

Environmental, Social and Ethical Risk Policy Summary

Gambling Sector



**NatWest
Group**

The NatWest Group plc and its subsidiaries (the NatWest Group) Environmental, Social and Ethical (ESE) risk management framework is one of several risk management systems we operate, comprising policies and processes to give us better insight into our customers' activities, help address issues of concern, minimise risks to the bank and manage stakeholder expectations. It gives clear guidance to staff on the procedures they must follow when dealing with customers and transactions in these sectors.

Our policies reflect adherence to national and international laws and regulations, wherever they apply. We have also incorporated a number of voluntary standards such as the Equator Principles and the UN Global Compact.

Scope

The Gambling sector policy covers NatWest Group support to customers operating in the gambling sector.

Context

As a purpose-led bank we champion potential, helping people, families and businesses to thrive.

NWG only supports responsible gambling. We recognise that gambling is considered to be a leisure activity for many people, however we also recognise that it can be associated with addiction and other harmful outcomes for a minority.

We consider customer relationships carefully and will only do business with companies who are committed to the highest level of customer care and place safer gambling at the forefront of their operations and strategy. We expect them to achieve, or be working towards achieving the GamCare Safer Gambling Standard accreditation by the end of 2022.

We are also committed to supporting our customers. We offer a gambling blocking feature via our mobile app which allows customers to self-exclude and lock their card so that it can't be used on gambling sites. We have partnered with the Money Advice Trust to provide training to specialist colleagues on vulnerabilities, including gambling addiction.

NWG works with UK gambling charity, GamCare, to enable them to provide one to one support using NatWest branches for private consultations and to provide a range of talking therapies. We have a dedicated Customer Protection Team which connects customers affected by gambling-related harm with expert support via our GamCare partnership.

Our ESE policy requirements

We expect and encourage our customers to demonstrate commitment and compliance to mitigating ESE risks through:

- Having in place and embedding policies and plans which demonstrate a good understanding of ESE and financial crime issues.
- Demonstrating the capacity to manage these risks through good governance and controls.
- A positive track record of managing ESE risks.

- A commitment to transparency.

Within our policy we set out Prohibited, Restricted and Normal activities. We do not support customers and/or transactions involving prohibited activities.

Customers engaged in restricted activities undergo enhanced due diligence including review by a reputational risk committee or approver and re-evaluation every one or two years. Customers undertaking 'normal' (lower risk) activities are assessed for ESE every five-years unless an event triggers a review in the interim period.

This table highlights key activities that fall within the gambling sector policy:

Prohibited

- The provision of banking services to any gambling company operating in jurisdictions where gambling is not legal
- Online Gambling Operators who are not in scope of the United Kingdom or Republic of Ireland licensing regimes (including Alderney or Gibraltar)
- Customers who have not achieved, or not are working towards achieving the GamCare Safer Gambling Standard Advanced Level 1 by the end of 2022
- Unlicensed operators where a licence is required
- Junket Operators
- Evidence of serious breaches of regulations or licence conditions including financial crime and social responsibility clauses

Restricted

- Beneficial Owners/Company Directors of Online Gambling Operators or land-based casinos where the underlying gambling operator is undertaking prohibited activity, subject to investigations or is the subject of adverse media.
- Professional gamblers who are subject of on-going investigation or adverse press.
- Provision of banking services to companies / entities operating North American Tribal Gaming
- Introducers to gambling websites (currently exempt from the Gambling Commissions licensing scheme) should have or be working towards achieving social responsibility accreditation such as GamCare or other industry equivalent where it exists.
- Land-based casinos undertaking Money Service Business activity

Normal

- Provision of banking services to gambling operators where none of the above applies and no material issues have been identified during the annual review process.