

HSBC statement on whistleblowing arrangements

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Introduction

HSBC is committed to protecting and supporting employees to speak up so that concerns or issues can be escalated and dealt with effectively, in the interests of HSBC, its employees, shareholders, and other stakeholders.

HSBC Confidential provides employees with a safe, simple, and globally consistent way to raise concerns when normal channels for escalation are unavailable or inappropriate. This is commonly referred to as 'whistleblowing'. HSBC is committed to ensuring that employees feel able and comfortable to raise concerns in confidence without fear of personal repercussions.

Confidentiality

HSBC's policy is that staff and others should be able to raise matters of concern confidentially or anonymously. Appropriate steps should be taken to maintain that confidentiality and/or anonymity. The individual rights of those who may be the subject of a whistleblowing concern should be similarly protected.

Our Charter

Our Charter makes it clear that if staff have concerns that the standards contained in our policies and procedures are not being adhered to, they can speak up. This includes through HSBC Confidential.

Investigation Standards

HSBC has standards and policies for the investigation of cases reported to HSBC Confidential. Care is taken to ensure the investigation of all concerns are carried out thoroughly, independently and in a timely manner by the appropriate subject matter experts.

Governance

The Group Audit Committee and the Conduct and Values Committee are responsible for reviewing HSBC's whistleblowing procedures and receive regular updates on relevant matters of concern raised under these arrangements, together with any management actions taken in response.

Accounting Disclosures

Matters relating to accounting and internal financial controls or auditing matters can be reported through accountingdisclosures@hsbc.com. They are covered by the same policy standards as HSBC Confidential.

Retaliation

HSBC does not condone or tolerate any acts of retaliation against a whistleblower or other user of HSBC Confidential who reasonably believes that the concern that they have raised is true. HSBC considers any retaliation in those circumstances as a disciplinary matter.

HSBC defines retaliation as an unfavourable act or other adverse treatment which causes a whistleblower a detriment or places them at a disadvantage which has been prompted, wholly or in part, by that whistleblower's decision to speak out. Attempting to identify a whistleblower may breach this standard. All allegations of retaliation reported to HSBC Confidential are escalated to senior management.

HSBC considers the making of malicious or false claims to be incompatible with HSBC's values.