

Anti-Bribery and Corruption Policy

Tier 1 Policy

- Version: 3.1
- Updated: December 2025
- This is a Customer and Conduct Risk policy

Policy Governance	
Policy Owner	Compliance Director and MLRO
Executive Owner	Chief Risk Officer
Approver	Board
Date of Approval	December 2025
Version	3.1
Date Effective	December 2025
Related Policies and Procedures	<p>Associated Policies and Frameworks:</p> <ul style="list-style-type: none"> • Anti-Money Laundering, Counter Terrorist Financing, Proliferation Financing and Sanctions Policy • Gifts and Hospitality Policy • Fraud Policy • Prevention of Tax Evasion and Facilitation of Tax Evasion • Procurement Policy • Third Party Risk Management Policy • People Policy • Data Protection Policy • Whistleblowing Policy • Risk Management and Internal Control Framework • Policy Governance Framework • Vehicle Finance Broker Oversight Framework
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 line manager or People team who will make appropriate arrangements to support you through the process.

Contents

CONTENTS.....	2
PURPOSE	3
SCOPE	3
LEGAL AND REGULATORY REQUIREMENTS	3
KEY POLICY PRINCIPLES	4
MONITORING	8
POLICY GOVERNANCE.....	8
VERSION CONTROL.....	9
APPENDIX 1: KEY DEFINITIONS	11
APPENDIX 2: SIX PRINCIPLES OF BRIBERY	12

Purpose

This Policy outlines the governance, risk management and standards adopted by Vanquis Banking Group (“Vanquis” or the “Group”) to prevent bribery and corruption. It is designed to ensure compliance with applicable legal and regulatory obligations and promote ethical conduct.

Vanquis has zero tolerance for bribery and corruption. Offering, giving, soliciting or receiving bribes, whether directly or indirectly, is strictly prohibited. Bribery includes:

- Offering or receiving money, gifts, hospitality or other advantages to influence a business decision;
- Facilitating payments to expedite routine government actions; and
- Donations or sponsorships intended to improperly influence outcomes.

These risks may arise from:

- Group colleagues, including any temporary or fixed-term workers;
- Arrangements with parties acting on behalf of the Group in the delivery of their products and services;
- Other third parties with whom Vanquis engages for its general commercial operations; and
- Any customer relationship.

Scope

This policy applies to the following entities, inclusive of all products, within Vanquis:

1. Vanquis Banking Group Plc;
2. Vanquis Bank Limited (“VBL”);
3. Moneybarn Limited;
4. Moneybarn No1 Limited;
5. PFG Corporate Services Ltd;
6. Snoop Ltd; and
7. Cheque Exchange Limited (“CEL”).

This policy applies to all colleagues, contractors and third parties (including suppliers, intermediaries, agents and outsourced service providers) across Vanquis and its subsidiaries, regardless of seniority or function.

See Appendix 1 for key terms or phrases used throughout this policy.

Legal and Regulatory Requirements

This policy is designed to comply with the UK Bribery Act 2010 in respect of Vanquis’ conduct both in the UK and internationally (inclusive of where Vanquis’ outsourced partners or

suppliers are based), which prohibits businesses, individuals and parties acting on their behalf from engaging in bribery. The Bribery Act must also be adhered to by anyone who acts on behalf of Vanquis regardless of their location.

Government guidance from the UK Ministry of Justice identifies six principle focus areas for commercial organisations like Vanquis to support implementation of the UK Bribery Act 2010 and prevent bribery (see Appendix 2).

Key Policy Principles

1. Governance:

Bribery and Corruption Risk Appetite

- Vanquis will conduct all its business in an honest and ethical manner. It must operate proportionate and effective systems to counter bribery and corruption.
- No accounts must be kept 'off book' or in any way facilitate or conceal traces of bribery or corruption.
- Vanquis to ensure that the 6 principles of bribery and corruption established by the UK Ministry of Justice (set out in Appendix 2) are followed as well as any relevant guidance that has been issued by regulators or advisory groups such as FATF and Wolfsberg.
- As instructed by senior management and the Board, this Policy strictly prohibits any employee of Vanquis, any Group Entities (including those who are regulated or non-regulated), and Third Parties acting on behalf of Vanquis (or any of its legal entities) to offer, promise, give, request, or accept a bribe. This is a criminal offence, and individuals found guilty can be punished by up to ten years' imprisonment and/or a fine. If Vanquis fails to prevent bribery, it could face regulatory action and / or criminal proceedings leading to sanctions up to and including unlimited fines, exclusion from tendering for public contracts, and material reputational damage.
- Any employee of Vanquis or any of its legal entities who offers, promises, gives, requests, or accepts a bribe (or procures someone else to do so on their behalf) will be dealt with under the firm's disciplinary procedures which can result in actions up to, and including, dismissal and regulatory sanction.

Bribery and Corruption Risk Assessment

- A bribery and corruption risk assessment must be completed in line with the documented assessment methodology.
- This risk assessment must be updated at least annually and presented to the senior management forum having financial crime representation each time there is a material change, or annual review completed and track any actions identified within the assessment.

MLRO Oversight and Reporting

- The Group MLRO will report to Group Risk Committee twice annually, one of which will include the submission of the annual MLRO report covering each of the Regulated

Entities including reporting on behalf of the CEL MLRO. This report will cover key risks, issues, and action plans which the Group MLRO believes to warrant recognition by senior leaders.

Report of Bribery and Corruption

- All Group Colleagues are required to raise concerns about any issue or suspicion of bribery or corruption at the earliest possible stage.
- If an employee is offered a bribe, or is asked to make one, or if they believe or suspect that any bribery, corruption, or other breach of this Policy has occurred or may occur, they must report it to the Group Money Laundering Reporting Officer. CEL colleagues are to report to CEL MLRO. The incident must be reported as soon as possible and should be no more than 24 hours after the bribery incident. Colleagues may also report them to the Whistleblowing Officer, in accordance with the Whistleblowing Policy as soon as possible. If they are reported to the Whistleblowing Officer, then on receipt, they must report such incidents to the Group MLRO in accordance with the Group Whistleblowing Policy and associated procedures.
- If a colleague is unsure about whether a particular act constitutes bribery or corruption, they should raise it with the Group MLRO to seek clarification.

2. Gifts and Hospitality:

- The Group Gifts & Hospitality Policy must detail the Bank's stance on giving and receiving gifts and hospitality including:
 - A prohibition on giving and receiving of cash or other types of monetary instrument, including vouchers.
 - A prohibition on giving and receiving of any gift or hospitality to / from any political party, politician or other politically affiliated individual or entity.
 - A prohibition on any specific gift or hospitality (i.e., an event) or several / frequent gifts or hospitality which may appear to be lavish or excessive.
 - The financial thresholds for the giving or receiving of gifts and hospitality and the levels of management approval they require prior to being offered or accepted, and
 - The procedure for seeking approvals for receiving or offering Gifts and Hospitality.
- Any Group Colleague who becomes aware of any of the potential risk scenarios set out in Appendix 2 must report the matter to the Policy Owner or the contacts in Appendix 3 immediately.

3. Third Parties: Vanquis could be liable for actions of others, involving bribery and corruption, acting on its behalf, therefore committed to their compliance.

- Third Party contracts and outsourcing arrangements must include specific provisions on compliance with anti-bribery and corruption legislation. Where the Third Party does not agree to include any Vanquis specific anti-bribery and corruption provisions, any non-standard terms and conditions will need to be approved by a representative of the Vanquis Legal Counsel before any such changes are accepted or implemented within the Third-Party contracts. The Financial Crime team may be contacted for advice or

guidance as required. If the third party is permitted to subcontract part of the services for which they are contracted, the third party retains overall accountability for complying with this Policy.

- Appropriate due diligence must be carried out before Third Parties are onboarded. The level of due diligence may vary depending on the financial crime risk, including bribery, associated to the Third-Party relationship. The MLRO will document a risk-based approach for completing Supplier Due Diligence. This will outline:
 - The minimum level of due diligence checks that must be completed for all suppliers.
 - Circumstances or risk factors that would mean a supplier is considered high risk and should be subject to enhanced due diligence. The checks that must be completed for any high-risk suppliers.
 - The frequency at which this due diligence must be completed, including any trigger events.
- All suppliers must be subject to PEP and Sanctions screening and be monitored periodically to identify any changes. Due to an increased bribery and corruption risk associated to brokers within Vehicle Finance, additional controls may be required with these relationships. These activities will be outlined within the Vehicle Finance Broker Oversight Framework.
- Similarly, CEL Agents or retailers who may be a sole trader, company or partnership firm who may need additionally scrutiny prior to on-boarding and on an on-going basis as set out in the CEL AML Policy separately.
- Where Vanquis establishes a relationship with an intermediary which is likely to pose a higher risk of bribery including those who act specifically on behalf of Vanquis to find, introduce, obtain, or maintain business or any other commercial advantage, due diligence should additionally include:
 - Documented business necessity and scope of the engagement.
 - Adverse media searches on:
 - The company
 - All entities and individuals within the ownership structure of the company as per the unwrapping process outlined above.
 - All persons with the authority to exercise significant control of the company.
 - Confirmation from the intermediary that they have been notified of, understand, and agree to be bound by Vanquis anti-bribery and corruption risk appetite.
 - Including clauses within the contract stating:
 - A prohibition on all types of bribery and corruption
 - An acknowledgement that the firm have appropriate ABC policies and procedures in place.
 - A termination clause for acts of bribery and corruption
- The business owner of the Third-Party relationship is to assess the nature of the services and / or goods being received from the Third Party, and whether there are any bribery risks. The Financial Crime team can be contacted for advice and guidance on any ABC risks using the contact details in Appendix 3.

4. Sponsorship and Donations: Any sponsorships and donations (“S&Ds”) provided by Vanquis must not be used as a subterfuge for bribery.

- Vanquis may provide financial support to communities, charities, or other entities in line with its social purpose and associated policies. They may also promote themselves and their business offerings through marketing sponsorships. These sponsorships and donations (“S&Ds”) must not be used as a subterfuge for bribery.
- It is prohibited for Vanquis to make S&Ds to any political party, politically exposed person (“PEP”), any event controlled or run by a PEP, or any company controlled or owned by a PEP. Vanquis must not make any S&Ds at the request of a PEP, and any such requests must be referred to the Group MLRO at the contact details provided in Appendix 3. Vanquis only makes charitable donations and undertakes sponsorship activities that are legal and ethical under local laws and practices.
- Vanquis makes Charitable Donations through appointed community partners. All Donations must be subject to required approval process. Community partners involved in such transactions must be subject to standard supplier due diligence process.
- Similarly, Sponsorship payments made by Vanquis must be subject to appropriate due diligence and approvals adhering to the policy requirements.

5. Recruitment: Offers of employment or other paid or unpaid work experience, such as internships, could be used to commit bribery therefore strict controls must in place to curb them.

- With respect to all recruitment practices, the following must be in place within the respective People Policies and Procedures:
- Vanquis must operate a consistent and merit-based recruitment process. Where a candidate is referred through the employee referral scheme, the colleague referring is not permitted to be involved in the recruitment process. This includes any referrals from ExCo and Board members, including the Non-Executive Directors.
- Referrals for employment are not accepted from any public official, or any representative of a public official.

6. Training:

- All Applicable Colleagues must complete annual Bribery and Corruption including the Gifts and Hospitality training in line with the Training Policy. Training may be required more frequently if there are significant changes to risk profile, operations, products, or regulations. New joiners must complete the training as part of their onboarding.
- The MLRO is responsible for the training content which must cover relevant laws and regulations, personal obligations and consequences of non-compliance, identity and contact details of the MLRO and MLNO, red flags and suspicious activity indicators and reporting procedures for suspicious activity.
- MLRO monitors the completion of the training and event of delay could lead to colleague’s system access removal leading to further actions following the Group’s disciplinary procedures.

The MLRO may also determine specific roles or individuals who have heightened financial crime risk exposure and require more tailored training. MLRO to decide when such assessments are to be undertaken.

7. Record Keeping:

- Vanquis must retain all records including all the Group and their entity transactions, payments and expenses in accordance with the Group Data Retention Policy. Records must be legible, of good quality and readily retrievable. All records must include audit trails so they can be reviewed as necessary to evidence the nature of a relationship. Specific record keeping requirements may also be set out in other procedures, manuals and processes supporting the objectives of this Policy, including in relation to Procurement processes and Gifts and Hospitality.
- The Group MLRO must be permitted access to all records for their entity, with no restrictions, to perform their role and fulfil their regulatory duties.

Monitoring

The following monitoring controls are in place to support the effectiveness of the policy:

- Identified bribery and corruption risks and controls are documented on Riskconnect and assessed and monitored in line with **the Risk Management and Internal Control Framework**. Risks outside of tolerance are escalated to Collections, Recoveries and Fraud Committee and monitored until risk exposure is back within appetite.
- Risk events, policy breaches and control ineffectiveness are escalated to the Collections, Recoveries and Fraud Committee and tracked to resolution in a timely manner.
- Performance against the bribery and corruption risk appetite metrics and supporting key risk indicators are monitored with breaches or trends toward breaches escalated to the Collections, Recoveries and Fraud Committee to monitor.
- Second and Third Lines of Defence provide independent and risk-based oversight and assurance, in line with the **Integrated Assurance Framework**.

Policy Governance

This policy is governed as per the requirements set out in the Policy Governance Framework, which provides a structured process with clear roles and responsibilities for the development, review and oversight of policies within Vanquis' Policy Hierarchy to support policy embedding and ongoing management.

Roles and Responsibilities

The RACI matrix below details the Anti-Bribery and Corruption policy roles and responsibilities:

Task/Activity	Roles						
	1LoD	2LoD			3LoD	Governing body	
	Financial Crime Operations	MLRO	2 nd Line Risk Team	CRO	Internal Audit	Collections, Recoveries & Fraud Committee	Board Risk Committee
Policy development & review	C	A	R	I	I	C	C
Policy approval	I	R	R	C	I	C	A
Policy communication & implementation	R	A	R	I	I	C	I
Policy monitoring	C	A	R	I	I	I	I
Policy attestation	I	A	R	I	I	C	C
ABC framework development & implementation	C	A	R	C	I	I	I
ABC risk assessment	C	A	R	C	I	C	I
ABC risks identification & management	C	A	R	I	I	C	I
Oversight of governance, risk management & controls	C	C	R	A	I	C	I
Risk-based independent assurance	C	C	C	C	A	I	I

RACI key:

R: Responsible	Assigned to complete the task/activity.
A: Accountable	Has final decision-making authority for task/activity completion. Only one per task.
C: Consulted	An adviser, stakeholder or SME who is consulted prior to a decision/action.
I: Informed	Must be informed post decision/action.

Policy Non-Compliance

This is a mandatory policy for Vanquis; however, it is recognised that waivers and exceptions are sometimes necessary. Where a policy user is unable or potentially unable to comply with a particular element of the policy, a breach, waiver or exception must be raised in accordance with the Policy Governance Framework. Unreported breaches or policy non-adherence may result in disciplinary action.

Policy Attestation

Policy owners must conduct an annual policy attestation of adherence and effectiveness at the point of policy reapproval.

Version Control

Version No.	Reason for Change	Approved by	Date Approved
1.0	New Group-wide policy	Group Risk Committee	May-23

2.0	Annual refresh	Board Risk Committee	May-24
3.0	Annual refresh	Board Risk Committee	May-25
3.1	Change of policy template	Compliance Director & MLRO	Dec-25

Appendix 1: Key Definitions

Under UK law, the criminal offence of bribery occurs where:

- an offer, promise or giving of an advantage;
- directly or indirectly;
- to another person; or
- intending that a person is rewarded for, or induced to, perform a relevant function or activity improperly.

An advantage includes money, gifts, loans, fees, hospitality, services, discounts, and the award of a contract or anything else of value. The UK Bribery Act also specifically makes it a criminal offence to bribe a foreign public official anywhere in the world.

A person acts improperly where they act illegally, unethically, or contrary to an expectation of good faith or impartiality, or where they abuse a position of trust. The improper acts may be in relation to any business or professional activities, public functions, acts in the course of employment, or other activities by or on behalf of any organisation of any kind.

Appendix 2: Six Principles of Bribery

The six principles for preventing bribery according to UK Ministry of Justice are:

1. **Proportionate Procedures** – Vanquis’ anti bribery procedures must be proportionate to the bribery risks faced by Vanquis and to the nature, scale and complexity of the business model. Vanquis must have procedures which are clear, practical, accessible, effectively implemented and enforced.
2. **Top-Level Commitment** – Vanquis’ Board of Directors and Executive Committee are committed to preventing bribery by persons associated with the Bank. A ‘zero-tolerance to bribery and corruption’ culture is promoted by the Board and Executive Committee and demonstrated in their behaviours.
3. **Risk Assessment** – Vanquis must periodically assess and document the nature and extent of its exposure to potential external and internal risks of bribery and corruption, in line with its approved risk assessment methodology. Appropriate risk-based assessment must be applied in the selection of third party providers and charitable initiatives.
4. **Due Diligence** - Vanquis must apply robust due diligence procedures, taking a risk-based approach in respect of persons performing services on its behalf or employed by it. Vanquis has a Procurement policy and procedures in place intended to prevent offences under the Bribery Act 2010 being committed. Vanquis must undertake appropriate screening of its colleagues and parties providing services to it against adverse media, which would highlight any specific previous convictions for criminal offences, including bribery and corruption offences.
5. **Communication and Training** – Vanquis must ensure that its bribery prevention policies and procedures are embedded and understood through internal and external communication, ensure anti-bribery and corruption training is mandatory and periodically delivered to all applicable colleagues.
6. **Monitoring and Review** – Bribery and corruption are risks which fall within the definition of “Financial Crime” and as such must be subject to the Financial Crime risk management framework, which includes quality monitoring and quality assurance, compliance monitoring activity and Internal Audit reviews.

