

Anti-slavery and Human Trafficking Transparency Statement

July 2023

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Anti-slavery and Human Trafficking Transparency Statement

This statement is made by HSBC Innovation Bank UK Limited (registered in England and Wales under No. 12546585) (**HSBC Innovation Bank UK**) in accordance with the Modern Slavery Act 2015. It is made in respect of HSBC Innovation Bank UK's financial year ending 31 December 2022 and sets out the steps we have taken to prevent slavery and human trafficking in any part of our supply chains or business. This statement will be reviewed and updated annually for publication after each financial year.

Organisational structure

HSBC Innovation Bank UK is owned by HSBC UK Bank plc following an acquisition which took place on 13 March 2023. In 2022, it was a wholly-owned subsidiary of Silicon Valley Bank, the banking subsidiary of SVB Financial Group Inc.

HSBC Innovation Bank UK

HSBC Innovation Bank UK is authorised as a bank by the Prudential Regulation Authority and the Financial Conduct Authority and provides financial services to businesses across the technology and innovation landscape in the UK, including loans, deposits, cash management products and foreign exchange management.

Commitment to combat slavery and human-trafficking

HSBC Innovation Bank UK is committed to acting as a responsible and ethical employer and is strongly opposed to any form of slavery or human trafficking.

As a financial service provider to the technology and innovation community HSBC Innovation Bank UK believes that there is limited risk of slavery or human trafficking taking place in our supply chain. However, we recognise that some of our global vendor relationships and supply chains have contact points with higher risk geographies. We are committed to furthering our efforts to prevent slavery or human trafficking throughout our business and supply chain as part of the transition to the HSBC Group following the acquisition of HSBC Innovation Bank UK in March 2023.

Vendor Ethics

HSBC Innovation Bank UK is dedicated to uncompromising integrity in all that it does and how it relates to its internal employees and to people outside HSBC Innovation Bank UK.

As part of HSBC Innovation Bank UK's ongoing vendor due diligence programme, all vendors are subject to periodic checks including a review of supply chains for material vendors. Various data points are leveraged including adverse media reporting, sanctions screening and country risk reports to help mitigate the risk of HSBC Innovation Bank UK partnering with a vendor who does not share our high standards and working practices.

Clients

HSBC Innovation Bank UK has in place robust and detailed client due diligence standards and monitoring processes to help ensure that it can monitor suspicious behaviours and report them to law enforcement agencies as required. HSBC Innovation Bank UK's Financial Crime team review both new and existing clients by monitoring relationships for areas of risk or concern and by conducting media screenings for any adverse reports and ongoing transaction monitoring. HSBC Innovation Bank UK's policy is to escalate any cases which give us cause for concern from a human rights or modern slavery perspective, leading to further investigation to the Financial Crime team. During 2022, HSBC Innovation Bank UK had no instances of suspicious activity which indicated labour exploitation in its client relationships or account activity.

Employees

REPORTING

HSBC Innovation Bank UK has a Code of Conduct and all employees are expected to exhibit the highest standards of ethical conduct and are encouraged to identify and report violations of any kind.

Employees have a number of clear reporting avenues by which concerns or violations can be reported, including the ability to make anonymous and confidential reports via HSBC Innovation Bank UK's EthicsPoint service. All reports are taken seriously and are promptly investigated. It is HSBC Innovation Bank UK's policy that no one may retaliate against any employee who provides information about possible violations. During 2022 no reports concerning human rights violations or modern slavery concerns were made to HSBC Innovation Bank UK, either directly or through EthicsPoint.

MINIMUM WAGE

HSBC Innovation Bank UK is proud to continue its accreditation with the Living Wage Foundation, joining over 7000 employers in the UK by ensuring that all of its employees and contractors within the UK are paid more than the London Living Wage.

TRAINING

All HSBC Innovation Bank UK employees undergo mandatory annual compliance training appropriate to their role covering a range of topics including vendor risk assessments, anti-bribery and corruption and whistleblowing. HSBC Innovation Bank UK employees are encouraged to take responsibility and demonstrate integrity in calling out any potential wrongdoing.

This statement was approved by HSBC Innovation Bank UK on 20 June 2023.



Erin Platts

Chief Executive Officer, HSBC Innovation Bank UK