

Inclusion and Diversity Policy

Tier 1 Policy

- Version: 3.0
- Updated: March 2026
- This is an Operational Risk policy

Policy governance	
Policy owner	Senior Manager Leadership, Culture and Engagement
Executive owner	Chief People Officer (“CPO”)
Approver	Nomination and Governance Committee
Date of approval	30 March 2026
Version	3.0
Date effective	1 April 2026
Related policies and procedures	<p>Associated Policies and Frameworks:</p> <ul style="list-style-type: none"> • Policy Governance Framework • Risk Management and Internal Control Framework • Third Party Risk Management Policy and Framework • People Policy <p>Associated Standards and Procedures:</p> <ul style="list-style-type: none"> • Grievance Procedure • Reasonable Adjustments Procedure • Recruitment & Selection Procedure • Mental Health & Wellbeing Procedure • Flexible Ways of Working Procedure • Colleague Privacy Notice • Whistleblowing Policy • Hybrid Working Procedure
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 a member of the People team who will make appropriate arrangements to support you through the process.

Contents

- PURPOSE3**
- SCOPE3**
- LEGAL AND REGULATORY REQUIREMENTS3**
- KEY POLICY PRINCIPLES4**
- MONITORING6**
- POLICY GOVERNANCE7**
- ROLES AND RESPONSIBILITIES7**
- POLICY NON-COMPLIANCE8**
- POLICY ATTESTATION8**
- VERSION CONTROL8**

Purpose

Vanquis is committed to creating and promoting an inclusive, safe and positive workplace that is free from discrimination and supports equality, enabling all colleagues to thrive, feel valued and contribute to sustainable business success.

This policy sets out the principles and expectations for the effective management of Inclusion and Diversity (“I&D”), promoting positive behaviours and outcomes. It has been developed to ensure a consistent, transparent and proactive approach that supports Vanquis’ commitment. All colleagues are expected to comply with this policy. Any breaches will be addressed in line with our behavioural expectations and disciplinary processes.

By embedding this policy into everyday practice, including in the composition and functioning of our Board and its committees, we aim to strengthen colleague engagement, foster a culture of belonging and contribute to Vanquis’ wider strategy on inclusion, wellbeing and responsible business. A diverse Board enhances Vanquis’ ability to reflect stakeholder perspectives, challenge constructively and make better decisions in pursuit of our strategic goals.

Scope

This policy applies to all colleagues, contractors, agency workers, and third-party suppliers working across the Vanquis Banking Group (“Vanquis”) and its subsidiaries, regardless of role, location or seniority. It is relevant to all aspects of employment, including recruitment, development, performance and day-to-day working practices.

For clarification, Vanquis comprises of:

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

The policy is designed to guide inclusive behaviours, decision-making and culture across the organisation. It applies in all settings where work-related activities take place, including virtual environments, external events and interactions with customers or partners.

Exclusions:

- **Product-specific or digital inclusion requirements** are covered under the Customer Risk policy.
- **Supplier Diversity** is managed separately under the Procurement Policy.

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

Legal and Regulatory Requirements

This policy has been written to comply with:

- **Equality Act 2010** – Prohibits discrimination, harassment, and victimisation based on protected characteristics and underpins inclusive employment practices, promoting fairness and equal opportunity in all employment decisions.
- **Gender Pay Gap Reporting Regulations** – Requires organisations with 250+ employees to publish annual gender pay gap data, promoting transparency and accountability in pay equity.
- **Health and Safety at Work Act 1974** – Supports the creation of a safe and respectful working environment, free from harassment, bullying, and risks to physical and mental wellbeing.
- **UK Corporate Governance Code (2024)** – Requires boards to promote inclusive culture, consider diversity in succession planning, and report on diversity and inclusion outcomes as part of good governance.
- **FCA Listing Rules on Board Diversity** – UK-listed companies must disclose annually whether they meet specific board diversity targets on a comply or explain basis, supporting transparency and representation at senior levels.
- **General Data Protection Regulation (GDPR)** – Ensures that all personal and diversity-related data is collected, stored, and used lawfully, ethically, and transparently. Vanquis upholds GDPR principles of privacy, consent, and data minimisation in all inclusion-related data practices.
- **Human Rights Act 1998** – Embeds fundamental rights into UK law, including the right to dignity, privacy, freedom of expression, and protection from discrimination. These principles underpin Vanquis’s commitment to respectful treatment, fair processes, and inclusive workplace culture, and are reflected across its inclusion policies and practices.

Key Policy Principles

These principles guide how I&D is embedded across all roles, settings and employment practices, ensuring that inclusive behaviours and decision-making shape our culture and operations.

1. Inclusive Culture

- **Dignity and Respect** - We are committed to a workplace culture rooted in dignity, respect, and legal compliance. Discrimination, harassment, or bullying will not be tolerated.
- **Equal Opportunities and Positive Action** - We ensure employment decisions are based on merit and free from bias, while actively promoting diversity and applying positive action where underrepresentation is identified, in line with the Equality Act 2010
- **Belonging and Mutual Respect** - We foster an inclusive environment where colleagues feel a genuine sense of belonging. We recognise the importance of intersectionality, how overlapping identities such as age, race, gender, sex, disability, sexuality, and socio-economic background shape lived experiences.

- **Open Dialogue and Psychological Safety** - We encourage and support open dialogue and the freedom to express ideas, feedback, and concerns without fear of judgment or retaliation.
- **Speaking Up and Accountability** - We promote a culture where colleagues feel empowered to call out inappropriate or exclusionary behaviour. We ensure that concerns are taken seriously, addressed promptly, and used to inform continuous improvement. We have frameworks and processes in place to address any workplace concerns raised through the Whistleblowing or Grievance procedure

2. Fair and Inclusive Practices

- **Equitable Policies** - We consistently and regularly review all policies to ensure they are equitable, transparent, and aligned with its values, business objectives, and legal obligations under the Equality Act 2010, Human Rights Act 1998, and other relevant legislation.
- **Inclusive Talent Practices** - Inclusive principles are applied to colleague recruitment, retention, development, reward and recognition. These practices are designed to advance equality of opportunity and eliminate bias.
- **Accessibility and Reasonable Adjustments** - We provide reasonable adjustments to support accessibility for colleagues with specific needs, in line with legal obligations. People Managers are responsible for ensuring adjustments are implemented effectively, consistently, and in a timely manner.

3. Leadership and Governance

- **Board Oversight and Accountability** - The Board is responsible for overseeing our I&D strategy and ambitions, including it and its Committees diverse composition based upon recommendations from the Nomination and Governance Committee.
- **Strategic Approval Process** - Any material changes to our I&D approach, including shifts in ambition, strategy, or supporting plans must be formally approved by the Executive Committee, noted by the Inclusion Steering Forum, and ratified at Board level.
- **Inclusive Leadership Representation** - Diversity is actively considered in Board and senior appointments and their succession plans to ensure representation and inclusive decision-making, which is overseen by the Nomination and Governance Committee. Vanquis applies an intersectional lens and aligns with FCA targets and the HM Treasury Women in Finance Charter, including setting internal goals, appointing accountable executives, and linking executive pay to progress.
- **Monitoring and Reporting** - The Board tracks progress against inclusion goals and reports key outcomes in the Annual Report and Accounts (“ARA”) to ensure transparency and regulatory alignment.
- **Governance Integration** - Inclusion is embedded in our governance and risk frameworks. Senior leaders are accountable for integrating inclusion into core processes and ensuring third-party compliance with the Equality Act.

4. Training and Awareness

- **Mandatory Training** - All colleagues are required to complete mandatory I&D training. This training forms part of our commitment to fostering an inclusive workplace and is monitored for completion and compliance. Senior leaders are accountable for

ensuring inclusion is reflected in core people processes, including fair access to training, development and career progression.

- **Tailored Learning for Leaders** - We provide targeted training for managers and senior leaders, covering inclusion-related topics and emphasizing their responsibilities, including legal obligations under the Equality Act.
- **Awareness and Education** - Inclusion topics are delivered through workshops, peer learning, and internal communications, shaped by colleague feedback. Content is regularly reviewed to ensure relevance, impact, and legal compliance

5. Data and Measurement

- **Data Collection and Analysis** - We collect and analyse diversity data in compliance with legal, regulatory and ethical standards. Data is collected with colleague consent, stored securely, and used transparently to monitor compliance with the Equality Act.
- **Identifying Gaps and Strategic Action** - We use diversity data to identify gaps in inclusion and representation, including intersectional insights into how overlapping identities affect colleague outcomes. Targeted actions and initiatives are developed to address these gaps and support equality across all identity groups.
- **Reporting and Benchmarking** - I&D metrics, including gender pay gap data, are published annually and included in our ARA. Performance is benchmarked against FCA diversity targets, relevant accreditations, and ESG frameworks, with progress shared with the Board, senior leadership, and the Inclusion Community.
- **Colleague Survey** - An annual survey assesses inclusion outcomes and sentiment. Results are analysed by the People function, reviewed through the lens of I&D, and discussed with the Inclusion Community to inform strategic planning and drive continuous improvement.

6. Colleague Engagement and Advocacy

- **Colleague Networks and Leadership Sponsorship** – We support colleague-led networks, ‘known as affinity groups’ which are established to promote inclusion, empowerment, and representation. Each network is sponsored by an Executive Committee member to ensure visibility, advocacy, and strategic alignment.
- **Feedback and Experience Sharing** - Colleagues are encouraged to share feedback and lived experiences. Feedback is gathered through roundtables with the senior leadership team, forums, live events, discussions threads and surveys to inform ongoing strategy and support the aim of fostering good relations across diverse groups.

Monitoring

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

- Identified I&D 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 CPO and monitored until risk exposure is back within appetite.

- Risk events, policy breaches and control ineffectiveness are escalated to the CPO and Nomination and Governance Committee and tracked to resolution in a timely manner.
- Performance against the I&D targets, risk appetite metrics and supporting key risk indicators are monitored with breaches or trends toward breaches escalated to the Nomination and Governance Committee and CPO 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 I&D roles and responsibilities:

Task/Activity	Roles							
	1LoD		2LoD		3LoD	General Counsel	Governing body	
	CPO	Senior Manager Leadership, Culture and Engagement	2LoD Risk Team	CRO	Internal Audit	Legal	Nomination and Governance Committee	Board
Policy development & review	A	R	C	I	I	I	C	C
Policy approval	R	R	I	I	I	I	A	C
Policy communication & implementation	A	R	I	I	I	I	I	I
Policy monitoring	A	R	C	I	I	I	I	I
Policy attestation	A	R	C	C	I	I	I	I
I&D strategy oversight	R	R	I	I	I	I	C	A
I&D risks identification & management	A	R	C	C	I	I	I	I
Oversight of governance, risk management & controls	C	C	R	A	I	I	I	I
Risk-based independent assurance	C	C	I	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	HRDs	January 2022
2.0	Incorporate Board policy to create single I&D policy	Nomination Committee	September 2022
2.1	UK Corporate Governance Code changes		July 2024
3.0	Annual refresh and alignment with Tier 1 Policy governance.	Nomination and Governance Committee	October 2025

Appendix 1

Glossary of Terms

Accessibility

Ensuring environments, systems, and communications are usable by all individuals, including those with disabilities or specific needs.

Belonging

A sense of being accepted, valued, and included within a group or organisation, regardless of background or identity.

Bullying

Persistent, offensive, abusive, intimidating, or insulting behaviour that undermines an individual's confidence and dignity. It may be physical, verbal, or psychological.

Colleague Networks

Voluntary, colleague-led groups that support inclusion, representation, and community-building across shared identities or interests.

Discrimination

Unfair or unequal treatment of individuals or groups based on protected characteristics such as race, gender, age, disability, religion, or sexual orientation. It is prohibited under the Equality Act 2010.

Diversity

The presence of differences within the workforce, including but not limited to race, gender, age, disability, sexual orientation, socio-economic background, and religion.

Equity

Fair treatment, access, and opportunity for all individuals, recognising that different people may need different support to achieve equal outcomes.

Executive Committee (ExCo)

The senior leadership team responsible for strategic decision-making and oversight within the organisation.

FCA Diversity Targets

Regulatory diversity goals set by the Financial Conduct Authority to improve representation in financial services leadership.

Gender Pay Gap Reporting

The legal requirement to publish the difference in average earnings between men and women across an organisation.

Harassment

Unwanted conduct related to a protected characteristic that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating, or offensive environment.

HM Treasury Women in Finance Charter

A government initiative encouraging financial services firms to commit to gender diversity in senior leadership, including setting targets and linking executive pay to progress.

Inclusion

Creating an environment where all individuals feel respected, supported, and able to contribute fully, regardless of their background or identity.

Inclusion Community

A cross-company group of colleagues and Executive Sponsors who support the development and delivery of the organisation's Inclusion & Diversity strategy.

Intersectionality

A framework recognising how overlapping social identities (e.g. race, gender, disability) can create unique experiences of discrimination or privilege.

Positive Action

Positive action refers to lawful measures under the Equality Act 2010 that organisations can take to help individuals from disadvantaged or underrepresented groups overcome barriers, access opportunities, and achieve equitable outcomes. It is distinct from positive discrimination, which is unlawful in the UK.

Psychological Safety

A workplace culture where individuals feel safe to speak up, share ideas, and raise concerns without fear of negative consequences.

Reasonable Adjustments

Changes or accommodations made to support individuals with disabilities or specific needs, enabling equal access and participation.

Representation

The presence of diverse individuals across all levels of the organisation, particularly in decision-making roles.

Stakeholders

Individuals or groups with an interest in the organisation's performance and practices, including colleagues, customers, regulators, and investors.

Sustainability Indices / ESG Frameworks

External benchmarks used to assess an organisation's performance on environmental, social, and governance (ESG) criteria, including diversity and inclusion.

Appendix 2 - Our Board and Senior Management Team

Vanquis is committed to fostering an inclusive and diverse workplace where different backgrounds, perspectives, and experiences are valued. We believe that diversity strengthens decision-making, reduces the risk of groupthink, and enables us to better serve our customers and communities. The Board fully supports this culture and aims to reflect the communities in which we operate.

Commitments:

- **Gender Representation:** Vanquis aims to meet the FCA UK Listing Rule targets by achieving a minimum of **40% female representation on the Board** and ensuring that **at least one senior position** (Chair, Chief Executive Officer, Senior Independent Director, or Chief Financial Officer) is held by a woman.
- **Ethnic Diversity:** In line with the Parker Review, Vanquis aims to maintain **at least one Board member from an ethnically diverse background**, excluding white ethnic groups.
- **Women in Finance Charter:** Vanquis is a signatory to HM Treasury's Women in Finance Charter and committed to achieving its gender diversity targets in senior management.

Principles

All Board appointments and succession plans will be based on merit and objective criteria, while promoting diversity, inclusion, and equal opportunity. The Board recognises the benefits that diversity in all its forms brings to effective governance.

Governance

The Board Nomination and Governance Committee:

- Reviews and assesses Board composition and recommends new appointments.
- Oversees annual evaluations of Board effectiveness, including diversity representation and skills balance.
- Considers diversity when identifying candidates, alongside independence, experience, and knowledge.
- Develops a diverse pipeline for Board succession.

Measurable Objectives

The Nomination and Governance Committee will agree measurable objectives annually and recommend them to the Board for adoption. Current aspirational targets reflect the recommendations of the **FTSE Women Leaders Review** and the **Parker Review**.

Disclosure

Vanquis will disclose annually, **in line with FCA Listing Rules**, the diversity data for the Board and Executive Committee, including gender and ethnicity representation, using the prescribed format.