

HSBC France

**Amendment to the Universal registration document
and Annual Financial Report 2019**



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Presentation of information

This amendment to the Universal Registration Document was filed on 14 April 2020 with the *Autorité des Marchés Financiers* ('AMF'), as the competent authority under Regulation (EU) n°2017/1129, without prior approval in accordance with Article 9 of that Regulation.

The universal registration document may be used for the purposes of an offer to the public of securities or the admission of securities to trading on a regulated market if supplemented by a securities note and if necessary, a summary and any amendments to the universal registration document. The whole is approved by the AMF according to the regulation (UE) n°2017/1129.



Reference to the Universal Registration Document

This amendment to the Universal Registration Document, refers to the Universal Registration Document 2019 filed with the AMF on 19 February 2020 under reference number D.20-0071.

Cautionary statement regarding forward-looking statements

This amendment to the Universal Registration Document contains certain forward-looking statements with respect to the financial condition, results of operations and business of the group. Statements that are not historical facts, including statements about the group's beliefs and expectations, are forward-looking statements. Words such as 'expects', 'anticipates', 'intends', 'plans', 'believes', 'seeks', 'estimates', 'potential' and 'reasonably possible', variations of these words and similar expressions are intended to identify forward-looking statements.

These statements are based on current plans, estimates and projections, and therefore undue reliance should not be placed on them. Forward-looking statements speak only as of the date they are made. HSBC France makes no commitment to revise or update any forward-looking statements to reflect events or circumstances occurring or existing after the date of any forward-looking statement.

Forward-looking statements involve inherent risks and uncertainties. Readers are cautioned that a number of factors could cause actual results to differ, in some instances materially, from those anticipated or implied in any forward-looking statements.

Disclaimer about translation

The translation in English of the amendment to the Universal Registration Document, filed with the *Autorité des marchés financiers* ('AMF') on 14 April 2020 under reference number D. 20-0071-A01, is an accurate and faithful translation of the French version, with the exception of errors or translation discrepancies that may not constitute significant omissions or inaccuracies within the meaning of Article 212-3 of the AMF General Regulations.

Risks Relating to HSBC France's Business

For information on risks relating to HSBC France's business, you should read the risks described in the 2019 Universal registration document, including the section entitled "Risks" on pages 78 through 150 and Note 33 (Legal proceedings and regulatory matters relating to HSBC group entities generally) to the consolidated financial statements included therein on pages 215 and 216. The information below supplements the "Risks" section of the Universal Registration Document and updates it on the date of filing of this amendment.

Risks relating to the impact of COVID-19

The COVID-19 outbreak has had, and continues to have, a material impact on businesses and on the economic environments in which HSBC France operates. There are a number of factors associated with the outbreak and its impact on economies that could have a material adverse effect on (among other things) the profitability, capital and liquidity of financial institutions such as HSBC France.

The COVID-19 outbreak has caused disruption to HSBC France's customers, suppliers and staff. A number of jurisdictions in which HSBC France operates, notably France, have implemented severe restrictions on the movement of their respective populations, with a resultant significant impact on economic activity in those jurisdictions. These restrictions are being determined by the governments of individual jurisdictions (including through the implementation of emergency powers) and impacts (which depend, inter alia, on the timing of implementation and any subsequent lifting of restrictions) may vary from jurisdiction to jurisdiction. It remains unclear how this will evolve through 2020 and HSBC France continues to monitor the situation closely.

In many of the jurisdictions in which HSBC France operates, notably in France, schemes have been initiated by national governments to provide financial support to parts of the economy most impacted by the COVID-19 outbreak. The details of how these schemes will operate, the impact on HSBC France's customers and therefore the impact on HSBC France itself remains uncertain at this stage. The actions taken by the various governments and central banks, in Europe and notably in France, may indicate a view on the potential severity of downturn and post recovery environment, which from a commercial, regulatory and risk perspective could be significantly different to past crises and persist for a prolonged period. An immediate financial impact in early 2020 will be higher credit impairment charges and Expected Credit Losses ("ECL") driven firstly by the expected rise in non-performing loans generated by increasing company defaults, secondly by a change in the economic scenarios used to calculate ECL. On the latter point, the outbreak has led to a major weakening in gross domestic product ("GDP") in many of the jurisdictions in which HSBC France operates, notably in France, and the probability of a more adverse economic scenario for at least the short term is substantially higher than at 31 December 2019. Under the IFRS 9 approach adopted by HSBC France, GDP is one of the factors that affect the modelling of ECL. The economic scenarios for Europe, and notably France, used to calculate ECL at 31 December 2019 do not, however, reflect the now global impacts of COVID-19.

Should the COVID-19 outbreak continue to cause disruption to economic activity, particularly in Europe, through 2020, there could be adverse impacts on HSBC France's income due to lower lending and transaction volumes and lower wealth and insurance manufacturing revenue, including the present value of in-force long-term insurance business (PVIF), due to bond and equity markets volatility and weakness. In addition, lower interest rates will negatively impact net interest income and extreme market movements could have a negative impact on HSBC France's markets activities. Other potential risks include credit rating migration which could negatively impact HSBC France's risk-weighted assets and capital position, and potential liquidity stress due, among other factors, to increased customer drawdowns, notwithstanding the significant initiatives that

governments and central banks have put in place to support funding and liquidity.

Central bank and government actions and support measures taken in response to the COVID-19 outbreak may meet restrictions in relation to capital. These may limit management's flexibility in managing the business and taking action in relation to capital distribution and capital allocation.

Any and all such events mentioned above could have a material adverse effect on HSBC France's business, financial condition, results of operations, prospects, liquidity, capital position and credit ratings (including potential credit rating agency changes of outlooks or ratings), as well as on HSBC France's customers, employees and suppliers.

Risks Relating to the Notes or Certificates

HSBC France's credit ratings may not reflect all risks of an investment in the Notes or Certificates, and changes to any credit rating assigned to us or the Notes or Certificates may affect the market value of the Notes or Certificates.

HSBC France's credit ratings or those assigned to the Notes or Certificates may not reflect the potential impact of all risks related to structure and other factors on any trading market for, or market value of, the Notes or Certificates, including risks relating to the ongoing COVID-19 outbreak. A credit rating is not a recommendation to buy, sell or hold securities and may be revised or withdrawn by the rating agency at any time in its sole discretion.

Any rating assigned to HSBC France or the Notes or Certificates may be withdrawn entirely by a credit rating agency, may be suspended or may be lowered, if, in that credit rating agency's judgment, circumstances relating to the basis of the rating so warrant. Moreover, the rating agencies that currently, or may in the future, publish a rating for us or the Notes or Certificates may change the methodologies that they use for analysing securities with features similar to the Notes or Certificates. Ratings may be impacted by a number of factors that can change over time, including the credit rating agency's assessment of: (i) HSBC France's strategy and management's capability; (ii) HSBC France's financial condition, including in respect of capital, funding and liquidity; (iii) competitive, economic, legal and regulatory conditions in HSBC France's key markets, including those markets where HSBC France has large exposures or on which HSBC France's operating results, including revenues, are substantially dependent; (iv) the level of political support for the industries in which HSBC France operate; (v) the integration of HSBC France within the HSBC Group; (vi) legal and regulatory frameworks affecting HSBC France's legal structure, business activities and the rights of HSBC France's creditors; and (vii) the impact of the current macroeconomic environment and governmental and regulatory responses arising from the COVID-19 outbreak on any of the foregoing factors.

For example, in December 2019, Fitch downgraded the rating on long-term senior unsecured debt of HSBC Holdings plc, HSBC Bank plc and HSBC France and Moody's changed the outlook on ratings from stable to negative on these entities as well. This reflected the agencies' assessment of HSBC Group's financial strength based on reduced return targets, as well as the planned repositioning of the U.S. and European non-ring-fenced banking units, among other factors. Subsequently in December, Fitch removed the Ratings Watch Negative on the long-term senior unsecured debt, which had related to uncertainty on the outcome of the UK's withdrawal from the EU. This reflected Fitch's view that the short-term risk of a disruptive 'no-deal' withdrawal had reduced. In April 2020, Fitch has announced that it has revised HSBC Holdings plc's, HSBC Bank plc, HSBC France and some other HSBC Group entities' outlook to Negative from Stable, reflecting the economic disruption driven by the COVID-19 outbreak. There can be no assurance that Moody's or any other rating agency will not take additional negative ratings actions as a result of economic uncertainties or other factors in connection with the COVID-19 outbreak.

Real or expected downgrades, suspensions or withdrawals of credit ratings assigned to us or the Notes or Certificates could cause the liquidity or trading prices of the Notes or Certificates to decline significantly. Additionally, any uncertainty about the extent of any anticipated changes to the credit ratings assigned to us or the Notes or Certificates may adversely affect the market value of the Notes or Certificates.

Category	Risks	Probability (Unlikely/Possible/ Likely)	Impact (Low/Moderate/ Significant)
Macroeconomic risk	Current economic and market conditions may adversely affect HSBC France's results.	Likely	Significant
Geopolitical risk	The UK's withdrawal from the European Union may pose operating challenges to HSBC France in its adaptation to the new economic and regulatory environment.	Likely	Moderate
Macro-prudential, regulatory and legal risks	HSBC France is exposed to the risks associated with the replacement of benchmark indices.	Unlikely	Significant
Risks related to our business, business operations, governance and internal control systems	The delivery of our strategic actions is subject to execution risk.	Likely	Significant
	Risks concerning borrower credit quality are inherent in our businesses.	Likely	Significant
	HSBC France is exposed to a risk of attrition along with a skills retention risk.	Likely	Significant
	We may not achieve any of the expected benefits of our strategic initiatives.	Possible	Significant
	HSBC France remain susceptible to a wide range of cyber-risks that impact and/or are facilitated by technology	Possible	Significant
	HSBC France's operations utilise third-party and intra group suppliers and service providers.	Possible	Significant
	HSBC France's operations are highly dependent on our information technology systems.	Unlikely	Significant
	HSBC France's data management policies and processes may not be sufficiently robust.	Unlikely	Significant
	HSBC France's reputational risk is highly linked to its current organisational evolution.	Likely	Moderate
	HSBC France could incur losses or be required to hold additional capital as a result of model limitations or weaknesses.	Likely	Moderate
	Market fluctuations may reduce our income or the value of our portfolios.	Likely	Moderate
	HSBC France's operations are subject to the threat of fraudulent activity.	Likely	Moderate
	HSBC France's financial statements are based in part on judgements, estimates and assumptions that are subject to uncertainty.	Likely	Moderate
	We have significant exposure to counterparty risk.	Possible	Moderate
Liquidity, or ready access to funds, is essential to our businesses.	Unlikely	Moderate	
Third parties may use us as a conduit for illegal activities without our knowledge.	Unlikely	Moderate	

Macroeconomic risk

Current economic and market conditions may adversely affect HSBC France's results. Probability: Likely / Impact: Significant.

Due to its affiliation to a banking group present in significant number of countries, a large part of HSBC France's customer base is composed of international firms or firms having a strong international activity. In a context of stressed trade relations between the US and China and a global rise of protectionist tendencies, a progressive downturn of international trade could not be excluded, which could adversely affect the volume of business along with the financial results of HSBC France.

Furthermore, the low and, even negative rate environment, that prevails in the Euro zone for the past several years generally affects all banks as historically a portion of the revenues were derived from customers' deposits. These rates, close to zero, and, more generally, the monetary easing policy led by the ECB, have also resulted in reducing the volume of fixed income transactions, contributing to an erosion of banking intermediation margins, which were beyond the effect induced by the development of electronic trading platforms.

If the above were to persist durably, and if the HSBC France markets activities diversification along with the re-organisation of its retail bank should not be in line with the plan, the economic and market conditions could represent a particular challenge for the bank, as fixed income activities were the historical bedrock of its "Global Markets" division.

In 2019, the HSBC France Reported Loss before tax was EUR 22 million (Retail Banking and Wealth Management EUR34m, Commercial Banking EUR11m, Global Banking and Markets -EUR8m, Private Banking EUR8m and Corporate centre -EUR67m), down from a EUR 45 million profit in 2018, including a EUR 169 million goodwill impairment. The financial performance was subdued by the persisting historically low interest rates that impacted the net interest margin, despite the growth in the loan and deposit balances resulting from a robust commercial performance. Furthermore, Global Markets performance was low in a competitive environment. These elements were partly offset by the positive contribution from the European branches that displayed a reported profit before tax of EUR 131 million.

Geopolitical risk

The UK's withdrawal from the European Union may pose operating challenges to HSBC France in its adaptation to the new economic and regulatory environment. Probability: Likely / Impact: Moderate.

The UK electorate's vote and the exit agreement to leave the European Union may have a significant impact on general macroeconomic conditions in the United Kingdom, the European Union and globally. Negotiations of the UK's exit agreement, its future relationship with the EU and its trading relationships with the rest of the world have yet to be clarified.

The UK's future relationship with the EU will have implications for the future business model for HSBC's London based European cross-border banking operations, which relies on unrestricted access to the European financial services market (loss of EU 'passporting rights', discontinuation of the free movement of services and significant changes to the UK's immigration policy).

As a result, meeting HSBC clients' needs after the UK's departure from the EU is requiring adjustments to HSBC European crossborder banking operations, including the transfer to HSBC France of several EEA-based HSBC entities to HSBC France (now completed) and the migration of impacted businesses and clients from the UK to its EEA subsidiaries, in particular HSBC France (largely completed).

HSBC France is tackling many challenges (legal, regulatory, organisational, operational, IT-related, HR-related, financial) as part of its adaptation programme to the post-Brexit environment. These challenges are addressed as the project is being implemented.

See also pages 8 & 9 of the HSBC France Universal registration document - Impact of UK's withdrawal from the European Union on HSBC France and page 79 - Areas of Special Interest - Brexit risk – Process of UK withdrawal from the European Union. Over 900 corporate clients of HSBC Bank plc have started banking with HSBC France in 2019 as a consequence of Brexit.

Macro-prudential, regulatory and legal risks

HSBC France is exposed to the risks associated with the replacement of benchmark indications. Probability: Unlikely / Impact: Significant.

The expected replacement of key benchmark rates (LIBOR / EONIA / EURIBOR) with alternative benchmark rates introduces a number of risks for HSBC France, its clients, and the financial services industry more widely. This includes, but is not limited to:

- Legal risks, as changes required to documentation for new and existing transactions may be required;
- Financial risks, arising from any changes in the valuation of financial instruments linked to benchmark rates;
- Pricing risks, such as changes to benchmark indexes could impact pricing mechanisms on some instruments;
- Operational risks, due to the potential requirement to adapt IT systems, trade reporting infrastructure and operational processes; and
- Conduct risks, relating to communication with potential impact on customers, and engagement during the transition period.

There remains uncertainty regarding transition mechanisms and the relative levels of replacement indices and methodologies. Accordingly, it is not currently possible to determine to what extent such changes would affect HSBC France. However, the implementation of alternative benchmark rates may have a material adverse effect on our financial condition, customers and operations.

See also pages 79 and 80 of the HSBC France Universal registration document - Areas of Special Interest – Ibor transition.

Risks related to our business, business operations, governance and internal control systems

The delivery of our strategic actions is subject to execution risk. **Probability: Likely / Impact: Significant.**

Robust management of critical time-sensitive and resource intensive projects is required to effectively deliver HSBC France's strategic priorities. HSBC France continues to implement a number of programmes in addition to the already mentioned project related to the UK's departure (RBWM New Distribution Model and Regulatory Programmes) and the magnitude and complexity of the projects present heightened execution risk. The cumulative impact of the collective change initiatives underway within HSBC France is significant and has direct implications on HSBC France's resourcing and people. In addition, the completion of these strategic actions is subject to uncertain economic, market and regulatory context, inducing volatility in financial results and necessary adaptation of strategy execution to take new environment into account.

The failure to successfully deliver key strategic actions or other regulatory programmes could have a significant impact on HSBC France's financial condition, profitability and prospects, as well as wider reputational and regulatory implications. Execution Risk linked to the ongoing number of projects is being managed and mitigated through a Project Oversight Committee.

Risks concerning borrower credit quality are inherent in our businesses. **Probability: Likely / Impact: Significant.**

Risks arising from changes in credit quality and the recoverability of loans and amounts due from borrowers and counterparties in derivative transactions are inherent in the businesses of HSBC France. Adverse changes in the credit quality of our borrowers and counterparties arising from a general deterioration in economic conditions or systemic risks in the financial systems could reduce the recoverability and value of our assets, and require an increase in our loan impairment charges. The risk is that we fail to estimate accurately the effect of factors that we identify or fail to identify relevant factors. Further, the information HSBC France use to assess the creditworthiness of our counterparties may be inaccurate or incorrect. Any failure by HSBC France to accurately estimate the ability of our counterparties to meet their obligations may have a material adverse effect on HSBC France its prospects, financial condition and results of operations. The level of any material adverse effect will depend of the number of borrowers involved, the size of the exposures and the level of any inaccuracy of our estimations.

Change in expected credit losses and other credit impairment charges in 2019 was -EUR128 million versus a EUR 10 million credit in 2018. The variation was mainly explained by increased provision in Global Banking and Markets and Commercial Banking, while cost of risk remained low on Retail Banking and Wealth Management.

As at 31 December 2019, the Credit Risk RWAs were EUR36.425bn representing 75.8% of total RWAs and Stage 3 impaired loans were EUR1.239bn representing 1.92% of total Gross loans. 94.1% of Loans and advances to customers held at amortised cost are classified as satisfactory or better.

Based on the country of residence of the counterparty, 71.1% of credit risk exposure was in France with a further 19.2% in the rest of Europe. 53.8% of the exposure was on an IRB advanced approach with a 39.4% on a standardized approach. The three largest industry exposures by credit risk were Financial and Insurance, Personal & Administrative services with 37.9%, 20.2% and 10.9% respectively and which together represented 69% of total credit risk exposures. The geographic breakdown of exposures of HSBC France and the credit risk exposures by industry sectors can be found in tables 14 and 15 on pages 18 and 19 & 20 respectively in the 2019 HSBC France Pillar 3 document.

HSBC France is exposed to a risk of attrition along with a skills retention risk. **Probability: Likely / Impact: Significant.**

The demands being placed on the human resources of the bank remain at a very high level. The workload arising from evolving regulatory reform programs places increasingly complex and conflicting demands on the workforce. At the same time, the human resources operate in an employment market where expertise in key markets is often in short supply and mobile. The continued success of HSBC France depends in part on the retention of key members of its management team and wider employee base. The ability to continue to attract, train, motivate and retain highly qualified professionals and talented people who embrace HSBC core values is a key element of our strategy. The successful implementation of our growth strategy depends on the availability of skilled management in each of our businesses and functions, which may depend on factors beyond our control, including economic, market and regulatory conditions.

If businesses or functions fail to staff their operations appropriately or lose one or more of their key senior executives/talent and fail to successfully replace them in a satisfactory and timely manner, or fail to implement successfully the organizational changes required to support the strategy, or fail to develop shared core values, our business prospects, financial condition and results of operations, including control and operational risks, could be materially adversely affected.

As at 31 December 2019, HSBC France had 7,472 full time equivalent employees in France and 1,385 in satellite sites. Of these 130 were considered as CRD IV Material Risk Takers (108 in France & 22 in satellite sites), 43 in accordance with AIFM Directive (Including 3 Executive managers who are already in the CRD IV material risk takers) and 18 in accordance with Solvency II Directive (Including 11 Executive managers who are already in the CRD IV material risk takers). Concerning gender equality, HSBC Group has set itself clear and transparent targets for the proportion of women in senior executive positions. The targets have two end dates: 30 per cent of senior executives to be women by 2020, rising to 35 per cent by 2025. HSBC France is well on track to meet these goals. At the end of 2019, women held 29 per cent of these posts. During 2019, there were 11% hirings in HSBC France versus total FTE's (851 in France & 106 in satellite sites) and 263 promotions of which 57.9% were women. The proportion of the employees over 50 years old HSBC in France + Satellites Sites (FTE) stood at 28.8% as at 31 December 2019 and has been virtually stable over the period 2017 – 2019 whilst the proportion of employees less than 30 years old HSBC in France + Satellites Sites (FTE) has increased from 9.4% in 2017 to 10.8% in 2019.

People risks would likely increase during a prolonged period of "working from home".

We may not achieve any of the expected benefits of our strategic initiatives. Probability: Possible / Impact: Significant.

HSBC Group's strategy is built around two trends: the continued growth of international trade and capital flows, and wealth creation. With regards to the current operating environment in Europe, the HSBC Group is reviewing its strategy and operations in order to implement a sustainable and profitable operating model that would be able to best serve its clients in the future. Within the framework, HSBC France's strategic vision is to be the leading international wholesale bank in Continental Europe. The HSBC Group's international network and expertise along with HSBC France's coverage and capabilities across Continental Europe provide us with a strategic advantage to help clients achieve their goals, whether it is growing their businesses in the single market or breaking into international markets. The development and implementation of HSBC France's strategy requires difficult, subjective and complex judgments, including forecasts of economic conditions in France but also in various parts of the world. HSBC France may fail to correctly identify the trends it seeks to exploit and the relevant factors in making decisions as to capital deployment and cost reduction.

Key to achieving HSBC France's growth strategy is to fully embed HSBC France's Continental Europe positioning by increasing the cross-business and cross-border synergies between HSBC Group's different entities in the world, while conducting efficiency measures across Continental Europe's entities.

HSBC France's ability to execute its strategy may be limited by its operational capacity and the increasing complexity of the regulatory environment in which HSBC France operates. HSBC France continues with cost management initiatives.

HSBC France remains susceptible to a wide range of cyber-risks that impact and/or are facilitated by technology. Probability: Possible / Impact: Significant.

The threat from cyber-attacks remains a concern for our organisation, and failure to protect our operations from internet crime or cyber-attacks may result in financial loss, business disruption and/or loss of customer services and data or other sensitive information that could undermine our reputation and our ability to attract and keep customers. Ransomware and Distributed Denial of Service ('DDOS') attacks are an increasingly dominant threat across the industry. In 2019, the bank was subject to a small number of DDOS attacks on our external facing websites across the Group and no ransomware attacks. Although cyberattacks had a negligible effect on our customers or services due to the increasing sophistication of cyber-attacks potential future attacks could have a material adverse effect on our business, prospects, our capital, reputation and our profit.

HSBC France did not reported any significant security incidents in the past 12 months and had no operational losses related to Cyber risks in either 2018 or 2019. Operational losses for combined Information, technology and cyber security risks were EUR1.22m in 2019 (of which zero related to cyber risks) and over the period 2011 – 2019 they represented a modest 0.92% of total operational risk losses for HSBC France. For Cyber risks, the operational risk losses over the period did not exceed 0.18% of the total operational risk losses for HSBC France for the same period. See table on page 132 of the HSBC France Universal registration document concerning Operational risk losses: quantitative data starting from 2011 for full details.

Cyber risks would likely increase during a prolonged period of "working from home".

HSBC France's operations utilise third-party and intra group suppliers and service providers. Probability: Possible / Impact: Significant.

HSBC relies on external and intra-group third parties to supply goods and services. Regulators have increased their scrutiny regarding the use of third-party providers by financial institutions, including the ones related to outsourcing decisions and how key relationships are managed. Risks arising from the use of thirdparties may be more challenging to manage.

The inadequate management of third-party risk could impact our ability to meet strategic, regulatory and client expectations. This may lead to consequences, including regulatory or civil penalties or damage both to shareholder value and to our reputation, which could have a negative impact on our business, clients, capital and profit. To answer regulatory evolutions related to the implementation of new European Banking Authority guidelines on outsourcing, HSBC France enhanced in 2019 its third party risk management framework in order to deal with those risks in a consistent and efficient way within its perimeter. This new framework, applicable within the whole perimeter of HSBC France, is currently being deployed and still needs support from the businesses. Furthermore, remediation works related to preexisting third-parties are being deployed.

Any outsourcing of a material service needs to be formally approved by the Bank Risk Management Meeting.

HSBC France's operations are highly dependent on our information technology systems. Probability: Unlikely / Impact: Significant.

The reliability and security of our information and technology infrastructure, and our customer databases are crucial to maintaining the service availability of banking applications and processes and to protecting the HSBC brand. The proper functioning of our payment systems, financial control, risk management, credit analysis and reporting, accounting, customer service and other information technology systems, as well as the communication networks between our branches and main data processing centres, are critical to our operations.

Critical system failure, any prolonged loss of service availability or any material breach of data security, particularly involving confidential customer data, could cause serious damage to our ability to service our clients, could breach regulations under which we operate and cause long-term damage to our business and brand that could have a material adverse effect on our business, prospects, financial condition and results of operations. No noticeable incidents or disruptions were reported for HSBC France in 2019. In addition HSBC France management considered the financial control environment and reviewed action taken to enhance controls over IT access management.

Operational losses for Information, technology and cyber security risk in 2019 were EUR1.22m and over the period 2011 – 2019 they represented a modest 0.92% of total operational risk losses for HSBC France. Losses occurred only in 2012, 2013 and 2019 during this period.

There were no operational losses for Systems and data integrity events in 2019 and over the period 2011 – 2019 they represented 2.7% of total operational risk losses for HSBC France.

See table on page 132 of the HSBC France Universal registration document concerning Operational risk losses: quantitative data starting from 2011 for full details.

HSBC France's data management policies and processes may not be sufficiently robust. Probability: Unlikely / Impact: Significant.

Critical business processes rely on large volumes of data from a number of different systems and sources. If data governance including retention and deletion, data quality and data architecture policies and procedures are not sufficiently robust, manual intervention, adjustments and reconciliations may be required to reduce the risk of error in reporting to senior management or regulators. Inadequate policies and processes may also affect our ability to use data within HSBC France to service customers more effectively and/or improve our product offering. This could have a material adverse effect on our business, prospects, financial condition and results of operations. Moreover, financial institutions that fail to comply with the principles for effective risk data aggregation and risk reporting as set out by the Basel Committee by the required deadline may face supervisory measures. In addition, failure to comply with new Global Data Privacy Requirements may result in regulatory sanctions. Any of these failures could have a material adverse effect on our business, prospects, financial condition and results of operations.

HSBC France's reputational risk is highly linked to its current organisational evolution. Probability: Likely / Impact: Moderate.

Reputational risk has significantly increased in the context of HBFR business model reshaping: The path of transformation and the intense activity linked to an important number of strategic projects concurrently managed have attracted media pick up, most notably the Group's strategic review of retail operations in France, which could affect directly HSBC France, financially or not, along with partners and clients' trust. Simultaneously the level of uncertainty has increased for both customers and employees and our ability to hire or retain may be impacted by a long lasting period of lack of visibility on businesses and operations moving forward.

Negative public opinion may adversely affect our ability to retain and attract customers, in particular, corporate and retail depositors, and retain and motivate staff, and could have a material adverse effect on our business, prospects, financial condition, reputation and results of operations.

HSBC France could incur losses or be required to hold additional capital as a result of model limitations or weaknesses. Probability: Likely / Impact: Moderate.

HSBC France uses models for a range of purposes in managing its business, including calculation of risk-weighted assets, loan impairment charges, fair valuation of some financial instruments, financial crime and fraud risk management, stress testing, and credit approvals. HSBC France could in some cases face adverse consequences as a result of decisions by management based on the use of models. This can happen when models have been inadequately designed or implemented, when their outcome is misunderstood or used beyond the model's intended use case, or as a result of random events whose probability was neglected in the model design.

Risks arising from the use of models could have a material adverse effect on our business, prospects, financial condition, results of operations, minimum capital requirements and reputation.

Regulatory scrutiny and supervisory concerns over banks' use of models is considerable, particularly the internal models and assumptions used by banks in the calculation of risk weighted assets. In case of significant model deficiencies, regulators may require model re-developments or impose capital add-ons. For information purposes, Risk Weighted Assets as of 31 December 2019 included EUR 36.425 billion in Credit Risk, EUR 3.983 billion in Counterparty Credit Risk, EUR 3.149 billion in Operational Risk, and EUR 4.494 billion in Market Risk (cf. 2019 HSBC France Universal registration document page 154) – these numbers are for a large part computed using internal models.

Likewise, models are used to infer the fair value of some financial instruments, such as over-the-counter derivatives, whose price cannot be directly observed on trading platforms: models then compute a fair value by leveraging the prices of similar observable financial instruments. They may be based on observable inputs only ("Level 2" fair value accounting) or, in some cases, on some unobservable inputs that have to be prudently estimated ("Level 3" fair value accounting). For information purposes, as of 31 December 2019, assets valued under Level 2 techniques amounted to EUR 31 billion, and liabilities to EUR 39 billion; assets valued under Level 3 techniques amounted to EUR1 billion, and liabilities to EUR 437 million (cf. 2019 HSBC France Universal registration document, note 12 of the consolidated financial statements, page 185).

Market fluctuations may reduce our income or the value of our portfolios. Probability: Likely / Impact: Moderate.

Our businesses are inherently subject to risks in financial markets and in the wider economy, including changes in, and increased volatility of, interest rates, inflation rates, credit spreads, foreign exchange rates, commodity, equity, bond and property prices, and the risk that our customers act in a manner inconsistent with our business, pricing and hedging assumptions.

Market movements will continue to significantly affect us in a number of key areas. For example, banking and trading activities are subject to interest rate risk, foreign exchange risk, inflation risk and credit spread risk. Changes in interest rate levels, interbank spreads over official rates, yield curves and spreads affect the interest rate spread realized between lending and borrowing costs.

Competitive pressures on fixed rates or product terms in existing loans and deposits sometimes restrict our ability to change interest rates applying to customers in response to changes in official and wholesale market rates.

Our insurance businesses are also exposed to the risk that market fluctuations will cause mismatches to occur between product liabilities and the investment assets that back them. It is difficult to predict with any degree of accuracy changes in market conditions, and such changes may have a material adverse effect on our business, prospects, financial condition and results of operations.

As at 31 December 2019, Market Risk RWAs were EUR4.494bn of which EUR325m were under standardized approach and EUR4.169bn under IMA. The standardized RWAs include EUR128m of Interest rate risk, EUR127m of Foreign exchange risk and EUR70m of options. RWAs under IMA include EUR704m VaR RWAs, EUR1.667bn Stressed VaR RWAs, EUR891m of Incremental risk charge RWAs and EUR907m re Others.

HSBC France's operations are subject to the threat of fraudulent activity. Probability: Likely / Impact: Moderate.

The risk of fraud has increased and been made more complex by the digital transformations operated within HSBC, fraudsters may target any of our products, services and delivery channels (especially the online on-boarding), including lending, internet banking, payments, bank accounts and cards, and cyber attacks against the bank's infrastructure are increasing in frequency and force. This may result in financial loss to HSBC France, an adverse customer experience, reputational damage and potential regulatory action depending on the circumstances of the event, any of which could have a material adverse effect on our business, prospects, financial condition and results of operations. There is consumer association pressure to make banks liable for substantially more of consumer fraud losses in absence of comprehensive fraud prevention solutions and controls. In addition, fraud related litigation against the bank is increasing, be it where HSBC is banking the client or the fraudster.

In 2019, Operational Risk losses totaled EUR15.08m of which EUR2.48m were for external fraud and compares to EUR17.4m in total in 2018 of which EUR2.4m for external fraud. Internal fraud were negligible or zero in 2018 and 2019.

See table on page 132 of the HSBC France Universal registration document concerning Operational risk losses: quantitative data starting from 2011 for full details.

The risk of fraud would likely increase during a prolonged period of "working from home".

HSBC France's financial statements are based in part on judgements, estimates and assumptions that are subject to uncertainty. Probability: Likely / Impact: Moderate.

The preparation of financial statements requires management to make judgements, estimates and assumptions that affect the reported amounts of assets, liabilities, income and expenses. Due to the inherent uncertainty in making estimates, particularly those involving the use of complex models, actual results reported in future periods may be based upon amounts which differ from those estimates. Estimates, judgements, assumptions and models are continually evaluated, and are based on historical experience and other factors, including expectations of future events that are believed to be reasonable under the circumstances. Revisions to accounting estimates are recognised in the period in which the estimate is revised and in any future periods affected. The accounting policies deemed critical to our results and financial position, based upon materiality and significant judgements and estimates, include impairment of loans and advances, goodwill impairment, valuation of financial instruments, deferred tax assets, provisions and interests in associates. The valuation of financial instruments measured at fair value can be subjective, in particular where models are used that include unobservable inputs. Given the uncertainty and subjectivity associated with valuing such instruments, future outcomes may differ materially from those assumed using information available at the reporting date. The effect of these differences on the future results of operations and the future financial position of HSBC France may be material. If the judgement, estimates and assumptions HSBC France use in preparing its consolidated financial statements are subsequently found to be materially different from those assumed using information available at the reporting date, this could affect our business, prospects, financial condition and results of operations.

We have significant exposure to counterparty risk. Probability: Possible / Impact: Moderate.

HSBC France are exposed to counterparties that are involved in virtually all major industries, and we routinely execute transactions with counterparties in financial services, including central clearing counterparties, commercial banks, investment banks, mutual funds, and other institutional clients. Many of these transactions expose HSBC France to credit risk in the event of default by our counterparty or client. Our ability to engage in routine transactions to fund our operations and manage our risks could be materially adversely affected by the actions and commercial soundness of other financial services institutions. Financial institutions are necessarily interdependent because of trading, clearing, counterparty or other relationships. As a consequence, a default by, or decline in market confidence in, individual institutions, or anxiety about the financial services industry generally, can lead to further individual and/or system difficulties, defaults and losses.

Mandatory central clearing of OTC derivatives, including under the EU's European Market Infrastructure Regulation, poses risks to HSBC. As a clearing member, we will be required to underwrite losses incurred at a Central Counterparty ("CCP") by the default of other clearing members and their clients. Hence, increased moves towards central clearing brings with it a further element of interconnectedness between clearing members and clients that we believe may increase rather than reduce our exposure to systemic risk. At the same time, our ability to manage such risk ourselves will be reduced because control has been largely outsourced to CCPs.

Where bilateral counterparty risk has been mitigated by taking collateral, credit risk for HSBC France may remain high if the collateral we hold cannot be realised or has to be liquidated at prices that are insufficient to recover the full amount of our loan or derivative exposure. There is a risk that collateral cannot be realised, including situations where this arises by change of law that may influence our ability to foreclose on collateral or otherwise enforce contractual rights.

Any such adjustments or fair value changes may have a material adverse effect on our financial condition and results of operations.

As at 31 December 2019, Counterparty Risk RWAs were EUR 3.983bn of which EUR955m were on IRB advanced approach (92% institutions), EUR 1.478bn on IRB foundation approach (100% corporates), EUR506m standardized (81% institutions), EUR571m CVA advanced, EUR314m CVA standardized and EUR159m CCP standardized. 68% of Counterparty Risk RWAs are derivatives (OTC and exchange-traded derivatives) related. See table: Counterparty credit risk – RWAs by exposure class and product on page 119 of the HSBC France Universal registration document for further details. Details concerning IRB and Standardised exposure - credit risk mitigation can be found in tables 21 and 22 on pages 27 and Page 28 respectively in the HSBC France Pillar 3 document.

Liquidity, or ready access to funds, is essential to our businesses. Probability: Unlikely / Impact: Moderate.

Our ability to borrow on a secured or unsecured basis, and the cost of doing so, can be affected by increases in interest rates or credit spreads, the availability of credit, regulatory requirements relating to liquidity or the market perceptions of risk relating to the wider HSBC Group, HSBC France specifically or the banking sector.

Current accounts and savings deposits payable on demand or at short notice form a significant part of our funding, and we place considerable importance on maintaining their stability. For deposits, stability depends upon preserving investor confidence in our capital strength and liquidity, and on comparable and transparent pricing. Although deposits have been a stable source of funding historically, this may not continue.

We also access wholesale markets in order to provide funding to align asset and liability maturities and currencies.

Unfavourable macroeconomic developments, market disruptions or regulatory developments may increase our funding costs or challenge the ability of HSBC France to raise funds to support or expand its businesses.

If we are unable to raise funds through deposits and/or in the capital markets, our liquidity position could be adversely affected, and we might be unable to meet deposit withdrawals on demand or at their contractual maturity, to repay borrowings as they mature, to meet our obligations under committed financing facilities and insurance contracts or to fund new loans, investments and businesses. We may need to liquidate unencumbered assets to meet our liabilities. In a time of reduced liquidity, we may be unable to sell some of our assets, or we may need to sell assets at reduced prices, which in either case could materially adversely affect our business, prospects, financial condition and results of operations. It is difficult to predict with any degree of accuracy changes in access to funds, and such changes may have a material adverse effect on our business, prospects, financial condition and results of operations.

Nevertheless, number of contingent actions and procedures – including business actions - are in place in HSBC France's Contingency Funding Plan in order to tackle such a situation should it happen, which materially reduces the impact of this risk should it materialise.

The short-term ratio (liquidity coverage ratio or LCR), calculated according to the European Commission Delegated regulation (EU 2015/61), was 152 per cent as opposed to the regulatory minimum figure of 100 per cent, and the long-term ratio (net stable funding ratio or NSFR), calculated according to the text of BCBS 295, was 117 per cent. HSBC France, like the HSBC group, calculates NSFR in line with Basel Committee on Banking Supervision's publication number 295 ('BCBS295'). This calculation requires various interpretations of the text, and therefore HSBC France's NSFR may not be directly comparable with the ratios of other institutions. Nevertheless, based on Regulation EU 2019/876 which will enter into force in June 2021, the NSFR is estimated at the level of 127 per cent as at end 2019.

HSBC France undertakes liquidity stress testing to confirm that its risk appetite is correct, to validate that it can continue to operate under various stress scenarios and to confirm that the stress assumptions within the LCR scenario are appropriate and conservative enough for the group's business. HSBC France also conducts reverse stress testing with the specific aim of reviewing the remoteness of the scenarios that would lead the bank to exhaust its liquidity resources. If the scenarios are not deemed remote enough then corrective action is taken. Several different stress testing scenarios are run that test the quality of liquidity resources under stresses of varying durations and nature. The ALCO approves the underlying assumptions and reviews results. These results are also presented through the Internal Liquidity Adequacy Assessment Process ('ILAAP') to the Board.

Third parties may use us as a conduit for illegal activities without our knowledge. Probability: Unlikely / Impact: Moderate.

We are required to comply with applicable AML laws, Sanctions, AB&C, Fraud Prevention and Tax Transparency regulations, and have adopted HSBC Group policies and procedures, as well as additional local legislative and regulatory requirements, including Customer Due Diligence procedures and internal control framework and governance, aimed at preventing use of HSBC products and services for the purpose of committing or concealing financial crime and at mitigating HSBC exposition to Financial Crime risks.

A major focus of US and UK government policy relating to financial institutions in recent years has been preventing, detecting and deterring money laundering and enforcing compliance with US and EU economic sanctions at Group level. This focus is reflected in part by our agreements with US and UK authorities relating to various investigations regarding past inadequate compliance with AML, and sanctions. These consent orders do not preclude additional enforcement actions by bank regulatory, governmental or law enforcement agencies or private litigation.

Our local French regulators remain strongly focused on AML-CTF and, more recently, AB&C and Tax Fraud/Tax Evasion matters within the French Banking industry. Furthermore, French anticorruption requirements have been issued through the loi n°2016-1691 du 9 décembre 2016 said « Sapin II ». In addition to this, the 'Agence Française Anticorruption' ('AFA') have been established to supervise French companies.

A number of the remedial actions have been taken as a result of the matters to which the US Deferred Prosecution Agreement ('DPA') related, which are intended to ensure that the Group's businesses are better protected in respect of these risks. As HSBC have met their obligations under the DPA, the agreement has expired at the end of 2017. The Monitor overseeing HSBC progress under the DPA has also been serving since July 2013 as HSBC's Skilled Person under a 2012 Direction issued by the UK Financial Conduct Authority and will continue in that capacity for a period of time at the FCA's discretion.

In recent years, we have experienced a substantial rise in the volume of new regulation impacting our operational processes, along with increasing levels of compliance risk as regulators and other authorities pursued reviews and investigations into the bank's activities. It is important to note that France on-site visit and plenary discussions for a mutual evaluation is scheduled by FATF in 2020. In line with the Group's heightened standards and organisation, HSBC France has continued to improve the Financial Crime Compliance and Regulatory Compliance framework. However, there can be no assurance that these will be completely effective.

Moreover, in relevant situations, and where permitted by regulation, we may rely upon certain third parties to carry out certain ID&V and KYC activities in accordance with our AML, Sanctions, AB&C, Fraud Prevention and Tax Transparency procedures. While permitted by regulation, such reliance may not be effective in preventing third parties from using us (and our relevant counterparties) as a conduit for money laundering, including illegal cash operations, without our knowledge (and that of our relevant counterparties) or for financing terrorism, sanctions violation, corruption, fraud or tax fraud and tax evasion. Becoming a party to money laundering, association with, or even accusations of being associated with, money laundering, sanctions violation, corruption fraud or tax fraud/evasion will damage our reputation and could make us subject to fines, sanctions and/or legal enforcement. Any one of these outcomes could have a material adverse effect on our business, prospects, financial condition and results of operations.

Within HSBC France, every month, all transactions – more than 30 million across 1.7 million accounts – are analysed to detect signs of money laundering, tax avoidance and failure to comply with sanctions. In addition, 1.7 million names are screened on an ongoing basis using various surveillance lists. To ensure that our policies are effective, an annual training course has been updated and is taken by 98 per cent of HSBC France employees, which is in line with the bank's Risk Appetite of having at least 96 percent mandatory training completion rate (the Risk Tolerance is set at 97 per cent). As at 31 December 2019, the Financial Crime Compliance ('FCC') function had 59.6 full-time equivalent employees in France; with an additional, 42.8 Full Time Equivalent employees in the FCC departments in the ten EEA branches of HSBC France.

Information on HSBC France

Documents and information on display

Any person requiring additional information on the HSBC France group may, without commitment, request documents by mail from:

HSBC France – 103 avenue des Champs-Élysées, 75419 Paris Cedex 08, France.

This document is available on the HSBC France group's website (www.hsbc.fr) and on the AMF's website (www.amf-france.org).

Significant changes

With the exception of the elements mentioned in the Amendment to the 2019 Universal Registration Document, including the impact that the health crisis resulting from the coronavirus (COVID-19) could have, no significant adverse change in the outlook for the issuer and no significant change in the group's financial situation or financial performance has not occurred since the end of the last financial year for which audited financial statements have been published and in particular since the signing of the statutory auditors' report on the consolidated financial statements at 19 February 2020.

Persons responsible of the Universal Registration Document and its amendments

Person responsible for the Universal Registration Document and its amendments

Mr Jean Beunardeau, Chief Executive Officer

Statement by the person responsible for the Universal Registration Document and its amendments

I declare, after taking all reasonable measures for this purpose and to the best of my knowledge, that the information contained in this amendment to the Universal Registration Document is in accordance with the facts and that it makes no omission likely to affect its meaning.

Paris, 10 April 2020

Jean Beunardeau, CEO

Cross-reference table

The following cross-reference table refers to the main headings of the 2019/980 delegated regulation supplementing the 2017/1129 regulation (Annex I and Annex II) implementing the directive known as 'Prospectus' and to the pages of the 2019 Universal Registration Document D.20-0071.

Sections of Annex I of the 2019/980 delegated regulation		Pages in this amendment to the 2019 Universal Registration Document	Pages in the 2019 Universal Registration Document filed with the AMF on 19 February 2020
1	Persons responsible, third party information, experts' reports and competent authority approval		
1.1 & 1.2	Persons responsible	page 13	page 268
1.3	Experts' reports	N/A	N/A
1.4	Third party information	N/A	N/A
1.5	Competent authority approval	N/A	N/A
2	Statutory auditors	N/A	page 269
3	Risk factors	pages 3 to 11	pages 78 to 150
4	Information about the issuer	N/A	page 265
5	Business overview		
5.1	Principal activities	N/A	pages 4, 9 to 19 and 229
5.2	Principal markets	N/A	pages 4, 9 to 19 and 229
5.3	Important events	N/A	pages 172 to 173, 229 to 230
5.4	Strategy and objectives	N/A	pages 4 to 9
5.5	Potential dependence	N/A	N/A
5.6	Founding elements of any statement by the issuer concerning its position	N/A	pages 4 and 19
5.7	Investments	N/A	pages 218 to 221, 259 to 262, 272 to 273
6	Organisational structure		
6.1	Brief description of the group	N/A	pages 3 to 20, 252 and 259 to 262
6.2	Issuer's relationship with other group entities	N/A	pages 259 to 261
7	Operating and financial review		
7.1	Financial condition	N/A	pages 156, 158, 227 to 228
7.2	Operating results	N/A	pages 12 to 19, 156 and 227
8	Capital resources		
8.1	Issuer's capital resources	N/A	pages 160 and 243
8.2	Sources and amounts of the issuer's cash flows	N/A	page 159
8.3	Borrowing requirements and funding structure	N/A	pages 78, 119 to 121, 151
8.4	Information regarding any restrictions on the use of capital resources that have materially affected, or could materially affect the issuer's operations	N/A	N/A
8.5	Sources of funds needed	N/A	N/A
9	Regulatory environment	N/A	pages 11 and 151
10	Trend information	N/A	pages 5, 8 and 9
11	Profit forecasts or estimates	N/A	N/A
12	Administrative, management and supervisory bodies and senior management		
12.1	Administrative and management bodies	N/A	pages 22 to 29
12.2	Administrative and management bodies conflicts of interests	N/A	page 38
13	Remuneration and benefits		
13.1	Amount of remuneration paid and benefits in kind granted	N/A	pages 39 to 49, 176 to 180
13.2	Total amounts set aside or accrued by the issuer or its subsidiaries to provide for pension, retirement or similar benefits	N/A	pages 39 to 49, 176 to 180, 244 to 245
14	Board practices		
14.1	Date of expiration of the current term of office	N/A	pages 22 to 29
14.2	Information about members of the administrative, management or supervisory bodies' service contracts	N/A	N/A
14.3	Information about the issuer's audit committee and remuneration committee	N/A	pages 32 to 33, 36
14.4	Corporate governance regime	N/A	page 22
14.5	Potential material impacts on the corporate governance	N/A	N/A
15	Employees		
15.1	Number of employees	N/A	page 177
15.2	Shareholdings and stock options	N/A	page 44
15.3	Arrangements involving the employees in the capital of the issuer	N/A	N/A
16	Major shareholders		
16.1	Shareholders holding more than 5 per cent of the share capital or voting rights	N/A	pages 265 to 267
16.2	Different voting rights	N/A	pages 265
16.3	Control of the issuer	N/A	pages 22 to 23, 269
16.4	Arrangements, known to the issuer, which may at a subsequent date result in a change in control of the issuer	N/A	N/A
17	Related party transactions	N/A	page 50 to 52, 216 to 217, 218 to 221, 252 to 253

18	Financial information concerning the issuer's assets and liabilities, financial position and profits and losses		
18.1	Historical financial information	N/A	pages 19, 155 to 221, 226 to 253, 271
18.2	Interim and other financial information	N/A	N/A
18.3	Auditing of historical annual financial information	N/A	pages 222 to 225 and 254 to 256
18.4	Pro forma financial information	N/A	N/A
18.5	Dividend policy	N/A	pages 183 and 267
18.6	Legal and arbitration proceedings	N/A	pages 137 to 138, 215 to 216, 250 to 251
18.7	Significant change in the issuer's financial position	page 12	pages 19, 218 and 251
19	Additional information		
19.1	Share capital	N/A	pages 213, 243 and 267
19.2	Memorandum and Articles of Association	N/A	pages 265 to 267
20	Material contracts	N/A	page 266
21	Documents available	page 12	page 265

Sections of Annex II of the 2019/980 delegated regulation		Pages in this amendment to the 2019 Universal Registration Document	Pages in the 2019 Universal Registration Document filed with the AMF on 19 February 2020
1	Information to be disclosed about the issuer	page 2	page 2

The following elements are included by reference:

- the consolidated financial statements for the year ended 31 December 2017 and the Statutory Auditors' report on those consolidated financial statements, presented on pages 126 to 187 and 188 to 193 of the reference document D.18-0068 filed with the AMF on 22 February 2018; the information can be found here : <https://www.hsbc.com/-/files/hsbc/investors/investing-in-hsbc/all-reporting/subsidiaries/2017/annual-results/hsbc-france/180222-hbfr-ara-2017-fr.pdf>
- the consolidated financial statements for the year ended 31 December 2018 and the Statutory Auditors' report on those consolidated financial statements, presented on pages 146 to 219 and 220 to 224 of the reference document D.19-0065 filed with the AMF on 20 February 2019; the information can be found here : <https://www.hsbc.com/-/files/hsbc/investors/investing-in-hsbc/all-reporting/subsidiaries/2017/annual-results/hsbc-france/190220-hbfr-ara-2018-fr.pdf>

The 2019 Registration Document includes the annual financial report:	Pages in this amendment to the 2019 Universal Registration Document	Pages in the 2019 Universal Registration Document filed with the AMF on 19 February 2020
Parent company financial statements	N/A	pages 226 to 253
Consolidated financial statements	N/A	pages 155 to 221
Management report Refer to the Management report cross ref table Statement by person responsible	N/A	pages 271 and 268
Statutory Auditors' report	N/A	pages 222 to 225 and 254 to 256
Cross table on Management report:		
Analyses of the activity, results and financial situation	N/A	pages 4 to 20 and 229
Risk factors	pages 3 to 11	pages 78 to 150
Capital and Leverage Management	N/A	pages 151 to 154
Authorities to increase the share capital	N/A	page 267
Corporate, social and environmental responsibility	N/A	pages 53 to 77
Corporate governance report	N/A	pages 21 to 49
Remuneration policy compensation and other advantages to the executive Director	N/A	pages 39 to 49
Mandates and functions of the Executive Directors	N/A	pages 22 to 29
Activities of the subsidiaries and Investment policy	N/A	pages 218 to 221 and 259 to 262
Five year highlights	N/A	pages 19 and 257
Information on supplier payable amounts schedule	N/A	page 20
Other legal documents relating to the Annual General Meeting to be held on 13 March 2020	N/A	pages 263 to 264
Information on HSBC France and its share capital	N/A	pages 265 to 267

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