

## ***VTB Capital Plc – Modern Slavery Act Statement***

This statement sets out VTB Capital Plc's ongoing commitment and support for the eradication of modern slavery and human trafficking. In line with the United Nations Guiding Principles on Business and Human Rights, VTB Capital Plc recognises the duty of nations is to protect human rights and the responsibility of businesses to respect and support them in this endeavour.

### **Structure**

VTB Capital Plc ("VTBC") is a leading wholesale financial services practice which is part of a global financial services group headquartered in Russia.

VTBC employs staff in the United Kingdom and Singapore. A significant proportion of its suppliers are based in these jurisdictions but as part of a global financial services group, VTBC also engages with suppliers in a number of other jurisdictions across the globe.

### **Supply chains**

VTBC's supply chains include (but are not limited to):

- Suppliers of IT hardware and software
- Building facilities services
- Legal, accountancy and other professional intermediaries
- Suppliers of transaction related services, infrastructure and market data

### **Policies on slavery and human trafficking**

VTBC is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in its business. VTBC has implemented policies and procedures to undertake due diligence on its suppliers. Separately VTBC also maintains a number of policies covering conduct, professional standards and whistleblowing, designed to promote appropriate behaviours as well as encouraging and protecting anyone who wishes to raise concerns about wrongdoing or any failure to adhere to expected standards of conduct.

### **Due Diligence processes for slavery and human trafficking.**

Our recruitment processes are transparent. We communicate directly with candidates to discuss job opportunities and to confirm the details of any offer made. We have robust procedures in place for the vetting of new employees and we expect our supply chains to operate to similar such standards in respect of their workforce.

In the event any of our employees have been complicit in human trafficking or modern slavery, such employees can expect VTBC to take appropriate disciplinary action against them. We seek to develop business

relationships with organisations who share a similar set of values with respect to modern slavery and human trafficking. Going forward we will continue to review the relationships of our suppliers.

VTBC is conscious that imported products or services sourced from outside its places of business may, dependent on the location of the supplier, potentially have more risk of slavery or human trafficking issues. VTBC's approach to due diligence undertaken is intended to take into consideration the potential for such increased risk.

### **Training**

VTBC has a long established training programme focused on issues of conduct and compliance. In addition, in order to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, VTBC is incorporating specific training to its staff on the subject of modern slavery and human trafficking.

### **Our effectiveness in combating slavery and human trafficking**

The Board shall take the responsibility for implementing the systems and controls outlined in this statement and shall provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organization.

We will continue to monitor and review our approach to combatting modern slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 20 December 2019.

A handwritten signature in blue ink, appearing to read "Nick Hutt", written over a horizontal line.

Nick Hutt

CEO VTB Capital Plc