



HM Revenue
& Customs

The Code of Practice on Taxation for Banks

Annual Report 2018

Publication date: 17 December 2018

Contents

1	Introduction
2	Operation of the Code to 31 March 2018
3	Forward look
Annex A	The Code of Practice on Taxation for Banks
Annex B	List of banks which had adopted Code at 31 March 2018
Annex C	List of banks which had not adopted Code at 31 March 2018

On request this document can be produced in Welsh and alternate formats including large print, audio and Braille formats

1. Introduction

- 1.1. The Code of Practice on Taxation for Banks (“the Code”) helps to deliver the government’s objective of promoting compliance and preventing non-compliance. It was introduced in 2009 to change the attitudes and behaviours of banks towards avoidance because of their unique position as potential users, promoters and funders of tax avoidance.
- 1.2. The Code (reproduced in Annex A) describes the approach expected of banks with regard to governance, tax planning and engagement with HMRC. Banks operating in the UK that sign up to the Code commit to adopt best practice in relation to their own tax affairs, and not to promote tax avoidance by others. The Code sets out that banks should:
- adopt adequate governance to control the types of transactions they enter into
 - not undertake tax planning that aims to achieve a tax result that is contrary to the intentions of Parliament
 - comply fully with all their tax obligations; and
 - maintain a transparent relationship with HM Revenue and Customs (HMRC).
- 1.3. To strengthen the Code and provide greater transparency, legislation was introduced in Finance Act 2014, which requires HMRC to publish an annual report on how the Code is operating. The annual report lists all banks that have, and all banks that have not, adopted the Code. Where HMRC has concerns over whether a bank has met its obligations under the Code, we will take action to address these concerns in line with the published Governance Protocol¹ (“the Protocol”). As part of this, we may name in the annual report any bank that we consider has not complied with its Code commitments.
- 1.4. A fuller history of the Code was set out in the introduction to the first annual report, which covered the period 5 December 2013 to 31 March 2015, available on the gov.uk website.²

¹<https://www.gov.uk/government/publications/code-of-practice-on-taxation-for-banks-governance-protocol>

² <https://www.gov.uk/government/collections/the-code-of-practice-on-taxation-for-banks>

2. Operation of the Code in the year ended March 2018

Overview

- 2.1. This is the fourth annual report on the operation of the Code, covering the period 1 April 2017 to 31 March 2018.
- 2.2. The names of the 315 banks that had adopted the Code as at 31 March 2018 are listed at Annex B. The list includes:
 - 307³ banks that had adopted the Code at 31 March 2017;
 - 8 banks which adopted in the year ended 31 March 2018.
- 2.3. Seven groups or entities who were listed as adopters at 31 March 2017 are not in the Code population⁴ at 31 March 2018, either because they ceased trading or because they became part of another banking group. Their names remain on the list but have been struck through and will not be included in later lists.
- 2.4. The 11 banks within the Code population that had not adopted the Code as at 31 March 2018 are listed at Annex C. Nine of these banks have now adopted the Code. This list is drawn from banks which HMRC's records show to be within the charge to the bank levy (whether or not they have any liability for the period), and from the list of banks and building societies published by the Prudential Regulatory Authority.
- 2.5. The Code continues to support improved behaviour across the banking sector.
 - None of the banks which had adopted the Code by 31 March 2018 have been determined to be in breach of the Code during the period covered by this report.
 - Banks that had adopted the Code did not make any disclosures under the Disclosure of Tax Avoidance Scheme regime in the period of the report.
 - HMRC's Customer Compliance Managers (CCMs) continue to report that banks which previously engaged in avoidance activity prior to adopting the Code are no longer doing so and now have governance and behaviours which are Code compliant.

³ The total number of adopters at 31 March 2017 was 314. There was a numbering error so the list only included 313 entries but Habib Bank Zurich should have been included as a separate entry. Seven banks on the 2017 list are no longer adopters (see 2.3) leaving the 306 banks included on the 2018 list.

⁴ As defined in Section 285(4)-(6), Finance Act 2014

2.6. Where HMRC has concerns, it addresses them in line with the Protocol.

- Where concerns relate to governance or the bank's relationship with HMRC, the CCM will raise the concerns with the bank after getting approval from the Senior Civil Servant (SCS) grade officers in Large Business (LB) and Business, Assets & International (BAI) directorate who lead the Code team. HMRC expects the bank to make the changes needed to bring its tax governance and/or its relationship with HMRC in line with the commitments it has made under the Code.
- If the bank does not address the CCM's concerns satisfactorily, the CCM and Code team will report the issue to HMRC directors who will seek a meeting with the bank at a senior level.
- Where the concerns relate to tax planning and the bank has notified the transaction to HMRC before it takes place, HMRC expects the bank to enter into collaborative discussions to ensure the bank does not enter into any transaction that would give a tax result that would be contrary to the intentions of Parliament. In such cases, the issue will not normally require any further action.
- Where HMRC is concerned that a transaction could include such avoidance and the bank does not approach HMRC before it takes place, in addition to any investigation of the issue under HMRC's usual compliance powers, the CCM will raise the question of Code compliance with the bank. If, despite the bank's explanations, the CCM still has concerns that the transaction may have been contrary to the Code, he/she will conduct a comprehensive review of the bank's compliance with the Code including its governance. If the CCM and Code team are concerned that there may be weaknesses in the bank's governance that have not been rectified, they will escalate the issue by referral to HMRC directors. If there are no ongoing concerns about governance, the Code team will consider with the CCM whether any other aspects of the bank's conduct warrant escalation of the transaction.
- On escalation, HMRC Directors will seek a meeting with the bank at a senior level.
- If HMRC's concerns remain unresolved following discussions between its Directors and the bank's board, and after the bank has had the opportunity to make further representations, the concern will be escalated further in line with the Protocol and could result in the bank being named in a future report. This applies equally to concerns over governance, tax planning and the bank's relationship with HMRC.
- The final decision on whether a bank will be named in a future annual report is made by the HMRC Commissioners. Before making this decision, the Commissioners must commission a report from an independent reviewer.

- 2.7. Where there is an ongoing criminal investigation relating to a tax matter, (for example where a bank is under criminal investigation for a failure to prevent the facilitation of tax evasion) HMRC will normally postpone any consideration of whether a bank has breached the Code until the criminal proceedings conclude. This is to prevent the investigation and proceedings from being prejudiced. Any Code concerns that remain will be addressed once the outcome of the proceedings is known.
- 2.8. In 2017/18, CCMs continued to discuss initial concerns raised in 2016/17 over a bank's Code compliance with a small number of banks. In almost every case the concerns were addressed without the need for escalation. Where the concerns related to tax planning and the bank had notified a proposed transaction to HMRC before it took place, the bank agreed not to enter into the transaction. Interventions completed in the reporting year prevented tax losses of around £170m. No new initial concerns were raised in 2017/18.

HMRC's Compliance work with banks

- 2.9. The commitments banks have given under the Code require them to bring promptly to HMRC's attention all material facts relevant to their own tax affairs and in relation to the tax consequences of products and services they promote to their customers. They require the banks to maintain good internal controls over their tax affairs and to have clear lines of accountability within the bank for the implementation of its tax strategy. In addition to ensuring that specific transactions are not designed to achieve tax results that are contrary to the intentions of Parliament, the Code also requires banks to have strong governance around tax and for HMRC and the banks to work together to encourage mutually open and transparent relationships.
- 2.10. In common with HMRC's overall compliance strategy, HMRC's Large Business directorate (LB) manages the tax compliance of the 70 largest banks. HMRC's Wealthy & Mid-Sized Business Compliance directorate (WMBC) manages the tax compliance of smaller banks.
- 2.11. LB carries out a Business Risk Review (BRR) annually for all non-low-risk large businesses. Where the business is low risk the CCM will not usually carry out another formal BRR for two to three years. The BRR enables HMRC's CCMs to establish a good understanding of the tax risk profile in a particular business.
- 2.12. Forty five of the seventy banks dealt with in Large Business had a BRR during the 2017/18 reporting period. All of these BRRs included a discussion between the bank and CCM regarding the Code and the majority carried out a review of the bank's governance process during 2017/18. In most cases the CCM discussed the Code with the bank on at least one other occasion.

2.13. As part of the BRR process, the CCM will review information from a range of sources, including information HMRC already holds in respect of a business and information in the public domain. Specifically for banks this includes, for example, asking a bank to explain why it believes a transaction identified as part of the risk assessment process was Code-compliant. Another way of gathering relevant information is through a review of the bank's Code governance process by HMRC governance and audit specialists. CCMs will use this information to help determine if the bank is complying with its Code commitments. CCMs and banks will be expected to work together to address any gaps in knowledge before the next BRR.

2.14. In 2016-17, HMRC introduced a new BRR template specifically tailored for banking businesses to ensure Code compliance is a central part of this process. A further change has since been made in 2017/18, providing CCMs with an additional category when assessing a bank's compliance with the Code. This will be used where the CCM does not have sufficient information to determine whether the bank is fully compliant with its Code commitments.

2.15. The four categories on the BRR template are now:

- the bank's compliance with the Code is under review;
- the bank is compliant with its Code commitments;
- there are initial concerns over the bank's compliance with its Code commitments⁵; and
- there is an interim view that the bank has breached the Code⁶

2.16. HMRC carried out a consultation on the BRR process in 2017/18. As a result of this consultation, an enhanced BRR will be piloted during 2018/19 with a view to full implementation during 2019/20 if the pilot proves to be successful. The consultation provided several suggestions for how the BRR could be improved, most notably the BRR should:

- classify customers across an increased number of risk categories;
- take more account of the tax risk management work already required by large businesses;
- prompt continuous dialogue between CCMs and their customer on reducing tax risks;

⁵ A bank will only be included in this category where SCS grade staff in LB and BAI have given approval to discuss the concerns with the bank.

⁶ A bank will only be included in this category when the case has been considered by the Tax Disputes Resolution Board and the Board have concluded that the bank has breached the Code.

- clearly set out the advantages and disadvantages of being classified in a certain risk category.

The Code will continue to be an important part of the BRR process for banks.

2.17. As a further reminder of the importance of the Code, a temperature check was held mid-year to evaluate how customers were operating the Code and to check when CCMs had most recently considered a Code matter. This confirmed that the majority of banks were complying with their Code commitments.

2.18. The tax compliance of smaller banks is managed by a specialist team within WMBC. These banks do not have a dedicated CCM.

- During formal enquiries HMRC emphasises the Code obligation to 'maintain a transparent relationship' with HMRC in order to resolve matters quickly and efficiently.
- Outside the formal enquiry process HMRC raises Code compliance when meeting the representatives of smaller banks, in order to ensure they are aware of and meet their obligations under the Code.
- All of the banks that the team have interacted with during the year have had an open and transparent relationship with HMRC. Where necessary, the team has reminded customers of their obligations under the code to encourage collaborative working to achieve early resolution. No small bank has raised a Code issue with HMRC.

2.19. Throughout the reporting period, a number of events were held to enhance staff understanding of how to review a bank's compliance with the Code, both during their ongoing relationship with the bank and as part of the BRR process. These included formal training events and in-depth workshops where staff considered the application of the Code to real-world scenarios. Updates and refresher training were also provided at sector meetings. These were supplemented by communications from senior members of the Code team.

2.20. Tailored training was provided for the specialist team within WMBC during 2017/18. This covered the operation of the Code and how to identify if smaller banks are complying with their commitments under the Code, as well as informing them of the escalation process should any concerns arise.

2.21. HMRC has continued to work closely with other government agencies as part of the cross government Panama Papers Taskforce. One key strand of that work has been reviewing the extent of UK financial intermediaries' links to the arrangements under investigation. Progress has been made to narrow the focus and work continues to review evidence relating to banks' links to Panama and other offshore jurisdictions to assess whether such links are consistent with commitments under the Code.

HMRC's response to Code approaches

- 2.22. Where a bank is unsure whether or not the tax result of a proposed transaction is contrary to the intentions of Parliament, it may discuss those plans in advance with HMRC (as set out in paragraph of 4.2 of the Code). In the period covered by this report, banks made nine pre-transaction Code approaches compared with nineteen in the previous reporting period. In three cases, the bank and HMRC agreed that this was not a transaction where it was necessary to consider the intentions of Parliament under paragraph 3.2 of the Code. In two of the three cases this was because the tax planning did not result in a change to the UK tax position. In the third, the bank decided not to proceed with the transaction before a decision had been reached. The six remaining cases were agreed to be Code-compliant.
- 2.23. In the 2016/17 report, HMRC made a commitment to engage with representative bodies to understand if banks were concerned by the increase in turnaround time for Code approaches from 10 days in 2015/16 to 20 days in 2016/17. Representative bodies wanted HMRC to make a commitment in guidance to deal with Code approaches within a certain period of time. As a result, HMRC will include a commitment in the Code guidance to respond to Code approaches within 28 days. Where there is a commercial imperative to agree the Code position more quickly than this, HMRC will endeavour to meet this requirement. Where the complexity of the issues raised means that more time may be needed, HMRC will indicate to the bank at the outset that a decision is likely to take longer. If HMRC needs to ask for more information, the time taken by the bank to provide that information is excluded from the response time.
- 2.24. Future reports will indicate whether HMRC met the 28 day turnaround time.
- 2.25. During the 2017/18 reporting period, four of the six Code approaches considered were dealt with in less than 28 days.

3. Forward Look

Role and operation of the Code

- 3.1. HMRC will continue to carry out frequent training to enhance our staff's understanding of how to review a bank's compliance with the Code and will ensure all new staff joining both LB and WMBC banking teams are trained on the Code.
- 3.2. HMRC will produce clear guidance for case teams setting out their responsibilities in relation to the operation of the Code.

Work with representative bodies

- 3.3. HMRC will work with representative bodies to identify the areas of the Code guidance which might benefit from revision, sharing the draft revised guidance with them prior to publication. We aim to publish draft guidance for comment by 31 March 2019.

Next Annual Report

The next annual report will cover the period 1 April 2018 to 31 March 2019 and will be published by 31 December 2019.

Annex A: The Code of Practice on Taxation for Banks

OVERVIEW

1. The Government expects that banking groups, their subsidiaries, and their branches operating in the UK, will comply with the spirit, as well as the letter, of tax law, discerning and following the intentions of Parliament.

1.1 This means that banks should:

- adopt adequate governance to control the types of transactions they enter into
- not undertake tax planning that aims to achieve a tax result that is contrary to the intentions of Parliament
- comply fully with all their tax obligations
- maintain a transparent relationship with HM Revenue & Customs (HMRC).

GOVERNANCE

2. The bank should have a documented strategy and governance process for taxation matters encompassed within a formal policy. Accountability for this policy should rest with the UK board of directors or, for foreign banks, a senior accountable person in the UK.

2.1. This policy should include a commitment to comply with tax obligations and to maintain an open, professional, and transparent relationship with HMRC.

2.2. Appropriate processes should be maintained, by use of product approval committees or other means, to ensure the tax policy is taken into account in business decision-making. The bank's tax department should play a critical role and its opinion should not be ignored by business units. There may be a documented appeals process to senior management for occasions when the tax department and business unit disagree.

TAX PLANNING

3. The bank should not engage in tax planning other than that which supports genuine commercial activity.

3.1. Transactions should not be structured in a way that will have tax results for the bank that are inconsistent with the underlying economic consequences unless there exists specific legislation designed to give that result. In that case, the bank should reasonably believe that the transaction is structured in a way that gives a tax result for the bank which is not contrary to the intentions of Parliament

3.2 There should be no promotion of arrangements to other parties unless the bank reasonably believes that the tax result of those arrangements for the other parties is not contrary to the intentions of Parliament.

3.3 Remuneration packages for bank employees, including senior executives, should be structured so that the bank reasonably believes that the proper amounts of tax and national insurance contributions are paid on the rewards of employment.

RELATIONSHIP BETWEEN THE BANK AND HMRC

4. Relationships with HMRC should be transparent and constructive, based on mutual trust wherever possible.

4.1. The features of this relationship should include:

- disclosing fully the significant uncertainties in relation to tax matters
- focusing on significant issues
- seeking to resolve issues before returns are filed whenever practicable
- engaging in a co-operative, supportive and professional manner in all interactions
- working collaboratively to achieve early resolution and hence certainty.

4.2. Where the bank is in doubt whether the tax result of a proposed transaction is contrary to the intentions of Parliament, to help the bank form its reasonable belief under section 3, it may discuss its plans in advance with HMRC.

Annex B: List of banks which had adopted Code at 31 March 2018

Banks, Building Societies and Other Financial Institutions "Banks" Adopting or Readopting The Code of Practice on Taxation for Banks at 31 March 2018

This list includes all banks that have unconditionally adopted or readopted the Code. Adoption will cover all a group's operations in the UK and, in the majority of cases, only an agreed principal name for the overall adopting group is shown.

Where requested HMRC has agreed to include names in addition to the principal group name if:

- The names on the Prudential Regulation Authority lists are so different that it would not be obvious that they are connected and covered by the same adoption, or
- A group operating in the UK does so through separately named and independently managed entities and their names are so different that it would not be obvious that they are connected.

	Principal Name	Adoption Includes
1	Aareal Bank AG	
2	ABC International Bank plc	
3	ABN AMRO UK Group	
4	Access Bank UK Ltd, The	
5	ADIB (UK) Limited	
6	Agricultural Bank of China (UK) Limited	
7	Ahli United Bank plc	
8	Airdrie Savings Bank⁷	
9	Al Rayan Bank	
10	Aldermore Bank plc	
11	Alliance Trust plc	
12	Allied Irish Banks plc Group	AIB Group (UK) plc
13	Allfunds Bank S.A.	
14	Alpha Bank AE	Alpha Bank AE London branch and Alpha Bank London Ltd
15	ANZ Banking Group Limited	
16	Arab National Bank	
17	Arbuthnot Banking Group plc	
18	Atom Bank plc	
19	Axis Bank UK Limited	
20	B B Securities Limited	
21	Banca IMI SpA London branch	
22	Banca March (Spain) - London Branch	
23	Banca Monte dei Paschi di Siena SpA - London Branch	
24	Banco Bilbao Vizcaya Argentaria S.A London Branch	
25	Banco Bradesco Europe SA	
26	Banco de Sabadell SA - London Branch	
27	Banco do Brasil SA - London Branch	
28	Bangkok Bank Public Co Limited	
29	Bank Frick & Co AG	
30	Bank Hapoalim BM	

⁷ Airdrie Savings Bank ceased trading before 31 March 2018.

Banks, Building Societies and Other Financial Institutions "Banks" Adopting or Readopting The Code of Practice on Taxation for Banks at 31 March 2018

This list includes all banks that have unconditionally adopted or readopted the Code. Adoption will cover all a group's operations in the UK and, in the majority of cases, only an agreed principal name for the overall adopting group is shown.

Where requested HMRC has agreed to include names in addition to the principal group name if:

- The names on the Prudential Regulation Authority lists are so different that it would not be obvious that they are connected and covered by the same adoption, or
- A group operating in the UK does so through separately named and independently managed entities and their names are so different that it would not be obvious that they are connected.

	Principal Name	Adoption Includes
31	Bank J. Safra Sarasin (Gibraltar) Ltd	
32	Bank Leumi (UK) plc	
33	Bank Vontobel Europe AG	
34	Bank of America Group	
35	Bank of Baroda	
36	Bank of Beirut (UK) Limited	
37	Bank of Ceylon (UK) Ltd	
38	Bank of China	
39	Bank of Communications Co Ltd London Branch	
40	Bank of Communications (UK) Limited	
41	Bank of Cyprus UK Limited	
42	Bank of East Asia Limited	
43	Bank of India	
44	Bank of Ireland	
45	Bank of London and The Middle East plc	
46	Bank of Montreal	
47	Bank of New York Mellon (UK Group)	
48	Bank of Nova Scotia, The	
49	Bank of the Philippine Islands (Europe) plc	
50	Bank of Taiwan - London Branch	
51	Bank Saderat plc	
52	Bank Sepah International plc	
53	Banque Chaabi du Maroc	
54	Banque Havilland SA	
55	Bank Mandiri (Europe) Ltd	
56	Banque Transatlantique	
57	Barclays Bank	
58	Bath Investment & Building Society	
59	BAWAG PSK International	
60	Bayerische Landesbank - London Branch	
61	Beverley Building Society	
62	BIRA Bank Limited	
63	BLOM Bank France – London Branch	
64	BMCE Bank International plc	

Banks, Building Societies and Other Financial Institutions "Banks" Adopting or Readopting The Code of Practice on Taxation for Banks at 31 March 2018

This list includes all banks that have unconditionally adopted or readopted the Code. Adoption will cover all a group's operations in the UK and, in the majority of cases, only an agreed principal name for the overall adopting group is shown.

Where requested HMRC has agreed to include names in addition to the principal group name if:

- The names on the Prudential Regulation Authority lists are so different that it would not be obvious that they are connected and covered by the same adoption, or
- A group operating in the UK does so through separately named and independently managed entities and their names are so different that it would not be obvious that they are connected.

	Principal Name	Adoption Includes
65	BNP Paribas	
66	British Arab Commercial Bank plc	
67	Brown Shipley	
68	Buckinghamshire Building Society	
69	Byblos Bank Europe SA	
70	C Hoare & Co	
71	CAF Bank	
72	Caixabank SA	
73	Caixa Geral De Depositos SA - London Branch	
74	Cambridge & Counties Bank Limited	
75	Cambridge Building Society	
76	Canadian Imperial Bank of Commerce	
77	Canara Bank	
78	Carnegie Investment Bank AB	
79	Cattles Limited	
80	Cecabank SA	
81	Chang Hwa Commercial Bank Ltd - London Branch	
82	Charity Bank Limited, The	
83	Charter Savings Bank	
84	Chetwood Financial Ltd ⁸	
85	Chiba Bank Ltd - London Branch, The	
86	China Construction Bank (London) Ltd	China Construction Bank Corporation London Branch
87	China Merchants Bank Co Ltd	
88	Chorley & District Building Society	
89	CIMB Bank Berhad - London Branch	
90	Citadel Securities (Europe) Ltd	
91	Citi	
92	ClearBank Limited ⁹	
93	Clearstream Banking S.A.	
94	Close Brothers Group plc	
95	Commerzbank AG	

⁸ Chetwood Financial Ltd adopted the Code in the period this report covers.

⁹ ClearBank Limited adopted the Code in the period this report covers.

Banks, Building Societies and Other Financial Institutions "Banks" Adopting or Readopting The Code of Practice on Taxation for Banks at 31 March 2018

This list includes all banks that have unconditionally adopted or readopted the Code. Adoption will cover all a group's operations in the UK and, in the majority of cases, only an agreed principal name for the overall adopting group is shown.

Where requested HMRC has agreed to include names in addition to the principal group name if:

- The names on the Prudential Regulation Authority lists are so different that it would not be obvious that they are connected and covered by the same adoption, or
- A group operating in the UK does so through separately named and independently managed entities and their names are so different that it would not be obvious that they are connected.

	Principal Name	Adoption Includes
96	Commonwealth Bank of Australia, The	
97	Co-operative Bank plc, The	
98	Coventry Building Society	
99	Crédit Agricole Group	
100	Crédit Industriel et Commercial Group	Crédit Industriel et Commercial and Banque Transatlantique SA London Branch
101	Credit Suisse	
102	Crown Agents Bank Limited	
103	CYBG PLC	Clydesdale Bank PLC, Yorkshire Bank ¹⁰
104	Cumberland Building Society	
105	Daiwa Capital Markets Europe Limited	Daiwa Corporate Advisory Limited, Daiwa Corporate Advisory Holdings Limited and Daiwa Asset Management (Europe) Ltd
106	Danske Bank A/S	Northern Bank Ltd
107	Darlington Building Society	
108	DBS Bank Limited	
109	DEPFA Bank ¹¹	DEPFA Bank plc and Hypo Public Finance Bank
110	Deutsche Bank AG	
111	Deutsche Pfandbriefbank AG	
112	Diamond Bank (UK) plc	
113	DNB Bank ASA	
114	Dudley Building Society	
115	Duncan Lawrie Limited ¹²	
116	DVB Bank SE	
117	DZ Bank	
118	Earl Shilton Building Society	
119	Ecology Building Society	
120	EFG Eurobank Ergasias SA – London Branch¹³	
121	EFG Private Bank Limited	
122	Elavon Financial Services Designated Activity Company	

¹⁰ Yorkshire Bank is a trading name of Clydesdale Bank PLC.

¹¹ DEPFA Bank ceased trading before 31 March 2018.

¹² Duncan Lawrie Limited ceased trading before 31 March 2018.

¹³ EFG Eurobank Ergasias SA – London Branch ceased trading before 31 March 2018.

Banks, Building Societies and Other Financial Institutions "Banks" Adopting or Readopting The Code of Practice on Taxation for Banks at 31 March 2018

This list includes all banks that have unconditionally adopted or readopted the Code. Adoption will cover all a group's operations in the UK and, in the majority of cases, only an agreed principal name for the overall adopting group is shown.

Where requested HMRC has agreed to include names in addition to the principal group name if:

- The names on the Prudential Regulation Authority lists are so different that it would not be obvious that they are connected and covered by the same adoption, or
- A group operating in the UK does so through separately named and independently managed entities and their names are so different that it would not be obvious that they are connected.

	Principal Name	Adoption Includes
123	Emirates NBD Bank (P.J.S.C) ¹⁴	
124	Erste Group Bank AG - London Branch	
125	Eurobank Private Bank Luxembourg S.A. London Branch	
126	Europe Arab Bank plc	
127	Export-Import Bank of India	
128	FCMB Bank (UK) Limited	
129	FBN Bank (UK) Limited	
130	FCE Bank plc	
131	First Abu Dhabi Bank P.J.S.C ¹⁵	
132	First Commercial Bank - London Branch	
133	FirstRand	
134	Furness Building Society	
135	Gatehouse Bank plc	
136	GE Capital Bank Limited¹⁶	
137	GE Corporate Finance Bank SAS (UK Branch)¹⁷	
138	Ghana International Bank plc	
139	Goldman Sachs	
140	Guaranty Trust Bank (UK) Limited	
141	Gulf International Bank BSC (London Branch) ¹⁸	
142	Gulf International Bank (UK) Limited	
143	Habib Bank Zurich plc ¹⁹	
144	Haitong Bank, S.A	
145	Hampden & Co plc	
146	Hampshire Trust Bank plc	
147	Hanley Economic Building Society	
148	Harpden Building Society	
149	Havin Bank Limited	
150	HBL UK Banking Group	Habib Allied Holding Limited, Habibsons Bank Ltd

¹⁴ Name change from Emirates NBD PJSC to Emirates NBD Bank (P.J.S.C).

¹⁵ Name change from National Bank of Abu Dhabi to First Abu Dhabi Bank P.J.S.C

¹⁶ GE Capital Bank Limited ceased trading before 31 March 2018.

¹⁷ GE Corporate Finance Bank SAS (UK Branch) ceased trading before 31 March 2018.

¹⁸ Gulf International Bank BSC (London Branch) adopted the Code in the period this report covers.

¹⁹ Habib Bank Zurich plc, a 100% owned subsidiary of Habib Bank AG Zurich, was previously included with HBL UK Banking Group in error.

Banks, Building Societies and Other Financial Institutions "Banks" Adopting or Readopting The Code of Practice on Taxation for Banks at 31 March 2018

This list includes all banks that have unconditionally adopted or readopted the Code. Adoption will cover all a group's operations in the UK and, in the majority of cases, only an agreed principal name for the overall adopting group is shown.

Where requested HMRC has agreed to include names in addition to the principal group name if:

- The names on the Prudential Regulation Authority lists are so different that it would not be obvious that they are connected and covered by the same adoption, or
- A group operating in the UK does so through separately named and independently managed entities and their names are so different that it would not be obvious that they are connected.

	Principal Name	Adoption Includes
151	Hinckley & Rugby Building Society	
152	Holmesdale Building Society	
153	HSBC Holdings plc	
154	Hua Nan Commercial Bank Ltd - London Branch	
155	ICBC Ltd London Branch	
156	ICBC (London) Plc	
157	ICBC Standard Bank plc	
158	ICICI Bank UK Limited	
159	Ikano Bank AB	
160	IKB Deutsche Industriebank AG London Branch	
161	Industrial and Commercial Bank of China Ltd ICBC	
162	Industrial Bank of Korea - London Branch	
163	ING	
164	Intesa Sanpaolo S.p.A. - London Branch	
165	Intesa Sanpaolo Private Banking S.p.A	
166	Investec plc	
167	Ipswich Building Society	
168	Itau BBA International plc	
169	Jefferies International Limited	
170	Joh. Berenberg, Gossler & Co. KG	
171	John Deere Bank S.A.	
172	Jordan International Bank plc	
173	JP Morgan	
174	Julian Hodge Bank Limited	
175	KAS Bank NV	
176	KBC UK Banking Group	KBC Financial Products Ltd, KBC Bank NV - London Branch and KBC Investments Ltd
177	KEB Hana Bank	
178	Kexim Bank (UK) Limited	
179	KfW IPEX-Bank GmbH - London Branch	
180	Kingdom Bank Limited	
181	Kleinwort Benson ²⁰	
182	Kookmin Bank International Limited	
183	Korea Development Bank - London Branch, The	
184	Landesbank Baden-Württemberg	
185	Landesbank Hessen-Thüringen Girozentrale (London Branch)	

²⁰ Kleinwort Benson are now included with Societe Generale

Banks, Building Societies and Other Financial Institutions "Banks" Adopting or Readopting The Code of Practice on Taxation for Banks at 31 March 2018

This list includes all banks that have unconditionally adopted or readopted the Code. Adoption will cover all a group's operations in the UK and, in the majority of cases, only an agreed principal name for the overall adopting group is shown.

Where requested HMRC has agreed to include names in addition to the principal group name if:

- The names on the Prudential Regulation Authority lists are so different that it would not be obvious that they are connected and covered by the same adoption, or
- A group operating in the UK does so through separately named and independently managed entities and their names are so different that it would not be obvious that they are connected.

	Principal Name	Adoption Includes
186	Leeds Building Society	
187	Leek United Building Society	
188	Lenlyn Holdings plc	R Raphael and Sons plc
189	Lloyds Banking Group plc	Lloyds Bank plc and Bank of Scotland plc (including Halifax)
190	Lombard Odier (Europe) SA	
191	Loughborough Building Society	
192	Macquarie Group	
193	MainFirst Bank AG	
194	Masthaven Ltd ²¹	
195	Malayan Banking Berhad	
196	Manchester Building Society	
197	Mansfield Building Society	
198	Market Harborough Building Society	
199	Marsden Building Society	
200	Mashreq Bank Psc - London branch	
201	Mediobanca- Banca di Credito - London branch	
202	Mega International Commercial Bank - London Branch	
203	Melli Bank plc	
204	Melton Mowbray Building Society	
205	Methodist Chapel Aid Limited	
206	Metro Bank plc	
207	Mirabaud and Cie (Europe) SA UK Branch ²²	
208	Mitsubishi UFJ Financial Group	Mitsubishi UFJ Securities International plc, The MUFG Bank Ltd. ²³ , Mitsubishi UFJ Trust & Banking Corporation - London Branch, Mitsubishi UFJ Trust International Limited and Mitsubishi UFJ Asset Management (UK) Ltd
209	Mizrahi Tefahot Bank Limited	
210	Mizuho UK Banking Group	Mizuho International plc, Mizuho Bank - London Branch and Mizuho Capital Markets (UK) Ltd

²¹ Masthaven Ltd adopted the Code in the period this report covers.

²² Mirabaud and Cie (Europe) SA UK Branch adopted the Code in the period this report covers.

²³ Name change from The Bank of Tokyo-Mitsubishi UFJ, Ltd to MUFG Bank, Ltd after the end of the reporting period.

Banks, Building Societies and Other Financial Institutions "Banks" Adopting or Readopting The Code of Practice on Taxation for Banks at 31 March 2018

This list includes all banks that have unconditionally adopted or readopted the Code. Adoption will cover all a group's operations in the UK and, in the majority of cases, only an agreed principal name for the overall adopting group is shown.

Where requested HMRC has agreed to include names in addition to the principal group name if:

- The names on the Prudential Regulation Authority lists are so different that it would not be obvious that they are connected and covered by the same adoption, or
- A group operating in the UK does so through separately named and independently managed entities and their names are so different that it would not be obvious that they are connected.

	Principal Name	Adoption Includes
211	Monmouthshire Building Society	
212	Monzo Bank Ltd ²⁴	
213	Morgan Stanley	
214	Nacional Financiera SNC - London Branch	
215	National Australia Bank Limited	
216	National Bank Financial Inc UK Branch	
217	National Bank Of Canada - London Branch	
218	National Bank of Egypt (UK) Limited	
219	National Bank of Greece UK	National Bank of Greece SA London Branch, NBGI Private Equity Ltd, NBG International Ltd, NBG GP Ltd, NBG Finance plc, NBG Finance (Dollar) plc and NBG Finance (Sterling) plc
220	National Bank of Kuwait (International) plc	
221	National Counties Building Society	
222	Nationwide Building Society	
223	Natixis	
224	Nedbank	
225	Newbury Building Society	
226	Newcastle Building Society	
227	NIBC Bank NV	
228	Noble Grossart Holdings Limited	
229	Nomura UK Group	
230	NORD/LB Group	NORD/LB Norddeutsche Landesbank Girozentrale and Deutsche Hypothekenbank Aktiengesellschaft
231	Nordea Bank AB	
232	Norinchukin Bank - London Branch, The	
233	North Lanarkshire Municipal Bank Limited	
234	Northern Trust Company, The	
235	Nottingham Building Society	
236	Novo Banco SA	
237	OakNorth Bank	

²⁴ Monzo Bank Ltd adopted the Code in the period this report covers.

Banks, Building Societies and Other Financial Institutions "Banks" Adopting or Readopting The Code of Practice on Taxation for Banks at 31 March 2018

This list includes all banks that have unconditionally adopted or readopted the Code. Adoption will cover all a group's operations in the UK and, in the majority of cases, only an agreed principal name for the overall adopting group is shown.

Where requested HMRC has agreed to include names in addition to the principal group name if:

- The names on the Prudential Regulation Authority lists are so different that it would not be obvious that they are connected and covered by the same adoption, or
- A group operating in the UK does so through separately named and independently managed entities and their names are so different that it would not be obvious that they are connected.

	Principal Name	Adoption Includes
238	OneSavings Bank plc	
239	Oversea-Chinese Banking Corporation - London Branch	
240	Paragon Group PLC	
241	PCF Bank Limited ²⁵	
242	Penrith Building Society	
243	Persia International Bank	
244	Philippine National Bank (Europe) plc	
245	Pictet & Cie (Europe) S.A., London Branch	
246	Piraeus Bank SA - London Branch	
247	Portigon	
248	Principality Building Society	
249	Progressive Building Society	
250	Provident Financial Group	
251	PT Bank Negara Indonesia (Persero) Tbk - London Branch	
252	Punjab National Bank (International) Limited	
253	Qatar National Bank (Q.P.S.C) ²⁶	
254	QIB (UK) plc	
255	Rabobank	
256	Raiffeisen International Bank AG - London branch	
257	Rathbone Brothers plc	
258	RCI Banque UK	
259	Reliance Bank Limited	
260	Riyad Bank - London Branch	
261	Royal Bank of Canada	
262	Royal Bank of Scotland Group plc, The	NatWest Markets plc ²⁷ , National Westminster Bank plc, Ulster Bank Ltd, Coutts and Company, and The Royal Bank of Scotland plc ²⁸

²⁵ PCF Bank Limited adopted the Code in the period this report covers.

²⁶ Name change from Qatar National Bank SAQ to Qatar National Bank (Q.P.S.C).

²⁷ Name change from The Royal Bank of Scotland plc to NatWest Markets plc after the end of the reporting period.

²⁸ Name change from Adam and Company plc to The Royal Bank of Scotland plc after the end of the reporting period.

Banks, Building Societies and Other Financial Institutions "Banks" Adopting or Readopting The Code of Practice on Taxation for Banks at 31 March 2018

This list includes all banks that have unconditionally adopted or readopted the Code. Adoption will cover all a group's operations in the UK and, in the majority of cases, only an agreed principal name for the overall adopting group is shown.

Where requested HMRC has agreed to include names in addition to the principal group name if:

- The names on the Prudential Regulation Authority lists are so different that it would not be obvious that they are connected and covered by the same adoption, or
- A group operating in the UK does so through separately named and independently managed entities and their names are so different that it would not be obvious that they are connected.

	Principal Name	Adoption Includes
263	Saffron Building Society	
264	Sainsbury's Bank plc	
265	Samba Financial Group - London Branch	
266	Santander	
267	Schroders plc	
268	Scottish Building Society	
269	Secure Trust Bank	
270	Shanghai Commercial Bank Limited	
271	Shawbrook Bank Limited	
272	Shinhan Bank - London Branch	
273	Siemens Bank GmbH	
274	Silicon Valley Bank UK Branch	
275	Skandinaviska Enskilda Banken AB	
276	Skipton Building Society	
277	Smith and Williamson Investment Services Ltd	
278	Société Générale	Kleinwort Benson ²⁹
279	Sonali Bank (UK) Limited	
280	Stafford Railway Building Society	
281	Standard Chartered Bank	
282	Starling Bank Limited ³⁰	
283	State Bank of India	
284	State Street	
285	Sumitomo Mitsui Banking Corporation Europe	
286	Sumitomo Mitsui Trust Bank Limited	
287	Svenska Handelsbanken AB (publ)	Svenska Handelsbanken AB (publ) UK Branch and Handelsbanken Finans AB (publ) UK Branch
288	Swansea Building Society	
289	Syndicate Bank - London Branch	
290	T C Ziraat Bankasi	
291	Tandem Bank Limited ³¹	
292	TD Bank Group	
293	Teachers Building Society	

²⁹ Kleinwort Benson were previously listed separately and are now part of Societe Generale.

³⁰ Starling Bank Limited adopted the Code in the period this report covers.

³¹ Name change from Harrods Bank to Tandem Bank Limited

Banks, Building Societies and Other Financial Institutions "Banks" Adopting or Readopting The Code of Practice on Taxation for Banks at 31 March 2018

This list includes all banks that have unconditionally adopted or readopted the Code. Adoption will cover all a group's operations in the UK and, in the majority of cases, only an agreed principal name for the overall adopting group is shown.

Where requested HMRC has agreed to include names in addition to the principal group name if:

- The names on the Prudential Regulation Authority lists are so different that it would not be obvious that they are connected and covered by the same adoption, or
- A group operating in the UK does so through separately named and independently managed entities and their names are so different that it would not be obvious that they are connected.

	Principal Name	Adoption Includes
294	Tesco Bank	
295	Tipton & Coseley Building Society	
296	Triodos Bank NV	
297	TSB Banking Group and Subsidiaries (TSB Group)	TSB Banking Group, TSB Bank plc, TSB Scotland Nominees Ltd, TSB Scotland (Investment) Nominees Ltd.
298	Turkish Bank (UK) Ltd	
299	Turkiye Is Bankasi AS - London Branch	
300	UBS AG	
301	UniCredit Banking Group	
302	Union Bancaire Privée UBP SA	
303	Union Bank of India (UK) Limited	
304	Union Bank UK plc	
305	United National Bank Limited	
306	United Overseas Bank Limited	
307	Unity Trust Bank plc	
308	United Trust Bank Limited	
309	Vernon Building Society	
310	Virgin Money	
311	Volkswagen bank GMBH	
312	VTB Capital plc	
313	Weatherbys Bank Limited	
314	Wells Fargo & Co	
315	Wesleyan Bank Limited	
316	West Bromwich Building Society	
317	Western Union International Bank GmbH	
318	Westpac Banking Corp - London	
319	Woori Bank - London Branch	
320	Wyelands Bank plc	
321	Yorkshire Building Society	
322	Zenith Bank (UK) Limited	

Annex C: List of banks which had not adopted Code at 31 March 2018

Banks, Building Societies and Other Financial Institutions "Banks" who had not Adopted The Code of Practice on Taxation for Banks at 31 March 2018	
The list is drawn from banks that HMRC know to be in the bank levy population (ignoring the £20billion threshold) and banks on the list of Banks and Building Societies at 31 March 2017 as published by the Prudential Regulatory Authority	
	Principal Name
1	Agricultural Bank of China Ltd London Branch ³²
2	Bank of Baroda (UK) Ltd ³³
3	BFC Bank Ltd ³⁴
4	BGC Brokers L.P.
5	Cantor Fitzgerald Europe
6	DekaBank Deutsche Girozentrale ³⁵
7	Hauck & Aufhauser Privatbankiers Kommanditgesellschaft ³⁶
8	Kookmin Bank Co Ltd London Branch ³⁷
9	Redwood Bank Ltd ³⁸
10	Shanghai Pudong Development Bank Co Ltd ³⁹
11	United Bank for Africa (UK) Limited ⁴⁰

³² Agricultural Bank of China Ltd London Branch has adopted the Code since 31 March 2018.

³³ Bank of Baroda (UK) Ltd has adopted the Code since 31 March 2018.

³⁴ BFC Bank Ltd has adopted the Code since 31 March 2018.

³⁵ DekaBank Deutsche Girozentrale has adopted the Code since 31 March 2018.

³⁶ Hauck & Aufhauser Privatbankiers Kommanditgesellschaft has adopted the Code since 31 March 2018.

³⁷ Kookmin Bank Co Ltd London Branch has adopted the Code since 31 March 2018.

³⁸ Redwood Bank Ltd has adopted the Code since 31 March 2018.

³⁹ Shanghai Pudong Development Bank Co Ltd has adopted the Code since 31 March 2018.

⁴⁰ United Bank for Africa (UK) Limited has adopted the Code since 31 March 2018.