

## 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 have robust practices in place to prevent 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 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 law. We provide a fair and competitive 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

Our anti-slavery procedure sets out how we combat slavery and reflects our commitment to acting ethically and with integrity in all business relationships. We continue to take measures to ensure that slavery is not taking place anywhere in our business or supply chain.

In 2018, we continued to deliver our commitments to prevent slavery within our business and supply chain by taking the following steps:

- **Risk assessments:** in order to assess whether there is an increased risk of slavery, all of our suppliers have been given a risk rating and have been assessed against key risk factors of slavery, namely: geographical location of the supplier and its subcontractors; resource allocation; industry sector and historical behaviour. We have not found any evidence of slavery in our supply chain. Some suppliers have been assessed as having a higher risk of slavery than others (referred to in this statement as suppliers carrying a “greater risk” of slavery).
- **Monitoring programme of suppliers:** our monitoring programme includes behavioural monitoring through reputational searches online, on site assessments, interaction through business reviews and regular dialogue with suppliers. Monitoring also includes having awareness of key sub-contractors of suppliers. For suppliers where there is a greater risk

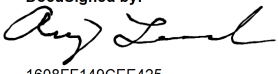
of slavery, we ensure effective controls are in place to ensure these suppliers are subject to increased monitoring.

- **Business awareness and training:** we have continued to ensure the legal requirements in relation to slavery are communicated to key business areas to maintain awareness of the importance of combating slavery within our supply chain and delivered detailed training to those staff involved in supplier management.
- **Contract terms:** we have continued to include obligations in our standard form supplier contracts which have obligations 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 business or supply chains. Suppliers which breach these obligations will face appropriate actions which could include termination of the contract.
- **Information for employees:** employees can access our anti-slavery procedure through our intranet site which includes information and resources to raise awareness in relation to slavery. Our anti-slavery procedure and training programme informs employees how to report slavery. We encourage confidential communication and have policies in place to protect whistle blowers.

In 2019, we will continue to take the above steps to prevent slavery, and will regularly review and improve our processes.

This statement was prepared for the financial year ending 31<sup>st</sup> December 2018 and approved by the Board of Directors of Capital One (Europe) plc on 26 February 2019.

Signed

DocuSigned by:  
  
1608FF149CEE425...  
Amy Lenander, Chief Executive Officer

Capital One (Europe) plc  
3/29/2019 | 4:21 PM GMT