



Independent Limited Assurance Report to the Directors of HSBC Holdings plc

The Board of Directors of HSBC Holdings plc (“HSBC”) engaged us to provide limited assurance on the information described below and disclosed online at <https://www.hsbc.com/our-approach/esg-information/esg-reporting-and-policies>ⁱ in respect of the 2019 reporting year.

Our conclusion

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the Selected Information for the 2019 reporting year has not been prepared, in all material respects, in accordance with the Reporting Criteria.

This conclusion is to be read in the context of what we say in the remainder of our report.

Selected Information

The scope of our work was limited to assurance over the information disclosed online at <https://www.hsbc.com/our-approach/esg-information/esg-reporting-and-policies>ⁱ (the “Selected Information”) for the 12 months to 30 September 2019.

CO ₂ e emissions from energy (Scope 1 & 2) (tonnes) – Market based	414,000
CO ₂ e emissions from energy (Scope 1 & 2) (tonnes) – Location based	527,000
CO ₂ e emissions from travel (tonnes)	116,000

The Selected Information is summarised in the table above. Our assurance does not extend to information in respect of earlier periods or to any other information disclosed by HSBC in respect of 2019 reporting year.

Professional standards applied and level of assurance

We performed a limited assurance engagement in accordance with International Standard on Assurance Engagements 3000 (Revised) ‘Assurance Engagements other than Audits and Reviews of Historical Financial Information’ in accordance with International Standard on Assurance Engagements 3410 ‘Assurance engagements on greenhouse gas statements’, issued by the International Auditing and Assurance Standards Board. A limited assurance engagement is substantially less in scope than a reasonable assurance engagement in relation to both the risk assessment procedures, including an understanding of internal control, and the procedures performed in response to the assessed risks.

Our Independence and Quality Control

We applied the Institute of Chartered Accountants in England and Wales (ICAEW) Code of Ethics, which includes independence and other requirements founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour. We apply International Standard on Quality Control (UK) 1 and accordingly maintain a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements. Our work was carried out by a team with experience in sustainability reporting and assurance.

Understanding reporting and measurement methodologies

The Selected Information needs to be read and understood together with the Reporting Criteria (“HSBC CO₂ Emission Reporting Guidance”, available on HSBC’s websiteⁱ), which HSBC is solely responsible for selecting and applying. The absence of a significant body of established practice on which to draw to evaluate and measure non-financial information allows for different, but acceptable, measurement techniques and can affect comparability

between entities and over time. The Reporting Criteria used for the reporting of the Selected Information are as at 30 September 2019.

Work done

We are required to plan and perform our work in order to consider the risk of material misstatement of the Selected Information. In doing so, we:

- made enquiries of HSBC’s management;
- evaluated the design of the key structures, systems, processes and controls for managing, recording and reporting the Selected Information. This included analysing a number of sites, selected on the basis of their inherent risk and materiality to the group, to understand the key processes and controls for reporting site performance data to the group team;
- performed limited substantive testing on a selective basis of the Selected Information at corporate head office and in relation to 9 sites to check that data had been appropriately measured, recorded, collated and reported; and
- considered the disclosure and presentation of the Selected Information.

HSBC’s responsibilities

The Directors of HSBC are responsible for:

- designing, implementing and maintaining internal controls over information relevant to the preparation of the Selected Information that is free from material misstatement, whether due to fraud or error;
- establishing objective Reporting Criteria for preparing the Selected Information;
- measuring and reporting the Selected Information based on the Reporting Criteria; and
- the content of the Sustainability section of the websiteⁱ.

Our responsibilities

We are responsible for:

- planning and performing the engagement to obtain limited assurance about whether the Selected Information is free from material misstatement, whether due to fraud or error;
- forming an independent conclusion, based on the procedures we have performed and the evidence we have obtained; and
- reporting our conclusion to the Directors of HSBC.

This report, including our conclusions, has been prepared solely for the Board of Directors of HSBC in accordance with the agreement between us, to assist the Directors in reporting HSBC’s sustainability performance and activities. We permit this report to be disclosed at <https://www.hsbc.com/our-approach/esg-information/esg-reporting-and-policies>ⁱ in respect of the 2019 reporting year, to assist the Directors in responding to their governance responsibilities by obtaining an independent assurance report in connection with the Selected Information. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Board of Directors and HSBC for our work or this report except where terms are expressly agreed between us in writing.

PricewaterhouseCoopers LLP
Chartered Accountants
London
18 February 2020

ⁱ The maintenance and integrity of HSBC’s website is the responsibility of the Directors; 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 or Reporting Criteria when presented on HSBC’s website.