

## Valleys to Coast Housing Group Regulatory Framework - Compliance Improvement Plan November 2025

Valleys to Coast demonstrates a strong commitment to coregulation and continuous improvement. While we comply with a significant number of areas we have identified 2 areas where we are broadly compliant but have an action plan in place and a number of areas where we are driving continuous improvements

| Regulatory Standard                                             | Area of Improvement         | Action                                                                                                                              | Responsible Senior Person                                     | Delivery Target |
|-----------------------------------------------------------------|-----------------------------|-------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------|-----------------|
| <b>Broadly Compliant - improvement actions</b>                  |                             |                                                                                                                                     |                                                               |                 |
| <b>RS8a</b>                                                     | <b>Stock Condition Data</b> | Investment in new data team and roll out of whole stock survey programme to accelerate stock condition inspections.                 | Catherine Edwards<br>(Director of Assets and Sustainability ) | Q4 2027         |
| <b>RS9a</b>                                                     | <b>WHQS Compliance</b>      | Delivery of WHQS Investment plan, overseen by WHQS Investment Taskforce, to target full compliance by March 2028.                   | Catherine Edwards<br>(Director of Assets and Sustainability ) | March 2028      |
| <b>Compliant with identified Continuous Improvement Actions</b> |                             |                                                                                                                                     |                                                               |                 |
| <b>RS2b</b>                                                     | <b>Cyber Security</b>       | Enhance email security and Secure Web Gateway technologies; undertake a cyber incident response exercise with 3rd party assistance. | Matt Lucas<br>(Director of Technology, Digital and Data)      | Q3 2025/26      |

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|-----------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|
| <b>RS3b</b>                                                     | <b>Tenant Satisfaction</b>                                                                             | Service Standards to be developed and implemented with colleagues and customers to improve communication.                                                                     | Natalie Taylor<br>(Director of Customer Excellence)                                                                                             | Q3 2025/26                                |
| <b>RS4a</b>                                                     | <b>Tenant involvement</b>                                                                              | Engage the Customer Panel to evaluate our customer and community voice commitment within the next 12 months.                                                                  | Natalie Taylor<br>(Director of Customer Excellence)                                                                                             | End Q2 2026/27                            |
| <b>RS6a</b>                                                     | <b>Communicating Value for Money (VfM)</b>                                                             | The link between financial efficiencies and social impact needs clearer articulation for external audiences.                                                                  | Tony Smith<br>(Director of Finance)                                                                                                             | September 2026                            |
| <b>Code of Governance <i>Continuous Improvement Actions</i></b> |                                                                                                        |                                                                                                                                                                               |                                                                                                                                                 |                                           |
| <b>1.5.5</b>                                                    | <b>Environmental Sustainability &amp; Carbon Footprint</b>                                             | <p>Implement and Embed the Sustainability Reporting Standard.</p> <p>Embed refreshed Carbon footprint baseline into our Asset Strategy with a SMART objective action plan</p> | <p>Huw Lewis<br/>(Executive Director Finance &amp; Corporate Services)</p> <p>Catherine Edwards<br/>(Director of Assets and Sustainability)</p> | <p>Qtr 4 2026/27</p> <p>Qtr 1 2026/27</p> |
| <b>3.7.1</b>                                                    | <b>Board members understand their safeguarding responsibilities and go beyond the legal minimum to</b> | Safeguarding training to be delivered to the Board end of Q2 2026/27                                                                                                          | Safeguarding training to be delivered to the Board External facilitator                                                                         | Q2 2026/27                                |

|              |                                                                                                                                                                                                                                           |                                                                                                                                                                     |                                                                 |                |
|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|----------------|
|              | <b>promote a culture in which everyone feels safe and respected.</b>                                                                                                                                                                      |                                                                                                                                                                     | before end of Q2 2026/27                                        |                |
| <b>4.5.1</b> | <b>The board regularly reviews which matters are reserved to the board and which can be delegated.</b>                                                                                                                                    | Reflect on the efficacy of the revised framework and amend, as required.                                                                                            | Director of Governance and Assurance                            | End Q1 2026/27 |
| <b>4.7.3</b> | <b>The board puts in place and regularly reviews the organisation's process for identifying, prioritising, escalating and managing risks and, where applicable, the organisation's system of internal controls to manage these risks.</b> | Review the Risk Management Policy within the first 12 months to ensure that implementation learnings are captured and incorporated effectively, as may be required. | Director of Governance & Assurance & Risk and Assurance Partner | July 2026      |