

Independent Limited Assurance Report to the Directors of HSBC Holdings plc

 HSBC Holdings plc (“HSBC”) engaged us to provide limited assurance on the information described below for the year ended 30 September 2021 and set out in HSBC’s Annual Report and Accounts 2021.

Our conclusion

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the Subject Matter Information for the year ended 30 September 2021 has not been prepared, in all material respects, in accordance with the Reporting Criteria.

This conclusion is to be read in the context of what we say in the remainder of our report.

Subject Matter Information and Reporting Criteria

The scope of our work was limited to assurance over the external reporting over CO₂ emissions for the 12 months to 30 September 2021, as set out in the table below, and on page 52 of HSBC’s Annual Report and Accounts 2021 (the “Subject Matter Information”).

Subject Matter Information	Value (tonnes)
Scope 1 - CO ₂ e emissions	22,000
Scope 2 - CO ₂ e emissions (location based)	386,000
Scope 2 - CO ₂ e emissions (market based)	307,000
Scope 3 - CO ₂ e emissions (business travel only)	12,000

HSBC’s reporting guidelines for measuring, recording and reporting the Subject Matter Information (the “Reporting Criteria”) are set out in HSBC CO₂ Emissions - Reporting Guidance 2021, dated September 2021, available in Appendix A.

Our assurance does not extend to information in respect of earlier periods or to any other information included in HSBC’s Annual Report and Accounts and website¹.

Professional standards applied and level of assurance

We performed a limited assurance engagement in accordance with International Standard on Assurance Engagements 3000 (Revised) ‘Assurance Engagements other than Audits or Reviews of Historical Financial Information’ and, in respect of the greenhouse gas emissions, in accordance with International Standard on Assurance Engagements 3410 ‘Assurance engagements on greenhouse gas statements’, issued by the International Auditing and Assurance Standards Board.

Our Independence and quality Control

We complied with the Institute of Chartered Accountants in England and Wales (ICAEW) Code of Ethics, which includes independence and other requirements founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour, that are at least as demanding as the applicable provisions of the International Ethics Standards Board for Accountants (IESBA)’s International Code of Ethics for Professional Accountants (including International Independence Standards).

We apply International Standard on Quality Control (UK) 1 and accordingly maintain a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Understanding reporting and measurement methodologies

The Subject Matter Information reported by HSBC needs to be read and understood together with the Reporting Criteria, which HSBC is solely responsible for selecting and applying. The absence of a significant body of established practice on which to draw to evaluate and measure emissions allows for different, but acceptable, measurement techniques and can affect comparability between entities and over time.

Inherent Limitations with the Subject Matter Information

Non-financial performance information is subject to more inherent limitations than financial information, given the characteristics of the subject matter and the methods used for determining such information. The precision of different measurement techniques may also vary. It is anticipated that the principles and methodologies used to measure and report the Subject Matter will develop over time and may be subject to change in line with market practice and regulation, impacting comparability year-on-year.

Work done

We are required to plan and perform our work in order to consider the risk of material misstatement of the Subject Matter Information might arise. In doing so, we:

- made enquiries of HSBC’s management and those with responsibility for governance, management and reporting;
- considered the suitability in the circumstances of HSBC’s use of the Reporting Criteria as the basis for preparing the Subject Matter Information;
- understood and evaluated the design of the key structures, systems, processes and controls for managing, recording and reporting the Subject Matter Information. This included analysing a number of sites, selected on the basis of their inherent risk and materiality to the group, to understand the key processes and controls for reporting site performance data to the group team;
- performed limited substantive testing on a selective basis of the Subject Matter Information, at corporate head office, and in relation to nine sites, including:
 - agreeing reported data to internal and external sources, for example, invoices, expense data and emissions factors; and
 - recalculation of emissions figures based on underlying data.
- considered the disclosure and presentation of the Subject Matter Information.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

HSBC’s responsibilities

HSBC management are responsible for:

- designing, implementing and maintaining internal controls over information relevant to the preparation of the Subject Matter Information that is free from material misstatement, whether due to fraud or error;
- establishing objective Reporting Criteria for preparing the Subject Matter Information;
- measuring and reporting the Subject Matter Information based on the Reporting Criteria; and
- the content of HSBC’s Annual Report and Accounts 2021 and Sustainability section of the website¹.

Our responsibilities

We are responsible for:

- planning and performing the engagement to obtain limited assurance about whether the Subject Matter Information is free from material misstatement, whether due to fraud or error;
- forming an independent conclusion, based on the procedures we have performed and the evidence we have obtained; and
- reporting our conclusion to the Directors of HSBC.

This report, including our conclusions, has been prepared solely for the Board of Directors of HSBC in accordance with the agreement between us dated 24 November 2021 (the “agreement”), in order to assist the Directors in reporting HSBC’s scope 1, 2 and 3 CO₂e emissions. We permit this report to be disclosed at the website¹, to assist the Directors in responding to their governance responsibilities by obtaining an independent assurance report in connection with the Subject Matter Information.

To the fullest extent permitted by law, we do not accept or assume responsibility or liability to anyone other than the Board of Directors and HSBC for our work or this report except where terms are expressly agreed between us in writing.



PricewaterhouseCoopers LLP
Chartered Accountants
London
22 February 2022

¹The maintenance and integrity of HSBC website (<https://www.hsbc.com/who-we-are/esg-and-responsible-business/esg-reporting-centre>) is the responsibility of HSBC; the work carried out by us does not involve consideration of these matters and, accordingly, we accept no responsibility for any changes that may have occurred to the reported Subject Matter Information or Reporting Criteria when presented on HSBC’s website.

HSBC CO₂e Emissions

Reporting Guidance 2021

This CO₂e Emissions Reporting Guidance ("CERG") document supports the preparation and reporting of greenhouse gas (GHG) emissions data by HSBC Holdings plc (hereafter "HSBC"). It is the responsibility of HSBC management to ensure that appropriate procedures are in place to prepare its GHG reporting in accordance with the CERG. HSBC has:

- designed, implemented and maintained internal controls and processes over information relevant to the measurement and preparation of carbon emissions data that is free from material misstatement, whether due to fraud or error;
- established objective reporting criteria (i.e. CERG) for measuring, preparing and reporting the carbon emissions data and applied them consistently;
- presented information, including the criteria, in a manner that provides relevant, reliable, comparable and understandable information; and
- measured and reported the carbon emissions data based on this reporting criteria.

General Reporting Principles

In preparing this guidance document consideration has been given to following principles:

- Information Preparation – to highlight to users of the information the primary principles of relevance and reliability of information;
- Information Reporting – the primary principles are comparability / consistency with other data including prior year and understandability / transparency providing clarity to users.

Reporting Scope

Since 2013, HSBC's annual data is prepared for the 12 month period to 30 September in accordance with internal reporting timelines. Carbon emission data comprises carbon dioxide arising from:

- Energy used in commercial buildings, vehicles and other forms of transport owned or leased by HSBC and used for business purposes. By applying an emission uplift rate, energy used in residential building is also accounted for. This includes 100% of emissions from the assets of joint ventures or alliances where HSBC has management control¹;
- Emissions arising from off-shored operations where HSBC retains control over the outsourced operation via contractual agreement; and
- Other business travel including air; rail; taxi; hire car. By applying an emission uplift rate, elements of boat; bus/coach; ferry/junk; tram; and other travel are also included.

Carbon dioxide emissions from acquisitions and disposals are included and terminated respectively from the date of contractual completion of the transfer of asset ownership/ leasehold. This is consistent with HSBC's financial reporting. For acquisitions, where data are not available: estimates are prepared for additions which contribute more than 5% of the Reporting Unit (i.e. country level) annual data.

Reporting levels are defined on the basis of the percentage of Full Time Equivalent Employee (FTE) as at 30 September (reporting year runs from 1 October to 30 September). A scale up calculation is made on the basis of the FTE coverage rate to account for any missing data component (typically less than 10% of FTE). In addition, emissions uplift rates are applied to allow for uncertainty on quality and coverage of emissions measurement and estimation. The uplift rates are: 4% for electricity, 10% for other energy, and 6% for business travel, based on IPCC Good Practice Guidance and Uncertainty Management in National Greenhouse Gas Inventories and HSBC's own internal analysis of data coverage and quality.

Carbon dioxide emission reporting excludes emissions from investments (including loans to third party organisations), employee commuting (except where HSBC provides this service in its Global Technology Centers and Global Service Centers) and other third party sources.

¹ Management control: where HSBC Group or its member has full authority to implement the Group environmental policy and where there is control of facilities management.



Carbon dioxide is the main type of greenhouse gas applicable to our operations. While the amount is immaterial, our current reporting also incorporates methane and nitrous oxide for completeness as CO₂e factors were used wherever available.

Further details on the preparation of emissions reported are presented below.

Data preparation

Property

Data are reported for electricity, primary fuel sources and locally generated energy sources on a quarterly basis, with energy consumption data where possible are obtained via meters and collated from the service provider invoices. Where metered data are only partially available or not available, energy consumption may be calculated on the basis of a comparable property, extrapolation of cost per unit or estimates using floor area or other published industry baselines.

Travel

For air and rail travel, actual data are obtained from the business travel service agents on a quarterly basis and reviewed for completeness. Where journey details are not available, estimates of distance travelled are based on the cost of an average journey or by extrapolating from a single month of travel. Where tickets are ordered on a local basis through a travel company an estimated distance of the journey may be made by the traveler/claimant. For independent bookings the estimate of distance travelled is based on the cost of an average journey.

Road travel is measured by direct measurement of journeys made for business purposes. Details of road journeys, including distances travelled, engine size of vehicle and fuel type are submitted as part of expense claims/invoices or from the fleet providers. This may include company vehicles, personal/private vehicles and hire vehicles. Where only cost data are available, an estimate of distances travelled can be calculated on a local basis. Where journey data are not available, previously recorded data or industry baseline data may be used. In some rare instances, it is impossible to split the business travel from the personal travel for company cars. In this situation, the personal travel is included in our reporting. Road data is obtained on a quarterly basis to feed the carbon accounting reporting.

Conversion factors

Conversion factors enable determination of the amount of carbon dioxide released into the atmosphere per unit of energy consumption. Different types of energy source and modes of travel have different conversion factors reflecting the carbon intensity.

Governance

All data received is reviewed by the relevant local team prior to submission into the Group reporting system. Following submission, it is further reviewed by the Group Reporting Team to confirm the accuracy, completeness and reliability of the data submitted. This detailed check is based on levels of significance and materiality. Queries are raised, with local teams, where an error, omission or variance exceeds 5% of the Reporting Unit total against same quarter from previous year for the overall parameter (e.g. total greenhouse gas emissions) or 1% of the Group total.

Energy - Scope 1

Scope 1 emissions are calculated using 2021 factors provided by the Department for Business, Energy and Industrial Strategy (BEIS) for each primary fuel source.

Travel - Scope 1

Scope 1 emissions are calculated using 2021 factors provided by the Department for Business, Energy and Industrial Strategy (BEIS) for each engine type of own and leased cars.

Energy - Scope 2

HSBC reports energy emissions under the location and market basis introduced by the revised scope 2 guidance of the GHG protocol. HSBC has reviewed the revised Greenhouse Gas Protocol Scope 2 Guidance and has worked with service providers in 2021 to integrate the revised GHG Protocol Scope 2 Guidance into HSBC's reporting methodology to enable HSBC to report using both location based and market based methodologies.

Market Based

For market based emissions reporting, HSBC applies the following hierarchy of emission factors:

1. Factors provided by electricity attribute certificates or equivalent instruments;
2. Factors provided by contracts for electricity, such as power purchase agreements (PPAs).
3. Factors provided by energy suppliers
4. Factors provided by the Association of Issuing Bodies (AIB) for the residual mixes in Europe - Version 1.0, 2021-05-31



5. Other grid-average emission factors (subnational or national),
6. Factors provided by the International Energy Agency (IEA) - 2020 edition of the Emission factors.

Location Based

For location based emission reporting; HSBC applies the following hierarchy of emission factors:

1. Regional or subnational emission factors
2. National production emission factors,
3. Factors provided by the International Energy Agency (IEA).

Travel – Scope 3

For travel, emissions are calculated using 2021 factors provided by the Department for Business, Energy and Industrial Strategy (BEIS). For air travel, in 2021 we have updated our reporting methodology specially related to air travel emissions including the cabin seating class and the radiative forcing factors for short haul and long haul (distances greater than 3,700 km). Our 2019 baseline for the Net Zero strategy has been updated for air travel, and includes the cabin seating class and the impact of the radiative forcing.

Only travel emissions are reported under the Scope 3 emissions from HSBC's operations.

Guidance on the use of conversion factors, including the most recent factors released by the IEA and BEIS is issued internally annually.

Prior year adjustments

The measuring and reporting of carbon emissions data inevitably involves a degree of estimation. In exceptional circumstances restatements of prior year reported emissions and offset data may be required. Restatements are considered where there is a change in the data and/or in the data collection or preparation that will have material impact on the total emissions and/or offset at Group level.