forum](#) is elected to enable open dialogue between colleagues and the management team.

### **USE OF COMPANY ASSETS**

Cable&Wireless Worldwide owns and has entrusted to it, billions of pounds worth of property including physical property, records and data, intangible and intellectual property. Responsible stewardship of these assets is expected from all colleagues. Theft or misappropriation of the company's assets or the property of others will not be tolerated.

### **DRUG AND ALCOHOL POLICY**

Cable&Wireless Worldwide does not tolerate alcohol and/or drug abuse. We provide support and guidance for managers in dealing with any problems and also for colleagues who may have a problem. Our policy retains the right to ask colleagues to undergo testing. For more information, visit our [Drug and Alcohol site](#)

### **COMPLAINTS OF HARASSMENT OR BULLYING**

Cable&Wireless Worldwide does not tolerate harassment and bullying, which are considered to be extremely serious matters. Any colleague who is found to have carried out such acts will be subject to action under the [disciplinary process](#)

### **COLLEAGUE PRIVACY POLICY**

Cable&Wireless Worldwide respects the privacy of all colleagues and takes its responsibility regarding the security of Personal Data very seriously. Colleague's Personal Data is used in a way that is fair and lawful. We will not seek or hold Personal Data which is excessive for its purpose. Reasonable measures are taken to ensure all colleagues' Personal Data is accurate and up to date. We have implemented and maintained appropriate technical and organisational security measures to prevent unauthorised or unlawful disclosure of / or access to colleagues' Personal Data. For more information, please visit our [Colleague Privacy Policy](#)

### **SPEAKING UP**

Cable&Wireless Worldwide is committed to creating and maintaining positive working relationships. It is essential that colleagues raise concerns quickly and in a reasonable and responsible way and that they are able to do so without fear of victimisation or reprisal. We offer an [Ethics Hotline](#) to support all colleagues.

## **OUR CUSTOMERS**

**We're a customer service business in the technology sector. Our customers are at the heart of everything we do and we're determined to develop mutually beneficial relationships based on trust and respect.**

### **BUSINESS INTEGRITY**

We do not give or receive, directly or indirectly for business or financial gain, any financial inducement or improper advantage, or engage in any form of corruption, or exercise undue influence over any other colleague or third party. Cable&Wireless Worldwide does not enter into facilitation payments.

### **PROTECTION OF INFORMATION**

We value the trust our customers place in us and will safeguard the information provided to us to the same high standard as we do our own. For more information, visit our [Data Protection and Privacy site](#).

### **GIFTS AND HOSPITALITY**

No colleague may offer, give or receive any gift, payment, benefit or hospitality without complying with the appropriate Gifts and Hospitality Policy. A gift register is supplied to record gifts that are offered by suppliers and others. Email [Good Governance](#) to register your gift.

### **ACCURACY OF RECORDS**

We depend on the completeness, validity and accuracy of our records. We have a fully secure and managed Contracts Database which holds customer, supplier and secure internal information. Cable&Wireless Worldwide is ISO 9001 certified.

## **OUR SHAREHOLDERS**

**We commit to creating sustainable, long term value for our shareholders. All shareholders are communicated to openly and transparently within the bounds of commercial confidentiality and regulatory limits.**

### **BUSINESS CONDUCT**

We recognise the growing interest in the way we conduct our business. Our shareholders and other stakeholders are entitled to know our values and standards and can expect us to live up to them.

## **ENGAGEMENT**

We have an effective and transparent engagement approach with our shareholders, including independently verified reporting arrangements.

## **COMPLIANCE**

We comply with the laws and regulations of the countries in which we operate, including the listing obligations and governance codes of the Stock Exchange and are therefore required to comply with the rules and regulations of the UK Listing Authority (UKLA).

## **COMMUNICATIONS**

We ensure that all public announcements are accurate, complete, fair, timely, and understandable and comply with all applicable laws and regulations.

## **INSIDE INFORMATION**

Buying or selling shares (or encouraging others to do so) on the basis of information not publicly disclosed is unethical and prohibited and may amount to the criminal offence of insider dealing.

## **SHARE DEALING**

We maintain our Share Dealing Code and ensure that all relevant colleagues are made aware of their obligations to uphold it. The code provides a mechanism which will help to prevent dealing in listed securities by an individual which is prompted by knowledge of the affairs of a company which is not public.

# **OUR SUPPLIERS AND BUSINESS PARTNERS**

**We commit to creating sustainable, long term value for our shareholders. All shareholders are communicated to openly and transparently within the bounds of commercial confidentiality and regulatory limits.**

## **CONTRACTUAL OBLIGATIONS**

We take our contractual obligations seriously and ensure that we pay our suppliers according to our agreed contracts.

## **MAINTAINING OUR VALUES**

Where we operate in conjunction with business partners, we will endeavour to promote our values as well as demonstrate our commitment to upholding our ethics principles.

## **CONTRAVENTION OF OUR STANDARDS**

We expect to be made aware of any instance where a supplier or business partner has contravened our policy.

## **PROTECTION OF PROPERTY**

We commit to protect our property (including intellectual property) and respect the property of others with whom we do business.

## **GIFTS AND HOSPITALITY**

We do not accept gifts and /or hospitality from suppliers or other business parties which might be seen to be putting us under an obligation when making business decisions. Reasonable tokens and hospitality may be accepted. A gift register is supplied to record gifts. Email [Good Governance](#) to register your gift.

# **OUR RELATIONSHIPS WITH GOVERNMENTS, REGULATORS, COMMUNITIES AND SOCIETY**

**It is extremely important for us to maintain honest, transparent and ethical relationships with governments, their agencies and officials.**

## **PROTECTION OF OUR INTERESTS**

We promote and defend our business interests through co-operation with governments and other organisations, both directly and through bodies such as trade associations, in the development of proposed legislation and regulations that may affect our interests.

## **POLITICAL DONATIONS**

No gift or donation will be made to any political party.

## **COMPETITION**

We are committed to competing strongly yet fairly and complying with appropriate competition laws. We do not collude with our competitors to fix prices, rig bids or do other things which fall foul of competition laws.

## **ENGAGEMENT WITH THE COMMUNITY**

We work in partnership with several local, national and international charities to help address the social and environmental needs of the communities in which we operate.

### **THE ENVIRONMENT**

As part of our goal to develop a sustainable business, we aspire to make continuous improvements in the management of our environmental impact with emphasis on the need to reduce energy consumption, carbon emissions and waste production. For more information, visit our [Environment Policy](#).

### **BRIBES AND FACILITATION PAYMENTS**

We will not give or receive, directly or indirectly for business or financial gain, any financial inducement or improper advantage, or engage in any form of corruption. Cable&Wireless Worldwide does not enter into facilitation payments – it is a bribe by any other name. Under the UK Bribery Act 2010, it is a criminal offence to make such payments anywhere in the world.

## KEY CONTACTS

General Counsel:	Philip Davis
People Director:	Debbie Meech
Risk Director:	Neal Rankin
Employee Consultation Forum:	Richard Hale

## ETHICS HOTLINE

**Individuals reporting matters have the right to remain anonymous and will receive feedback on how the matter is being investigated.**

**Individuals reporting matters with genuine concern will be protected from reprisal, punishment or other detrimental actions.**

The Ethics Hotline telephone number is:

0151 326 2100 from the UK or  
+ 44 151 326 2100 outside of the UK.

Reverse charge calls to this number via an operator will be accepted

All ethical breaches that are reported to the [Ethics Hotline](#) or to a manager will be reported to the Cable&Wireless Worldwide Risk Director, [Neal Rankin](#) and will be investigated as appropriate.

The Audit Committee of the main Board will monitor the matters reported and the outcomes of all investigations.

**HISTORY OF CHANGES**

VERSION	ISSUE DATE	SUMMARY OF CHANGES
1	4 Oct 2010	New Policy (to replace code of Business Principles and Standards of Conduct policy)
2	15 Oct 201	Policy renamed Business Ethics