

ATTACHMENT D-1**ENHANCED COMPLIANCE SELF-REPORTING REQUIREMENTS**

NatWest Markets Plc (the “Company”), on behalf of itself and its direct and indirect U.S. subsidiaries, agrees that it will report to the United States Department of Justice, Criminal Division, Fraud Section and the United States Attorney’s Office for the District of Connecticut (collectively, the “Fraud Section and the Office”) periodically. The enhanced reporting obligations detailed below replace the Company’s previous obligation to retain a Monitor as part of its Plea Agreement entered into on December 21, 2021.

During the Term, the Company shall continue to review, test, and update its compliance program and internal controls, trading surveillance protocols, data management system related to trade surveillance, policies, and procedures related to the Company’s current and ongoing compliance with Securities and Commodities Laws as defined in Attachment C. The Company shall be required to: (i) conduct a review building upon and addressing recommendations and findings in the Monitor’s written reports and submit a first report, and (ii) conduct and prepare a follow-up review and a second, final report, as described below. Prior to conducting each review, the Company shall be required to prepare and submit a work plan for the review. The Company shall also, at no less than three-month intervals during the Term, meet with the Fraud Section and the Office regarding remediation, implementation and testing of its compliance program and internal controls, trade surveillance protocols, data management system related to trade surveillance, policies, and procedures described in Attachment C.

In conducting the reviews, the Company shall undertake the following activities, among others: (a) implementation, testing, and incorporation of the outstanding recommendations and findings in the Monitor’s written reports; (b) inspection of relevant documents, including the

Company's current policies, procedures, and training materials concerning compliance with the Securities and Commodities Laws; (c) implementation and incorporation of the forthcoming trade surveillance system, as well as testing of any active trade surveillance enhancements; (d) inspection and testing of the Company's systems procedures and internal controls, including record-keeping, trade surveillance and related data, and internal audit procedures; (e) meetings with, and interviews of, relevant current and, where appropriate, former directors, officers, employees, business partners, agents, and other persons; and (f) analyses, studies, and, comprehensive testing of the Company's compliance program. If the Company engages third-party consultants or advisors to assist in conducting reviews consistent with the Plea Agreement Amendment and this Attachment D-1, it agrees to make such third-party consultants or advisors available to communicate with the Fraud Section and the Office upon request, subject to applicable privilege and local law (such as relevant data protection and labor laws).

Written Work Plans, Reviews and Reports

1. The Company shall conduct a first review and prepare a first report, followed by a follow-up review and final report.
2. Following consultation with the Fraud Section and the Office, on July 1, 2025, the Company's submitted a written work plan outlining the Company's first review. The Fraud Section and the Office will provide comments on and/or approve the work plan on or before July 31. If the Fraud Section and the Office do not approve the initial work plan, the Company shall have fourteen (14) days to provide a revised work plan to the Fraud Section and the Office for review and approval.
3. With respect to the follow-up review and final report, after consultation with the Fraud Section and the Office, the Company shall prepare a written work plan within thirty (30)

calendar days of the submission of the first report, and the Fraud Section and the Office shall provide comments within thirty (30) calendar days after receipt of the written work plan.

4. All written work plans shall identify with reasonable specificity the activities the Company plans to undertake to review and test each element of its compliance program, as described in Attachment C. In particular, and in addition to general information regarding the implementation of outstanding recommendations, work plans shall include: (a) timeline for selection and integration of voice and electronic communications surveillance vendors; (b) timeline and status updates on the operationalization of the replacement trade surveillance system; and (c) timeline and status updates related to the incorporation and testing of the Company's trade surveillance-related data.

5. Any dispute with respect to any written work plan shall be decided by the Fraud Section and the Office in their exclusive discretion.

6. No later than six (6) months from the date this Amendment is executed, the Company shall submit to the Fraud Section and the Office a written report setting forth: (1) a complete description of its remediation efforts to date; (2) a complete description of the testing conducted to evaluate the effectiveness of the compliance program and the results of that testing; (3) the progress made on implementation and integration of the replacement trade surveillance and related data-protocols and systems; and (4) its proposals to ensure that its compliance program is reasonably designed, implemented, and enforced so that the program is effective in deterring and detecting violations of the Securities and Commodities Laws. The report shall be transmitted to:

Deputy Chief – MIMF Unit
Deputy Chief – CEC Unit
Criminal Division, Fraud Section
United States Department of Justice
1400 New York Avenue N.W.
Washington, D.C. 20005

and

Jonathan Francis
Assistant United States Attorney
U.S. Attorney's Office for the District of Connecticut
Connecticut Financial Center
157 Church Street, 25th Floor
New Haven, CT 06510
Jonathan.Francis@usdoj.gov

The Company may extend the time period for issuance of the first report with prior written approval of the Fraud Section and the Office.

Follow-up Review and Final Report

7. The Company shall undertake a follow-up review and final report, incorporating the views of the Fraud Section and the Office on the Company's prior review and report to further monitor and assess whether the Company's compliance program is reasonably designed, implemented, and enforced so that it is effective at deterring and detecting violations of policies and procedures governing compliance with the Securities and Commodities Laws.

8. The final report shall include a sustainability plan for ongoing improvement, testing, a review of the compliance program to ensure future viability of the program, and an analysis of the framework, functionality, effectiveness, and continuance plan for the trade surveillance and related data protocols and systems. The final report shall be completed and delivered to the Fraud Section and the Office no later than thirty (30) days before the end of the Term.

9. The Company may extend the time period for submission of any of the follow-up reports with prior written approval of the Fraud Section and the Office.

Meetings During the Term

10. Within thirty (30) calendar days of each report, the Company shall meet with the Fraud Section and the Office to discuss that report and any other matter deemed appropriate by the Fraud Section and the Office in their exclusive discretion.

11. At least quarterly, and more frequently if the Fraud Section and the Office deem it appropriate in their exclusive discretion, the Company will meet with the Fraud Section and the Office to discuss the status of the review and enhanced self-reporting obligations, and any suggestions, comments, or improvements the Company may wish to discuss with or propose to the Fraud Section and the Office.

12. Per Paragraph 10(c) of the Plea Agreement, the Fraud Section and the Office may require the attendance of relevant Company representatives or employees at any of the foregoing meetings.

Confidentiality of Submissions

Submissions by the Company, including the work plans and reports, will likely include proprietary, financial, confidential, and competitive business information. Moreover, public disclosure of the submissions could discourage cooperation, impede pending or potential government investigations and thus undermine the objectives of the reporting requirement. For these reasons, among others, the submissions and the contents thereof are intended to remain and shall remain non-public, except as otherwise agreed to by the parties in writing, or except to the extent the Fraud Section and the Office determines in their exclusive discretion that disclosure would be in furtherance of their duties and responsibilities or is otherwise required by law.