

Supplier Code of Conduct

Vanquis Banking Group plc

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Contents

SUPPLIER CODE OF CONDUCT 0

VANQUIS BANKING GROUP PLC 0

CONTENTS..... 1

INTRODUCTION 2

PURPOSE AND SCOPE 2

LEGAL AND REGULATORY STANDARDS..... 2

BUSINESS INTEGRITY AND ETHICAL BEHAVIOUR..... 3

HEALTH AND SAFETY..... 4

INCLUSION AND DIVERSITY 5

MODERN SLAVERY AND HUMAN RIGHTS 6

THE ENVIRONMENT 7

INFORMATION PHYSICAL SECURITY 8

DATA PROTECTION 8

BUSINESS CONTINUITY PLANNING..... 8

COMPLIANCE WITH OUR SUPPLIER CODE OF CONDUCT 8

REPORTING CONCERNS 9

Introduction

At Vanquis Banking Group (“Vanquis”), our values play an important role in enabling us to deliver on our Purpose to deliver caring banking so our customers can make the most of life’s opportunities. They commit us to care about people, pull together as a team, find a better way and get the right things done. They are also the guiding principles that everyone at Vanquis uses to guide the decisions we make and remind us what’s important when we’re working with our customers, our communities and each other.

Our values define our reputation, determine the behaviours we expect of our colleagues and shape how we do business. Vanquis aims to work with suppliers who align with our values and support our goals. We expect our suppliers to adhere to all relevant legislation and to act responsibly, fairly, ethically and safely at all times. These principles form an integral part of our sourcing activities and procurement decisions.

Purpose and Scope

The purpose of Vanquis’s Supplier Code of Conduct is to provide the principles and guidelines that we expect of our suppliers for establishing and maintaining strong business relationships with our business. Vanquis upholds a high standard of service across its supplier base and our Supplier Code of Conduct expresses our values and shares the key principles and best practice standards that we consider vital to sustaining effective and enduring relationships with our suppliers, their affiliates and subcontractors.

We expect our suppliers, their affiliates and subcontractors to be aware of, and comply with this, Code and to operate in accordance with values comparable to ours.

Legal and Regulatory Standards

Vanquis expects high standards of business conduct and ethical behaviour, which is demonstrated through consistent compliance with all applicable laws, rules and regulations relevant to the industry and countries in which we operate. We expect all our suppliers, their affiliates and subcontractors, to comply with all

applicable laws, rules, regulations and standards within the industries and countries in which they operate and we expect similar commitments throughout their own supply chain.

Business Integrity and Ethical Behaviour

Vanquis expects all our suppliers, their affiliates and subcontractors to behave ethically and with integrity in all business transactions. Specifically:

Bribery and Corruption

All our suppliers, their affiliates and subcontractors shall comply with all applicable national and international anti-corruption laws and regulations. If no such laws apply or are of a lesser standard to that prescribed in the UK Bribery Act 2010, suppliers, representatives and their employees must adhere to the UK Bribery Act 2010. They shall not (neither directly nor indirectly) offer, provide or accept anything of value to improperly influence an official act or to secure an improper advantage in order to obtain or retain business. This includes so-called facilitation payments or other benefits provided to public officials for routine non-discretionary actions.

Conflicts of Interest

In your relationship with our colleagues, suppliers, your affiliates and subcontractors, you must not try to gain improper advantage or preferential treatment due to relationships you may have with us or improperly impact a colleague's ability to make sound, impartial and objective decisions on behalf of Vanquis.

Money Laundering, Fraud and Financial Crime

All suppliers, their affiliates and subcontractors must comply with applicable laws and regulations designed to combat money laundering activities and prevent fraud. The supplier shall maintain financial records and reports according to applicable laws and regulations. The supplier must notify Vanquis in the event of fraud being committed, or attempted, by one of its employees whilst acting in their capacity as providing services for, or on behalf of, Vanquis.

Taxation

All our suppliers, their affiliates and subcontractors must comply fully with all their obligations in relation to all taxes due within the jurisdictions in which they operate. They must not participate in tax evasion or facilitate tax evasion by others. Specifically, we expect our suppliers, their affiliates and subcontractors to have contracts, policies, systems, and/or procedures in place to ensure that all who act for them or on their behalf, also comply with such obligation.

Gifts and Hospitality

All our suppliers, their affiliates and subcontractors must not offer or accept gifts or hospitality that may improperly influence – or create the appearance of improperly influencing their business decisions or those of Vanquis. Furthermore, the nature of any gifts or entertainment must not, by their quality, quantity or timing, be used by suppliers, their affiliates and subcontractors to gain improper advantage or preferential treatment from Vanquis colleagues.

Health and Safety

Vanquis is committed to providing a safe and healthy work environment. We expect our suppliers, their affiliates and subcontractors to also provide a safe and healthy work environment that complies with all relevant health and safety laws and provides a working environment, for employees and visitors, which minimises health and safety risks.

Where suppliers are working on our sites with our equipment, we expect them to comply with all health and safety training and guidance issued and to help maintain a safe working environment by reporting any issues promptly. Suppliers, their affiliates and subcontractors delivering a service using their own equipment, or servicing on-site equipment, must provide appropriate documentation in advance to demonstrate how health and safety issues will be managed.

Inclusion and Diversity

Vanquis strives to create an inclusive workplace culture that celebrates diversity. Our vision is for our colleagues to reflect the diversity of the communities we live and work in. We also expect our suppliers, their affiliates and subcontractors to:

- Abide by all relevant equality legislation in the countries in which they operate.*
- Be transparent, fair and consistent through any employment or hiring practices, ensuring there is no discrimination on the basis of age, sex or sexual orientation, gender identity, disability, origin, race, colour, religion or belief.*
- Embrace diversity, fairness and inclusion in their workforce/workplace.*
- Promote a working environment based on dignity, trust and respect, and one that is free from discrimination, sexual harassment, or victimisation by the provision of regular training to comply with the Worker Protection (Amendment of Equality Act 2010) Act 2023, or the Equality Act 2010 both as amended from time to time and any other similar or relevant legislation (together the “**Supplier Personnel Policies**”); and having processes and procedures in place that are regularly reviewed which deal with the steps a supplier has taken for its personnel to comply with Supplier Personnel Policies in the provision of services to Vanquis and any interaction with Vanquis personnel.*
- Comply with all applicable wage and working regulations and encourage suppliers to go beyond compliance with local minimum wages and, where applicable, pay a living wage to all direct employees and contractors. We also encourage our suppliers to support the adoption of the local living wage throughout its supply chain.*
- Have in place clearly defined disciplinary procedures which are effectively communicated to workers, and must offer employees a confidential whistleblowing procedure.*

Modern Slavery and Human Rights

Vanquis 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, we 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 we engage, as well as the charitable, community and civic society partners we support.

This commitment is underpinned by our 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. Vanquis also acknowledges the United Nation's Guiding Principles on Business and Human Rights as the recognised framework for us to respect human rights in their own operations and through their relationships with other key stakeholders (e.g. suppliers). This is supported by our Procurement Policy which further underlines our commitment to comply with the requirements of the Modern Slavery Act 2015 and ensure that our procurement decisions take account of other sustainability considerations.

We expect all our suppliers, their affiliates and subcontractors to act in accordance with the UK Modern Slavery Act 2015, if applicable, or any similar laws in the countries in which they carry out business to ensure that no one working in any supply chain is being exploited. We also expect them to act in accordance with the UN's Universal Declaration of Human Rights and the ILO's Declaration on Fundamental Principles and Rights at Work. In particular, we expect our suppliers, their affiliates and subcontractors to:

- Have policies in place that require their employees to adhere to all relevant regulation and legislation acting ethically and with integrity.*
- Treat their own employees fairly and ethically.*
- Support and encourage freedom of association and collective bargaining in line with local regulations.*

- *Comply with all applicable wage and working regulations and encourage suppliers to go beyond compliance with local minimum wages and, where applicable, pay a living wage to all direct employees and contractors. We also encourage our suppliers to support the adoption of the local living wage throughout its supply chain*
- *Demonstrate the procedure(s) in place and actions taken to identify, prevent and mitigate human rights violations such as modern slavery (including forced or child labour and human trafficking) in their operations and supply chain, notifying Vanquis of any identified concerns using the process detailed below and the measures taken to address them.*

The Environment

In January 2024, Vanquis made the commitment that 78% of its supply chain, by spend, will have set science-based targets by 2027. This means we will expect our material suppliers, whom we will notify, to set a science-based target by this date.

As such, we expect all suppliers to: Have a clear emission reduction strategy in place with comprehensive environmental policies and practices to support Vanquis' commitment; work with their own supply chains to minimise the environmental impact of the goods or services they provide; and provide annual updates of their progress to Schroders.

In addition, for all material suppliers, we expect them to: Measure Scope 1, Scope 2 and relevant Scope 3 emissions using the Greenhouse Gas Protocol and set near and long-term science-based targets to decarbonise business models; and establish transition plans to achieve these targets by a) reducing energy consumption and purchasing energy from renewable sources wherever possible and b) reducing consumption of natural resources and minimising waste through recycling and responsible waste disposal to promote a circular economy.

Information Physical Security

Vanquis expects any information received by a supplier, their affiliates and subcontractors from Vanquis to be held securely with appropriate technical and organisational security in place to safeguard that information to ensure there is no disclosure of the data to any other party without our permission.

Vanquis expects suppliers, their affiliates and subcontractors to ensure that they do not put in peril Vanquis' physical security and assist us in providing a safe working environment for all our staff, customers, and visitors.

Data Protection

Vanquis expects suppliers, their affiliates and subcontractors to comply with all applicable data protection requirements. Where a supplier is processing personal data on Vanquis' behalf, the supplier must enter into appropriate contractual terms governing such data processing (including, among other things, in relation to appointment of sub-processors, audit rights and transfers of personal data outside the UK or European Economic Area (EEA)), in each case as required by applicable data protection laws.

Business Continuity Planning

Vanquis expects suppliers to be prepared for any disruptions of its business (e.g. natural disasters, terrorism, supply chain disruptions, communicable disease outbreaks – epidemics or pandemics, information security issues, cyber-attacks). This preparedness includes business continuity plans that protect both employees as well as the environment from the effects of possible serious disruptions that may arise within the domain of operations.

Compliance with our Supplier Code of Conduct

Vanquis expects suppliers to perform effective due diligence procedures on their affiliates and subcontractors to ensure they confirm agreement with this Supplier Code of Conduct. Adherence and commitment to this Supplier Code of Conduct forms an integral part of Vanquis' sourcing and monitoring activity and is used along with all other relevant decision criteria when (i) selecting new suppliers; (ii)

renewing current contractual relationships; or (iii) monitoring incumbent supplier relationships. Failure to comply with our Supplier Code of Conduct and/or local laws and regulation may result in termination as a Vanquis supplier.

Reporting Concerns

Vanquis encourages anyone who wishes to report any violations from what is outlined in this Supplier Code of Conduct. To do this, or if you have any questions regarding this Supplier Code of Conduct, please contact: Group Procurement group.procurement@vanquis.com.

Version Control

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