

# SABIO CODE OF CONDUCT

Sabio Group Policy



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# BEING A RESPONSIBLE BUSINESS

The success of Sabio Group depends upon us all behaving in a responsible way.

Being responsible means:

- Being a great employer
- Minimising our environmental impacts
- Making a positive contribution to our community
- Doing what is legally required in each country we operate
- Working in an ethical way

**In short, we need to ‘do the right thing’.**

When we work in this way we demonstrate to our colleagues, clients, suppliers and investors that we can be trusted which enables us to build strong and sustainable relationships. Whilst this document will not capture every possible scenario, it makes it clear:

- What our principles are,
- Where to find more information,
- Who can provide further advice; and
- How to escalate serious concerns about our business practices.

I would like to ask everyone to familiarise yourself with our Sabio Code of Conduct Policy and help us ensure we achieve the high standards required by our clients, investors and each other.

**Andy Roberts**  
CEO

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## OUR PRINCIPLES

Our Principles apply to all Sabio Group employees, temporary workers and contractors.

We recognise that we must conduct our business based on the rules and regulations established in the countries where we operate. In the event of a conflict between local law and these principles we will always opt for the highest demanding rule.

Our principles are the starting point. We encourage sharing of best practice across the group to help us continuously improve our approach and positive impact on society.

Everyone must stay alert to the importance of preventing and eliminating wrongdoing, illegal or unethical conduct at work and report anything of that nature that they become aware of.

## AWARENESS AND TRAINING

The intranet hosts a copy of this document and links to further resources, guidance and training to support responsible decision making.

All new starters will receive access to an electronic copy of this document when they join and will be asked to confirm their agreement with this policy and the principles.

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# RESPONSIBLE DECISION-MAKING STEPS

Our principles and policies may not cover every situation, therefore if you are faced with a situation you are not familiar with, please follow these steps:



## CHECK THE FACTS

- Do you have all the facts?
- Have I separate assumptions and opinions?
- Do I need any more facts?



## UNDERSTAND THE RULES

- What do our policies say?
- Do you know what the local laws and regulations are?
- What did we do in the past?



## APPLY THE PRINCIPLES

- What do our principles say?
- How would you feel if this decision appeared in newspaper?
- Are you doing the right thing?



## SEEK ADVICE

- Talk to your manager
- Speak to the People, Legal or IT department
- Get alternative perspectives



## RAISE CONCERNS

- Speak directly with the individual involved
- Escalate to your line manager
- If sufficiently serious formally report your concern (see next section)

# REPORTING SERIOUS CONCERNS / WHISTLEBLOWING



It is important that any fraud, misconduct or wrongdoing by Sabio Group employees is reported and properly dealt with.

Sabio therefore encourage all individuals to raise any concerns that they may have about the conduct of others in the business, or the way in which the business is run. For more information please visit our Whistleblowing policy on the intranet.

In some countries this is called whistleblowing. Whistleblowing is a law that protects employees who raise legitimate concerns about specific matters. These are called 'qualifying disclosure'. A qualifying disclosure is one made in the public interest by a person who has a reasonable belief that one of the below acts has been or is likely to be committed:

- **A criminal offence**
- **A miscarriage of justice**
- **An act creating risk to health and safety**
- **An act causing damage to the environment**
- **Any act of conduct that could be considered as discriminatory**
- **The company is breaking the law**
- **Someone is covering up wrongdoing**
- **A breach of any other legal obligation; or**
- **Concealment of any of the above.**



# WHISTLEBLOWING PROCESS

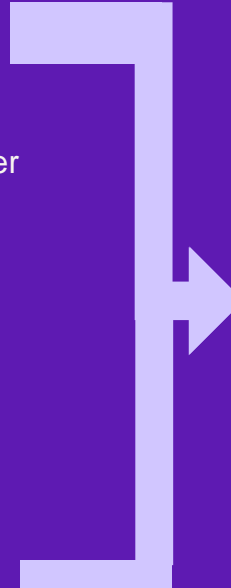
## Speak with your Line Manager

Or your line managers manager if the issues concerns them



## Line Manager seeks guidance

From the Chief People Officer in the first instance. If not appropriate an alternative Chief Officer in the business



## Investigation

An independent investigator will be assigned, and an investigation will be carried out

- If you have a concern or complaint relating to your employment terms or how you have been treated by the company, you should discuss this with a People Partner
- These matters may be dealt with via the Grievance Procedure.



## Feedback

On conclusion of any investigation, you will be told the outcome of the investigation and what the board has done or proposes to do.

If no action is to be taken, the reason for this will be explained

- If on conclusion you reasonably believe that the appropriate action has not been taken depending on your country laws you may have a right to report the matter to the proper authority.
- Whistleblowing legislation sets out the bodies to which **qualifying disclosures** may be made
- Please contact the people team for more information

## Email

People@sabiogroup.com

If you don't feel you can approach your manager or their manager



## Confidentiality

The reporter's identity will be treated with the strictest confidence and will not be disclosed without consent

# REPORTING SERIOUS CONCERNS / WHISTLEBLOWING



## NO RETALIATION

You are encouraged to raise concerns following the steps set out on the previous pages and in our Sabio Whistleblowing Policy. Retaliation will not be tolerated for raising a concern about our business practices. Retaliation can include being dismissed, demoted, intimidated, harassed, excluded or treated poorly as a result of raising a legitimate concern.

If you are not sure whether to raise a concern, we encourage you to discuss the issue with your Line Manager, Legal Team or People Partner.

## DEALING WITH BREACHES OF OUR PRINCIPLES

Failure to comply with this Sabio Code of Conduct Policy or the supporting policies, procedures and processes may result in disciplinary action, which could include dismissal.



# PRINCIPLE 1

## OUR VALUES

Know the Sabio Values, apply them and promote them

### HOW WE BEHAVE

#### TAKE OWNERSHIP

Assuming responsibility for the small things – and the big ones. Our people take accountability for their roles, actions and behaviours. They manage expectations well and see things through to completion.

*I act like an owner*

#### BE THERE

We work in a fast-paced, complex environment, often working remotely. Our commitment is to be present and mindful of interactions with others. We support each other through our willingness to help in the understanding that we win together.

*I'm there for my team*

#### CAMARADERIE

Our people work together towards shared goals, enjoy each other's company and have fun along the way. We recognise that diversity of talents, opinions and perspectives make teams stronger.

*We work, have fun and win together*

### HOW WE WIN

#### FOLLOW THE DATA

Data forms the building blocks of our decisions. It tells us whether we're succeeding or failing, where we can and should do more - or less. Whether it's NPS or analytics, data on diversity or sustainability, we find it, we follow it and act on it.

*I'll do the research; I am informed*

#### OWN AN OPINION

Our business relies on expertise, research and hard work because no two customers are the same. Opinions are our currency. We form them through knowledge and data, debate them, decide and commit, then act on them to generate value.

*I come prepared to share my point of view*

#### STAY AHEAD

The world changes quickly. We spend time analysing the market, mastering our craft and the technologies we work with. We perpetually look for ways to automate, optimize, flex and improve keeping our customers at the forefront of digital CX.

*We keep moving forward*

### WHAT WE BELIEVE

#### NO LIMITS

Our people are our business. There are no boundaries to greatness for us as individuals and as a team. We put people at the centre of everything we do and give everyone the opportunity to grow, learn and develop, to scale great heights.

*It's up to me how far I go*

#### CONTINUOUS LEARNING

Fulfilment comes from enjoying the work we do and having a path for progression. We believe in providing every opportunity for our people to continuously learn and develop throughout their whole career.

*I'm thirsty for knowledge*

#### BUILD SOCIAL VALUE

Our aim is to minimise our impact on the environment and support our customers in doing the same for the long-term future of the planet. We believe that the world must work for everyone, support diverse needs and views and deliver social justice and equality.

*We have commitments to society & the planet*

#### Who to speak to:

Intranet (Our values) | Line Manager | People Team - [people@sabiogroup.com](mailto:people@sabiogroup.com)

# PRINCIPLE 2

## HEALTH, SAFETY & WELLBEING



Look after your own health, safety and wellbeing, and encourage others to do the same

### MENTAL WELLBEING

The well-being of our colleagues is important to us, it can be impacted by many triggers both from in the workplace and in your personal life.

Sabio has trained Mental Health First Aiders around the globe, as a point of contact if you, or someone you are concerned about, are experiencing a mental health issue or emotional distress. They can give you initial support and signpost you to appropriate help if required.

We have also arranged for you to have access to a free telephone helpline service called Employee Assistance Programme (EAP). This provides confidential, practical and emotional support to help you cope with things such as emotional and physical support, legal advice...

### OFFICE SAFETY

If you work or visit the office familiarise yourself with the fire procedures and exit routes. Understand common office risks and hazards (e.g., slips and trips, safe lifting). Know how to get access to first aid.

### DRIVING

Ensure your car maintenance is up to date, follow local road rules. Avoid using mobile phones when driving. Do not drive under the influence of drugs or alcohol.

### PHYSICAL WELLBEING

Many of our roles require us to sit at a desk for long periods of time. Finding ways to get moving and keep active not only improves your physical health but can also have a positive impact on your mental wellbeing too.

### USING LAPTOPS & PCS (Display Screen Equipment)

You can mitigate many aches, pains and longer-term musculoskeletal issues by ensuring your desk is set up correctly. Also remember to have your eyes tested regularly. Sabio has launched a mandatory Display Screen Equipment training, that gives employees health and safety useful information and allows them to request additional equipment if needed, in order to ensure they have a proper workstation to work with.

### REPORTING

We need to know if you have had an accident or if there has been a near miss. We want to check you are ok and look at what we can do to avoid the accident happening in the future. We also ask that you help us to identify any safety concerns and improvements.

#### Where to find out more:

Intranet Page | MetaCompliance: Health & Safety Training | Mental Health First Aiders | EAP | Speak to your Line Manager or People Partner | Emergency Evacuation Plans |

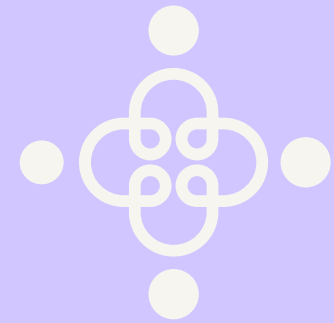
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# PRINCIPLE 3

## DIVERSITY, INCLUSION & BELONGING

Make others feel valued, included and able to be their authentic selves at work



Sabio Group are committed to fostering an inclusive and diverse culture that values many different perspectives, cultures and backgrounds. We want our colleagues to be themselves. We believe a diverse workforce makes for a richer and more enjoyable environment; therefore, we have several initiatives in place to ensure our recruitment processes are non-biased, and that we are educating our colleagues on topics such as this.

Challenging each other in a positive way to look at things from different perspectives helps us build a more successful company. Listening to one another and encouraging views that differ helps create an environment where people feel able to speak up.

Sabio are committed to providing equal opportunities to all current and prospective employees regardless of age, disability, sex, sexual orientation, pregnancy and maternity, race or ethnicity, religion or belief, gender identity, or marriage and civil partnership. We do not discriminate because of any other irrelevant factor and will build a culture that values meritocracy, openness, fairness and transparency.

Your views and feelings about working at Sabio are important for the Company. We encourage employees to support focus groups or internal communities. Once a year, we send an anonymous survey where you can **have your say** and help make Sabio an even better place to work.

We know there are things that happen in the workplace which may not feel great. For example, what one person takes as a joke, others may find inappropriate. We ask you to be sensitive of other perspectives. If you hear something that could be interpreted as inappropriate tell the individual and ask them to stop.

Sabio will not tolerate discrimination, victimisation, harassment or bullying.

### Where to find out more:

Intranet Page | Equality, Diversity & Inclusion Policy | Have your Say | Online Learning  
Speak to your Line Manager or People Partner

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# PRINCIPLE 4

## PROFESSIONAL CONDUCT & COMPETENCE

Take pride in your work



Everyone is required to perform their work according to the requirements of the role and should do so in a professional competent, careful and productive manner at all times. It is expected that you to act always with full integrity, honesty and fairness, to keep the highest standards of behaviour and to require others to do the same.

You are required to comply with Sabio policies, practices and procedures and if you are not sure what these are we need you to ask for guidance.

At least once a year you will have a Performance Development Review (PDR) conversation with your line manager. This is where you will discuss your personal and goals for the year and how your role support the achievement of the company strategy.

You will also have regular conversations related to your development. We expect you to have a Career Development Plan (CDP) which you will discuss with your line manger on a

regular basis. Part of this conversation will be to agree what support Sabio can provide to enable your career development.

If your role requires professional credentials or continued professional development, we need you to keep them up to date.

We ask that you do not work whilst under the influence of alcohol or illegal drugs.

If for any reason you cannot perform your role to the requirements expected you should discuss this with your line manager.

### Where to find out more:

PDR & CDP Intranet Page | Speak to your Line Manager or People Partner

## PRINCIPLE 5 ANTI SLAVERY

Have a zero-tolerance approach to slavery and human trafficking



We are committed to acting ethically and with integrity in our business dealings and relationships and are committed to preventing modern slavery in our own business and to helping prevent modern slavery in our supply chains.

**Where to find out more:**

Anti-Slavery Policy | Online Learning | Speak to the Legal Team or People Partner

## PRINCIPLE 6

# QUALITY AND ENVIRONMENTAL

Help us to reduce our environmental impact



We want our colleagues to feel proud of their workplace, proud of us living up to our commitments to society and to feel they're achieving great things. We believe that to provide a workplace that people are proud to work in, we must think about our broader place in society and the impact we have on our environment.

Our ambition is to be a leader in environmental sustainability in our sector. We are committed to producing an accurate baseline measure of our carbon footprint and actively seeking ways to systematically reduce this across our business.

**Where to find out more:**

Quality and Environment Policy | Speak to the Legal Team or People Partner

# PRINCIPLE 7

## SOCIAL RESPONSIBILITY

Give back to society and the local community



Sabio want our people to feel excited about their workplace, to get a buzz from working at Sabio and to feel they're achieving great things. Sabio believes that, in order to deliver this, we must think about our broader place in society and a purpose that goes beyond the day job.

We are measuring our impact on Social Value in partnership with the [Social Value Portal](#) and we're using this as a platform to focus our priorities on five different themes: employment, sustainable growth, local social value, environmental contributions, and innovation. We cover over 50 measures in the portal and want to use this data to improve our contributions to our local and global communities, for example, through actively encouraging our employees to use their volunteering days.

**Where to find out more:**

Volunteering Policy | Sabio Life

Speak to your Line Manager or People Partner

Sabio supports those who wish to do volunteer work within the community or for charitable institutions by providing 2 days paid leave a year to everyone once probation passed. The types of volunteer activity Sabio supports includes:

- Community care work
- Environmental work and conservation project
- Fundraising for community projects or charities

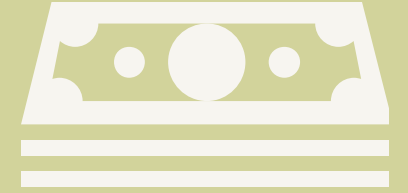
Sabio affiliates itself with charities at both a group and local level. Typically, charitable support activities are discussed in our Sabio Life forum and publicised across the group so those that wish to get involved can. Key support themes include:

- Mental health
- Environmental and conservation
- Support to international emergencies

# PRINCIPLE 8

## BRIBERY, GIFTS AND HOSPITALITY

Don't accept or offer a bribe



Bribery is offering, promising, giving or accepting any financial or other advantage, to induce the recipient or any other person to act improperly or to reward them for acting improperly.

An advantage includes money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value.

- You must not bribe or attempt to bribe anyone.
- You must not accept or allow another person to accept a bribe.
- If you are offered gifts or hospitality from a supplier, customer or anyone else doing company with us you should take advice from your manager.
- You may need to refuse the gift and document the receipt of the gift in our gifts and hospitality register.
- You are not allowed to give gifts or hospitality without the appropriate permission. If approved, it must be recorded in our gifts and hospitality register.

### Where to find out more:

Global Anti Bribery Policy | Gifts & Hospitality Policy | Speak to your Line Manager, Legal Team or People Partner



# PRINCIPLE 9

## CONFLICT OF INTEREST

Let us know of any conflicts of interest



There may be times when employed with us where a conflict of interests crops up which could damage your own or Sabio's reputation.

These conflicts could make it difficult for you to exercise independent judgement or could impact on your ability to dedicate the time to the demands of your role. For example:

- You are in a close relationship with someone at work (friend / partner)
- Outside activities grow and begin to conflict with work time

Where this is the case, you must inform your manager, who will discuss the situation with you and agree appropriate next steps.

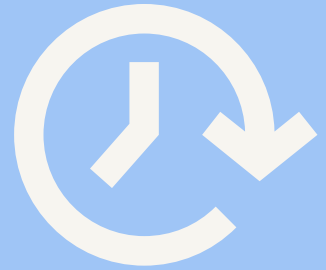
### **Where to find out more:**

Speak to your Line Manager, Legal Team or People Partner

# PRINCIPLE 10

## RECORDING OF TIME, COSTS AND FINANCIALS

Record time, costs and financials accurately



Its essential for our credibility and reputation that we honestly and accurately record and report financial and nonfinancial information.

Accurate and timely recording helps us to ensure that we:

- Can more accurately estimate the time and cost to deliver future work.
- Bill our customer accurately.
- Can plan future resource requirements.
- Meet our financial reporting obligations.

To support this, we use applications that give our teams a complete, customer-centric view and allow us to align our sales, services, and finance teams around a single customer record.

When claiming your expenses be mindful that they are reasonable and comply with the travel and expenses policy. Consider would you spend it if it were your own money?

### Where to find out more:

Group Travel & Expenses Policy | FinancialForce | Sales Force  
Speak to your Line Manager, Finance or People Partner

# PRINCIPLE 11

## CONFIDENTIALITY & INTELLECTUAL PROPERTY

Respect confidentiality & intellectual property



Sabio takes the protection of its confidential information and intellectual property very seriously. You will find yourself in possession of confidential and sensitive information as part of your role. For example:

- Details of customers
- Product and services information including price lists and contract terms.
- Technical information, code and algorithms
- Employee information

### Where to find out more:

Your contract of employment  
Speak to your Line Manager, Legal Team or People Partner

You must not discuss any company sensitive or confidential matter whatsoever with any outside organisation including the media.

You must also take care to protect respect internal confidentiality. Ensure confidential and sensitive information must be kept secure by:

- Using appropriate access restrictions and passwords
- Locking screens when not in use
- Minimising the use of hard copy documents and ensuring they are stored securely
- Appropriately classifying confidential documentation
- Using caution when using mobile phones or laptops in possible visibility of others – e.g., on public transport or in public areas

Sabio retain ownership of all intellectual property you create unless agreed otherwise in advance with our clients. In return, we must also respect the rights vested in our clients' intellectual property.

# PRINCIPLE 12

## IT ACCEPTABLE USE

Look after your IT equipment



Inappropriate use of our computer equipment and systems exposes Sabio to risks including virus attacks, compromise of network systems and services, and legal issues.

Our Global IT Acceptable Use Policy provides you with the rules of what is and is not acceptable use of our systems. Please ensure that you have read this policy and if in any doubt – ask for advice.

Please ensure you look after the equipment given to you to minimise wear and tear, accidental damage or theft.

If you plan to take or access Sabio devices when abroad depending on the duration and country, you may need to notify the Information Security team. The policy provides further details on this.

We do monitor internet and email access where there are valid reasons to do so.

Deliberate damage, excessive or unauthorised use equipment of software is classed as disciplinary matters and may be dealt with formally by the People Team if necessary.

### **Where to find out more:**

Global IT Acceptable Use Policy | IT Intranet Page | Speak to your Line Manager, Technical Services, Information Security Team or People Partner

# PRINCIPLE 13

## INTERNET & SOCIAL MEDIA

Be careful what you post on social media



Limited personal use of the internet and social media is permitted if it does not impact on your performance. Do not view or download illegal, pornographic, sexist, racist, extremist, offensive or any other material which may cause embarrassment to Sabio.

When you use social media (e.g., Facebook, Twitter, WhatsApp, LinkedIn, Instagram, TikTok) whether for personal use or authorised work purposes, we expect you to act responsibly and professionally.

Be mindful that your association with the company may be known to anyone at any time and this could reflect positively or negatively on the company. You must not damage the company, its interests, or its reputation whether directly or indirectly, in any way.

### Where to find out more:

Global IT Acceptable Use Policy | IT Intranet Page  
Speak to your Line Manager, Marketing Team or People Partner

- You must be mindful about anything that you post or share on the internet or social media.
- Do not share confidential information where you are not authorised.
- Do not breach copyright or other intellectual property rights.
- Do not breach any of the company's policies.
- Do not breach and laws or other applicable rules set out by regulatory bodies.
- Do not make any abusive, obscene, discriminatory, disparaging, defamatory or harassing comments.
- Be aware that any communication could be relied upon in court to the detriment of you or the company.

Certain individuals are authorised the company to use social media on behalf of the company. They must use it in line with the guidance from the Marketing team.

# PRINCIPLE 14

## INFORMATION SECURITY & DATA PROTECTION

Keep our systems and data secure



It is critical that you know what to do to keep our data secure. More than ever organisations are under increased risks of various types of cyber attacks. You can help mitigate these attacks by:

- Being aware of dubious emails. If you are unsure do not click on links or attachments. Instead send it to: [Security@sabiogroup.com](mailto:Security@sabiogroup.com)
- Creating strong passwords for all accounts and equipment.
- Be on alert for people attempting to lure you into providing them with company information that could be used fraudulently
- Any request to work outside of your employment contract location needs to be going via your senior manager and People so that we can ascertain various risks (employment law, financial as in corporation tax liabilities and security).

We gather and use certain information about individuals as part of our work. We also have access to information on behalf of our customers and suppliers. It is important that you know how to handle it in line with the General Data Protection Regulations (GDPR). Please ensure you have completed your GDRP training where you will learn more about data protection and below you will find links to Sabio supporting data protection policies.

### Where to find out more:

Information Security Sabio Sharepoint | Speak to your Line Manager, Information Security Team or People Partner

# PRINCIPLE 15

## BUSINESS CONTINUITY

We have robust plans in place to ensure business continuity in the event of an incident or emergency



In the event of a major incident or emergency its important that we mitigate the impact to the business, our employees, customers and investors and get everything back to normal as soon as practically possible.

As part of our business continuity planning approach, we document potential issues that the business has identified as being of a realistic and potential danger and identify the key action that will be taken in the event of an incident.

Business continuity responsibilities are assigned to key individuals across the organisation who will play a role in supporting these types of incidents.

Regular internal testing takes place to ensure that plans are robust and that those part of business continuity teams are clear what is expected of them. Lessons learnt from these exercises are then used to improve the business continuity planning documentation.

In the event of an emergency, we may need to contact you, therefore it is important that you ensure that your work and personal contact as well as your emergency contact details are kept up to date on Cascade (Wise).

Will add also "Emergency contact details" on WISE are up to date.

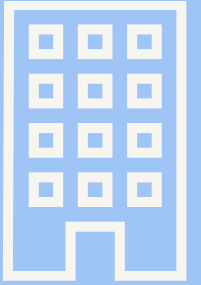
### **Where to find out more:**

Business Continuity Plans | Speak to Information Security Team or People Partner

# PRINCIPLE 16

## SUPPLIER SELECTION

We make sure our suppliers are responsible businesses



Sabio has a stringent vetting process ensuring that whoever we work with is not only competent to deliver the service expected, but that they operate within the relevant laws and legislation applicable.

We ensure that any supplier working on our behalf is treated as an extension of our organisation, with mirrored SLA's and contractual obligations.

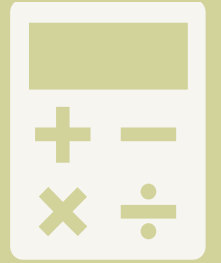
**Where to find out more:**  
Speak with Legal Team or Finance



# PRINCIPLE 17

## PRICING FEES AND PAYMENT

Our pricing approach



Our prices and fees are always competitive for the high-quality tailored service that we provide.

As such, we do not generally offer arbitrary discounts; a reduction in price is only enabled by reducing the level or extent of solutions and services to be delivered. That said, we always try to propose solutions which accommodate our clients' available budgets and timescales.

Wherever possible we agree on our fees and basis of charges clearly in writing in advance, so that we and our clients can plan reliably for what lies ahead, how it is to be achieved and with financial justification.

We aim to be as flexible as possible in the way that our solutions and services are charged.

Some clients prefer fixed project costs; others are happier with a time and materials basis, and we try to work with payment plans that will be best for the client.

We will not accept or give hidden discounts or incentives – neither on an individual basis nor on behalf of the organisation.

**Where to find out more:**  
Speak with Legal Team or Finance

sabiogroup.com

 @sabiosense

 info@sabiogroup.com