

Capco Statement in respect of the Modern Slavery Act

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 is continuing to take measures to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Capco has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

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

Our high risk areas

We consider our risk areas to be within the recruitment function and procurement of housekeeping /facilities related services.

Our policies

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

1. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility checks for all employees to safeguard against human trafficking or individuals being forced to work against their will. Our contracts with 3rd Party suppliers impose anti-slavery obligations on those 3rd party suppliers.
2. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
3. Code of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
4. Bribery and anti-corruption policy. 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 and implementing and enforcing effective systems to counter bribery.
5. Procurement policy. This ensures products and services are acquired consistently throughout the enterprise.

Capco employees engaging in the procurement of goods and services are committed to acting with fairness, professionalism and integrity. Our contracts with 3rd Party suppliers impose anti-slavery obligations on those 3rd party suppliers.

Our suppliers

Capco operates a procurement policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that organisation has never been convicted of offenses relating to modern slavery. Our anti-slavery statement forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this requirement.

In addition to the above, as part of our contract with suppliers and agencies, we require that:

- The Supplier/ agency shall refrain from entering a contract with a firm or person who, to its knowledge, does not comply with the provisions covered by this clause.
- The Supplier/ agency represents and warrants that neither the Supplier nor any of its officers, employees or other persons (add as appropriate – Agency contract refers to Workers) associated with it:
 - has been convicted of any offence involving slavery and human trafficking; and
 - has been or is the subject of any investigation, inquiry or enforcement proceedings by any governmental, administrative or regulatory body regarding any offence or alleged offence of or in connection with slavery and human trafficking.
- The Supplier/ agency warrants that their employees, sub-contractors or other persons employed by them on a once off or infrequent basis shall be paid at least the national minimum wage or national living wage (as appropriate)
- The Supplier/ agency shall implement due diligence procedures for its own suppliers, sub-contractors and other participants in its supply chains, to ensure that there is no slavery or human trafficking in its supply chains.
- In performing its obligations under Engagements the Supplier/ agency shall ensure that each of its sub-contractors shall comply with the Modern Slavery Act 2015, failing which Capco shall be entitled to rely on the provisions of termination as expressly stated within the contract for services.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Approval for this statement

This statement was approved by the Leadership team for Capco on 19 February 2018

Name: Michael Ethelston

Title: Managing Partner of Capco UK

Signature:



Date: 19/2/2018

Review date: February 2019