

HSBC Modern Slavery and Human Trafficking Statement 2024



HSBC

Opening up a world of opportunity

Statement Preface

The HSBC Australia Modern Slavery Statement for 2024 is reported in June 2025 in two (2) parts:

1. Part 1: The “HSBC Modern Slavery and Human Trafficking Statement 2024” (referred to as ‘the HSBC Group Statement’) published by HSBC Holdings plc (‘HSBC Group’), under the United Kingdom Modern Slavery Act (2015); and
2. Part 2: The “HSBC Australia Modern Slavery Statement Addendum 2024” (referred to as ‘the Addendum’) published by HSBC Bank Australia Limited, The Hongkong and Shanghai Banking Corporation Limited Sydney Branch, and HSBC Australia Holdings Pty Limited (collectively ‘HSBC Australia’), under the Australian Modern Slavery Act (2018)

HSBC Australia has enhanced the HSBC Australia Modern Slavery Statement Addendum 2024 to illustrate:

- ◆ The relationship of the HSBC Australia Statement Addendum under Australian legislation to the HSBC Group Statement under United Kingdom legislation;
- ◆ The relationship of HSBC Australia’s Human Rights policies and practices to HSBC Group’s Human Rights policies and practices; and
- ◆ Australian specific practices and continuous improvement objectives that HSBC Australia has completed separately to, or in addition to, the improvement objectives of HSBC Group

In changing our Statement format, HSBC Australia continues to meet all the Mandatory Reporting Criteria under the Australian Modern Slavery Act (2018).



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Section 1: About HSBC

HSBC is one of the largest banking and financial services organisations in the world.

Guided by our purpose of "opening up a world of opportunity", our ambition is to be the preferred international financial partner for our clients.

For further information on our Group structure see www.hsbc.com/who-we-are.

What we do

In 2024, we served around 41 million customers worldwide through a network covering 58 countries and territories. Our customers range from individual savers and investors to some of the world's biggest companies, governments and international organisations.

We serve our customers through four businesses: Hong Kong, UK, Corporate and Institutional Banking, and International Wealth and Premier Banking.

We help millions of our retail and wealth customers look after their day-to-day finances and manage, protect and grow their wealth.

Our global reach and expertise help domestic and international businesses around the world unlock their potential and we provide a comprehensive range of financial services and products to corporates, governments and institutions.

Section 2: Our policies

How we do business is as important as what we do. This is consistent with the HSBC values.

In our [Human Rights Statement](#) we set out how we seek to meet our responsibility to respect human rights. Our approach is guided by the UN Guiding Principles on Business and Human Rights (UNGPs) and the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises on Responsible Business Conduct.

Human rights considerations are reflected in several Group-wide policies. Taken together, these policies govern our behaviour as a provider of financial services to business and personal customers, as a buyer of goods and services, as an investor and as an employer.

This Statement builds on the Human Rights Statement, with more specific information on our approach to tackling modern slavery and human trafficking. Modern slavery includes, but is not limited to, child labour, forced labour and debt bondage.

Employees

HSBC's commitment to respect human rights in the workplace, including the right to decent work and freedom from discrimination, aligns with our values and is set out in our global policy. Our approach is set out in detail on the HSBC Group website – see [Our commitments and actions](#).

Business customers

Our sustainability risk policies form part of our broader risk management framework and are important mechanisms for managing risks. These policies focus on mitigating reputational, credit, legal and other risks related to our customers' environmental and social impacts. For further details, see our sustainability risk policies at [Sustainability risk | Managing risk | HSBC Holdings plc](#).

In 2003, HSBC adopted the Equator Principles, which provide a framework to assess and manage environmental and social risks when financing large projects. Where relevant, this includes consideration of whether projects will meet International Finance Corporation (IFC) Performance Standards, including those covering child labour, forced labour and restrictions on collective bargaining.

A just and inclusive transition means working to avoid people and communities being left behind. We are starting to address just transition-associated risks in relation to our business customers through our policies and risk management processes.

Our financial crime policies also apply to business customers, as set out below.

Suppliers

Our Supplier Code of Conduct (the Code) was refreshed in 2024. The Code sets out our ambitions and areas of focus with respect to the environment, diversity and human rights, and outlines the minimum standards we expect of our suppliers on these areas. We continue to formalise adherence to the Code in our supplier contracts, which includes the right to audit and to act if a breach is discovered. At the end of 2024, 96.7% of approximately 10,400 contracted suppliers had either confirmed adherence to the Code or provided their own alternative that was accepted by our Global Procurement function. Under the Code, HSBC reserves the right to review suppliers' policies, procedures or any other documents related to compliance with the Code. In some cases, HSBC may require an online or on-site audit of a supplier.

For further details of the number of suppliers in each geographical region, see the ESG Data Pack at www.hsbc.com/esg.



Investment

HSBC Asset Management recognises the impact which Environmental, Social and Governance (ESG) factors can have on the sustainability of companies, investment returns and risk. Human rights issues are amongst those considered in its due diligence, engagement and voting.

Personal customers

The provision of services to our personal customers may be linked to modern slavery through association with the financial activities of perpetrators of these crimes and their victims. Our financial crime policies, set out below, help us to identify these associations and take appropriate action. Some of our customers may themselves be vulnerable to modern slavery. We look for indicators that this might be the case, either from activity on customer accounts or interactions with branch staff, alerting relevant authorities if suspicions arise.

Financial crime

HSBC is committed to preventing our products and services from being exploited for criminal activity. One of the ways in which HSBC meets this objective is through our Global Financial Crime Policy (FC Policy), which establishes our minimum risk management and control requirements to enable HSBC and its staff to detect, analyse, investigate, report and mitigate the risk of HSBC facilitating or being used to facilitate financial crime. The FC Policy is designed to comply with the applicable money laundering, terrorist financing, proliferation financing, sanctions, export controls, bribery and corruption, tax evasion and fraud laws and regulations in the markets in which we operate. Perpetrators of modern slavery may generate profits that would be considered proceeds of crime; their actions may constitute money-laundering, predicate offences and could also be a source of terrorist financing. Public authorities may impose sanctions for human rights abuses including modern slavery, and we recognise that bribery and corruption can also contribute to such abuses.



Section 3: Our approach to due diligence and risk management

Risk overview

An analysis of our salient human rights issues indicated that HSBC is most likely to be exposed to modern slavery through its relationships with business customers, suppliers and investee companies, especially (though not exclusively) those operating, or with supply chains, in sectors dependent on low-skilled or migrant workers with a high turnover of potentially vulnerable workers or in places where these practices are prevalent.

Modern slavery issues were assessed as far less likely to arise in respect of our own employees; the financial services sector is not among those considered high risk in this regard. Nevertheless, we take a range of steps to help ensure our employees' right to decent work is respected under the policies referenced in the Employees section, above.

Business customers

Due diligence

HSBC's relationship managers are the primary point of contact for many of our business customers and are responsible for managing customers' adherence to applicable policies and procedures, including our sustainability risk policies.

They are supported by Sustainability Risk Managers across the Group, who have responsibility for advising on, and overseeing, the management of environmental and social risks. Sustainability Risk Managers are supported by Group Reputational and Sustainability Risk, a central team responsible for developing policies, guidance and training, and overseeing overall policy compliance.

HSBC aims to investigate potential adverse human rights impacts, including those related to modern slavery, where credible allegations are reported, or where potential issues are identified and escalated. Business customer relationships may also be subject to further review by relevant Risk Committees.

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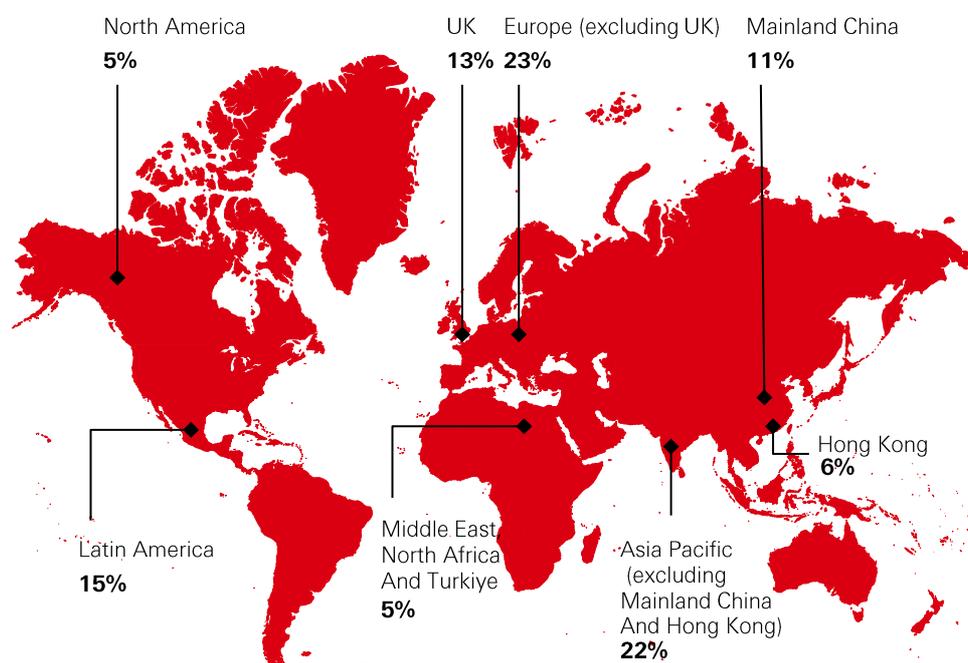
We obtain independent negative news data from a specialist vendor to help give us a clearer picture as to whether customers are acting responsibly on sustainability issues, including modern slavery.

Suppliers

Due diligence

We have developed a human rights due diligence operating procedure for Procurement globally. The procedure describes the due diligence process to be undertaken to identify suppliers where the risk of adverse human rights impact is considered higher and the process to be followed to review and mitigate the risk.

HSBC Group is supported by over 19,000 suppliers, across the regions shown in the map below. These suppliers, and the companies that supply them, constitute our global supply chain. HSBC's major categories of spending include consultancy/professional services, IT services, corporate real estate and services that support our banking operations.



Engagement

Our Code (see Section 2, above) gives us the right to conduct audits and to request evidence of due diligence processes in respect of any of the issues covered, including modern slavery.

Investment

Due diligence

HSBC Asset Management uses a third-party research provider which monitors for controversies that could represent breaches of UN Global Compact (UNGC) principles, including those linked to human rights. This third-party monitoring may prompt due diligence on issuers of listed securities held in actively managed fundamental equity and fixed-income sustainable portfolios in HSBC Asset Management's main international investment offices. The findings of the due diligence are reviewed within its investment governance structures.

Engagement & voting

HSBC Asset Management's Stewardship Plan includes a set of engagement guidelines and expectations on human rights, which acts as a reference for its engagements with companies where human rights have been identified as a material investment issue. Its Global Voting Guidelines provide an overview of its approach to exercising its shareholder rights in respect of ESG issues, including human rights and workforce risk management. HSBC Asset Management participates in collaborative initiatives on human rights, such as PRI Advance and the Investor Initiative on Human Rights Data.

Personal customers

We continued to expand our Survivor Bank programme, which supports survivors of vulnerable situations including modern slavery and human trafficking in the UK.

Financial crime risk management

Our financial crime controls help us to identify and assess the risks posed by customers, employees and third parties, and determine whether we wish to establish a relationship with them. If we do establish a relationship, we continue to seek to identify risks by screening them against specified lists, indicators and known typologies, and by monitoring our customers' transactions.

Where we believe we have identified signs of financial crime risk, including in association with potential human rights abuses, we seek to investigate and take appropriate mitigating action, including reviewing the relationship and reporting to relevant government authorities.

Each month in 2024 we monitored approximately 900 million transactions for signs of financial crime. We performed daily screening of approximately 121 million customer records for sanctions exposure. In 2024, we filed over 113,000 suspicious activity reports to law enforcement and regulatory authorities where we identified potential financial crime.



Section 4: Measuring effectiveness

We recognise the need to monitor the development of our approach to tackling modern slavery, and other human rights issues. Some of the metrics we use are included in the table below, along with some context on the way we use the data to help ensure continual improvement.

Key Performance Indicator	2024	2023	Context
Survivor Bank Accounts (cumulative)	3,631	3,020	The 'Survivor Bank' programme supports survivors of vulnerable situations including modern slavery and human trafficking.
Percentage of contracted suppliers who have either confirmed adherence to the code of conduct or provided their own alternative that was accepted by our Global Procurement function	96.7%	95%	As described in Sections 2 and 3 above, our Code is a key element of our policy, risk management and due diligence processes in respect of our suppliers. By tracking suppliers that do not sign our Code, and through formalising adherence to the Code in supplier contracts, we can seek to increase supplier acceptance.



Section 5: Training

Enhancing our understanding of modern slavery

We believe in continuous education and in ensuring that our front-line employees are equipped with the right tools and training to be effective in their roles. To support this, we produce briefings based on global news and trends, and encourage our employees to pursue certifications from relevant organisations.

In 2024, we provided practical guidance and training, where relevant, to our colleagues across the Group on how to identify and manage human rights risk. We also provided a detailed course on modern slavery to over 200 employees in the Risk team, highlighting the importance of identification and escalation. We delivered modern slavery and human rights training to 11,884 employees across our regions.

Our compliance team delivers insights on human trafficking risks and their impact on the financial services sector through internal reports and training sessions.

In Asia-Pacific, HSBC continues to assess developments in human trafficking risks across the region, leveraging information toolkits and reports by non-profit organisation partners and from regulators via established public-private partnerships and industry working groups. Organisations such as the Mekong Club and the International Centre for Missing & Exploited Children (ICMEC) facilitate cross-industry information-sharing on criminal typologies specific to each geographical region, including evolving risks related to the trafficking and exploitation of adults and children.

In 2024, we strengthened staff awareness of human trafficking risks in the region and their impact on the financial services sector. For example, HSBC's Compliance team and the Mekong Club delivered staff training on industrial scale "scam centres", which have emerged across several jurisdictions, and which exploit human trafficking victims to engage in fraud and money laundering. The training reached over 1,000 colleagues in the region, providing information on demographic and transactional risk indicators as well as insights on how human trafficking intersects with other financial crime themes. HSBC also maintains specific modules on human trafficking risks within our suite of online training, which is available to staff across the Bank.

In 2024, our Supply Chain Sustainability team provided training to regional Procurement teams, to provide a baseline understanding of key sustainability issues relevant to Procurement, including human rights.

Our Wholesale banking business has developed training to support relationship managers in dealing with potential adverse human rights impacts related to our business customers.

Our Wealth and Personal Banking team delivered training to raise awareness of modern slavery, helping employees to identify signs of abuse and escalate concerns through established channels. Our customer-facing employees globally are trained to identify and support vulnerable customers as part of their induction training.

In our Asset Management business, internal training on human rights has also been carried out during the year.

Working in partnership

HSBC is a strong proponent of public-private partnerships and information sharing initiatives. We play an active or founding member role in these partnerships in numerous jurisdictions around the world and, where the law allows, work cooperatively with other participants in the global financial system to share both strategic and tactical information to help combat financial crime, including that related to modern slavery. We work with a range of markets and standard-setting bodies, including the Financial Action Task Force (FATF), to share our initiatives and findings.

In the UK, for example, HSBC continues to be a leading member of the [Joint Money Laundering Intelligence Taskforce \(JMLIT\)](#). One of JMLIT's key operational priorities is "understanding and disrupting the funding flows linked to organised immigration crime and human trafficking". HSBC has participated in joint law enforcement and civil society conferences, including the UNGC's UK Modern Slavery Working Group. We aim to engage with NGOs and civil society groups when they raise concerns related to HSBC customers. HSBC is a member of the Thun Group of banks, the main purpose of which is to deepen understanding of the UNGPs within the context of banks, and to consider how these principles may be applied across the range of different banking activities.

Section 6: Governance

This Statement covers the period from 1 January to 31 December 2024.

In 2021, we enhanced our governance on human rights by appointing key members of our Group Executive Committee (forerunner of the Group Operating Committee) to our Human Rights Steering Committee. In 2024, this Committee met on three occasions.

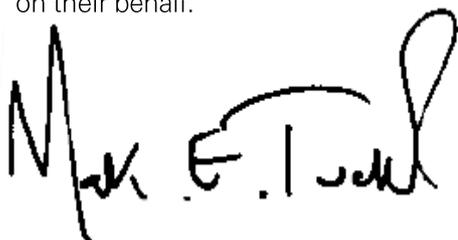
Responsibility for the development and review of the policies listed in Section 2 is listed in the table below

Policy	Department	Function
Sector risk policies for business customers	Sustainability Risk	Group Risk and Compliance
Financial Crime policies	Financial Crime	Group Risk and Compliance
Employee policies	Talent Management, Performance Reward and Employee Relations	Group Human Resources

HSBC's approach to reporting under the UK Modern Slavery Act was developed by a Group-wide Human Rights Disclosures Network coordinated by Group Public Affairs, drawing on resources from all relevant functions, businesses and geographies. The Statement was considered and approved by:

HSBC Holdings plc ESG Committee
HSBC Holdings plc Disclosure and Controls Committee
Boards of other HSBC Group entities required to report under the UK Modern Slavery Act listed in the adjacent table.
HSBC Holdings plc Board

The Statement is signed by the Group Chairman on behalf of the Board of Directors of HSBC Holdings plc and of the entities listed in the adjacent table. The Boards of Directors of the entities listed in the adjacent table approved the Statement on the dates shown, and delegated authority to the Group Chairman to sign on their behalf.



Sir Mark Tucker Group Chairman

13 February 2025

The HSBC Group entities required to report under the Act are:

Entity	Date of Approval
HSBC Holdings plc	13 February 2025
HSBC Alternative Investments Limited	11 February 2025
HSBC Asia Pacific Holdings (UK) Limited	10 February 2025
HSBC Bank plc	12 February 2025
HSBC Equipment Finance (UK) Limited	7 February 2025
HSBC Finance (Netherlands)	10 February 2025
HSBC Global Asset Management (UK) Limited	11 February 2025
HSBC Global Asset Management Limited	12 February 2025
HSBC Global Services (UK) Limited	12 February 2025
HSBC Global Services Limited	11 February 2025
HSBC Group Management Services Limited	11 February 2025
HSBC Holdings B.V.	10 February 2025
HSBC Innovation Bank Limited	12 February 2025
HSBC Investment Bank Holdings Limited	27 January 2025
HSBC Invoice Finance (UK) Limited	6 February 2025
HSBC Latin America Holdings (UK) Limited	29 January 2025
HSBC Life (UK) Limited	11 February 2025
HSBC Overseas Holdings UK Limited	10 February 2025
HSBC UK Bank plc	11 February 2025
Marks and Spencer Financial Services plc	12 February 2025

Part 2: HSBC Australia Modern Slavery Statement Addendum 2024

This is the HSBC Australia Modern Slavery Statement Addendum (the Addendum) to meet the Australian Modern Slavery Act 2018 (Cth) obligations (the Australian Act). This Addendum should be read in conjunction with the HSBC Modern Slavery and Human Trafficking Statement 2024 (Part 1).

This Addendum covers for HSBC Australia the period from 1 January to 31 December 2024 (the reporting period).

For HSBC Australia, all **HSBC Group Policies, Due Diligence and Risk Management** including **Risk Overview, Business Customers, Suppliers, Investments, Personal Customers** (excluding the Survivor Bank programme), **Financial Crime risk management** and **Enhancing our understanding of modern slavery**, as set out above in the “HSBC Modern Slavery and Human Trafficking Statement 2024” are applicable. References to numbers and percentages in the Group statement include Australia.

All additional content set out below in the Addendum relates explicitly to HSBC Australia for the requirements of the Australian Act, or, to summarise activities completed by HSBC Australia in 2024 that are in addition to those activities set out in the HSBC Group statement above.



Section A1: About HSBC Australia

HSBC Holdings plc, the parent company of the HSBC group of entities (referred to in the Addendum as either **HSBC** or **HSBC Group**), is headquartered in the United Kingdom. The Hongkong and Shanghai Banking Corporation Limited is a wholly owned subsidiary of HSBC Holdings plc and is the principal Asia Pacific banking entity of HSBC Group based in Hong Kong.

There are four HSBC entities in Australia of which three are 'reporting entities' under the Australian Act:

- ◆ HSBC Bank Australia Limited (**HSBC Australia subsidiary**) – a locally incorporated and regulated, authorised deposit-taking institution that is wholly owned (and indirectly controlled) by The Hongkong and Shanghai Banking Corporation Limited (ABN 48 006 434 162; AFSL/Australian credit licence 232595). The HSBC Australia subsidiary's registered address is at Level 36, Tower 1, International Towers Sydney, 100 Barangaroo Avenue, Sydney NSW 2000
- ◆ The Hongkong and Shanghai Banking Corporation Limited, Sydney Branch (**HSBC Australia branch**) – a branch of The Hongkong and Shanghai Banking Corporation Limited, which is a non-Australian, foreign-registered authorised deposit-taking institution (ABN 65 117 925 970 and AFSL 301737). The HSBC Australia branch's registered address is at Level 36, Tower 1, International Towers Sydney, 100 Barangaroo Avenue, Sydney NSW 2000
- ◆ HSBC Australia Holdings Pty Limited (**HSBC Australia Holdings**) – a non-trading holding company of HSBC Australia subsidiary. It is locally incorporated (ABN 22 006 513 873) and a subsidiary of The Hongkong and Shanghai Banking Corporation Limited. HSBC Australia Holding's registered address is at Level 36, Tower 1, International Towers Sydney, 100 Barangaroo Avenue, Sydney NSW 2000
- ◆ HSBC Australia subsidiary has one wholly owned nominee company, HSBC Custody Nominees (Australia) Limited (**HSBC Custody Nominees**). This entity is a nominee entity only, which exists for the purpose of holding client assets on behalf, and at the direction, of HSBC Australia subsidiary. It does not have its own employees, suppliers or customers and is not a reporting entity within the meaning of the Australian Act. It is included in this Addendum as an entity that is owned and controlled by HSBC Australia subsidiary

HSBC Australia subsidiary, HSBC Australia branch and HSBC Australia Holdings are collectively referred to in the Addendum as **HSBC Australia**, unless where otherwise noted. References within the Addendum to 'we' or 'our' are references to the above three 'reporting entities', being **HSBC Australia**.



Who we are

HSBC Australia subsidiary was established in 1965 and offers an extensive range of financial services through a network of branches and offices based in metropolitan areas of Australia. We serve our customers through our global businesses: International Wealth & Premier Banking (IWPB) and Commercial and Institutional Banking (CIB). As of 31 December 2024, HSBC Australia has approximately 1,800 full-time equivalent staff based in Australia.

Further details on the structure and performance of HSBC Group can be found in the Strategic Report section of its Annual Report and Accounts 2024 which is available on the [HSBC Group website](#). In addition, further detail on the structure and performance of our Australian operations is available on the [HSBC Australia website](#).

Context

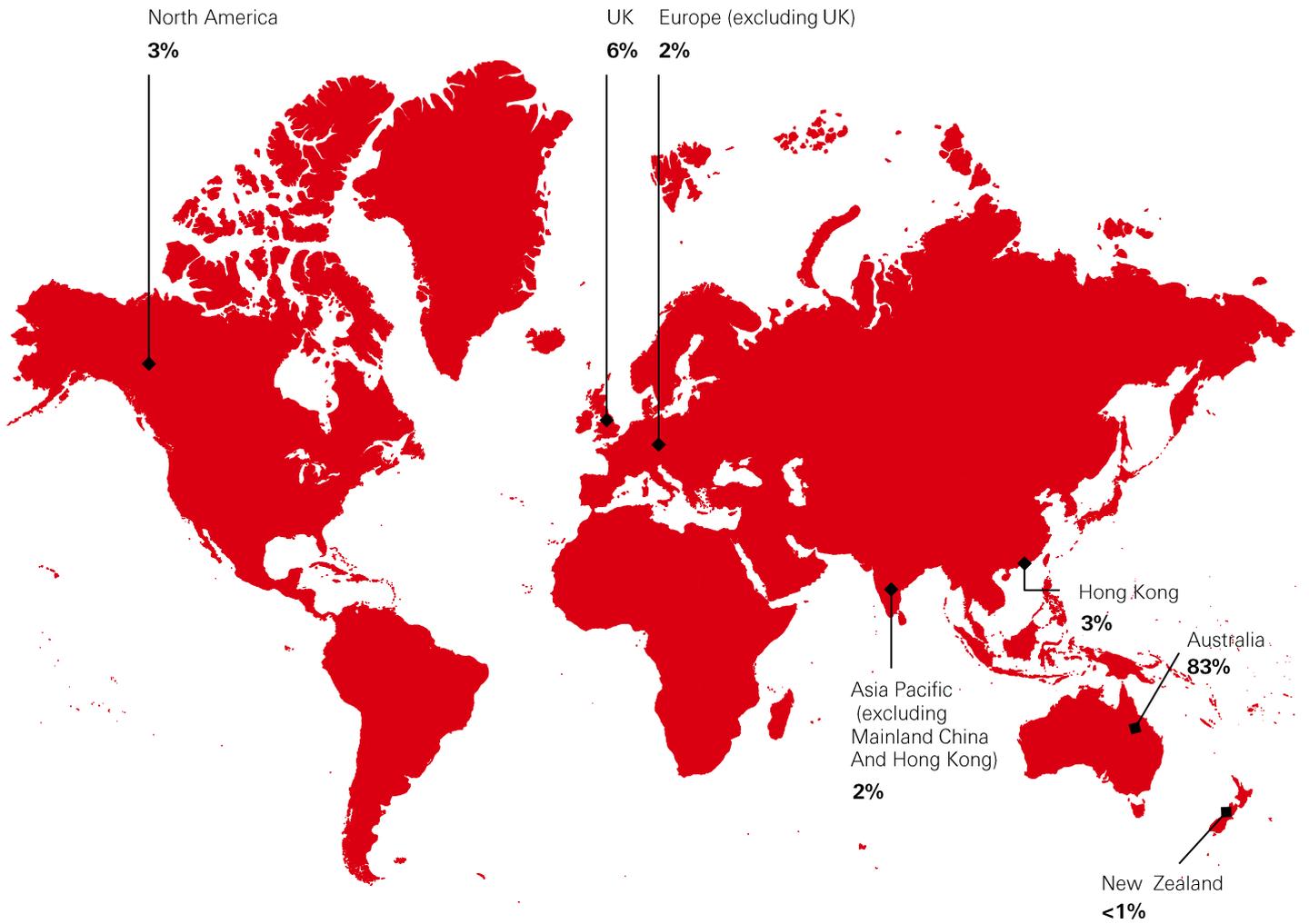
This Australian Modern Slavery Statement Addendum has been prepared as a joint statement to meet the mandatory reporting criteria set out under the Australian Act, with reference to the guidelines issued by the Attorney-General's Department, and has been prepared with reference to the [ninth statement](#) issued by HSBC Group with respect to modern slavery and human trafficking under the UK Modern Slavery Act 2015.

This Addendum outlines the actions undertaken by HSBC Australia to identify and mitigate the risk of modern slavery occurring in its business operations and supply chain for the reporting period. We also report on steps that HSBC Australia have taken to improve their approach to identifying, assessing and managing modern slavery-related risks in their operations and supply chain.

HSBC Australia's Suppliers

HSBC Australia is supported by approximately 520 external suppliers providing services from the geographical regions outlined below and includes 191 contracted suppliers, and low risk suppliers that are engaged through purchase orders only. HSBC Australia's major categories of spending include consultancy and professional services, IT services, corporate real estate and services that support our banking operations.





Geographical distribution of HSBC Australia's external third party supplier footprint

HSBC Australia in the normal course of its business operations also receives services from other HSBC entities (referred to as Internal Third Parties). Internal Third Parties have been considered in the preparation

of this Addendum and include third- and fourth-party internal relationships. Collectively all third parties and, where applicable, the entities that supply them constitute our **supply chain**.



Section A3: Approach to Due Diligence and Risk Management

Risk Overview

Most of HSBC Australia's suppliers are based in geographical locations considered inherently low risk for modern slavery. However, we are aware that slavery like practices can also occur in low-risk jurisdictions for certain high risk service categories so apply risk management processes to elevated Environmental, Social and Governance (ESG) risk service category sectors of our Australian supply chain regardless of location.

Business Customers

A CIB (previously CMB and GBM) customer review of modern slavery risk was conducted on a subset of Australian entities shortlisted based on independent negative news data for assessment, and, human rights and modern slavery risk training provided to the relationship managers of these clients. There were 17 instances raised as part of preliminary risk identification and three clients were referred for risk assessment. The completion of these reviews resulted in ongoing monitoring of two clients.

Suppliers

Due diligence

HSBC Australia applies the human rights due diligence operating procedure to the total contracted supplier footprint, expanding the screening process beyond contracted suppliers with identified elevated ESG risk service category sectors.

In 2024, HSBC Australia also concluded the outcomes of our 2023 independent ESG and human rights audit. The audit and its recommended corrective action plans were conducted by reputable external human rights specialists and referenced in our 2023 Statement.

Of five suppliers who undertook corrective action plans from the 2023 audit, four have completed agreed actions within agreed timeframes. The remaining supplier has since also become a reporting entity under the Australian Act, and has incorporated remediation by JUN25 for purposes of its own modern slavery reporting requirements. Based on the issue typologies identified by our audit partner and status of the remaining supplier's progress, HSBC contracted suppliers are assessed as operating within our ESG risk appetite.

Internal Third Parties

In 2024, HSBC Australia also received 426 unique business services from 29 other HSBC entities managed under six intra-group service agreements. Internal third parties are HSBC employed personnel protected under all relevant and applicable laws, regulations and policies. Personnel protection includes, but is not limited to, anti-harassment, anti-bullying, freedom of association, agreed remuneration and leave, workplace flexibility, occupational health and safety and confidential employee support services including whistleblowing.

Financial Crime Risk Management

HSBC Australia each month monitors over 12.5 million transactions on average for signs of financial crime. In 2024 approximately 4,340 suspicious activity reports were referred to law enforcement and regulatory authorities for identified potential financial crime, and approximately 1.4 million customer records were screened daily for sanctions exposure.



Section A4: Measuring Effectiveness

We recognise the need to monitor the development of our approach to tackling modern slavery, and other human rights issues. Some of the metrics we use are included in the table below, along with some context on the way we use the data to help ensure continual improvement.

For HSBC Australia’s 191 contracted suppliers for the reporting period some of the metrics we use are included in the table below.

Key Performance Indicator	2024	Context
Percentage of contracted suppliers assessed for ESG risks including modern slavery under our category based ESG risk management methodology	100%	100% (94) of HSBC Australia contracted suppliers in-scope of category based ESG risk comply with screening requirements, and none are assessed as high risk. The remaining 97 other contracted suppliers not in scope of category based ESG risk were also assessed in 2024, to complete screening of the entire HSBC Australia contracted supplier footprint. As a result, we will adopt ESG screening of all contracted suppliers additional to those in scope of category based ESG risk on an ongoing basis.
Percentage of contracted suppliers who have either confirmed adherence to the supplier code of conduct or provided their own alternative that was accepted by our Global Procurement function	97.4%	HSBC Australia aims to work with the five (2.6%) contracted suppliers who are yet to confirm adherence in the normal course of our contract management lifecycles, and assess for any potential gaps to our code.
Percentage of contracted suppliers assessed under the financial crime risk process by our Financial Crime function	100%	No HSBC Australia suppliers screened for sanctions were escalated for further review or investigative action.



Section A5: Training

Enhancing our understanding of modern slavery

In 2024, HSBC Australia delivered training to over 99% of all Australia employees during the reporting period. In 2024, we undertook training of modern slavery risk within our business customers. In preparation for the review described in Section A3 Business Customers, we undertook tailored training for Relationship Managers within our CMB and GBM business segments. This involved specialist training from subject matters experts from HSBC Group and local staff.



Section A6: Governance

HSBC Australia's approach to reporting under the Australian Modern Slavery Act was developed by an entity-wide Modern Slavery Statement Network and coordinated by Group Procurement, drawing on resources from all relevant functions, businesses, and geographies.

In 2023, HSBC Australia created an Environmental, Social and Governance Forum, co-chaired by HSBC Australia's Chief Risk and Compliance Officer and Chief of Staff. In 2024 this forum met on four occasions. Members of the ESG Forum were the HSBC Australia Executive Committee and key subject matter experts. The ESG matters are also overseen by the HSBC Australia Board Risk Committee.

HSBC Australia governs its supply chain under the Third Party Risk Framework which manages all risks, including Human Rights and Modern Slavery. Oversight and governance of the framework is provided by the Third Party Governance Committee, with our Chief Operating Officer as Chair. In 2024 this Committee met on six occasions. The Committee is overseen by the HSBC Australia Executive Committee and, by virtue of the Committee Chair, and by the HSBC Australia Board Risk Committee.



Section A7: Improving our statement over time

HSBC Australia will continue to develop its modern slavery risk management capability by taking the following steps:

Supply chain:

- ◆ Complete additional modern slavery and human rights risk reviews in collaboration with independent external human rights specialists
- ◆ Complete screening of Australian contracted suppliers onboarded since completion of 2024 screening described in Section A4
- ◆ Commence initial human rights reviews of 4th Parties in our supply chain

Business Customer:

- ◆ Uplift human rights risk assessments of customers by introducing new tooling and risk mapping capability

Training & Partnerships:

- ◆ Deliver new human rights training modules and risk management playbooks to our Business Relationship Managers
- ◆ Collaborate with the Mekong Club to review process and provide additional training and awareness for our Procurement and Risk and Compliance functions

Governance

- ◆ The ESG Forum will be amalgamated into HSBC Australia's Risk Management Meeting in 2025. This will elevate ESG matters into HSBC Australia's formal Risk and Compliance governance for Management oversight

This Statement Addendum was approved by the Boards of HSBC Australia subsidiary, HSBC Australia Holdings and HSBC Custody Nominees on 13 June 2025, 11 June 2025 and 11 June 2025 respectively in their capacity as the principal governing body of these entities and by the Senior Officer Outside Australia in his role as principal governing body of HSBC Australia branch on 11 June 2025.

Chief Executive Officer / Executive Director



Antony Shaw

as authorised signatory on behalf of each of:

- ◆ HSBC Bank Australia Limited
- ◆ The Hongkong and Shanghai Banking Corporation Limited, Sydney Branch
- ◆ HSBC Australia Holdings Pty Limited
- ◆ HSBC Custody Nominees (Australia) Limited

Appendix 1 **Mandatory Reporting Criteria under the Modern Slavery Act**

This HSBC 2024 Modern Slavery Statement has been prepared in accordance with the mandatory criteria set out in the Australian Modern Slavery Act 2018 (Cth). The following table references the content in this Statement which complies with Section 16 of the Australian legislation.

	Mandatory Reporting Criteria	Section of Statement
1	Identify the RE (s16(1)(b))	Part 2: HSBC Australia Modern Slavery Statement Addendum Section A1 – ‘About HSBC’
2	Describe the RE’s structure, operations, and supply chains (s16(1)(b))	Part 2: HSBC Australia Modern Slavery Statement Addendum Section A1 – ‘About HSBC’ including specifically: Who we are; and Our Suppliers Section A3 – ‘Approach to Due Diligence and Risk Management’
3	Describe the modern slavery risks in the operations and supply chains of the RE (s16(1)(c))	Part 1: HSBC Group Statement Section 2 – ‘Policies’ Section 3 – ‘Approach to Due Diligence and Risk Management’ including specifically: Risk Overview Part 2: HSBC Australia Modern Slavery Statement Addendum Section A3 – ‘Approach to Due Diligence and Risk Management’ including specifically: Risk Overview
4	Describe the actions taken to assess and address these risks, including due diligence and remediation processes (s16(1)(d))	Part 1: HSBC Group Statement Section 2 – ‘Policies’ Section 3 – ‘Approach to Due Diligence and Risk Management’ Section 4 – ‘Measuring Effectiveness’ Section 5 – ‘Training’ Part 2: HSBC Australia Modern Slavery Statement Addendum Section A3 – ‘Approach to Due Diligence and Risk Management’ Section A4 – ‘Measuring Effectiveness’ Section A5 – ‘Training’ Section A6 – ‘Governance’ Section A7 – ‘Improving our statement over time’
5	Describe how the RE assesses the effectiveness of these actions (s16(1)(e))	Part 1: HSBC Group Statement Section 3 – ‘Approach to Due Diligence and Risk Management’ Section 4 – ‘Measuring Effectiveness’ Section 6 – ‘Governance’ Part 2: HSBC Australia Modern Slavery Statement Addendum Section A3 – ‘Approach to Due Diligence and Risk Management’ Section A4 – ‘Measuring Effectiveness’ Section A6 – ‘Governance’

Mandatory Reporting Criteria	Section of Statement
6 Describe the process of consultation with subsidiary entities (if any) (s16(1)(f)(i)-(ii))	<p>Part 1: HSBC Group Statement Section 1 – ‘About HSBC’ Section 6 – ‘Governance’</p> <p>Part 2: HSBC Australia Modern Slavery Statement Addendum Section A1 – ‘About HSBC’ Section A6 – ‘Governance’</p>
7 Provide any other information, considers relevant (s16(1)(g))	Throughout all sections of the statement

