

# Pillar 3 Disclosures

**Vanquis Banking Group plc**  
31 December 2022

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## 1 Introduction

This document sets out the consolidated Vanquis Banking Group plc (the Company) Pillar 3 disclosures (together with its subsidiaries the Group) at 31 December 2022 in accordance with the requirements of the UK Capital Requirements Regulation (CRR).

On 2 March 2023, Provident Financial plc changed its name to Vanquis Banking Group plc. Qualitative or quantitative references herein to prior periods relate to Provident Financial plc and the Provident Financial Group as disclosed at the time of publication.

### 1.1 The Group

On 31 December 2022 the Group comprised two principal trading divisions:

- Vanquis Bank, which provides credit cards to the non-standard UK consumer credit market, offers unsecured personal loans and accepts retail deposits; and
- Moneybarn, which provides vehicle finance in the UK.

Vanquis Bank is authorised by the Prudential Regulation Authority (PRA) and regulated by the PRA and the Financial Conduct Authority (FCA). The PRA sets requirements for Vanquis Bank relating to capital and liquidity adequacy and large exposures.

The Group, incorporating Vanquis Bank and Moneybarn, is the subject of consolidated supervision by the PRA by virtue of Vanquis Banking Group plc (formerly Provident Financial plc) being the parent company of Vanquis Bank. The PRA sets requirements for the consolidated Group in respect of capital and liquidity adequacy and large exposures. Moneybarn is regulated by the FCA.

### 1.2 Disclosure framework

The Group is regulated for prudential capital purposes under the Basel 3 regime, the international regime governing capital maintenance in banks, which is supervised by the Basel Committee on Banking Supervision (BCBS). In the UK this regime is enforced through the PRA Rulebook (the Rulebook), following the implementation of the Financial Services Act 2021 on 1 January 2022. Formerly these rules were applied on a European Union (EU) basis through the fourth Capital Requirements Directive (CRD IV) and the first Capital Requirements Regulation (CRR) (Regulation 575/2013). Certain aspects of this EU legislation remain applicable in the UK.

The framework consists of three 'pillars', as summarised below:

- **Pillar 1** is the calculation of minimum regulatory capital requirements that firms are required to hold against risk, the most significant elements for the Group being credit risk and operational risk.
- **Pillar 2** aims to enhance the link between an institution's risk profile, its risk management and risk mitigation systems, and its capital planning. The Group performs an internal capital adequacy assessment process (ICAAP) on at least an annual basis to assess the risk management processes in place and whether additional regulatory capital over and above Pillar 1 should be held based on the risks faced by the Group. The amount of any proposed additional capital requirement is also assessed by the PRA during its capital supervisory review and evaluation process (C-SREP), which also aims to ensure that institutions have adequate arrangements, strategies, processes and mechanisms and capital and liquidity to ensure sound management and coverage of their risks.
- **Pillar 3** complements Pillars 1 and 2 and aims to encourage market discipline by developing a set of disclosure requirements which allow market participants to assess key pieces of information on a firm's capital, risk exposures, risk management processes, leverage and remuneration.

Disclosures have been updated for 2022 following the onshoring of the CRR into the PRA Rulebook as a result of the UK's departure from the EU and the updates made in the version of the CRR by the EU before it became UK law. These included an increased level of prescription in the level, structure and format of the disclosures to be provided, including the introduction of a suite of templates covering all Pillar 3 disclosure matters.

The Group has adopted the standardised approach (SA) for credit risk and the alternative standardised approach (ASA) for operational risk.

### 1.3 Pillar 3 Disclosure Policy

The Group's approved Pillar 3 Disclosure Policy is as follows:

The Company's Pillar 3 disclosures cover the Group as a whole, comprising the Company and all its subsidiary undertakings. They are therefore prepared on the same basis as the Group's consolidated accounts. References to the Group in this document therefore include the Group's banking subsidiary, Vanquis Bank Limited (the Bank).

Pillar 3 disclosures will be made on an annual basis using the Group's financial year-end date of 31 December. The disclosures will be published in line with the publication of the Group's Annual Report and Financial Statements (the Annual Report). More frequent disclosures will be made if there is a material change in the nature of the Group's risk profile during any particular year.

These Pillar 3 disclosures will be published on the Group's corporate website, [www.vanquisbankinggroup.com](http://www.vanquisbankinggroup.com), alongside other disclosures made in the Annual Report, which is published in the same location. Both documents are published on the website at approximately the same time, in accordance with the requirement in Article 433 of the Rulebook.

The Company's Disclosure Policy for Pillar 3 is based on the interpretation of the requirements of the Disclosure (CRR) Part of the Rulebook. The Group is defined as a 'Small and Non-Complex Institution' under these rules (i.e., neither Large nor Other), as it meets the criteria for such classification in Article 4(145) of the CRR. Its disclosure requirements are therefore set out in Article 433b of the Rulebook. This requires that the Group produces an annual Pillar 3 Report and discloses key metrics on a half yearly basis.

## 1 Introduction continued

### 1.3 Pillar 3 Disclosure Policy continued

There are certain disclosures that are only required by the Rulebook where an institution is large or an LREQ firm, as defined by the PRA Rulebook. The Group's balance sheet size is too small to be classified as large or to fall within the LREQ rules on leverage. Therefore, these have not been presented for the Group.

The level of disclosure on remuneration matters is subject to proportionality rules set out in PRA SS2/17 'Remuneration' (updated February 2023). Institutions are divided between level one, level two or level three based on their total assets, which determines the amount of detail required in these disclosures. The Group is a proportionality level three bank as its average total assets do not exceed £13bn. A number of templates in the PRA Rulebook apply only to proportionality level one or two banks and therefore are not applicable to the Group.

### 1.4 Basis and scope of disclosures

This document has been prepared and should be read in conjunction with the Annual Report for the year ended 31 December 2022. The results of Vanquis Banking Group plc and all subsidiary undertakings have been included in the Pillar 3 disclosures and there are no differences between the basis of consolidation for accounting and prudential purposes. These disclosures have been subject to internal verification and have been reviewed by the Risk Committee. These disclosures have not been externally audited and do not constitute any part of the Group's financial statements; however, some of the information within the disclosures also appears in the Annual Report.

Article 432 of the CRR states that institutions may omit one or more of the Pillar 3 disclosures if the information is not regarded as material. Information in disclosures shall be regarded as not material if the Group does not expect that its omission or misstatement would change or influence the assessment or decision of a user relying on that information for the purpose of making economic decisions. No disclosures required by Article 433b have been omitted on the grounds of materiality from this document.

These disclosures have been compiled on the most appropriate basis for this purpose and following the instructions on calculation and classification given in the Rulebook and therefore may not agree directly with disclosures addressing similar matters presented in the Annual Report.

### 1.5 Approval of disclosures

The Group's Pillar 3 disclosures have been reviewed and approved by the Group Risk Committee on behalf of the Board. Separately, the remuneration disclosures detailed in this document have been reviewed and approved by the Group Remuneration Committee on behalf of the Board.

The Risk Committee considered the disclosures document in light of (i) the Annual Report; (ii) the ICAAP and its input; (iii) the internal liquidity adequacy assessment process (ILAAP) and its input; and (iv) its overall understanding of the Group's risk profile.

The Annual Report includes audited and unaudited disclosures addressing the Group's risk exposure, mitigation and appetites referred to in this document. In approving the Annual Report, the directors consider the appropriateness of those disclosures and the overall adequacy of the Risk Management Framework.

The Group went through its annual ICAAP during the year. The ICAAP was prepared under the direction of executive management, with appropriate input and challenge from other areas of the business. The ICAAP was reviewed and challenged by the Group's Risk Committee and was formally approved by the Board in September 2022. The Group completes an updated ICAAP on at least an annual basis.

Concluding in early 2023, the PRA has conducted a capital supervisory review and evaluation process (C-SREP) of the Group's capital requirements, based on the ICAAP approved in September 2022. The outcome is that the Group's total SREP own funds requirements as reported in the UK KMI table have reduced by more than a third, from 18.3% to 11.9%. Including the current regulatory combined buffers of 3.5% (capital conservation buffer of 2.5% and countercyclical buffer of 1.0%), the Group's overall capital requirement has reduced by 6.4% from 21.8% to 15.4%. The reduction in capital requirements partly reflects the Group's successful repositioning as a specialist banking group focused on lower risk customers, the receipt of the Core UK Group Waiver in November 2022 which enables the Group to leverage its retail deposit funding capabilities to fund its other lending products, and the significant amount of work undertaken to strengthen the Group-wide Risk Management Framework.

Future ICAAPs will be subject to C-SREP reviews periodically, particularly in the event of significant changes in the business.

## 2 Key metrics and overview of risk-weighted exposure amounts

This section sets out the Group's total risk-weighted exposure amount (RWEA) and its key capital and liquidity metrics.

### 2.1 UK OVI – Overview of risk-weighted exposure amounts

31 December £m		Risk-weighted exposure amounts (RWEAs)		Total own funds requirements
		a	b	c
		2022	2021	2022
1	<b>Credit risk (excluding CCR)</b>	<b>1,656.5</b>	1,595.0	<b>132.5</b>
2	Of which the standardised approach	<b>1,656.5</b>	1,595.0	<b>132.5</b>
3	Of which the foundation IRB (FIRB) approach	-	-	-
4	Of which the slotting approach	-	-	-
UK 4a	Of which equities under the simple risk-weighted approach	-	-	-
5	Of which the advanced IRB (AIRB) approach	-	-	-
6	<b>Counterparty credit risk (CCR)</b>	<b>23.0</b>	4.1	<b>1.8</b>
7	Of which the standardised approach	<b>12.1</b>	1.0	<b>1.0</b>
8	Of which internal model method (IMM)	-	-	-
UK 8a	Of which exposures to a CCP	-	-	-
UK 8b	Of which credit valuation adjustment (CVA)	<b>10.9</b>	3.1	<b>0.9</b>
9	Of which other CCR	-	-	-
10	Empty set in the UK			
11	Empty set in the UK			
12	Empty set in the UK			
13	Empty set in the UK			
14	Empty set in the UK			
15	<b>Settlement risk</b>	-	-	-
16	<b>Securitisation exposures in the non-trading book (after the cap)</b>	-	-	-
17	Of which the SEC-IRBA approach	-	-	-
18	Of which SEC-ERBA (including IAA)	-	-	-
19	Of which the SEC-SA approach	-	-	-
UK 19a	Of which 1,250%/deduction	-	-	-
20	<b>Position, foreign exchange and commodities risks (market risk)</b>	-	-	-
21	Of which the standardised approach	-	-	-
22	Of which IMA	-	-	-
UK 22a	<b>Large exposures</b>	-	-	-
23	<b>Operational risk</b>	<b>131.3</b>	141.5	<b>10.5</b>
UK 23a	Of which the basic indicator approach	-	-	-
UK 23b	Of which the standardised approach	<b>131.3</b>	141.5	<b>10.5</b>
UK 23c	Of which the advanced measurement approach	-	-	-
24	<b>Amounts below the thresholds for deduction (subject to 250% risk weight) (for information)</b>	<b>29.4</b>	32.1	<b>2.4</b>
25	Empty set in the UK			-
26	Empty set in the UK			-
27	Empty set in the UK			-
28	Empty set in the UK			-
<b>29</b>	<b>Total</b>	<b>1,810.8</b>	1,740.6	<b>144.8</b>

## 2 Key metrics and overview of risk-weighted exposure amounts continued

### 2.2 UK KMI – Key metrics template

£m		a	c	e
		31 Dec 22	30 Jun 22	31 Dec 21
<b>Available own funds (amounts)</b>				
1	Common Equity Tier 1 (CET1) capital	478.8	458.4	506.5
2	Tier 1 capital	478.8	458.4	506.5
3	Total capital	678.8	658.4	706.5
<b>Risk-weighted exposure amounts</b>				
4	Total risk-weighted exposure amount	1,810.8	1,681.7	1,740.6
<b>Capital ratios (as a percentage of risk-weighted exposure amount)</b>				
5	Common Equity Tier 1 ratio (%)	26.4	27.3	29.1
6	Tier 1 ratio (%)	26.4	27.3	29.1
7	Total capital ratio (%)	37.5	39.2	40.6
<b>Additional own funds requirements based on SREP (as a percentage of risk-weighted exposure amount)</b>				
UK 7a	Additional CET1 SREP requirements (%)	5.8	5.8	5.8
UK 7b	Additional AT1 SREP requirements (%)	1.9	1.9	1.9
UK 7c	Additional T2 SREP requirements (%)	2.6	2.6	2.6
UK 7d	Total SREP own funds requirements (%)	18.3	18.3	18.3
<b>Combined buffer requirement (as a percentage of risk-weighted exposure amount)</b>				
8	Capital conservation buffer (%)	2.5	2.5	2.5
UK 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	-	-	-
9	Institution specific countercyclical capital buffer (%)	1.0	-	-
UK 9a	Systemic risk buffer (%)	-	-	-
10	Global systemically Important Institution buffer (%)	-	-	-
UK 10a	Other systemically Important Institution buffer	-	-	-
11	Combined buffer requirement (%)	3.5	2.5	2.5
UK 11a	Overall capital requirements (%)	21.8	20.8	20.8
12	CET1 available after meeting the total SREP own funds requirements (%)	16.1	17.0	18.8
<b>Leverage ratio<sup>1</sup></b>				
13	Total exposure measure excluding claims on central banks	2,284.8	2,130.0	2,798.0
14	Leverage ratio excluding claims on central banks (%)	21.0	21.5	21.3
<b>Additional leverage ratio disclosure requirements<sup>2</sup></b>				
14a	Fully loaded ECL accounting model leverage ratio excluding claims on central banks (%)	n/a	n/a	n/a
14b	Leverage ratio including claims on central banks (%)	n/a	n/a	n/a
14c	Average leverage ratio excluding claims on central banks (%)	n/a	n/a	n/a
14d	Average leverage ratio including claims on central banks (%)	n/a	n/a	n/a
14e	Countercyclical leverage ratio buffer (%)	n/a	n/a	n/a

## 2 Key metrics and overview of risk-weighted exposure amounts continued

### 2.2 UK KMI – Key metrics template continued

		a	c	e
£m		31 Dec 22	30 Jun 22	31 Dec 21
<b>Liquidity coverage ratio<sup>3</sup></b>				
15	Total high-quality liquid assets (HQLA) (weighted value - average)	383.2	406.1	502.9
UK 16a	Cash outflows - total weighted value	110.7	108.8	150.8
UK 16b	Cash inflows - total weighted value	65.5	65.2	64.8
16	Total net cash outflows (adjusted value)	48.0	49.2	89.6
17	Liquidity coverage ratio (%) <sup>4</sup>	986.2	1,192.3	1,051.5
<b>Net stable funding ratio<sup>5</sup></b>				
18	Total available stable funding	2,322.9		
19	Total required stable funding	1,652.3		
20	NSFR ratio (%)	140.6		

In line with the UK KMI template instructions the disclosure of data for previous periods is not required when data is disclosed for the first time. This is a PRA fixed format template; therefore, cells not required have been left blank or indicated as not applicable.

- 1 Previous leverage ratio disclosures prior to 1 January 2022 did not exclude claims on central banks, with these taking effect after this date as per the PRA Rulebook; therefore, figures have been recalculated to provide comparative figures.
- 2 In line with the UK KMI template instructions only LREQ firms shall disclose values in rows 14a to 14e.
- 3 These measures are based on a 12-month rolling average of month-end positions.
- 4 This measure is based on a 12-month rolling average of month-end positions; therefore, it cannot be directly calculated from the values given above.
- 5 These measures are based on a four-quarter rolling average of quarter-end positions. PS17/21 'Implementation of Basel standards' states the first disclosures of the net stable funding ratio (NSFR) will not in practice be possible on this basis until after 1 January 2023 (para 13.103), when at least four quarters of reporting NSFR have been completed under CRR2 rules. The Group has interpreted this to mean the disclosure of 31 December 2022 average NSFR should be made. No disclosure of 30 June 2022 or 31 December 2021 has been made.

The Group has no Additional Tier 1 capital and as such there is no difference between the CET1 capital ratio and the Tier 1 capital ratio. A reconciliation between regulatory own funds to the balance sheet in the audited financial statements is not required by Article 433b; however, a reconciliation is set out in the financial and capital risk management section of the Annual Report.

Under Annex II to the Disclosure (CRR) Part of the Rulebook, information on the result of the Group's internal capital adequacy assessment process (Article 438(a) CRR) shall only be disclosed by institutions when required by the relevant competent authority. This has not been demanded from the Group.

## 2 Key metrics and overview of risk-weighted exposure amounts continued

### 2.3 Impact of IFRS 9 transitional arrangements

The following table sets out the key regulatory capital metrics on an IFRS 9 transitional basis and on a fully loaded basis (as if IFRS 9 transitional arrangements had not been applied), as at 31 December.

#### Impact of IFRS 9 transitional arrangements on key regulatory capital metrics

£m	31 Dec 22	31 Dec 21
<b>Available capital (amounts)</b>		
Common Equity Tier 1 (CET1) capital	478.8	506.5
Common Equity Tier 1 (CET1) capital as if IFRS 9 transitional arrangements had not been applied	424.6	398.1
Tier 1 capital	478.8	506.5
Tier 1 capital as if IFRS 9 transitional arrangements had not been applied	424.6	398.1
Total capital	678.8	706.5
Total capital as if IFRS 9 transitional arrangements had not been applied	624.6	598.1
<b>Risk-weighted exposures (amounts)</b>		
Total risk-weighted exposures	1,810.8	1,740.6
Total risk-weighted exposures as if IFRS 9 transitional arrangements had not been applied	1,793.8	1,706.7
<b>Capital ratios</b>		
Common Equity Tier 1 (CET1) ratio (%)	26.4	29.1
Common Equity Tier 1 (CET1) ratio as if IFRS 9 transitional arrangements had not been applied (%)	23.7	23.3
Tier 1 ratio (%)	26.4	29.1
Tier 1 ratio as if IFRS 9 transitional arrangements had not been applied (%)	23.7	23.3
Total capital ratio (%)	37.5	40.6
Total capital ratio as if IFRS 9 transitional arrangements had not been applied (%)	34.8	35.0
<b>Leverage ratio<sup>1</sup></b>		
Leverage ratio total exposure measure excluding claims on central banks	2,284.8	2,383.2
Leverage ratio total exposure measure as if IFRS 9 transitional arrangements had not been applied excluding claims on central banks	2,230.6	2,274.8
Leverage ratio excluding claims on central banks (%)	21.0	21.3
Leverage ratio as if IFRS 9 transitional arrangements had not been applied excluding claims on central banks (%)	19.0	17.5

<sup>1</sup> Previous leverage ratio disclosures prior to 1 January 2022 did not exclude claims on central banks, with these taking effect after this date as per the PRA Rulebook; therefore, figures have been recalculated to provide comparative figures.

All disclosures in the document are set out on an IFRS 9 transitional basis consistent with the position reported under the regulatory return process.



### 3 Risk management

Risk management is recognised as an integral component of good management and governance. In the context of the Group, it is critical to enable the Group to minimise losses while maximising business opportunities and positive outcomes for all key stakeholders including shareholders, customers, colleagues and regulators.

The Group Risk Management Framework (RMF) plays an important role in supporting the Group in implementing an integrated business strategy as well as collaboration of activities. The framework is based around an 'enterprise' approach enabling a 'single view of all risks and managing those risks in a consistent way up, down and across the enterprise' (as defined by the Institute of Risk Management). The Group RMF allows:

- risk to play a central and value-added role in the context of business strategy;
- greater focus on critical and strategic risks;
- entity-wide risk management;
- improved identification and definition of risk responsibilities;
- monitoring, measuring and calibration of risk in the context of risk appetite; and
- trade-off between upside and downside risk as well as uncertainty.

A comprehensive overview of the Group's risk management objectives, policies and governance arrangements is set out in the Governance section of the Annual Report. Replication of this disclosure has not been included in this document. The Group's Annual Report is published on the Group's corporate website, [www.vanquisbankinggroup.com](http://www.vanquisbankinggroup.com). The Pillar 3 document and the Annual Report are included in the same directory of the website and thus are considered to be delivered in the same medium.

## 4 Remuneration policies and practices

The Group is required to prepare Remuneration Code Pillar 3 disclosures in addition to the regulatory capital disclosures. These disclosures are set out below.

### Introduction

The following disclosure is made in accordance with the requirements of Article 450 of the Capital Requirements Regulation (CRR) and provides information regarding the remuneration policies and practices for staff identified in accordance with the PRA Rulebook and fifth iteration of the Capital Requirements Directive (CRD V) which collectively establishes qualitative and appropriate quantitative criteria to identify categories of staff whose professional activities have a material impact on the firm's risk profile.

### 4.1 UK REMA – Remuneration Policy

#### Governance

The Board of directors of Vanquis Banking Group plc (VBG) has delegated the responsibility for oversight of VBG's Remuneration Policy and the remuneration decision making process to its Remuneration Committee (RemCo).

The RemCo is comprised of three wholly independent non-executive directors, including the RemCo Chairman. The RemCo meets at least four times a year. The terms of reference for the RemCo have been approved by the VBG Board of directors. The RemCo's mandate is to:

1. Determine Remuneration Policy in relation to fixed and variable pay for all employees (including executive directors, senior management function holders, material risk takers and control function staff);
2. Provide oversight for the design and implementation of the Group's remuneration policy, which is subject to annual review by the Committees as well as an annual review by Internal Audit;
3. Ensure that remuneration outcomes appropriately reflect long-term performance and support effective risk management;
4. Determine which employees are material risk takers (Group Code Staff) for the purposes of the Remuneration Code. VBG operates criteria aligned to the PRA Rulebook and CRD V criteria:
  - i. Group executive directors and non-executive directors;
  - ii. Members of the Group's Executive Committee;
  - iii. Heads of EBA-identified functions and identified control function senior managers; and
  - iv. Selected roles which have a significant influence on the Group's risk profile including selected control functions.
5. Determine levels of fixed and variable pay for individual Group Code Staff and control functions;
6. Oversee the setting of bonus pools and the application of any ex-ante or ex-post risk adjustments;
7. Ensure that its decisions are consistent with an assessment of VBG's financial condition, future prospects and shareholder outcomes; and
8. Monitor that PFG's remuneration policies and practices remain fully compliant with the requirements of the PRA/FCA's Remuneration Code (CRD V).

VBG's dual regulated banking division, Vanquis Bank Ltd (VBL), operates a subsidiary-level remuneration committee, which, in coordination with the Group-level RemCo, is responsible for comparable areas of remuneration governance for VBL-employed material risk takers.

The Directors' Remuneration Report, which can be found in the 2021 Annual Report and Accounts, provides more information on the RemCo and the pay policy for VBG Directors.

Since June 2020, the RemCo has received advice on regulatory matters and executive remuneration from PricewaterhouseCoopers LLP ('PwC'), assisting in the determination of the Remuneration Policy.

#### Link between pay and performance

As a performance driven organisation VBG's Remuneration Policy ensures that the appropriate elements of fixed and variable reward are applicable to all roles across the Group. Variable remuneration for all annual bonus eligible colleagues is determined by an independently assessed balanced scorecard of financial, non-financial and risk objectives. VBG operates a rigorous performance appraisal process that includes assessment of both delivery and behaviour objectives, ensuring positive risk culture and risk management outcomes are underpinned by remuneration outcomes. As a PRA/FCA level three firm, the Group has the ability to disapply the use of deferral and instruments in variable pay however, Group Code Staff will receive a portion of variable remuneration in long-term incentives, using deferred restricted stock (Restricted Share Plan – RSP), to ensure a value at risk and the alignment of interests with shareholders. The current deferred restricted stock awards are not subject to formal performance criteria to qualify for vesting, however the RemCo performs a qualitative performance underpin review to ensure the vesting of stock awards is consistent with key performance considerations and the shareholder outcomes. The Directors' Remuneration Report, which can be found in the 2022 Annual Report and Accounts, provides more information on the deferred RSP.

## 4 Remuneration policies and practices continued

### 4.1 UK REMA – Remuneration Policy continued

#### Link between pay and performance continued

VBG operates an independent variable pay risk adjustment assessments both during the review of bonus funding and at the point of vesting of any deferred awards. These assessments form part of the Group's Variable Pay Risk Adjustment Framework which maintains the integrity between effective risk management outcomes and executive pay awards. These assessments consider whether variable pay funding should be reduced, or granted awards reduced or recouped, based on the profile of risk control and risk events experienced over the performance period the variable pay relates to. The Group's Malus and Clawback policy, which is applicable to the Company, operates in conjunction with these assessments and ensures that the Company has a legal capability to enforce the reduction or repayment of historical awards. Control functions are managed independently from the business units they oversee, and while the business area may provide feedback on performance as part of the normal performance management process, variable pay outcomes are generally weighted towards non-financial and individual performance objectives. Control functions also review the MRT identification criteria and annually reviews the Group remuneration policy.

Both fixed and variable remuneration for Group Code Staff across VBG are reviewed annually to ensure levels of reward are aligned with long-term business performance measures (including non-financial measures aligned to drive the right behaviours within the Group including Company values (our Blueprint), compliance, ethics, behaviour towards customers and risk management). The review takes into account individual performance and market competitiveness.

The RemCo continues to apply the CRD V provisions relating to the cap on the ratio of fixed to variable pay which are set out in Article 94(1g) of the Capital Requirements Directive (2013/36/EU) to all Group Code Staff and maintains a malus and clawback policy applicable to all Group Code Staff consistent with FCA and PRA rulebook expectations. Additionally, the Group applies the requirements of the PRA's Buy-out Regime.

### 4.2 UK REM1 – Remuneration awarded for the financial year

The following table sets out aggregate quantitative information on remuneration of Group Code Staff. Rows 1-16 of the UK REMA table only apply to proportionality level 1 or 2 banks and therefore have not been presented.

£m		a	b	c	d
		MB <sup>1</sup> supervisory function	MB <sup>1</sup> management function	Other senior management	Other identified staff
17	<b>Total remuneration</b>	22.23	-	-	5.82

<sup>1</sup> MB refers to the management body, in the Group's case, its Board of directors.

### 4.3 UK REM2 – Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff)

This template is only applicable to proportionality level 1 or 2 banks; therefore, this template has not been presented.

### 4.4 UK REM3 – Deferred remuneration

This template is only applicable to proportionality level 1 or 2 banks; therefore, this template has not been presented.

### 4.5 UK REM4 – Remuneration of 1m EUR or more per year

This template is only applicable to proportionality level 1 or 2 banks; therefore, this template has not been presented.

## 4 Remuneration policies and practices continued

### 4.6 UK REM5 – Information on remuneration of staff whose professional activities have a material impact on institutions’ risk profile (identified staff)

	a	b	c	d	e	f	g	h	i	j
	Management body remuneration			Business areas						
	MB supervisory function	MB management function	Total MB	Investment banking	Retail banking	Asset management	Corporate functions	Independent internal control functions	All other	Total
<b>1</b>	<b>Total number of identified staff</b>									<b>80</b>
2	50	30	80							
3				-	-	-	-	-	-	
4				-	-	-	-	-	-	
<b>5</b>	<b>Total remuneration of identified staff</b>									
6	22.23	5.82	28.05	-	-	-	-	-	-	
7	9.01	1.2	10.2	-	-	-	-	-	-	
	13.22	4.62	17.84	-	-	-	-	-	-	

## Abbreviations

ASA – Alternative standardised approach

ATI – Additional Tier 1

Bank – Vanquis Bank Limited

BCBS – Basel Committee on Banking Supervision

CCD – Consumer Credit Division

CCR – Counterparty credit risk

CET1 – Common Equity Tier 1

Company – Vanquis Banking Group plc (formerly Provident Financial plc)

CRD IV – Capital Requirements Directive and Regulation

CRR – Capital Requirements Regulation

C-SREP – Capital supervisory review and evaluation process

CVA – Credit valuation adjustment

EU – European Union

FCA – Financial Conduct Authority

Group – Vanquis Banking Group plc (formerly Provident Financial plc) and its subsidiaries

HQLA – High-quality liquid assets

ICAAP – Internal capital adequacy assessment process

ILAAP – Internal liquidity adequacy assessment process

LREQ – Leverage ratio requirements

NSFR – Net stable funding ratio

PRA – Prudential Regulation Authority

RMF – Risk Management Framework

RWEA – Risk-weighted exposure amount

SA – Standardised approach

T2 – Tier 2

VBG – Vanquis Banking Group plc (formerly Provident Financial plc)

VBL – Vanquis Bank Limited



**Vanquis Banking Group**

No. 1 Godwin Street  
Bradford  
BD1 2SU  
United Kingdom

+44 (0)1274 351 351

[www.vanquisbankinggroup.com](http://www.vanquisbankinggroup.com)

Company number 668987