



## HSBC's Global Sanctions Policy Statement

HSBC is committed to combatting financial crime and complying with all applicable sanctions laws and regulations in the jurisdictions in which we operate. One of the ways in which we meet this objective is through HSBC's Global Sanctions Policy (the "Policy"). Subject to the primacy of local law and considering broader financial crime risk, the Policy seeks to establish a globally consistent standard to effectively manage sanctions compliance risk across all HSBC wholly or majority-owned or controlled legal entities, helping us to protect the global financial system, our reputation and to best serve our customers. The Policy generally prohibits relationships or transactions involving sanctioned individuals and entities or comprehensively sanctioned countries, territories and their governments.

In compliance with our regulatory requirements and our Policy we may be required from time to time to reject transactions, freeze assets or refuse to provide services. It also means that at times, our Policy and sanctions risk appetite may be stricter than our legal obligations, and we may choose not to support certain customer relationships or business activity even if it is legally permitted. HSBC may, in its sole discretion, agree to process certain transactions prohibited or restricted under the Policy that are authorised by a licence from an appropriate authority or are otherwise permitted under applicable laws and regulation, such as those which relate to humanitarian aid. These transactions will be considered by HSBC on a case-by-case basis.

In case of any discrepancies or inconsistencies between the English and Chinese versions of the HSBC's Global Sanctions Policy Statement, the English version shall apply and prevail.



## 滙豐環球制裁政策聲明

滙豐致力打擊金融罪行及遵守我們業務所在的司法管轄區內所有適用之制裁法律及規例。我們實現此目標的其中一個方法是透過滙豐環球制裁政策（「**本政策**」）。受業務所在地法律凌駕的前提下，並顧及更廣泛的金融犯罪風險，本政策尋求確立一套環球一致的標準，以有效管理滙豐所有全資擁有或擁有大多數股權或控制的法律實體的制裁合規風險，這有助我們保護環球金融體系、我們的聲譽、以及更好地服務客戶。本政策總體上禁止涉及受制裁個人、實體或受全面制裁的國家、地區及其政府的客戶關係或交易。

為遵守相關監管要求及本行政策，我們可能會不時拒絕交易、凍結資產或拒絕提供服務。這也意味著，我們的政策及可接納的制裁風險程度或許相較於我們的法律義務更為嚴格，而我們亦可能不會支援某些法律上准許的客戶關係或業務往來。滙豐可全權酌情決定，同意處理某些雖於本政策下被禁止或限制但獲得有關當局授權或於適用法律及規例下獲准的交易，例如有關人道救援的交易。這些交易將會按個別情況考慮。

如本滙豐環球制裁政策聲明中英文本有歧義，概以英文版本為準。