HSBC Thermal Coal Phase-Out Policy

December 2021
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This document is one of HSBC’s sustainability risk policies. It should be read in conjunction with Introduction to HSBC’s Sustainability Risk Policies, which explains common features and technical terms. In the event of a conflict between the Policy and the Introduction, this Policy shall prevail.

Introduction

In October 2020, HSBC set out an ambition to align its financed emissions – the greenhouse gas emissions of its portfolio of customers – to net zero by 2050 or sooner, to meet the 1.5°C global warming target. In order to achieve this, the bank will use science-based pathways, aligned with the goals and timelines of the Paris Agreement (“HSBC’s NZ50 Target”).

This Thermal Coal Phase-Out Policy (“Policy”) fulfils the commitment approved at HSBC’s 2021 Annual General Meeting to publish and implement a policy to phase out the financing of coal-fired power and thermal coal mining by 2030 in markets in the European Union (“EU”) / Organisation for Economic Cooperation and Development (“OECD”), and by 2040 in other markets (“Phase-Out Commitment”).

HSBC will: set interim targets and report progress in fulfilling the Phase-Out Commitment (Section A); assess clients’ transition plans in relation to HSBC’s NZ50 Target (Section B); and apply controls to the provision of financing and advisory services (Section C).

Scope and Definitions

Italicised terms used in this Policy are defined in the Glossary.

HSBC: This Policy applies to HSBC Holdings plc and its subsidiary undertakings.

Clients: This Policy applies to clients that are corporate entities (including state-owned enterprises), trusts or individuals that:

- own, control or operate thermal coal mines, thermal coal-fired power plants or coal to gas/liquids plants (together, thermal coal assets); or
- are engaged in activities that HSBC considers to be incompatible with HSBC’s NZ50 Target, including the creation of new thermal coal assets and new thermal coal infrastructure (see Section C for further details).

The Policy does not apply to clients engaged in exempted activities.

If an existing or prospective client is part of a wider group, HSBC will take into consideration the activities of the client group and apply this Policy to the extent appropriate in light of the organisational structure and governance of the client group.

This Policy applies to finance (or financing) and advisory services. Unless in conflict with fiduciary or other regulatory obligations, all relevant HSBC entities, products and businesses, including asset management, will seek to implement policies that support the transition from coal-fired power and thermal coal mining within HSBC’s 2030/40 timelines.

Any reference to a year means 31 December of that year.

Section A: Annual Review, Disclosures, Targets and Governance

HSBC will review the Policy at least annually to ensure that it remains aligned with the Phase-Out Commitment. The annual review will include consideration of changes in relevant external factors (e.g. changes in the scientific

1The policy is made public for information only. HSBC’s sustainability risk policies are for HSBC’s use only and HSBC shall owe no liability to third parties in relation to them.

2Please refer to HSBC Global Asset Management: Climate Policy for HSBC’s asset management approach to thermal coal.
assessment of climate change impacts, transition pathways and future risk or changes in governmental or regulatory treatment).

HSBC will report annually on progress in reducing financing in line with the Phase-Out Commitment.

Using its 2020 Task Force on Climate-Related Financial Disclosures (TCFD) as its baseline, HSBC intends to reduce thermal coal financing exposure by at least 25% by 2025, and aims to reduce thermal coal financing exposure by 50% by 2030. These targets will be reviewed in conjunction with assessments of client transition plans. Any remaining thermal coal financing exposure after 2030 will only relate to clients with thermal coal assets outside EU and OECD markets and will be phased out by 2040.

HSBC will also set short and medium-term financed emissions targets for coal-fired power in 2022.

This Policy will be implemented as part of HSBC’s risk framework, which includes formal governance committees at global, regional and country levels.

Section B: Client Transition Plans

HSBC will engage with clients and will expect them to formulate and publish transition plans that are compatible with HSBC’s NZ50 Target.

◆ HSBC’s assessments of clients’ transition plans will be based on factors including: level of ambition to reduce greenhouse gas emissions; clarity of transition strategy, including metrics, governance and targets; adequacy of disclosure; credibility of any proposed abatement assumptions; proposed post 2030/40 coal-fired power generation; and consideration of principles of ‘just transition’.

◆ HSBC expects to complete assessments relating to clients operating within EU and OECD markets by the end of 2022, and clients in all other markets by the end of 2023.

◆ HSBC recognises that state-owned enterprises in markets outside the EU and OECD may be subject to different national development planning cycles and in such cases, HSBC will take those planning cycles into account where necessary. Such cases will be subject to annual review to ensure that sufficient progress on transition planning is being made. This will not impact or alter HSBC’s Phase-Out Commitment timelines.

◆ HSBC will conduct appropriate due diligence in carrying out the assessments of client transition plans. Extended assessments will be pre-approved and monitored by relevant governance committees and, if considered appropriate, assessed further (for example, by independent review). Clearly, if no transition plans are produced, HSBC will need to formally assess whether we continue to provide financing for that client, as there will be no basis on which to assess progress towards the bank’s commitment to phase out thermal coal financing by 2030 in EU/OECD markets and by 2040 in non-EU/OECD markets.

◆ Given the importance of coal transition to the achievement of global climate ambitions, HSBC would expect its clients to publish their transition plans by the end of 2023. HSBC also expects clients to provide regular (usually annual) detailed disclosures to HSBC regarding the implementation of their transition plans. Exceptions in relation to publication and disclosure requirements will be considered by HSBC on a case by case basis (for example, taking into consideration the national climate plans of the markets in which the client operates).

Section C: Controls on Financing and Advisory Services

Existing Clients

Financing of existing clients will be reviewed annually in conjunction with the client transition plan assessment process. HSBC will discuss options with clients in order to agree a phase-out timeline, taking into account HSBC’s contractual obligations and the liquidity needs of the client.

HSBC considers that certain activities are incompatible with HSBC’s NZ50 Target. Consequently, HSBC will not provide new finance to any client for the specific purposes of, or new advisory services in connection with, such activities. These include, but are not limited to:
◆ creation of new thermal coal assets;
◆ thermal coal expansion;
◆ extensions to the unabated operating lifetime of existing thermal coal assets;
◆ new captive thermal coal-fired power plants or new captive thermal coal mines;
◆ new thermal coal infrastructure;
◆ thermal coal mines using Mountaintop Removal (including clients who derive more than 30% of their annual revenues from Mountaintop Removal coal mining); and
◆ for EU and OECD markets only, where the client's thermal coal related revenues are greater than 40% of total revenues (or 30% of total revenues by 2025), unless the new finance or new advisory services are to be used for the specific and demonstrable purpose of financing clean technology or infrastructure as part of the client's transition. This is particularly so, given our intent to have exited thermal coal assets in EU/OECD markets by 2030.

For non-EU/OECD markets, HSBC is not setting materiality thresholds, as we will evaluate the detail of the transition plans our clients produce and their alignment to HSBC’s commitment to have a net zero aligned portfolio of financed emissions by 2050. HSBC’s run down trajectory in non-EU/OECD markets will be guided by these plans and will be consistent with an end date of 2040.

HSBC will not provide any new financing or new advisory services to any client where the client declines to engage sufficiently on its transition plan or HSBC determines that the plan is not compatible with HSBC’s NZ50 Target.

HSBC will seek to withdraw, as soon as possible, any financing and advisory services with a client that has made or makes a new commitment to thermal coal expansion; or has proceeded or proceeds with thermal coal expansion. In such cases, if the client is part of a client group, HSBC will seek representations from the client group that new finance or new advisory services provided by HSBC to other members of the client group will not be used for such activities (see Enhanced Due Diligence section).

Prospective Clients

HSBC will not start a new relationship with a prospective client with one or more of the following characteristics:

◆ mining, where i) thermal coal related revenues are ≥10% of total revenues; or ii) annual thermal coal production is >5Mt; or iii) thermal coal, as a by-product from the extraction of metallurgical coal, is >15% of total production volumes; or
◆ power, where operational thermal coal power generating capacity is either i) ≥10% of total generating capacity; or ii) ≥3GW; or
◆ coal to gas / liquids, where coal-related revenues are ≥10% of total revenues,
except for the purposes of materially reducing greenhouse gas emissions, including by enabling the early retirement of existing thermal coal assets.

Enhanced Due Diligence (EDD)

Any new finance or new advisory services for existing clients with one or more of the following characteristics will require EDD and pre-approval by a relevant governance committee (except where the finance or advisory service is specifically provided for activities unrelated to thermal coal):

◆ mining, where either i) thermal coal related revenues are ≥20% of total revenues; or ii) annual thermal coal production is >10Mt; or
◆ power, where operational thermal coal power generating capacity is either i) ≥20% of total generating capacity; or ≥5GW; or
◆ coal to gas / liquids, where coal-related revenues are ≥20% of total revenues; or
the **client** is involved in the construction of a new **thermal coal asset**, where such construction started or was contractually committed (via power purchase agreement for **thermal coal-fired power plants**) before 01 January 2021 (as detailed above, HSBC will not **finance** the creation of a **new thermal coal asset**).

EDD and pre-approval will also be required for:

- any new relationship with a prospective **client**; or
- **new finance or new advisory services** for the purpose of materially reducing greenhouse gas emissions (EDD will include consideration of any proposed **abatement assumptions**) from or enabling the early retirement, sale, purchase or refinancing of **thermal coal assets**; or
- **new finance or new advisory services** for a **client** group where it is known that any part of the **client** group is engaged in activities that HSBC considers to be incompatible with HSBC’s NZ50 Target. In such circumstances, HSBC will seek additional representations from the **client** group that **new finance or new advisory services** provided by HSBC will not be used for such activities.
## Glossary

The following definitions apply to the Policy:

<table>
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<th>Term</th>
<th>Definition</th>
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| abatement assumptions                            | Assumptions covering aspects such as:  
  i. technologies identified (e.g. carbon capture and storage);  
  ii. if available, track record for deploying the technologies;  
  iii. availability and scale of deployment of the technologies proposed; and  
  iv. any socio-economic risks associated with the technologies identified. |
| advisory services                                 | The provision of (or when considering the provision of) financial or investment banking advisory services to clients.                                                                                                                                                                                      |
| captive thermal coal-fired power plants          | thermal coal-fired power plants dedicated to a specific project or industrial facility, such as an aluminium smelter, a steel mill or cement plant.                                                                                                                                                               |
| captive thermal coal mines                       | thermal coal mines dedicated to providing thermal coal for captive thermal coal-fired power plants.                                                                                                                                                                                                      |
| clients                                          | As defined in “Scope and Definitions”. The Policy also applies to in-scope clients that are seeking, so far as HSBC is aware, to own, control or operate thermal coal assets.                                                                                                                                     |
| coal to gas / liquids plant                      | An industrial plant or facility that converts coal into coal gas, liquid hydrocarbons, liquid fuels or petrochemicals.                                                                                                                                                                                      |
| new coal to gas / liquids plant                  | new coal to gas / liquids plant means:  
  (i) the creation of new coal to gas / liquids plants; or  
  (ii) expansions to existing coal to gas / liquids plants (except for the purpose of retrofitting an asset to materially reduce greenhouse gas emissions).  

The terms coal to gas / liquids plant and new coal to gas / liquids plant do not include exempted activities. |
| exempted activities                               | Means the following:  
  • captive thermal coal-fired power plants;  
  • captive thermal coal mines;  
  • thermal coal services:  
    • metallurgical coal activities and mines;  
    • underground coal gasification (coal bed methane); and  
  • all other activities of clients.  

For the avoidance of doubt, the Policy does apply to clients engaged in new captive coal-fired power plants and new captive thermal coal mines. |
| finance or financing                              | The provision of (or when considering the provision of) project finance, direct lending, or arranging or underwriting of capital markets transactions to clients.                                                                                                                                                                                                 |
| new finance or financing                         | New finance or financing means the provision of new finance to a client, including the refinancing of existing finance facilities.                                                                                                                                                                         |
| governance committee                             | A formal, internal, risk governance committee that exists at either global, regional or country level across HSBC’s global businesses to provide recommendations and advice on customers, transactions and wider reputational risks. These committees form part of HSBC’s risk framework.                                                                                       |

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3 In HSBC’s 2021 Notice of Annual General Meeting, the terms “coal-fired power” and “thermal coal mining” were used. In this Policy, “coal-fired power” means thermal coal-fired power plants and “thermal coal mining” means thermal coal mines, as defined in this Glossary.
| **metallurgical coal activities and mines** | Activities involved in the value chain of the iron and steel sector and metallurgical coal mines where 30% or less of either production or the coal reserve is thermal coal. Metallurgical coal is also known as “coking coal”. |
| **Mountaintop Removal** | A form of surface mining at the summit or summit ridge of a mountain in the Central Appalachian Mountains of the United States of America. |
| **post 2030/40 coal-fired power generation** | Where thermal coal-fired power plants are projected to continue or potentially continue operating beyond 2030 in EU or OECD markets or beyond 2040 in other markets, such thermal coal-fired power plants are expected to meet the following requirements:  
  i. solely utilised as flexible back up to zero or low carbon power supply;  
  ii. abated to reduce greenhouse gas emissions to near zero through the use of credible abatement technologies and assessed in the operating context of the asset;  
  iii. not generating revenues, beyond 2030 or 2040 (whichever is applicable), greater than 5% of the client’s total revenues;  
  iv. not receiving any direct or indirect (e.g. via financing provided to a parent company) finance from HSBC; and  
  v. be included in a client transition plan assessed to be aligned with HSBC’s NZ50 Target. |
| **thermal coal assets** | thermal coal mines, thermal coal-fired power plants and coal to gas / liquids plants. |
| **new thermal coal assets** | new thermal coal assets means new thermal coal mines, new thermal coal-fired power plants and new coal to gas / liquids plants.  
The terms thermal coal assets and new thermal coal assets do not include exempted activities. |
| **thermal coal expansion** | Means:  
  (i) for thermal coal mining, increases in total tonnage of thermal coal extracted;  
  (ii) for coal to gas / liquid production, increases in total tonnage of thermal coal utilised; or  
  (iii) for power, increases in net operational thermal coal power capacity,  
in each case where such expansion:  
  * refers to absolute global increases rather than increases for clients as a result of corporate mergers and acquisitions; and  
  * was not already either: (a) contractually committed (via power purchase agreement for coal-fired power generation); or (b) under construction, in each case before 01 January 2021; and  
  * does not include exempted activities. |
| **thermal coal infrastructure** | Infrastructure assets dedicated to support thermal coal assets, such as coal terminals or coal railways. |
| **new thermal coal infrastructure** | new thermal coal infrastructure means:  
  (i) the creation of thermal coal infrastructure; or  
  (ii) expansions to existing thermal coal infrastructure (except for the purposes of retrofitting an asset to materially reduce greenhouse gas emissions).  
The terms thermal coal infrastructure and new thermal coal infrastructure do not include exempted activities. |
### thermal coal mines

All mines where more than 30% of either production or the coal reserve is thermal coal.

### new thermal coal mines

$new\text{thermal coal mines}$ means:

(i) the creation and commercialisation of $new\text{thermal coal mines}$ or major capital equipment for $new\text{thermal coal mines}$; or

(ii) expansions to existing $thermal coal mines$ that involve geographically separate locations and/or major new infrastructure.

The terms $thermal coal mines$ and $new\text{thermal coal mines}$ do not include exempted activities.

### thermal coal services

Coal trading, coal logistics, coal processing, coal power transmission, coal-related operation & maintenance (O&M) services, coal mining services, coal-related engineering, procurement and construction services, coal exploration, coal equipment manufacturing and coal advisory services.

### thermal coal-fired power plants

Thermal power plants which burn thermal coal to generate electricity.

### new thermal coal-fired power plants

$new\text{thermal coal-fired power plants}$ means:

(i) the creation of $new\text{thermal coal-fired power plants}$; or

(ii) expansions to existing $thermal coal-fired power plants$ (except for the purpose of retrofitting an asset to materially reduce greenhouse gas emissions).

The terms $thermal coal-fired power plants$ and $new\text{thermal coal-fired power plants}$ do not include exempted activities.

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**Important Notice**

The Policy should not form the basis of any third party’s decision to undertake, or otherwise, any activity and third parties do not have any right to rely on it. The Policy, by its nature, is not comprehensive and has not been independently verified. It contains various statements that are or could be “forward-looking” statements including as to HSBC’s intentions and objectives. However, a number of risks, uncertainties and other important factors could cause actual developments and / or results to differ materially from HSBC’s expectations.

In making the assessments and determinations further described in the Policy, HSBC will use such information, as it determines necessary and relevant, in its sole discretion. However, there can be no guarantee of the accuracy, currency or completion of such information, which may not have been independently verified.

Neither HSBC nor any of its officers, employees, agents or advisers (“HSBC Group”) accepts any duty of care, responsibility or liability in relation to the Policy or its application or interpretation, including as to the accuracy, completeness or sufficiency of it or any outcomes arising from the same. No representations or warranties, express or implied, are made by the HSBC Group as to the fairness, accuracy, completeness or correctness of the Policy, the information in the Policy, HSBC’s application or interpretation of it or as to the achievement or reasonableness of any forward-looking statements.

Save as expressly set out in the Policy, HSBC is not under any obligation and does not give any undertaking to provide any additional information in relation to the Policy or its application, to update the Policy or to correct any inaccuracies or errors. HSBC reserves the right, without giving reason, to amend the Policy at any time.