

The complaint

Mr L complains that Wise Payments Limited failed to intervene when he was suffering from a gambling disorder.

What happened

Mr L had an account with Wise. He says he was using the account to receive and send funds, much of which he'd stolen from his employer. He says the funds were ultimately converted into cryptocurrency and then lost on an online casino.

Mr L believes Wise should have intervened. He's referred in particular to the Financial Conduct Authority (FCA)'s guidance on the consumer duty, fair treatment of vulnerable customers, and Wise's anti-money-laundering obligations. He wants us to determine whether Wise complied with its regulatory obligations, whether the harms were foreseeable, and whether his complaint has been fairly addressed in line with FCA expectations.

Our investigator looked at all of this, but didn't think it should be upheld. Mr L doesn't agree. The complaint has been referred to me to decide.

What I've decided – and why

I've considered all the available evidence and arguments to decide what's fair and reasonable in the circumstances of this complaint.

I am not the regulator. It's not my primary role to supervise financial businesses or enforce their compliance with their legal and regulatory obligations. Instead, I am required to determine complaints based on what is, in my opinion, fair and reasonable in the circumstances of the case.

Here, the crux of Mr L's complaint is that Wise should have stopped him transferring fraudulent funds. He used the account to receive funds from the fraud and then transfer them onwards to other accounts. He thinks Wise should have conducted enhanced due diligence and if it had done so, it might have limited the scale of his offending.

I've carefully considered what Mr L has said. But I don't uphold the complaint. Mr L accepts he opened the account to move the proceeds of fraud. With this in mind, it wouldn't be fair for me to award any compensation – given any failings arose from Mr L's own criminal conduct. And that means it's not necessary for me to reach firm conclusions about Wise's wider legal and regulatory obligations: these don't change the outcome of Mr L's complaint. Regardless of whether Wise should have done more, I'm not going to tell them to do anything further to put things right.

It's possible Wise might have done more here. But it would be speculative for me to conclude that this would have left Mr L in any better position. In particular, I'm not persuaded that had Wise asked Mr L more about what was happening that Mr L would have given a truthful explanation of what was happening. Wise was not aware that these funds might be fraudulent until some time after they'd already left the account. And Mr L appears to have

opened the account with the express purpose of moving the funds – and so even if Wise had, for instance, closed or restricted the account its most likely Mr L would have just sought alternative ways of moving the funds.

My final decision

I don't uphold the complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr L to accept or reject my decision before 8 April 2026.

Rebecca Hardman
Ombudsman