Independent Limited Assurance Report to Clydesdale Bank plc

KPMG LLP (‘KPMG’ or ‘we’) were engaged by Clydesdale Bank plc (‘Clydesdale’) to provide limited assurance over the Selected Information described below for the year ended 30 June 2021.

Our conclusion

Based on the work we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the Selected Information listed in Appendix A has not been properly prepared, in all material respects, in accordance with the Reporting Criteria.

This conclusion is to be read in the context of the remainder of this report, in particular the inherent limitations explained below and this report’s intended use.

Selected Information

The scope of our work includes only the information included in Appendix A for the year ended 30 June 2021 and included within the “Strategic report Environmental, social and governance” section (‘the Report’) of the Virgin Money Annual Report and Accounts (prepared for the year ended 30 September 2021) and marked with the symbol * (‘the Selected Information’, as detailed in Appendix A).

We have not performed any work, and do not express any conclusion, over any other information that may be included in the Report or displayed on Virgin Money’s website for the current year or for previous periods unless otherwise indicated.

Reporting Criteria

The Reporting Criteria we used to form our judgements are ‘The Virgin Money Environmental Reporting Criteria’ as set out at https://www.virginnoneyukplc.com/corporate-responsibility/environment/ (‘the Reporting Criteria’). The Selected Information needs to be read together with the Reporting Criteria.

Inherent limitations

The nature of non-financial information; the absence of a significant body of established practice on which to draw; and the methods and precision used to determine non-financial information, allow for different, but acceptable evaluation and measurement techniques and can result in materially different measurements, affecting comparability between entities and over time.

Directors’ responsibilities

The Directors of Clydesdale are responsible for:

- designing, implementing and maintaining internal controls relevant to the preparation and presentation of the Selected Information that is free from material misstatement, whether due to fraud or error;
- selecting and/or developing objective Reporting Criteria;
- measuring and reporting the Selected Information in accordance with the Reporting Criteria; and
- the contents and statements contained within the Report and the Reporting Criteria.

Our responsibilities

Our responsibility is to plan and perform our work to obtain limited assurance about whether the Selected Information has been prepared in accordance with the Reporting Criteria and to report to Clydesdale in the form of an independent limited assurance conclusion based on the work performed and the evidence obtained.

Assurance standards applied


The work performed in a limited assurance engagement varies in nature and timing from, and is less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Independence, professional standards and quality control

We comply with the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants and we apply International Standard on Quality Control (UK) 1, ‘Quality Control for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance and Related Services Engagements’ issued by the UK Financial Reporting Council. Accordingly, we maintain a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements and professional standards (including independence, and other requirements founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour) as well as applicable legal and regulatory requirements.

Summary of work performed

Considering the level of assurance and our assessment of the risk of material misstatement of the Selected Information, whether due to fraud or error, our work included, but was not restricted to:

- assessing the appropriateness of the Reporting Criteria for the Selected Information;
- conducting interviews with Clydesdale management to understand the key processes, systems and controls in place over the preparation of the Selected Information;
- agreeing a selection of the Selected Information to the corresponding supporting information;
- considering the appropriateness of the carbon conversion factor calculations and other unit conversion factor calculations, referred to by reference to widely recognised and established conversion factors;
- reperforming a selection of the carbon conversion factor calculations and other unit conversion factor calculations;
- performing analytical review procedures over the aggregated Selected Information, including a comparison to the prior period’s amounts having due regard to changes in business volume and the business portfolio; and
- reading the Report and narrative accompanying the Selected Information in the Report with regard to the Reporting Criteria, and for consistency with our findings.

This report’s intended use

This assurance report is made solely to Clydesdale in accordance with the terms of the engagement contract between us. Those terms permit disclosure to other parties, solely for the purpose of Clydesdale showing that it has obtained an independent assurance report in connection with the Selected Information.

We have not considered the interest of any other party in the Selected Information. To the fullest extent permitted by law, we accept no responsibility and deny any liability to any party other than Clydesdale for our work, for this assurance report or for the conclusions we have reached.

KPMG LLP
Chartered Accountants
London
24 November 2021

The maintenance and integrity of Virgin Money’s website is the responsibility of the Directors of Clydesdale; the work carried out by us does not involve consideration of these matters and, accordingly, we accept no responsibility for any changes that may have occurred to the reported Selected Information, Reporting Criteria or Report presented on Virgin Money’s website since the date of our report.
Appendix A

The underlying selected information that constitutes the Selected Information are listed below. The information in this Appendix needs to be read together with the attached limited assurance report and the Reporting Criteria.

<table>
<thead>
<tr>
<th>Underlying Selected Data</th>
<th>Selected Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>GHG emissions (tCO₂e) – Scope 1 (location-based method)</td>
<td>4,066</td>
</tr>
<tr>
<td>GHG emissions (tCO₂e) – Scope 1 (market-based method)</td>
<td>3,245</td>
</tr>
<tr>
<td>GHG emissions (tCO₂e) – Scope 2 (location-based method)</td>
<td>7,678</td>
</tr>
<tr>
<td>GHG emissions (tCO₂e) – Scope 2 (market-based method)</td>
<td>908</td>
</tr>
<tr>
<td>GHG emissions (tCO₂e) for Scope 1 and Scope 2 (location-based) per average FTE</td>
<td>1.54</td>
</tr>
</tbody>
</table>