

# NatWest Group Financial Crime Statement

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# NatWest Group Financial Crime Statement

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## 1. Introduction

NatWest Group is a financial services company providing a range of products and services to personal, commercial, large corporate and institutional customers. We are a UK-centred bank with our headquarters in Edinburgh but also support our customers to access international markets in Europe, Asia and the U.S.

Our purpose is to [champion potential, helping people, families and businesses to thrive](#). This lies at the core of our activity as we strive to create long term, deeper relationships with our customers.

Our actions to tackle financial crime are intrinsically linked to Our Purpose and reflected in [Our Values](#). We strive to play our role in tackling financial crime which can do untold harm to our customers and the communities which we serve.

## 2. Our Approach

[At NatWest Group, we understand that tackling financial crime is the right thing to do, not just because legislation tells us to do.](#) Our approach to preventing financial crime seeks to tackle the harm generated, as well as supporting compliance with relevant financial crime legislation and regulation in the jurisdictions in which we operate. NatWest's approach to compliance with financial crime legislation and regulation considers not only the letter, but also the spirit, of applicable laws and regulation.

[NatWest Group is not willing to tolerate actions and activities breach systemically or repeated Money Laundering, Terrorist Financing, Sanctions, Bribery and Corruption, Tax Evasion and Fraud laws and regulations.](#)

Our approach to financial crime is built on the following pillars:

- Policies and procedures - to ensure that our business seeks to prevent, identify and address financial crime as a result of our operations, products, services, our customers and suppliers
- Regular risk assessments – to ensure we align and continue to strengthen procedures in line with our inherent risks
- Due diligence – to enable us to understand our customers
- Colleague and customer training and awareness activity – so that everyone understands the role they play in tackling financial crime
- Systems and controls – to manage the risk presented
- Independent Audit – to continuously assess the effectiveness of our controls

We also recognise that to tackle financial crime we cannot do this in isolation. We work collectively with other organisations, industry bodies, law enforcement, regulators and government. Our activities include:

- Active member of the Joint Money Laundering Intelligence Taskforce, Joint Fraud Taskforce and various Transparency International Groups.
- Active member of the Public Private Partnership Economic Crime Reforms
- Active member of UK Finance Economic Crime Committees and a range of industry activities to tackle financial crime
- Founding members of the Authorised Push Payments Contingent Reimbursement Model.
- Participation in several indices and benchmarks which help to inform our activity and identify opportunities to continually improve our approach.

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Further details on our approach for each financial crime area can be found in the sections below.

### 3. Scope

This statement applies to all functions, franchises, legal entities and wholly and majority-owned legal entities within NatWest Group globally. A full list of our subsidiaries can be found in our Annual Report and Accounts.

### 4. Our Culture

Our culture is underpinned by our code of conduct which supports our colleagues to achieve the best outcomes for our customers by adhering to ethical standards. The Code includes a “Yes Check” decision-making framework which helps our colleagues to use good judgement and act with integrity, openness and fairness, when dealing with our customers, pursuing business opportunities and when awarding business.

### 5. Our Financial Crime Programme

The cornerstone of our financial crime programme is a suite of policies designed to comply with the legal and regulatory requirements relating to Anti-Money Laundering/Counter Terrorist Financing, Anti-Bribery and Corruption, Anti-Tax Evasion, Sanctions and Fraud. The bank also has surveillance and whistleblowing policies in place.

These policies set the minimum mandatory control requirements, which must be adhered to by all franchises and functions, globally. Compliance with our policies and procedures is monitored across NatWest Group using the three lines of defence model - Risk Management, Risk Oversight and Audit.

#### 5.1 Anti-Bribery and Corruption (ABC)

Bribery and corruption can have devastating impacts causing economic harm and undermining human rights. It can reduce the availability, quality and accessibility of goods and services, exacerbating poverty and marginalising certain groups in society. **NatWest Group is firmly committed to acting with integrity, fairness, conducting appropriate due diligence when pursuing business opportunities and when awarding business.**

Responsibility for the ABC programme rests with the Board of Directors of NatWest Group Plc who promote and encourage a policy of no tolerance towards actions and activities that knowingly breach bribery and corruption regulations, laws and disregard for the ABC Policy.

NatWest Group has policies and procedures in place designed to comply with the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act 1977 as well as locally applicable laws and regulations.

**NatWest Group will not tolerate the offering, giving, promising or receiving of improper monetary or other inducements, or any other inappropriate practice which might be perceived to improperly influence a person’s conduct in their professional or public duty.**

We aim to promote transparency with our stakeholders, including our customers, vendors and other third parties with whom we conduct business. NatWest Group takes the opportunity to communicate our expectations that those associated with NatWest Group conduct business in a fair and ethical manner and have controls in place to comply with ABC legal and regulatory requirements.

Our commitment to ethical behaviour and conduct means that our approach to ABC compliance reflects not only the letter, but also the spirit, of the applicable laws and regulation. This is a hallmark of the NatWest Group culture and reflects 'Our code; which defines our culture of ethical behaviour and pledge to Serve our Customers and Do the Right Thing'.

NatWest Group ABC policies and mandatory procedures cover our colleagues, and our relationships with third parties (including suppliers, sponsorships and charities) and our customers, and are designed to apply to all businesses and staff globally. NatWest Group requires compliance with these obligations whenever a person is acting for or on behalf of the NatWest Group.

We provide training on ABC, including mandatory annual online learning, to help to upskill colleagues on the key areas of the Group's ABC framework.

We have, and continue to, invest in technology with a range of portals to enable activities to be captured, pre-approved, and where necessary escalated and subject to oversight.

NatWest Group's ABC Programme addresses the key ABC risk and includes but is not limited to:

#### Colleagues

- A Group-wide threshold and pre-approval process for our gifts and hospitality in relation to the offering and accepting including the requirement to keep accurate records.
- Requirement that the hiring, for paid or unpaid, temporary or permanent roles, is not used to influence a business decision or to gain an advantage for NatWest Group.
- Prohibition on the provision of facilitation payments including the implementation of policies and procedures within each business to prevent payments being made.
- Delivery, tracking and monitoring effectiveness of ABC training appropriate to role and jurisdiction.
- Any breaches identified in relation to staff are dealt with under the Bank's policies and procedures.
- Ensuring individuals can confidentially report suspicions of bribery and corruption through Suspicious Activity Reporting (SARs).
- A Speak Up Policy to ensure individuals can confidentially report suspicions of bribery and corruption via an independent, confidential service through various channels available 24/7.
- The Bank seeks to protect individuals should they suffer any form of reprisal (including harassment, victimisation or discrimination) as a result of raising a genuine concern. The mistreatment of anyone raising a concern will be viewed as a disciplinary matter.
- Senior Management have responsibility for the ABC Programme and endorse that NatWest Group operates a policy of zero tolerance to bribery or corruption.

#### Third Parties

- Conducting the appropriate level of ABC Due Diligence on third parties with whom NatWest Group is engaging including Associated Parties defined by the Bank as persons and entities who perform services for or act on behalf of the NatWest Group.
- Specifying the where appropriate ABC contract clauses are required in written agreements and requirements for the on-going management of Associated Party relationships.

- When pursuing business opportunities (Mergers and Acquisitions) and when awarding business NatWest Group completes due diligence and assessment of risk when engaging in these activities. It has a zero-tolerance policy to bribery and corruption during the procurement process.
- Businesses dealing with suppliers must adhere to the NatWest Group [Supplier Charter](#), which sets out our commitment to conducting business with our suppliers in a fair and honest manner and with openness and integrity.

#### Strategic

- Regular risk assessments of all NatWest Group businesses to identify and mitigate potential bribery or corruption risks. Including but not limited to corporate donations, charitable activities and sponsorships, political activities, commercial sponsorships, mergers, acquisitions, joint ventures and other investment/divestment relationships.
- Enhanced due diligence conducted on higher risk activities.
- Prohibitions of the payment of political contributions on NatWest Group's behalf.
- Engagement in political activities with public officials through lobbying, and the recruitment of staff from the Public Sector ('Revolving Door') is transparent and is not, and cannot be perceived to be, seeking to bribe another person or entity with the intention of securing any form of improper business advantage; or influence governmental actions. Further details of how NatWest Group manages political activities can be found [here](#).
- Performing monitoring and assurance activity including by both internal and external audit to ensure that our procedures, systems and controls are adequately designed and operating effectively. Following audit completion remediation activities are completed as required.
- Participating in cross industry initiatives to tackle bribery and corrupt practices

#### 5.2 Anti-Tax Evasion (ATE)

NatWest Group recognises that tax evasion can have a devastating impact causing societal and economic harm. We have no appetite for knowingly facilitating tax evasion. This includes our employees and those that act on behalf of NatWest Group. NatWest Group's approach to ATE compliance involves not promoting any products or services, nor facilitating our customers' transactions, which produce tax results that are contrary to the spirit of the applicable tax law

We have an ATE programme in place that is designed to comply with all our legal and regulatory obligations. This approach is driven from senior management down throughout the NatWest Group. Responsibility for the ATE programme rests with the Board of Directors of NatWest Group Plc. who promote and encourage a policy of no tolerance towards actions and activities that knowingly facilitate tax evasion, and activities that breach tax regulations, laws and disregard ATE policy.

We intend to only deal with customers, suppliers and other Associated Parties who are tax compliant and our ATE programme is designed to ensure that we do not knowingly facilitate any transactions that seek to circumvent or abuse tax laws. We expect the reasonable assistance of our customers and suppliers with our due diligence.

We take a risk-based approach to identifying and preventing tax evasion and we maintain procedures to safeguard against our Associated Parties from knowingly facilitating tax evasion.

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NatWest Group ATE policies and mandatory procedures cover our colleagues, the NatWest Group Board of Directors and Executive Committee and are designed to apply to all businesses and staff globally.

NatWest Group's ATE Programme addresses the key ATE risk areas and includes but is not limited to:

#### Colleagues

- Delivery of ATE training appropriate to role and jurisdiction
- Ensuring individuals can confidentially report suspicions of tax evasion through the use of the bank's whistleblowing capability and/or through suspicious activity reporting
- Senior Management endorsing that NatWest Group operates a policy of zero tolerance to the facilitation of tax evasion

#### Third Parties

- Conducting Due Diligence on third parties, including Associated Parties who perform services or act on behalf of the NatWest Group
- Specifying where appropriate ATE contract clauses are required in written agreements and requirements for the on-going management of Associated Party relationships

#### Strategic

- Regular risk assessments of all NatWest Group businesses to identify and assess the risk of our Associated Parties facilitating tax evasion and the reasonableness of existing prevention procedures. This an ongoing process and we will continue to strengthen and adopt our prevention procedures as appropriate.
- Enhanced due diligence conducted on higher risk activities
- Performing monitoring and assurance activity to ensure that our procedures, systems and controls are adequately designed and operating effectively.
- Regular benchmarking through industry engagement to ensure procedures are reviewed and can be improved where necessary
- Reporting in line with our obligations - Automatic Exchange of Information (see below)
- Participating in cross industry initiatives to tackle tax evasion.

#### Reporting - Automatic Exchange of Information

To combat tax evasion and avoidance, many governments now investigate where their citizens hold overseas assets. The Foreign Account Tax Compliance Act (FATCA) is U.S. legislation. It requires financial institutions outside the U.S. to provide information to the U.S. tax authorities in relation to accounts held by, in control of and on behalf of US Persons. NatWest Group has policies and procedures in place designed to ensure FATCA compliance.

The Common Reporting Standard (CRS) was introduced by the Organisation for Economic Co-operation and Development (OECD) and is a framework for the automatic exchange of information between over 100 jurisdictions. Like FATCA, CRS requires financial institutions to provide information in relation to accounts held by, in control of and on behalf of foreign tax residents to either their local tax authority or directly to foreign tax jurisdictions (dependent on each jurisdiction's own Inter Governmental Agreement). NatWest Group has policies and procedures in place designed to ensure CRS compliance.

### 5.3 Anti-Money Laundering and Counter-Terrorist Financing (AML/CTF)

Money laundering and terrorist financing causes untold economic and societal harm. NatWest Group has no tolerance for actions and activities that breach systemically or repeatedly Money Laundering and Terrorist Financing laws and regulations.

Responsibility for the AML/CTF programme rests with the Board of Directors of NatWest Group Plc. who promote and encourage a no tolerance approach.

NatWest Group has an AML/CTF programme in place designed to comply with the Money Laundering and Terrorist Finance and Transfer of Funds (information of on the Payer) Regulations 2017 (as amended); the Criminal Finances Act 2017; Sanctions and Anti-Money Laundering Act 2018; the Proceeds of Crime Act 2002 (as amended); the Terrorism Act 2000 and the Anti-Terrorism and Security Act 2001 (as amended); The FCA Handbook and Joint Money Laundering Steering Group guidance, as well as locally applicable laws and regulations.

NatWest Group AML/CTF policy and associated mandatory procedures apply to all businesses and staff globally. NatWest group requires compliance with these obligations whenever a person is acting for or on behalf of the NatWest group. To support this, we provide training on AML/CTF, including mandatory annual online learning, to help to upskill colleagues on the key areas of the Group's AML/CTF programme.

We have invested in technology with a range of systems to support the screening and monitoring of our customers and their behaviour.

NatWest Group's AML/CTF programme includes but is not limited to:

#### Colleagues

- The appointment of a Group Money Laundering Reporting Officer who has responsibility for oversight of NatWest Group's compliance with all relevant laws and regulations
- Delivery of AML/CTF training appropriate to role and jurisdiction
- Ensuring individuals can confidentially report suspicions of money laundering and terrorist financing through the use of the bank's whistleblowing capability or through suspicious activity reporting
- Internal procedures for monitoring and reporting suspicious activities with the associated reporting to appropriate Financial Intelligence Units

#### Strategic

- Regular risk assessments of all NatWest Group businesses to identify and assess the risk of AML/CTF risks relevant to the NatWest Group's activities. This is an ongoing process and the bank will continue to strengthen and adopt our prevention procedures as appropriate.
- Customer identification and verification and the identification of beneficial owners
- Enhanced due diligence conducted on our customers displaying higher risk characteristics
- Screening our customers against relevant politically exposed persons (PEP) and terrorist lists
- Participating in cross industry initiatives to tackle money laundering and terrorist financing.

## 5.4 Sanctions

NatWest Group is committed to complying with sanctions laws and regulations of the UK, EU, UN and US, as well as other applicable sanctions laws and regulations in the jurisdictions in which NatWest Group operate.

NatWest Group takes a prohibitive stance towards transactions and relationships with persons located in countries or regions subject to comprehensive sanctions or owned or controlled by persons in such countries. NatWest Group does not have any subsidiaries or branches in countries or regions subject to comprehensive sanctions. These countries and regions include the Crimea region, Cuba, Iran, North Korea, Sudan and Syria.

Any accounts identified as held by EU or UK designated persons are frozen in accordance with the applicable regulations. NatWest Group is not subject to ownership or control by persons subject to EU, UK and US Sanctions nor are any subsidiaries or branches. NatWest Group does not fall within Articles 5(1) or 5(2) of the Council Regulation (EU) No. 833/2014 of 31 July 2014 as amended by Council Regulation (EU) No. 960/2014 of 8 September 2014, published in the Official Journal of the EU on 12 September 2014, concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine.

NatWest Group has a Sanctions programme in place designed to comply with sanctions laws and regulations of the UK, EU, UN and US, as well as other applicable sanctions laws and regulations in the jurisdictions in which NatWest Group operate. NatWest Group takes a prohibitive stance towards transactions and relationships connected to persons located in countries or regions subject to comprehensive sanctions or owned or controlled by persons in such countries. NatWest Group does not have any subsidiaries or branches in countries or regions subject to comprehensive sanctions.

NatWest Group has procedures and policies designed to comply with the requirements of the EU, UK, UN and US Sanctions regimes globally. In addition, in all countries where NatWest Group entities operate, local law and sanctions lists are also complied with.

NatWest Group's Sanctions programme includes but is not limited to:

### Colleagues

- Delivery of Sanctions training appropriate to role and jurisdiction
- Ensuring individuals can confidentially report suspicions of sanctions evasion through the use of the bank's whistleblowing capability or through escalation to a dedicated sanctions team
- Internal procedures of monitoring and reporting of sanctions evasion
- NatWest Group Board and Senior Management endorsing that NatWest Group operates a policy of zero tolerance for sanctions breaches

### Strategic

- Regular risk assessments of all NatWest Group businesses to identify and assess the risk of Sanctions risks relevant to the NatWest Group's activities. This is an ongoing process and will continue to strengthen and adopt our prevention procedures as appropriate.

- Internal controls to identify, interdict, escalate and report (as appropriate) activity that is prohibited by sanctions or outside NatWest Group Sanctions' risk appetite including screening our customers and transactions against relevant financial Sanctions lists.
- Participating in cross industry initiatives to tackle sanctions circumvention
- A comprehensive testing and audit programmes to identify potential programme weakness and deficiencies

## 5.5 Fraud

Fraud causes untold societal as well as economic harm. NatWest Group is committed to comply with fraud related laws and regulations.

NatWest has no tolerance for internal fraud and for actions and activities that breach systemically or repeatedly Fraud laws and regulations.

Responsibility for our Fraud Prevention programme rests with the Board of Directors of NatWest Group Plc.

NatWest Group has Fraud Prevention policies and mandatory procedures that cover our colleagues, certain third parties and our customers and are designed to identify and prevent fraud. Our policies and associated mandatory procedures apply to all businesses and colleagues globally. To support this, we provide training on fraud, to help to upskill colleagues on the key areas of the Fraud risk.

We have invested in technology with a range of systems to support the screening and monitoring of our customers and their behaviour to prevent and detect fraud.

NatWest Group's Fraud programme includes but is not limited to:

### Colleagues

- Delivery of Fraud prevention awareness
- Ensuring individuals can confidentially report suspicions of fraud through the use of the bank's whistleblowing capability or through suspicious activity reporting
- Internal procedures of monitoring and reporting suspicious activities with the associated reporting to appropriate Financial Intelligence Units

### Strategic

- Regular risk assessments of all NatWest Group businesses. This is an ongoing process and will continue to strengthen and adopt our prevention procedures as appropriate.
- Customer identification and verification
- Screening and monitoring our customers activity to prevent fraud
- Participating in cross industry initiatives to tackle fraud.

## 6. Raising a concern

All our colleagues are encouraged to raise concerns if they become aware of any wrongdoing or misconduct. This applies to permanent employees, temporary employees and secondees, former employees, contractors and those acting on behalf of or representing us, such as consultants.

We have multiple processes in place to facilitate this. Colleagues are encouraged to raise concerns through their line management, the Human Resource function, the complaints process or through the Speak Up service.

- **Line Management** – colleagues are encouraged to raise concerns through their line management in the first instance. Where managers can address the concerns, these are resolved locally, often with support from HR Policy & Advice. Where colleagues are not comfortable to raise the concerns through line management, or line management are not able to resolve it locally, they can raise the concerns through Human Resources, the Complaints process or through the Speak Up service as appropriate.
- Our **Human Resources** (HR) function has processes in place for addressing colleagues' concerns that relate to issues which may be more appropriately managed and supported by HR. These include:
  - Resolving Issues at Work which supports colleagues who have an issue and/or a grievance about their employment that they wish to resolve informally or formally.
  - Redundancy Appeals process which allows colleagues lodge an appeal against their selection for redundancy.
  - Disciplinary process which supports line managers to address concerns about a colleague's conduct.
- **Speak Up** – NatWest Group operates an independent whistleblowing service called 'Speak Up'. It enables colleagues to confidentially report any concerns relating to employee wrongdoing or misconduct. Concerns can be raised confidentially or anonymously through a range of methods including a web portal, a telephony service, a mobile app or by contacting the Group's Speak Up team. All concerns raised are reviewed and, where they qualify as a whistleblowing report, an investigator is assigned to undertake an investigation. Concerns that do not qualify are referred to a more appropriate process such as the Resolving Issues at Work process or the Customer Complaints process.

All colleagues across the NatWest Group complete annual training on Speak Up to ensure they are aware of the service and how to raise concerns. Specialist training is also completed annually by colleagues in our Investigations, Human Resources and Internal Audit teams who are involved in the addressing the concerns raised by colleagues.

Our whistleblowing service, Speak Up, is available to all our suppliers, enabling them to report and raise concerns with NatWest Group, including any financial crime concerns. Speak Up is brought to suppliers' attention through our Supplier Charter.

In addition, NatWest Group have a mechanism for staff to raise internal suspicious activity reports, as set out in the Proceeds of Crime Act and Terrorism Act.

## 7. Suppliers

At NatWest Group, we expect suppliers to engage on the following financial crime related commitments:

- Adhere to applicable national and international laws and regulations, including not providing services to the Group from a sanctioned territory
- Eradicate corruption, extortion and bribery as well as the facilitation of tax evasion in your own organisation and supply chain
- Comply with the Modern Slavery Act, which covers the offences of slavery, servitude, forced and compulsory labour and human trafficking

Adherence to these commitments is required as part of our supply chain tendering process and throughout the life of the supplier engagement.

In line with good practice, we conduct review meetings with suppliers. Compliance with our Supplier Charter is a standing agenda item at these meetings. If a supplier is unable to comply with the financial crime commitments within the Supplier Charter, this is raised through the Group's operational risk process. This includes engagement with the supplier to offer support and identify possible remediation measures.

## 8. Our Customers

### 8.1 Data protection and privacy

Data protection ensures the right to privacy and gives individuals rights in relation to their information. At NatWest Group, we understand that our customers trust us not only with their finances but also with their information and that we need to meet their expectations in terms of how we obtain, hold and use that information. We have number of policies in place that govern the processing of our customer and personal information by all parts of the NatWest Group in all jurisdictions. Our externally available privacy notice provides a comprehensive overview about how we handle personal information, including what information we collect, what we do with that information and under what circumstances we would share that information with third parties.

Accountability is a key principle of data protection and privacy, and ultimate accountability lies with the Board. The NatWest Group has appointed a Group Data Protection Officer who is responsible for overseeing data protection compliance across the bank and keeping the Board informed.

We provide training on privacy to all colleagues within the Group, including mandatory annual online learning, and bespoke training as necessary for specific colleagues based upon their job roles.

### 8.2 Raising a concern

A customer can raise a concern or express their dissatisfaction with any element of the service they received. The customer can raise such concern or dissatisfaction online, on the phone, in writing or in person at one of our branches. NatWest Group has a Complaints Management policy and detailed procedures for complaint handlers to follow in managing and addressing complaints. Where a customer's complaint alleges employee misconduct or wrongdoing, it is referred to one of the specialist NatWest Group investigations teams.

If a customer or individual would like to raise a concern on how any part of the group has handled their personal information, this can be raised via Customer Complaints or directly with our Data Protection Officer, who will ensure the matter is fully investigated.

## 9. Communities

Our purpose is supported by commitments in three focus areas: tackling climate change, supporting enterprise, and learning (both for our colleagues and through financial capability interventions for children and adults). By delivering our purpose, we hope to tackle traditional barriers, develop new opportunities and create a greener, fairer, more inclusive and safer society where all individuals thrive.

NatWest Group is an active participant in public and private sector initiatives to tackle financial crime and thereby supporting enterprise and individuals to thrive and be safe. Such as:

- **Joint Money Laundering Intelligence Taskforce (JMLIT)** : NatWest Group was a founding member of the JMLIT, a partnership between law enforcement and the financial sector to exchange and analyse information relating to money laundering and wider economic threats.
- **Joint Fraud Taskforce:** NatWest Group is a participant of the Joint Fraud Taskforce, aiming to reduce the level of fraud, and the harm it causes to individual victims, by making it significantly more difficult for fraudsters to operate. The taskforce brings together Government, the banking, payments and telecoms industries, victim groups, law enforcement, charities, local authorities and regulators.
- **Authorised Push Payment Contingent Reimbursement Model (APP CRM):** NatWest Group supported the derivation of the APP CRM code with other banks and payment providers to tackle authorised push payment fraud, strengthen consumer protection and clarify the circumstances in which victims of APP scams may be reimbursed. We were one of the first eight banks signing up to the code and covers the following brands – NatWest, Royal Bank of Scotland and Ulster Bank NI brands.
- **Take Five and Friends Against Scams:** supporting our customers goes beyond delivering fair products and great service. It also means educating our customers, wider society and future generations in relation to how they can best protect themselves from financial crime. The Bank are signatories of the Take Five Charter a national campaign providing impartial advice to help everyone protect themselves from preventable financial fraud. We also participate in the Friends Against Scams initiative which aims to upskill individuals on different types of scams and how to spot a victim and with this increased knowledge and awareness help protect themselves and others.
- **HMRC Counter Fraud Banking Forum:** Natwest Group is a participant in the HMRC Counter Fraud Banking Forum. This is a HMRC chaired and facilitated open forum where banks can share best practice on risk assessment and risk management of tax fraud matters.

We are also active members of a range of UK Finance groups to support the collective industry effort across a number of financial crime matters.

## 10. Governance

Our approach to Financial Crime is subject to relevant bank governance and covers all of NatWest Group. Committees are held at both Group and franchise Executive levels across all lines of defence.

Our financial crime policies and procedures are reviewed on a regular basis and are updated as required.

This statement was approved by the Group Chief Financial Crime Risk Officer (Group MLRO) NatWest Group plc.

## 11. Appendix

### 11.1 USA PATRIOT Act Certificate

#### NatWest Group plc GLOBAL USA PATRIOT ACT CERTIFICATION

*The information contained in this Certification is sought pursuant to Sections 5318(j) and 5318(k) of Title 31 of the United States Code, as added by sections 313 and 319(b) of the USA PATRIOT Act of 2001 (Public Law 107-56).*

This Certification should be completed by any **foreign bank** that maintains a **correspondent account** with any U.S. bank or U.S. broker-dealer in securities (a **covered financial institution** as defined in 31 C.F.R. 103.175(f)). An entity that is not a foreign bank is not required to complete this Certification.

A **foreign bank** is a bank organized under foreign law and located outside of the United States (see definition at 31 C.F.R. 103.11(o)). A **bank** includes offices, branches, and agencies of commercial banks or trust companies, private banks, national banks, thrift institutions, credit unions, and other organizations chartered under banking laws and supervised by banking supervisors of any state (see definition at 31 C.F.R. 103.11(c)).

A **Correspondent Account** for a foreign bank is any account to receive deposits from, make payments or other disbursements on behalf of a foreign bank, or handle other financial transactions related to the foreign bank.

*Special instruction for covering multiple branches on a single Certification:* A foreign bank may complete one Certification for its branches and offices outside the United States. The Certification must list all of the branches and offices that are covered and must include the information required in Part C for **each** branch or office that maintains a Correspondent Account with a Covered Financial Institution. Use attachment sheets as necessary.

**A.** The undersigned financial institutions, NatWest Group plc with its Head Office located at **36 St Andrew Square, Edinburgh, Midlothian, EH2 2YB** and each of its branches and bank affiliates listed in the attachment hereto (“**the NatWest Group entities**”) hereby certifies as follows:

#### **B. Correspondent Accounts Covered by this Certification:**

This Certification applies to **all** accounts established for NatWest Group plc by Covered Financial Institutions.

#### **C. Physical Presence/Regulated Affiliate Status:**

Each NatWest Group bank entity either maintains a physical presence or is a regulated affiliate (denoted by an asterisk (\*)) of NatWest Group. That means that each of the NatWest Group bank entities listed in the attachment:

- Has a place of business at the street address set forth in the attachment hereto, where it employs one or more individuals on a full-time basis and maintains operating records related to its banking activities;
- Is authorised to conduct banking activities in the country where its place of business is located; and
- Is subject to inspection by the banking authority identified in the attachment hereto that licensed the particular NatWest Group bank entity to conduct banking activities;

#### **D. Indirect Use of Correspondent Accounts:**

No Correspondent Account maintained by a Covered Financial Institution may be used to indirectly provide banking services to certain foreign banks. Each of the NatWest Group bank entities hereby certifies that it does **not** use any Correspondent Account with a Covered Financial Institution to indirectly provide banking services to any foreign bank that does not maintain a physical presence in any country and that is not a regulated affiliate.

#### **E. Ownership Information:**

**Form FR Y-7 is on file.** Foreign Bank has filed with the Federal Reserve Board a current Form FR Y-7 and has disclosed its ownership information on Item 4 of Form FR Y-7.

#### **F. Process Agent:**

NatWest Markets Securities Inc. is a resident of the United States at the following address: NatWest Markets Securities Inc., Attn: Legal Department, 600 Washington Boulevard, Stamford, CT 06901 and is authorized to accept service of legal process on behalf of NatWest Group bank entities that have a Correspondent Account with a Covered Financial Institution from Secretary of the Treasury or the Attorney General of the United States pursuant to Section 5318(k) of title 31, United States Code.

#### **G. General**

Each of the NatWest Group bank entities hereby agrees to notify in writing each Covered Financial Institution at which it maintains any Correspondent Account of any change in facts or circumstances reported in this Certification. Notification shall be given within 30 calendar days of such change.

Each of the NatWest Group bank entities understands that each Covered Financial Institution at which it maintains a Correspondent Account may provide a copy of this Certification to the Secretary of the Treasury and the Attorney General of the United States. The NatWest Group bank entities further understands that the statements contained in this Certification may be transmitted to one or more departments or agencies of the United States of America for the purpose of fulfilling such departments' and agencies' governmental functions.

I, Marcus Wogart certify that I have read and understand this Certification, that the statements made in this Certification are complete and correct, and that I am authorized to execute this Certification on behalf of the NatWest Group bank entities.



Group Chief Financial Crime Risk Officer  
Risk  
NatWest Group plc  
Executed on 10th June 2021

### **11.2 Wolfsberg Group Correspondent Banking Due Diligence Questionnaire**

The Wolfsberg Group Correspondent Banking Due Diligence Questionnaire is available on request to counterparts requiring this information in support of a relationship with a NatWest Group entity.