

Environmental and Social Risk

27 February 2026

Adult Entertainment Risk Acceptance Criteria

Terms with an asterisk * are defined in the glossary below

Background

We recognise that the activities of our customers can have Environmental & Social (E&S) impacts – including polluting activities and the potential for human rights violations. The E&S Risk Framework forms part of NatWest Group's overall reputational risk policy and requires enhanced due diligence to be performed for certain customer relationships, transactions, activities and projects.

It is comprised of E&S Risk Acceptance Criteria (RAC) for seven sectors which present heightened E&S risk and a RAC for human rights. Customers whose activities fall within a sector RAC, or any other customer where associated E&S risk concerns have been identified, are subject to enhanced due diligence.

We expect all customers to comply with all applicable laws, regulations, and licensing conditions relevant to their operations.

We also have an E&S risk concerns process which seeks to ensure that E&S risk is identified and managed for customers and transactions in sectors which are not covered by a RAC, or where there may be multiple issues or complexities.

Scope

The E&S Risk Framework applies to all legal entities in NatWest Group for the on-boarding of non-personal customers for the purpose of providing Financing* and applies to the management of E&S risk throughout these customers' life cycles.

Context

This Risk Acceptance Criteria covers companies in the adult entertainment sector. This includes companies involved in producing and broadcasting pornographic material; sex shops/cinemas and Sexual Entertainment Venues (including lap dancing clubs and strip shows).

NatWest Group acknowledges the risks associated around the adult entertainment sector, which include the promotion of gender inequality, ease of access to pornography, human trafficking, forced and child labour, and links to prostitution, drugs, crime and money laundering risk. NatWest Group provides individuals working legally in this sector with banking services subject to them meeting the product/service eligibility criteria and passing standard onboarding checks.

Prohibited

- Owners/operators of brothels, businesses facilitating prostitution.
- Sexual Entertainment Venues*.
- Unlicensed Physical Sex Shops*.
- Production of Pornography* where the company is in breach of regulatory standards.

Restricted

We conduct enhanced due diligence for:

- Publishers, producers and broadcasters of Pornography (TV, film and online demand programme services*).
- Licensed Physical Sex Shops.
- Licensed sex cinemas.
- Sex chatlines/chatrooms (TV, internet or telephonic).
- Online Sex Shops*, dependent on provision of a satisfactory company statement confirming no sale of pornography at R18 classification or with explicit content beyond R18 classification, and that effective age verification controls are in place.
- Entertainment companies that offer the services of strippers (including nightclubs, pubs, stripogram services).
- Other entertainment–burlesque clubs, bunny clubs, event companies involved in erotica.
- Dating websites and applications.

Glossary - Terms with an asterisk * are defined in the glossary below

Item	Definition
Online Demand Programme Service	Conditions of qualifying as ODPS which is regulated by OFCOM is: content comparable to TV (adult content is specified), on-demand access, there is editorial control, available to public and should be under UK jurisdiction.
Sexual Entertainment Venues	Premises which their primary purpose is to provide any live performance or live display of nudity which is solely or principally for the purpose of sexually stimulating any member of an audience (whether by verbal or other means) and provides financial gain for the organiser or the entertainer. This includes lap dancing, pole dancing, table dancing, strip shows, peep shows, live sex shows.
Sex Shops	Shops where the primary purpose of a business is the retail sale of pornographic magazines and / or DVDs and sex toys.
Pornography	Printed, audio or visual material that has been classified, or contains images or audio equivalent to the classification of, R18 by the BBFC. This includes visual material depicting real and/or explicit description or display of sexual acts by/between consenting adults, or graphic imagery of reproductive organs, primarily intended to stimulate sexual arousal or stimulation.