

HSBC CONFIDENTIAL

Terms and Conditions and Privacy Statement

HSBC Confidential is the HSBC whistleblowing channel. This document provides important information relating to the use of HSBC Confidential. Please take the time to read this information.

General Use

HSBC Confidential is operated by Whistleblowing Oversight Teams within Compliance and is subject to all of the rules held within this document.

When raising a case through HSBC Confidential, your data may be collected by NAVEX Global, a third party to the HSBC Group. The relevant data privacy statement can be found on the NAVEX Global web portal.

After raising your concern through HSBC Confidential, please do not raise it via any other internal channel as this may delay the investigation process.

Your concern will be impartially investigated in an appropriate and timely manner by relevant subject matter experts. If the team handling your concern does not think HSBC Confidential is the most appropriate channel, an alternative route may be recommended.

All concerns are logged and treated confidentially as far as possible. All identifying details are securely maintained with access controls in place to confirm only authorised staff handling your concern have access. You are encouraged to provide identifying details as this may help to facilitate the investigation and the level of feedback able to be provided at the conclusion of a case.

All information relating to a HSBC Confidential case will be kept confidential to protect the identity of individual submitting the report and the subject of the report. There are limited exceptions to the general requirement for confidentiality where there is good reason to disclose, for example when required by law or regulation.

Privacy Statement

In raising a concern via the HSBC Confidential channel, you acknowledge that any data you provide will be processed and handled for the purposes of the investigation. Any personal data you provide will be kept confidential and processed in accordance with applicable data privacy laws and the HR Data Privacy Notice which can be found on HR Direct (if applicable within your jurisdiction).

The information you provide may be shared with other HSBC group entities including across borders to jurisdictions which do not have data protection laws providing the same level of protection as the jurisdiction in which you are based. The information may also be shared subject to applicable data privacy laws, with any sub-contractors, agents, advisers or service providers of the HSBC group (including their employees, directors and officers) as well as any regulatory authorities of the HSBC group.

The information provided will be kept confidential and protected by appropriate security and technical measures at all times.

The data controller in relation to the information you provide is the HSBC group entity which is conducting the investigation into your concern. Information provided in a report will be kept in accordance with existing records retention schedules for the relevant HSBC group entity.

In certain jurisdictions, data privacy laws may allow you to make a written request for a copy of the personal data we hold about you and to ask us to rectify, erase or block any inaccurate data. You should make a request to the HSBC group entity which is conducting the investigation and will be able to direct your query.

Management Reporting of Whistleblowing Cases

Aggregated data from concerns raised through HSBC Confidential is used in presentations and governance reports for management information purposes. Data is collected and collated securely to ensure that the identity of the person who raised the concern is always protected and anonymised. This means that where cases are used in any reports, nothing that may reveal your identity will be disclosed. Board reports provide aggregated data, for example the total number of HSBC Confidential cases from various regions in which HSBC operates, the categories of concerns, and management information on trends. Where specific details of cases warrant the attention of the Board, the cases are also anonymised.