

HSBC's Global Sanctions Policy Statement

HSBC is committed to combatting financial crime and complying with all applicable sanctions laws and regulations in the jurisdictions in which we operate. One of the ways in which we meet this objective is through HSBC's Global Financial Crime Policy (the "Policy"). Subject to the primacy of local law and considering broader financial crime risk, the Policy seeks to establish a globally consistent standard to effectively manage sanctions compliance risk across all HSBC wholly or majority-owned or controlled legal entities, helping us to protect the global financial system, our reputation and to best serve our customers. The Policy generally prohibits relationships or transactions involving sanctioned individuals and entities or comprehensively sanctioned countries, territories, and their governments.¹

In compliance with our regulatory requirements and our Policy we may be required from time to time to reject transactions, freeze assets or refuse to provide services. It also means that at times, our Policy and sanctions risk appetite may be stricter than our legal obligations, and we may choose not to support certain customer relationships or business activity even if it is legally permitted. HSBC may, in its sole discretion, agree to process certain transactions prohibited or restricted under the Policy that are authorised by a licence from an appropriate authority or are otherwise permitted under applicable laws and regulation, such as those which relate to humanitarian aid. These transactions will be considered by HSBC on a case-by-case basis.

¹ The Policy is primarily derived from the laws, regulations and regulatory guidance of the UN, UK and US. HSBC Continental Europe (Spółka Akcyjna) Oddział w Polsce being a branch of HSBC Continental Europe also complies with EU, French and Polish sanctions.