

Provision of Banking Services – Information Request

9 August 2023

SECTION 1 - SUMMARY

- 1. Firm name
- 2. Relevant FRN(s)
- 3. Total number of customers (for each year half)
 - i. Personal
 - ii. Business
- 4. Total number of accounts opening applications (for each year half)
 - i. Personal
 - ii. Business

PLEASE NOTE: The following question numbering will vary between the personal and business sections.

SECTION 2 - BUSINESS JUSTIFICATION (PERSONAL & BUSINESS SECTIONS)

- 5. Number of customers whose accounts have been denied, suspended, or terminated for the following reasons: (for each year half)
 - a) Customer Expression of political or any other opinions
 - b) Customer Reputational risk
 - c) Financial Crime Suspicion identified
 - d) Financial Crime Due diligence concerns
 - e) Commercial Costs of serving or complying with financial crime requirements
 - f) Commercial Geographic (decisions taken not to serve certain customer locations)
 - g) **Business only:** Commercial market led decision. E.g., concerns about the financial health of the sector or market share deemed too high
 - h) Account Related Not meeting account criteria (e.g., small business using personal account; customer not using account as intended excl. financial crime)
 - i) Account Related Dormant account
 - j) **Business only:** Account Criteria Specific concerns about the financial viability of the account holder or customer
 - k) Customer Conduct Unacceptable behaviour towards the bank
 - I) Other [If >0] Please explain (Free text 3000 characters)
 - m) Total
- 6. Where not identified as the principal reason (in the previous question), the number of customers whose accounts have been denied, suspended, or terminated where an 'expression of political or any other opinion' was a factor in the decision (for each year half)

SECTION 3 - COMPLAINTS (PERSONAL & BUSINESS SECTIONS)

- 7. Number of customers who complained about their account being denied, suspended, or terminated, broken down by the following reasons: (for each year half)
 - a) Customer Expression of political or any other opinions
 - b) Customer Reputational risk
 - c) Financial Crime Suspicion identified
 - d) Financial Crime Due diligence concerns
 - e) Commercial Costs of serving or complying with financial crime requirements
 - f) Commercial Geographic (decisions taken not to serve certain customer locations)
 - g) **Business only:** Commercial market led decision. E.g., concerns about the financial health of the sector or market share deemed too high

- h) Account Related Not meeting account criteria (e.g., small business using personal account; customer not using account as intended excl. financial crime)
- i) Account Related Dormant Account
- j) **Business only:** Account Criteria Specific concerns about the financial viability of the account holder or customer
- k) Customer Conduct Unacceptable behaviour towards the bank
- 1) Other [If >0] Please explain (Free text 3000 characters)
- m) Total

SECTION 4 - CUSTOMER TYPES (PERSONAL & BUSINESS SECTIONS)

- 8. For the customer groups below please specify the number of customers as of 30 June 2023.
 - a) Politically Exposed Persons (PEPs)
 - b) Political parties
 - c) Not-for-profits & non-profits Charities, clubs, administrations, unions, etc
 - d) Adult entertainment industry
 - e) Pawn brokers
 - f) Money services business / Payments firms / E-money firms
 - g) UK expats living overseas
 - h) Digital Asset Businesses (incl. crypto assets)
 - i) Trustees
 - j) Refugees
 - k) Previously bankrupt
 - I) Ex-offenders
- 9. Please specify how many customers have applied, been denied, suspended, or terminated for the following groups below: (for each year half)
 - a) Politically Exposed Persons (PEPs)
 - b) Political parties
 - c) Not-for-profits & non-profits Charities, clubs, administrations, unions, etc
 - d) Adult entertainment industry
 - e) Pawn brokers
 - f) Money services business / Payments firms / E-money firms
 - g) UK expats living overseas
 - h) Digital asset businesses (incl. crypto assets)
 - i) Trustees
 - j) Refugees
 - k) Previously bankrupt
 - I) Ex-offenders
 - m) Any other customer groups you identify in your customer records [If >0] Please set out which groups, the applicable policies, and the rational. (Free text 3000 characters)

SECTION 5 - POLICIES AND PROCEDURES (PERSONAL & BUSINESS SECTIONS)

- 10. Do you have any policies that set out specific groups of customers that are excluded from the provision of services by your bank? (Y/N)
 - a. [If yes] Please set out which groups, the applicable policies, and the rational. (Free text 3000 characters)
- 11. Do you have any other policies, guidances, or risk appetites, which result in groups of customers being excluded? (Y/N)
 - a. [If yes] Please set out which groups, the applicable policies, and the rational. (Free text 3000 characters)
- **12.** Additional context or commentary (Free text 3000 characters)