



KYC Registry

Extract of the

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ)

as available on Swift KYC Registry for:

HSBC BANK USA, NATIONAL ASSOCIATION

Office type	Head Office / Subsidiary
BIC	MRMDUS33XXX
LEI	1IE8VN30JCEQV1H4R804
Location	NEW YORK,NY, United States Of America

1.	Full Legal name	HSBC BANK USA, NATIONAL ASSOCIATION
1.	Full Legal name in local language	HSBC Bank USA, National Association
3.	Full Legal (Registered) address	
3.	Building name	Not applicable
3.	Apartment / floor / office number	Not applicable
3.	PO Box	Not applicable
3.	Street name	1800 TYSONS BOULEVARD
3.	Street/house number	SUITE 50
3.	City	TYSONS
3.	Postal / ZIP code	22102
3.	County / Province / State / District	VIRGINIA
3.	Country	United States
4.	Full Primary Business Address (Operating address)	
4.	Building name	Not applicable
4.	Apartment / floor / office number	Not applicable
4.	PO Box	Not applicable
4.	Street name	66 Hudson Boulevard E,
4.	Street/house number	Not applicable
4.	City	NEW YORK
4.	Postal / ZIP code	10001
4.	County / Province / State / District	NEW YORK
4.	Country	United States
5.	Date of incorporation/establishment	31 Mar 2004
6.	Type of ownership	Publicly traded (Wolfsberg DDQ #6a) Member Owned/Mutual (Wolfsberg DDQ #6b) Government or State owned (Wolfsberg DDQ #6c) Privately owned (Wolfsberg DDQ #6d) Other Other
6d.	Optional clarification if privately owned	Not applicable
6d1.	Shareholding entities statement	We confirm that the shareholding entities of the entity are as follows and that no other entity owns or controls directly and/or indirectly 10 % or more of the entity's shares
6d1.	Shareholding entities (threshold 10% mandatory)	
6d1.	Legal name	HSBC North America Holdings Inc.
6d1.	% shares diluted	100
6d1.	Legal name	HSBC Overseas Holdings (UK) Limited
6d1.	% shares diluted	100
6d1.	Legal name	HSBC Holdings plc
6d1.	% shares diluted	100
6d1.	Legal name	HSBC USA Inc.

6d1.	Ultimate Beneficial Owners statement (UBO statement)	We confirm that no natural person controls or owns directly and/or indirectly 10 % or more of the entity's shares
8.	Licence information	
8.	Does the entity, or any of its branches, operate under an offshore banking license (OBL)?	No
9.	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10.	Name of primary financial regulator/supervisory authority	Office of the Comptroller of the Currency
11.	Legal Entity Identifier (LEI)	1IE8VN30JCEQV1H4R804
12.	Full legal name of the ultimate parent, if different from the entity completing the DDQ	HSBC Holdings plc
13.	Jurisdiction of licensing authority and regulator of ultimate parent	HSBC Group is globally supervised in UK by FCA.
14.	Select the business areas applicable to the entity	
14a.	Retail Banking	Yes
14b.	Private Banking	Yes
14c.	Commercial Banking	Yes
14d.	Transactional Banking	Yes
14e.	Investment Banking	Yes
14f.	Financial Markets Trading	Yes
14g.	Securities Services / Custody	Yes
14h.	Broker / Dealer	No
14i.	Multilateral Development Bank	No
14j.	Wealth Management	Yes
14k.	Other	Not applicable
15.	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of it's revenue from non-resident customers? (Non-resident means customers primarily resident in different jurisdiction to the location where bank services are provided.)	Yes
15a.	Provide the top five countries where the non-resident customers are located	Canada,Hong Kong,United Kingdom,Mexico,Cayman Islands
16a.	Number of employees	1001-5000
16b.	Total assets	Greater than \$500 million
17.	Are all answers provided to CBDDQ Questions 1-16b representative of all the legal entity's branches?	No
17a.	Clarify which questions the difference(s) relate to and the branch(es) that this applies to	Answers in this section apply to the HSBC entity and its domestic branches (if any).
18.	Additional information/ context to CBDDQ Question 1 - 16b	Not applicable
19.	Does the Entity offer the following products and services:	
19a.	Correspondent Banking	Yes
19a1a.	Does the entity offer Correspondent Banking services to domestic banks?	Yes
19a1b.	Does the entity allow domestic bank clients to provide downstream relationships?	Yes

19a1d.	Does the entity offer Correspondent Banking services to Foreign Banks?	Yes
19a1e.	Does the entity allow downstream relationships with Foreign Banks?	Yes
19a1g.	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTs)?	Yes
19a1h.	Does the Entity allow downstream relationships with MSBs, MVTs, or Payment Service Provider (PSPs)?	Yes
19a1h1.	MSBs	Yes
19a1h2.	MVTs	Yes
19a1h3.	PSPs	Yes
19b.	Cross-Border Bulk Cash Delivery	No
19c.	Cross-Border Remittances	Yes
19d.	Domestic Bulk Cash Delivery	No
19e.	Hold Mail	No
19f.	International Cash Letter	Yes
19g.	Low Price Securities	No
19h.	Payable through accounts	No
19i.	Payment services to non-bank entities who may then offer third party payment services to their customers?	Yes
19i2.	Third Party Payment Service Providers	Yes
19i3.	Virtual Asset Service Providers (VASPs)	Yes
19i4.	eCommerce Platforms	Yes
19i5.	Other - Please explain	Not applicable
19j.	Private Banking	Both Domestic and International/ Cross Border
19k.	Remote Deposit Capture (RDC)	Yes
19l.	Sponsoring Private ATMs	No
19m.	Stored Value Instruments	No
19n.	Trade Finance	Yes
19o.	Virtual/ Assets	No
19q.	Other high risk products and services identified by the Entity (please specify)	Pouch and FX Spot
19a1c.	Does the entity have processes and procedures in place to identify downstream relationships with domestic banks?	Yes
19a1f.	Does the entity have processes and procedures in place to identify downstream relationships with Foreign Banks?	Yes
19a1i.	Does the Entity have processes and procedures in place to identify downstream relationships with MSBs/ MVTs/ PSPs?	Yes
19 p.	For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence:	
19p1.	Check cashing service	Yes
19p1a.	If yes, state the applicable level of due diligence	Identification and Verification
19p2.	Wire transfers	No
19p3.	Foreign currency conversion	No

19p4.	Sale of Monetary Instruments	No
19p5.	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	HSBC Bank USA, NA will cash checks for non-customers when they are "on-us" checks. Therefore, any check presented by a non-customer drawn on a HSBC Bank USA, NA account shall be cashed. HBUS also offers PUPID (Payable Upon Proper Identification) service
20.	Are all answers provided to CBDDQ Questions 19a-19q representative of all the legal entity's branches?	No
20a.	Clarify which questions the difference(s) relate to and the branch(es) that this applies to	Answers in this section apply to the HSBC entity and its domestic branches (if any).
21.	Additional information/ context to CBDDQ Questions 19a - 19q	HSBC Bank USA, NA provide Pouch and RDC services. Additional clarification to Question CBDDQ 19h: Exceptional approval has been provided to one HSBC Affiliate entity as part of its integration to the HSBC Group after its acquisition in 2023.
22.	Does the entity have a programme that sets minimum AML, CTF & Sanctions standards regarding the following components:	
22a.	Appointed Officer with sufficient experience/expertise	Yes
22b.	Adverse Information Screening	Yes
22c.	Beneficial Ownership	Yes
22d.	Cash Reporting	Yes
22e.	Customer Due Diligence (CDD)	Yes
22f.	Enhanced Due Diligence (EDD)	Yes
22g.	Independent Testing	Yes
22h.	Periodic Review	Yes
22i.	Policies & Procedures	Yes
22j.	PEP Screening	Yes
22k.	Risk Assessment	Yes
22l.	Sanctions	Yes
22m.	Suspicious Activity Reporting	Yes
22n.	Training & Education	Yes
22o.	Transaction Monitoring	Yes
23.	How many full time employees are in the entity's AML, CTF & Sanctions Compliance Department?	101 - 500
24.	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question CBDDQ 29	No
25.	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26.	Does the entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes
26a.	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.

27. Does the entity have a whistle-blower policy? **Yes**
28. Are all answers provided to CBDDQ Questions 22-27 representative of all the legal entity's branches? **Yes**
29. Any additional information/ context to CBDDQ Questions 22-27 **Additional clarification to Question CBDDQ 24: 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 the Group Risk Management Meeting (GRMM), Group Risk Committee (GRC), a sub-committee of the HSBC Holdings PLC Board of Directors.**
- Additionally, HSBC Bank USA, N.A., under the Bank Secrecy Act, is required to have the HSBC North America Holdings Inc./HSBC Bank USA, N.A. Board approve policy on an annual basis, which includes the Global Policy and any market-required uplift policy to comply with regulatory requirements in the US.**
- Additional clarification to Question CBDDQ 25 : The Group Financial Crime Risk Appetite Metrics are reported monthly to the the Group Risk Management Meeting (GRMM) and Group Risk Committee (GRC).**
- In addition, a Financial Crime update by the Group Head of Financial Crime is provided no less than quarterly to the GRMM and GRC.**
- In addition, the Group MLRO publishes an annual report to the GRMM and GRC.**
- Additional clarification to Question CBDDQ 28: HSBC's Global Financial Crime Policy applies globally to HSBC Holdings PLC and its 50% or more owned or controlled legal entities. Where local variations exist to comply with local laws and regulations, the applicable HSBC Entity has published a separate CBDDQ detailing these.**
30. Has the entity documented policies and procedures consistent with applicable ABC regulations and requirements to (reasonably) prevent, detect and report bribery and corruption? **Yes**
31. Does the entity have an enterprise wide programme that sets minimum ABC standards? **Yes**
32. Has the entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme? **Yes**
33. Does the entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme? **Yes**
34. Is the entity's ABC programme applicable to **Both joint ventures and third parties acting on behalf of the entity**
35. Does the entity have a global ABC policy that:
- 35a. Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage **Yes**
- 35b. Includes enhanced requirements regarding interaction with public officials? **Yes**
- 35c. Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity) **Yes**
36. Does the entity have controls in place to monitor the effectiveness of their ABC programme? **Yes**

37. Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme? **Yes**
38. Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months? **Yes**
39. Does the entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment? **Yes**
40. Does the entity's ABC Enterprise Wide Risk Assessment cover the inherent risk components detailed below:
- 40a. Potential liability created by intermediaries and other third-party providers as appropriate **Yes**
- 40b. Corruption risks associated with the countries and industries in which the entity does business, directly or through intermediaries **Yes**
- 40c. Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials **Yes**
- 40d. Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions **Yes**
- 40e. Changes in business activities that may materially increase the entity's corruption risk **Yes**
41. Does the entity's internal audit function or other independent third party cover ABC policies and procedures? **Yes**
42. Does the entity provide mandatory ABC training to:
- 42a. Board and senior committee management **Yes**
- 42b. 1st Line of Defence **Yes**
- 42c. 2nd Line of Defence **Yes**
- 42d. 3rd Line of Defence **Yes**
- 42e. Third parties to which specific compliance activities subject to ABC risk have been outsourced **Not applicable**
- 42f. Non-employed workers as appropriate (contractors/consultants) **Yes**
43. Does the entity provide ABC training that is targeted to specific roles, responsibilities and activities? **Yes**
44. Are all answers provided to CBDDQ Questions 30-43 representative of all the legal entity's branches? **Yes**
45. Any additional information/ context to CBDDQ Questions 30-43 **Additional explanation to Question CBDDQ 34: Entities which are 50%+ owned or controlled are directly subject to the Group Policy. JVs or relevant third parties which are not directly subject to the FC Policy are contractually required to maintain controls to substantially the same standard as that set by the FC Policy.**
- Additional clarification to Question CBDDQ 44: Group Anti Bribery & Corruption Policy applies as a minimum to all HSBC Group Entities globally. Where local variations exist to comply with local laws and regulations, the applicable HSBC Entity (subsidiary or foreign branch) has published a separate CBDDQ detailing these.**
- <https://www.hsbc.com/who-we-are/esg-and-responsible-business/fighting-financial-crime/financial-crime-risk-policies>**
46. Has the entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:

- 46a. Money laundering? **Yes**
- 46b. Terrorist financing? **Yes**
- 46c. Sanctions violations? **Yes**
47. Are the entity's policies and procedures updated at least annually? **Yes**
48. Has the Entity chosen to compare its policies and procedures against:
- 48a. US Standards? **Yes**
- 48a1. Does the entity retain a record of the results? **Yes**
- 48b. EU Standards? **No**
49. Does the entity have policies and procedures that:
- 49a. Prohibit the opening and keeping of anonymous and fictitious named accounts **Yes**
- 49b. Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs **Yes**
- 49c. Prohibit dealing with other entities that provides banking services to unlicensed banks **Yes**
- 49d. Prohibit accounts/relationships with shell banks **Yes**
- 49e. Prohibit dealing with another entity that provides services to shell banks **Yes**
- 49f. Prohibit opening and keeping of accounts for Section 311 designated entities **Yes**
- 49g. 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**
- 49h. Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates **Yes**
- 49i. Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees **Yes**
- 49j. Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk **Yes**
- 49k. Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates **Yes**
- 49l. Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship **Yes**
- 49m. Outline the processes regarding screening for sanctions, PEPs and Adverse Media/ Negative News **Yes**
- 49n. Outline the processes for maintenance of internal "watch lists" **Yes**
50. Has the entity defined a risk tolerance statement or similar document which defines a risk boundary around their business? **Yes**
51. Does the entity have record retention procedures that comply with applicable laws? **Yes**
- 51a. What is the retention period **5 years or more**
52. Are all answers provided to CBDDQ Questions 46-51a representative of all the legal entity's branches? **Yes**

53. Any additional information/ context to CBDDQ Questions 46-51a Additional clarification to Question CBDDQ 48b and 48b1: HSBC entities and subsidiaries located in the European Union review policies and procedures against relevant EU legislation and applies the relevant requirements.
- Additional clarification to Question CBDDQ 52: HSBC's Global Financial Crime Policy applies globally to HSBC Holdings PLC and its 50% or more owned or controlled legal entities. Where local variations exist to comply with local laws and regulations, the applicable HSBC Entity has published a separate CBDDQ detailing these.
54. Does the entity's AML & CTF Enterprise Wide Risk Assessment cover the inherent risk components detailed below:
- 54a. Client Yes
- 54b. Product Yes
- 54c. Channel Yes
- 54d. Geography Yes
55. Does the entity's AML & CTF Enterprise Wide Risk Assessment cover the controls effectiveness components detailed below:
- 55a. Transaction Monitoring Yes
- 55b. Customer Due Diligence Yes
- 55c. PEP identification Yes
- 55d. Transaction Screening Yes
- 55e. Name Screening against Adverse Media & Negative News Yes
- 55f. Training and Education Yes
- 55g. Governance Yes
- 55h. Management information Yes
56. Has the Entity's AML & CTF EWRA been completed in the last 12 months? Yes
57. Does the entity's sanctions Enterprise Wide Risk Assessment cover the inherent risk components detailed below:
- 57a. Client Yes
- 57b. Product Yes
- 57c. Channel Yes
- 57d. Geography Yes
58. Does the entity's sanctions Enterprise Wide Risk Assessment cover the controls effectiveness components detailed below:
- 58a. Customer Due Diligence Yes
- 58b. Governance Yes
- 58c. List Management Yes
- 58d. Management information Yes
- 58e. Name Screening Yes
- 58f. Transaction Screening Yes
- 58g. Training and Education Yes
59. Has the Entity's Sanctions EWRA been completed in the last 12 months? Yes
60. Are all answers provided to CBDDQ Questions 54-59a representative of all the legal entity's branches? Yes
61. Any additional information/ context to CBDDQ Questions 54-59a Additional clarification to Question CBDDQ 60: HSBC's Global Financial Crime Policy, including all supporting Standards and

Appendices, is mandatory and applies globally to HSBC Holdings plc ("HGHC"), and entities where HGHC: (i) ultimately Controls the entity ("HSBC Affiliates"); or (ii) directly or indirectly Owns 50% or more of the shares, voting rights, capital, profits or property (collectively "HSBC Group Entities" or "HSBC"); and to all Staff.

The Global Financial Crime Policy mandate Global Businesses and Functions to conduct an EWRA annually in the form specified by the Group Head of FC or, by delegation, the Group Head of AML and Group Head of Sanctions, enabling a consistent approach to be applied to the EWRA globally.

Where local variations do exist, these are factored in the EWRA through answers to the Country Specific risk section of the EWRA questionnaire. This considers any specific local risks not factored into the standard global approach.

62. Does the entity verify the identity of the customer? Yes
63. 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
64. Which of the following does the entity gather and retain when conducting CDD? Select all that apply:
- 64a. Customer identification Yes
- 64b. Expected activity Yes
- 64c. Nature of business/employment Yes
- 64d. Ownership structure Yes
- 64e. Product usage Yes
- 64f. Purpose and nature of relationship Yes
- 64g. Source of funds Yes
- 64h. Source of wealth Yes
65. Are each of the following identified: 
- 65a. Ultimate Beneficial Ownership Yes
- 65a1. Are ultimate beneficial owners verified Yes
- 65b. Authorised signatories (where applicable) Yes
- 65c. Key controllers Yes
- 65d. Other relevant parties Yes
- . Other type of relevant parties The type of relevant party identified will depend on the customer type e.g. nominee companies; Settlor; Third Parties; Beneficiaries; Trustees etc.
66. What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification? 10%
67. Does the due diligence process result in customers receiving a risk classification? Yes
- 67a. What factors/criteria are used to determine the customer's risk classification?
- 67a1. Product usage Yes
- 67a2. Geography Yes
- 67a3. Business Type / Industry Yes
- 67a4. Legal entity type Yes
- 67a5. Adverse information Yes

67a6.	Other	PEP presence, High risk factors as defined by Country regulatory standards
68.	For high risk non-individual customers, is a site visit a part of your KYC process?	Yes
68a.	If Y, is this at:	
68a1.	On-boarding	Yes
68a2.	KYC Renewal	Yes
68a3.	Trigger event	Yes
68a4.	Other	No
69.	Does the entity have a risk based approach to screening customers for adverse media/negative news?	Yes
69a.	When is it performed?	At on-boarding KYC renewal Trigger event Other
70.	What is the method used by the entity to screen for adverse media/negative news?	Automated Manual Combination of automated and manual Other
71.	Does the entity have a risk based approach to screening customers and connected parties to determine whether they are, or are controlled by PEPs?	Yes
71a.	If Y, is this at:	
71a1.	On-boarding	Yes
71a2.	KYC Renewal	Yes
71a3.	Trigger event	Yes
72.	What is the method used by the entity to screen PEPs?	Automated Manual Combination of automated and manual Other
73.	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
74.	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74a.	If yes "Select all that apply"	
74a1.	Less than one year	Yes
74a2.	1 - 2 years	Yes
74a3.	3 - 4 years	Yes
74a4.	5 years or more	Yes
74a5.	Trigger-based or perpetual monitoring reviews	Yes
74a6.	Other (Please specify)	not applicable
75.	Does the entity maintain and report metrics on current and past due periodic or trigger event due diligence reviews?	Yes
76.	From the list below, which categories of customers or industries are subject to Enhanced Due Diligence (EDD) and/or are restricted, or prohibited by the entity's FCC programme?	
76a.	Arms, defence, military	Always subject to EDD

76b.	Respondent Banks	EDD on a risk based approach
76b1.	Does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76c.	Embassies / Consulates	EDD on a risk based approach
76d.	Extractive industries	EDD on a risk based approach
76e.	Gambling Customers	EDD on a risk based approach
76f.	General Trading Companies	EDD on a risk based approach
76g.	Marijuana-related Entities	Restricted
77.	Provide details of the restriction	Providing products and services is dependent upon a number of factors including but not limited to: the country's laws and regulations and the flow of funds. Will always be subject to EDD.
76h.	MSB/ MVTs customers	EDD on a risk based approach
76i.	Non-account customers	Restricted
77.	Provide details of the restriction	Services that HSBC provides to customers are in-scope of applicable legal and regulatory requirements for appropriate AML controls, e.g. Identification and Verification, screening etc. Remittance Services for Non-Customers (including Occasional Transactions) are prohibited, unless local regulators require the offering of local remittance services
76j.	Non-Government Organisations	EDD on a risk based approach
76k.	Non-resident customers	EDD on a risk based approach
76l.	Nuclear power	EDD on a risk based approach
76m.	Payment Service Providers	EDD on a risk based approach
76n.	PEPs	EDD on a risk based approach
76o.	PEP Close Associates	EDD on a risk based approach
76p.	PEP related	EDD on a risk based approach
76q.	Precious metals and stones	EDD on a risk based approach
76r.	Red light businesses / Adult entertainment	EDD on a risk based approach
76s.	Regulated charities	EDD on a risk based approach
76t.	Shell banks	Prohibited
76u.	Travel and Tour Companies	EDD on a risk based approach
76v.	Unregulated charities	EDD on a risk based approach
76w.	Used Car Dealers	EDD on a risk based approach
76x.	Virtual Asset Service Providers	Restricted
77.	Provide details of the restriction	Entities solely engaged in DACs are generally prohibited per policy. Other VASPs may still be permitted on a risk based approach
76y.	Other (Specify)	Entities or individuals that pose significant reputational risk to HSBC.
78.	Does EDD require senior business management and/or compliance approval?	Yes
78a.	If Y select from:	Senior business management Compliance Both Other
79.	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers,	Yes

	accountants, consultants, real estate agents?	
80.	Does the entity perform an additional control or quality review on clients subject to EDD?	Yes
81.	Are all answers provided to CBDDQ Questions 62 -80 representative of all the legal entity's branches?	Yes
82.	Any additional information/ context to CBDDQ Questions 62-81	<p>Additional clarification to Question CBDDQ 76a: Applicable restrictions: Additional high risk customer classification and due diligence, increased monitoring, customer selection and approval process. https://www.hsbc.com/who-we-are/esg-and-responsible-business/esg-reporting-centre?tab=tab-1</p> <p>Additional clarification to Question CBDDQ 76c: Applicable restrictions: For certain Embassy Relationships, additional high risk customer classification and increased monitoring and approval process applies.</p> <p>Additional clarification to Question CBDDQ 76d: Applicable restrictions: Additional high risk customer classification and due diligence, increased monitoring, customer selection and approval process. https://www.hsbc.com/who-we-are/esg-and-responsible-business/managing-risk/sustainability-risk</p> <p>Additional clarification to Question CBDDQ 76e: Applicable restrictions: Additional high risk customer classification and due diligence, increased monitoring, customer selection and approval process. Unlicensed or unregulated Gambling Operators are prohibited.</p> <p>Additional clarification to Question CBDDQ 76h: Applicable restrictions: Dependent on risk involved and subject to enhanced approval process.</p> <p>Additional clarification to Question CBDDQ 76l: Restrictions will apply where a customer's existing business is inconsistent with IAEA standards or practices listed under HSBC Energy (Sustainability Risk) policy, https://www.hsbc.com/who-we-are/esg-and-responsible-business/managing-risk/sustainability-risk</p> <p>Additional clarification to Question CBDDQ 76m: Applicable restrictions: Dependent on type of PSP, its business profile and risk. All are subject to enhanced approval process.</p> <p>Additional clarification to Question CBDDQ 81: HSBC's Global Financial Crime Policy applies globally to HSBC Holdings PLC and its 50% or more owned or controlled legal entities. Where local variations exist to comply with local laws and regulations, the applicable HSBC Entity has published a separate CBDDQ detailing these.</p>
83.	Does the entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84.	What is the method used by the entity to monitor transactions for suspicious activities?	<p>Automated</p> <p>Manual</p> <p>Combination of automated and manual</p> <p>Other</p>
84a.	What types 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, with select small markets for certain lines of business may rely on manual monitoring in the form of exception reports or manual Red Flag processes.
84b.	Are internal system or vendor-sourced tools used?	<p>Internal System</p> <p>Vendor-sourced tools</p> <p>Both</p> <p>Other</p>
84b1.	If "vendor-sourced tool" : What is the name of the	Commercially sensitive information

	vendor/tool?	
84b2.	When was the tool last updated?	< 1 year
84b3.	When was the automated Transaction Monitoring application last calibrated?	< 1 year
85.	Does the entity have regulatory requirements to report suspicious transactions?	Yes
85a.	Does the entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86.	Does the entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87.	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88.	Does the entity have processes in place to respond to Request for Information (RFIs) from other entities in a timely manner?	Yes
89.	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
90.	Are all answers provided to CBDDQ Questions 62 -89 representative of all the legal entity's branches?	Yes
91.	Any additional information/ context to CBDDQ Questions 62 - 89	Additional information on Questions CBDDQ 84b2 and 84b3: HSBC TM platforms include in-house built / maintained systems, vendor procured systems and components that are a mix of both which are regularly updated. Also, there is a change process established to enable the ongoing calibration of the TM applications. Additional clarification to Question CBDDQ 90: HSBC's Global Financial Crime Policy applies globally to HSBC Holdings PLC and its 50% or more owned or controlled legal entities. Where local variations exist to comply with local laws and regulations, the applicable HSBC Entity has published a separate CBDDQ detailing these.
92.	Does the entity adhere to the Wolfsberg Group Payment Transparency Standards?	Yes
93.	Does the entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93a.	FATF Recommendation 16	Yes
93b.	Local Regulations	Yes
93b1.	Which regulation?	Please see publicly available US Code of Conduct: https://www.about.us.hsbc.com/investor-relations/hsbc-usa
94.	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95.	Does the Entity have controls to support the inclusion of required beneficiary in cross border payment messages?	Yes
95a.	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96.	Are all answers provided to CBDDQ Questions 94 - 95a representative of all the legal entity's branches?	Yes
97.	Any additional information/ context to CBDDQ Questions 94 - 95a	Additional clarification to Question CBDDQ 95a: When provided with beneficiary address information, HSBC will include it in the outgoing payment message, to the extent

possible

Additional clarification to Question CBDDQ 96: HSBC's Global Financial Crime Policy applies globally to HSBC Holdings PLC and its 50% or more owned or controlled legal entities. Where local variations exist to comply with local laws and regulations, the applicable HSBC Entity has published a separate CBDDQ detailing these.

98.	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
99.	Does the entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100.	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
101.	Does the entity screen its customers, including beneficial ownership information collected by the entity, during onboarding and regularly thereafter against Sanctions Lists? ...	Yes
102.	What is the method used by the entity for the sanctions screening process?	Automated Manual Both Automated and Manual Other
102a1.	Are internal system or vendor-sourced tools used?	Internal System Vendor-sourced tools Both Other
102a1a.	If a vendor-sourced tool: What is the name of the vendor/tool?	Commercially sensitive information.
102a2.	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool?	< 1 year
103.	Does the entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104.	What is the method used by the entity for the sanctions screening process?	Automated Manual Combination of automated and manual Other
105.	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106.	What are the sanctions lists used by the entity in its sanctions screening processes?	
106a.	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
106b.	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
106c.	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data

- 106d. European Union Consolidated List (EU) Used for screening customers and beneficial owners and for filtering transactional data
- 106e. Lists maintained by other G7 member countries Used for screening customers and beneficial owners and for filtering transactional data
- 106f. Any other sanctions list used by the entity in its sanctions screening process? Screening customers and transactions globally against the sanctions lists issued by the UN, UK and US.
- Lists 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.
107. When regulatory authorities make updates to their Sanctions list, how many business days before the Entity updates their active manual and/or automated screening systems against:
- 107a. Customer Data Within 3 to 5 business days
- 107b. Transactions Within 3 to 5 business days
108. 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
109. Are all answers provided to CBDDQ Questions 98 -108 representative of all the legal entity's branches? Yes
110. Any additional information/ context to CBDDQ Questions 98 - 108 Additional clarification to Question CBDDQ 101: Ongoing and daily screening on Customers and Connected parties is performed on delta changes.
- Additional clarification to Question CBDDQ 102: There are a small number of instances where manual screening of Customers is undertaken (subject to governance being in place (e.g. Dispensation or Local Financial Crime Policy)) but generally screening is undertaken at onboarding and periodically using an automated screening solution.
- Additional clarification to Question CBDDQ 102a2: Effectiveness testing is completed monthly by assurance teams. In addition, the automated tools are subject to extensive testing by an independent testing function on a periodic basis.
- Additional clarification to Question CBDDQ 104: There are a small number of instances where manual screening of Customers is undertaken (subject to governance being in place (e.g. Dispensation or Local Financial Crime Policy)) but generally screening is undertaken at onboarding and periodically using an automated screening solution.
- Additional clarification to Question in CBDDQ106d: 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. Where local variations exist to comply with local laws and regulations, or to manage material financial crime risk, the applicable HSBC Group Entity has published a separate CBDDQ detailing these.

Additional clarification to Question CBDDQ 106e: Lists issued by relevant competent authorities in the UK (e.g. HMT's OFSI) and the US (e.g. OFAC) are screened against customers and transactions globally. Lists issued by the relevant competent authorities in the remaining G7 countries (Japan, Canada, France, Italy and Germany) are screened only in the applicable jurisdictions."

Additional clarification to Question CBDDQ 109: HSBC's Global Financial Crime Policy applies globally to HSBC Holdings PLC and its 50% or more owned or controlled legal entities. Where local variations exist to comply with local laws and regulations, the applicable HSBC Entity has published a separate CBDDQ detailing these.

t11.	Does the entity provide mandatory training, which includes:	
t11a.	Identification and reporting of transactions to government authorities	Yes
t11b.	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
t11c.	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
t11d.	New issues that occur in the market, e.g.. significant regulatory actions or new regulations	Yes
t11e.	Conduct and Culture	Yes
t11f.	Fraud	Yes
t12.	Is the above mandatory training provided to:	
t12a.	Board and senior committee management	Yes
t12b.	1st Line of Defence	Yes
t12c.	2nd Line of Defence	Yes
t12d.	3rd Line of Defence	Yes
t12e.	Third parties to which specific Financial Crime Compliance activities have been outsourced	Yes
t12f.	Non-employed workers (contractors/consultants)	Yes
t13.	Does the entity provide AML, Sanctions & CTF training that is targeted to specific roles, responsibilities and HR products, services and activities?	Yes
t14.	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
t14a.	If Y, how frequently is training delivered?	Annually
t15.	Are all answers provided to CBDDQ Questions t11 - t14a representative of all the legal entity's branches?	Yes
t16.	Any additional information/ context to CBDDQ Questions t11 - t14a	Additional clarification to Question CBDDQ 115: HSBC's Global Financial Crime Policy applies globally to HSBC Holdings PLC and 50% or more owned or controlled legal entities. Where local variations exist to comply with local laws and regulations, the applicable HSBC Entity has published a separate CBDDQ detailing these.

Additional clarification to Question CBDDQ 114a: All employees receive annual mandatory financial crime learning. Employees that are more likely to be exposed to money laundering risk (high risk roles) receive additional targeted training appropriate to their role.

117. Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate to the independent Audit function)? **Yes**
118. Does the entity have a programme wide risk based and independent Quality Assurance or Compliance Testing process (separate to the independent Audit function)? **Yes**
119. Are all answers provided to CBDDQ Questions 117 - 118 representative of all the legal entity's branches? **Yes**
120. Any additional information/ context to CBDDQ Questions 117 - 118 **Additional clarification to Question CBDDQ 119: HSBC's Global Financial Crime Policy applies globally to HSBC Holdings PLC and 50% or more owned or controlled legal entities. Where local variations exist to comply with local laws and regulations, the applicable HSBC Entity has published a separate CBDDQ detailing these.**
121. 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**
122. How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:
- 122a. Internal Audit Department **Component based reviews**
- 122b. External Third Party **Yearly**
123. Does the internal audit function or other independent third party cover the following areas:
- 123a. AML, CTF, ABC, Fraud and Sanctions policy and procedures .. **Yes**
- 123b. Enterprise Wide Risk Assessment **Yes**
- 123c. Governance **Yes**
- 123d. KYC/CDD/EDD and underlying methodologies **Yes**
- 123e. Name Screening & List Management **Yes**
- 123f. Reporting/Metrics & Management Information **Yes**
- 123g. Suspicious Activity Filing **Yes**
- 123h. Technology **Yes**
- 123i. Transaction Monitoring **Yes**
- 123j. Transaction Screening including for Sanctions **Yes**
- 123k. Training & Education **Yes**
- 123l. Other area **N/A**
124. Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness? .. **Yes**
125. Are all answers provided to CBDDQ Questions 121 - 124 representative of all the legal entity's branches? **Yes**
126. Any additional information/ context to CBDDQ Questions 121 - 124 **Additional clarification to Question CBDDQ 125: HSBC's Global Financial Crime Policy applies globally to HSBC Holdings PLC and 50% or more owned or controlled legal entities. Where local variations exist to comply with local laws and regulations, the applicable HSBC Entity has published a separate CBDDQ detailing these.**
127. Does the Entity have policies in place addressing fraud risk? **Yes**
128. Does the Entity have a dedicated team responsible for preventing & detecting fraud? **Yes**
129. Does the Entity have real time monitoring to detect fraud? **Yes**
130. **Yes**

Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?

131. Are all answers provided to CBDDQ Questions 127 - 130 representative of all the legal entity's branches? **Yes**

132. Any additional information / context to CBDDQ Questions 127-130 **The above answers (CBDDQ 127-130) have been provided based on the Group Policy, which sets the minimum standard. Local variations may apply in line with local policies or regulations, where these require a higher standard to be applied.**



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Declaration Statement

Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4)
Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)

HSBC USA USA National Association _____ (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts.

The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations.

The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.

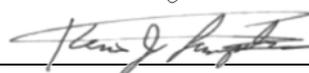
The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.

The Financial Institution commits to file accurate supplemental information on a timely basis.

I, Jason R Henderson _____ (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

I, Kevin J Lampeter _____ (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.

 _____ 3/5/2026 (Signature & Date)

 _____ 2/27/2026 (Signature & Date)