

Banking Competition Remedies Limited

Annual Report 2020

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INTRODUCTION

Banking Competition Remedies Ltd

Banking Competition Remedies Ltd (BCR) is the independent body established in 2017 and mobilised in 2018 to implement the £775 million NatWest, formerly Royal Bank of Scotland (RBS), State Aid Alternative Remedies Package (ARP) (see below) agreed between the UK Government, RBS and the European Commission.

BCR's work is overseen by Mazars, an external Monitor appointed by, and reporting to, HM Treasury.

The Alternative Remedies Package

In 2009, the European Commission approved State Aid measures granted to The Royal Bank of Scotland Group plc (RBS). This approval was given on the basis of a restructuring plan submitted by RBS and commitments given by the UK Government in 2009 and subsequently amended in 2014, including the divestment of a part of RBS's branch-based retail and small and medium-sized enterprise (SME) business, which later became known as 'Williams & Glyn' (the "Divestment").

Following challenges in achieving the Divestment, the UK Government proposed substituting for the remaining 2014 commitments a revised package of measures with the aim of promoting competition in the market for banking services to SMEs.

The ARP was agreed in principle in July 2017 and formally approved by the European Commission on 18 September 2017.

PURPOSE AND OBJECTIVES

BCR's purpose is to implement the Alternative Remedies Package as agreed between the European Commission and HM Treasury.

BCR had no involvement in the design of the eligibility criteria for applicants, the timelines for delivery, the legal agreements to be entered into, the sums to be disbursed or the associated processes for those engaging with the two workstreams, the Capability and Innovation Fund and the Incentivised Switching Scheme. These matters were worked out and agreed between the UK Government and the European Commission.

The primary objectives of BCR are to:

1. Provide information to applicants and other interested parties in respect of the Capability and Innovation Fund and the Incentivised Switching Scheme
2. Manage and disburse the Capability and Innovation Fund to eligible applicants (Eligible Bodies)
3. Administer dowry payments to Eligible Bodies and oversee the delivery of the Incentivised Switching Scheme (including RBS's delivery of its obligations in connection with the Incentivised Switching Scheme)
4. Monitor compliance by Eligible Bodies with the terms of the agreements governing the use of funds
5. Report publicly on the Alternative Remedies Package (including how funding has been applied).

CHAIRMAN'S STATEMENT

Welcome to the second Annual Report of Banking Competition Remedies (BCR) covering the year from April 2019 to April 2020, but also reflecting activities up to October 2020.

This report covers the activities of the two BCR workstreams – the Incentivised Switching Scheme (ISS) and the Capability and Innovation Fund (CIF) - as well as our audited financial statements.

In order to provide an up to date view of BCR's activities, and consistent with the approach adopted in last year's report, the narrative sections below include activities undertaken up to October 2020.

Achieving the milestones set out below has been as a result of a great effort by all BCR staff, directors and our advisers as well as those involved at HM Treasury, NatWest, ISS participating bodies and CIF awardees. Every deadline has been met and within budget. All this in the face of the once-per-generation economic, social and political challenges from both Brexit and in 2020, Covid-19.

From start-up to roll-out

While BCR's initial 12 months (to April 2019) was an intensive period of mobilisation, the second year and beyond has seen the roll-out of the two workstreams so that:

- The Incentivised Switching Scheme doubled the SME switching rate through CASS – a significant achievement - and in July BCR announced plans for an extension of ten months and provided access to a wider pool of eligible customers, taking the scheme to its conclusion in June 2021.
- The Capability and Innovation Fund awarded grants of £425 million by means of four pools, each of which had a defined purpose, to a wide range of organisations, including banks and FinTechs who are now using these funds to support the development of both innovative services and capabilities to enhance competition in the SME banking market.

Further funding round

- As envisaged in the original ARP processes, a further funding round (Pool E) was created to redeploy £100m after Metro Bank PLC and Nationwide Building Society each returned £50m to BCR after their own internal strategic reviews indicated a change in business direction in altered economic circumstances.
- Following a consultation on award sizes, these funds have now been distributed across a portfolio of organisations including challenger banks and FinTechs to develop their propositions in increasing competition for UK SMEs.

Holding awardees to account

All awardees report regularly to BCR, including face-to-face meetings (online since the onset of Covid-19) to review performance and, where appropriate, consider revisions to plans in the light of market developments. Needless to say, Covid-19 and the ensuing economic environment has placed major challenges on every business in the Financial Services sector and BCR awardees are not immune to that. In all cases we continue to have a dialogue with awardees to ensure that their Public Commitments remain relevant in the new environment.

A particular feature of BCR's approach to transparency has been the use of 'Public Commitments'. Each awardee is required to provide not only Public Commitments as to what they will deliver in return for funding, but also regular public updates on performance. These are all published by BCR on its website at <https://bcr-ltd.com/public-commitments>

This public transparency enables anyone to see how each awardee is progressing and then to approach awardees directly if they wish to do so. BCR has a limited lifespan and the Public Commitments will provide a lasting measure after our work is complete of what was promised and what has been delivered.

While BCR is required to respect the commercial confidentiality of information provided in bids and subsequent reporting, we have kept Mazars, the external Monitor appointed by HM Treasury, informed at all stages of the design and implementation of our processes. This includes their attendance at all board and other key decision and discussion meetings (including with awardees). We report regularly to the Monitor both in writing as well as holding face-to-face discussions. In addition to reports from Mazars to HM Treasury, we also maintain a direct line of contact with HM Treasury.

BCR also writes regularly to the Economic Secretary to the Treasury and the Chair of the Treasury Select Committee (TSC) to keep them abreast of developments. Key correspondence is published on the TSC website.

BCR provides detailed explanations of how decisions are made on both ISS and CIF on its website.

BCR has also produced regular updates and press releases to ensure public availability of up-to-date information.

MEETING BCR's OBJECTIVES

The specific objectives of BCR are set out in the introduction above.

The first two objectives – providing information on ISS and CIF; and disbursement of the CIF funding – were completed during the year to 30 April 2020, with Pool E being disbursed in August and September 2020 as described above.

The third and fourth objectives – operation of the 'dowry' element of ISS and monitoring of CIF recipient bodies – have continued as BCR has transitioned from being a bid-assessment and award granting body, to a body focused on implementation of post-award activities.

This Annual Report, along with our website and other BCR public announcements, as described above, address the final objective of public reporting.

The overall objective of BCR is to implement the Alternative Remedies Package such that the UK's State Aid commitments are met, coupled with an ambition that seeks to increase and expand competition among providers of financial services to SMEs.

The lifetime of the company is limited solely to the period of implementing the ARP (and Winding Up must commence no later than 25th April 2023).

Both ISS and CIF have drawn substantial interest and engagement across a wide range of organisations – participants in ISS can be viewed at <https://bcr-ltd.com/iss/> and CIF awardees and awards at <https://bcr-ltd.com/cif/>

To move the dial on competition for SMEs in the UK financial services market was always a substantial ambition. BCR has sought to address it through a broadly-based portfolio of participants and awardees stimulating choice for SMEs in addressing their needs for financial services. It is a given that in making awards to some applicants, and inevitably rejecting even more applicants, we cannot please everyone. Nor can we guarantee success in every case. However, as we review progress against Public Commitments, it is clear that BCR and the ARP have indeed created new opportunities for SMEs to meet their requirements. This will be the lasting legacy of BCR and the ARP of which all involved will be justifiably proud in the future.

INCENTIVISED SWITCHING SCHEME

In the reporting period to end April 2020, the Incentivised Switching Scheme made a considerable difference in the switching rates for SMEs through CASS and accounted for some 50% of total volume in this sector. Progress was closely monitored throughout both in terms of attractiveness of the offers and the customer experience during the process of transferring accounts. To accommodate organisations that were unable to meet all the Eligibility Criteria in the first round, further applications to join were invited in mid-2019, resulting in one more bank being admitted.

Switching performance (see table below) in the first full year of operation was positive against historic switching rates for SMEs, but lower than might have been expected bearing in mind the attractive incentives available. As a consequence, a trial improvement in the dowry available to customers in Bands 1 and 2 was made towards the end of 2019. Its success resulted in retrospective increases in Business Current Account dowries for customers in Bands 1-4 and for all customers switching loan accounts with effect from the beginning of April 2020.

The table below should be read with the following comment in mind. ISS operates with close attention to two key metrics, namely the overall Business Current Account Switch Dowry of £225m (plus a further £50m for loans) and the Business Current Account Switch target of 120,000 customers. ISS will cease either at its now agreed end date of 30th June 2021 or when either the BCA Switch Dowry or the BCA Switch Target is met.

Of the £275m available for incentivising switches, at the date of publication some £145m has been deployed.

ISS Agreements signed April 2020	ISS Agreements signed October 2020	Offers available to Target Customers April 2020	Offers available to Target Customers October 2020	Target Customers switched April 2020	Target Customers switched September 2020	BCA and Loan Dowry paid out September 2020*
11	9	10	9	33,613	39,214	£145,128,692

*In respect of switched accounts as at the end of August 2020

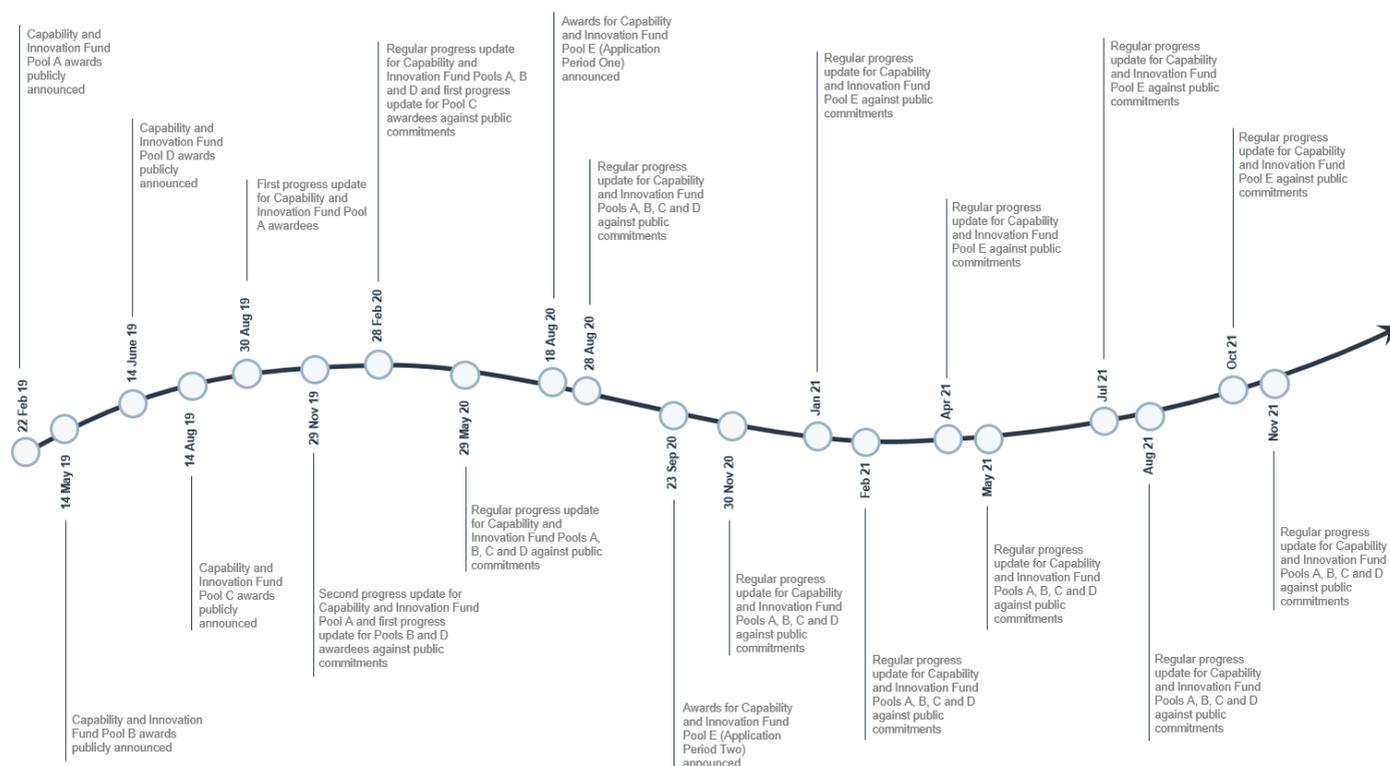
The original design of the Incentivised Switching Scheme which BCR was tasked with administering (but not designing) allowed for an extension of the period which ISS would be available as well as a widening of the customer pool within NatWest which would be able to participate. The decisions in respect of these were subject to certain conditions and were scheduled to take place six months apart in the latter half of 2020. With support from HM Treasury and the EU Commission, BCR and NatWest were able to agree a consolidation of these two events which resulted in an extension in the Scheme to end June 2021 and for it to be made available to a further 200,000 customers in Bands 1-4. This came into force in August 2020 and early signs are that it has been well received.

There have been two withdrawals from ISS to record:-

1. Just before the reporting year end (April 2020), Nationwide Building Society revised its business strategy and informed BCR that it was no longer planning to offer a Business Current Account. As such, its Incentivised Switching Agreement was allowed to expire on 25th August 2020.
2. Santander UK plc decided not to participate in the perimeter and date extension so that it could prioritise its existing customers and support them through the economic impacts of Covid-19. As a result of this its Incentivised Switching Agreement expired on 25th August 2020.

CAPABILITY AND INNOVATION FUND

It has been a busy year for BCR with the Capability and Innovation Fund. In addition to the regular reporting for awardees, BCR has also seen the return of £100m of CIF awards and completion of 2 application periods for Pool E.



At the time of this annual report, we are now into our 6th reporting period for Pool A Bodies, 5th reporting period for Pool B and D Bodies and the 4th reporting period for Pool C Bodies. All Public Commitments progress will be updated at the end of November 2020. As highlighted in the Chair’s overview, BCR has rigorously monitored awardees’ compliance with their business cases in deployment of the CIF awards. It has also held Review meetings with all awardees as required by the CIF Agreement and additionally put in place regular reviews with many of the awardees.

The CIF Agreement allows for Updated and Revised Business cases to be submitted to BCR and during the last year we have received eight such business cases mainly in line with Review Meetings. It should be noted that any change to the original business case requires an Updated or Revised Business Case. Two of these business cases, namely Metro Bank PLC’s and Nationwide Building Society’s resulted in the return of £100m of CIF funds and we, therefore, established Pool E on accelerated timelines. In respect of the rest, where changes impacted Public Commitments, these were updated on BCR’s website.

Ahead of outlining the details of Pool E, BCR conducted a consultation in the market with potential awardees and, as a result, agreed that the awards would be deployed as follows:

Awards of £35m, £25m and 2 x £10m making a total of £80m available to bodies originally eligible for Pools A, B and C.

Awards of 2 x £5m and 4 x £2.5m making a total of £20m available to bodies originally eligible for Pool D. Under the ARP rules, this was the maximum proportion of funds that could be allocated to Pool D bodies through an additional CIF Process.

Pool E attracted some 170 applications from 131 organisations across the two application windows and, given the quality of business cases, it was a challenge for the BCR Board to narrow these down to 10 successful

awardees. The impacts of Covid-19 were clearly seen from applicants in the Pool E process who outlined solutions to changing SME priorities in the current unprecedented environment. Key themes in a difficult economic environment for SMEs and also for financial providers across the market included continued focus on alternative lending sources, digitisation of the SME customer journeys, cash flow optimisation and solutions for larger SMEs including international trading solutions.

The winners of both application period one [Funding Xchange Ltd (£5m), Onfido Limited (£5m), Codat Limited (£2.5m), ezbob Ltd (£2.5m), Fractal Labs Ltd (£2.5m) and Previsio Ltd (£2.5m)] and application period two [Virgin Money UK PLC (£35m), ClearBank Ltd (£25m), Ebury Partners Limited (£10m) and MarketFinance Limited (£10m)] will all submit their first reports to BCR in December with their Public Commitment updates available on the BCR website at the end of January 2021.

BCR is also seeing the impact of the current global pandemic and its resulting economic impact coming through in business cases for existing awardees. Recognising that the key purpose of the Capability and Innovation Fund is to enable competition for SMEs in the UK market, BCR sees it as a positive development that existing awardees are making changes to the prioritisation of their projects to ensure that they continue to meet changing SME needs. While it is good to see that a number of awardees are able to deploy their awards as originally envisaged, as the pandemic persists, BCR also expects to see further changes to business cases through 2021 and will continue to robustly analyse and challenge awardees' efforts to ensure the needs of the SMEs are at the forefront of any reprioritisation. Approval of such business cases may of course have a knock-on impact on deployment of the CIF awards beyond originally anticipated timelines, but this is not unexpected given the challenges that all suppliers of financial services are facing. BCR will have a fuller view of any potential impact after the next reporting cycle in November 2020.

Despite the challenging market, with the benefit of their CIF awards, a number of organisations have made significant strides in delivering solutions that improve options and outcomes for UK SMEs. It should be recognised that in these unprecedented times where SME needs have substantially changed, a number of awardees have been successfully accredited for the CBILs and BBLs schemes and some have included this lending within their BCR achievements. An overview of awardee achievements (published on 28 August 2020) is listed below and more detail can be found on BCR's website at <https://bcr-ltd.com/public-commitments/>

Pool A Bodies

(£100m) Starling Bank Ltd has created new lending products, including unsecured loans, and has lent £765m to UK SMEs. It has also partnered and integrated with an additional 18 partners in its Marketplace, and has attracted over 180,000 SME customers since the beginning of the scheme. It has also launched CBILs and BBLs to provide vital support to SME customers impacted by Covid-19.

(£70m) Metro Bank PLC has opened 3 stores in the North of England, created 60 jobs, and earlier this year launched direct debits, receipt management and physical sweeping for SMEs. It also partnered with ezbob Ltd, a recent Pool E awardee, to deliver a next generation small business loans platform.

(£60m) ClearBank Ltd has exceeded 3% market share with c.200,000 members and is now the third largest business banking challenger. Through its increased marketing focus, the Tide brand is now known to 30% of SME population. In September, ClearBank Ltd achieved a further £25m award in Pool E.

Pool B Bodies

(£15m) Investec Bank Plc has continued to develop its product offering with over 1300 SMEs now using its new online deposit and FX capability. It has also been formally accredited to Coronavirus Business Interruption Loans (CBILs) and Bounce Back Loans (BBLs) and it offered up to 6 months of deferred payments to its SME clients to support them through the lockdown period.

(£15m) The Co-operative Bank Plc is fully on track to launch same day onboarding for sole traders and single director limited companies and has moved into the design and delivery stages of the launch of its new credit card product. Like a number of awardees, it has launched CBILS and BBLs to provide vital support to SME customers impacted by Covid-19.

Pool C Bodies

(£10m) Atom Bank PLC has delivered the underlying infrastructure for its small business app together with its strategic partner, Thought Machine. In addition, it has built a pricing engine that generates a quote on secured lending applications within 60 seconds and has responded to the challenge of COVID-19 by introducing a secured lending CBILS product.

(£10m) The Currency Cloud Group Ltd has processed cross border payments for over 4% of UK SMEs trading internationally. It has launched CurrencySpark, its multi-currency solution for financial institutions, and become the first non-bank organisation to introduce self-service payment tracking via API, allowing customers to track their international payments. It has also optimised its payment network, providing customers with a more affordable alternative to international payments.

(£10m) iwoca Ltd has used the technology it has developed for No Personal Guarantee Loans to offer CBILS in line with market demand in addition to its No PG offering. It also launched iwocaPay as an alternative to invoice financing.

(£10m) Modulr Finance Limited has hired 49 people to date, of which 44 are highly skilled jobs in Edinburgh. It launched its Payment Initiation Service Provider which provides benefits to SMEs such as, lower fraud, faster settlement and lower costs of payments. Modulr Finance Ltd continues to onboard partners on its Payment as a Service solution.

Pool D Bodies

(£5m) Codat Limited has developed its platform which now enables financial products to integrate with partners such as Xero, Quickbooks and Sage. It has successfully rolled out the first iterations of its Enablement and Access programmes which resulted in a number of participants offering accounting integrations as a permanent feature. In the wake of Covid-19, it built a scalable application journey for Tier 1 and 2 lenders enabling £15.3bn of funding applications across all lending schemes. In August, Codat Limited was awarded an additional £2.5m in Pool E.

(£5m) Fluidly Limited launched its financial service marketplace which allows SMEs instant access to pre-qualified loan offers from over 20 lenders. It has also introduced initiatives to help SMEs manage its cashflow such as, chasing debtors and supporting financial decision making and it is working with more than 35 of the Top 100 Accounting firms in the UK.

(£5m) Form3 Ltd has now gone live with its domestic payments processing for Faster Payments, Bacs and SEPA providing benefits to thousands of SMEs in the UK. It is in the process of rolling out advanced features for International Payments with FX services to further support SMEs with imports and exports.

(£5m) Funding Options Limited has facilitated more than £115m of new lending to UK SMEs exceeding all targets for new alternative lending. It launched Open Banking in Q1 benefitting SMEs and lenders by driving greater efficiency. It has doubled the number of SME visitors to its website and is on target to exceed 1m in 2020.

(£5m) Swoop Finance Limited launched its new virtual CFO, with some 50,000 SMEs signing up to access loans, grants and investments whilst making savings across utilities, banking and FX. Over 19,000 funding applications have been received through the platform resulting in £179m in finance raised and saved.

BCR is delighted to see the breadth and depth of new solutions CIF Awardees are bringing to the market, enabling SMEs of all turnover sizes right across the UK to take advantage of more competition in the provision of services that will help them succeed and indeed thrive in this difficult environment.

FINANCE, RISK MANAGEMENT AND OPERATIONS

Following last year which was an intensive start-up period, BCR continues to review, monitor and maintain its core values and policies, supported by the BCR team and external providers, as well as ensuring the continual scrutiny and review of the financial, risk management and operating systems needed to run the organisation and to handle securely the significant sums involved.

Its finances are still in good shape and it has operated well within the budget available. All the indications are that the funding available to BCR will be sufficient for it to deliver its core objectives. The auditors have issued an unqualified audit opinion. BCR's accounts (together with those of the Alternative Remedies Package Trust for which BCR is corporate trustee) can be found later in this report.

As a small company responsible for large sums of money, great attention has been paid to maintaining an effective risk management environment including the continual review of core policies together with controls which are regularly tested.

Richard Anderson – Chairman

Aidene Walsh – Executive Director

Brendan Peilow – Executive Director

John Howard – Non-Executive Director

Banking Competition Remedies Limited

**Annual report and financial statements for
the year ended 30 April 2020**

Banking Competition Remedies Limited

Company information

Directors Brendan Peilow
 Aidene Walsh
 John Howard (non-executive
 director)
 Richard Anderson (non-executive (Appointed 13 January 2020)
 director)

Company number 11001491

Registered office 84 Eccleston Square
 London
 SW1V 1PX

Independent auditor Saffery Champness LLP
 St Catherine's Court
 Berkeley Place
 Clifton
 Bristol
 BS8 1BQ

Banking Competition Remedies Limited

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Banking Competition Remedies Limited

Directors' report For the year ended 30 April 2020

The directors present their annual report and financial statements for the year ended 30 April 2020.

Principal activities

The company was incorporated on 6 October 2017 with its principal activity of ensuring the implementation of the Alternative Remedies Package ("ARP") of measures agreed between the UK Government and the European Commission. The company is not set up to make profit but instead receives funding to cover the costs incurred in fulfilling its purpose. The lifetime of the company is limited solely to the period of implementing the ARP (and Winding Up must commence no later than 25th April 2023).

Directors

The directors who held office during the year and up to the date of signature of the financial statements were as follows:

Godfrey Cromwell	(Resigned 30 September 2020)
Brendan Peilow	
Aidene Walsh	
Nigel Vooght (non-executive director)	(Resigned 24 May 2019)
John Howard (non-executive director)	
Richard Anderson (non-executive director)	(Appointed 13 January 2020)

Auditor

Saffery Champness LLP were appointed as auditor to the company and in accordance with section 485 of the Companies Act 2006, a resolution proposing that they be re-appointed will be put at a General Meeting.

Statement of disclosure to auditor

So far as each person who was a director at the date of approving this report is aware, there is no relevant audit information of which the company's auditor is unaware. Additionally, the directors individually have taken all the necessary steps that they ought to have taken as directors in order to make themselves aware of all relevant audit information and to establish that the company's auditor is aware of that information.

This report has been prepared in accordance with the provisions applicable to companies entitled to the small companies exemption.

On behalf of the board

Brendan Peilow
Director

Date: 26 October 2020

Banking Competition Remedies Limited

Directors' responsibilities statement For the year ended 30 April 2020

The directors are responsible for preparing the annual report and the financial statements in accordance with applicable law and regulations.

Company law requires the directors to prepare financial statements for each financial year. Under that law the directors have elected to prepare the financial statements in accordance with United Kingdom Generally Accepted Accounting Practice (United Kingdom Accounting Standards and applicable law). Under company law the directors must not approve the financial statements unless they are satisfied that they give a true and fair view of the state of affairs of the company and of the surplus or deficit of the company for that period. In preparing these financial statements, the directors are required to:

- select suitable accounting policies and then apply them consistently;
- make judgements and accounting estimates that are reasonable and prudent;
- prepare the financial statements on the going concern basis unless it is inappropriate to presume that the company will continue in business.

The directors are responsible for keeping adequate accounting records that are sufficient to show and explain the company's transactions and disclose with reasonable accuracy at any time the financial position of the company and enable them to ensure that the financial statements comply with the Companies Act 2006. They are also responsible for safeguarding the assets of the company and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.

Banking Competition Remedies Limited

Independent auditor's report

To the members of Banking Competition Remedies Limited

Opinion

We have audited the financial statements of Banking Competition Remedies Limited (the 'company') for the year ended 30 April 2020 which comprise the statement of comprehensive income, the statement of financial position, the statement of changes in equity and notes to the financial statements, including a summary of significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards, including FRS 102 The Financial Reporting Standard applicable in the UK and Republic of Ireland (United Kingdom Generally Accepted Accounting Practice).

In our opinion the financial statements:

- give a true and fair view of the state of the company's affairs as at 30 April 2020 and of its surplus for the year then ended;
- have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice; and
- have been prepared in accordance with the requirements of the Companies Act 2006.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the financial statements section of our report. We are independent of the company in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Conclusions relating to going concern

We have nothing to report in respect of the following matters in relation to which the ISAs (UK) require us to report to you where:

- the directors' use of the going concern basis of accounting in the preparation of the financial statements is not appropriate; or
- the directors have not disclosed in the financial statements any identified material uncertainties that may cast significant doubt about the company's ability to continue to adopt the going concern basis of accounting for a period of at least twelve months from the date when the financial statements are authorised for issue.

Banking Competition Remedies Limited

Independent auditor's report (continued)

To the members of Banking Competition Remedies Limited

Other information

The directors are responsible for the other information. The other information comprises the information included in the annual report, other than the financial statements and our auditor's report thereon. Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the financial statements or a material misstatement of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

Opinions on other matters prescribed by the Companies Act 2006

In our opinion, based on the work undertaken in the course of our audit:

- the information given in the directors' report for the financial year for which the financial statements are prepared is consistent with the financial statements; and
- the directors' report has been prepared in accordance with applicable legal requirements.

Matters on which we are required to report by exception

In the light of the knowledge and understanding of the company and its environment obtained in the course of the audit, we have not identified material misstatements in the directors' report.

We have nothing to report in respect of the following matters where the Companies Act 2006 requires us to report to you if, in our opinion:

- adequate accounting records have not been kept, or returns adequate for our audit have not been received from branches not visited by us; or
- the financial statements are not in agreement with the accounting records and returns; or
- certain disclosures of directors' remuneration specified by law are not made; or
- we have not received all the information and explanations we require for our audit; or
- the directors were not entitled to prepare the financial statements in accordance with the small companies regime and take advantage of the small companies' exemption in preparing the directors' report and take advantage of the small companies exemption from the requirement to prepare a strategic report.

Banking Competition Remedies Limited

Independent auditor's report (continued) To the members of Banking Competition Remedies Limited

Responsibilities of directors

As explained more fully in the directors' responsibilities statement, the directors are responsible for the preparation of the financial statements and for being satisfied that they give a true and fair view, and for such internal control as the directors determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the directors are responsible for assessing the company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the directors either intend to liquidate the company or to cease operations, or have no realistic alternative but to do so.

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at: <http://www.frc.org.uk/auditorsresponsibilities>. This description forms part of our auditor's report.

Use of our report

This report is made solely to the company's members, as a body, in accordance with Chapter 3 of Part 16 of the Companies Act 2006. Our audit work has been undertaken so that we might state to the company's members those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the company and the company's members, as a body, for our audit work, for this report, or for the opinions we have formed.

Neil Davies (Senior Statutory Auditor)
for and on behalf of Saffery Champness LLP

26 October 2020

Chartered Accountants
Statutory Auditors

St Catherine's Court
Berkeley Place
Clifton
Bristol
BS8 1BQ

Banking Competition Remedies Limited

Statement of comprehensive income For the year ended 30 April 2020

		2020	2019
		£'000	as restated £'000
Income		2,521	4,459
Administrative expenses		(2,536)	(4,465)
Operating deficit	3	(15)	(6)
Interest receivable and similar income	6	19	8
Surplus before taxation		4	2
Tax expense		(4)	(2)
Surplus for the financial year		-	-

The income and expenditure account has been prepared on the basis that all operations are continuing operations.

Banking Competition Remedies Limited

Statement of financial position

As at 30 April 2020

Notes	2020		2019 as restated	
	£'000	£'000	£'000	£'000
Fixed assets				
Tangible assets	7	13		24
Current assets				
Debtors	8	42	35	
Cash at bank and in hand		5,361	2,867	
		<u>5,403</u>	<u>2,902</u>	
Creditors: amounts falling due within one year	9	<u>(5,416)</u>	<u>(2,926)</u>	
Net current liabilities			(13)	(24)
Total assets less current liabilities			<u>-</u>	<u>-</u>

These financial statements have been prepared in accordance with the provisions applicable to companies subject to the small companies regime.

The financial statements were approved by the board of directors and authorised for issue on 22 October 2020 and are signed on its behalf by:

Brendan Peilow
Director

Company Registration No. 11001491

Banking Competition Remedies Limited

**Statement of changes in equity
For the year ended 30 April 2020**

**Income and expenditure
£'000**

As restated for the period ended 30 April 2019:

Balance at 1 May 2018	(731)
Effect of prior year adjustment	731

As restated -

Year ended 30 April 2019:

Profit and total comprehensive income for the year -

Balance at 30 April 2019 -

Year ended 30 April 2020:

Profit and total comprehensive income for the year -

Balance at 30 April 2020 -

Banking Competition Remedies Limited

Notes to the financial statements For the year ended 30 April 2020

1 Accounting policies

Company information

Banking Competition Remedies Limited is a private company limited by guarantee incorporated in England and Wales. The registered office is 84 Eccleston Square, London, SW1V 1PX.

1.1 Accounting convention

These financial statements have been prepared in accordance with FRS 102 “The Financial Reporting Standard applicable in the UK and Republic of Ireland” (“FRS 102”) and the requirements of the Companies Act 2006.

The financial statements are prepared in sterling, which is the functional currency of the company. Monetary amounts in these financial statements are rounded to the nearest £1,000.

The financial statements have been prepared under the historical cost convention. The principal accounting policies adopted are set out below.

1.2 Going concern

At the time of approving the financial statements, the directors have a reasonable expectation that the company has adequate resources and support to continue in operational existence. Thus the directors continue to adopt the going concern basis of accounting in preparing the financial statements.

1.3 Income and expenditure

Income represents cash received to cover the costs incurred in fulfilling its principal activity and is recognised in the year in which the costs occur.

Interest earned on any cash balances is recognised as income in the period to which it relates.

Expenses include VAT where applicable as the company is not VAT registered and therefore cannot reclaim it.

1.4 Tangible fixed assets

Tangible fixed assets are initially measured at cost and subsequently measured at cost or valuation, net of depreciation and any impairment losses.

Depreciation is recognised so as to write off the cost or valuation of assets less their residual values over their useful lives on the following bases:

Fixtures and fittings	33% straight line
Computers	33% straight line

The gain or loss arising on the disposal of an asset is determined as the difference between the sale proceeds and the carrying value of the asset, and is credited or charged to surplus or deficit.

Banking Competition Remedies Limited

Notes to the financial statements (continued)

For the year ended 30 April 2020

1 Accounting policies (continued)

1.5 Impairment of fixed assets

At each reporting period end date, the company reviews the carrying amounts of its tangible assets to determine whether there is any indication that those assets have suffered an impairment loss. If any such indication exists, the recoverable amount of the asset is estimated in order to determine the extent of the impairment loss (if any). Where it is not possible to estimate the recoverable amount of an individual asset, the company estimates the recoverable amount of the cash-generating unit to which the asset belongs.

Recoverable amount is the higher of fair value less costs to sell and value in use. In assessing value in use, the estimated future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset for which the estimates of future cash flows have not been adjusted.

If the recoverable amount of an asset (or cash-generating unit) is estimated to be less than its carrying amount, the carrying amount of the asset (or cash-generating unit) is reduced to its recoverable amount. An impairment loss is recognised immediately in surplus or deficit, unless the relevant asset is carried at a revalued amount, in which case the impairment loss is treated as a revaluation decrease.

Recognised impairment losses are reversed if, and only if, the reasons for the impairment loss have ceased to apply. Where an impairment loss subsequently reverses, the carrying amount of the asset (or cash-generating unit) is increased to the revised estimate of its recoverable amount, but so that the increased carrying amount does not exceed the carrying amount that would have been determined had no impairment loss been recognised for the asset (or cash-generating unit) in prior years. A reversal of an impairment loss is recognised immediately in surplus or deficit, unless the relevant asset is carried at a revalued amount, in which case the reversal of the impairment loss is treated as a revaluation increase.

1.6 Financial instruments

The company has elected to apply the provisions of Section 11 'Basic Financial Instruments' and Section 12 'Other Financial Instruments Issues' of FRS 102 to all of its financial instruments.

Financial instruments are recognised in the company's statement of financial position when the company becomes party to the contractual provisions of the instrument.

Financial assets and liabilities are offset, with the net amounts presented in the financial statements, when there is a legally enforceable right to set off the recognised amounts and there is an intention to settle on a net basis or to realise the asset and settle the liability simultaneously.

Basic financial assets

Basic financial assets are initially measured at transaction price including transaction costs and are subsequently carried at amortised cost using the effective interest method unless the arrangement constitutes a financing transaction, where the transaction is measured at the present value of the future receipts discounted at a market rate of interest. Financial assets classified as receivable within one year are not amortised.

Banking Competition Remedies Limited

Notes to the financial statements (continued)

For the year ended 30 April 2020

1 Accounting policies (continued)

Impairment of financial assets

Financial assets are assessed for indicators of impairment at each reporting end date.

Financial assets are impaired where there is objective evidence that, as a result of one or more events that occurred after the initial recognition of the financial asset, the estimated future cash flows have been affected. If an asset is impaired, the impairment loss is the difference between the carrying amount and the present value of the estimated cash flows discounted at the asset's original effective interest rate. The impairment loss is recognised in surplus or deficit.

Classification of financial liabilities

Financial liabilities and equity instruments are classified according to the substance of the contractual arrangements entered into. An equity instrument is any contract that evidences a residual interest in the assets of the company after deducting all of its liabilities.

Basic financial liabilities

Basic financial liabilities are initially recognised at transaction price unless the arrangement constitutes a financing transaction, where the debt instrument is measured at the present value of the future payments discounted at a market rate of interest. Financial liabilities classified as payable within one year are not amortised.

1.7 Taxation

The company is exempt from claiming trading losses on the basis that it is a company not carrying on a business for the purposes of making a profit. Tax is payable on any interest income received.

1.8 Employee benefits

The costs of short-term employee benefits are recognised as a liability and an expense, unless those costs are required to be recognised as part of the cost of stock or fixed assets.

The cost of any unused holiday entitlement is recognised in the period in which the employee's services are received.

1.9 Retirement benefits

Payments to defined contribution retirement benefit schemes are charged as an expense as they fall due.

1.10 Leases

Rentals payable under operating leases, including any lease incentives received, are charged to profit or loss on a straight line basis over the term of the relevant lease except where another more systematic basis is more representative of the time pattern in which economic benefits from the leases asset are consumed.

Banking Competition Remedies Limited

Notes to the financial statements (continued) For the year ended 30 April 2020

2 Critical accounting judgements and key sources of estimation uncertainty

In the application of the company's accounting policies, the directors are required to make judgements, estimates and assumptions about the carrying amount of assets and liabilities that are not readily apparent from other sources. The estimates and associated assumptions are based on historical experience and other factors that are considered to be relevant. Actual results may differ from these estimates.

The estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognised in the period in which the estimate is revised where the revision affects only that period, or in the period of the revision and future periods where the revision affects both current and future periods.

3 Operating deficit

	2020	2019
	£'000	£'000
Operating deficit for the year is stated after charging:		
Fees payable to the company's auditor for the audit of the company's financial statements	9	10
Depreciation of owned tangible fixed assets	11	11
Operating lease charges	244	249
Non-audit fees	2	2
	<u> </u>	<u> </u>

4 Employees

The average monthly number of persons (including directors) employed by the company during the year was:

	2020	2019
	Number	Number
Administration	10	9
	<u> </u>	<u> </u>
Their aggregate remuneration comprised:	2020	2019
	£'000	£'000
Wages and salaries	758	667
Social security costs	88	81
Pension costs	9	6
	<u> </u>	<u> </u>
	<u>855</u>	<u>754</u>

Banking Competition Remedies Limited

**Notes to the financial statements (continued)
For the year ended 30 April 2020**

5 Directors' remuneration

	2020	2019
	£'000	£'000

Remuneration for qualifying services	386	350
	<u> </u>	<u> </u>

Remuneration disclosed above include the following amounts paid to the highest paid director:

	2020	2019
	£'000	£'000

Remuneration for qualifying services	132	130
	<u> </u>	<u> </u>

6 Interest receivable and similar income

	2020	2019
	£'000	£'000

Interest income

Interest on bank deposits	19	8
	<u> </u>	<u> </u>

Investment income includes the following:

Interest on financial assets not measured at fair value through surplus or deficit	19	8
	<u> </u>	<u> </u>

Banking Competition Remedies Limited

Notes to the financial statements (continued) For the year ended 30 April 2020

7 Tangible fixed assets

	Fixtures and fittings £'000	Computers £'000	Total £'000
Cost			
At 1 May 2019 and 30 April 2020	1	34	35
Depreciation and impairment			
At 1 May 2019	-	11	11
Depreciation charged in the year	-	11	11
At 30 April 2020	-	22	22
Carrying amount			
At 30 April 2020	1	12	13
At 30 April 2019	1	23	24

8 Debtors

	2020 £'000	2019 £'000
Amounts falling due within one year:		
Other debtors	5	5
Prepayments and accrued income	37	30
	42	35

9 Creditors: amounts falling due within one year

	2020 £'000	2019 £'000
Trade creditors	113	46
Corporation tax	4	2
Other taxation and social security	25	33
Deferred income	10	2,824
Accruals	50	21
	5,416	2,926

Banking Competition Remedies Limited

Notes to the financial statements (continued) For the year ended 30 April 2020

10 Deferred income

	2020	2019
	£'000	£'000
Payments received in advance	5,224	2,824

11 Retirement benefit schemes

	2020	2019
	£'000	£'000
Defined contribution schemes		
Charge to profit or loss in respect of defined contribution schemes	9	6

The company operates a defined contribution pension scheme for all qualifying employees. The assets of the scheme are held separately from those of the company in an independently administered fund.

12 Members' liability

The company is limited by guarantee, not having a share capital and consequently the liability of members is limited, subject to an undertaking by each member to contribute to the net assets or liabilities of the company on winding up such amounts as may be required not exceeding £1.

13 Operating lease commitments

Lessee

At the reporting end date the company had outstanding commitments for future minimum lease payments under non-cancellable operating leases, which fall due as follows:

	2020	2019
	£'000	£'000
Within one year	247	242

Banking Competition Remedies Limited

Notes to the financial statements (continued)

For the year ended 30 April 2020

14 Prior period adjustment

The budget for BCR was established at the outset and the total for the whole life of the company paid by RBS (now NatWest) into an escrow account at the Bank of England administered by the independent Monitor, Mazars. Predetermined amounts for each year are paid from the escrow account on the instructions of Mazars into the business current account of BCR at HSBC. The money is used solely to cater for the annual operating expenses of BCR in its role of administering the Incentivised Switching Scheme and the Capability and Innovation Fund in its role as corporate trustee to the Alternative Remedies Package Trust.

The prior year adjustment follows an internal review of all the related documentation in respect of the total monies paid into the Escrow Account at the outset and their accounting treatment when paid annually to BCR. After consideration, the directors have deemed it more appropriate that the annual receipt is treated as income rather than capital with any in-year surplus treated as deferred income against future expenses. There is no impact on the cashflow of BCR.

Changes to the statement of financial position

	<i>As previously reported</i>	<i>Adjustment</i>	<i>As restated at 30 Apr 2019</i>
	£'000	£'000	£'000
Creditors due within one year			
Deferred income	-	(2,824)	(2,824)
Net assets	2,824	(2,824)	-
Capital and reserves			
Other reserves	8,013	(8,013)	-
Income and expenditure account	(5,189)	5,189	-
Total equity	2,824	(2,824)	-

Changes to the income statement

	<i>As previously reported</i>	<i>Adjustment</i>	<i>As restated</i>
	£'000	£'000	£'000
Creditors due within one year			
Turnover	-	4,459	4,459
(Deficit)/surplus for the financial period	(4,459)	4,459	-

The Alternative Remedies Package Trust

Unaudited financial statements
for the year ended 5 April 2020

The Alternative Remedies Package Trust

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The Alternative Remedies Package Trust

Trust summary

Date of settlement	25 April 2018
Settlor	Royal Bank of Scotland Plc
Trustee	Banking Competition Remedies Limited
Funds	Capability and Innovation Fund Incentivised Switching Fund
Beneficiaries	Companies meeting the eligibility criteria as defined in the Trust Deed.
Main Terms	The trustee shall hold the amounts in relation to each respective fund on trust for such of the respective pools of beneficiaries in such amounts and such times as they shall determine taking into account the relevant fund rules and agreements.
Accountants	Saffery Champness LLP St Catherine's Court Berkeley Place Clifton Bristol BS8 1BQ

The above summary is intended as an aide-memoire and reference should be made to the Trust Deed before making decisions.

The Alternative Remedies Package Trust

Approval of the financial statements

In accordance with the engagement letter dated 22 January 2019, we approve the financial statements for the year set out on pages 38 to 44. We acknowledge our responsibility for the financial statements and for providing Saffery Champness LLP with all information and explanations necessary for their compilation.

B Peilow
On behalf of the Trustee

Date: 26 October 2020

The Alternative Remedies Package Trust

Report to the Trustee of The Alternative Remedies Package Trust

We have performed the procedures agreed with you upon the 5 April 2020 trust financial statements in accordance with our engagement letter dated 19 June 2019.

Our engagement was undertaken in accordance with the International Standard on Related Services 4400 (ISRS 4400) applicable to agreed-upon procedures engagements. The procedures were performed solely to verify that the completeness, existence, accuracy, ownership and valuation of the balances and transactions, as reported in the 5 April 2020 financial statements, are not materially misstated.

- 1) Substantive audit tests on a sample of accrued income for completeness, existence, accuracy, ownership and valuation;
- 2) Review bank reconciliations and vouch to bank statements for existence and accuracy;
- 3) Review of significant cash book journals in March and April for completeness of bank accounts;
- 4) Cut off testing of payments and expenses;
- 5) Review of post balance sheet invoices and payments to confirm completeness of accruals and other creditors;
- 6) Test of controls over payments;

We report our findings below:

We obtained sufficient reliable and relevant evidence to verify that that the completeness, existence, accuracy, ownership and valuation of the balances and transactions in the trust's financial statements are not materially misstated.

Because the above procedures do not constitute either an audit in accordance with International Standards on Auditing or International Standards on Review Engagements, we do not express an audit opinion on the 5 April 2020 trust financial statements.

Had we performed additional procedures or had we performed an audit or review of the financial statements in accordance with International Standards on Auditing or International Standards on Review Engagements, other matters might have come to our attention that would have been reported to you.

The Alternative Remedies Package Trust

Report to the Trustee of The Alternative Remedies Package Trust

Our report is solely for the purpose set forth in our engagement letter, is for your information and to the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Trustees, as a body, for this report, or for the opinions we have formed. This report relates only to the 5 April 2020 trust financial statements.

Saffery Champness LLP

26 October 2020

Chartered Accountants

St Catherine's Court
Berkeley Place
Clifton
Bristol
BS8 1BQ

The Alternative Remedies Package Trust

Balance sheet

As at 5 April 2020

	Note	2020 £	2019 £
Capital Fund			
Cash at bank and in hand	6	277,796,174	419,999,998
Debtors	7	527,563	-
Creditors	8	(502,452)	(1,265,061)
		<u>277,821,285</u>	<u>418,734,937</u>
Net capital assets		<u>277,821,285</u>	<u>418,734,937</u>
Represented by Capital account (page 40)		<u>277,821,285</u>	<u>418,734,937</u>
Income Fund			
Cash at bank and in hand	6	4,117,406	4,317,447
Debtors	7	3,586	89,799
Creditors	8	(218,122)	(1,983,017)
		<u>3,902,870</u>	<u>2,424,229</u>
Net income assets		<u>3,902,870</u>	<u>2,424,229</u>
Represented by Unallocated income account (page 41)		<u>3,902,870</u>	<u>2,424,229</u>

The Alternative Remedies Package Trust

Capital account
For the year ended 5 April 2020

	2020		Period from 25 April 2018 to 5 April 2019	
	£	£	£	£
Balance at 5 April 2019		418,734,937		-
Capital introduced		-	700,000,000	
Expenses				
General expenses		(13)		(3)
Inheritance tax				
Current year	(1,437,661)		(1,265,060)	
Over-provision for previous year	<u>225,904</u>		<u>-</u>	
		(1,211,757)		(1,265,060)
Capital distributions				
Capability and Innovation Fund				
Atom Bank PLC	10,000,000		-	
ClearBank Ltd	-		60,000,000	
Codat Limited	5,000,000		-	
The Co-operative Bank	15,000,000		-	
The Currency Cloud Group	10,000,000		-	
Fluidly Limited	5,000,000		-	
Form3 Ltd	5,000,000		-	
Funding Options Limited	5,000,000		-	
Investec Bank Plc	15,000,000		-	
Iwoca Ltd	10,000,000		-	
Metro Bank PLC	-		120,000,000	
Modulr Finance Ltd	10,000,000		-	
Nationwide Building Society	50,000,000		-	
Starling Bank Ltd	-		100,000,000	
Swoop Finance Limited	<u>5,000,000</u>		<u>-</u>	
		<u>(145,000,000)</u>		<u>(280,000,000)</u>
Balance carried forward		272,523,167		418,734,937

The Alternative Remedies Package Trust

Capital account

For the year ended 5 April 2020

	2020		Period from 25 April 2018 to 5 April 2019	
	£	£	£	£
Balance brought forward		272,523,167		418,734,937
Capability and Innovation Fund - Refunds				
Metro Bank PLC	(50,000,000)		-	
Nationwide Building Society	<u>(50,000,000)</u>		<u>-</u>	
		100,000,000		-
Incentivised Switching Fund				
Arbuthnot Latham & Co	211,615		-	
Clydesdale Bank PLC	24,767,803		-	
The Co-operative Bank	7,462,500		-	
Habib Bank Zurich plc	10,092		-	
Hampden & Co	50,375		-	
Svenska Handelsbanken	4,024,676		-	
Metro Bank PLC	7,924,611		-	
Santander UK plc	35,098,585		-	
Starling Bank Ltd	8,178,250		-	
TSB Bank plc	<u>6,973,375</u>		<u>-</u>	
		<u>(94,701,882)</u>		<u>-</u>
Balance at 5 April 2020 (page 38)		<u><u>277,821,285</u></u>		<u><u>418,734,937</u></u>

The Alternative Remedies Package Trust

Accumulated income account
For the year ended 5 April 2020

	2020 £	Period from 25 April 2018 to 5 April 2019 £
Balance as at 5 April 2019	2,424,229	-
Net income for the period (page 42)	<u>1,478,641</u>	<u>2,424,229</u>
Balance at 5 April 2020 (page 38)	<u>3,902,870</u>	<u>2,424,229</u>

The Alternative Remedies Package Trust

Income and expenditure account
For the year ended 5 April 2020

	2020 £	Period from 25 April 2018 to 5 April 2019 £
Interest		
Bank of England interest	2,689,426	4,407,290
Expenses		
Bank charges	(1,154)	(44)
Taxation		
Income tax	<u>(1,209,631)</u>	<u>(1,983,017)</u>
Net income for the period (page 41)	<u>1,478,641</u>	<u>2,424,229</u>

The Alternative Remedies Package Trust

Notes to the financial statements

For the year ended 5 April 2020

1 Accounting policies

These financial statements have been prepared on an accruals basis, and incorporate provisions for all known current liabilities. Contingent gains or losses are not recognised or accrued.

Investment income is shown gross of tax, except where otherwise stated.

2 Going concern

It is anticipated that the Trust will have insufficient funds to meet all of its tax liabilities which will become due in the twelve months beyond the balance sheet date - the estimated shortfall of circa £2.6m will be met by a transfer from the Trustee, Banking Competition Remedies Ltd.

3 Income tax

A provision has been made in the financial statements for all income tax payable by the Trustee.

4 Capital gains tax

No sales of investments were made during the year and therefore there is no capital gains tax payable.

5 Inheritance tax

A provision has been made in the financial statements for the inheritance tax payable by the Trustee in respect of the capital distributions made during the period.

6	Cash at bank and in hand	Income £	Capital £	2020 Total £	2019 Total £
	Bank of England (50005588)		280,562,269	280,562,269	419,999,998
	Bank of England (50005618)	<u>4,117,406</u>	<u>(2,766,095)</u>	<u>1,351,311</u>	<u>4,317,447</u>
		<u>4,117,406</u>	<u>277,796,174</u>	<u>281,913,580</u>	<u>424,317,445</u>
7	Debtors	Income £	Capital £	2020 Total £	2019 Total £
	Bank of England interest	3,586	-	3,586	89,799
	Inheritance tax	<u>-</u>	<u>527,563</u>	<u>527,563</u>	<u>-</u>
		<u>3,586</u>	<u>527,563</u>	<u>531,149</u>	<u>89,799</u>

The Alternative Remedies Package Trust

Notes to the financial statements
For the year ended 5 April 2020

8	Creditors	Income £	Capital £	2020 Total £	2019 Total £
	Due to Settlor	-	1	1	1
	Inheritance tax	-	502,451	502,451	1,265,060
	Income tax	<u>218,122</u>	<u>-</u>	<u>218,122</u>	<u>1,983,017</u>
		<u>218,122</u>	<u>502,452</u>	<u>720,574</u>	<u>3,248,078</u>