



## Capital One (Europe) plc – Slavery and Human Trafficking Statement

This statement sets out the steps taken by Capital One (Europe) plc (“Capital One”) to prevent modern slavery in its business and supply chains.

### Introduction

At Capital One we recognise the responsibility that we share with our suppliers, to promote ethical business practices and policies that protect workers from being abused or exploited. We are committed to having practices to combat slavery. The term “slavery” is used to encapsulate the crimes of slavery, servitude, forced or compulsory labour and human trafficking.

### Our structure

Capital One is part of a group which offers a range of financial products and services, predominantly in the US. The ultimate parent company of Capital One is Capital One Financial Corporation which is headquartered in Virginia, US. Capital One is a monoline credit card issuer providing credit card facilities to customers in the UK. For more information about our business, visit the About us page on our website.

### Our business and supply chain

Capital One’s values and culture are central to the way we conduct business, with a particular focus on transparency and fairness so that customers can have the confidence they are securing a clear and fair product.

In relation to our own business, our employment decisions, including those involving compensation, are made on a non-discriminatory basis, and without regard to sex, race, colour, age, national origin, religion, disability, marital status, sexual orientation, gender identity, citizenship or pregnancy or any other status protected by applicable law. We provide a fair and competitive total compensation package to employees that will attract, retain and motivate talent.

We use suppliers in all areas of our business, including IT, administration, call centres, facilities management, marketing, advertising and HR support. As a financial services provider regulated by the Financial Conduct Authority, we have rigorous procedures around how we select, contract with and monitor our suppliers.

### How we are preventing slavery

We have developed an anti-slavery procedure which set out how we are striving to combat slavery and reflects our commitment to acting ethically and with integrity in all business relationships. We are actively taking measures to try and ensure slavery is not taking place anywhere in our business or supply chain.

The key steps which we have taken during 2016 towards ensuring that there is no slavery in our supply chain are as follows:

- **Risk Assessment:** we have given each of our suppliers a risk rating and assessed them against key risk factors of slavery, namely: geographical location of supplier and its subcontractors; resource allocation; industry sector and historical behaviour, in order to assess whether there is an increased risk of slavery. We have not found any evidence of slavery but have assessed some suppliers as having a higher risk than others of slavery (referred to in this statement as suppliers carrying a “greater risk” of slavery).
- **Business Awareness:** the new legal requirements in relation to slavery have been communicated to key business areas, which has raised awareness of the importance of combating slavery within our supply chain.
- **Contract terms:** we have introduced obligations in our standard form supplier contracts requiring suppliers to comply with the Modern Slavery Act 2015 and notify Capital One immediately if they become aware of any modern slavery within their supply chains. Suppliers which breach these obligations will face appropriate actions which could include termination of contracts.

In 2017, we propose to take the following further steps to combat slavery:

- **Due Diligence:** We will assess new suppliers for slavery risk and ensure those which carry greater risk will be subject to increased monitoring. We will monitor behaviour of all suppliers to ensure potential slavery issues are identified promptly.
- **Training:** We will continue to raise awareness of the Modern Slavery Act 2015 and those staff involved in supplier management and procurement will receive further detailed training in Capital One’s responsibilities in relation to oversight of its supply chain.
- **Monitoring programme of suppliers:** Where appropriate, for suppliers where there is a greater risk of slavery, our monitoring programme will include on site assessments, regular interaction through business reviews and regular dialogue. This will include awareness of key sub-contractors of the suppliers.
- **Contract terms with existing suppliers:** We will negotiate amendments to existing supplier contracts where our risk assessments referred to above have identified a greater risk of slavery.

Our anti-slavery procedure and training programme provides employees with information on how to report slavery. We encourage confidential communication and have policies in place to protect whistle blowers.

This statement was prepared for the financial year ending 31st December 2016 and approved by the Board of Directors of Capital One (Europe) plc.

Signed

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Amy Lenander  
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4/21/2017