



## HSBC Sanctions Policy Statement

HSBC is committed to complying with the sanctions laws and regulations of the European Union, Hong Kong, the United Kingdom, the United Nations, and the United States, as well as other applicable sanctions laws and regulations in the jurisdictions in which HSBC operates, subject to the primacy of local laws and regulations.

HSBC's Global Sanctions Policy defines the minimum standards which all HSBC Group entities must comply with, including:

- Screening customers/clients and transactions globally against the sanctions lists issued by the United Nations, the European Union, the United Kingdom, the United States and Hong Kong.
- Screening locally against other sanctions lists that apply to HSBC's operations in a particular jurisdiction.
- Prohibiting business activity, including prohibitions on commencing or continuing customer relationships or providing products or services or facilitating transactions that HSBC believes may violate applicable sanctions laws or HSBC's Global Sanctions Policy. This includes prohibitions on business activity with individuals or entities named on a sanctions list or activity, directly or indirectly, involving countries or territories subject to comprehensive sanctions. As of October 2019, these countries and territories include Cuba, Iran, North Korea, Syria and the Crimea region.
- Restricting certain business activity involving, directly or indirectly, countries or persons subject to more selective or targeted sanctions programmes. These sanctions apply restrictions on some types of products or services or target certain industry sectors or governments. As of October 2019, the selective country programmes prohibit transactions and services relating to:
  - the provision of funding to the Government of Belarus or Government of Zimbabwe;
  - a donation from the Government of Sudan to a U.S. person;
  - certain activity involving the Government of Venezuela<sup>1</sup>;
  - certain debt or equity of, and certain other transactions and services involving, the Russian financial, energy and defence sectors;
  - participating in the primary market for non-ruble bonds issued by, and lending non-ruble denominated funds to, the Russian Sovereign<sup>2</sup>
- Investigating all customer/client alerts or transactions that are stopped in HSBC's screening systems. While HSBC seeks to investigate these alerts and transactions in a reasonable timeframe, compliance with applicable sanctions laws or HSBC's Global Sanctions Policy may result in delays to the processing of customer transactions while additional due diligence is conducted and information obtained on the nature of the underlying transaction or the parties involved.
- Blocking or rejecting transactions where HSBC is required to do so under applicable sanctions laws or regulations or HSBC's Global Sanctions Policy. Transactions may also be returned by HSBC where they fall outside of HSBC's risk appetite.
- Reporting breaches of sanctions laws to the relevant regulatory authority. This can include any attempt by a customer to evade sanctions laws.

HSBC may agree to process certain transactions, in its sole discretion, such as those which relate to humanitarian aid or which are otherwise permitted by a licence from an appropriate authority. These transactions will be considered on a case-by-case basis and must be submitted in advance to HSBC for consideration and approval.

HSBC may, in its sole discretion, also decide not to process transactions, provide products or services or otherwise facilitate transactions even where permitted by applicable sanctions laws and regulations where these activities fall outside of HSBC's risk appetite.

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<sup>1</sup> The term "Government of Venezuela" means The state and Government of Venezuela, any political subdivision, agency, or instrumentality thereof, including the Central Bank of Venezuela and Petroleos de Venezuela, S.A. ("PdVSA"), any person owned or controlled, directly or indirectly, by the foregoing, and any person who has acted or purported to act directly or indirectly for or on behalf of, any of the foregoing, including as a member of the Maduro regime.

<sup>2</sup> The term "Russian sovereign" means any ministry, agency, or sovereign fund of the Russian Federation, including the Central Bank of Russia, the National Wealth Fund, and the Ministry of Finance of the Russian Federation.

The English version of the HSBC Sanctions Policy Statement prevails to the extent of any inconsistency between the English and the Chinese versions. Any Chinese version of the HSBC Sanctions Policy Statement is for reference only.

## 滙豐制裁政策聲明

受當地法律和規例凌駕的前提下，滙豐致力遵守由歐盟、香港、英國、聯合國以及美國制定的制裁法和規例，以及於滙豐業務所在的司法管轄區適用的其他制裁法和規例。

滙豐環球制裁政策界定所有滙豐集團旗下的機構必須遵守的最低標準，包括：

- 根據聯合國、歐盟、英國財政部、美國財政部海外資產控制辦公室以及香港金融管理局發出的制裁名單，篩查顧客/ 客戶以及他們於全球的交易。
- 根據於滙豐業務所在的個別司法管轄區適用的制裁名單，於當地進行篩查。
- 禁止滙豐認為可能違反適用的制裁法或滙豐環球制裁政策的業務往來，包括禁止展開或繼續維持客戶關係，或提供產品或服務，或促進交易。這包括禁止與制裁名單上的個人或機構進行業務往來，或與受全面制裁的國家或地區進行直接或間接的往來。截至 2019 年 10 月，這些國家及地區包括古巴、伊朗、北韓、敘利亞以及克里米亞地區。
- 限制與直接或間接受選擇性或針對性制裁計劃的國家或人士進行某些業務往來。此等制裁向某些種類產品或服務施加限制，或針對某些行業或政府。截至 2019 年 10 月，選擇性國家計劃禁止與下列有關的交易或服務：
  - 向白俄羅斯政府或津巴布韋政府提供資金；
  - 由蘇丹政府向美國人士進行捐獻；
  - 涉及委內瑞拉政府<sup>1</sup>的某些活動；
  - 俄羅斯金融、能源以及國防行業的某些債務或股權，及某些涉及俄羅斯金融、能源以及國防行業的其他交易或服務；
  - 參與俄羅斯主權<sup>2</sup>發行非盧布計價債券的集資市場，及向俄羅斯主權借出非盧布幣值的資金。
- 調查所有顧客/ 客戶警示或所有被滙豐的篩查系統截停的交易。儘管滙豐會嘗試在合理的時間內調查這些警示及交易，為遵守適用的制裁法或滙豐環球制裁政策，須進行額外的盡職審查及獲取有關交易性質或交易各方的資料，這可能會引致在處理客戶交易時有所延誤。
- 根據適用的制裁法或規例或滙豐環球制裁政策要求阻擋或拒絕交易。如該項交易超出滙豐可接納的風險程度，該項交易亦可能被拒絕。
- 向相關的監管機構舉報違反制裁法情況，這可以包括客戶企圖逃避制裁法的情況。

滙豐可全權酌情同意處理某些交易，包括有關人道救援或已獲得適當機構的許可。這些交易將會按個別情況考慮，並須預先提交予滙豐作考慮及批核。

如果有關交易超出滙豐可接納的風險程度，即使適用的制裁法及規例允許，滙豐可全權酌情決定不會處理交易、提供產品或服務或促使交易。

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<sup>1</sup> 「委內瑞拉政府」一詞指委內瑞拉國家及政府、該國的任何政治分支、機構或媒介，包括委內瑞拉中央銀行、委內瑞拉石油公司、任何由上述一方直接或間接擁有或控制的人士，及任何已實際或宣稱直接或間接為或代表上述任何一方行事的人士，包括馬杜羅政權的成員。

<sup>2</sup> 「俄羅斯主權」一詞是指俄羅斯聯邦的任何部門、機構或主權基金，包括俄羅斯中央銀行、國家財富基金 (National Wealth Fund) 及俄羅斯聯邦財政部。

本滙豐制裁政策聲明的英文版本與中文版本如有任何不一致，概以英文版本為準。本滙豐制裁政策聲明的任何中文版本僅供參考。