

SME Undertakings - HSBC UK Bank plc's Action Plan

| Item | Action | Target completion date |
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| Annual reminder and statement of policy to staff | | |
| 1 | Issue written annual reminder to all Relevant Staff | First annual reminder to be issued by 28 April 2022 Text of written reminder to be provided to the CMA by 12 May 2022. |
| 2 | Review of all internal manuals, guidance, product/loan documentation and associated training materials for communication to all staff to ensure compliance with Clause 4.5 | 31 July 2022 |
| Staff training and assessment of staff knowledge of the Undertakings | | |
| 3 | 2022 staff training deployed pursuant to obligations under the 2014 Directions | By 23 April 2022 |
| 4 | Prepare and assign suitable annual Training on compliance with the Undertakings to all Relevant Staff | By 23 April 2023 |
| 5 | Prepare and assign a formal assessment to all Relevant Staff | By 23 April 2023 |
| Appointment of an Independent Body and Initial Assurance Engagement | | |
| 6 | Appointment of an Independent Body to carry out an Initial Assurance Engagement in relation to matters relating to HSBC UK's compliance with the Undertakings, the 2014 Agreement and the 2014 Directions (scope to be agreed with the CMA) | Recommendation of an Independent Body to be made to the CMA within two calendar months of Directions being issued and appointment of Independent Body within 10 working days of CMA approval of HSBC UK's recommendation |

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*This Action Plan may be subject to such change as requested by or agreed with the CMA from time to time.

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| Further assurance engagement by an Independent Body | | |
| 7 | Appointment of an Independent Body to carry out a Subsequent Assurance Engagement of HSBC UK's compliance with the Undertakings and the 2022 Directions and to monitor the implementation of any Recommended Steps that may emerge from such Subsequent Assurance Engagement. | Timing to be determined by the Independent Body in its Report on the Initial Insurance Engagement. |
| Communications to all SME customers with a BCA | | |
| 8 | Communication to SME customers who hold a BCA to inform them of the existence of the full range of obligations in the Undertakings and highlighting the CMA's key messaging. | Within 12 months following the date of the Directions being issued |
| 9 | To contact any SME customer that has been identified (through the Initial Assurance Engagement, Subsequent Assurance Engagement or any Annual Review under clause 1 of the 2014 Agreement) as affected by a failure to comply with Clause 17 of the Undertakings in order to advise that the SME customer is under no requirement to maintain its BCA with HSBC in order to retain a loan or business deposit account that fall within the scope of the Undertakings, save where exemptions apply. | Timing to be determined following HSBC UK's receipt of the relevant Report or completion of the relevant Annual Review, as applicable. |