

# 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, a Wipro Company, is a global technology and management consultancy specializing in driving digital transformation in the financial services industry. With a growing client portfolio comprising of over 100 global organizations, Capco operates at the intersection of business and technology by combining innovative thinking with unrivalled industry knowledge to deliver end-to-end data driven solutions and fast-track digital initiatives for banking and payments, capital markets, wealth and asset management, insurance and the energy sector. Capco's cutting edge ingenuity is brought to life in its innovation labs and award-winning Be Yourself At Work culture and diverse talent.

Our approach is tailor-made to fit with each client's problem with an emphasis on building long-term strategic partnerships that foster collaboration and trust. We have the people, the vision, and the passion.

Capco is committed to providing clients with practical solutions. We offer a globally integrated service with offices in leading financial centers across the Americas, Europe, India, and Asia Pacific.

## Our commitment and values

Modern slavery encompasses slavery, servitude, human trafficking, child slavery and forced labour. Capco has a 'zero tolerance' approach to any form of modern slavery in our business. 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:

Be Yourself at Work	Make a Difference	Act with Integrity
At Capco, we value the difference you make, and the differences that make you. Our #BeYourselfAtWork culture champions diversity, equity and inclusivity, and we bring a collaborative mindset to our partnerships with clients and colleagues. #BeYourselfAtWork is the cornerstone of our success and a value that our employees live and breathe every day.	At Capco, we are dedicated to making a difference – for our clients and their customers, our industry, and our communities. We challenge the status quo and embrace new perspectives through our can-do attitude and determination to think beyond boundaries. We look to reimagine what's possible as we build a lasting legacy for our clients.	At Capco, we hold ourselves to the highest standards of ethical behaviour. We speak up with passion to champion what is right for our clients, people, and the communities in which we serve. Acting with integrity is the foundation of our success as trusted advisors to our clients around the world.

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 expectations of how to conduct ourselves at work and help us to make the right decisions for our business. All our people 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 and contractors, to safeguard against human trafficking, child labour 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 concerns, anonymously if they wish, 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 behaviour from our CEO, and an expectation of all our people that they will report any unacceptable behaviour that they experience or witness.
3. **Code of Business Conduct:** Our Code outlines the way we behave as an organisation and how we expect all our people and suppliers to act in relation to our statutory obligation and values and 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 are procured. Capco expects all suppliers to adhere to International Labour Organization Labour Standards, good employment practices and our [Supplier Code of Conduct](#) in the supply of goods and services. The Procurement team conducts a comprehensive, risk-based, due diligence review in relation to the appointment of all new suppliers to Capco and all new supplier requests are vetted and formally approved by our Procurement Team. This ensures the Team can ensure that robust due diligence standards have been applied in relation to all new suppliers prior to working with the firm. All Capco people engaging in the procurement of goods and services for the firm are committed to acting with fairness, professionalism, and integrity at all times.
6. **Corporate Responsibility:** Our CSR policy acts 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 collaborates 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 does not take place anywhere within our business, customers, and supply chain, as follows:

1. Thorough investigation of any reports of modern slavery or human trafficking from our people, 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, people, and suppliers.
3. A high-level risk assessment on the terms of our statement.
4. The completion of relevant mandatory training (e.g., Code of Business Conduct, Respect at Work and DEI).
5. Internal Audits of recruiting, hiring and procurement policies and procedures.

## Approval for this Statement

This statement is approved for Capco as follows:



Richard Gartside  
Chief Risk Officer (CRO)