



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

In 2016, we developed an anti-slavery procedure which sets out how we are striving to combat slavery and reflects our commitment to acting ethically and with integrity in all business relationships. We continue to take measures to try and ensure slavery is not taking place anywhere in our business or supply chain.

In 2017, we continued to deliver the commitments we made to preventing slavery within our business and supply chain by taking the following steps:

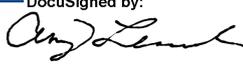
- Risk assessments: all of our suppliers have been given a risk rating and assessed against key risk factors of slavery, namely: geographical location of supplier and its subcontractors; resource allocation; industry sector and historical behaviour, in order to assess whether there is an increased risk of slavery. We have not found any evidence of slavery but have assessed some suppliers as having a slightly greater risk than others of slavery.
- Monitoring programme of suppliers: our monitoring programme includes behavioural monitoring through news alerts, on site assessments, regular interaction through business reviews and regular dialogue with suppliers. Monitoring also

includes awareness of key sub-contractors of suppliers. For suppliers where there is a greater risk of slavery, we have put in place effective controls 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. We delivered detailed training to those staff involved in supplier management. Training on the Modern Slavery Act 2015 is included in the programme of training delivered to third party managers twice yearly.
- Contract terms: we have continued to include 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 the contract.
- Information for Capital One employees: we provide 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 2017 and approved by the Board of Directors of Capital One (Europe) plc.

Signed

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Amy Lenander, Head of UK Card
Capital One (Europe) plc
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