HSBC statement on whistleblowing arrangements

November 2025

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Introduction

We want colleagues and stakeholders to have confidence in speaking up when they observe unlawful or unethical behaviour. We offer a range of speak-up channels to colleagues to help ensure their concerns are handled through the most effective route.

Our global whistleblowing channel, HSBC Confidential, is one of our speak-up channels, which allows colleagues and other stakeholders to raise concerns confidentially and, if preferred, anonymously (subject to local laws). It can be used where a person feels other routes are inappropriate or are unavailable, or where they have concerns about the effectiveness or efficiency of another channel they have used.

Raising Concerns

In most of our markets, HSBC Confidential concerns are raised through an independent third party, offering 24/7 hotlines and a web portal in multiple languages.

We also provide and monitor an external email address for concerns about accounting, internal financial controls or auditing matters (accountingdisclosures@hsbc.com).

Confidentiality

Appropriate steps are taken to maintain the confidentiality and/or anonymity of any person raising an HSBC Confidential concern.

Investigation Standards

We have standards and policies to ensure that HSBC Confidential concerns are investigated in a proportionate, independent and timely manner, with actions taken where appropriate. This can include disciplinary action, such as dismissal and adjustments to variable pay and performance ratings, or operational actions, including changes to policies and procedures.

Governance

The Group Audit Committee has oversight of the Group's whistleblowing arrangements. The Chair of the Group Audit Committee acts as HSBC's Whistleblowers' Champion, with responsibility for ensuring and overseeing the integrity, independence and effectiveness of the Group's policies and procedures. Regulatory Compliance sets the whistleblowing policy and procedures, and provides the Group Audit Committee with periodic updates on their effectiveness.

Retaliation

We have a zero-tolerance policy for acts of retaliation against any person raising an HSBC Confidential Concern, or against any party connected to that person. Retaliation in any form, or attempts to prevent or hinder reporting of concerns, will be considered as a disciplinary matter.

HSBC