



Additional Restrictions

The information regarding possible restrictions, in addition to situations provided for in clause 5.23 of General Terms and Conditions of Opening and Maintaining Bank Accounts with HSBC Bank Polska S.A., on Instructions placed by Clients of the Bank, which the Bank has the right to refuse to execute.

HSBC Sanctions Policy Statement

HSBC Sanction Policy takes into account among others sanctions laws and regulations imposed by the United Nations and sanctions being in force the European Union, Hong Kong, the United Kingdom, and the United States, as well as applicable sanctions laws and regulations in other jurisdictions in which HSBC operates.

HSBC's Global Sanctions Policy defines the minimum standards which all HSBC Group entities must consider when providing services to clients, including:

- screening customers/clients and transactions globally against the sanctions lists issued by the United Nations, the European Union, the United Kingdom, the United States (OFAC) and Hong Kong.
- screening locally against other sanctions lists that apply to HSBC's operations in a particular jurisdiction.
- refusing commencing or continuing customer relationships or providing products or services or facilitating transactions that HSBC believes may violate applicable sanctions laws or HSBC's Global Sanctions Policy. This includes individuals or entities named on a sanctions list or activity, directly or indirectly, involving countries or territories subject to comprehensive sanctions. As at October 2016, these countries and territories include Cuba, Iran, North Korea, Sudan, Syria and the Crimea region.
- refusing or restricting business activity involving, directly or indirectly, countries or persons subject to more selective or targeted sanctions programmes. These restrictions impact not only the types of products or services that HSBC may make available but also the types of transactions HSBC may process. As at October 2016 the country programmes include Belarus, Zimbabwe and Ukraine/Russia.
- investigating all customer/client alerts or transactions that are stopped in HSBC's screening systems. While HSBC seeks to investigate these alerts and transactions in a reasonable timeframe, compliance with applicable sanctions laws or HSBC's Global Sanctions Policy may result in delays to the processing of customer transactions while additional due diligence is conducted and information obtained on the nature of the underlying transaction or the parties involved.
- blocking or rejecting transactions where HSBC is required to do so under applicable sanctions laws or regulations or HSBC's Global Sanctions Policy. Transactions may also be returned by HSBC where they fall outside of HSBC's risk appetite.
- reporting breaches of sanctions laws to the relevant regulatory authority. This may include any attempt by a customer to evade sanctions laws.

HSBC may agree to process certain transactions, in its sole discretion, such as those which relate to humanitarian aid or which are otherwise permitted by a license from an appropriate authority. These transactions will be considered on a case-by-case basis and must be submitted in advance to HSBC for consideration and approval.

HSBC may, in its sole discretion, also decide not to process transactions, provide products or services or otherwise facilitate transactions even where permitted by applicable sanctions laws and regulations where these activities fall outside of HSBC's risk appetite