



Financial Institution Name:  
Location (Country) :

HSBC Group  
United Kingdom

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: <a href="https://www.hsbc.com/investors/results-and-announcements/annual-report">https://www.hsbc.com/investors/results-and-announcements/annual-report</a> List of locations available in Global USA Patriot Act Certification: <a href="https://www.hsbc.com/who-we-are/esg-and-responsible-business/fighting-financial-crime/financial-crime-risk-policies">https://www.hsbc.com/who-we-are/esg-and-responsible-business/fighting-financial-crime/financial-crime-risk-policies</a>
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 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	MLU0Z03ML4LN2LL2TL39
<b>2.AML, CTF &amp; SANCTIONS PROGRAMME</b>		
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 l	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 updates are presented to senior management committees, including the Group Risk Management Meeting, 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, including implementing appropriate controls and oversight to manage the risk and monitor the outsourced activities. HSBC will not outsource any Compliance function(s) which are prohibited under local regulations.
14	Does the entity have a whistleblower policy?	Yes
<b>3.ANTI BRIBERY &amp; CORRUPTION</b>		
15	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes

16	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
17	Does the Entity provide mandatory ABC training to:	
17 a	Board and Senior Committee Management	Yes
17 b	1st Line of Defence	Yes
17 c	2nd Line of Defence	Yes
17 d	3rd Line of Defence	Yes
17 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
17 f	Non-employed workers as appropriate (contractors/consultants)	Yes
<b>4. AML, CTF &amp; SANCTIONS POLICIES &amp; PROCEDURES</b>		
18	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
18 a	Money laundering	Yes
18 b	Terrorist financing	Yes
18 c	Sanctions violations	Yes
19	Does the Entity have policies and procedures that:	
19 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes
19 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
19 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
19 d	Prohibit accounts/relationships with shell banks	Yes
19 e	Prohibit dealing with another Entity that provides services to shell banks	Yes
19 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
19 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
19 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes
19 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
19 j	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes
20	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
21	Does the Entity have record retention procedures that comply with applicable laws?	Yes
21 a	If Y, what is the retention period?	5 years or more
<b>5. KYC, CDD and EDD</b>		
22	Does the Entity verify the identity of the customer?	Yes
23	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes
24	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
24 a	Customer identification	Yes
24 b	Expected activity	Yes
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 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 receiving a risk classification?	Yes
27	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes

28	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
29	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
29 a	If yes, select all that apply:	
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	Always subject to EDD
30 b	Respondent Banks	EDD on a risk based approach
30 b1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
30 c	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	EDD on a risk based approach
30 g	Marijuana-related Entities	Restricted
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 l	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
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.
<b>6. MONITORING &amp; REPORTING</b>		
32	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
33	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
33 a	If manual or combination selected, specify what type of transactions are monitored manually	Manual TM is done where it is deemed appropriate considering the size and nature of 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 suspicious transactions?	Yes
34 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	Yes
35	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
<b>7. PAYMENT TRANSPARENCY</b>		
36	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
37	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
37 a	FATF Recommendation 16	Yes
37 b	Local Regulations	Yes
37 b1	If Y, 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.
37 c	If N, explain	N/A

<b>8. SANCTIONS</b>		
<b>38</b>	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes
<b>39</b>	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes
<b>40</b>	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
<b>41</b>	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
<b>41 a</b>	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
<b>41 b</b>	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
<b>41 c</b>	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
<b>41 d</b>	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
<b>41 e</b>	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
<b>41 f</b>	Other (specify)	Screening customers and transactions globally against the sanctions lists issued by the UN, UK and US. List 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. Customers and beneficial owners are screened globally by all HSBC Group Entities. Transactional data is only required, under HSBC's Global Financial Crime Policy, to be screened against the EU sanctions lists by HSBC entities that operate within (or where performing transactions related to) the EU or are subject to EU jurisdiction.
<b>42</b>	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
<b>9. TRAINING &amp; EDUCATION</b>		
<b>43</b>	Does the Entity provide mandatory training, which includes:	
<b>43 a</b>	Identification and reporting of transactions to government authorities	Yes
<b>43 b</b>	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
<b>43 c</b>	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
<b>43 d</b>	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
<b>44</b>	Is the above mandatory training provided to :	
<b>44 a</b>	Board and Senior Committee Management	Yes
<b>44 b</b>	1st Line of Defence	Yes
<b>44 c</b>	2nd Line of Defence	Yes
<b>44 d</b>	3rd Line of Defence	Yes
<b>44 e</b>	Third parties to which specific FCC activities have been outsourced	Yes
<b>44 f</b>	Non-employed workers (contractors/consultants)	Yes
<b>10. AUDIT</b>		
<b>45</b>	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes

**Signature Page**

Wolfsberg Group Financial Crime Compliance Questionnaire 2023 (FCCQ V1.2)

HSBC Holdings Plc

(Financial Institution name)

I, Jennifer Shasky Calvery (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.



Monday 29<sup>th</sup> June 2026