

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>JCB has complied fully with the access requirements contained within Reg. 103 PSR's 2017 throughout the 12-month period.</p> <p>Procedurally and operationally JCB has ensured all prospective accessors and pre-existing participants to JCB's payment system uphold their compliance to the universal brand standard principles and policies outlined within JCB International Co., Ltd ("JCBI"), JCB Regulatory Publications ("JRP").</p> <p>The JRP unequivocally provisions for the rules and conditions required for JCBI to grant initial and continued access to the JCB payment system for 'Licensees' (payment service providers) operating as acquirers of JCB Card transactions and/or issuers of JCB Cards operating outside of Japan. Via execution of bi-lateral license agreements as legal instruments, Licensees self-declaratively agree to accept and uphold the JRP brand standard eligibility rules, principles and policies, including rights of monitoring where necessary.</p> <p>JCBI maintains the above methodology towards granting and maintaining access is an objective, proportionate and non-discriminatory technique which broadly and equilaterally applies the same requisite access and maintenance criteria to all pre-existing and new potential Licensee's throughout the 12-month period; and utilises only the principles of payer/payee best-practice and legal compliance in a non-inhibitive manner within the applicable territories of operation.</p> <p>Furthermore, through the stated methodology, provided the minimal legal qualifying criteria are achieved and maintained by Licensees, JCBI has not distinguished any intrinsic restrictions towards Licensee's by their institutional status, nor for their participation in other payment systems. On the contrary, JCBI specifically stipulates anti-discriminatory rules for the handling of co-badged cards, which may instigate access to payment systems other than JCB itself.</p>
<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>There have been no occasions over the past 12 months where access has been withdrawn for JCB UK partners.</p> <p>An introduction of pre-accreditation for staged-digital wallet operators was universally applied in the JRP, so that all existing service users must apply to JCB before allowing the operation of such wallet operators.</p>

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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.												
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><i>Complete the following table. Data should be correct as at 30 September.</i></p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <tr> <th style="width: 25%; padding: 5px;"><i>Expressions of interest</i></th> <th style="width: 25%; padding: 5px;"><i>Signed letters of intent</i></th> <th style="width: 25%; padding: 5px;"><i>New members during reporting period</i></th> <th style="width: 25%; padding: 5px;"><i>No. of participants</i></th> </tr> <tr> <td style="padding: 5px;">➤ 8</td> <td style="padding: 5px;">➤ 0</td> <td style="padding: 5px;">➤ 1</td> <td style="padding: 5px;">➤ 9</td> </tr> </table> <p>(Only for UK partners)</p>				<i>Expressions of interest</i>	<i>Signed letters of intent</i>	<i>New members during reporting period</i>	<i>No. of participants</i>	➤ 8	➤ 0	➤ 1	➤ 9
<i>Expressions of interest</i>	<i>Signed letters of intent</i>	<i>New members during reporting period</i>	<i>No. of participants</i>									
➤ 8	➤ 0	➤ 1	➤ 9									
GD3.3.3c3 the initial response to the expression of interest, and the outcome at the conclusion of the process	<p><u><i>Suggested limit: 300 Words</i></u></p> <p>Interested parties would approach members of the Sales Team requesting information about joining JCB as a License Member. JCB will then raise a Non-Disclosure Agreement (NDA) and execute this with the interested party. Once the NDA is in place JCB and the prospective partner evaluated the commercial viability of the prospective partner gaining JCB acquiring functionality and JCB shared its Licence Agreement documents and the technical specifications needed to access the JCB platform. Parties would then either cease discussion or agree the JCB License Agreement and the method of connectivity between the two technical platforms after which there would set up a formal project with an agreed system live date to enable JCB acceptance with their customers.</p> <p><i>Please complete any confidential information in the table at confidential annex 1. This information will not be published.</i></p>											
GD3.3.3 Details of any enquiries or objections regarding potential changes to access requirements and details of the response and outcome.												
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	<p>➤ <u><i>Suggested Limit: 300 Words</i></u></p> <p>JCB has received several enquiries from our UK partners regarding operational connection to our system within the relevant 12-month period, which are/were handled by our sales and marketing team in an appropriate manner accordingly. However, no objections were received from our UK partners and other interested parties to the effectiveness of JCB's access requirements.</p>											

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operation and effectiveness of your access requirements	<i>Please complete any confidential information in the table at confidential annex 2. This information will not be published.</i>
GD3.3.3 Details of any anticipated review, or engagement with <i>payment service providers</i> and other interested parties in relation to <i>access requirements</i>.	
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	<p>➤ <u>Suggested Limit: 300 Words</u></p> <p>Our access requirements are intrinsically linked to the JRP as outlined. This is renewably published every year and the contents are pre-checked to ensure legal compliance. If any issues related to our access requirements are identified, they will be addressed. JCB's authorization host system will be renewed around the end of 2021, therefore a system freeze period will be scheduled for 2 months prior to its release. During this freeze period, it will not be possible for external parties to establish a new system connection to JCB's authorization system; all new parties' access will be deferred until completion of such work. During the freeze period, there will be no service interruption towards existing accessors.</p>
GD3.3.3 Details of any anticipated future developments, material updates or changes to <i>access requirements</i>.	
GD3.3.3f details of any anticipated future developments that you may require or material updates or changes to your access requirements	<p>➤ <u>Suggested Limit: 300 Words</u></p> <p>There are no anticipated future developments required or material updates/changes that affect access requirements.</p>