

Please be advised that we have sent the below notice letter to applicable customers.

HSBC Global Asset Management (Japan) K.K.
Richard Gardner
Chief Operating Officer Japan

Sharing of Customer Information amongst HSBC Group Companies (Compliance Purposes)

This Letter explains how we will share certain customer information amongst HSBC Group Companies, including HSBC Japan Companies. Please see the following for further details.

"HSBC Group Company/ies" means HSBC Holdings plc, and/or any of, its affiliates, subsidiaries, associated entities and any of their branches and offices (together or individually).

"HSBC Japan Company/ies" means The Hongkong and Shanghai Banking Corporation Limited, Japan branches, HSBC Securities (Japan) Limited, and/or HSBC Global Asset Management (Japan) K.K. (together or individually).

Background for Sharing your Information for Compliance Purposes amongst HSBC Group Companies

HSBC Group Companies, including HSBC Japan Companies, in common with the financial services industry generally, faces strengthening regulatory and legal obligations designed to combat financial crime. We take our obligations very seriously not just in this country but globally, as financial crime is often international in its nature. This means that we comply with laws and regulations, and work with regulatory, judicial and other authorities in various countries, to detect and prevent financial crime, such as money laundering, terrorist financing, fraud, corruption and tax evasion.

In order to do this, when we provide you with banking and financial services we would like to share amongst HSBC Group Companies certain information about you, your HSBC accounts and transactions with us, and others connected with your business. However, you may request us to suspend such information sharing (Opt-out) at any time pursuant to Article 153(2) of the Cabinet Office Ordinance on Financial Instruments Business, etc.

If clients have separately entered into individual confidentiality agreements with any HSBC Group

Company, the relevant confidential information will continue to be managed in accordance with the terms of such agreements.

Any consents or authorisations that you have already provided or will subsequently provide in relation to customer information (collectively, "**Information Sharing Consents**") shall continue to apply or shall apply in full force and effect, to the extent permissible by applicable local law. For the avoidance of doubt, this Letter, the other terms and conditions, and Information Sharing Consents shall be construed in such manner to the fullest extent possible so that the collection, use and sharing of customer information permissible under any of them by HSBC Group Companies shall be cumulative and shall not be prejudiced or restricted by one another.

Details of Information Sharing by This Letter

We will share amongst HSBC Group Companies certain information about you by this Letter in accordance with the following details.

1. Scope of information to be shared

Non-Public Information as defined below.

"**Non-Public Information**" means non-public information including "non-public information (*hi kokai joho*)" as defined in Article 1(4)(xii) of the Cabinet Office Ordinance on Financial Instruments Business, etc. of either you or your connected person (including the group to which you belong, any substantial owner, controlling person, representative, director or officer of you, and any agent, any beneficiary, trustee or settler of you), which has been and will be obtained during the course of each HSBC Group company's operations.

2. Scope of companies which share Non-Public Information

HSBC Group Companies including HSBC Japan Companies.

3. Method of sharing Non-Public Information amongst HSBC Group Companies

Non-Public Information will be shared orally, in writing, via e-mail, through access to a shared database or through any other permissible means of information sharing.

4. Method of controlling Non-Public Information at HSBC Group Companies

HSBC Group Companies will take necessary steps, in accordance with applicable laws and group policies/procedures regarding information protection, to prevent Non-Public Information from being used for non-permitted purposes or being accessed improperly.

5. Purposes for the use of Non-Public Information

HSBC Group Companies will use Non-Public Information for the following purposes:

- (1) Meeting Compliance Obligations; and
- (2) Conducting Financial Crime Risk Management Activities.

"Compliance Obligations" means obligations of HSBC Group Companies to comply with: (a) Laws (including those requiring verification of the identity of customers and those imposing certain reporting or disclosure), (b) any demand and/or request from competent authorities over HSBC Group Companies (including that demanding and/or requesting certain reporting or disclosure), (c) international guidance and (d) internal policies or procedures (including those in connection with verification of the identity of customers or customer due diligence) relating to the foregoing matters.

"Financial Crime" means money laundering, terrorist financing, bribery, corruption, tax evasion, fraud, evasion of economic or trade sanctions, and/or violations of, or acts or attempts to circumvent or violate, any laws and regulation relating to these matters.

"Financial Crime Risk Management Activity" means any action which HSBC Group Companies consider appropriate to meet Compliance Obligations in connection with the detection, investigation and prevention of Financial Crime.

"Laws" means any applicable local or foreign statute, law, regulation, ordinance, rule, judgment, decree, voluntary code, directive, sanctions regime, court order, agreement between an HSBC Group Company and an authority, or agreement or treaty between authorities and applicable to HSBC Group Companies.

6. Request for suspension of sharing of Non-Public Information (Opt-out)

If you have requested any of HSBC Japan Companies to suspend sharing of Non-Public Information amongst HSBC Group Companies (Opt-out), each of HSBC Japan Companies will not share with other HSBC Group Companies Non-Public Information which HSBC Japan Companies would obtain after such request.

However, we may share such Non-Public Information where it is permitted under applicable law or Information Sharing Consents. Sharing of Non-Public Information which is permitted under applicable law includes:

- (a) Information sharing for conducting internal control and operations (legal, compliance, risk management concerning loss, internal audit and internal inspection, finance, accounting, tax, and settlement and related operations of securities, derivatives and other transactions).

(b) Information sharing in accordance with laws, etc.

Further, with respect to Non-Public Information that has been shared amongst HSBC Group Companies and is stored in common-use databases and other information repositories, we will continue to retain such information in accordance with the control mentioned in paragraph 4 (*Method to control Non-Public Information at HSBC Group Companies*) and continue to use such information for the purposes mentioned in paragraph 5 (*Purposes for the use of Non-Public Information*).

For us to comply with regulatory and legal obligations designed to combat financial crime and to provide you with better banking and financial services, your understanding of the necessity of sharing of customer information amongst HSBC Group Companies would be appreciated.

For any specific questions or comments regarding sharing of customer information, please contact your usual HSBC business representative.