

The Vanquis Banking Group plc statement on the Modern Slavery Act 2015

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Vanquis Banking Group plc and its operating companies during the year ending 31st December 2023, to prevent the possibility of modern slavery and human trafficking occurring within its direct operations and supply chains. All information and data provided below is based on the 2023 financial year unless otherwise stated.

Our business

Vanquis Banking Group plc and its product divisions (“the Group”) is a specialist lending business which focuses on the near prime and mid-cost credit markets, and operates across the United Kingdom (UK).

The total number of people employed by the Group as at 31 December 2023 stood at 1,524. Collectively, these colleagues serve 1.75 million customers in the UK. Vanquis Banking Group supplies credit cards, loans and saving products through the Vanquis brand, and vehicle finance through the Moneybarn brand. In 2023, the Group also acquired Snoop, a consumer-focused business that helps people spend, save and live smarter. The Group’s main offices are based in Bradford, Chatham, London and Petersfield.

The Group is committed to supporting and respecting human rights and, as such, is opposed to slavery and human trafficking in both its direct operations and in the indirect operations of its supply chains. As such, the Group will not knowingly support or do business with any organisation involved in slavery or human trafficking. This covers the suppliers of products and services that are engaged by the Group, as well as the charitable, community and civic society partners it supports. This commitment is underpinned by the Group’s corporate policy on Human Rights and Modern Slavery, which endorses the United Nation’s Universal Declaration of Human Rights and the International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work. The Group also acknowledges the United Nation’s Guiding Principles on Business and Human Rights as the recognised framework for the Group and its Divisions to respect human rights in their own operations and through their relationships with other key stakeholders (e.g. suppliers) and is a signatory to the United Nations Global Compact. This is supported by the Group’s Procurement Policy which further underlines the Group’s commitment to complying with the requirements of the Modern Slavery Act 2015 and ensuring that procurement decisions take account of other sustainability considerations.

Other corporate policies, which support this commitment include the Group’s Third Party Risk Management Policy, Health and Safety Policy, Whistleblowing Policy, Anti-Bribery and Corruption Policy, Inclusion and Diversity Policy, Recruitment and Selection Policy, and Background Checking Policy and Procedure.

The Group reported no incidents of modern slavery or human trafficking in 2023. However, we continue to review and update our policies and processes in line with our Risk Management Framework to ensure that we are aligned in our approach to combating modern slavery and human trafficking in our direct operations as well as in our supply chain.

The Group’s direct operations

In order to minimise the risk of modern slavery or human trafficking occurring within the direct operations of the Group (i.e. through the colleagues that are employed by the Group’s operating companies), a range of Human Resources processes and procedures are in place. Through these colleague onboarding processes and procedures, the Group collects evidence which shows that: a person being hired is the person they claim to be; the prospective colleague has the right to work legally in the UK; the person has permission to do the type of work that is being offered to them and that they are not a criminal. This evidence is assured by conducting checks using information held on the National Fraud Database and by credit reference agencies, as well as through the carrying out of criminal record and driving licence checks. Prospective colleagues are also required to provide proof of ‘right to work’ documents in line with the Immigration, Asylum and Nationality Act 2006 and original photographic documents, for example, a valid passport. Colleagues are also encouraged to raise concerns relating to potential breaches of regulations, policy requirements and/or other grievances, either by

contacting a line manager or by accessing the Group's whistleblowing helpline 'Safecall' which is a 24-hour helpline, which is operated by an independent third party to ensure impartiality and confidentiality.

Our supply chain

In 2023, the Group's total income was £488.8m and its annual procurement spend was £225m. Most of the Group's tier one suppliers are based within the UK. These suppliers range in size and scale from small and medium-sized enterprises, to large multinational corporations. The highest area of spend for the Group is on professional services (consultants, contractors, etc), postage, credit card processing, customer referrals, data centre hosting, credit score checking services and consultancy and legal fees. Other areas of high spend include software licenses and support, contractor sourcing and recruitment, outsource partners and property and facilities management.

The Group has well-established supplier due diligence processes and procedures to manage supply chain-based risks and ensure suppliers comply with the Group's policy requirements and meet legislative requirements including those that relate to the Modern Slavery Act 2015. Across the Group, all new suppliers are assessed for the types of potential risks they pose and are sent questionnaires covering issues such as financial stability, data protection, information security, business continuity, regulatory compliance and corporate responsibility (CR). Responses are assessed by subject matter experts. The CR questionnaire is sent to all materially important suppliers and includes establishing if the supplier's turnover exceeds £36m and if so, to attach links to their modern slavery policy. If the supplier's turnover is less than £36m they are asked to outline the processes they have in place to prevent instances of modern slavery and human trafficking arising in their supply chain and their direct operations. Throughout the relationships that we have with our suppliers there is ongoing dialogue, together with periodic reputational searches online. During 2023, a Business Owners Handbook and two e-learning modules were delivered to colleagues across the Group which, among other things, underlined the Group's commitment to protecting human rights and minimising the risk of modern slavery or human trafficking of occurring indirectly in the operations of the suppliers that are engaged.

The Group continues to be a signatory to the UK Government's Prompt Payment Code, which requires the business to pay suppliers within 60 days of receiving an invoice, and aim to pay all suppliers within 30 days of receiving an invoice.

The Group's future plans

In 2024, the Group will continue to take the steps described above and deliver e-learning modules to colleagues to ensure that they understand the due diligence processes that are in place, and the role they have to play in helping the business to identify and prevent instances of human trafficking and modern slavery.

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015, and it constitutes the Group's modern slavery statement for the financial year ending 31st December 2023. This Statement was approved by the Vanquis Banking Group plc Board on 26th March 2024 on behalf of the Group and it will be reviewed annually.

Ian McLaughlin
Chief Executive Officer
Vanquis Banking Group plc

March 2024