

# CAPCO STATEMENT ON THE MODERN SLAVERY ACT 2015

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This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that The Capital Markets Company (UK) Limited, Capco, has taken and continues to take to ensure that modern slavery and/or human trafficking does not take place within our business, at our clients or within our supply chain.

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 ethically and with integrity and transparency in all our business dealings and to putting effective frameworks and controls in place to identify and safeguard against any form of modern slavery taking place within the business, clients or supply chain.

## OUR BUSINESS

Capco is a global provider of integrated business, digital, and technology consulting services dedicated to the financial services sector.

## POSSIBLE EXPOSURE

We consider our recruitment function and procurement of our housekeeping and facilities services as potential exposure to modern slavery and or human trafficking due to the levels of inherent risk.

## OUR POLICIES

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

### 1. Recruitment:

We operate a robust recruitment policy, including eligibility 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 on these suppliers.

### 2. Whistleblowing:

We operate a whistleblowing policy that encourages all employees to raise concerns about how colleagues and prospective colleagues are being treated, or report suspicious practices within our business, clients or supply chain, without fear of reprisal.

### 3. Code of Business Conduct:

This Code outlines the manner in which we behave as an organisation and how we expect our employees and suppliers to act in relation to our statutory obligation and values.

### 4. Bribery and anti-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 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 counter bribery and corruption in all its forms.

### 5. Procurement:

Our policy sets out a framework by which services should be procured. Capco expects suppliers to adhere to national Labour Organization principles when supplying goods and services. Procurement utilises a risk based due diligence approach for all new suppliers to Capco and in addition, all new supplier requests are approved by procurement. This ensures procurement can evaluate whether appropriate due diligence has been conducted on all new suppliers.

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 the Capco Social Responsibility Standard to act as a guide for Capco employees around the approach to corporate social responsibility and the charitable organisations in which Capco engages with and supports at a global level.



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## OUR SUPPLIERS

Capco upholds a formal procurement policy and where appropriate to do so, we conduct proportionate due diligence on suppliers before appointing them as a supplier.

## OUR CUSTOMERS

Capco also works with our customers and encourages a joint approach to the prevention of modern slavery and or human trafficking practices 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 provisions.


## OUR PERFORMANCE INDICATORS

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

1. Any reports of modern slavery or human trafficking practice 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. Assessment: Performing a high-level risk assessment on the terms of our statement;
4. Training: Training employees through their human resources and supply chain teams.

## APPROVAL FOR THIS STATEMENT

This statement was approved by the Capco UK Leadership team for Capco.



**Michael Ethelston**  
Managing Partner of Capco UK

Review date: **February 2019**