

Metro Bank PLC

**External Sanctions Compliance
Statement**

September 2026

This document summarises the approach that Metro Bank PLC (“Metro Bank”) takes to ensure compliance with its sanctions and proliferation financing obligations.

Metro Bank is committed to meeting all its legal and regulatory obligations in relation to Sanctions and Proliferation Financing regulations, including those applicable to Metro Bank imposed by the United Nations (UN), United Kingdom (UK), European Union (EU), and the United States (U.S.).

Sanctions are restrictions imposed by governments, intergovernmental organisations, and regional bodies to achieve specific foreign policy or national security objectives. They include financial sanctions, trade sanctions, immigration sanctions, aircraft and shipping sanctions or other restrictions as defined by the legislations which the Bank complies with. They may be directed at certain individuals, entities, industry sectors or countries.

Proliferation Financing refers to the provision of funds, or financial services, to support the manufacture, acquisition, development, export, trans-shipment, brokering, transport, transfer, stockpiling of, or otherwise in connection with the possession or use of, chemical, biological, radiological or nuclear weapons including the provision of funds or financial services in connection with the means of delivery of such weapons and other CBRN-related goods and technology, in contravention of a relevant financial sanctions obligation.

This means we may not be able to provide products or services to certain individuals, entities or countries. It also means that we may have to hold certain transactions to review whether they are permitted by law and are deemed within Metro Bank’s risk appetite. If we do not believe a transaction is permitted, we may block the customer’s access to the funds or refuse to process the transaction, depending on the circumstances and our legal and regulatory obligations. We may also take further actions that we believe necessary to prevent a breach of sanctions regulations. We recognise the adverse impact these steps may have on certain customers and are committed to acting in a proportionate manner by only taking those steps which are necessary to achieve these aims.

To manage and mitigate the risk of breaching Sanctions and Proliferation Financing regulations, Metro Bank is committed to taking the following actions:

- Regularly reviewing our Sanctions and Proliferation Financing policy and regularly assessing our sanctions and proliferation financing risk exposure, including whenever there is a material change to our legal and regulatory requirements or to our risk appetite.
- Ensuring that all our colleagues understand our and their own Sanctions and Proliferation Financing obligations and are given regular training on how to identify and prevent potential sanctions evasion and violation.

- Prohibiting business that might prevent us from meeting our legal, regulatory or other obligations in relation to Sanctions and Proliferation Financing or that may introduce other financial crime risks outside of our risk appetite. This includes:
 - Not providing products or services to individuals and/or entities on a sanctions list.
 - Not conducting business directly or indirectly with or for the ultimate benefit of, countries subject to sanctions, Proliferation Financing restrictions or countries that are recognised by Metro Bank (based on guidance from relevant external organisations, for example, the Financial Action Task Force or the European Union) as presenting a high risk of financial crime. Such countries, which may be subject to change, currently include:
 - Belarus
 - Cuba
 - Iran
 - North Korea
 - Non-government controlled Ukrainian territory
 - Russia
 - Syria
 - Not providing access to Metro Bank products or services, including online banking to the above list of countries, which Metro Bank has determined to be outside of risk appetite. Customers must not attempt to call or otherwise contact Metro Bank whilst located in any of these countries. Accessing our products and/or our services from any of these countries may result in account(s) being blocked.
- Screening our customers, parties connected to our customers, employees and any other parties that have a relationship with Metro Bank against applicable sanctions lists at account opening and at other points throughout the course of the relationship.
- Screening incoming and outgoing transactions, as determined appropriate, against applicable sanctions lists before transactions are executed.
- Investigating all potential sanctions concerns using trained sanctions colleagues.
- Blocking access to or refusing to process, at our discretion, any transactions that we consider posing a risk of breaching sanctions regulations, and/or that fall outside our risk appetite.

- Reporting actual and suspected breaches of sanctions to the relevant authorities, including attempts to evade sanctions.

Authorised transactions will be processed at our discretion, if doing so would not breach applicable sanctions or is permitted by a specific or general licence. These transactions will be considered on a case-by-case basis.

We may also, at our discretion, decide not to provide products or services even where permitted by regulations, if these activities fall outside of our risk appetite.

In certain circumstances, we may request additional information, and/or ask our customers to visit their local Metro Bank Store, to determine whether transactions or other activities are permissible. Failing to provide this information may mean that, in line with our legal and regulatory obligations, transactions are delayed, rejected or blocked, or that accounts are blocked. It may also mean that a report is made to the relevant authorities.

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