



Programme Outline Form for Payment account opening and Card Issuing

SECTION A: PARTNER DETAILS

Business Name	Trading 212 UK Limited
Business Type: (Regulated, NGO, Company, PLC)	Regulated under FCA
Business Website	www.trading212.com
Business Registration No.	08590005
TAX number	432334427
Country of Registration	UK
Incorporation date	28 June 2013
Business address	Aldermay House, 10-15 Queen Street, London, EC4N 1TX, United Kingdom
Correspondence address	Aldermay House, 10-15 Queen Street, London, EC4N 1TX, United Kingdom
Trading Name	Trading 212
Phone number	N/A
Trading Website	www.trading212.com
Target Launch Date	January 1st, 2024

SECTION B: PROGRAMME OVERVIEW

1. Description of the programme offering:

Trading 212 UK will be providing payment services on behalf of its principal, Paynetic UK Ltd, as a distributor/programme manger of electronic money.



Based on the Agreement, Paynetics UK will issue for end customers of T212, virtual and plastic debit MasterCard payment cards in GBP which will be associated to electronic money accounts in GBP.

Paynetics UK shall provide ability for end customers to receive their free funds from their account for investment deals within the Trading Platform, in accordance with the instruction by T212 UK, and to use them, via issued payment cards, for purchases of goods and services at physical or virtual POS and for withdrawals at ATM.

2. Programme status: (new or existing programme)

New

3. Business Model details

We will support both instant issuance of virtual and physical cards, enabling T212 to cater to diverse user needs. We, at T212 know that our consumers are not only interested in trading or investing in equities and other financial products, but want to have the financial freedom to use their capital for life's expenses. We want to allow our consumers to spend and at the same time to save and invest. We want to create a better financial inclusion for our consumers and not only issue a debit card, but create a gateway to a different and better lifestyle.

4. Sector, market, or industry that proposed solution will operate in:

Financial services

5. Target Customer profile:

6.Type of program:

☐ Business debit cards

☒ Consumer debit cards

7.Branding:

☐ Co-branded program scheme

☒ Generic program scheme

8.BIN arrangement

☐ Shared BIN

☒ Dedicated BIN

☐ Visa

☒ Mastercard

Currency:

☐ EUR ☒ GBP ☐ USD

9.Cards funding:

☒ Cardholder own funds

☐ Another source which is business

☐ Other: please specify

10. Program management

☒ own solution to connect directly to Paynetics APIs

☐ via Paynetics Web Partner Portal



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11. Cardholder facing app

☐ Own mobile app

☐ Paynetics white label

☐ Not needed

12. User experience and application details:

SECTION C: DETAILED PROGRAMME SCOPE

13. Programme Type:

☐ Consumer Programme

☐ Commercial Programme

14. Payment Services Required:

Card Services:

☐ Personalized

☐ Non-personalized

☐ Virtual

☐ Digital

☐ Plastic

☐ Reloadable

☐ non-reloadable

☐ Validity – 12 months

☐ Validity – 24 months

☐ Validity – 36 months

Distribution of Cards:

☐ Ship directly to cardholder

☐ Shipped in bulk

☐ N/A

Account Services:

☐ IBAN – individual

☐ IBAN – corporate

Programme Currencies:

☐ EUR

☐ GBP

☐ USD

15. Other functionality or specific requirements – Please detail below:

16. Card Activation - please describe activation flow:

in-app activation

17. PAYMENT ACCOUNTS FUNCTIONALITY

☐ Incoming

☐ Outgoing

☐ P2P (Internal)

18. Process flow diagram (append file to this form)shared

19. Supported Incoming and Outgoing Fund Flows (append file to this form)shared



Incoming fund flow source	[Y/N]	Expected %	Outgoing fund flow destination	[Y/N]	Expected %
Card Acquiring (via Innovator Float)			ATM Cash Withdrawal		
3 rd Party Account (via P2P Payout)			Card Purchases		
Bank Transfers from Own Bank Account			Bank Transfers to Own Bank Account		
Bank Transfers from 3 rd Party Bank Account			Bank Transfers to 3 rd Party Bank Account		
Bank Transfers from outside EEA			Bank Transfers to outside EEA		
Funding from Crypto, Gambling or other wallets			Load to Crypto, Gambling or other wallets		

20. End-client identification & verification process (provide details)

☐ Have own solution – please specify provider **Onfido and GB Group UK**

☐ Required from Paynetics - please specify clients' countries of establishment/residency

SECTION D: PROGRAMME USAGE AND VOLUMES

21. Programme domain criteria:

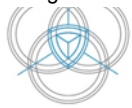
- What type of goods/services will be purchased through this programme? Investment services

- In which geographies will customers using this programme be located?

Region	Percentage of customers
EEA	35%
UK	64%
RoW	1%

22. Programme volumes and spending controls criteria - In which geographies will purchases be carried out?

Region	Percentage of spend volume
EEA	35%



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UK	64%
RoW (Country + target %)	1%

23. Annual Volume Projections for the issued cards for the first three years - What is the volume of **deposits** expected to be received per Customer?

Per day	GBP 25
Per month	GBP 705
Per year	GBP 8,194

- What is the expected volume of **card spends** done per month?

Per day	GBP 21
Per month	GBP 605
Per year	GBP 7,194

- What is the expected Average Transaction Value for card purchases: GBP 55
- What transaction restrictions shall apply to cards issued under this programme: We will use the Marqeta Risk module with all available controls
- What is the expected Maximum Transaction Value for card purchases: GBP 10,000
- What transaction restrictions shall apply to cards issued under this programme? - > These will be provided on a later stage
 - ☐ MCC blacklist (provide exhaustive list)
 - ☐ MCC whitelist (provide exhaustive list)
 - ☐ MID blacklist (provide exhaustive list by Merchant name)
 - ☐ MID whitelist (provide exhaustive list by Merchant name)
 - ☐ Operational limits – card (provide list)
 - ☐ Operational limits – IBAN (provide list)
- Card Transaction Type restrictions: These will be provided on a later stage once we sync
 - ☐ Contactless Payments
 - ☐ ATM Withdrawals
 - ☐ E-Commerce Transactions
 - ☐ Cashback Transactions
 - ☐ Credit Authorisations

SECTION E: PROGRAMME CONTROLS AND LIMITS

24. Value Account Balance controls

- | | |
|---|-----------|
| <ul style="list-style-type: none"> Average value expected to be held in Ledger Accounts belonging to an individual Consumer at any point in time | GBP 1,250 |
|---|-----------|



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<ul style="list-style-type: none"> Maximum value that can be held in Ledger Accounts belonging to an individual Consumer at any point in time 	GBP 1,000,000
25. Incoming Fund Flow controls	
<ul style="list-style-type: none"> Expected average total amount of incoming deposits from own external sources into Ledger Accounts belonging to individual Consumer within a day/month/year 	GBP 2,000 a month
<ul style="list-style-type: none"> Maximum total amount of incoming deposits from own external sources into Ledger Accounts belonging to individual Consumer within a day/month/year 	GBP 1,000,000 a month
<ul style="list-style-type: none"> Expected average total amount of incoming deposits from 3rd party external sources into Ledger Accounts belonging to individual Consumer within a day/month/year 	no third party payments are allowed
<ul style="list-style-type: none"> Maximum total amount of incoming deposits from 3rd party external sources into Ledger Accounts belonging to individual Consumer within a day/month/year. 	no third party payments are allowed
<ul style="list-style-type: none"> Expected average total amount of incoming deposits from 3rd party external sources into Ledger Accounts from high risk merchants (e.g crypto exchanges / gambling) 	no third party payments are allowed
26. Outgoing Fund Flow controls	
<ul style="list-style-type: none"> Expected average total amount of outgoing transfers from Ledger Accounts to own destinations within a within a day/month/year 	GBP 900
<ul style="list-style-type: none"> Maximum total amount of outgoing transfers from Ledger Accounts to own destinations within a day/month/year 	GBP 1,000,000
<ul style="list-style-type: none"> Expected average total amount of outgoing transfers from Ledger Accounts to 3rd party destinations within a within a day/month/year 	no third party payments are allowed
<ul style="list-style-type: none"> Maximum total amount of outgoing transfers from Ledger Accounts to 3rd party destinations within a within a day/month/year 	no third party payments are allowed
<ul style="list-style-type: none"> Expected average total amount of incoming deposits from 3rd party external sources into Ledger Accounts from high risk merchants (e.g crypto exchanges / gambling) 	no third party payments are allowed

Completed by:

(Name, Position, and signature)

Russell Piper

Chief Risk Officer

DocuSigned by:

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Date: 9/2/2024