

Capco Statement on Modern Slavery

This Statement sets out the measures that The Capital Markets Company, Capco, has taken and continues to take to ensure that modern slavery and/or human trafficking does not take place within our business, our clients or our supply chain. It also affirms our commitment to supporting and respecting the UN Universal Declaration of Human Rights, the 10 Principles of the UN Global Compact, and other internationally proclaimed human rights standards, across the organisation.

Our business

Capco is a global management and technology consultancy dedicated to the financial services and energy industries. Our professionals combine innovative thinking, with unrivalled industry and capability expertise to offer clients consulting expertise, complex technology and package integration, transformation delivery and managed services to move their organisations forward. Through our collaborative and efficient approach, we help our clients successfully innovate, increase revenues, manage risk and regulatory change, reduce costs and enhance controls. We serve our clients from offices in leading financial centres across the Americas, Europe and Asia Pacific

Our commitment and values

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Capco has a 'zero tolerance' approach to any form of modern slavery of which we become aware. We are committed to acting responsibly, socially, ethically and with integrity and transparency in all our business dealings, and to putting effective frameworks and controls in place to identify and safeguard the firm against any form of modern slavery in our business, clients or supply chain.

Our company values, listed below, reinforce our commitment:

1. Respect
2. Integrity
3. Excellence
4. Commitment
5. Knowledge

Our values are the essence of who we are and the way we work with our clients, suppliers and each other at Capco. They outline how we are expected to conduct ourselves at work and help us to make the right decisions for our business. All employees at Capco have a duty to uphold these values and to demonstrate them in the way they behave at work.

Our policies

We enforce several Firm-wide policies to ensure we conduct our business in an ethical and transparent way. These include:

1. **Recruitment:** We operate a robust recruitment policy, including eligibility and background checks for all potential and current employees, to safeguard against human trafficking or individuals being forced to work against their will. Our contracts with third party suppliers include anti-slavery / trafficking obligations.
2. **Whistleblowing:** We operate whistleblowing provisions, including the Speak-Up independent helpline and website that encourage all employees to raise any concerns about how colleagues and prospective colleagues are treated, and report any suspicious practices within our business, clients or supply chain, without fear of reprisal. These provisions are reinforced in a clear statement of zero tolerance of unacceptable behavior from our CEO, and an expectation of all our people that they will report unacceptable behavior that they experience or witness.
3. **Code of Business Conduct:** Our Code outlines the manner in which we behave as an organisation and how we expect all our employees and suppliers to act in relation to our statutory obligation and values in relation to human slavery and trafficking, and more broadly.
4. **Anti-bribery and Corruption:** It is our policy to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and we are committed to acting professionally, fairly and with integrity in all our business dealings and relationships, wherever we operate. We are committed to implementing and enforcing effective systems to report and counter bribery and corruption in all its forms.
5. **Procurement:** Our policy sets out a framework by which services to the business should be procured. Capco expects all our suppliers to adhere to International Labour Organization Labour Standards and good employment practices in the supply of goods and services. Procurement utilises a risk-based, due diligence approach in relation to for all new suppliers to Capco and all new supplier requests are vetted and formally approved by our Procurement function. This ensures Procurement can ensure appropriate due diligence has been conducted on all new suppliers prior to working with the firm. Capco employees engaging in the procurement of goods and services are committed to acting with fairness, professionalism and integrity.
6. **Corporate Responsibility:** In 2019 Capco launched our Capco Social Responsibility Standard to act as a guide for Capco employees on our approach to Corporate Social Responsibility and the charitable organisations with which Capco partners globally across the firm.

Our customers

Capco works with our customers and encourages a joint approach to the prevention of modern slavery and/or human trafficking practice within our projects and teams. We share this statement with our customers and, where they do not already have similar provision, we encourage them to adopt similar standards.

Our performance indicators

We monitor the effectiveness of the steps that we are taking to ensure that modern slavery and/or human trafficking does not take place anywhere within our business, customers and supply chain, as follows:

1. Any reports of modern slavery or human trafficking from our employees, suppliers, customers, the public, or law enforcement agencies to indicate that modern slavery and/or human trafficking practices have been identified;
2. Awareness of our provisions amongst our leaders, staff and suppliers;
3. A high-level risk assessment on the terms of our statement;
4. The completion of relevant mandatory training (e.g. on our Code of Business Conduct).

Approval for this Statement

This statement was approved for Capco as follows:



Richard Gartside
Chief Risk Officer (CRO)