

Health and Safety Policy

Tier 1 Policy

- Version: 1.0
- Updated: February 2026
- This is an Operational Risk Policy

Policy Governance	
Policy Owner	Senior Health & Safety Manager
Executive Owner	Chief Operations Officer
Approver	Board
Date of Approval	31/03/2026
Version	1.0
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Related Policies and Procedures	<p>Associated Policies and Frameworks:</p> <ul style="list-style-type: none"> • Operational Resilience Policy • Procurement Policy • Third Party Risk Management Policy and Framework • People Policy • Data Protection Policy • Inclusion and Diversity Policy • Whistleblowing Policy • Environmental and Climate Change Risk Policy • Policy Governance Framework • Risk Management and Internal Control Framework <p>Associated Standards and Procedures</p> <ul style="list-style-type: none"> • Accident Reporting and Investigation Standard • Building Operations Maintenance Standard • Construction Design Management Standard • Contractor Management (H&S) Standard • Control of Hazardous Substances Standard • Display Screen Equipment Standard • Driving at Work Standard • Fire Safety Management Standard • First Aid & AED Standard • Health and Safety Contractor Management Standard • Lone Working Standard • Manual Handling Standard • Mental Health & Wellbeing Standard • Performance Monitoring & Evaluation Standard • Personal Emergency Evacuation Plan Standard • Personal Protective Equipment Standard • Risk Assessment Standard • Working at Height Standard
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.

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Purpose

Health and safety (“H&S”) is integral to the success of the business and Vanquis Banking Group (“Vanquis” or “the Group”) recognises its duty to comply with H&S legislation, codes of practice and relevant standards or guidelines.

Vanquis is committed to achieving high standards of H&S in relation to all of its colleagues, those affected by its business activities and those attending its premises. The Group demonstrates its commitment by defining roles, allocating responsibilities and delegating authorities to facilitate effective H&S management.

The policy defines the governance, risk management and controls that underpin the effective management of H&S across the Group.

Scope

This policy applies to all colleagues working at all levels and across all products within Vanquis, including senior managers, officers, directors, non-executive directors, shareholders, employees, job applicants, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers, casual and agency colleagues and volunteers (collectively referred to as ‘Colleagues’ in this policy). The business areas covered in the policy encompass:

- Vanquis Banking Group plc
- Cheque Exchange Limited (CEL)
- Vanquis Bank Limited (VBL)
- USnoop Limited (Snoop)

Legal and Regulatory Requirements

This policy has been written to ensure compliance with H&S legislation, codes of practice and any relevant standards or guidelines:

- Health and Safety at Work etc Act 1974
- Management of Health and Safety at Work Regulations 1999
- Workplace (Health, Safety and Welfare) Regulations 1992
- The Health and Safety (Display Screen Equipment) Regulations 1992
- The Manual Handling Operations Regulations 1992 amended 2002
- The Regulatory Reform (Fire Safety) Order 2005
- RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013)
- Personal Protective Equipment at Work (Amendment) Regulations 2022 (PPER 2022)
- COSHH (Control of Substances Hazardous to Health) 2002
- The Provision and Use of Work Equipment Regulations 1998 (PUWER)
- The Work at Height Regulations 2005
- The Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)

Key Policy Principles

The key policy principles (“principles”) below set out the responsibilities and expectations of all colleagues to meet Vanquis’ H&S commitments:

1. **Effective Governance Structure:** H&S will be governed by clear ownership and approval structures to ensure legal and regulatory compliance.

- The Health and Safety Steering Group (HSSG) is established to support the Board to discharge its responsibilities for health, safety and welfare of its colleagues and stakeholders. The HSSG is responsible for planning, reviewing and implementing health and safety policy, standards, systems and practices. Full responsibilities are detailed within the HSSG’s terms of reference.
- Standards, procedures, objectives and guidelines are in place to control work activities and hazards, which align to the requirements of ISO:45001. These will be maintained and kept up to date, including version control.
- Colleague Forums will be established to provide colleagues the opportunity to be involved in the development, implementation and operation of safe workplace practices. The People team will facilitate these meetings and summarise the outputs in minutes.

2. **Training and Awareness:** Effective and proportionate H&S communication, training and awareness will be cascaded to all colleagues to understand their responsibilities and obligations.

- Mandatory H&S Essentials and H&S Toolkit e-learning will be provided annually for colleagues via MyLearning to raise awareness of H&S responsibilities.
- Further H&S training needs identified for specific roles will be provided to colleagues to carry out their duties in a safe manner. Records of training status and completion will be retained.
- H&S policy, standards and guidelines will be made available to all colleagues on the intranet.
- H&S noticeboards will be available in all office locations and provide various information e.g. Employee Assistance Provider, first aiders, emergency evacuation plans/routes.
- The H&S Law Poster will be available in all office locations, providing an overview of key responsibilities, H&S contact and what to do in the event of a H&S concern.

3. **Risk Management:** H&S risks will be identified, assessed, measured, managed, monitored and reported.

- All tasks, environments, equipment and substances will be risk assessed where significant hazards are identified, to ensure they are adequately controlled, and risks reduced to acceptable levels.
- H&S risk controls will be regularly assessed to ensure they are within risk appetite and minimise the risk to the business.
- Changes in relevant H&S legislation/regulations will be monitored and incorporated into policies, standards and guidelines as required, to effectively manage risks.
- Complex tasks will be reinforced with a method statement. A methodology for hazard identification and risk assessment is provided in the management system

4. Contractor Management: The Group will recognise its responsibilities for the health, safety and welfare of all contractors working on its premises or on behalf of the Group.

- Supplier and contractor responsibilities will be recorded by Procurement and allocated an Account Manager to manage day to day.
- Contractors visiting Vanquis sites will be inducted prior to commencement of work to be advised of potential hazards/risks with further information provided covering controls and emergency procedures. Records of induction will be retained.
- The Contractor Management (H&S) Standard will detail how the contractors will be controlled, with support from the Procurement policy.

5. Performance Monitoring: Performance measurement will be implemented to assess how the Group is operating against its H&S objectives and targets.

- H&S performance data, including accidents and incidents and reporting metrics will be monitored and reviewed for trends, implementing corrective/preventative actions, to achieve continual improvement. Issues will be escalated to the HSSG and tracked until appropriately resolved.
- H&S audits and review outcomes will be reported to and monitored by the HSSG.
- The Annual H&S report will provide an overview and assurances of the adequacy of the health and safety arrangements and performance in Vanquis for the previous year. Content is to include key H&S activities, accident/incident trends and H&S plans and priorities for forthcoming year.

Monitoring

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

- Identified health and safety reporting 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 the COO and HSSG and monitored until risk exposure is back within appetite.
- Risk events, policy breaches and control ineffectiveness are escalated to the COO and HSSG and tracked to resolution in a timely manner.
- Performance against the H&S reporting risk appetite metrics and supporting key risk indicators are monitored with breaches or trends toward breaches escalated to the COO and HSSG 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 provides specific Health & Safety reporting roles and responsibilities:

Task/Activity	Roles									
	1LoD				2LoD		3LoD	General Counsel	Governing body	
	CEO	COO	H&S Team	All Colleagues	Operational Risk	CRO	Internal Audit	Legal	HSSG	Board
Policy development & review	A	C	R	I	C	I	I	I	C	I
Policy approval	I	R	R	I	I	I	I	I	C	A
Policy communication & implementation	I	A	R	R	I	I	I	I	C	I
H&S regulatory compliance	A	R	R	I	I	I	I	I	C	I
Annual H&S report	R	C	R	I	I	I	I	I	I	A
H&S risks identification & management	C	A	R	R	I	I	I	I	C	I
Oversight of governance, risk management & controls	I	C	C	I	R	A	I	I	I	I
Risk-based independent assurance	I	C	C	I	C	I	A	I	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

The policy owner 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 policy created to replace policy statement, in line with revised Policy Governance Framework.	Board	31/03/2026