

GD 3 Compliance Template

Purpose

This template comprises a set of forms and associated guidance to assist the operators of regulated payment systems in completing the compliance reports that are required by the PSR General Directions on Access and Governance.

Operator	GD3
CUP	✓
JCB	✓
AMEX	✓
LINK	✓
MASTERCARD	✓
VISA	✓
Diners	✓

Operators must comply with our directions and also report annually on how they're achieving compliance. In doing this, it will be important to reflect on the principles-based nature of the obligations that are in place.

This key evidence will show how you have responded to these rules over the 12-month period from 1 October to 30 September.

Confidential information

We recognise you deal with confidential information, some of which is relevant to the reporting arrangements. This information can be provided in one of the confidential annexes which are set out as part of this template. Information not contained within the annexes will not be treated as confidential and may be published in the course of our reporting on operators' compliance with these general directions.

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Supporting documents

In completing the forms in this template you should reference documents to evidence your descriptions (i.e. Web links to public documents; sections where relevant). If any supporting documents are confidential they should be provided to us separately and marked up as confidential.

Contacting us

We hope the forms are clear, but if you have any questions please feel free to contact [REDACTED].

Form B - General Direction 3

Please complete the form below. The **main headings** relate to the reporting requirements of general direction 3. The sub-headings provide you with guidance on the information that we would like you to provide in order to meet the reporting requirements.

GD3.3.3 Self-assessment on compliance of access requirements contained in regulation 103 of the Payment Services Regulations 2017.

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<p>GD3.3.3b Please state whether you have or have not complied with the obligation contained in regulation 103 of the PSRs 2017.</p> <p>Please include a summary relevant to your response.</p>	<p>➤ <u>Suggested limit: 500 Words</u></p> <p><i>UPI has fully complied with the regulation 103 of the RSRs 2017.</i></p> <p><i>UPI has uniform standards for Membership: Each applicant for UPI Membership shall have a qualification for carry UnionPay card business or programs as per the relevant law or regulations, qualified operational and technical capability, organization structure and assigned personnel and a business plan to be implemented in compliance with the development and expansion objectives of the UnionPay brand. Applicants may apply for General or Acquiring only Principal Membership. A one-off membership fee is charged, scaled to asset size, once Provisional Membership is approved. Any entity regulated by the local Competent Authority for their proposed business activity may apply for membership.</i></p> <p><i>UPI carries out uniform examination and evaluation on each applicant upon receipt of the application materials submitted by an applicant.</i></p> <p><i>This examination and evaluation includes business operations, credit risk status and technical support capabilities, and evaluates whether the applicant meets the following requirements:</i></p> <ul style="list-style-type: none"> ● <i>The applicant complies with the eligibility criteria for UPI Membership.</i> ● <i>The applicant has established prudent management policies including but not limited to, Cardholder credit risk monitoring and Merchant risk monitoring.</i>
<p>GD3.3.3c1 Please highlight all occasions over the past 12-months where access has been withdrawn or modified for an existing service user.</p>	<p><u>Suggested limit: 300 Words</u></p> <p><i>Membership termination:</i></p> <ol style="list-style-type: none"> 1. <i>Merchant Optimisation Services Limited was imposed restrictions on financial services activities by FCA</i> 2. <i>ONESTOPMONEYMANAGER LTD was imposed restrictions on financial services activities by FCA,</i> 3. <i>Allied Wallet Limited was ceased trading by FCA.</i>
<p>GD3.3.3 Details of expressions of interest in potentially securing direct access or direct technical access and the response to, and outcome of, such expression of interest.</p>	

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<p>GD3.3.3c2 all occasions in the relevant 12-month period when another party had expressed interest in potentially securing direct access or direct technical access to the payment system</p>	<p>Complete the following table. Data should be correct as at 30 September.</p> <table border="1" data-bbox="685 292 2029 424"> <thead> <tr> <th data-bbox="685 292 1021 357"><i>Expressions of interest</i></th> <th data-bbox="1025 292 1357 357"><i>Signed letters of intent</i></th> <th data-bbox="1361 292 1693 357"><i>New members during reporting period</i></th> <th data-bbox="1697 292 2029 357"><i>No. of participants</i></th> </tr> </thead> <tbody> <tr> <td data-bbox="685 360 1021 424">➤ 5</td> <td data-bbox="1025 360 1357 424">➤ 1</td> <td data-bbox="1361 360 1693 424">➤ 1</td> <td data-bbox="1697 360 2029 424">➤ 0</td> </tr> </tbody> </table>	<i>Expressions of interest</i>	<i>Signed letters of intent</i>	<i>New members during reporting period</i>	<i>No. of participants</i>	➤ 5	➤ 1	➤ 1	➤ 0
<i>Expressions of interest</i>	<i>Signed letters of intent</i>	<i>New members during reporting period</i>	<i>No. of participants</i>						
➤ 5	➤ 1	➤ 1	➤ 0						
<p>GD3.3.3c3 the initial response to the expression of interest, and the outcome at the conclusion of the process</p>	<p><u><i>Suggested limit: 300 Words</i></u></p> <p><i>UPI launch initial review on the membership application documents submitted by the applicants. UPI would issue Provisional Letter of Authorization upon request after management review, or official Letter of Authorization after member council review, with which the applicants could launch corresponding business.</i></p> <p><i>Please complete any confidential information in the table at confidential annex 1. This information will not be published.</i></p>								
<p>GD3.3.3 Details of any enquiries or objections regarding potential changes to access requirements and details of the response and outcome.</p>									
<p>GD3.3.3d details of all occasions in the relevant 12-month period where you engaged with, and considered the views of PSPs and other interested parties on the operation and effectiveness of your access requirements</p>	<p>➤ <u><i>Suggested Limit: 300 Words</i></u></p> <p><i>No change. In the transition period of Brexit, EEA passporting regime is still effective, which means applicants from EEA countries including UK could conduct business in EEA.</i></p> <p><i>Please complete any confidential information in the table at confidential annex 2. This information will not be published.</i></p>								

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GD3.3.3 Details of any anticipated review, or engagement with *payment service providers* and other interested parties in relation to *access requirements*.

GD3.3.3e details of any anticipated review of your access requirements, or any engagement with service-users and other interested parties, that you plans to take over the following 12-month period

➤ Suggested Limit: 300 Words

The UPI Bylaws of Membership are subject to periodic review, the last being in 2018. There is no immediate update planned.

Once transition period of Brexit closed, the business continuity would depend on latest local regulation. The current assumption is that passporting rights to the EEA will cease, and existing and potential members should plan accordingly.

GD3.3.3 Details of any anticipated future developments, material updates or changes to *access requirements*.

GD3.3.3f details of any anticipated future developments that you may require or material updates or changes to your access requirements

➤ Suggested Limit: 300 Words

Once transition period of Brexit closed, the applicants need to obtain required permission from local regulator.

- *UK applicants need to obtain permission from the regulator of EEA countries (if required)*
- *EEA applicants need to obtain permission from FCA*