COMPETITION APPEAL TRIBUNAL CASE NO. 1761/7/7/26

NOTICE OF COLLECTIVE PROCEEDINGS ORDER APPLICATION AND HEARING

Individuals who acquired or held a personal current account, savings account, credit card, mortgage or personal loan approved by UK-based financial institutions could benefit from proposed collective proceedings

This is a legal notice that has been issued at the direction of the Competition Appeal Tribunal

The Application

- James Daley Class Representative LLP ("**James Daley CRL**") filed an application on **22 January 2026** with the Competition Appeal Tribunal (the "**Tribunal**") to be authorised as class representative and to bring opt-out collective proceedings against Apple Inc., Apple Distribution International Limited, Apple (UK) Limited, Apple Europe Limited, Apple Payment Services Limited (collectively, "**Apple**").
- A class representative can pursue collective proceedings on behalf of a group of persons for an alleged infringement of competition law arising from the same, similar, or related issues of fact or law. For collective proceedings to be brought, the Tribunal must make a collective proceedings order (a "**CPO**"). To determine this, the Tribunal will have a hearing and will consider if the proposed class representative should be authorised to act as the class representative and whether the claim can proceed as opt-out collective proceedings.

The CPO Hearing

- James Daley CRL made an application to the Tribunal for a CPO on **22 January 2026**. A hearing to determine this application has been scheduled to commence on **22 April 2027 at 10.30am**. The hearing will last for one day (with one day (23 April 2027) in reserve) and will take place at the **Competition Appeal Tribunal, Salisbury Square House, 8 Salisbury Square, London EC4Y 8AP**. The hearing may be followed virtually via the Tribunal's website (a "Watch now" link to view the hearing will appear on the hearing date under the Diary list on the following pages: https://www.catribunal.org.uk/ and https://www.catribunal.org.uk/diary).

The claim

- The claim alleges that Apple has abused a dominant position by: (i) unlawfully refusing third party access to the near-field communication ("**NFC**") chip, which is essential for making

contactless payments in-store on Apple devices, therefore blocking alternative mobile wallets; and (ii) illegally tying Apple Pay's in-store mobile wallet with the online digital wallet and unfairly favoring Apple Pay on online payments, therefore foreclosing rivals. It is alleged that Apple charges banks and card issuers fees for consumers in-store and online transactions which are not in line with the industry practice and are ultimately borne by UK consumers.

- As a result, James Daley CRL alleges that individuals in the UK who, during the Claim Period, acquired or held a personal current account, savings account, credit card, mortgage or personal loan approved by UK-based financial institutions (the "**Proposed Class**") have faced higher charges. Further detail on the Proposed Class and Claim Period is set out in Question 6.
- To learn more about James Daley CRL's proposed claim, please visit: Apple Pay UK: Compensation claim over unfair banking charges - Consumer Voice or https://www.catribunal.org.uk/cases/17617726-james-daley-class-representative-llp.

Next steps

- This is an "opt-out" claim. Therefore, if the claim is certified, the members of the Proposed Class who are domiciled in the UK will automatically be included in the claim, and therefore bound by any judgment or settlement, unless they choose to opt-out. Those who fall within the class definition but are not currently domiciled in the UK will have the opportunity to opt-in to the claim. For more details, please visit Apple Pay UK: Compensation claim over unfair banking charges - Consumer Voice.
- If the CPO is granted, James Daley CRL will issue a further notice with more details. At this point, there will be further procedural steps before the proceedings go to trial.

Your Legal Rights and Options Now	
Object to the application of the Proposed Class Representative	Any person with an interest (including any Proposed Class Member) may object to the application for a CPO, or the authorisation of the proposed class representative (James Daley CRL), by stating their reasons for objecting in writing to be received by the Tribunal by **24 December 2026 at 4pm**. For further details, see Question 8 below.
Apply to make oral / written submissions to the Tribunal	Any person with an interest (including any member of the Proposed Class) may apply to the Tribunal for permission to make written and/or oral submissions at the hearing commencing on **22 April 2027**. Any such application must be made in writing, supported by reasons, and received by the Tribunal by **24 December 2026 at 4pm**.
Contact details	To learn more about the application to bring the claim, visit Apple Pay UK: Compensation claim over unfair banking charges - Consumer Voice and/or https://www.catribunal.org.uk/cases/17617726-james-daley-class-representative-llp.

GENERAL INFORMATION

1. Why has this notice been issued?

The Tribunal has directed that this notice be issued ahead of the hearing scheduled to commence on **22 April 2026** to determine James Daley CRL's application for a CPO. At this hearing the Tribunal will consider: (i) the suitability of the claim to proceed as opt-out collective proceedings on behalf of eligible Class Members; and (ii) the suitability of James Daley CRL to act as the class representative.

This notice has been issued to inform you of your right to object to the application for a CPO or the authorisation of James Daley CRL as the class representative. Please read this notice carefully. It explains what the claim is about, who is included, your right to object to the application for a CPO or the authorisation of James Daley CRL as the class representative, and what action you need to take at this stage (if any).

2. What is the Competition Appeal Tribunal?

The Tribunal is a specialist UK court for competition law disputes, including proposed collective proceedings like these. Information about the Tribunal, its Rules, Guidance, and cases is available at www.catribunal.org.uk.

A summary of this claim against Apple can be found on the Tribunal's website at https://www.catribunal.org.uk/cases/17617726-james-daley-class-representative-llp.

3. Who is the proposed claim against?

The claim is against Apple Inc. and certain of its subsidiaries, including in the UK.

4. What is Apple alleged to have done wrong? What are the collective proceedings about?

The claim alleges that Apple has refused third parties' access to NFC technology, and through this conduct, Apple has secured Apple Pay as the only solution available to iPhone users in the UK who wish to make contactless payments in-store using their Apple devices. It is alleged that Apple also ties Apple Pay as an in-store mobile wallet with its digital wallet offering and is therefore able to unfairly promote Apple Pay for online transactions to the detriment of rival online payment solutions.

The claim alleges that Apple charges banks and card issuers fees for in-store and online transactions which are not in line with the industry practice. It is alleged that these additional fees are ultimately borne by UK consumers, as they are passed on by relevant financial institutions through higher costs across a range of personal banking and financial products.

5. Who is James Daley?

James Daley is a leading consumer campaigner with over 25 years' experience fighting for fairness in financial services. He is the founder of Fairer Finance and a trusted media commentator, regularly appearing on programmes such as Watchdog, Rip-off Britain and Moneybox. James Daley CRL is a limited liability partnership (company number OC454929) that was established for the specific purpose of bringing these proceedings. James Daley has full control over the James Daley CRL

As the PCR, James Daley will be responsible for the claim, and the role includes: (i) making key supervisory decisions throughout the claim including whether to settle the claim; (ii) taking advice from, and providing instructions to, the lawyers and experts; and (iii) communicating with, and promoting the claim to, the Proposed Class including supervising the distribution of any damages to class members.

The class representative has obligations to act in the best interest of the class when fulfilling its role. For more information on the role of the class representative please visit Apple Pay UK: Compensation claim over unfair banking charges - Consumer Voice.

WHAT DOES THE CPO APPLICATION ASK FOR?

6. Who would be in the Proposed Class?

The CPO application asks the Tribunal to allow the proposed collective proceedings to proceed on an opt-out basis, meaning anyone who meets the criteria for the Proposed Class (the "**Class Definition**") will be included in the claim automatically unless they expressly 'opt-out'.

The Proposed Class includes every individual who lived in the UK and acquired or held a Relevant Product, while aged 16 or over, during the period 22 January 2020 until 22 January 2026 (the "**Claim Period**"). A "**Relevant Product**" means a personal current account, savings account, credit card, mortgage or personal loan approved by a bank or other financial institution that participates in Apple Pay. These include Barclays UK, The Co-operative Bank, HSBC UK, Lloyds Banking Group (including Halifax and Bank of Scotland brands), Nationwide Building Society, NatWest Group (including RBS and Ulster Bank brands), Santander UK, TSB, Virgin Money UK.

In respect of any person who meets the Class Definition but has subsequently died, the Class shall include their lawful representatives, successors or assignees.

7. How much money does the claim seek?

The claim seeks aggregate damages of up to £1.49 billion for the class as a whole. Any aggregate award of damages will then need to be distributed to eligible class members that come forward to claim their share.

HOW TO OBJECT TO THE COLLECTIVE PROCEEDINGS ORDER APPLICATION OR TO THE CLASS REPRESENTATIVE

8. Who can object and what can I object to?

Any person with an interest (including any member of the Proposed Class) may object to the application for a CPO or the authorisation of James Daley CRL as the class representative.

If you wish to file an objection, you can write to the Tribunal stating your reasons for objecting and send it **by email** to registry@catribunal.org.uk or **by post** to The Registrar, Competition Appeal Tribunal, Salisbury Square House, 8 Salisbury Square, London EC4Y 8AP, so it is received **no later than 24 December 2026 at 4pm.**

When writing to the Tribunal you must include the following reference 'James Daley Class Representative Limited v Apple, Case No. 1761/7/7/26'.

Any person with an interest (including any member of the Proposed Class) can also apply to the Tribunal for permission to make written and/or oral submissions at the hearing of the application for a CPO commencing on **22 April 2027**. Any such application must be made in writing, supported by reasons, and sent **by post** to the above address or **by email** to registry@catribunal.org.uk **so it is received no later than 24 December 2026 at 4pm.**

GETTING MORE INFORMATION

9. How can I stay updated on the progress of the claim?

You can visit Apple Pay UK: Compensation claim over unfair banking charges - Consumer Voice for regular updates, to register your interest and for more information on the claim.

10. Who is funding the claim?

To finance this claim, James Daley CRL has entered into a Litigation Funding Agreement with Omni Bridgeway. A copy of this agreement can be accessed on the documents section of Apple Pay UK: Compensation claim over unfair banking charges - Consumer Voice and further detail is available in the FAQ section.

The Proposed Class do not have to pay anything to be involved in the claim and will not be liable for any costs. James Daley CRL has put in place after-the-event insurance to cover the Defendants' legal costs if the claim is not successful.