

Group Human Rights and Modern Slavery Policy

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This is a Group policy

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Introduction

Vanquis Banking Group plc and its operating companies (“VBG”) is a specialist lending business which operates across the United Kingdom (UK) whose purpose *is to deliver caring banking so our customers can make the most of life’s opportunities*. This encompasses the wide-ranging role that VBG plays in helping to protect human rights and prevent modern slavery and/or human trafficking. Human Rights are the basic rights and freedoms that belong to every person in the world. As a Group, we seek to act in accordance with internationally-recognised human rights laws and standards, and we are opposed to slavery and human trafficking in both our direct operations and in our supply chains. As such, the Group will not knowingly support or do business with any organisation that acts contrary to these standards or who is involved in modern slavery or human trafficking.

Our approach

VBG is committed to respecting everyone’s human rights in all aspects of our operations. Whilst we primarily work in the UK, we believe that we have a responsibility to ensure that human rights are understood and observed in the areas that we work, including those of suppliers, including those who are based outside our main country of operation.

In doing so, VBG supports the **United Nations Guiding Principles on Business and Human Rights** as the recognised framework for the Group to respect human rights in their own operations and through their relationships with other key stakeholders (e.g. suppliers). The Group also supports the **United Nations Universal Declaration of Human Rights** (UNUDHR), the **United Nations Declaration on the Rights of Indigenous People** (UNDRIP) and the **International Labour Organization’s (ILO) Fundamental Conventions** which cover freedom of association and collective bargaining, the abolition of all forms of compulsory and forced labour, respect for equality and the elimination of child labour. VBG also takes action to advance broader social, environmental and ethical goals, such as the UN Sustainable Development Goals (SDGs).

In addition to this, we observe and seek to understand all current and emerging human rights-related legislation and ensure that our policies and practices are in compliance with the regulation. This comprises promoting human rights through

our employment policies and practices, and our supply chain including the UK Modern Slavery Act 2015. The Group is committed to understanding the risks posed by modern slavery and human trafficking, and ensuring that they do not exist in our businesses or supply chains. Furthermore, we ensure reinforcing human rights through our products and services.

Benefits of the Policy

This Policy aims to achieve a consistent and comprehensive approach to respecting human rights across VBG that will:

- support colleagues with guidance to understand the extent of our responsibilities and commitments;
- improve VBG's compliance with international human rights legislation/standards (eg the requirements of the Modern Slavery Act 2015);
- ensure due diligence processes and procedures are established and maintained to manage supply chain risks and make sure suppliers comply with the Group's policy requirements and meet legislative requirements including those that relate to the Modern Slavery Act 2015;
- help deliver/support the Group's purpose to help put people on a path to a better everyday life; and
- ensure to key stakeholders that VBG manages its human rights and modern slavery impacts effectively.

In addition, this Policy will provide the Group with some guidance when assessing and managing stakeholders relationships, i.e. colleagues; customers; suppliers; sub-contractors; joint venture partners; and communities.

Our Policy

The Policy outlines the human rights principles that the Group respects and promotes within its operations and business model in accordance with the UN Guiding Principles on Business and Human Rights. These principles apply to the Group and its management of the business and stakeholder relationships. The policy covers four main stakeholder relationships i.e. the Group's responsibilities as an employer and a provider of financial services, and its responsibilities for purchasing, sourcing and communities.

Policy Principles

We will seek to:

- avoid causing or contributing to adverse human rights and modern slavery impacts through our own business activities and, in the event of such impacts occurring, address them in a timely manner;
- prevent or mitigate adverse human rights and modern slavery impacts that are directly related to our operations, products and services through our business relationships (e.g. with contractors and suppliers);
- provide for, or cooperate in their remediation through legitimate processes, if we identify that we have caused or contributed to adverse human rights and modern slavery impacts; and
- continue to look for ways to support the promotion of human rights and elimination of modern slavery and human trafficking within our operations and in the indirect operations of our supply chains.

As a financial services business, we have identified the following main areas of responsibility with respect to human rights and modern slavery:

Inclusion and Diversity: Our commitment is to provide an inclusive and diverse workplace culture where all people are treated fairly and with respect. We have a specific policy which sets out our commitment and the responsibilities of management and colleagues – please see the Inclusion and Diversity Policy for more information. All our suppliers and contractors are required to comply with any local legislation which applies to equality, diversity and inclusion as well as adhering to our purpose and behaviours, supporting us in the delivery of our commitment.

Modern Slavery and Human Trafficking: VBG has a policy of zero-tolerance towards acts of modern slavery which are unlawful and are a violation of fundamental human rights. We require our suppliers and contractors to comply with all applicable local legislation as well as adhering to our purpose and behaviours, supporting us in the delivery of our commitment.

Health, Safety and Wellbeing: All VBG colleagues will work in an environment that is both safe and healthy, in line with our Group Mental Health and Wellbeing Policy and other health and safety policies. We require our suppliers and contractors to

comply with all applicable local legislation as well as adhering to our purpose and behaviours, supporting us in the delivery of our commitment.

Child Labour: VBG primarily operates in the UK and complies with all relevant legislation regarding the issue of child labour. We do not tolerate the use of child labour and require that our contractors and suppliers do not to use children in their operations (including in their value chain).

Working Hours: VBG will ensure that working hours are reasonable and comply with the law and industry standards.

Remuneration: VBG is committed to ensuring that their direct colleagues are not paid lower than that required by law. We require our suppliers to comply with all applicable legislation or, if there is no applicable local law in the country in which they operate, ensure that their pay will not be less than the level paid generally within that industry.

Colleague terms and conditions: VBG will provide clear contracts which detail the terms and conditions of colleagues' employment. We will ensure that work performed by colleagues is on the basis of recognised law and practice.

Other labour rights: In addition to the above, we provide fair working conditions for our colleagues including resting time, holiday entitlements, maternity/paternity leave and benefits. With regard to these rights we comply with all applicable legislation. We require our suppliers and contractors to comply with all applicable local legislation as well as adhering to our purpose and behaviours, supporting us in the delivery of our commitment.

Freedom of Association and Colleague Representation: We respect the right of our colleagues to join or not to join a trade union and as such they are free to join an organisation of their choice to represent them in line with local legislation. VBG engages with Colleague Forums and seeks to consult with these representatives where appropriate. We require our suppliers and contractors to respect their employees' right to freedom of association. If operating in the UK or anywhere else where local rights to collective bargaining exist we require suppliers and contractors to allow this.

Speak Up: We respect that colleagues, customers, suppliers and contractors should be free to speak up where they see something that is wrong or they consider this is unfair. Individuals who Speak Up will not suffer a detriment. For more information for colleagues please see the Grievance, Bullying and Harassment Policy and for third parties please see the Whistleblowing Policy.

Privacy: We have Data Protection Policies and processes in place to protect individual's confidential information and privacy.

External Links

VBG Modern Slavery Statement

<https://www.vanquisbankinggroup.com/modern-slavery-statement/>

The UN Guiding Principles on Business and Human Rights

http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

United Nations Universal Declaration of Human Rights

<https://www.un.org/en/about-us/universal-declaration-of-human-rights>

United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)

<https://www.un.org/development/desa/indigenouspeoples/>

United Nations Sustainable Development Goals

<https://sdgs.un.org/goals>

Policy Governance

This Human Rights and Modern Slavery Policy is to be reviewed periodically to ensure our best practices among colleagues, suppliers, customers and communities. The Policy is approved by senior manager and reviewed by the Group Board which is reported to by the directors, officers and committees' chairs of the Group. We engage internally and externally on human rights and encourage colleagues to attend training on human rights-related issues. We also monitor our activities and performance to prevent any violation or breach of policy.

The commitments and policies referenced in this statement apply to Vanquis Banking Group plc, its subsidiaries, colleagues and officers of the Group. This also applies to all businesses and operations where we have management control and where permitted by national laws and regulations. This policy applies to all colleagues across VBG regardless of seniority, including workers or employees within its subsidiary companies. It does not apply to agents, contractors, suppliers or other third parties. This policy does not form part of your terms and conditions of employment and may be amended at any time.

Who can use this Policy

The Policy can be used by the Group, subsidiaries, internal and external stakeholders. This Policy reflects the issues of human rights for workers such as our colleagues and suppliers, and non-labour related rights issues such as our customers and communities.

How to use this Policy

The Policy can be used as a reference point to the Group when developing, maintaining and managing stakeholders relationships. However, it requires to be considered as minimum guidance as it is not possible to provide a comprehensive content of all human rights-related activities that the Group should undertake. Hence, business units should provide additional control around the policies listed in this statement as they see appropriate for the circumstances of their business. Please refer to our Modern Slavery Statement at www.vanquisbankinggroup.com, to learn about the actions we've taken to uphold this policy in the most recent year.

Accessibility

If you have a disability, require additional support, if English is not your first language or you need help to understand this Policy, you should speak with your Manager or Human Resources who will make appropriate arrangements to support you through the process.

Breach

If a policy breach is identified as having been committed by a colleague, HR should be contacted and any relevant actions taken to address the breach. Failure

to adhere to the Policy or failure to report a policy breach may result in disciplinary action being taken.

If a policy breach is identified as having been committed by a supplier, Procurement and Legal should be contacted. Failure to adhere to the Policy may result in VBG terminating the commercial contract with the supplier.

Policy Owner

- This Policy was approved in February 2022 by the Board of Vanquis Banking Group plc on behalf of all the Group's subsidiaries.
- The sustainability team should provide approval in the event of amendment and review the Policy on an annual basis.
- Input should also be sought from Procurement, Legal, Corporate Affairs and Sustainability.

Documents related to this Policy

- Guides for Colleague and Manager
- Procurement Policy
- Data Protection Policy
- Colleague Privacy Notice(s)

Controls

- Documented, and regularly monitored.