

**Mortgage Enhancements
HSBC North America Holdings, Inc.
HSBC Finance Corporation
Action Plan Response to FRB Consent Order
Training**

November 16, 2011

Section 9: Training

Article 11, 11(a), 11(b)

FRB Order Reference:	<i>Article 11</i>	Corresponding OCC Article:	<i>IV.1.p</i>
<i>Within 60 days of this Order, HBIO shall submit to the Reserve Bank an acceptable written plan, and timeline for implementation, to improve the training of all appropriate officers and staff of the Mortgage Servicing Companies regarding the Legal Requirements, supervisory guidance of the Board of Governors, and the Mortgage Servicing Companies' internal policies and procedures regarding residential mortgage loan servicing, Loss Mitigation, and foreclosure, and the policies and procedures adopted regarding a single point of contact described in paragraph 5 of this Order. The plan shall also include:</i>			
FRB Order Reference:	<i>Article 11(a)</i>	Corresponding OCC Article:	<i>N/A</i>
<i>A requirement that training be conducted and documented no less frequently than annually; and</i>			
FRB Order Reference:	<i>Article 11(b)</i>	Corresponding OCC Article:	<i>N/A</i>
<i>procedures to timely inform appropriate officers and staff of any new or changes to the Legal Requirements and supervisory guidance of the Board of Governors related to residential mortgage loan servicing, Loss Mitigation, or foreclosure.</i>			
Action Plan			
<p>HBIO and HBUS have training in place for personnel involved in Residential Mortgage Loan Servicing and foreclosure processes and operations, including collections, Loss Mitigation, and loan modification, to ensure compliance with applicable Legal Requirements and supervisory guidance. In addition, as referenced below, in April 2011, HBIO and HBUS engaged North America HR Learning (“Learning”) to enhance foreclosure training, as required by the Order. HBIO and HBUS will continue to develop new training courses to remain in compliance with the Order.</p> <p><i>On-the-job Coaching vs. Training</i></p> <p>HSBC defines two categories of “training” methods. The first training method is informal, on-the-job coaching, which occurs on an ad-hoc basis, and is identified, developed, and implemented by the business without leveraging the Learning process. For example, training materials are developed and training is conducted outside of the Learning process (which is discussed below) by the Skill Qualification Training (“SQT”) team. The SQT team is a support function within the business that reports up through the President and CEO of the Servicing Company, and is dedicated to enhancing employee skill sets by creating and delivering on-the-job coaching. On-the-job coaching does not have the formal structure and does not typically have the formal evaluations/assessments/tracking as the training facilitated</p>			

by the Learning team.

The second method of training is the training facilitated by the Learning team, which is monitored and tracked in the [REDACTED] ([REDACTED] All Design, Delivery and Maintenance requests made to the Learning Team from the business line or function for support to create learning are managed via a demand management intake process with compliance initiatives receiving the highest priority. For training to be facilitated by the Learning team, the learning material must contain the following elements (Reference slide 6 of the attached “North America HR Learning Organization”):

- Overview of learning material with associated laws and regulations
- Relevant internal policy and procedures
- Applicable system and tool information
- Potential risks associated with failure to comply with relevant policies and procedures
- Practical application to the employee’s role
- Knowledge assessment of the learning material presented

Structure of North America HR Learning Organization

The North America HR Learning team is a functional department organized within the Human Resources division. Learning is a branch of the Learning, Training, Resourcing and Organizational Development (“LTROD”) group within HR. As a centralized function, Learning provides support for all business lines and functions within North America with a pool of Learning employees and contains various roles within its structure (approximately 85 employees).

The Regional SVP Head of Learning reports to the Regional EVP Head of LTROD. The Regional EVP Head of LTROD reports to the SEVP North America Head of HR. There are also dotted line reporting relationships into HSBC Global HR and Learning Structure, based in the UK.

The Learning team is comprised of employees within the following key roles:

- Design Project Managers (“DPM”) - Responsible for the management of individual learning projects, day-to-day project activities, service delivery and editorial standards. DPM’s partner with learning specialists and business stakeholders on assigned projects and build project and resourcing plans.
- Instructional Designers (“ID”) – Responsible for conducting learning needs analysis, and further outline and structure the learning content for Instructor Led Training (“ILT”) (face-to-face and virtual), Web Based Training (“WBT”), job aids, reference guides and blended solutions. These individuals consult on the learning solution design and development, and build learning assessments.
- Developers – Translate and structure learning content for web-based training and other training not conducted in person. Developers troubleshoot content related issues in the [REDACTED] commonly referred to as “[REDACTED]”

- ([REDACTED] and the [REDACTED])
- Learning Facilitation – Provide subject matter expertise to the design team during training design and development efforts and further conduct instructor led and virtually led classroom function training and Leadership and Professional skills development training.

Training Development Process Overview

The Learning Design team, a function within the Learning team, as well as contracted vendors, are tasked with designing and developing functional training modules. At each stage in the design process, feedback and approval are requested from designated Subject Matter Experts (“SMEs”) and stakeholders (process owners, Compliance, Legal, etc.) to ensure that the course is developing in alignment with expectations. Throughout this process, Compliance and the requesting business(es) provide subject matter expertise and input into the design. HR Learning is responsible for the facilitation and oversight of training within the business. (Refer to slides 3-10 of “North America HR Learning Organization” for additional details regarding the organization, design and delivery of the North America HR Learning Organization).

Review and final sign-off of learning material is obtained from the functional Senior Vice President(s) within the business as well as Legal and Compliance teams. Content development includes Assistant Vice President and Vice President level business personnel that assist with defining business processes, and Compliance to ensure materials cover applicable regulatory requirements as outlined in the [REDACTED] ([REDACTED] Training review cycles are integrated throughout the Learning process to ensure the business, Legal, and Compliance have the opportunity to review and provide feedback for training materials. As a part of the Learning process, Legal and Compliance approval is obtained prior to launch. Legal and Compliance feedback supersedes business feedback. Learning is responsible for resolution of any conflicting feedback amongst the parties involved by coordinating meetings amongst the business unit(s), Legal and Compliance and discussing until a resolution is reached.

Detailed Training Design Steps

As summarized in the previous section, Learning follows a standard process for training creation and approval. The specific steps are noted below and also documented in detail in slides 9 – 11 of “North America HR Learning Organization”:

- Analysis Phase
 - Confirm learning solution and approve Terms of Reference
 - Identify project team and time commitments for team
 - Project plan timeline defined
 - Content SMEs engaged: Business participants, Compliance, and Legal
 - Business representative will review and provide feedback

- Design Phase
 - Validate the Content Outline by compiling the learning points from the source documents/business
 - Define Learning Objectives and Sequences, content and timing
 - Course Owner validates/approves learning objectives, sequence, content and timing
 - Defines success measurement
 - Design Document shows instruction methods
 - Final sign-off received from the business representative
 - Delivery Guide, Leader Guide and supplemental materials drafted
 - Dry-Run and/or Pilot performed. (Due to time constraints and/or learning complexity, Dry-Run and Pilot activities may be combined)
 - Dry-Run: Given to stakeholders and SMEs identified from the project and the business. Generally does not include business participants and is used to assess content, lessons, exercise/activities and additions and changes that will need to be made to the Learning Guide
 - Pilot: Generally facilitated by the Delivery team. Pilot target learners to be determined by the project team and business stakeholders. Target learners engaged in the pilot program will provide feedback/review and suggestions for adjustments to the learning activity. Business participants are typically included in this session.
 - Edits will be made to learning content based upon Dry-Run and Pilot feedback
 - Stakeholders and Compliance/Legal review and sign off on the learning activity. Business representative validates/approves.
- Development Phase
 - Post Pilot activities
 - Designer applies pilot feedback to final documents.
 - Business and Compliance/Legal reviews again for final sign off and approval
 - Delivery prepares and rehearses their instruction
 - Train the Trainer: Certification for modules
- Implementation (Note: These steps may be performed by Learning or the business as appropriate)
 - Communication
 - Scheduling
 - Launch the training
 - Request reports

Identification of Legal and Regulatory Changes

Management has a process in place to identify, communicate and implement changes to Legal Requirements and supervisory guidance into its business practices. The Regulatory Monitoring & Assessment (“RMA”) manages the regulatory monitoring and

change management process in order to facilitate compliance with the applicable Legal Requirements and Board of Governors supervisory guidance (See HSBC North America New Laws and Regulations Procedure – US). This procedure provides guidelines for monitoring and tracking regulatory changes and updating processes appropriately.

In its efforts to identify and communicate changes in applicable laws, rules, and regulations, the RMA group performs the following activities (among others):

- Monitor and track new and changed laws, regulations, and regulatory guidance;
- Track legislative, judicial, and regulatory developments, to identify potential emerging compliance risks;
 - Various sources for monitoring are utilized including, but not limited to: the Federal Register; regulatory agency websites (e.g., OCC, FRB, FDIC); trade associations; monitoring services; and various law firm websites
- Complete business impact analysis for new or changed regulatory requirements; and;
- Communicate new legislative alerts to appropriate Residential Mortgage Servicing departments for action

The RMA group collaborates with Legal and Compliance to determine the applicability of the legislation, rule or regulation and the business areas impacted. If it is determined that there is an impact to a business area, the RMA group outlines the detailed requirements in an Impact Assessment document, which it then forwards to Legal for review. The RMA group and Compliance, together with the impacted business area, determine the impact to the business. The RMA then publishes an executive summary, which is called the New Legislation Alert (which includes the Impact Assessment), and distributes it to the impacted business areas. The impacted business areas work with the Law Change Working Group (“LCWG”), Compliance Officers, and Legal (as appropriate), to update the policies, procedures and processes. The LCWG is comprised of multiple representatives from various functional areas responsible for identifying updates in legal requirements and alerting the business of necessary changes as well as monitoring the progress of these changes until implementation.

Communication/Training Related to Legal and Regulatory Changes

When policy and/or procedure updates are made, communication of any operational changes to employees is performed within the business by the business management, as well as via a Breaking News channel where procedural updates are electronically communicated via [REDACTED]

[REDACTED] ([REDACTED])

In addition to the communication of procedural changes, the impacted business area works with the LCWG, Compliance Officers and Legal (as appropriate) to ensure

implementation of any legal changes by the effective date of the change. The significance of the legal change to day-to-day business operations and the scope of the business impact will determine the method of communication and/or training needed for employees. (Note: this is not a formal process and is based on business management's review of the significance of the change). Communication and/or training to the business may be conveyed in one of the following ways:

- Informally, by on-the-job coaching or "whiteboard sessions" – Incorporated into team meetings as necessary and created/distributed by the line of business without Learning's involvement
- Formally documented and communicated via information deck created and distributed by the business as on-the-job training/coaching without Learning's involvement
- Through training developed in conjunction with the Learning process outlined above. When Learning is engaged to conduct formal training, Compliance representation and feedback are required to assist in the creation of functional training courses and materials to ensure adherence to current Legal Requirements. All training material requires Business, Compliance and Legal approval. In addition, the Learning team will collaborate with the business and the LCWG to define stricter governance around the ownership and maintenance of the execution of change to existing training modules when appropriate.

Mandatory and non-Mandatory Training

HBIO and HBUS have both mandatory and non-mandatory training courses. A Mandatory Training Calendar is provided (see tab "CML (Including AutoTFS)" of the attached "2011 Mandatory Training Calendar") for compliance topics such as Anti Money Laundering, Fair Lending, FDCPA, for all Residential Mortgage Servicing employees. All training is housed and tracked in [REDACTED]. Courses are classified based upon the role of the employee as either mandatory or non mandatory based on direction from the requesting party (e.g. primarily Compliance, business owner and/or legal as appropriate), and in either case, tracking is available via the [REDACTED]. Reporting is available on a bi-weekly basis, and [REDACTED] provides managers with access to view and monitor mandatory training completions for their direct reports..

Mandatory Operational Training Remediation Process

While managers are ultimately accountable for the completion of training within their departments or functions, the following Training Remediation Process has been proposed to address failure of employees to comply with mandatory training requirements. Finalization and publication of this process is scheduled for October 31, 2011, with a scheduled implementation date of December 31, 2011. Employees are required to successfully complete training specific to the department in which they work on an annual basis. Courses are delivered in either a WBT or ILT format. WBT courses are accessed through [REDACTED] and consist of online content with an assessment at the conclusion of the course. ILT course consists of classroom style attendance and passing an online assessment. For both WBT and ILT courses

individual certification requires the successful completion the course and passing the online assessment with at least an 80% grade. Employees failing to successfully complete the annual training requirements with the timelines below will be subject to disciplinary action up to and including termination.

- Failure of certification testing on the first attempt requires coaching assistance by the manager which may include support from other areas such as SQT. Employee must retest within 10 calendar days.
- Failure of certification testing on the second attempt requires the employee be placed on final written corrective action, the manager coaching, and the employee must retest within 10 calendar days.
- Failure of certification testing on the third attempt results in employee termination for failure to perform the roles and responsibilities of the job.

NOTE: The employee's immediate manager is responsible for ensuring follow up testing occurs within the required 10 calendar days

NOTE: If the 10th calendar day falls on a weekend, holiday, or previously scheduled TOP day, testing must occur the following business day.

Examples of current mandatory trainings include compliance courses such as:

- Fair Debt Collections Practices Act
- Fair Lending
- Anti-Money Laundering
- Ethics Awareness and Certification
- Security Awareness and Privacy Data

Examples of non-mandatory courses include;

- The Power of Coaching
- Developing High Performing Teams
- Leading through Change
- Foundations of Communicating for Success

New hire functional training exists in Collections and Customer Care phone teams, which was developed and is delivered by the Learning team. In the future, functional training developed and administrated by Learning will be available to new and existing employees and the content will not differ. HBIO and HBUS have expanded functional training to include areas such as Foreclosure, Loss Mitigation, and Mortgage Servicing. The proposed functional training will be both mandatory and non-mandatory and will be driven by job responsibilities. For example, Foreclosure training will be mandatory for Foreclosure personnel on an annual basis. Foreclosure Training is not mandatory for employees performing Escrow duties, but is optional and participation will be encouraged to further educate our workforce. The Learning team is working to centralize training courses for Loss Mitigation, as this is currently handled informally by the Skill Qualification Training ("SQT") team.

Reporting

Currently, reporting for mandatory compliance training activities (Refer to “2011 Mandatory Training Calendar”) is housed in ██████████ HSBC’s North America Reporting tool. Data is refreshed in ██████████ weekly, and is available at any time for business review. Managers are responsible for ensuring all staff is trained in accordance with established training plans, and Managers can review staff statuses via ██████████. Additionally, standard messages are sent as follows:

- System generated messages advising of mandatory courses to complete and timeline to complete are sent to the employee weekly starting 28 days before completion date
- Manual notifications from Central Services (function that helps facilitate reporting for various pieces of the company and ultimately reports through the Compliance function) advising of the course to complete and timeline to complete support the completion of compliance training at various points in time:
 - To direct manager – one week before completion date and on due date
 - To direct manager / Copy Local Compliance Officer (“LCO”) (Global Career Band 3 (“GCB3” or “SVPs”)) – 2 weeks prior to completion date
 - To business leads/LCOs/Regional Compliance Officers (“RCO”) – 2 weeks after due date

HBIO and HBUS will leverage the existing framework for the proposed functional training and will have dedicated resources within HR for tracking and monitoring reports outlining attendance and results. Results will be reported and provided to the functional Senior Vice President in the business.

General Mortgage Training

HSBC servicing employees will be required to take two general mortgage courses, “Life of the loan training” and “Terminology and regulations training.” Key topics covered in the “Life of the loan training” include but are not limited to: key loan documents, mortgage types, title, escrow, collections, default and mortgage serving, modifications, where each department fits in, and customer impact. Key topics covered in the “Terminology and regulations training”, include but are not limited to: federal regulations such as RESPA, SCRA, as well as industry terminology such as SPOC and Short Sale. (For a summary of these two courses, refer to slide 4 of “CML Consent Order Response Recommendations from Learning”).

Loss Mitigation Training Modules

HBIO and HBUS have several business-developed Loss Mitigation training modules in place for Residential Mortgage Servicing personnel. These modules are primarily voluntary, instructor-led sessions offered to both new hires and as on-going training. Additionally, web-based training sessions are offered to qualify for certifications. To date, the primary Loss Mitigation training modules are Collections Call Model training

and instruction for the HBIO loan modification tool. The Collections Call Model training prepares employees to interface with customers involved in the Loss Mitigation process. Loan modification tool training helps employees navigate the Foreclosure Avoidance Program (“FAP”), the primary technology used for modifications.

Foreclosure Training

In April 2011, HBIO and HBUS engaged Learning to enhance foreclosure training, to comply with the requirements of the Order. Affidavit Processing Training and Notary Training were developed and are included in this Action Plan submission. The Affidavit Processing documents are titled “Foreclosure Learning Activity – Specialized Affidavit and Document Processing” and “Foreclosure Learning Activity – Specialized Affidavit and Document Processing (for instructors)”. The Affidavit Processing Training documents outline the process to accurately execute a foreclosure affidavit, which is one part of the overall foreclosure process. There are twelve (12) Notary Training materials included in this Action Plan submission. The Notary training materials describe state law requirements when acting as a Notary Public and outline the responsibilities and high-level process of acting as a Notary on behalf of HSBC. Trainings for Affidavit Processing and Notary were executed as of the end of the third quarter of 2011.

New Training Created within the Learning Process

HSBC finalized the content for two additional new training modules, Foreclosure Introduction and Foreclosure Processing. The content for the additional two training modules include the basics of foreclosures and foreclosure processing. The table below indicates the dates each of these training sessions were completed, as well as make-up session completion dates.

Training Sessions			
Date	Class	Location	Type
July 11	Foreclosure Overview	Florida	ILT
July 11	Foreclosure Processing	Florida	ILT
July 12	Foreclosure Overview	Florida	ILT
July 12	Foreclosure Processing	Florida	ILT
July 14	Foreclosure Overview	Illinois	ILT
July 14	Foreclosure Processing	Illinois	ILT
Make-up Sessions			
Date	Class	Location	Type
September 13	Foreclosure Overview	Illinois	WebEx

See below materials for additional detail for the Foreclosure Introduction and Foreclosure Processing modules:

- Foreclosure Overview July 2011
- Foreclosure Overview Delivery Guide
- Foreclosure Overview Learner Guide
- Foreclosure Training Foreclosure Processing
- Foreclosure Processing Delivery Guide
- Foreclosure Processing Learner Guide
- Foreclosure Processing Assessment Questions
- CML Consent Order Response Recommendations from Learning
- Foreclosure Training Test Results 7-28-11

Each module has a learning assessment to ensure comprehension of materials. Learning supplies a manual report for each class taken and the corresponding assessment score. It is the responsibility of the business to monitor for compliance, and the previously mentioned Training Remediation Process may be implemented when appropriate.

In addition, HSBC conducted an evaluation of its mandatory compliance and business function courses as of July 31, 2011 (Please reference “Learning & Development Functional Training Gap Assessment” for a draft summary of the evaluation provided). This evaluation outlined enhancements necessary to adhere to compliance with applicable Legal Requirements and supervisory guidance. In accordance with this evaluation, Learning developed an execution plan for new or enhanced training programs (Refer to slides 6-7 of “CML Consent Order Response Recommendations from Learning”). The evaluation concluded that HSBC needed to develop a total of 18 courses, each of which may be composed of multiple modules.

Per the evaluation of HSBC’s mandatory compliance and business function courses, HBIO and HBUS have developed or are developing 18 training courses for other areas of mortgage services and default, with various dates for design and deployment as noted in on slides 6-7 of “CML Consent Order Response Recommendations from Learning” and as outlined below:

Course	Estimated Start / Complete Design	Estimated Start/Complete Deployment
Foreclosure	COMPLETE August 2011	COMPLETE August 2011
SPOC	September – December 2011	January 2012

Loss Mitigation – Modification, Retention and Exit Strategy	September – December 2011	January 2012
Foreclosure Review	September – December 2011	January 2012
Bankruptcy	September – December 2011	January 2012
Mortgage Servicing – SCRA	October – December 2011	December 2011
Business Record Training	October – December 2011	January 2012
Records Management – Note Validation	October – December 2011	December 2011
MERS	October – December 2011	December 2011
Imaging	November – January 2012	February 2012
Invoice Processing – Fees, Expenses and Costs	November – January 2012	February 2012
Collections	December – March 2012	March 2012
REO	January – March 2012	April 2012
Charge Off & Lien Release	January – March 2012	April 2012
Payment Processing	January – March 2012	June 2012
Escrow	February – June 2012	June 2012
Customer Service	March – June 2012	June 2012
Mortgage Servicing – Special Loans, Payoffs, Research	March – May 2012	June 2012

New Trainings Created Outside of the Learning Process

In addition to the trainings noted above, two trainings were developed in response to the Order which did not go through the Learning process due to the need for an accelerated delivery to comply with the Order and business needs. The trainings did, however, go through appropriate levels of internal review as noted below.

The current SPOC training program was developed separately from the Learning

team, within the business by an Assistant Vice President and Vice President. Approval of the materials was completed by the Senior Vice President, Default Management and Compliance personnel, and was also reviewed by Learning to ensure adherence to current Legal Requirements.

The SPOC training program was designed for employees who are part of the SPOC operating model. This classroom curriculum includes a SPOC Overview, specific SPOC processes and procedures, and SPOC system tools that are used by the SPOC Agent. SPOC agents completed training from July 1, 2011, through September 12, 2011, with make-up sessions completed as of September, 30, 2011 (See SPOC Database Training, Single Point of Contact SPOC General, Single Point of Contact SPOC Queue Owner, SPOC Database Training General, SPOC Certification Training for additional details on the SPOC training program). By December 2011, SPOC training will be transitioned to the Learning team, which will provide enhanced materials, technology for attendance tracking and other features. Until the December transition, SPOC training will continue to be managed by the business. SPOC training has been established based on the current processes, procedures, and other key elements of the SPOC program and will be revised and/or supplemented in the event changes to the SPOC program are made. Additionally, SPOC agents will be required to complete SPOC training again should changes be made to the SPOC training modules (as necessary).

Additionally, Business Records Training was developed separately from the Learning team with input from the business, outside counsel, legal and compliance. By January 2012, Business Records Training will be transitioned to the Learning team, and will be administered by either web based or instructor led training courses (Please see the attached Business Records Training and Business Records Training Summary for additional details on this training program). Until this transition to the Learning team has occurred, the business will continue to take responsibility for the training.

Included below is a summary of the aforementioned existing processes and required enhancements are a result of the Order:

Existing Processes	Required Enhancements
<ul style="list-style-type: none"> • Web-based, instructor-led, and function-specific training programs covering Loss Mitigation, foreclosure and parts of Residential Mortgage Loan Servicing processes for both new-hire and on-going training for existing employees • Developed training modules for affidavit and notary processes that are tracked, monitored and certified on an annual basis 	<ul style="list-style-type: none"> • Continue to develop and implement foreclosure training and Loss Mitigation modules that will be tracked, monitored and certified on an annual basis • Create and implement additional default and mortgage servicing training that will be tracked, monitored and certified on an annual basis

- Transition SPOC and Business Records trainings to Learning

Documents to be submitted with the Action Plan

- Collections Call Model Training
- Business Records Training
- Business Records Training Summary
- Notary Requirements and Responsibilities (Florida) Assessment Questions
- Notary Requirements and Responsibilities (Florida) Delivery Guide
- Notary Requirements and Responsibilities (Florida) Foreclosure Training
- Notary Requirements and Responsibilities (Florida) Learner Guide
- Notary Requirements and Responsibilities (Illinois) Assessment Questions
- Notary Requirements and Responsibilities (Illinois) Delivery Guide
- Notary Requirements and Responsibilities (Illinois) Foreclosure Training
- Notary Requirements and Responsibilities (Illinois) Learner Guide
- Notary Requirements and Responsibilities (New York) Assessment Questions
- Notary Requirements and Responsibilities (New York) Delivery Guide
- Notary Requirements and Responsibilities (New York) Foreclosure Training
- Notary Requirements and Responsibilities (New York) Learner Guide
- Foreclosure Learning Activity - Specialized Affidavit and Document Processing
- Foreclosure Learning Activity - Specialized Affidavit and Document Processing (for instructors)
- Learning and Development Functional Training Gap Assessment

Additional documents completed for re-submission of Action Plan

- North America HR Learning Organization
- 2011 Mandatory Training Calendar
- HSBC North America New Laws and Regulations Procedure – US
- Foreclosure Overview July 2011
- Foreclosure Overview Delivery Guide
- Foreclosure Overview Learner Guide
- Foreclosure Training Foreclosure Processing
- Foreclosure Processing Delivery Guide
- Foreclosure Processing Learner Guide
- Foreclosure Processing Assessment Questions
- CML Consent Order Response Recommendations from Learning
- Foreclosure Training Test Results 7-28-11
- SPOC Database Training
- Single Point of Contact SPOC General
- Single Point of Contact SPOC Queue Owner
- SPOC Database Training General
- SPOC Certification Training

Key HSBC Contacts for the Action Plan

- [REDACTED] SVP Strategy, Operational Risk Management and Chief Information Risk Officer, HBIO
- [REDACTED] SVP Default Services

