

Financial Institution Name: Location (Country) :

HSBC Group	
United Kingdom	

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal name	HSBC Holdings Plc
2	Append a list of foreign branches which are covered by this questionnaire	List of subsidiaries available in the HSBC Group Annual Report: https://www.hsbc.com/investors/results-and-announcements/annual-report List of locations available in Global USA Patriot Act Certification: https://www.hsbc.com/who-we-are/esg-and-responsible-business/ fighting-financial-crime/financial-crime-risk-policies
3	Full Legal (Registered) Address	8 Canada Square, London E14 5HQ, United Kingdom
4	Full Primary Business Address (if different from above)	8 Canada Square, London E14 5HQ, United Kingdom
5	Date of Entity incorporation/establishment	January 1, 1959
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	Yes
6 a1	If Y, indicate the exchange traded on and ticker symbol	HSBC has a primary share listing on the UK's London Stock Exchange (HSBA) and branch listings on the Hong Kong Stock Exchange (0005) and Bermuda Stock Exchange (HSBC.BH). Its shares are also listed on Euronext Paris (HSBC) and on the New York Stock Exchange (HSBC).
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	N/A
7	% of the Entity's total shares composed of bearer shares	N/A
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	N/A
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Provide Legal Entity Identifier (LEI) if available	MP6I5ZYZBEU3UXPYFY54
2. AML, C	TF & SANCTIONS PROGRAMME	
11	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
11 a	Appointed Officer with sufficient experience/expertise	Yes
11 b	Adverse Information Screening	Yes
11 c	Beneficial Ownership	Yes
11 d	Cash Reporting	Yes
11 e	CDD	Yes
11 f	EDD	Yes
11 g	Independent Testing	Yes
11 h	Periodic Review	Yes
11 i	Policies and Procedures	Yes
11 j	PEP Screening	Yes
11 k	Risk Assessment	Yes
11 I	Sanctions	Yes
11 m	Suspicious Activity Reporting	Yes
11 n	Training and Education	Yes
11 o	Transaction Monitoring	Yes
12	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	No - HSBC's Global Financial Crime Policy is approved annually by the Group Head of Financial Crime and presented to senior management committees, including the Group Risk Committee, a sub-committee of the HSBC Holdings PLC Board of Directors.
13	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes
13 a	If Y, provide further details	HSBC outsources some activities to third parties, including other HSBC entities, subject to HSBC's FC Policies & Programme eg audit requirements. HSBC will not outsource any Compliance function(s) which are prohibited under local regulations.
14	Does the entity have a whistleblower policy?	Yes

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24 c Nature of business/employment Yes 24 d Ownership structure Yes 24 e Product usage Yes 24 f Purpose and nature of relationship Yes 24 g Source of funds Yes 24 h Source of wealth Yes 25 Are each of the following identified: 25 a Ultimate beneficial ownership Yes 25 b Are ultimate beneficial owners verified? Yes 25 b Authorised signatories (where applicable) Yes 25 c Key controllers Yes 26 Does the due diligence process result in customers			
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24 e Product usage Yes 24 f Purpose and nature of relationship Yes 24 g Source of funds Yes 24 h Source of wealth Yes 25 Are each of the following identified: 25 a Ultimate beneficial ownership Yes 25 a1 Are ultimate beneficial owners verified? Yes 25 b Authorised signatories (where applicable) Yes 25 c Key controllers Yes 25 d Other relevant parties 26 Does the due diligence process result in customers	24 d	Ownership structure	Yes
24 f Purpose and nature of relationship Yes 24 g Source of funds Yes 24 h Source of wealth Yes 25 Are each of the following identified: 25 a Ultimate beneficial ownership Yes 25 a1 Are ultimate beneficial owners verified? Yes 25 b Authorised signatories (where applicable) Yes 25 c Key controllers Yes 25 d Other relevant parties Yes 26 Does the due diligence process result in customers			
24 gSource of fundsYes24 hSource of wealthYes25Are each of the following identified:Image: Control of the following identified:25 aUltimate beneficial ownershipYes25 a1Are ultimate beneficial owners verified?Yes25 bAuthorised signatories (where applicable)Yes25 cKey controllersYes25 dOther relevant partiesYes26Does the due diligence process result in customersYes			
24 gSource of fundsYes24 hSource of wealthYes25Are each of the following identified:Image: Control of the following identified:25 aUltimate beneficial ownershipYes25 a1Are ultimate beneficial owners verified?Yes25 bAuthorised signatories (where applicable)Yes25 cKey controllersYes25 dOther relevant partiesYes26Does the due diligence process result in customersYes	24 f	Purpose and nature of relationship	Yes
24 h Source of wealth Yes 25 Are each of the following identified: 25 a Ultimate beneficial ownership Yes 25 a1 Are ultimate beneficial owners verified? Yes 25 b Authorised signatories (where applicable) Yes 25 c Key controllers Yes 25 d Other relevant parties Yes 26 Does the due diligence process result in customers	24 g	Source of funds	Yes
Are each of the following identified: 25 a Ultimate beneficial ownership 25 a1 Are ultimate beneficial owners verified? 25 b Authorised signatories (where applicable) 25 c Key controllers 25 d Other relevant parties 26 Does the due diligence process result in customers Yes Ves			
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25 a1 Are ultimate beneficial owners verified? 25 b Authorised signatories (where applicable) 25 c Key controllers 25 d Other relevant parties 26 Does the due diligence process result in customers Yes Ves Ves		Are each of the following identified:	
25 a1 Are ultimate beneficial owners verified? 25 b Authorised signatories (where applicable) 25 c Key controllers 25 d Other relevant parties 26 Does the due diligence process result in customers Yes Ves Ves	25 a	Ultimate beneficial ownership	Yes
25 b Authorised signatories (where applicable) 25 c Key controllers 25 d Other relevant parties 26 Does the due diligence process result in customers Yes Yes Yes		'	
25 c Key controllers Yes 25 d Other relevant parties Yes 26 Does the due diligence process result in customers Yes Yes Yes			
25 d Other relevant parties Yes 26 Does the due diligence process result in customers Yes	25 b	Authorised signatories (where applicable)	Yes
25 d Other relevant parties Yes 26 Does the due diligence process result in customers Yes	25 c	Key controllers	Yes
26 Does the due diligence process result in customers		· · ·	
		<u>'</u>	163
receiving a risk classification?	26		Vac
' ' '	l .	receiving a risk classification?	100
			·

27	Does the Entity have a risk based approach to screening	
	customers and connected parties to determine whether they	Yes
	are PEPs, or controlled by PEPs?	
28	Does the Entity have policies, procedures and processes to	
120	review and escalate potential matches from screening	
		Yes
	customers and connected parties to determine whether they	
	are PEPs, or controlled by PEPs?	
29	Is KYC renewed at defined frequencies based on risk rating	
	(Periodic Reviews)?	Yes
29 a	If yes, select all that apply:	
		V
29 a1	Less than one year	Yes
29 a2	1 – 2 years	Yes
29 a3	3 – 4 years	Yes
29 a4	5 years or more	Yes
29 a5	Trigger-based or perpetual monitoring reviews	Yes
29 a6	Other (please specify)	N/A
30	From the list below, which categories of customers or	
	industries are subject to EDD and/or are restricted, or	
	prohibited by the Entity's FCC programme?	
30 a	Arms, Defence, Military	EDD on a risk based approach
30 b	Respondent Banks	EDD on a risk based approach
		EDD on a risk based approach
30 b1	If EDD or EDD & restricted, does the EDD assessment	
I	contain the elements as set out in the Wolfsberg	Yes
	Correspondent Banking Principles 2022?	
30 с	Embassies/Consulates	EDD on a risk based approach
30 d	Extractive industries	EDD on a risk based approach
30 e	Gambling customers	EDD on a risk based approach
30 f	General Trading Companies	No EDD/restriction or prohibition
30 g	Marijuana-related Entities	EDD on a risk based approach
30 h	MSB/MVTS customers	EDD on a risk based approach
30 i	Non-account customers	Restricted
30 j	Non-Government Organisations	EDD on a risk based approach
30 k	Non-resident customers	EDD on a risk based approach
30 I	Nuclear power	EDD on a risk based approach
30 m	Payment Service Providers	EDD on a risk based approach
30 n	PEPs	EDD on a risk based approach

30 o	PEP Close Associates	EDD on a risk based approach
30 p	PEP Related	EDD on a risk based approach
30 q	Precious metals and stones	EDD on a risk based approach
30 r	Red light businesses/Adult entertainment	EDD on a risk based approach
30 s	Regulated charities	EDD on a risk based approach
	<u> </u>	
30 t	Shell banks	Prohibited
30 u	Travel and Tour Companies	EDD on a risk based approach
30 v	Unregulated charities	EDD on a risk based approach
30 w	Used Car Dealers	EDD on a risk based approach
30 x	Virtual Asset Service Providers	Restricted
30 y	Other (specify)	Yes - Entities or individuals that pose significant reputational risk to HSBC
31	If restricted, provide details of the restriction	Additional high risk customer classification and due diligence,
		increased monitoring, customer selection and approval process, in line with
		relevant local regulatory requirements or restrictions.
6. MONITO	ORING & REPORTING	
32	Does the Entity have risk based policies, procedures and	
الأ		Yes
I	monitoring processes for the identification and reporting of	100
<u> </u>	suspicious activity?	
33	What is the method used by the Entity to monitor	Combination of automated and manual
L	transactions for suspicious activities?	Combination of automatod and manual
33 a	If manual or combination selected, specify what type of	Manual TM is done where it is deemed appropriate considering the size and nature of
	transactions are monitored manually	the business. All large business areas will use Automated TM, and select small
	,	markets for certain lines of business may rely on manual monitoring in the form of
		exception reports or manual Red Flag processes.
34	Does the Entity have regulatory requirements to report	Vee
I	suspicious transactions?	Yes
34 a	If Y, does the Entity have policies, procedures and	
۲۰۰۳	processes to comply with suspicious transactions	Yes
		100
<u> </u>	reporting requirements?	
35	Does the Entity have policies, procedures and processes to	
	review and escalate matters arising from the monitoring of	Yes
	customer transactions and activity?	
7. PAYME	NT TRANSPARENCY	
36	Does the Entity adhere to the Wolfsberg Group Payment	Yes
ļ	Transparency Standards?	
37	Does the Entity have policies, procedures and processes to	
I	comply with and have controls in place to ensure	
I	compliance with:	
37 a	FATF Recommendation 16	Yes
37 b	Local Regulations	Yes

Specify the regulation	HSBC has policies, procedures and processes in place to comply with applicable local regulations as a minimum. In addition, HSBC's global minimum requirements are informed by requirements set by HSBC's core Regulators (EU; UK; HK; US; UN) which are followed by our branches and subsidiaries where permissible.
xplain	N/A
Entity have a Sanctions Policy approved by ment regarding compliance with sanctions law e to the Entity, including with respect to its conducted with, or through accounts held at nancial institutions?	Yes
Entity have policies, procedures or other controls by designed to prohibit and/or detect actions taken applicable sanctions prohibitions, such as or the resubmission and/or masking, of sanctions information in cross border transactions?	Yes
Entity screen its customers, including beneficial p information collected by the Entity, during ng and regularly thereafter against Sanctions Lists?	Yes
e Sanctions Lists used by the Entity in its sanctions g processes:	
lidated United Nations Security Council Sanctions N)	Used for screening customers and beneficial owners and for filtering transactional data
States Department of the Treasury's Office of n Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
ean Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
naintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
(specify)	Screening customers and transactions globally against the sanctions lists issued by the UN, UK and US. Lists issued by G7 countries screened only in the applicable jurisdiction. Screening locally against other sanctions lists that apply to HSBC's operations in a particular jurisdiction, including sanctions imposed by the EU and HK in those jurisdictions.
Entity have a physical presence, e.g. branches, ries, or representative offices located in stregions against which UN, OFAC, OFSI, EU or G7 countries have enacted comprehensive jurisdictionanctions?	
DUCATION	
Entity provide mandatory training, which includes:	
ication and reporting of transactions to government ities	Yes
ducts and services offered	Yes
al policies for controlling money laundering, terroristing and sanctions violations	Yes
sues that occur in the market, e.g. significant tory actions or new regulations	Yes
ove mandatory training provided to :	
and Senior Committee Management	Yes
e of Defence	Yes
ne of Defence	Yes
ne of Defence	Yes
parties to which specific FCC activities have been parced	Yes
mployed workers (contractors/consultants)	Yes
on to inspections by the government ors/regulators, does the Entity have an internal ction, a testing function or other independent third both, that assesses FCC AML, CTF, ABC, Fraud ctions policies and practices on a regular basis?	Yes
on to i ors/re ction, both,	nspections by the government gulators, does the Entity have an internal a testing function or other independent third that assesses FCC AML, CTF, ABC, Fraud

Signature Page		
Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2)		
HSBC Holdings Plc	(Financial Institution name)	
I, <u>Jennifer Calvery</u> (Senior Compliance Manager – Second Line representative), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg FCCQ are complete and correct to my honest belief.		
Jennifer Calvery 20/07/2023	(Signature & Date)	