

Statement on Slavery and Human Trafficking

This Statement on Slavery and Human Trafficking for the financial year ending 31 December 2019 sets out the steps that VTB Capital plc (“VTBC”) has taken to tackle modern slavery (as defined in the Modern Slavery Act 2015 (the “Act”)) in its business and supply chains. It is made pursuant to section 54(1) of the Act and was approved by VTBC’s Board of Directors on 23 January 2020.

Structure and Supply Chains

VTBC is a leading wholesale financial services practice, which is part of a global financial services group headquartered in the Russian Federation. VTBC’s principal business activities are its advisory and capital markets business (labelled “Global Banking”) and its securities and derivatives trading business (labelled “Global Markets”) which undertakes both client business and own-account risk taking in Fixed Income (trading, sales, syndication and underwriting), Cash Equities and Cash Bonds.

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.

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; and
- Suppliers of transaction related services, infrastructure and market data.

Policies on Modern Slavery

VTBC continues to support the eradication of modern slavery and human trafficking. In line with the United Nations Guiding Principles on Business and Human Rights, VTBC recognises the duty of nations is to protect human rights and the responsibility of businesses to respect and support them in this endeavour.

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

VTBC’s 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 for Staff

VTBC has a long established staff-training programme focused on issues of conduct and compliance. This includes a requirement for staff to complete mandatory annual training on financial crime risks faced by the firm such as money laundering, bribery and corruption, sanctions, fraud and tax evasion (including facilitation of tax evasion).

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 incorporated specific training to its staff on the subject of modern slavery and human trafficking in this financial year.

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 organisation.

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

A handwritten signature in black ink, appearing to read "Nick Hutt", written in a cursive style.

Nick Hutt

Chief Executive Officer and a member of the Board of Directors of VTB Capital plc