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#### **Details of Filing**

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Registry:	BANK AUSTRALIA LIMITED ACN 006 434 162 VICTORIA REGISTRY - FEDERAL COURT OF AUSTRALIA	



Sia Lagos

Registrar

#### **Important Information**

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Form 17 Rule 8.05(1)(a)

## **Statement of Claim**

		No.	of 2024
Fed	eral Court of Australia		
Dist	rict Registry: Victoria		
	sion: General		
DIVI			
Aus	stralian Securities and Investments Commission		Plaintiff
HSE	3C Bank Australia Limited (ACN 006 434 162)		Defendant
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	6161392 ed on behalf of (name & role of party) The Plaintiff. Australian Securities and	Investments Con	nmission

Filed on behalf of (name & role of party)The Plaintiff, Australian Securities and Investments CommissionPrepared by (name of person/lawyer)Fred Prickett & JK MuckersieLaw firm (if applicable)Clayton UtzTel0404 318 400 / 0410 531 730Fax03 9629 8488Emailfprickett@claytonutz.com / jmuckersie@claytonutz.comAddress for serviceEmail addresses above and Level 18, 333 Collins Street, Melbourne VIC 3000(include state and postcode)Email addresses above and Level 18, 333 Collins Street, Melbourne VIC 3000

[Form approved 01/08/2011]

E.3 SIGNIFICANT, WIDESPREAD OR SYSTEMIC NON-COMPLIANCE WITH THE EPAYMENTS **CODE 37** F. SYSTEMS AND PROCESSES FOR BLOCKING AND REINSTATING BANKING SERVICES 39 F.1 F.2 SYSTEMIC AND WIDESPREAD DELAYS IN REINSTATING ACCESS TO BLOCKED G BREACHES OF CORPORATIONS ACT AND CREDIT ACT ...... 46 FAILURE TO HAVE ADEQUATE CONTROLS FOR THE DETECTION AND PREVENTION OF G.1 G.2 G.3 Η. 

## A. THE PARTIES

- 1 The plaintiff (ASIC) is:
  - (a) a body corporate under s 8(1)(a) of the Australian Securities and Investments Commission Act 2001 (Cth) (the ASIC Act); and
  - (b) entitled to commence and maintain this proceeding in its corporate name under s 8(1)(d) of the ASIC Act.
- 2 The defendant (**HSBC Australia** or **HBAU**) is and was at all times during the **Relevant Period** (1 January 2020 to 30 November 2024):
  - (a) a corporation duly incorporated;
  - (b) liable to be sued in its corporate name;

- (c) the holder of Australian Financial Services Licence (AFSL) and Australian Credit Licence (ACL) numbered 232595;
- (d) a financial services licensee within the meaning of s 9 (since 20 October 2023) and s 761A (until 19 October 2023) of the *Corporations Act 2001* (Cth) (the **Corporations Act**);
- (e) carrying on a financial services business in Australia within the meaning of s 911D of the Corporations Act;
- (f) a licensee within the meaning of the *National Consumer Credit Protection Act 2009* (Cth) (**Credit Act**);
- (g) an authorised deposit taking institution for the purposes of the Banking Act 1959 (Cth) (ADI);
- (h) a wholly owned subsidiary of HSBC Holdings plc;
- a member of the HSBC group of companies comprising HSBC Holdings plc and its subsidiaries (HSBC Group);
- (j) a 'subscriber' to the ePayments Code being relevantly the 2016 ePayments Code and the 2022 ePayments Code (as defined in paragraph 13 below); and
- (k) a signatory to the Banking Code of Practice (Banking Code), being relevantly the 2020 Banking Code and the 2019 Banking Code (as defined in paragraph 17 below).

### B. HSBC AUSTRALIA'S BANKING FACILITIES

#### **B.1** Products and services offered by HSBC Australia to Customers

- 3 At all material times, HSBC Australia's AFSL authorised it, among other things, to deal in a financial product including in respect of deposit and payment products including:
  - (a) basic deposit products;

- (b) deposit products other than basic deposit products; and
- (c) non-cash payment products.
- 4 At all material times, HSBC Australia's ACL authorised it to engage in credit activities including as a credit provider within the meaning of s 6 of the Credit Act, including:
  - (a) carrying on a business of providing credit, being credit the provision of which the National Credit Code, being Schedule 1 to the Credit Act (National Credit Code), applies to; and/or
  - (b) being a credit provider under a credit contract.
- 5 During the Relevant Period, HSBC Australia offered its account holders in its Wealth and Personal Banking (**WPB**) business (**Customers**):
  - (a) financial products, including transaction, offset, savings, and term deposit accounts (**Deposit accounts**); and
  - (b) credit contracts, including home loans, personal loans and credit card accounts (Loan accounts).
- 6 Each of the Deposit accounts:
  - (a) was a facility through which, or through the acquisition of which, a person makes non-cash payments within the meaning of s 763D of the Corporations Act;
  - (b) was a deposit-taking facility made available by an ADI in the course of its banking business; and
  - (c) was a financial product with the meaning of s 763A(1) and s 764A(1)(i) of the Corporations Act.
- 7 Each of the Loan accounts was a credit contract with the meaning of s 5 of the Credit Act and s 4 of the National Credit Code.

ASIC relies on the statutory presumption in section 13 of the National Credit Code.

- 8 During the Relevant Period, HSBC Australia provided its Customers the functionality to make and receive payments, including to third parties, using methods including:
  - (a) online banking through an Internet browser (**Online Banking**); and
  - (b) mobile banking though an HSBC-branded mobile banking application on a mobile device (Mobile Banking).

### B.2 Risk of Unauthorised Payments

- 9 By reason of the matters pleaded in paragraphs 5 to 8 above, Customers were exposed to the risk of third-parties, through forgery or account compromise (including by social engineering):
  - (a) obtaining access to their Online Banking or Mobile Banking (Digital Access) (or both); and
  - (b) making payments from the Customers' Deposit accounts or Loan accounts (or both) to unintended parties, without the Customer's authority,

### (Unauthorised Payments).

- 1. The risk of Unauthorised Payments using Digital Access was identified in:
  - a. the HSBC Group's Fraud Classification and Reporting Standard dated 24 November 2020 [BCB.1000.0001.0252] (Fraud Classification and Reporting Standard) which was updated from time to time and used by HSBC Australia during the Relevant Period, including in HSBC Australia's Payment Fraud Investigation Procedure Instruction Manual dated 8 February 2022;

- b. the Fraud Classifications and Reporting Specifications Support Pack dated 15 February 2023 [HBA.0001.0001.1032].
- The Fraud Classification and Reporting Standard defined Unauthorised Payments as "Payment instructions to unintended parties via forgery of authorities or account compromise. This includes cases related to social engineering to harvest credentials", and from at least February 2023, as "including but not limited to phishing, smishing and vishing" [HBA.0001.0001.1395].
- The Fraud Classification and Reporting Standard included the following fraud typologies for Unauthorised Payments through Digital Access:
  - a. **Token Reactivation:** Fraudster socially engineers a customer to provide token reactivation codes which enable the fraudster to link their device to the Customer's account and make fraudulent Unauthorised Payment(s).
  - b. **Smishing:** Fraudster socially engineers a customer into revealing sensitive information such as Online Banking or Mobile Banking login credentials via a text/SMS message, with the purpose of making unauthorised fraudulent payment(s) from customer accounts.
  - c. **Remote Access:** Fraudster socially engineers a customer to give them remote control over their computer or device, and to login to their Online Banking or Mobile Banking. Once logged in, the fraudster uses the remote access to make fraudulent payments.
  - d. **Malware**: Fraudster installs malicious software to harvest sensitive information, such as login credentials, and uses these details to make fraudulent payments from customer accounts.
  - e. **Compromise Point Unknown:** Fraudsters use compromised credentials to access customer accounts to make fraudulent payments, but the method used to compromise the credentials is unknown.
- 4. The HSBC Group's Global External Fraud Policy Fraud Risk Definitions Appendix [HBA.0001.0001.1944], which was also used by HSBC Australia, also included the risk of Unauthorised Payments as a result of Account Takeover (also referred to as ATO), which was defined as follows: "A third party claims to be a legitimate account

holder and changes, by deception, static data. This may facilitate gaining access to the account, prevent the genuine customer accessing the account, or prevent the genuine customer being alerted to fraudulent transactions. A successful ATO attack leads to fraudulent transactions being made on the account".

- HSBC Australia Fraud Steering Committee meeting minutes dated May 2021 identified Unauthorised Payments by means of **Impersonation**, where a third party had pretended to be an HSBC Australia staff member, and had compromised the Customer's account and made Unauthorised Payments out of the Customer's account, which was on the rise [HBA.0001.0001.0109\_0018].
- 6. The risk of Unauthorised Payments occurring was evident from external fraud activity that posed a risk to Customers, which was reported internally as evidenced by the matters in paragraph 29 below and the statements made in the documents in Part A of Schedule A.
- 10 Materially before January 2023, HSBC Australia was aware of the risk to Customers of Unauthorised Payments.

- 1. ASIC refers to and repeats the particulars at paragraph 9 above.
- 2. Unauthorised Payments were also referred to by HSBC Australia as a type of **Payment Fraud**.
- 3. From time to time, Unauthorised Payments were also referred to by HSBC Australia as a type of **Scam**.
- The risk of Unauthorised Payments using Digital Access was identified in the HSBC Australia Risk Committee minutes dated 15 April 2021 (including the risk of defrauding Customer by the means of social engineering by Malware, Phishing, Vishing, and Smishing) [HBA.0001.0001.0426\_0055].
- 11 During the Relevant Period, HSBC Australia provided its Customers the functionality to make real-time, or near real-time (within seconds) payments, including to third parties:
  - (a) using Mobile Banking:

- (i) at all times until June 2022, using the Real Time Gross Settlement payment rail;
- (ii) to third parties with HSBC Australia accounts using the internal account transfer HUB payment rail; and
- (iii) from May 2023, using the New Payment Platform (NPP) or FastPayments to other financial institutions that support the NPP;
- (b) using Online Banking:
  - (i) at all times until June 2024, using the Real Time Gross Settlement payment rail; and
  - (ii) at all times, to third parties with HSBC Australia accounts using the internal account transfer HUB payment rail.
- 12 During the Relevant Period the risk of Unauthorised Payments occurring was increased by reason of the matters pleaded at paragraph 11 above.

The increased fraud risks associated with HSBC Australia's proposed introduction of the functionality to "send" payments through NPP (Fast Payments) including the reduced ability for HSBC Australia to recover funds given the velocity with which funds move (citing industry recovery rates are between 20-30%), and that NPP delivers a "more attractive proposition for fraudsters to move stolen funds between local financial institutions" was referred to in the "NPP Phase 2 Discussion paper presented to the HSBC Australia Fraud Steering Committee on 19 August 2021 [HBA.0001.0001.0105\_0029-0030]; and the NPP/Open Banking Project Steering Committee Presentation dated 21 March 2022 [HBA.0001.0001.3661\_0007].

### C. LEGAL OBLIGATIONS THAT APPLIED TO HSBC AUSTRALIA

#### C.1 Obligations under the ePayments Code

13 As a subscriber to the ePayments Code, HSBC Australia was required during the Relevant Period to:

- (a) comply with the ePayments Code's rules with respect to, among other things, unauthorised transactions; and
- (b) warrant that it will comply with the ePayments Code in the terms and conditions that it gave each of its consumer account holders.

- The ePayments Code is a code of practice, which regulates electronic payments, including ATM, EFTPOS and credit card transactions, online payments, internet and mobile banking, and BPAY. Banks and other providers of electronic payment facilities to consumers can subscribe to the Code. During the Relevant Period, the following versions of the ePayments Code applied:
  - a) ePayments Code effective 1 July 2012 amended 29 March 2016 (**2016 ePayments Code**); and
  - b) ePayments Code effective 2 June 2022, with a transitional period requiring subscribers to comply with its provisions by 2 June 2023 (2022 ePayments Code).
- 2. Clauses 1.1(d), 2.2 and cl 4.2(c) and Chapter C of the ePayments Code.
- 3. The ePayments Code defined an **unauthorised transaction** as a 'transaction that is not authorised by a user. The 2022 ePayments Code also stated as part of the definition: "*It does not include any transaction that is performed by a user themselves or by anyone who performs a transaction with the knowledge and consent of a user*", which wording was also included in cl 9.1 of the 2016 ePayments Code.
- 14 At all times during the Relevant Period, the ePayments Code contained rules which applied to HSBC Australia, as a subscriber, for the allocation of liability for losses arising from unauthorised transactions (**Liability Rules**).

#### Particulars

The Liability Rules were contained in Chapter C of the 2016 ePayments Code and the 2022 ePayments Code.

15 The following rules applied to HSBC Australia during the Relevant Period, as a subscriber, in relation to reports of unauthorised transactions by an individual 'holder' or 'user' of a 'facility' (as those terms are defined in the ePayments Code) in respect of transactions that the ePayments Code applied to:

- (a) the Liability Rules;
- (b) a subscriber must have an effective and convenient process for users to report unauthorised transactions;
- (c) within 21 days of receiving a report of an unauthorised transaction, a subscriber must: (a) complete the investigation and advise the user, in writing, of the outcome, or (b) advise the user in writing of the need for more time to complete its investigation;
- (d) unless there are exceptional circumstances, a subscriber must complete its investigation within 45 days of receiving the report of an unauthorised transaction;
- (e) a subscriber must tell a user who reports an unauthorised transaction: (a) the outcome of the report, and (b) the reasons for the outcome, including references to the relevant clauses of the ePayments Code (including the Liability Rules);
- (f) unless there are exceptional circumstances, a subscriber must tell the user the matters referred to in (e), within 45 days of receiving the report of an unauthorised transaction;
- (g) if a report of an unauthorised transaction is settled to the complete satisfaction of a user and the subscriber within 5 business days, the subscriber is not required to advise the user in writing of the outcome of the report, unless the user requests a written response; and
- (h) if a report of an unauthorised transaction is not settled to the complete satisfaction of a user and the subscriber within 5 business days, the information referred to in paragraph (e) and (f) above must be given in writing.

- 1. Clauses 2.1, 2.6, 17.1, 38.4, 38.5, 38.7, 38.8 and 38.9 of the 2016 ePayments Code.
- 2. Clauses 2.1, 2.6, 17.1, 18.1, 18.2, 18.4, 18.6 and 18.7 of the 2022 ePayments Code.

- 3. A **user** was defined to mean a holder or an individual who is authorised by a subscriber and a holder to perform transactions using a facility held by the holder.
- 4. A **holder** was defined to mean an individual in whose name a facility has been established, or to whom a facility has been issued.
- 5. A **facility** was defined to mean an arrangement through which a person can perform transactions.
- By reason of paragraphs 14 and 15(a) above, it was necessary for HSBC Australia to consider and apply the Liability Rules in conducting an investigation of an unauthorised transaction reported to it by its Customers.

#### C.2 Obligations under the Banking Code

- 17 As a signatory to the Banking Code, HSBC Australia was required to:
  - (a) honour the commitments made to Customers in the Banking Code;
  - (b) comply with the Banking Code unless doing so would lead to a breach of the law; and
  - (c) include in its written terms and conditions for all banking services to which the Banking Code applies a statement to the effect that the relevant provisions of the Banking Code apply to the banking service.

#### Particulars

The Banking Code is the Australian Banking Association's code of conduct which sets the standards of good banking practice and service for banks, including HSBC Australia, to follow when dealing with individual and small business customers. HSBC Australia has been a signatory of the Banking Code since at least before the Relevant Period. During the Relevant Period, the following versions of the Banking Code applied:

- A) Banking Code of Practice 1 March 2020 release, revised on 5 October 2021 (**2020 Banking Code**).
- B) Banking Code of Practice 2019, commencing 1 July 2019 (2019 Banking Code).

- 18 During the Relevant Period, HSBC Australia was obliged under the Banking Code to:
  - (a) deliver high customer service and standards;
  - (b) ensure banking services are accessible, inclusive and provided to customers in a fair and ethical manner;
  - (c) engage with customers in a fair, reasonable and ethical manner; and
  - (d) communicate with customers in a timely manner and give customers information that is useful and clear.

Guiding Principles 2, 3 and 4, Chapter 4, cl 10 and Chapter 9, cl 17 of the 2019 Banking Code and 2020 Banking Code.

#### C.3 HSBC Personal Banking Booklet

- 19 During the Relevant Period, HSBC Australia issued the HSBC Personal Banking Booklet (**Booklet**), which formed part of its agreement with its Customers in respect of:
  - (a) Deposit accounts and Loan accounts (among other products); and
  - (b) Digital Access services (among other services).

- During the Relevant Period, HSBC Australia issued versions of the Booklet dated 19 July 2020, 26 September 2020, 30 November 2020, 24 September 2021, 26 November 2021, 1 August 2022, 7 October 2022, 2 June 2023, 3 November 2023 (which only applied to products or services opened after 3 November 2023), 11 April 2024, and 17 July 2024.
- 2. The products and services that the Booklet applied to were listed in cl 2 of the Booklet.
- 20 During the Relevant Period, the Booklet contained the following standard terms in respect of the ePayments Code and the Banking Code:
  - (a) HSBC Australia warrants that it will comply with the ePayments Code;

Cl 3 of the Booklet.

- 21 During the Relevant Period, the Booklet contained the following terms in respect of reports of suspected unauthorised payments:
  - (a) an 'unauthorised payment' is:
    - a payment made from the Customer's account which was not authorised by the Customer or someone the Customer has authorised to make payments from the Customer's account; and
    - (ii) in all versions of the Booklet applicable from 11 April 2024 (and accounts opened after 3 November 2023), a payment is not 'unauthorised' where it is performed by the Customer or by anyone else with the Customer's knowledge and consent.

#### Particulars

Clause 6 of Booklet.

- (b) the Customer must tell HSBC Australia immediately if they suspect a transaction has been made without their authority;
- (c) following a report of a suspected unauthorised payment:
  - (i) in all versions of the Booklet applicable until 10 April 2024, HSBC
     Australia will cancel the access method, if this is necessary and arrange for the Customer to select a new one;
  - (ii) in all versions of the Booklet applicable from 11 April 2024 (and accounts opened after 3 November 2023), HSBC Australia may cancel the access method, if this is necessary and arrange for the Customer to select a new one.

CI 6 and 7 of Booklet.

- 22 During the Relevant Period, the Booklet contained the following terms in respect of blocking payment devices, services and accounts:
  - (a) HSBC Australia can block or suspend a transaction, the Customer's use of any payment device (and the Customer's access to related services such as phone banking, Online Banking or Mobile Banking), keep hold of the Customer's payment device, freeze the Customer's account or place temporary transaction limits on the Customer's account if HSBC Australia reasonably believes it's necessary because of:
    - suspected fraudulent or criminal activity of any kind whether or not linked to the Customer's account or relationship with HSBC Australia; or
    - security concerns (for example, if HSBC Australia knows or suspects that the Customer's payment device and/or security details have been misused);
  - (b) if HSBC Australia does this, HSBC Australia will usually let the Customer know why reasonably soon afterwards, unless HSBC Australia believes the law, or any regulation prevents it from doing so or it believes doing so would compromise reasonable fraud prevention or security measures, or cause harm to someone else; and
  - (c) any scheduled payments during any block or after closure will not be made and HSBC Australia is not responsible for any losses this may cause. HSBC Australia will unblock the transaction, payment device or service as soon as HSBC Australia believes the reason for it ends (HSBC Australia may ask the Customer for more information to help it assess if this is the case) and if it doesn't, HSBC Australia may reject the Customer's payment, keep and close the Customer's payment device and refuse to issue replacements, close access to related services and close the Customer's account.

CI 16 of Booklet.

- 23 During the Relevant Period, the Booklet contained the following standard terms in respect of complaints, disputes and investigations:
  - (a) in all versions of the Booklet applicable until September 2021:
    - (i) HSBC Australia will:
      - (A) investigate a complaint or transaction query immediately and within 21 days of receiving the complaint;
      - (B) write to the Customer explaining the outcome of its investigation or let the Customer know if more time is needed to complete the investigation; and
      - (C) complete its investigation within 45 days of receiving the Customer's complaint, unless exceptional circumstances apply;

### Particulars

CI 62 of Booklet.

- (b) in all versions of the Booklet applicable from 11 April 2024 (and accounts opened after 3 November 2023);
  - HSBC Australia will investigate (and update Customers on) unauthorised payments in accordance with the ePayments Code; and
  - HSBC Australia will handle disputes relating to electronic transactions that are not card transactions in accordance with the ePayments Code; and

### Particulars

CI 6 and 59 of Booklet.

- (c) when HSBC Australia complete an investigation of a complaint, disputed transaction or unauthorised payment, HSBC Australia will inform the Customer of:
  - (i) its conclusions;
  - (ii) the reasons for its conclusions with reference to the relevant provisions of the terms and conditions; and
  - (iii) if applicable the areas of the ePayments Code that apply to its conclusions.

CI 63 of Booklet dated 19 July 2020, 26 September 2020, 30 November 2020.

CI 61 of Booklet dated 24 September 2021, 26 November 2021.

CI 62 of Booklet dated 1 August 2022, 7 October 2022, and 2 June 2023.

CI 60 of Booklet dated 3 November 2023 (which only applied to products or services opened after 3 November 2023), 11 April 2024, and 17 July 2024.

### C.4 Corporations Act and Credit Act obligations

- At all material times, as the holder of the AFSL, HSBC Australia was required pursuant to s 912A(1)(a) of the Corporations Act, to do all things necessary to ensure that the financial services covered by the AFSL were provided efficiently, honestly and fairly.
- 25 At all material times, as the holder of the ACL, HSBC Australia was required pursuant to s 47(1)(a) of the Credit Act, to do all things necessary to ensure that the credit activities covered by the ACL were engaged in efficiently, honestly and fairly.

#### D. HSBC AUSTRALIA'S FAILURE TO HAVE ADEQUATE CONTROLS

# D.1 Inadequate controls for detection and prevention of Unauthorised Payments

- 26 By reason of the:
  - (a) matters pleaded in paragraph 9, alternatively paragraphs 9 to 12 above; and
  - (b) the obligations owed by HSBC Australia as the holder of its AFSL and ACL referred to in paragraphs 24 to 25 above,

during the Relevant Period, HSBC Australia should have had in place adequate controls for the prevention and detection of Unauthorised Payments.

- In the period from 1 January 2023 to 1 June 2024, HSBC Australia failed to have
   in place adequate controls for the prevention and detection of Unauthorised
   Payments, because it failed to have in place each of the following:
  - (a) adequate customer authentication and access controls, including:
    - digital fraud behavioural biometrics, which were not implemented by HSBC Australia across both Mobile Banking and Online Banking until June 2024; and

- HSBC Australia did not adequately implement digital fraud behavioural biometrics (using **BioCatch**), which were necessary to adequately detect and prevent Unauthorised Payments including through Token Reactivation, Smishing, Remote Access, Malware, Account Takeover and Impersonation, until the following dates:
  - a) BioCatch for payments on Mobile Banking was phased in between February and May 2023;
  - b) BioCatch for payments on Mobile Banking using the NPP rail was implemented in June 2023; and
  - c) BioCatch for domestic payments using Online Banking was not implemented until June 2024.

- 2. BioCatch analyses biometric behaviours of digital transaction process, which is designed to distinguish between normal, criminal, and non-human use based on key data captured through the user's engagement with the platform.
- digital fraud device identification capabilities, which were not implemented by HSBC Australia across both Mobile Banking and Online Banking until June 2024;

- HSBC Australia did not implement digital fraud device identification capabilities (using LexisNexis ThreatMetrix), which were necessary to adequately detect and prevent Unauthorised Payments including through Token Reactivation, Smishing, Remote Access, Malware, Account Takeover and Impersonation, until after the following dates:
  - a) ThreatMetrix for payments on Mobile Banking was phased in between February and May 2023;
  - b) ThreatMetrix for payments on Mobile Banking using the NPP rail was implemented in June 2023;
  - c) ThreatMetrix for domestic payments using Online Banking was not implemented until June 2024.
- ThreatMetrix assesses device data, digital identity (i.e. browser activity and digital footprint and true location - IP address) to define patterns of trusted user behaviour.
- (b) adequate real time fraud payment monitoring including transaction interception capabilities to identify and block suspicious activity, which were not implemented by HSBC Australia across both Mobile Banking and Online Banking until about May 2024;

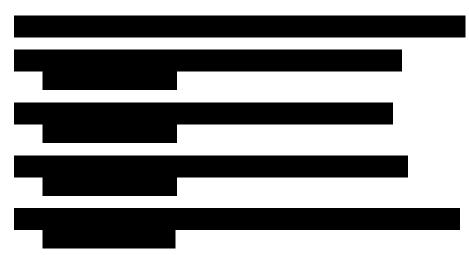
#### Particulars

 HSBC Australia did not adequately implement real time fraud payment monitoring with interception capabilities, which were necessary to adequately detect and prevent Unauthorised Payments including through Token Reactivation, Smishing, Remote Access, Malware, Account Takeover and Impersonation, until after the following dates:

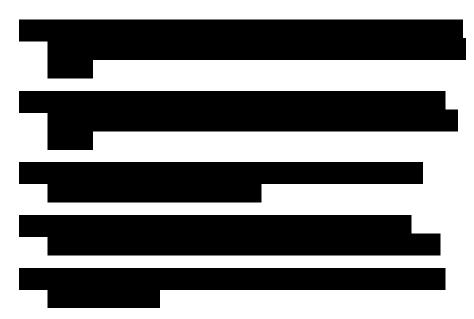
- a) Real time (batch) interception on domestic payments using Online Banking (using the Global Service Platform) to "non me" (third party) accounts outside HSBC Australia was implemented in May 2023.
- b) Real time interception/decline on domestic payments using Online Banking (using the new Banking 2.0 platform which replaced the Global Service Platform) was not implemented until May 2024.
- c) Real time interception for payments using Mobile Banking was not implemented until May 2024.
- adequate or sufficient rules to detect potentially fraudulent activity, including critical rules within its SAS enterprise fraud management (EFM) transaction monitoring software system, which were not introduced until between 5 June 2023 and 18 June 2024.

HSBC Australia did not implement the following rules within its SAS EFM transaction monitoring platform, which were necessary to adequately detect and prevent Unauthorised Payments including through Token Reactivation, Smishing, Remote Access, Malware, Account Takeover and Impersonation, until the dates referred to below:





### 4. Payment to high risk crypto account (12 September 2023);





Further, ASIC refers to and repeats paragraph 29 below from which it can be inferred that HSBC Australia did not have in place adequate controls for the prevention and detection of Unauthorised Payments.

### D.2 Gaps in controls identified by HSBC Australia

- Materially, prior to 1 January 2023, alternatively materially prior to 1 June 2024,
   HSBC Australia management had identified that one or more of the controls in paragraph 27 were:
  - (a) available controls that could be implemented;
  - (b) controls that would substantially protect against the risks of Unauthorised Payments; and/or
  - (c) gaps in HSBC Australia's controls to detect and prevent Unauthorised Payments.

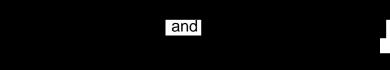
#### Particulars

ASIC refers to the following statements in HSBC Australia documents:

(A) On about 21 January 2021, the Global WPB Financial Crime Risk Management Committee 'Scams Deep Dive' paper dated 6 November 2020 was noted by the AUH WPB Fraud Steering Committee [HBA.0001.0001.0107\_0013]. This included the 'Scams Control Framework', which identified

#### and "Smishing", Vishing, and Phishing activity; and the 'Phish and Smish Control Framework', in Appendix 4, which identified that digital event SAS EFM rules were "live" controls, and BioCatch and ThreatMetrix on both Online Banking and Mobile Banking, and payment interception, were "*in development or partially live*" controls for the prevention and detection of Unauthorised Payments through Mobile Banking and Online Banking [HBA.0001.0001.0018\_0012];

- (B) on 18 March 2021, in the slides of a presentation titled 'Fraud Mitigation Strategy Australia: Scams Overview'
   [HBA.0001.0001.0089], it was noted that HSBC Australia had "no real time interception or payment holding to clarify suspicious transaction content with customer" and that the implementation of real time payment interception "requires funding c.\$380k and will be tied to NPP";
- (C) on 22 July 2021, the slide pack for a meeting of the AUH WPB Fraud Steering Committee [HBA.0001.0001.0108] recorded that "*Current HSBC Fraud Prevention systems cannot intercept transactions before completion*" and that implementation was "[*p*]*ending update of Internet Banking Platform before investment*";
- (D) on 19 August 2021, the slide pack for a meeting of the AUH WPB Fraud Steering Committee [HBA.0001.0001.0105] recorded that there was "[n]o real-time payment interception capability for internet banking transactions, at present";
- (E) on 20 January 2022, the slide pack for a meeting of the AUH WPB Fraud Steering Committee [HBA.0001.0001.0127] recorded that "fraud prevention initiatives such as BioCatch & ThreatMetrix screening capabilities for transactions [are] ... key for fraud prevention for the NPP and Global Money projects";
- (F) the minutes of the AUH WPB Fraud Steering Committee meeting on 20 January 2022 [HBA.0001.0001.0115] record that "Losses resulting from these scam cases and determinations would likely have been avoided with BioCatch/Threatmetrix implementation for transactional monitoring";
- (G) the June 2022, 'Fraud Controls Framework Mobile' for Payment Fraud [HBA.0001.0001.0199] recorded



for the detection of Unauthorised Payments on Mobile Banking;

- (H) on 21 October 2022, the slide pack for a meeting of the AUH WPB Fraud Steering Committee [HBA.0001.0001.0133] recorded that "[c]urrently, HSBC do not have the capability to stop an online transfer of funds from one bank account to another", that "(Mobile) [is] On Track" and that "(Browser) [is] Pending Banking 2.0 No Schedule";
- the 'External Fraud Management: Strategy Appendix 2022 Performance and Deliverables Assessment' dated February 2023 [HBA.0001.0001.0067] recorded that



- Payments Mobile / Web" as costing USD\$200,000;
- (K) a slide pack for the meeting of the AUH WPB Fraud Steering Committee on 13 July 2023 [HBA.0001.0001.0061], recorded that "[I]ack of Biocatch and Threatmetrix capability on Desktop (PIB) significantly impacts our detective and preventative capability";
- (L) in May 2023, 'Fraud Controls Framework Browser' for Payment Fraud [HBA.0001.0001.0197] and 'Fraud Controls Framework – Mobile' for Payment Fraud [HBA.0001.0001.0200] each



Banking and Online Banking;

- (M) minutes of the Fraud Steering Committee dated 13 July 2023 [HBA.0001.0001.0083], recorded in relation to 'HSBC Impersonation Scam' that "[c]hallenges [are] arising from the management of this risk: resourcing constraints limiting speed to action, Inconsistent coverage of contextual data tools (BC/TM X) being not deployed In browser, payment rules deployed have been blunt to date as a result of limited systems and tools capabilities which have prevented precision rules";
- (N) a 14 November 2023, a 'Scams Scope Convergent Assessment' [HBA.0001.0001.0180] recorded that ThreatMetrix and BioCatch were yet to be implemented for

Online Banking, and that deployment "*Must*" occur and was identified as a system "*Gap*";

- (O) on 4 December 2023, the slide pack for a meeting of the AUH WPB Fraud Steering Committee [HBA.0001.0001.0152] provided estimates to implement Real Time Intercept and ThreatMetrix and BioCatch on the Desktop (i.e. Online Banking), and recorded that "[u]ntil this happens FIM cannot disrupt scams and losses will continue to mount";
- (P) in April 2024, the HSBC Australia Scams and Fraud report [HBA.0001.0001.0192] recorded that: "[f]rom a detection perspective, the two highest priority gaps that remain are real-time interception capability for domestic desktop (browser/GSP) [Online Banking] payments and HSBC-HSBC mobile payments";
- (Q) the further statements made in the documents in Schedule B.

## D.3 Significant increase in Consumer losses from Unauthorised Payments from May 2023

29 From around mid-2023 continuing until about June 2024, there were significantly increased volumes of Unauthorised Payment activity, resulting in Customers losing significant sums of money.

- 1. The increased volume of cases, primarily driven by Unauthorised Payment Impersonation cases was recorded in an HSBC Australia presentation to ASIC dated June 2024, slide 20 [BCB.1002.0001.0039].
- The increased volume of Unauthorised Payment activity is reflected in the increased volume of reports of unauthorised transactions received by HSBC Australia from mid-2023, as recorded in column (b) of Schedule F.
- 3. The increased volumes and significant losses suffered by Customers as a result of Unauthorised Payments including through Impersonation were recorded in the following documents:
  - a. In a 'Wealth and Personal Banking Business Presentation' to the HSBC Australia Board of Directors dated 9 February 2024, it was reported that "WPB Australia customer exposure from scams has increased from \$9m in 2022 to —\$25m in 2023, with impersonation and investment scams making up the majority of those customer losses. Of the \$25m in

customer exposure, the net loss to the bank was \$3.1 m, which was made up of goodwill/reimbursements and provisions" [HBA.0001.0001.0397\_0004].

- b. In an HSBC Australia presentation to ASIC dated 10 April 2024, the estimated annual Customer exposure from Unauthorised Payments through Impersonation using Online Banking and Mobile Re-Provisioning was \$20 million and \$30 million respectively, slides 42 and 43 [HBA.0001.0001.0145].
- c. On 29 April 2024, in a report titled "Managing the Risk of Fraud and Scams in WPB" to the HSBC Australia Risk Committee, it was reported that there was an increase in gross Payment Fraud losses (inclusive of Scams) in 2023, which spiked in 4Q 2023 (2.67x increase year on year). For FY2022, total gross Customer losses were \$9 million; and FY2023 \$34 million. It was reported that 53% of Customer losses in FY2023 related to Impersonation scam cases (\$18 million). Among the various Payment Fraud typologies, 'unauthorised payment fraud', and 'authorised/scam payment fraud' were the most prominent types impacting HSBC Australia and its Customers [HBA.0001.0001.0457\_0202].
- d. On 18 October 2024, the AUH WPB Fraud Steering Committee reported the gross losses (to Customers) from Payment Fraud in the period from January 2024 to September 2024 was almost \$61 million, of which over \$24 million was as a result of Impersonation scams (data calculated at case close date) [HBA.0001.0001.3466\_0007].
- e. Response to NTC2425818 Attachment A dated 1 November 2024 [BCB.1010.0001.0008] records, for Customers who reported an unauthorised transaction the Customers' total loss (net of any recoveries) at column (i).
- f. Response to NTC2426642 Attachment C [BCB.1012.0001.0013] dated 25 November 2024 which records for Customers who reported an unauthorised transaction the Customers' total loss (net of any recoveries) at column (i).
- g. Response to NTC2426457 Attachment A [BCB.1018.0001.0003] dated 5 December 2024 which records for Customers who reported an unauthorised transaction, the transaction amounts at column C.

# E. INVESTIGATING AND RESPONDING TO UNAUTHORISED TRANSACTION REPORTS

#### E.1 Systems and processes for investigating unauthorised transactions

30 During the Relevant Period, HSBC Australia received reports from Customers of unauthorised transactions for the purposes of the ePayments Code.

#### Particulars

The reports of unauthorised transactions from Customers were recorded by HSBC Australia staff members in a Financial Crime – Unusual Activity Report (**FC-UARs**) and/or were stored in HSBC Australia's unified case management (**UCM**) system for fraud cases.

# E.1.1 Inadequate systems and processes for investigating unauthorised transactions

- 31 During the Relevant Period:
  - (a) the two main teams at HSBC Australia involved in investigating unauthorised transactions and preparing information for any reporting of outcomes to Customers were the Financial Crime Investigations (FCI) Major Investigations (FCMI) team and the Fraud Investigation Management (FIM) team;
  - (b) the FCI-Triage team also provided assistance with the initial steps of some investigations, including to ensure appropriate information had been collected and that the investigation was referred to the appropriate team; and
  - (c) from about the end of August 2021, the FIM team took over primary responsibility from the FCMI team for handling the investigation of the majority of unauthorised transactions and preparing information for the reporting of outcomes to Customers.

#### Particulars

The transition of "*low risk/high volume labour intensive*" case reviews from the FCMI team to the FIM team including Unauthorised Payments (which was also

described by HSBC Australia internally as 'Payment Fraud') in about the end of August 2021 was recorded in Takeover Certificate for Fraud Typologies (AUH Financial Crime Investigations (FCI) Major Investigations to AUH WPB CCS (Onshore Fraud Investigation Management (FIM) Team)) Australia (**FIM Fraud Investigation Takeover Certificate**) [HBA.0001.0001.1903].

- 32 HSBC Australia's systems and processes which governed the FCI-Triage team, FCMI team and FIM team's investigation of unauthorised transactions and preparing information for the reporting of outcomes to Customers in the Relevant Period until about August 2023:
  - (a) were recorded in internal documents; and

#### Particulars

The documents are listed in Part B of Schedule A.

- (b) were not linked to, did not refer or have regard to, and did not seek to apply:
  - the timeframes or processes referred to in the ePayments Code and the Booklet, and in particular to any of the matters referred to in paragraphs 15(c) to 15(f), 15(h), 23(a) and 23(c) above;
  - (ii) the Liability Rules.
- During the Relevant Period until approximately November 2023, HSBC
   Australia's systems and processes for the investigation of unauthorised
   transactions, and reporting of outcomes to Customers:
  - (a) applied the HSBC Group's expected timelines (referred to as **SLAs**); and

#### Particulars

 When the FCMI team transferred primary responsibility for investigating Unauthorised Payments to the FIM team in about the end of August 2021 as referred to in paragraph 31(b) above, FIM Fraud Investigation Takeover Certificate [HBA.0001.0001.1903] confirmed that the relevant SLAs which applied were aligned to the global framework, which were set out in the email from Basil Su to Lucy Mullens dated 10 February 2021 [HBA.0001.0001.1945].

- 2. It can be inferred that the same time frames applied from the beginning of the Relevant Period.
- 3. HSBC Group's expected timelines were also set out in the HSBC Group Fraud Investigations Global Standards Manual dated January 2023 [BCB.1000.0001.0280].
- (b) applied the following SLAs:
  - (i) if a fraud case reported in a FC-UAR is referred to the FCI -Triage team, the FCI-Triage team were to review and assign it for investigation by the FIM team or External Investigative Reporting within 7 calendar days of the date of creation of the FC-UAR;
  - (ii) if the fraud case in a FC-UAR was referred to the FIM team (whether directly or via the FCI-Triage team), the FIM team would investigate the fraud case to closure, or transfer the investigation to the FCMI team, within 53 days of case assignment to the FIM team (that is, within a maximum of 60 days of creation of the FC-UAR, if the fraud case was referred via the FCI-Triage);
  - (iii) if a fraud case generated by an FC-UAR was referred to the External Investigative Reporting team, the investigation should be completed within 90 days (including the period in review by FCI-Triage, and investigation by FIM and External Investigative Reporting team); and
  - (iv) for FC-UAR investigations referred by the FIM team (or FCI-Triage) to the FCMI team, no time frame for completion of the FCMI team's investigation was specified.

- FIM Fraud Investigation Takeover Certificate [HBA.0001.0001.1903] which referred at point 6 to the "FW FIM SLA" email chain including an email dated 10 February 2021 from Basil Su to Lucy Mullens [HBA.0001.0001.1945].
- HSBC Group Fraud Investigations Global Standards Manual dated January 2023 [BCB.1000.0001.0280\_0290].

- At all times during the Relevant Period until August 2024, a significant proportion of the investigations of reports of unauthorised transactions undertaken by HSBC Australia did not comply with the timeframes or processes referred to in the ePayments Code (as referred to in paragraphs 15(c) to 15(d) and 15(h) above) or the Booklet (as referred to in paragraph 23 above), in that HSBC Australia did not:
  - (a) within 21 days of receiving a report of an unauthorised transaction, either
     (a) complete its investigation and advise the Customer in writing of the outcome, or (b) advise the Customer in writing of the need for more time to complete its investigation;
  - (b) complete its investigation of the unauthorised transaction within 45 days of receiving reports of unauthorised transactions (unless there were exceptional circumstances); or
  - (c) report outcomes of investigations to Customers in writing including the reasons for the outcome, within 45 days of receiving reports of an unauthorised transaction (or at all).

ASIC refers to paragraphs 46 to 48, 53 to 57, and Schedules F and G.

- 35 At all times during the Relevant Period until August 2023, HSBC Australia did not have in place adequate systems or processes in respect of the requirements set out in the ePayments Code referred to at paragraphs 15(c) to 15(f) and 15(h) above for:
  - (a) completing its investigation and advising the Customer (in writing) of the outcome within 21 days of receiving a report of an unauthorised transaction, or advising the Customer in writing of the need for more time to complete its investigation;
  - (b) completing its investigation within 45 days of receiving reports of unauthorised transactions (unless there were exceptional circumstances); or

- 1. ASIC refers to and repeats the matters in paragraphs 31 and 32 above.
- 2. Further, ASIC refers to and repeats paragraph 33 above, and paragraphs 46 to 48, 53 to 57 below from which it can be inferred that HSBC Australia did not have in place adequate systems and processes.
- 36 At all times during the Relevant Period:
  - (a) before October 2023, HSBC Australia did not:
    - (i) consider the Liability Rules in conducting its investigation of unauthorised transactions; or
    - (ii) apply the Liability Rules;
  - (b) before December 2023, HSBC Australia did not refer to relevant clauses of the ePayments Code (including the Liability Rules) in reporting on the outcome of its investigation of the unauthorised transaction to the Customer.

#### Particulars

ASIC refers to and repeats the matters in paragraphs 31 and 32 above.

Further, neither the investigation reports nor the reports to Customers made any reference to any of the Liability Rules, until 3 October 2023 and 20 December 2023 respectively.

ASIC refers to paragraph 52(i) and Schedule F (columns I and m), and Schedule G, from which it can be inferred that HSBC Australia did apply or consider the Liability Rules.

37 At all times during the Relevant Period until December 2023, HSBC Australia did not have in place adequate systems or processes in respect of the Liability Rules.

#### Particulars

- 1. ASIC refers to and repeats the matters in paragraphs 32(b)(ii) and 36 above.
- 2. ASIC refers to paragraph 52(h) and Schedule F (column I and m), from which it can be inferred that HSBC Australia did not have in place adequate systems and processes.

#### E.1.2 Inadequate tracking of compliance with ePayments Code requirements

- 38 From March 2021 until January 2024, the number of open Payment Fraud and Account Takeover and "scam" cases (among other cases) currently under investigation by the FCMI team (which included unauthorised transactions) were reported periodically to the HSBC Australia WPB Fraud Steering Committee:
  - (a) by reference to the number of cases which had been open and under investigation for zero to 89 days, 90 to 180 days and over 180 days; and
  - (b) without making any reference to the required investigation time frames of 21 days and 45 days referred to in the ePayments Code as referred to in paragraphs 15(c) to 15(d) above.

#### Particulars

The number of open Payment Fraud and Account Takeover cases reported by the FCMI team to the AUH WPB Fraud Steering Committee in the period March 2021 to January 2024 are set out in Schedule C.

39 From September 2022, the volume of received, open and completed "scam" and "payment & cheque" cases (which included unauthorised transactions as well as other fraud typologies) managed by the FIM team was reported periodically to the AUH WPB Fraud Steering Committee and in other forums within HSBC Australia.

#### Particulars

1. The number of new, open and completed "scams" and "payment & cheque" cases reported by the FIM team to the AUH WPB Fraud Steering Committee for the period September 2022 to December 2023 are in Schedule D.

- The number of open "scams/fraud" and "payment & cheque" cases reported by the FIM team to the AUH WPB Fraud Steering Committee and the AUH EXCO Scams Forum in the period 28 March 2024 to 18 October 2024 are in Schedule E.
- 3. The FIM reports did not identify what comprised "scams", "scams/fraud", or a "payment & cheque" case, but it can be inferred they included unauthorised transactions.
- 40 In respect of HSBC Australia's reporting of open cases being investigated by the FCMI team and FIM teams during the Relevant Period referred to in paragraphs 38 and 39 above:
  - (a) none of the reports, nor any other reports, identified the number of reported, open or completed unauthorised transactions for the purposes of the ePayments Code that were investigated by the FCMI team or FIM teams;
  - (b) none of the reports, nor any other reports, reported how many open or closed unauthorised transactions cases exceeded the 21-day or 45-day investigation and reporting time requirements in the ePayments Code referred to in paragraphs 15(c) to 15(d) above;
  - (c) the reports used inconsistent and confusing terminology; and
  - (d) by reason of the matters in sub-paragraphs (a), (b) and/or (c) above, it was difficult or impossible for HSBC Australia's management to track, or reliably track, HSBC Australia's compliance with its obligations under the ePayments Code referred to in paragraphs 15(c) to 15(d) above.

- 1. Within the same presentation:
  - a. The FCMI team reported separately on the figures for "payment fraud" cases and "account takeover" cases (which included Unauthorised Payment and unauthorised transaction cases) and "scam" cases (which included authorised payment cases, and can be inferred did not include unauthorised transaction cases).

- b. The FIM team reported on "scams" or "scams/fraud" cases which included combined figures for both Unauthorised Payment cases (including unauthorised transactions) and "authorised payment" or push/pull cases, which were not unauthorised transactions, and separately reported on "payment & cheque" cases.
- 2. Neither the FIM team nor FCMI referred to or reported on unauthorised transactions as defined in the ePayments Code.
- 3. The FCMI team did not report on any of the relevant timeframes required by the ePayments Code and the FIM team only reported on the relevant timeframes from March 2024, but not by reference to "unauthorised transactions" for the purposes of the ePayments Code.
- 41 On about 9 November 2023, HSBC Australia's ePayments Code Compliance Project Steering Committee approved new SLAs to apply to the investigations of unauthorised transactions under the ePayments Codes.

- The approval of the new SLAs were recorded in an ePayments Code Project Steering Committee Meeting presentation dated 9 November 2023 on slide 4 (item 35) [HBA.0001.0001.1735].
- 2. The SLAs were recorded in Appendix D of ePayments Code Project Steering Committee Meeting presentation dated 9 November 2023 [HBA.0001.0001.1735].
- 42 In November 2024, HSBC Australia's WPB Fraud Investigation Mitigation team implemented a process of tracking and reporting HSBC Australia's compliance with the requirements in the ePayments Code referred to in paragraphs 15(c) to 15(d) above.

### Particulars

The process implemented by the WPB Fraud Investigation Mitigation team is referred to in HSBC Australia's response to ASIC Notice NTC2426642 dated 25 November 2024 (item 5).

43 Prior to November 2024, HSBC Australia did not have in place any systems or processes to track and report the extent to which HSBC Australia was complying with the requirements in the ePayments Code referred to in paragraphs 15(c) to 15(d) above other than as referred to at paragraphs 31 to 42 above.

- 44 By reason of the matters in paragraphs 31 to 43 above, at all times during the Relevant Period until November 2024, HSBC Australia did not have in place any, or any adequate, systems or processes to track and report the extent to which HSBC Australia was complying with the requirements in the ePayments Code referred to in paragraphs 15(c) to 15(d) above.
- 45 Further and alternatively, by reason of the matters in paragraphs 31 to 41 above, at all times during the Relevant Period until at least November 2023, HSBC Australia did not have in place any, or any adequate systems or processes to track and report the extent to which HSBC Australia was complying with the requirements in the ePayments Code referred to in paragraphs 15(c) to 15(d) above.

# E.1.3 HSBC Australia's reporting of widespread or systemic delays in completing investigations

46 In the period from October 2022 to January 2024, the FIM and FCMI team reported an increasing and significant number of Payment Fraud, Account Takeover and Scam cases (which included unauthorised transactions) that were under investigation and remained open for a period exceeding the 21-day and 45-day timeframes referred to in paragraphs 15(c) and 15(d) above.

- The number of open 'payment fraud' and "account takeover" cases reported by the FCMI team to the AUH WPB Fraud Steering Committee in the period March 2021 to January 2024 are in Schedule C, including open cases which exceeded 90 days.
- The number of new, open and completed Scam and "payment & cheque" cases reported by the FIM team to the AUH WPB Fraud Steering Committee for the period September 2022 to December 2023 are in Schedule D.
- 47 In the period from 28 March 2024 to June 2024, the FIM team continued to report a significant number of open Scam cases (which included unauthorised transactions) which remained open for a period longer than 45 days.

The number of new Scam cases, and open "scams/fraud" and "payment & cheque" cases reported by the FIM team to the AUH WPB Fraud Steering Committee in the period 28 March 2024 to 18 October 2024 are in Schedule E.

#### E.2 Investigating reports of unauthorised transactions

On the dates in column (b) of Schedule F, HSBC Australia received from a Customer(s) a report of one or more unauthorised transactions (UARs) identified by the UCM system reference number in column (a) of Schedule F (UAR Customers).

#### Particulars

The unauthorised transactions were recorded in FC-UARs.

- 49 Each of the unauthorised transactions recorded in the UARs identified in Schedule F:
  - (a) was:
    - (i) performed using HSBC Australia's Digital Access; and/or
    - (ii) involved a direct debit or online bill payment (including BPAY);
  - (b) involved one or more payments made from a Customer's Deposit account and/or Loan account to a third party;
  - (c) constituted one or more 'transactions' to which the ePayments Code applied by reason of being:
    - a 'payment or funds transfer' for the purposes of cl 2.4 of the ePayments Code;
    - (ii) a 'pay anyone banking facility transaction' within the meaning of cl 2.5(c) of the ePayments Code;
    - (iii) an 'online bill payment (including BPAY)' within the meaning of cl 2.5(e) of the ePayments Code;

- (iv) a 'direct debit' within the meaning of cl 2.5(g) of the ePayments Code; and/or
- (v) a 'transaction using a mobile device' within the meaning of cl 2.5(i) of the ePayments Code.
- 50 Each of the UAR Customers in Schedule F was an individual in whose name a facility had been established with HSBC Australia and therefore a 'holder' within the meaning of cl 2.6 of the ePayments Code.
- 51 Each of the UARs identified in Schedule F was:
  - (a) a complaint of an 'unauthorised transaction' within the meaning of cl 2.6 and cl 38 of the 2016 ePayments Code; and/or
  - (b) a report of an 'unauthorised transaction' within the meaning of cl 2.6 and cl 18.1 of the 2022 ePayments Code.
- 52 Further, in respect of each of the UARs:
  - (a) HSBC Australia was required pursuant to cl 38.4 of the 2016 ePayments
     Code and cl 18.1 of the 2022 ePayments Code within 21 days of receiving
     the UAR, being the date identified in column (c) of Schedule F, to either:
    - (i) complete the investigation of the UAR (Investigation), and advise the UAR Customer in writing of the outcome (Investigation Outcome); or
    - (ii) advise the UAR Customer in writing of the need for more time to complete its Investigation (Extra Time Request);
  - (b) HSBC Australia did not advise the UAR Customer of the Extra Time Request until the date identified in column (d) of Schedule F (if a date is specified in that column); or
  - (c) HSBC Australia did not complete the Investigation until the date identified in column (e) of Schedule F (if a date is specified in that column), with the total number of days taken to complete UAR Investigation identified in column (f) of Schedule F;

(d) there were no exceptional circumstances;

# Particulars

This is recorded in HSBC Australia's responses to section 912C notices as follows:

- 1. Response to NTC2425818 Attachment A [BCB.1009.0001.0011; BCB.1010.0001.0008];
- 2. Response to NTC2426028 Attachment A [BCB.1010.0002.0004]; and
- 3. Response to NTC2426642 Attachment C [BCB.1012.0001.0013].
- (e) HSBC Australia was required pursuant to cl 38.5 of the 2016 ePayments Code and cl 18.2 of the 2022 ePayments Code, to complete the Investigation within 45 days of receiving the UAR unless there were exceptional circumstances (which there were not), being the date identified in column (h) of Schedule F;
- (f) HSBC Australia was required pursuant to cl 38.5, 38.7 and 38.9 of the 2016 ePayments Code and cl 18.2, 18.4 and 18.7 of the 2022 ePayments Code to advise the UAR Customer of the Investigation Outcome, within 45 days of receiving the UAR unless there were exceptional circumstances (which there were not), being the date identified in column (h) of Schedule F;
- (g) HSBC Australia did not advise the UAR Customer of the Investigation
   Outcome until the date identified in column (i) of Schedule F (if a date is specified in that column);
- (h) HSBC Australia did not refer to the Liability Rules in each of the Investigations of the UARs marked 'no' in column (I) of Schedule F; and
- HSBC Australia did not refer to the Liability Rules in each of the Investigation Outcomes for the UARs marked 'no' in column (m) of Schedule F.

# E.3 Significant, widespread or systemic non-compliance with the ePayments Code

- 53 By reason of paragraphs 52(a) to (c) above, HSBC Australia did not comply with cl 38.4 of the 2016 ePayments Code and cl 18.1 of the 2022 ePayments Code in respect of the UARs marked "no" in column (g) of Schedule F, in that it failed within 21 days of receiving the UAR to either:
  - (a) complete the Investigation and advise the UAR Customer of the Investigation Outcome; or
  - (b) advise the UAR Customer of the Extra Time Request.
- 54 By reason of paragraphs 52(c) to (d) above, HSBC Australia did not comply with cl 38.5 of the 2016 ePayments Code and cl 18.2 of the 2022 ePayments Code in respect of the UARs marked "no" in column (j) of Schedule F in that it failed to complete the Investigation of the UAR within 45 days of receiving the UAR.
- 55 By reason of paragraphs 52(e) to (f) above, HSBC Australia did not comply with cl 38.5, 38.7 and 38.9 of the 2016 ePayments Code and cl 18.2, 18.4 and 18.7 of the 2022 ePayments Code in respect of the UARs marked "no" in column (k) of Schedule F in that it failed to advise the UAR Customer of the Investigation Outcome within 45 days of receiving the UAR.
- 56 By reason of paragraphs 19 and 20 above, in each instance HSBC Australia did not comply with the ePayments Code referred to in paragraphs 53 to 55 above, it breached the Booklet terms (as referred to in paragraphs 20(a), and 23 above).
- 57 Further, during the Relevant Period until August 2024, HSBC Australia's failures to comply with the ePayments Code and the Booklet terms, as referred to in paragraphs 53 to 56 above, were:
  - (a) significant;
  - (b) widespread; and/or
  - (c) systemic.

The extent of non-compliance in the period January 2020 to 30 August 2024 with the ePayments Code is set out in Schedule G. As set out in more detail in Schedule G, in the period January 2020 to 30 August 2024:

- 1. HSBC Australia received 950 UARs.
- HSBC Australia took more than 21 days to advise the Customers of the Extra Time Request for 443 UARs (47%).
- The mean average number of days it took HSBC Australia to advise Customers of an Extra Time Request was 46 days. Excluding UARs in which HSBC Australia advised a customer of Extra Time Request within 21 days, the average number of days increases to 62 days.
- 4. HSBC Australia took more than 21 days to complete its Investigation into 880 UARs (93% of all UARs).
- 5. The mean average amount of time HSBC Australia took to complete its Investigation into an UAR is 145 days.
- 6. HSBC Australia took more than 100 days to complete its Investigation into 631 UARs (66%).
- 7. HSBC Australia took more than 200 days to complete its Investigation into 212 UARs (22%).
- HSBC Australia took more than 21 days to advise the Customer of the Investigation Outcome for 776 UARs (82% of all UARs).
- HSBC Australia took more than 45 days to advise the Customer of the Investigation Outcome for 702 UARs (74%).
- 10. The mean average amount of time HSBC Australia took to advise the Customer of the Investigation Outcome is 168 days.
- 11. HSBC Australia took more than 100 days to advise the Customer of the Investigation Outcome for 571 UARs (60%).
- 12. HSBC Australia took more than 200 days to advise the Customer of the Investigation Outcome for 300 UARs (32%).
- 13. HSBC Australia did not advise the Customer of the Investigation Outcome for 146 UARs (15%).
- 14. HSBC Australia failed to comply with the prescribed timeframes in cl 38.4 and 38.5 of the 2016 ePayments Code

and cl 18.1 and 18.2 of the 2022 ePayments Code for 743 UARs (78%).

# F. DELAY IN REINSTATING BLOCKED CUSTOMER'S BANK ACCOUNTS

#### F.1 Systems and processes for blocking and reinstating banking services

- 58 At all times during the Relevant Period, after a Customer reported an unauthorised transaction under the ePayments Code to HSBC Australia, HSBC Australia's system and process was that it would review the nature of the unauthorised transaction, and where it considered necessary:
  - (a) apply restrictions to transactions on the Customer's Loan account or Deposit account (or both) (Account Restrictions);
  - (b) block the Customer's access to Online Banking or Mobile Banking (or both) (Digital Block); or
  - (c) apply a combination of Account Restrictions and a Digital Block.

#### Particulars

HSBC Australia's system and process for the Account Restrictions and Digital Block were recorded in the documents listed in Part C of Schedule A.

59 As a result of the system and process referred to in paragraph 58, where a Customer reported an unauthorised transaction to HSBC Australia, HSBC Australia usually applied Account Restrictions, a Digital Block (or both).

#### Particulars

HSBC Australia applied an Account Restriction, Digital Block (or both) to 96% of the UARs received between January 2020 and August 2023. See Schedule I.

- 60 Prior to about April 2024, if Account Restrictions or a Digital Block (or both) had been applied, HSBC Australia's typical process was that while an investigation of the unauthorised transaction was underway and had not been closed by either the FCMI team or the FIM team:
  - (a) any Account Restrictions and Digital Block would not be removed;

- (b) the Customer would not be provided with a new electronic banking number or personal banking number to allow Digital Access; and
- (c) the Customer could not use or access the account while the Account Restrictions and Digital Block (or both) remained in place.

HSBC Australia's process prior to April 2024 is evidenced by, or to be inferred from, the following:

- 1. Getting customers back to banking presentation dated April 2024, slide 4 [HBA.0001.0001.2064].
- 2. HBAU's response to ASIC Notice NTC2426642 item 2, in which HBAU stated that the reference to the "Old Process" in slide 4 of HBA.0001.0001.2064 is a reference to the processes that were in place prior to April 2024.

Further, the typical process prior to April 2024 can be inferred from the fact that there were systemic and widespread delays in removing Account Restrictions and Digital Block while an investigation was underway and not yet closed, as alleged in paragraphs 63 to 64, and 67 below, and Schedules H and I.

- 61 Further, or alternatively, at all times during the Relevant Period until about April 2024, HSBC Australia did not have in place any, or any adequate, systems or processes for:
  - (a) reinstating full access and use of the Customer's banking services; or
  - (b) advising the Customers of the process to reinstate full access or use of their accounts,

promptly or within a reasonable period of time after Account Restrictions and Digital Blocks had been applied following a report of an unauthorised transaction.

## Particulars

The lack of any, or any adequate, systems or processes before April 2024 can be inferred from:

1. HSBC Australia Fraud Steering Committee presentation dated 12 December 2023 [HBA.0001.0001.0059\_0015 and 0016].

- 2. Scams Scope Convergent Assessment dated 14 November 2023 [HBA.0001.0001.0180, row 165].
- The reference to a lack of a "clear process" and a "black hole in the process" in the HSBC Australia Fraud Steering Committee minutes dated 12 December 2023 [HBA.0001.0001.0082\_0003].
- 4. The reference to "uplift back to banking" in the Scams Capability Uplift steering committee meeting presentation, dated 19 December 2023 [HBA.0001.0001.0154, slide 8].
- The lack of reference to any such, or any adequate, systems or processes in the documents referred to in HSBC Australia's response to ASIC Notice NTC2425621 dated 30 September 2024 (item 2).
- 6. The fact that there were systemic and widespread delays in removing Account Restrictions and Digital Block after a Customer reported an unauthorised transaction, as alleged in paragraphs 63 to 64, and 67 below, and Schedules H and I.
- 7. Internal documents recording interactions with Customers who had reported unauthorised transactions including, the 6 December 2023 HSBC Australia file note recording that the "Customer asked if she will be able to access her account and the agent said that it cannot be accessed till the investigation is completed" [HBA.0001.00001.5442\_0006].
- 8. At all times during the Relevant Period, HSBC Australia received ongoing complaints about the delays experienced by Customers in having full access or use of their banking services reinstated after Account Restrictions (including in some cases, restrictions on mortgage repayments), a Digital Block (or both) had been put in place, and that there had been no communication from HSBC Australia on when full use and access would be restored, including as referred to in the following documents:
  - a. HSBC Australia WBP Fraud Steering Committee Minutes dated 27 November 2020 [HBA.0001.0001.3471\_0015].
  - b. AUH WPB Fraud Steering Committee Minutes dated 27 October 2021 [HBA.0001.0001.0100\_0010].
  - c. AUH WPB Fraud Steering Committee minutes dated 20 January 2022 [HBA.0001.0001.0115\_0007].
  - d. AUH WPB Fraud Steering Committee presentation dated 17 February 2022 [HBA.0001.0001.0126\_0016, 0019 and 0057].

- f. HSBC Australia Fraud Steering Committee presentation dated 22 August 2022 [HBA.0001.0001.0125\_0048].
- g. HSBC Australia Fraud Steering Committee presentation dated 13 July 2023 [HBA.0001.0001.0061\_0026].
- h. HSBC Australia Fraud Steering Committee presentation dated 16 August 2023 [HBA.0001.0001.0058\_0023].
- i. Monthly Complaints Report October 2023 referred to in 'Reporting arrangements to senior management, board, and other relevant forums' in response to ASIC Notice NTC2423059 [BCB.1000.0001.0239\_0240].
- j. HSBC Australia Fraud Steering Committee presentation dated 12 December 2023 [HBA.0001.0001.1117, slide 30].
- k. Investigation report on complaint number C230636074476 dated 29 April 2024 [HBA.0001.0001.2801\_0010].
- I. HSBC Australia Fraud Steering Committee presentation dated 25 June 2024 [HBA.0001.0001.3464\_0024].
- m. HSBC Australia Fraud Steering Committee presentation dated 16 August 2024 [HBA.0001.0001.1093, slide 23].
- n. HSBC Australia Fraud Steering Committee presentation dated 18 October 2024 [HBA.0001.0001.3466\_0024].
- 62 As a result of the matters pleaded in paragraphs 58 to 61 above, after a Customer reported an unauthorised transaction to HSBC Australia, if Account Restrictions or a Digital Blocks (or both) were applied by HSBC Australia, they typically remained in place until after HSBC Australia's fraud investigation had been underway for a significant period of time, or until after it was completed.

ASIC refers to and repeats paragraph 64 below and Schedule H.

# F.2 Systemic and widespread delays in reinstating access to Blocked Customers

- On the dates identified in column (c) of Schedule H, HSBC Australia applied an Account Restriction or a Digital Block (or both) of the nature referred to in column (d) of Schedule H in respect of the Customer(s) identified by the UCM system reference number in column (a) of Schedule H (Blocked Customers).
- 64 In respect of each of the Blocked Customers:
  - (a) HSBC Australia placed the Account Restrictions, or a Digital Block (or both) after HSBC Australia had received from a Blocked Customer(s) a UAR identified on the date in column (b) of Schedule H;
  - (b) HSBC Australia did not advise the Blocked Customer of the process to reinstate full access or use of the Blocked Customer's account(s) that had been blocked or restricted until the date identified in column (e) of Schedule H (if a date is specified in that column, otherwise not at all), with the total number of days taken to advise the customer of the process identified in column (f) of Schedule H (if applicable);
  - (c) HSBC Australia did not reinstate full access and use of the Blocked Customer's accounts that had been blocked or restricted until the date identified in column (g) of Schedule H (if a date is specified in that column, otherwise not at all) with the total number of days taken to reinstate full access and use in column (h) of Schedule H (if applicable); and
  - (d) the time taken in (b) and (c) above typically occurred at the same time as HSBC Australia was investigating the UAR, with the total number of days taken by HSBC Australia to complete its investigation in column (j) of Schedule H (which typically exceeded 45 days).
- 65 Each of the Blocked Customers in Schedule H was an individual to whom the Banking Code applied under cl 1 of the Banking Code.
- 66 By reason of paragraphs 17 to 19, 20(b) and 65, in each instance HSBC Australia failed to reinstate the Blocked Customer's full access and use of the Blocked Customer's account(s), or advise the Blocked Customers of the process to reinstate full access or use of the Blocked Customer's account(s) promptly or

within a reasonable period of time (or at all) as referred to in paragraphs 63 and 64 above, it breached the Booklet terms by not complying with the Banking Code in that it did not:

- (a) deliver high customer service and standards;
- (b) ensure its banking services were accessible to customers;
- (c) engage with customers in a fair and reasonable manner; or
- (d) communicate with customers in a timely manner and give customers information that was useful and clear.

#### Particulars

In each instance in Schedule H, HSBC Australia following receipt of the UAR, failed to:

- A) advise the Blocked Customer of the process to reinstate full access or use of the Customer's account(s) promptly or within a reasonable period of time, or in any event, a period that exceeded 21 days; and
- B) reinstate full access or use of the Blocked Customer's account(s) promptly or within a reasonable period of time, being a period that exceeded 21 days.
- 67 Further, during the Relevant Period until August 2024, HSBC Australia's failures to reinstate the Blocked Customer's full access and use of the Blocked Customer's account(s), or advise the Blocked Customers of the process to reinstate full access or use of the Blocked Customer's account(s), promptly or within a reasonable period of time (or at all) as referred to in paragraphs 63 to 64 above and to comply with the Booklet terms as referred to in paragraphs 66 above were:
  - (a) significant;
  - (b) widespread; and/or
  - (c) systemic.

As set out in more detail in Schedule I:

- 1. HSBC Australia received relevant 907 UARs between January 2020 and 30 August 2024.
- HSBC Australia placed Account Restrictions / or a Digital Block on the accounts of 872 Blocked Customers who had reported a UAR to HSBC Australia.
- 3. The mean number of days between HSBC Australia placing Account Restrictions / or a Digital Block and HSBC Australia reinstating full access or use of the Blocked Customer's account is 95 days.
- 4. HSBC Australia took more than 21 days to reinstate full access or use of the Blocked Customer's account in respect of 543 Blocked Customers (62.27% of Blocked Customers).
- 5. HSBC Australia took more than 100 days to reinstate full access or use of the Blocked Customer's account in respect of 324 Blocked Customers (37.16% of Blocked Customers).
- 6. HSBC Australia took more than 200 days to reinstate full access or use of the Blocked Customer's account in respect of 103 Blocked Customers (11.81% of Blocked Customers).
- 7. HSBC Australia only informed 528 Blocked Customers of the process to reinstate full access or use of the Blocked Customer's account (60.55% of Blocked Customers)
- 8. The mean number of days between HSBC Australia placing Account Restrictions / or a Digital Block and advising the Blocked Customer of the process to reinstate full access or use of the Blocked Customer's account is 85 days.
- HSBC Australia took more than 21 days to advise the Blocked Customer of the process to reinstate full access or use of the Blocked Customer's account, in the case of 699 Blocked Customers (80% of Blocked Customers).
- 10. HSBC Australia took more than 100 days to advise the Blocked Customer of the process to reinstate full access or use of the Blocked Customer's account, in the case of 284 Blocked Customers (32.57% of Blocked Customers).
- 11. HSBC Australia took more than 200 days to advise the Blocked Customer of the process to reinstate full access or use of the Blocked Customer's account, in the case of 119 Blocked Customers (13.65% of Blocked Customers).

- 12. For 90% of Blocked Customers, it took HSBC Australia more than 21 days to either advise them of the process to reinstate full use and access of their accounts (for those who were advised at all) or to reinstate full use and access of Blocked Customers' accounts.
- 13. The longest time it took for HSBC Australia to reinstate full use and access of the Blocked Customers' accounts in the period January 2020 to 30 August 2024, was 542 days.

# G BREACHES OF CORPORATIONS ACT AND CREDIT ACT

# G.1 Failure to have adequate controls for the detection and prevention of Unauthorised Payments

- 68 By its conduct in the period from 1 January 2023 to 1 June 2024 of failing to have adequate controls for the prevention and detection of Unauthorised Payments (as set out in paragraph 27 above) HSBC Australia breached its obligations set out in paragraph 26 above to do all things necessary to ensure that:
  - the financial services covered by the AFSL were provided efficiently, honestly and fairly, as required by s 912A(1)(a) and (5A) of the Corporations Act; and
  - (b) the credit activities covered by the ACL were engaged in efficiently, honestly and fairly, as required by s 47(1)(a) of the Credit Act.
- Further or alternatively, by its conduct in the period from 1 January 2023 to 1 June 2024 of failing to have implemented the controls set out in paragraph 27 in the circumstances set out in paragraphs 9 and 28, alternatively paragraphs 9 to 12 and 28, HSBC Australia breached its obligations to do all things necessary to ensure that:
  - (a) the financial services covered by the AFSL were provided efficiently, honestly and fairly, as required by s 912A(1)(a) and (5A) of the Corporations Act; and
  - (b) the credit activities covered by the ACL were engaged in efficiently, honestly and fairly, as required by s 47(1)(a) of the Credit Act.

### G.2 Reports of unauthorised transactions

- 70 By its conduct during the Relevant Period (either individually or in combination):
  - (a) between January 2020 and August 2023, of failing to have adequate systems and processes (as set out in paragraphs 32 to 35 above) to ensure that significant, widespread or systemic non-compliance with the prescribed timeframes in the ePayments Code set out in paragraphs 15(c), 15(d) and 15(f) above did not occur, or otherwise prevent such non-compliance occurring;
  - (b) between January 2020 and October 2023, of failing to have adequate systems and processes (as set out in paragraphs 36(a), 36(b) and 37 above) to ensure that there was not a significant, widespread or systemic failure to consider and/or apply the Liability Rules in conducting its investigation into unauthorised transactions or to refer to the relevant clauses of the ePayments Code when reporting the outcome of investigations to Customers, or otherwise prevent such failures occurring;
  - (c) between January 2020 and November 2024 (or alternatively November 2023), of failing to have adequate systems and processes (as set out in paragraphs 38 to 45 above to identify, track and report the extent to which HSBC Australia was complying with the requirements in the ePayments Code set out in paragraphs 15(c), 15(d) and 15(f),

HSBC Australia failed to do all things necessary to ensure that:

- (d) the financial services covered by the AFSL were provided efficiently, honestly and fairly, in contravention of ss 912A(1)(a) and (5A) of the Corporations Act; and
- the credit activities covered by the ACL were engaged in efficiently, honestly and fairly, in contravention of s 47(1)(a) and (4) of the Credit Act.

#### G.3 Delay in reinstating full use and access of bank accounts

71 By its conduct during the Relevant Period until April 2024 of failing to have adequate systems and processes (as set out in paragraphs 58 to 61 above) to

ensure that there were not significant, widespread or systemic failures to reinstate full access or use of the Blocked Customers' accounts, or to advise the Blocked Customers of the process to reinstate full access or use of their accounts, promptly or within a reasonable period of time (or at all), following the report of an unauthorised transaction, or otherwise to prevent such failures occurring, HSBC Australia failed to do all things necessary to ensure that:

- (a) the financial services covered by the AFSL were provided efficiently, honestly and fairly, in contravention of ss 912A(1)(a) and (5A) of the Corporations Act; and
- (b) the credit activities covered by the ACL were engaged in efficiently, honestly and fairly, in contravention of s 47(1)(a) and (4) of the Credit Act.

# H. RELIEF

72 By reason of the matters referred to above, ASIC seeks the relief set out in the Originating Process.

Date: 13 December 2024

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Signed by Fred Prickett Lawyer for the plaintiff

This pleading was prepared by Fleur Shand of counsel and Paul Liondas KC.

# **Certificate of lawyer**

I Fred Prickett certify to the Court that, in relation to the statement of claim filed on behalf of the plaintiff, the factual and legal material available to me at present provides a proper basis for each allegation in the pleading.

Date: 13 December 2024

Leff

Signed by Fred Prickett

Lawyer for the plaintiff

# Schedule A

# Part A (paragraph 9 – Risk of Unauthorised Payments)

- 1 On about 8 April 2020 and on 15 July 2021, the risk of fraudulent **pass-through** activity associated with Account Takeover was reported to the HSBC Australia Risk Committee [HBA.0001.0001.0418\_0230] and [HBA.0001.0001.0415\_0113]. A pass-through account refers to an account that is opened using stolen or false identification, where the person operating the account in someone else's name utilises it for the purpose of receiving and forwarding proceeds of fraud to another financial institution.
- 2 On 24 July 2020, it was reported to the HSBC Australia WPB Fraud Steering Committee, that since January 2020, HSBC Australia had received an average of 47 fraud pass-through cases a month since January 2020, and that as at 3 July 2020, a total of 300 pass-through accounts were being investigated [HBA.0001.0001.3469\_0015].
- 3 From 24 July 2020 to 23 March 2022, the number or proportion (or both) of money mule / pass-through, Account Takeover, Attempted Account Takeover, Scam, Phishing, Payment Fraud and Remote Access cases which had been reported to the HSBC Australia triage team were reported to the HSBC Australia WPB Fraud Steering Committee, including on 24 July 2020 [HBA.0001.0001.3469 0015]; 21 August 2020 [HBA.0001.0001.3468 0064]; 25 September 2020 [HBA.0001.0001.3473\_0050]; 16 October 2020 [HBA.0001.0001.3472 0046]; 27 November 2020 [HBA.0001.0001.3471 0051]; 21 January 2021 [HBA.0001.0001.0107 0047]; 18 February 2021 [HBA.0001.0001.0106\_0058] 18 March 2021 [HBA.0001.0001.0110\_0075]; 22 April 2021 [HBA.0001.0001.0104 0064]; 20 May 2021 [HBA.0001.0001.0111 0061]; 23 June 2021 [HBA.0001.0001.0109 0058]; 22 July 2021 [HBA.0001.0001.0108 0063] 19 August 2021 [HBA.0001.0001.0105\_0053]; 23 September 2021 [HBA.0001.0001.0113\_0058]; 27 October 2021; [HBA.0001.0001.0112\_0050]; 23 November 2021 [HBA.0001.0001.0132 0050]; 20 January 2022 [HBA.0001.0001.0127 0052]; 17 February 2022 [HBA.0001.0001.0126\_0054]; and 23 March 2022 [HBA.0001.0001.0130\_0052]. A money mule account refers to an account where the account holder is an identified customer of HSBC Australia, but the customer has allowed or facilitated another person to use their account for passthrough activity.
- 4 The WPB Fraud Technology Investment Strategy 2021 dated 15 September 2020 stated that the emerging threats that required investment in Australia were Scams and Account Takeover [HBA.0001.0001.0019\_0002]. This Strategy paper was annexed to the Global WPB External Fraud Strategy dated April 2021 [HBA.0001.0001.0014] reported to the HSBC Group Global WPB Fraud Steering Committee (which was a formal sub-meeting of the Global WPB Financial Crime Risk Management Committee) of which HSBC Australia WPC Fraud Steering Committee was a sub-committee.
- 5 On about 21 January 2021, a Global WPB Financial Crime Risk Management Committee 'Scams Deep Dive' paper dated 6 November 2020 was reported to the Australia (AUH) WPB Fraud Steering Committee

[HBA.0001.0001.0107\_0013], in which it had been assessed that there was a high-level of fraud within Australia, which was one of the indicators of elevated Scam risk [HBA.0001.0001.0018\_0002].

- 6 On 18 February 2021, the AUH WPB Fraud Steering Committee reported that the Financial Crimes Investigation tracker indicated that HSBC Australia Customers had reported in excess of AUD\$3.2 million of Scams related losses in 2020, of which only one reimbursement outcome had been recorded to the value of \$35,950 [HBA.0001.0001.0106\_0024].
- 7 On 18 March 2021, it was reported to the AUH WPB Fraud Steering Committee that there had been recent phishing attempts noted involving Impersonation where fraudsters had attempted to pose as HSBC agents through both SMS and phone, which had been escalated to Fraud Risk to inform the wider business [HBA.0001.0001.0110\_0075].
- 8 From 18 March 2021, the number of Payment Fraud, Account Takeover and Scam cases being investigated by the HSBC Australia Major Investigation team were reported periodically to the AUH WPB Fraud Steering Committee [HBA.0001.0001.0110\_0076], including the Payment Fraud and Account Takeover cases summarised in Schedule C.
- 9 On 15 April 2021, it was reported to the HSBC Australia Risk Committee, that external fraud was considered a material risk due to the continually evolving nature and methods that fraudulent events can occur, with technological advancements, the development of newer ways to perpetrate sophisticated fraud schemes that appear difficult to detect or prevent, and requiring HSBC Australia to continually assess the controls environment is fit for purpose [HBA.0001.0001.0426\_0141].
- 10 On about 15 July 2021, it was reported to the HSBC Australia Risk Committee that there was a significant increase in Scam activity during 2020 noting that WPB Customers had experienced \$3.2 million in losses from Scams in 2020 [HBA.0001.0001.0427\_0015].
- 11 On about 28 October 2021, it was reported to the HSBC Australia Risk Committee that phishing (by email) and Smishing (SMS phishing) attacks were on the constant increase and fake HSBC websites were a consistent thread for fraud actors, increasing globally by 140% in 2021 [HBA.0001.0001.0429\_0256].
- 12 On 21 March 2022, the NPP / Open Banking Project Steering Committee reported that in 2021, there had been \$6.8 million in losses to Customers through Scams, and \$270,000 in net losses though Account Takeover and Payment Fraud, and WPB had observed 1,300 potential pass-through accounts across 2021 [HBA.0001.0001.3661 \_0007].
- 13 On 21 April 2022, the AUH WPB Fraud Steering Committee reported that on average each month, there were approximately 520,000 active users on Mobile Banking or Internet Banking. Of these users, 36% were active on Mobile Banking and 64% were consistently active on Internet Banking [HBA.0001.0001.0124\_0028].

- 14 On 16 August 2022, the AUH WPB Fraud Strategy Workshop records under "Sizing the problem" for Account Takeover (which was defined as Unauthorised Payments with a preceding change to customer information without consent), that it was financially and emotionally detrimental to Customers, and involved real time payment rails [HBA.0001.0001.0086, slide 17].
- 15 In February 2023, the 'External Fraud Management: Strategy Appendix 2022 Performance and Deliverables Assessment' recorded that compared to prior years, Payments and Scam losses have continued to grow, and were now the largest drivers of gross losses, as bad actors continue to target Customers through a range of social engineering and scam vectors [HBA.0001.0001.0067\_0002].
- 16 In March 2023, the 'Fraud Management Update' recorded that: "The bank faces increasing reputational, operational, and financial risks arising from the payment fraud attack. In the past few years, with COVID 19 pandemic impacting the world and consumers adopting to the new ways, there has been a dramatic shift in the payment behaviour via various of digital channels. In ASP [Asia Pacific], it's seeing a dramatically increasing numbers of unauthorised digital payment where the customer credentials and security code being compromised via social engineering, along with the scam / authorised push payment (APP) fraud is also on the rise [HBA.0001.0001.0052\_0004].
- 17 On 9 May 2023, the AUH WPB Fraud Steering Committee reported that a few examples had come through in March of fake HSBC name tags via SMS (Smishing) followed by a call from a scammer, with one successful transaction of \$14k linked to HSBC Impersonation [HBA.0001.0001.0063\_0017].
- 18 In June 2023, the Global WBP External Fraud Strategy recorded that payment and Scam losses had continued to grow, and were now the largest driver of gross losses overall, and "the concentration of banking and messaging services in the customer's mobile device means a compromised device (whether through malware, malicious provisioning or theft) provides a bad actor access to the full suite of capabilities to commit fraud. Mobile devices have become a 'single point of failure' which requires a correspondingly robust set of controls" [HBA.0001.0001.0068\_0010 and 0018].
- 19 On 14 June 2023, AUH WPB Fraud Steering Committee recorded under "emerging trends and risks" that WPB Customers had been targeted by Bank Impersonation scams in 2Q23, under the guise of calling from HSBC's Fraud (or Security) team in combination of spoofed SMS's, scammers have attempted (successfully) to deceive Customers into sharing key security information including OTPs [One Time Passwords] and DSKs [Digital Security Key] which were then utilised for fraudulent spending [HBA.0001.0001.0062\_0020].
- 20 On 13 July 2023, the AUH WPB Fraud Steering Committee, Matthew Hannan, Head of Fraud Management reported in a special presentation about the "HSBC Impersonation Scam", that there had been over 150 Unusual Activity Reports (UARs) raised by Customers, with about 50 individual Customers who had recorded a loss event seeing a potential Customer loss over AUD1 million. Customers had received Smishing (for example SMS containing 'verification codes'). One group behind the Scam, involved the movement of funds to first a

HSBC Australia mule account then remitted to beneficiaries in Pakistan [HBA.0001.0001.0083\_0003 and HBA.0001.0001.0061\_0011.]

- 21 On 20 September 2023, AUH WPB Fraud Steering Committee recorded that in August 2023, HSBC Australia received a total of 88 Scam cases, with 43 (49%) of these being Impersonation scams, compared to March 2023 where HSBC Australia received a total of 35 Scam cases, with 12 (34%) of these being Impersonation scams [HBA.0001.0001.0066\_0023].
- 22 On 19 December 2023, in a report to the HSBC Australia Risk Committee, it was identified that operational risk losses remained outside of risk appetite, which included losses associated with Impersonation scams [HBA.0001.0001.0448\_0010].
- 23 On 8 February 2024, in a risk appetite breach report to the HSBC Australia Risk Committee, it was identified that there were significant matters relating to Impersonation scam reimbursements [HBA.0001.0001.0456\_0061].
- On 29 April 2024, in a report titled "Managing the Risk of Fraud and Scams in WPB" to the HSBC Australia Risk Committee, it was reported that there was an increase in gross Payment Fraud losses (inclusive of Scams) in 2023, which spiked in 4Q 2023 (2.67x increase YoY). For FY2022, total gross Customer losses were \$9 million; and FY2023 \$34million. It was reported that 53% of Customer losses in FY2023 related to Impersonation scam cases (\$18 million). Among the various Payment Fraud typologies, 'unauthorised payment fraud', and 'authorised/scam payment fraud' were the most prominent types impacting HSBC Australia and its Customers. It was also reported that money mules presented an ongoing challenge within the broader financial crime landscape [HBA.0001.0001.0457\_0202].

# Part B (paragraph 32 – HSBC Australia's systems and processes in respect of unauthorised transactions)

- 1 FIM Onshore Team version 1.0.4 dated 3 March 2020 [HBA.0001.0001.1904].
- 2 Global Fraud Operations Procedures for Australia, Fraud Investigations Management Teams, version 1.0 dated March 2020 [HBA.0001.0001.3779].
- 3 Appendix A Creating a Case (Case management system) dated 30 March 2020 [HBA.0001.0001.3787].
- 4 WPB Communications Fraud Awareness: Account Takeovers dated 17 August 2020 [HBA.0001.0001.4591].
- 5 WPB Communications Key Steps for Fraud Recoveries and Internal Contacts dated 3 September 2020 [HBA.0001.0001.4592].
- 6 Global External Fraud Policy dated September 2020 [HBA.0001.0001.1388], April 2021 [HBA.0001.0001.1387], July 2021 [BCB.1000.0001.0524],

14 November 2022 [HBA.0001.0001.1386] and 1 February 2023 [HBA.0001.0001.1390].

- Financial Crime Investigations Global Major Investigations Instructions dated
   29 September 2020 [HBA.0001.0001.1499], 1 June 2021 [HBA.0001.0001.1500],
   1 October 2022 [HBA.0001.0001.1501], 1 June 2023 [HBA.0001.0001.1502].
- 8 Financial Crime Investigations Triage Instructions dated 29 September 2020 [HBA.0001.0001.1504], 1 October 2021 [HBA.0001.0001.1505], and 1 October 2022 [HBA.0001.0001.1506].
- 9 Fraud Classification and Reporting Standards Group Fraud Risk version 3.0 dated November 2020 [BCB.1000.0001.0252] and version 3.6 dated 15 February 2023 [HBA.0001.0001.1395].
- 10 Financial Crime UAR Frequently Asked Questions dated February 2021 [HBA.0001.0001.3752].
- 11 Takeover Certificate for Fraud Typologies (AUH Financial Crime Investigations (FCI) Major Investigations to AUH WPB CCS (Onshore Fraud Investigation Management (FIM) Team)) Australia dated April 2021 [HBA.0001.0001.1903]; which incorporated:
  - (a) an email dated 10 February 2021 re FIM SLA [HBA.0001.0001.1945]; and
  - (b) D.6.1. Global External Fraud Policy Fraud Risk Definitions Appendix [HBA.0001.0001.1944].
- 12 Fraud Operations Quality Group Standards Manual dated 12 January 2022 [HBA.0001.0001.1482].
- 13 Payment Fraud Investigation Procedure Instruction Manual dated version 1.0.1, dated 8 February 2022 [BCB.1000.0001.0304; HBA.0001.0001.3791].
- 14 Financial Crime Unusual Activity Report (FC-UAR) High Risk indicators (HRIs) Enhanced Considerations for Cash Services Part 1 – FC\_UAR dated April 2022 [HBA.0001.0001.4623].
- 15 Financial Crime Unusual Activity Report (FC-UAR) High Risk indicators (HRIs) Enhanced Considerations for Cash Services Part 2 – FC\_UAR dated April 2022 [HBA.0001.0001.4625].
- 16 Fraud Management Scams Investigation, version 1.0, dated October 2022 [HBA.0001.0001.4579].
- 17 International Money Transfers using the HSBC Mobile App Trouble Shooting dated 6 October 2022 [HBA.0001.0001.4590].
- 18 Financial Crime Investigations Australia External Investigative Reporting Instructions version 4.0 dated 15 December 2022 [HBA.0001.0001.1498].
- 19 HSBC Group Fraud Investigations Global Standards Manual dated January 2023 [BCB.1000.0001.0280].

- 20 Case narrative referral template [BCB.1000.0001.0296] dated about January 2023.
- 21 WPB External Fraud Policy dated 25 May 2023 [HBA.0001.0001.1466].
- 22 Guidelines for raising an e-UAR (Unusual Activity Report) dated 11 May 2023 [HBA.0001.0001.3714] and 3 July 2023 [HBA.0001.0001.3701].
- 23 HSBC Group Global Financial Crime Policy version 2.0 dated 31 July 2023 [HBA.0001.0001.1402; HBA.0001.0001.1456].
- 24 HSBC Group Global Financial Crime Policy Standards version 1.0 dated 15 February 2023 [HBA.0001.0001.1403] and version 2.0 dated 31 July 2023 [HBA.0001.0001.1404].

# Part C (paragraph 58 – HSBC Australia's systems and processes in respect of restricted or blocked accounts)

- 1 The terms of Booklet as referred to at paragraphs 21(c) and 22 above.
- 2 How to block an account and PBN dated 16 October 2020 [HBA.0001.0001.3756].
- 3 Distribution Frontline Fraud Respond Procedure Instruction Manual (PIM), v 1.0, dated 26 August 2020 [HBA.001.0001.1669], to v1.4 dated 19 May 2022 [HBA.0001.0001.1673].
- Fraud awareness training deck dated July 2021 [HBA.0001.0001.0229;
   HBA.0001.0001.4599; HBA.0001.0001.4602]; 2022 [HBA.0001.0001.0252;
   HBA.0001.0001.4622], and 2023 [HBA.0001.0001.0247; HBA.0001.0001.4617].
- Handling a Temporary Suspend Username request (KM1089199) dated 30
   August 2021 [HBA.0001.0001.3882], 3 September 2021 [HBA.0001.0001.3883],
   28 March 2021 [HBA.0001.0001.3884], 19 April 2023 [HBA.0001.0001.3885;
   HBA.0001.0001.3886].
- 6 WPB Communications Frontline Staff expectation for Identified Mule/Passthrough Customers and Account Block/Restrictions dated 5 October 2021 [HBA.0001.0001.3880].
- Dealing with fraud suspicion (KM1086869) dated 7 October 2021 [HBA.0001.0001.1487], 11 May 2023 [HBA.0001.0001.3705; HBA.0001.0001.3713] and 6 November 2024 [HBA.0001.0001.0259].
- 8 Block Suspend Services and Account Procedure Instruction Manual (PIM) dated 12 July 2022 [HBA.0001.0001.1850].
- 9 WPB Communications Block, Suspend Services and Account PIM Update dated 22 July 2022 [HBA.0001.0001.3858].

- 10 Fraud Investigations Management Scams Investigation manual, version 1, dated October 2022 [HBA.1000.0001.4579] ; Fraud Investigations Management – Scams – Investigation manual, version 1.0.2, dated August 2023 [BCB.1000.0001.0314].
- Blocking fraud related payments, payment devices, services and accounts Frontline Fraud Respond (KM1119291) dated 23 November 2022 [HBA.0001.0001.3855], 29 November 2022 [HBA.0001.0001.3856] and 25 May 2023 [HBA.0001.0001.3857].
- 12 Suspending and deleting online or phone banking (KM1115441) dated November 2022 [HBA.0001.0001.3889; HBA.0001.0001.3890].
- 13 Overview of Contact list Matrix (KM1088192) dated 28 March 2023 [HBA.0001.0001.3388].
- 14 Handling Fraud and Scams training presentation dated May 2024 [HBA.0001.0001.2069] and July 2024 [HBA.0001.0001.0256].

# Schedule B

# HSBC Australia's identification of controls referred to in paragraph 28

No.	Reference	Date	Relevant control	Quote
1.	HBA.0001.0001.0019, p.2	15 September 2020	SAS EFM Behavioural biometrics Digital fraud device identification	<ul> <li>The 'Global WPB Fraud Steerco WPB Fraud Technology 2021 Investment Strategy' records that "The emerging threats that require investment are Scams, Account Take Over and Cyber Enabled Fraud. Market's the Global Fraud SteerCo has noted as subject to these risks are:</li> <li>Scams: AMH, Australia, Canada, US</li> <li>Account Take Over: Canada, Australia</li> <li>the intention will be for global investment to be focused on: Continued investment in the digital fraud capabilities of PinPoint, Biocatch, Threatmetrix and SAS EFM and mobile application SDKs to improve digital payments protection including scams".</li> </ul>
2.	HBA.0001.0001.3473, p.31	25 September 2020	SAS EFM Behavioural biometrics Digital fraud device identification	<ul> <li>The slide pack for a meeting of the AUH WPB Fraud Steering Committee records that:</li> <li>"Post review of current internal environment against the Global inventory of control instances, FMS has identified (3) material gaps in <b>Payment Fraud</b> detailed below:</li> <li>i) Device ID - A control to ascertain the level of risk a device carries by comparing the device with a database of bad devices.</li> <li>ii) Behavioural Biometrics - A control that analyses the customers online behaviour patterns and compares against known fraudulent behavioural patterns or alerts if the behaviour deviates from the expected behaviour of the customer.</li> <li>iii) Transaction blocking and restriction is implemented where fraudulent activity is identified, to minimize fraud losses for the bank. i.e. system driven transaction interception.</li> <li>Next steps: assessed material gaps have been raised by WPB to ASP for funding in the 2021 AOP wishlist, seeking to deliver Device ID (Threatmetrix), Behavioural Biometrics (BioCatch) &amp; digital transaction interception (SAS eFM).</li> <li>FMS would like to call out NPP Phase 2 (remittance) in 2021 will have an impact to Payment Fraud".</li> </ul>

No.	Reference	Date	Relevant control	Quote
3.	HBA.0001.0001.0015, p.4	6 October 2020	SAS EFM Behavioural biometrics Digital fraud device identification	The 'Global WPB FCRMC External Fraud Deep Dive' records that " <b>Payment Fraud</b> Payment fraud through digital channels continues to see significant increases (+21 % YoY in Jul-20), particularly in the UK, with almost 70% of the UK payment fraud linked to compromises on the mobile channel. The target state control for this type of payment fraud is being delivered through SAS EFM, bringing together payment and card data in one platform and driving richer insights and improved control effectiveness The key additional controls to address issues of payment fraud, as well as the associated emerging risks of Account Takeover and Scams, are being delivered through the combined deployment of behavioural biometrics (BioCatch) digital identity and device protection (ThreatMetrix)
				<b>Account Takeover (ATO)</b> Although ATO event frequency remains low, significant ATO events were seen in late 2018 and 2019 in Canada and Australia that demonstrate the material impact of fraud events that are able to negate our technology. As a result, root cause analysis is being undertaken and global read across has commenced to assess our vulnerability to this risk globally.
				Tactical strategies will be considered in response to the outcome of this read across and our near term strategic response will be to extract additional value from the deployment of behavioural biometrics (BioCatch) and digital identity and device protection (ThreatMetrix) as mentioned under payment fraud above. SAS EFM will provide the orchestration engines in these designs, linking in with Operations to ensure the threat is mitigated end- to-end'.
4.	HBA.0001.0001.0088, p.2	2021	Behavioural biometrics Digital fraud device identification	<ul> <li>The 'Fraud Mitigation Strategic focus 2021' slide pack records that the implementation of:</li> <li>BioCatch and ThreatMetrix (BC/TMX) is currently only for the application journey and does not include transactions.</li> </ul>
			Real time interception	• Payment interception is "Pending update of Internet Banking Platform before investment as reinvestment would be required post update" and that the expected delivery is "TBC".
5.	HBA.0001.0001.1020, rows 17 and 18 ('AUH Gap Analysis' sheet)	5 February 2021	Behavioural biometrics Digital fraud device identification	The 'AUH Scams Control Progress 2021' spreadsheet records, in the 'AUH Gap Analysis' sheet, that In the column "2021 Initiatives in pipeline", the

No.	Reference	Date	Relevant control	Quote
			Real time interception	document records that "ThreatMetrix & BioCatch for Internet / Mobile banking to be included in the Payment journey if funding approved by 2022 year end' and the "2021 Initiatives Timeline" is "TBA". The spreadsheet also records "Real Time GPS Payment Interception" and "Real Time OBS Payment Interception" as being "2021 Initiatives in pipeline".
6.	HBA.0001.0001.0089, pp.4, 5 and 9	18 March 2021	Behavioural biometrics Digital fraud device identification Real time interception	<ul> <li>In the slides of a 'Fraud Mitigation Strategy – Australia Scams overview' presentation, in respect of two "Remote Access scams", it is recorded that there is "no real time interception or payment holding to clarify suspicious transaction content with customer' and "Behavioural Biometrics currently not implemented to transaction journey (Biocatch)". The same document records in respect of "Remote Access Scams" the implementation of:</li> <li>Behavioural Biometrics which is "[c]urrently under CTA 8 requires funding c.\$500k" and has an expected delivery of 2022; and</li> <li>real time payment interception which is "[c]urrently under CTA 8 requires funding c.\$380k and will be tied to NPP" and has an expected delivery of 2022.</li> </ul>
7.	HBA.0001.0001.0108, pp.37, 38, and 71	22 July 2021	Behavioural biometrics Digital fraud device identification Real time interception	The slide pack for a meeting of the AUH WPB Fraud Steering Committee provides an update under the deliverable " <i>BioCatch/Threat Metrix on Transaction Payments</i> ", the status of which is listed as <i>"in progress"</i> with the following note: The document later records that the deployment of Biocatch and Threatmetrix <i>"is currently only for the application journey and does not include transactions"</i> . The slide pack also records that the status of <i>"Real Time Payment Interception"</i> is <i>"in progress"</i> with a note: The document later records that the status of <i>"Interception"</i> is <i>"in progress"</i> with a note: The slide pack also records that the status of <i>"Real Time Payment Interception"</i> is <i>"in progress"</i> with a note: The document later records that <i>"Current HSBC Fraud Prevention systems cannot intercept transactions before completion"</i> and that implementation is <i>"[p]ending update of Internet Banking Platform before investment as reinvestment would be required post update"</i> . The expected delivery of this item is listed as <i>"TBC"</i> .
8.	HBA.0001.0001.0105, p.5	22 July 2021	Real time interception	The minutes of the AUH WPB Fraud Steering Committee meeting record that "[r]eal time capability isn't possible until Payment Interception for Banking Transactions is

No.	Reference	Date	Relevant control	Quote
				implemented; Scheduled for 2022" and it was resolved that a "[r]eal time model be implemented as part of system requirements in 2022".
9.	HBA.0001.0001.0105, pp.29-30	19 August 2021	Real time interception Behavioural biometrics SAS EFM	The slide pack for a meeting of the AUH WPB Fraud Steering Committee records in the "NPP Phase 2 Discussion paper" that there is "[n]o real-time payment interception capability for internet banking transactions, at present" and lists the following consideration for NPP Phase 2: "Ensure that both real time payment interception, along with in-session behavioural biometrics capability has been integrated with SAS EFM, to cover banking prior to go live of Phase2. This will enable Fraud Operations to review suspicious attempted transfer/s and discuss suspicious details with customer real-time".
10.	HBA.0001.0001.0113, p.66 (23 Sep 21) and HBA.0001.0001.0112, p.57 (27 Oct 21)	23 September 2021 and 27 October 2021	Behavioural biometrics Digital fraud device identification Real time interception	The slide packs for the meetings of the AUH WPB Fraud Steering Committee on 23 September 2021 and 27 October 2021 record that the deployment of Biocatch and Threatmetrix " <i>is currently only for the application journey and does not include</i> <i>transactions</i> ", that the implementation of payment interception is " <i>Pending update of</i> <i>Internet Banking Platform before investment as reinvestment would be required post</i> <i>update</i> " and that the expected delivery is " <i>TBC</i> ".
11.	HBA.0001.0001.0127, p.27	20 January 2022	Behavioural biometrics Digital fraud device identification Real time interception SAS EFM	The slide pack for a meeting of the AUH WPB Fraud Steering Committee records that "DSP [Digital Security Platform] delayed to Q3 2022. Will directly impact key fraud prevention initiatives such as BioCatch & ThreatMetrix screening capabilities for transactions – which is key for fraud prevention for the NPP and Global Money projects. Without BC/TMX the Real time payment interception in SASEFM will continue to be rule based, which will likely result in high false positive rates thereby impacting customer experience".
12.	HBA.0001.0001.0115, p.11	20 January 2022	Behavioural biometrics Digital fraud device identification	The minutes of the AUH WPB Fraud Steering Committee on 20 January 2022 record a business case discussion for and that HBAU has identified that - A business case is being brought forward to Global team to

No.	Reference	Date	Relevant control	Quote
				highlight the needs and benefits of <b>an an a</b>
13.	HBA.0001.0001.0130, pp.28 and 57	23 March 2022	Real time interception Behavioural biometrics Digital fraud device identification SAS EFM	The slide pack for a meeting of the AUH WPB Fraud Steering Committee records under "NPP Phase 2 – WPB Fraud Strategy Mobile" that "[r]eal-time payment interception integrated with SAS EFM and GPPSP — full timeline currently being finalised for SEP22 implementation" and BioCatch and ThreatMetrix had been "added to the DSP [Digital Security Platform] workflow, enabling increased sophistication of our fraud screening" with potential implementation in December 2022. The document later records that "Biocatch gaining traction in AUH market with competitors — CBA recently announced broad rollout, joining several other users. User
				Group established in AUH".
14.	HBA.0001.0001.0124, pp.28 and 32	21 April 2022	Behavioural biometrics Digital fraud device identification Real time interception	The slide pack for the AUH WPB Fraud Steering Committee dated 21 April 2022 records in a 'SCAM Awareness Strategy' paper, "[I]ocal FI's inclusive of HSBC have been working with the Australian Banking Association (ABA) to review and formulate policy to guide the future landscape of SCAM handling. Adding to this pressure, is the swiftness of funds movement when perpetrated through the New Payments Platform (NPP) essentially reducing ability to recover funds.
				There are a number of ways we can attempt to minimise the impact on victims, through which HSBC specifically is looking to tackle:
				Uplift in Real-time transaction interception capability
				Biometrics and device monitoring at a transaction level".
				In a "Group Fraud Policy Dispensation, Annual Renewal", the document records "A dispensation was approved by local FCRMC 22nd April 2021 allowing for Group Fraud to proceed approval for a 12-month period however, as this time is due to lapse there is a requirement for this to be renewed and tabled as a "noting item" for the local RMF scheduled in 22nd April 2022.
				<u>Behavioral Biometrics</u> As one of the minimum authentication control requirements, Behavioral Biometric data is required to be collected to support customer on registration, provision and login to digital banking. To meet this requirement, we will need to move to DSP [Digital Security Platform]/Banking 2.0 in conjunction with the extension of the

No.	Reference	Date	Relevant control	Quote
				Biocatch tool. This is looking to occur between 0421 and 0122. Therefore, this dispensation covers Australia for a further 12 months against the policy.
				Device Identification (Login) , which is considered part of the mandatory data elements for digital banking, although we do have mitigating controls in place, the future move to DSP/Banking 2.0 will allow this gap to be closed. On top of this funding is being secured for "Threatmetrix" to also be deployed however, reliant on DSP upgrade. As a result, this dispensation gives us breathing space for the next twelve months against policy, noting we have other mitigating controls".
15.	HBA.0001.0001.0121, p.9	21 April 2022	Behavioural biometrics Digital fraud device identification	The minutes of the AUH WPB Fraud Steering Committee record that with respect to the 'Group Fraud Policy Dispensation – Annual Review', "Purpose is to request dispensation extension for inability to meet Group Fraud Policy. Dispensations to be renewed are Behavioural Biometrics", "Device Identification (Registration)" and "Device Identification (Login)" deployment has been delayed "due to technology [the] DSP [Digital Security Platform]/Banking 2.0 Platform".
16.	HBA.0001.0001.0199	June 2022	Real time interception Behavioural biometrics Digital fraud device identification	The 'Fraud Controls Framework - Mobile' for Payment Fraud records , and for Payment Fraud through Mobile Banking.
17.	HBA.0001.0001.0128, p.12	18 July 2022	Real time interception Behavioural biometrics Digital fraud device identification	The minutes of the AUH WPB Fraud Steering Committee record that real-time payment interception is expected to be implemented by November and Q1 (Feb-March 2023) for BC/TM.
18.	HBA.0001.0001.0086, pp. 7 and 36	16 August 2022	SAS EFM Behavioural biometrics	The 'AUH WPB Fraud Strategy Workshop' records for the 'Fraud Strategy 2022', " <i>tools pending delivering</i> " include BioCatch for Transactions, Realtime Payment Interception – HUB, and Threatmetrix for Transactions.

No.	Reference	Date	Relevant control	Quote
			Digital fraud device identification Real time interception	The 'Strategic Fraud Analytics landscape for Australia 2022-23' records that for "Payments Fraud / Scams" (Detect unauthorised payments from Bank account, protect customers' & Bank against financial loss), the "Strategic plan" is for "[p]revention to be enabled leveraging SAS EFM real time interception capability across all payment journeysDevelop rules using TMX & Biocatch Models to work in conjunction to detect Payments Fraud – Timeline for pipeline set up between SAS EFM & TMX/BC : To be confirmed by Hariom & Team".
19.	HBA.0001.0001.0133, p. 54	21 October 2022	Real time interception Behavioural biometrics Digital fraud device identification	<ul> <li>The slide pack for a meeting of the AUH WPB Fraud Steering Committee records for the <i>"Fraud Workshop"</i> that the following tools were <i>"pending delivery"</i>:</li> <li><i>"BioCatch for transactions, BioCatch for transactions will implement the same behavioural input and interaction analytics that we have for applications and apply it to would be customers transferring funds online"</i> and implementation was <i>"(Mobile) On Track, (Browser) Pending, Banking 2.0 — No Schedule"</i>.</li> <li><i>"Realtime Payment Interception for HUB, [c]urrently, HSBC do not have the capability to stop an online transfer of funds from one bank account to another. Realtime Payment Interception for HUB would allow for our, currently alert only rules, to stop transactions where certain criteria is met."</i> and implementation was <i>"(Mobile) [is] On Track."</i> and that <i>"(Browser) [is] Pending Banking 2.0 No Schedule"</i>.</li> <li><i>"Threatmetrix for Transactions ThreatMetrix for transactions is a monitoring tool applied utilising digital identity insights and analysis sourced from activity across the industry"</i> and implementation was <i>"(Mobile) On Track, (Browser) Pending, Banking 2.0 — No Schedule"</i>.</li> <li><i>The same information is replicated in the 22 November 2022 edition of the slides.</i></li> </ul>
20.	HBA.0001.0001.0119, p.9	21 October 2022	Behavioural biometrics Digital fraud device identification	The minutes of the AUH WPB Fraud Steering Committee record that: "( <i>BC/TMX</i> ) - On track. With Tech release expected for end of Nov… Potential delay with an IT embargo in dec and impact to IT support for the release… Potential to moved to 10 Jan. This could affect other implementations such as NPP and Global Money".
21.	HBA.0001.0001.0022, pp.26 and 52	22 November 2022	Behavioural biometrics Digital fraud device identification	The slide pack for a meeting of the AUH WPB Fraud Steering Committee records that for "Existing to Bank (BC/TMX)" the "The Global pods have confirmed that Tech go Live cannot be completed in November and have pushed the release to 10th Jan 2023".

No.	Reference	Date	Relevant control	Quote
				"Biocatch for Transactions" and "Threatmetrix for Transactions" is "On track" for Mobile and is "Pending Banking 2.0 - No Schedule" for Browser.
22.	HBA.0001.0001.0060, p.7	22 November 2022	Real time interception	The minutes of the AUH WPB Fraud Steering Committee meeting on 22 November 2022 record that Matthew Hannan, Head of Fraud Risk, "raise[d] potential risk in unauthorised payment fraud as our most recent loss is likely to put us over 500k in losses. Notes that cause of majority of these losses is related to fraudsters passing HRVQ, resetting DSK, and getting online. Suggests we can look at these in 2023'. Gavin Papworth, Senior Fraud Mitigation Manager, is recorded as responding that "we have real-time payment interception that is likely to help" to which Mr Hannan agreed and "notes real-time notification of change of details is likely to help as well".
23.	HBA.0001.0001.0067, p.4	February 2023	Behavioural biometrics Digital fraud device identification Real time interception	The 'External Fraud Management: Strategy Appendix – 2022 Performance and Deliverables Assessment' records that BioCatch and ThreatMetrix capabilities have been deployed across
24.	HBA.0001.0001.0052, p.8	March 2023	Behavioural biometrics Digital fraud device identification Real time interception	The 'Fraud Management Update' records that the key initiatives that will be carried out in 2023 (subject to the final funding allocation) for the Payment Fraud Strategy, included " <i>Build the payment interception capability for all payment types</i> ", including for HSBC Australia, and that the funded fraud VSIP capabilities as at 16 February 2023 for Australia included the " <i>Biocatch/Threatmetrix - Payments Mobile / Web</i> " project which had funding of \$200,000 USD and the " <i>real time interception-payments</i> " project which had funding of \$100,000 USD.
25.	HBA.0001.0001.0197	May 2023	Behavioural biometrics Digital fraud device identification	The 'Fraud Controls Framework - Browser' for Payment Fraud records '
			Real time interception	for Payment Fraud through Online Banking.

No.	Reference	Date	Relevant control	Quote
			SAS EFM	
26.	HBA.0001.0001.0200	May 2023	Behavioural biometrics Digital fraud device identification Real time interception SAS EFM	The 'Fraud Controls Framework - Mobile' for Payment Fraud records
27.	HBA.0001.0001.0063, pp.16-17	9 May 2023	Behavioural biometrics Digital fraud device identification	The slide pack for a meeting of the AUH WPB Fraud Steering Committee records that for "(BC/TMX - Mobile Payments)", "[c]alibration continues post 29MAR with tranches of customers migrating to DSP [Digital Security Platform], further providing data to support calibration which has been cut short by almost a month. These tools support NPP as one of the mandatory requirements". Under the subheading "Low Risk FIM Dispensations", it is recorded that "[I]ocal approvals received to support extension of Low Risk FIM Dispensations for another 12 months, due to BC/TMX tools currently not deployed on Browser journey (requires Banking 2.0 to be rolled out)".
28.	HBA.0001.0001.0068, p.17	June 2023	Behavioural biometrics Digital fraud device identification Real time interception	The 'Global WBP External Fraud Strategy' records that in relation to "The risk of increasing unauthorised payment fraud", "the ongoing deployment of strategic tools such as BioCatch and TMX have increased the effectiveness of our unauthorised payment fraud controls, offsetting the additional risks stemming from propositional enhancements introducing real time, cross-border payment functionality, which have the potential to increase the inherent risk of payment fraud by making it harder to trace, inhibit and recover stolen funds".
29.	BCB.1000.0001.0277, p.3	June 2023	Behavioural biometrics Digital fraud device identification Real time interception	As part of the Scam Strategy and Control Framework, for the detection of scam payments and Smishing, Vishing, and Phishing activity.
30.	HBA.0001.0001.0062, p.17	14 June 2023	Behavioural biometrics	The slide pack for a meeting of the AUH WPB Fraud Steering Committee records that HSBC Australia's gap assessment against the ABA Scam Guidelines indicated that

No.	Reference	Date	Relevant control	Quote
			Digital fraud device identification	"[b]anking 2.0 Implementation [is] required in order to have Biocatch and Threatmetrix deployed consistently across all Digital Payments channels".
31.	HBA.0001.0001.0061, p.11	13 July 2023	Behavioural biometrics Digital fraud device identification	The slide pack for a meeting of the AUH WPB Fraud Steering Committee records in a special presentation on the " <i>HSBC Impersonation Scam</i> " involving Impersonation and Smishing from scammers who were purporting to be from HSBC, with potential customer losses of over \$1 million, that "[ <i>I</i> ]ack of Biocatch and Threatmetrix capability on Desktop ( <i>PIB</i> ) significantly impacts our detective and preventative capability— dependency is Banking 2.0 for Move Money".
32.	HBA.0001.0001.0083, p.3	13 July 2023	Behavioural biometrics Digital fraud device identification SAS EFM	The minutes of the AUH WPB Fraud Steering Committee meeting record that Matthew Hannan, Head of Fraud Management reported in relation to "HSBC Impersonation Scam" that "[c]hallenges [are] arising from the management of this risk: Inconsistent coverage of contextual data tools (BC/TM X) being not deployed In browser, payment rules deployed have been blunt to date as a result of limited systems and tools capabilities which have prevented precision rules".
33.	HBA.0001.0001.0066, pp.17 and 19	20 September 2023	Real time interception SAS EFM	<ul> <li>The slide pack for a meeting of the AUH WPB Fraud Steering Committee records under the subheading "Impersonation Scams" that "Current limitations on desktop banking monitoring and real-time interception are impacting our ability to disrupt and prevent these attacks".</li> <li>The document also records that "FA [Fraud Analytics] is working on various payment strategies against the increase of impersonation scam cases along with FM [Fraud Management] team (few rules have been implemented before for overseas countries via real time channel)".</li> </ul>
34.	HBA.0001.0001.0150, pp.16 and 23	6 November 2023	Behavioural biometrics Digital fraud device identification Real time interception	The slide pack for the AUH Scams Capability Uplift – Steering Committee meeting records that tools for " <i>Detect</i> " included " <i>Payment delays</i> " including implementing " <i>real</i> <i>time interception</i> " and, under " <i>Uplift and Integrate Technical tools</i> ", It also recorded as . Regarding these " <i>key tools</i> " the document records that " <i>[f]unding is not approved</i> " and that a " <i>[d]ependency</i> " is " <i>[p]otentially 2.0 rollout</i> ".

No.	Reference	Date	Relevant control	Quote
35.	HBA.0001.0001.0180, rows 119 and 132	14 November 2023	Behavioural biometrics Digital fraud device identification Real time interception	The 'Scams Scope - Convergent Assessment' spreadsheet records under " <i>Detect</i> " controls that Threatmetrix and BioCatch are yet to be implemented for Internet Banking. The document notes that deployment " <i>Must</i> " occur and is identified as a system " <i>Gap</i> ". The spreadsheet also lists under the " <i>Detect</i> " controls that " <i>Implement real time interception</i> " was a " <i>Must</i> " that " <i>[e]xists but needs work</i> ".
36.	HBA.0001.0001.0152, pp.5, 6 and 7	4 December 2023	Behavioural biometrics Digital fraud device identification Real time interception	<ul> <li>The slide pack for a meeting of the AUH Scams Capability Uplift – Steering Committee records that \$350,000 (USD) funding is required for Threatmetrix and BioCatch.</li> <li>Under "Detection", the document records that "Real-time Interception – payment holds/delays" and "Implement Biocatch/Threatmetrix on Desktop" were funded, but the latter was "depending upon Banking 2.0 vs GSP [Global Service Platform] status".</li> <li>Under the heading "The Biggest Change is Getting Real Time Intercept, Threatmetrix (TMX) and BioCatch (BC) on Desktop", the document records that "1.5m" and "6 months" is needed "[t]o roll out internet banking 2.0 in Australia" that a further "400k" is needed for "Real Time Intercept" and "350k" for "ThreatMetrix and BioCatch". The document then records that "[u]ntil this happens FIM cannot disrupt scams and losses will continue to mount".</li> </ul>
37.	HBA.0001.0001.0059, pp.11,17 and 20	12 December 2023	Digital fraud device identification SAS EFM	The slide pack for a meeting of the AUH WPB Fraud Steering Committee records that in relation to Impersonation scams, " <i>TMX coverage of browser logon journey via DSP</i> [Digital Security Platform] implemented ahead of schedule (4Q23) — currently undergoing model approval to enable usage in rules". It also records that "… <i>Fraud Management has deployed a series of rules in an effort to prevent and detect customer losses from scams -subject to the technical capabilities available across different payment channels.</i> Accounts exhibiting risky transactions are monitored through rules loaded into SAS EFM that determines these risky exit channels by elements such as (but not limited to): [Intermediate the customer losses from scams -subject to the technical capabilities] As an example — rules have recently been enacted specifically regarding spend at known crypto exchange-related BSBs (decline on mobile, alert on browser). The intent is to

No.	Reference	Date	Relevant control	Quote
				continue to uplift the sophistication of these rules and their associated level of friction as and when the capability becomes available.
				FA [Fraud Analytics] is working on various payment strategies against the increase of impersonation scam & also mule cases along with FM team (few rules have been implemented before for overseas countries via real time channel)".
38.	HBA.0001.0001.0141, p.12	25 January 2024	Behavioural biometrics Digital fraud device identification Real time interception	The slide pack for a meeting of the AUH WPB Fraud Steering Committee records the following under the heading "4.1.1 Fraud Management Update" for BioCatch/ThreatMetrix on NPP: "[t]he digital feeds strengthen fraud detection systems and provides enhanced data to improve the fraud decision-making processes. It's absence has underscored this component and has impacted the level of sophistication in identifying and intercepting potential fraudulent transactions via Mobile App on the NPP railDuring the period Payment fraud feeds and real-time interception were working as expected. However, without Digital Fraud feeds & BC/TMX the fraud decision making did not leverage additional data such as device information Fix implementation plan has been agreed between all parties, targeted for production release on 4-Feb-24".
39.	HBA.0001.0001.0189, pp.2, 5 and 8	February 2024	Behavioural biometrics Digital fraud device identification Real time interception	The slide pack titled 'WPB Scams and Fraud – Timeline of work undertaken February 2024' records that key technology deployments include " <i>BioCatch/TMX</i> <i>deployed to Mobile</i> " in May 2023. It also records that Threatmetrix was deployed on login on Desktop banking and mandatory facial biometrics across DCO (transactional accounts) over October to December 2023. The document also records that " <i>Today, the expected spending in 2024 is ~USD12m.</i> and that " <i>Key Tech Deployments</i> " are
40.	HBA.0001.0001.0090, p. 5-6	13 March 2024	Behavioural biometrics Digital fraud device identification Real time interception	The 'HBAU WPB Fraud Risk Management Strategy' records that as of February 2024 the following initiative is complete: " <i>Refined mule/scam rules in SASefm</i> " with the description: " <i>Implemented new rules and refined existing SASefm scam rules to detect scam activity. Real-time interception capability needed on desktop to use these rules more effectively to prevent scams</i> ".

No.	Reference	Date	Relevant control	Quote
			SAS EFM	Fraud and Scam initiatives in progress under "prevention" capability include "BioCatch and ThreatMetrix for desktop (already deployed on mobile) are required to be deployed on desktop to provide channel agnostic coverage of behavioural/device contextual data to aid in scam detection". Fraud and Scam initiatives under "detection" capability include "[e]xpansion of current real-time interception capability to include payment holds and declines across all payment channels". Each of these controls had a target date of 2Q 2024.
41.	HBA.0001.0001.0192, p.1	April 2024	Real time interception	The 'HSBC Australia – Scams and Fraud report' provided to HBAP (The Hongkong and Shanghai Banking Corporation Limited) Risk Committee records that: "HBAU experienced an increase in gross payment fraud losses (incl. scams) in 2H23 (267% increase YoY; \$16m between FY22 and FY23) [f]rom a detection perspective, the two highest priority gaps that remain are real-time interception capability for domestic desktop (browser/GSP [Global Service Platform]) payments and HSBC-HSBC mobile payments. Both gaps are being addressed with in-flight projects with target delivery date in MAY24'.
42.	HBA.0001.0001.0193, pp.4-6 and 10	April 2024	SAS EFM Behavioural biometrics Digital fraud device identification Real time interception	The slide pack for the 'Australia Fraud and Scams - Management Response' records under "refined mule/scam rules in SAS EFM", that it had "Implemented new rules and refined existing SASefm scam rules to detect scam activity. Real-time interception capability needed on desktop to use these rules more effectively to prevent scams", and later that "Work continues on optimising and refining rules targeted towards both scam detection and mule identification". It also records that "Biocatch and Threatmetrix (already deployed on mobile) are required
				to be deployed on desktop to provide channel agnostic coverage of behavioural/device contextual data to aid in scam detection", with a target date of 2Q 2024, and a target date had been set for 2Q 2024 for the "[e]xpansion of current real-time interception capability to include payment holds and declines across all payment channels".
43.	HBA.0001.0001.0140, pp.15-16	12 April 2024	Behavioural biometrics Digital fraud device identification Real time interception SAS EFM	The slide pack for a meeting of the AUH WPB Fraud Steering Committee, under the heading "Scam Initiatives - WPB Fraud Management", records the prevention initiative of "BioCatch and ThreatMetrix Risk Assessment for Payments on Desktop Banking" with the description: "(Banking 2.0 Payment journey dependent) Biocatch and Threatmetrix (already deployed on mobile) are ASP Fraud required to be deployed on desktop to provide product channel agnostic coverage of behavioural/device contextual data to aid in scam detection", with a cost of USD 350K.

No.	Reference	Date	Relevant control	Quote
				The document also records a detection initiative of "real time interception capability for payments" with the description: "[e]xpansion of current real-time interception capability to include payment holds & declines across all payment channels (GSP [Global Service Platform] + MX [Mobile X])", with a cost of USD 400K.
				The Fraud Analytics team are recorded as reporting that in January and February "several banking rules have been deployed for ATO, SCAM pattern such as The rules are expected to prevent the ongoing fraud/scam cases however, it will increase the alert volume in coming months".

## Schedule C

# Payment Fraud/ Account Takeover cases (including unauthorised transactions) – reported by the FCMI team to AUH WPB Fraud Steering Committee for the period March 2021 to March 2024

Reporting period	Nur	nber of ope	en Payment	Fraud (PF	) and Acco	ount Takeo	ver (ATO) o	ases	Report date	Reference
	0-89	days	90-18	0 days	>180	days	Total r	number		
	PF	ΑΤΟ	PF	ΑΤΟ	PF	ΑΤΟ	PF	ΑΤΟ		
March 2021	7	8	6	7	1	5	14	20	18 March 2021	HBA.0001.0001.0110
April 2021	7	6	6	12	2	6	15	24	22 April 2021	HBA.0001.0001.0104
May 2021	7	8	7	8	3	10	17	26	20 May 2021	HBA.0001.0001.0111
June 2021	6	8	4	8	3	8	13	24	23 June 2021	HBA.0001.0001.0109
July 2021	8	15	5	4	2	2	15	21	22 July 2021	HBA.0001.0001.0108
August 2021	8	19	4	5	2	2	14	26	19 August 2021	HBA.0001.0001.0105
September 2021	12	15	5	10	1	3	18	28	23 September 2021	HBA.0001.0001.0113
October 2021	13	10	4	12	1	2	18	24	27 October 2021	HBA.0001.0001.0112
November 2021	10	8	1	7	0	1	11	16	23 November 2021	HBA.0001.0001.0132
January 2022	13	21	2	3	0	1	15	25	20 January 2022	HBA.0001.0001.0127
February 2022	13	21	3	6	0	1	16	28	17 February 2022	HBA.0001.0001.0126
March 2022	15	14	6	6	0	1	21	21	23 March 2022	HBA.0001.0001.0130

Number of open Payment Fraud (PF) and Account Takeover (ATO) cases **Reporting period** Report date Reference 0-89 days 90-180 days >180 days Total number ΑΤΟ PF ΑΤΟ PF ΑΤΟ PF ΑΤΟ PF 7 April 2022 5 9 0 0 21 April 2022 HBA.0001.0001.0124 15 22 14 April 2022 15 5 7 9 0 0 22 14 23 May 2022 HBA.0001.0001.0131 5 8 June 2022 3 8 3 0 0 HBA.0001.0001.0129 11 22 June 2022 5 5 July 2022 1 3 0 0 0 4 18 July 2022 HBA.0001.0001.0128 6 2 0 0 0 3 0 August 2022 1 23 August 2022 HBA.0001.0001.0125 11 0 0 4 12 21 October 2022 September 2022 4 0 1 HBA.0001.0001.0133 October 2022 13 N/A N/A 0 N/A N/A 1 14 22 November 2022 HBA.0001.0001.0022 12 3 0 1 4 16 January 2023 0 28 February 2023 HBA.0001.0001.0060 4 April 2023 7 5 0 4 0 0 7 9 9 May 2023 HBA.0001.0001.0063 May 2023 5 5 1 11 14 June 2023 HBA.0001.0001.0062 1 0 5 4 June 2023 1 5 3 2 0 1 4 8 13 July 2023 HBA.0001.0001.0061 2 N/A 2 N/A 0 0 N/A 20 November 2023 HBA.0001.0001.0064 November 2023 N/A January 2024 N/A 4 N/A 2 N/A 0 N/A 6 25 January 2024 HBA.0001.0001.0141

## Schedule D

### Scams and Payment & Cheque cases including unauthorised transactions – reported by the FIM team to AUH WPB Fraud Steering Committee for the period September 2022 to December 2023

Reporting period	Rece cases				under i C) case		ation fo	or Scam	s (SC)	and Pa	yment 8	k	Com case	npleted es	Report date and Doc ID
			0-20			days	53+ c	lays	Tota num		% out 53-da SLA (italici % not report	<b>ys</b> ized if			
	SC	P/C	SC	P/C	SC	P/C	SC	P/C	SC	P/C	SC	P/C	SC	P/C	-
September 2022	33	7	23	15	31	6	0	1	49	22	0%	5%	31	1	21 October 2022 HBA.0001.0001.0133
October 2022	31	19	22	11	32	12	2	3	56	26	4%	9%	30	7	22 November 2022 HBA.0001.0001.0022
January 2023	39	17	23	13	28	5	38	4	89	22	43%	18%	26	0	28 February 2023 HBA.0001.0001.0060
April 2023	43	12	22	7	43	10	55	1	120	18	46%	6%	24	14	9 May 2023 HBA.0001.0001.0063
May 2023	42	11	27	4	45	10	66	7	138	21	48%	33%	24	9	14 June 2023 HBA.0001.0001.0062
June 2023	51	12	30	10	46	8	71	5	147	23	48%	22%	51	12	13 July 2023 HBA.0001.0001.0061
July 2023	53	14	26	7	52	16	94	13	172	36	55%	36%	22	3	16 August 2023 HBA.0001.0001.0058
August 2023	88	14	76	12	52	7	118	19	246	38	48%	50%	28	1	20 September 2023 HBA.0001.0001.0066

Reporting period	Rece cases				under i C) case		ation fo	or Scam	ns (SC)	and Pa	yment &	<u>k</u>	Com case	pleted s	Report date and Doc ID
			0-20	days	21-53	days	53+ c	lays	Tota num		% out 53-da SLA (italicu % not report	ized if			
September 2023	SC	P/C	SC	P/C	SC	P/C	SC	P/C	SC	P/C	SC	P/C	SC	P/C	-
	72	8	30	4	83	11	196	32	309	47	63%	68%	14	0	18 October 2023 HBA.0001.0001.0138
October 2023	106	6	73	3	91	10	247	39	411	52	60%	75%	5	1	20 November 2023 HBA.0001.0001.0064
November 2023	154	9	64	3	144	6	305	44	513	53	59%	83%	20	5	12 December 2023 HBA.0001.0001.0059
December 2023	163	10	24	3	197	9	433	49	652	61	66%	80%	58	4	25 January 2024 HBA.0001.0001.0141

## Schedule E

Scams/fraud and payment & cheque cases including unauthorised transactions – reported by the FIM team to the AUH EXCO Scams Forum and AUH WPB Fraud Steering Committee for the period March 2024 to October 2024

Reporting date			0	pen ca	ses un	der inv	estigat	ion for	Scams	s (SC) a	nd Pay	ment 8	& Cheq	ues (P/	C) case	s			Report date and Doc
uale	0-21 days		22-45	days	46-52	days	53-90	days	91-12 days	0	121+ days		% of t 21 da (italici % not report	zed if	% of t 45 day (italici % not report	<b>ys</b> zed if	Total	open	
	SC	P/C	SC	P/C	SC	P/C	SC	P/C	SC	P/C	SC	P/C	SC	P/C	SC	P/C	SC	P/C	
27 March 2024	29	7	79	4	27	0	139	6	144	10	351	42	96%	90%	86%	84%	769	69	28 March 2024, HBA.0001.0001.0170
2 April 2024	32	5	39	7	35	1	158	5	128	9	364	42	96%	93%	91%	83%	756	69	4 April 2024, HBA.0001.0001.0171
9 April 2024	24	2	29	8	16	3	141	3	76	7	430	54	97%	97%	93%	87%	716	77	12 April 2024, HBA.0001.0001.0140
5 May 2024	19	5	13	16	3	3	76	9	95	4	354	44	97%	94%	94%	74%	560	81	9 May 2024, HBA.0001.0001.0208
12 May 2024	26	3	22	16	4	5	48	9	73	4	318	45	95%	96%	90%	77%	491	82	16 May 2024, HBA.0001.0001.0204

Reporting date			0	pen ca	ses un	der inv	estigat	ion for	Scams	s (SC) a	nd Pay	ment &	& Cheq	ues (P/	C) case	es			Report date and Doc
uale	0-21 days		22-45	days	46-52	days	53-90	days	91-12 days	0	121+ days		% of t 21 da (italici % not report	<b>ys</b> zed if	% of t 45 da (italici % not report	<b>ys</b> zed if	Total	open	
	SC	P/C	SC	P/C	SC	P/C	SC	P/C	SC	P/C	SC	P/C	SC	P/C	SC	P/C	SC	P/C	
May to June 2024	4	8	6	13	0	2	10	16	2	7	78	42	96%	91%	90%	76%	100	88	25 June 2024, HBA.0001.0001.3464
11 August 2024	11	4	0	9	0	0	0	2	0	2	0	5	0%	82%	0%	41%	11	22	30 August 2024, HBA.0001.0001.3462
15 September 2024	10	5	2	4	1	1	0	2	0	1	0	0	30%	62%	8%	31%	13	13	19 September 2024, HBA.0001.0001.3467
6 October 2024	15	4	0	7	0	0	1	0	0	0	0	0	6%	64%	6%	0%	16	11	18 October 2024, HBA.0001.0001.3466

## Schedule F

#### Delay in completing investigation of UARs

Row	(a) UCM reference	(b) Date HBAU received UAR	(c) Date HBAU required to either complete Investigation/ or advise Investigation Outcome (21 days)	(d) Date of Extra Time Request (where made)	(e) Date HBAU completed its Investigation	(f) Number of days taken to complete Investigation	(g) Did HBAU make Extra Time Request or complete Investigation within 21 days (Yes/No)	(h) Date HBAU required to complete Investigation (45 days) where applicable	(i) Date HBAU advised Investigation Outcome	(j) Did HBAU complete Investigation within 45 days (Yes/No)	(k) Did HBAU advise Investigation Outcome within 45 days (Yes/No)	(I) Did HBAU refer to Liability Rules in completing its Investigation (Yes/No)	(m) Did HBAU refer to Liability Rules in its Investigation Outcome (Yes/No)
1.	C200119373352	21/01/2020	11/02/2020	U <sup>1</sup>	26/11/2020	310	No	6/03/2020	U	No	No	No	NP <sup>2</sup>
2.	C200219763893	27/03/2020	17/04/2020	U	17/12/2020	265	No	11/05/2020	3	No	No	No	NP
3.	C200219887886	28/02/2020	20/03/2020	U	24/08/2020	178	No	13/04/2020	U	No	No	No	NP
4.	C200420897793	19/02/2020	11/03/2020	U	7/12/2020	292	No	4/04/2020		No	No	No	NP
5.	C200521355637	21/05/2020	11/06/2020	U	31/12/2020	224	No	5/07/2020	U	No	No	No	NP
6.	C200521356767	22/05/2020	12/06/2020	U	26/02/2021	280	No	6/07/2020		No	No	No	NP
7.	C200621429546	3/06/2020	24/06/2020	U	30/11/2020	180	No	18/07/2020		No	No	No	NP
8.	C200621460045	5/06/2020	26/06/2020	U	26/11/2020	174	No	20/07/2020		No	No	No	NP
9.	C200621801446	15/06/2020	6/07/2020	U	24/11/2020	162	No	30/07/2020		No	No	No	NP
10.	C200621883645	27/06/2020	18/07/2020	U	4/09/2020	69	No	11/08/2020		No	No	No	NP
11.	C200722321225	23/07/2020	13/08/2020	U	26/02/2021	218	No	6/09/2020		No	No	No	NP
12.	C200822585336	10/08/2020	31/08/2020	U	25/05/2021	288	No	24/09/2020		No	No	No	NP
13.	C200822680962	13/08/2020	3/09/2020	U	24/09/2020	42	No	27/09/2020	U	Yes	No	No	NP
14.	C200822845520	1/10/2020	22/10/2020	U	4/06/2021	246	No	15/11/2020		No	No	No	NP
15.	C200822866667	28/08/2020	18/09/2020	U	26/02/2021	182	No	12/10/2020		No	No	No	NP
16.	C200923376198	23/09/2020	14/10/2020	U	18/01/2021	117	No	7/11/2020		No	No	No	NP
17.	C200923378656	25/09/2020	16/10/2020	U	21/12/2020	87	No	9/11/2020		No	No	No	NP
18.	C201023409697	2/10/2020	23/10/2020	U	13/01/2021	103	No	16/11/2020		No	No	No	NP
19.	C201023481574	8/10/2020	29/10/2020	U	18/01/2021	102	No	22/11/2020		No	No	No	NP

<sup>1</sup> 'U' values in this Schedule F indicate HBAU has stated that the data is unavailable, so it can be inferred that HBAU did not take the step referred to in that column.

<sup>2</sup> 'NP' values in Column (I) means that HBAU have not produced an Investigation Report (or in some cases, provided a date it completed its Investigation).

'NP' values in Column (m) mean that HBAU have not produced an Investigation Outcome (or in some cases, provided a date of any Investigation Outcome).

<sup>3</sup> Blank values in this Schedule F indicate that HBAU has provided no information, so it can be inferred that HBAU did not take the step referred to in that column.

Row	(a) UCM reference	(b) Date HBAU received UAR	(c) Date HBAU required to either complete Investigation/ or advise Investigation Outcome (21 days)	(d) Date of Extra Time Request (where made)	(e) Date HBAU completed its Investigation	(f) Number of days taken to complete Investigation	(g) Did HBAU make Extra Time Request or complete Investigation within 21 days (Yes/No)	(h) Date HBAU required to complete Investigation (45 days) where applicable	(i) Date HBAU advised Investigation Outcome	(j) Did HBAU complete Investigation within 45 days (Yes/No)	(k) Did HBAU advise Investigation Outcome within 45 days (Yes/No)	(I) Did HBAU refer to Liability Rules in completing its Investigation (Yes/No)	(m) Did HBAU refer to Liability Rules in its Investigation Outcome (Yes/No)
20.	C201023515219	11/10/2020	1/11/2020	U	18/05/2021	219	No	25/11/2020		No	No	No	NP
21.	C201023519739	13/10/2020	3/11/2020	U	16/12/2020	64	No	27/11/2020	U	No	No	No	NP
22.	C201023519739	13/10/2020	3/11/2020	U	16/12/2020	64	No	27/11/2020	U	No	No	No	NP
23.	C201124296478	19/11/2020	10/12/2020	U	30/03/2021	131	No	3/01/2021		No	No	No	NP
24.	C201224485336	2/12/2020	23/12/2020	U	27/07/2021	237	No	16/01/2021		No	No	No	NP
25.	C201224739378	16/12/2020	6/01/2021	U	31/05/2021	166	No	30/01/2021		No	No	No	NP
26.	C201224764063	22/12/2020	12/01/2021	U	23/06/2021	183	No	5/02/2021		No	No	No	NP
27.	C201224796857	22/12/2020	12/01/2021	U	23/06/2021	183	No	5/02/2021		No	No	No	NP
28.	C201224875072	24/12/2020	14/01/2021	U	30/09/2021	280	No	7/02/2021	U	No	No	No*4	NP
29.	C20200210185	10/02/2020	2/03/2020	U	2/10/2020	235	No	26/03/2020		No	No	No	NP
30.	C20200303211	13/02/2020	5/03/2020	U	16/10/2020	246	No	29/03/2020	U	No	No	No	NP
31.	C20200509518	19/05/2020	9/06/2020	U	30/06/2021	407	No	3/07/2020		No	No	No	NP
32.	C20200510097	19/06/2020	10/07/2020	U	29/01/2021	224	No	3/08/2020		No	No	No	NP
33.	C20200610313	27/02/2020	19/03/2020	U	30/06/2021	489	No	12/04/2020		No	No	No	NP
34.	C20200806640	13/08/2020	3/09/2020	U	24/09/2020	42	No	27/09/2020	U	Yes	No	No	NP
35.	C20200909706	15/09/2020	6/10/2020	U	28/11/2020	74	No	30/10/2020	U	No	No	No	NP
36.	C20201008998	12/10/2020	2/11/2020	U	23/06/2021	254	No	26/11/2020		No	No	No	NP
37.	C20201201286	1/12/2020	22/12/2020	U	26/02/2021	87	No	15/01/2021		No	No	No	NP
38.	C20201201306	1/12/2020	22/12/2020	U	17/05/2021	167	No	15/01/2021		No	No	No	NP
39.	C20201201353	29/11/2020	20/12/2020	U	19/02/2021	82	No	13/01/2021		No	No	No	NP
40.	C20201213314	26/12/2020	16/01/2021	U	22/06/2021	178	No	9/02/2021		No	No	No	NP
41.	C20201213417	23/12/2020	13/01/2021	U	2/06/2021	161	No	6/02/2021		No	No	No	NP
42.	C20210100945	3/01/2021	24/01/2021	U	4/06/2021	152	No	17/02/2021		No	No	No	NP

<sup>&</sup>lt;sup>4</sup> 'No\*' values in Column (I) refer to where no Investigation report was produced by HBAU, but it has been inferred that any Investigation reports would not have referred to the Liability Rules, as the Investigation completion date in column (e) was before 3 October 2023.

ompletion date in column (e) was before 3 October 2023. vestigation Outcome was advised to the UAR Customer in

<sup>&#</sup>x27;No\*' values in Column (m) refer to where no Investigation Outcome was produced by HBAU but it has been inferred that any Investigation Outcome would not have referred to the Liability Rules, as the date the Investigation Outcome was advised to the UAR Customer in Column (i) for that row is prior to 20 December 2023.

Row	(a) UCM reference	(b) Date HBAU received UAR	(c) Date HBAU required to either complete Investigation/ or advise Investigation Outcome (21 days)	(d) Date of Extra Time Request (where made)	(e) Date HBAU completed its Investigation	(f) Number of days taken to complete Investigation	(g) Did HBAU make Extra Time Request or complete Investigation within 21 days (Yes/No)	(h) Date HBAU required to complete Investigation (45 days) where applicable	(i) Date HBAU advised Investigation Outcome	(j) Did HBAU complete Investigation within 45 days (Yes/No)	(k) Did HBAU advise Investigation Outcome within 45 days (Yes/No)	(I) Did HBAU refer to Liability Rules in completing its Investigation (Yes/No)	(m) Did HBAU refer to Liability Rules in its Investigation Outcome (Yes/No)
43.	C210124914179	5/01/2021	26/01/2021	U	30/06/2021	176	No	19/02/2021	U	No	No	No	NP
44.	C210124974949	8/01/2021	29/01/2021	U	20/07/2021	193	No	22/02/2021		No	No	No	NP
45.	C210125207405	15/01/2021	5/02/2021	U	31/05/2021	136	No	1/03/2021		No	No	No	NP
46.	C210125359515	25/01/2021	15/02/2021	U	20/05/2021	115	No	11/03/2021		No	No	No	NP
47.	C210125363284	27/01/2021	17/02/2021	U	29/07/2021	183	No	13/03/2021	U	No	No	No	NP
48.	C210225455791	5/02/2021	26/02/2021	U	30/07/2021	175	No	22/03/2021		No	No	No	NP
49.	C210225485403	8/02/2021	1/03/2021	U	5/03/2021	25	No	25/03/2021	U	Yes	No	No	NP
50.	C210225700347	15/02/2021	8/03/2021	U	12/08/2021	178	No	1/04/2021	U	No	No	No	NP
51.	C210225713955	4/02/2021	25/02/2021	U	26/07/2021	172	No	21/03/2021	U	No	No	No	NP
52.	C210225778399	18/02/2021	11/03/2021	U	27/06/2021	129	No	4/04/2021	U	No	No	No	NP
53.	C210225781444	19/02/2021	12/03/2021	U	31/08/2021	193	No	5/04/2021	U	No	No	No	NP
54.	C210225813859	22/02/2021	15/03/2021	U	21/09/2021	211	No	8/04/2021	U	No	No	No	NP
55.	C210225818874	24/02/2021	17/03/2021	U	30/06/2021	126	No	10/04/2021	U	No	No	No*	NP
56.	C210325968829	2/02/2021	23/02/2021	U	3/09/2021	213	No	19/03/2021	U	No	No	No	NP
57.	C210326032781	10/03/2021	31/03/2021	U	18/06/2021	100	No	24/04/2021		No	No	No	NP
58.	C210326034569	11/03/2021	1/04/2021	U	30/06/2021	111	No	25/04/2021		No	No	No	NP
59.	C210326318490	23/03/2021	13/04/2021	U	26/08/2021	156	No	7/05/2021	U	No	No	No	NP
60.	C210326347386	25/03/2021	15/04/2021	U	30/06/2021	97	No	9/05/2021	U	No	No	No	NP
61.	C210326378683	29/03/2021	19/04/2021	U	12/10/2021	197	No	13/05/2021	U	No	No	No	NP
62.	C210426459119	6/04/2021	27/04/2021	U	28/04/2021	22	No	21/05/2021		Yes	No	No	NP
63.	C210426459221	6/04/2021	27/04/2021	U	16/09/2021	163	No	21/05/2021	U	No	No	No	NP
64.	C210426641950	14/04/2021	5/05/2021	U	24/09/2021	163	No	29/05/2021	U	No	No	No	NP
65.	C210426810292	27/04/2021	18/05/2021	U	19/05/2021	22	No	11/06/2021		Yes	No	No	NP
66.	C210526862495	3/05/2021	24/05/2021	U	30/09/2021	150	No	17/06/2021	U	No	No	No	NP
67.	C210527215491	30/05/2021	20/06/2021	U	26/10/2021	149	No	14/07/2021		No	No	No	NP

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68.	C210627494864	16/06/2021	7/07/2021	N/A <sup>5</sup>	30/06/2021	14	Yes	31/07/2021	30/06/2021	Yes	Yes	No	No*
69.	C210627641582	22/06/2021	13/07/2021	U	18/01/2022	210	No	6/08/2021		No	No	No	NP
70.	C210627712701	30/06/2021	21/07/2021	U	30/09/2021	92	No	14/08/2021	U	No	No	No	NP
71.	C210728145659	17/07/2021	7/08/2021	U	12/10/2021	87	No	31/08/2021		No	No	No	NP
72.	C210728195009	20/07/2021	10/08/2021	U	29/10/2021	101	No	3/09/2021	U	No	No	No*	NP
73.	C210928706078	27/08/2021	17/09/2021	U	14/10/2021	48	No	11/10/2021	U	No	No	No	NP
74.	C210928761725	4/09/2021	25/09/2021	U	15/12/2021	102	No	19/10/2021	U	No	No	No	NP
75.	C210928813950	11/09/2021	2/10/2021	U	18/10/2021	37	Yes	26/10/2021	24/09/2021	Yes	Yes	No	No*
76.	C210928967877	15/09/2021	6/10/2021	U	26/11/2021	72	No	30/10/2021	U	No	No	No	NP
77.	C210928968966	15/09/2021	6/10/2021	U	18/02/2022	156	No	30/10/2021	U	No	No	No	NP
78.	C210929001419	17/09/2021	8/10/2021	U	11/02/2022	147	No	1/11/2021	U	No	No	No	NP
79.	C210929110401	28/09/2021	19/10/2021	U	21/12/2021	84	No	12/11/2021	U	No	No	No	NP
80.	C211029116241	1/10/2021	22/10/2021	U	10/11/2021	40	No	15/11/2021	2/11/2021	Yes	Yes	No	No*
81.	C211029166546	6/10/2021	27/10/2021	U	29/10/2021	23	No	20/11/2021	28/10/2021	Yes	Yes	No	No*
82.	C211029369482	10/09/2021	1/10/2021	U	14/02/2022	157	No	25/10/2021	U	No	No	No	NP
83.	C211029380226	21/10/2021	11/11/2021	U	25/02/2022	127	No	5/12/2021	U	No	No	No	NP
84.	C211129789840	20/11/2021	11/12/2021	U	29/04/2022	160	No	4/01/2022		No	No	No	NP
85.	C211129794948	21/11/2021	12/12/2021	U	9/02/2022	80	No	5/01/2022	U	No	No	No	NP
86.	C211129797951	22/11/2021	13/12/2021	U	18/02/2022	88	No	6/01/2022		No	No	No	NP
87.	C211129871518	30/11/2021	21/12/2021	U	31/03/2022	121	No	14/01/2022		No	No	No	NP
88.	C211229895070	3/12/2021	24/12/2021	U	29/03/2022	116	No	17/01/2022		No	No	No	NP
89.	C211229995948	13/12/2021	3/01/2022	U	13/05/2022	151	No	27/01/2022		No	No	No	NP
90.	C211230092422	15/12/2021	5/01/2022	U	28/04/2022	134	No	29/01/2022		No	No	No	NP
91.	C211230162065	21/12/2021	11/01/2022	U	31/05/2022	161	No	4/02/2022		No	No	No	NP

 $\overline{\,^5$  'N/A' values within this Schedule F indicate where the data is not applicable.

Row	(a) UCM reference	(b) Date HBAU received UAR	(c) Date HBAU required to either complete Investigation/ or advise Investigation Outcome (21 days)	(d) Date of Extra Time Request (where made)	(e) Date HBAU completed its Investigation	(f) Number of days taken to complete Investigation	(g) Did HBAU make Extra Time Request or complete Investigation within 21 days (Yes/No)	(h) Date HBAU required to complete Investigation (45 days) where applicable	(i) Date HBAU advised Investigation Outcome	(j) Did HBAU complete Investigation within 45 days (Yes/No)	(k) Did HBAU advise Investigation Outcome within 45 days (Yes/No)	(I) Did HBAU refer to Liability Rules in completing its Investigation (Yes/No)	(m) Did HBAU refer to Liability Rules in its Investigation Outcome (Yes/No)
92.	C211230227998	28/12/2021	18/01/2022	U	31/03/2022	93	No	11/02/2022	U	No	No	No	NP
93.	C211230228316	28/12/2021	18/01/2022	U	30/05/2022	153	No	11/02/2022		No	No	No	NP
94.	C230134676895	24/01/2023	14/02/2023	U	27/03/2023	62	No	10/03/2023	27/03/2024	No	No	No	NP
95.	C230134699667	25/01/2023	15/02/2023	13/04/2023	15/05/2023	110	No	11/03/2023	13/04/2023	No	No	No	No*
96.	C230535709064	13/02/2023	6/03/2023	U	6/06/2023	113	No	30/03/2023	6/06/2023	No	No	No	No*
97.	C230235013968	25/02/2023	18/03/2023	U	24/04/2023	58	No	11/04/2023	24/04/2023	No	No	No	No*
98.	C230335036852	2/03/2023	23/03/2023	U	11/07/2023	131	No	16/04/2023	3/07/2023	No	No	No	No*
99.	C230335038265	2/03/2023	23/03/2023	U	5/05/2023	64	No	16/04/2023	5/05/2023	No	No	No	No
100.	C230335049990	3/03/2023	24/03/2023	U	29/09/2023	210	No	17/04/2023	18/08/2023	No	No	No	No*
101.	C230335074734	4/03/2023	25/03/2023	U	14/07/2023	132	No	18/04/2023	14/07/2023	No	No	No	No*
102.	C230335092680	7/03/2023	28/03/2023	U	18/07/2023	133	No	21/04/2023	14/07/2023	No	No	No	No*
103.	C230335092447	7/03/2023	28/03/2023	N/A	5/04/2023	29	No	21/04/2023	5/04/2023	Yes	Yes	No	No*
104.	C230335096886	8/03/2023	29/03/2023	U	17/07/2023	131	No	22/04/2023	17/07/2023	No	No	No	No*
105.	C230335201467	16/03/2023	6/04/2023	U	6/04/2024	387	No	30/04/2023	6/04/2024	No	No	NP	No
106.	C230335347996	27/03/2023	17/04/2023	25/05/2023	29/06/2023	94	No	11/05/2023	25/05/2023	No	No	No	No*
107.	C230335354809	28/03/2023	18/04/2023	U	20/04/2023	23	Yes	12/05/2023	12/04/2023	Yes	Yes	No	No*
108.	C230335355766	28/03/2023	18/04/2023	U	21/04/2023	24	No	12/05/2023	21/04/2023	Yes	Yes	No	No*
109.	C230335374124	31/03/2023	21/04/2023	13/06/2023	13/06/2023	74	No	15/05/2023	13/06/2023	No	No	No	No*
110.	C230435421080	8/04/2023	29/04/2023	U	U	U	No	23/05/2023	24/05/2024	No	No	NP	No
111.	C230435460835	12/04/2023	3/05/2023	19/06/2023	1/07/2023	80	No	27/05/2023	19/06/2023	No	No	No	No*
112.	C230435654262	19/04/2023	10/05/2023	U	18/07/2023	90	No	3/06/2023	17/07/2023	No	No	No	No
113.	C230535713333	3/05/2023	24/05/2023	U	28/07/2023	86	No	17/06/2023	27/07/2023	No	No	No	No*
114.	C230535729507	4/05/2023	25/05/2023	U	15/01/2024	256	No	18/06/2023	15/08/2023	No	No	No	No*
115.	C230535749955	5/05/2023	26/05/2023	N/A	24/07/2023	80	No	19/06/2023	24/07/2023	No	No	No	No*
116.	C230535804284	10/05/2023	31/05/2023	N/A	4/12/2023	208	No	24/06/2023	1/12/2023	No	No	No	No

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117.	C230535842457	12/05/2023	2/06/2023	U	17/06/2024	402	No	26/06/2023	22/07/2024	No	No	Yes	Yes
118.	C230535894177	16/05/2023	6/06/2023	U	3/08/2023	79	No	30/06/2023	3/08/2023	No	No	No	No
119.	C230535915874	18/05/2023	8/06/2023	23/06/2023	27/07/2023	70	No	2/07/2023	27/07/2023	No	No	No	No*
120.	C230535933729	19/05/2023	9/06/2023	U	21/08/2023	94	No	3/07/2023	21/08/2023	No	No	No	No
121.	C230535993805	25/05/2023	15/06/2023	U	21/08/2023	88	No	9/07/2023	21/08/2023	No	No	No	No
122.	C230937222870	21/09/2023	12/10/2023	19/10/2023	5/04/2024	197	No	5/11/2023	N/A	No	N/A	Yes	Yes
123.	C230535992643	25/05/2023	15/06/2023	13/05/2024	21/03/2024	301	No	9/07/2023	13/05/2024	No	No	Yes	Yes
124.	C230536032886	30/05/2023	20/06/2023	13/07/2023	10/08/2023	72	No	14/07/2023	9/08/2023	No	No	No	No*
125.	C230536032424	30/05/2023	20/06/2023	U	11/09/2023	104	No	14/07/2023	22/08/2023	No	No	No	No
126.	C230536034232	30/05/2023	20/06/2023	30/06/2023	U	U	No	14/07/2023	8/07/2023	No	Yes	NP	No*
127.	C230536035017	31/05/2023	21/06/2023	2/06/2023	21/09/2023	113	Yes	15/07/2023	21/09/2023	No	No	No	No*
128.	C230536034918	31/05/2023	21/06/2023	16/08/2023	1/09/2023	93	No	15/07/2023	1/09/2023	No	No	No	No
129.	C230536035940	31/05/2023	21/06/2023	U	24/06/2024	390	No	15/07/2023	22/07/2024	No	No	No	Yes
130.	C230636043054	1/06/2023	22/06/2023	U	9/08/2023	69	No	16/07/2023	8/08/2023	No	No	No	No
131.	C230636046171	2/06/2023	23/06/2023	6/12/2023	6/12/2023	187	No	17/07/2023	6/12/2023	No	No	No	No*
132.	C230636074476	5/06/2023	26/06/2023	18/08/2023	29/04/2024	329	No	20/07/2023	3/07/2024	No	No	Yes	Yes
133.	C230636074866	5/06/2023	26/06/2023	25/09/2023	18/10/2023	135	No	20/07/2023	25/09/2023	No	No	No	No
134.	C230636086743	6/06/2023	27/06/2023	N/A	13/06/2024	373	No	21/07/2023	17/06/2024	No	No	NP	NP
135.	C230636108862	7/06/2023	28/06/2023	23/08/2023	20/09/2023	105	No	22/07/2023	20/09/2023	No	No	No	No*
136.	C230636110127	7/06/2023	28/06/2023	U	22/09/2023	107	No	22/07/2023	22/09/2023	No	No	No	No
137.	C230636135902	9/06/2023	30/06/2023	U	11/09/2023	94	No	24/07/2023	11/09/2023	No	No	No	No*
138.	C230636137577	11/06/2023	2/07/2023	15/06/2023	1/08/2023	51	Yes	26/07/2023	1/08/2023	No	No	No	No*
139.	C230636157557	13/06/2023	4/07/2023	U	6/07/2023	23	No	28/07/2023	5/07/2023	Yes	Yes	No	No*
140.	C230636169397	13/06/2023	4/07/2023	U	24/07/2023	41	No	28/07/2023	18/07/2023	Yes	Yes	No	No*
141.	C230636189587	14/06/2023	5/07/2023	11/08/2023	18/08/2023	65	No	29/07/2023	18/08/2023	No	No	No	No

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142.	C230636209577	16/06/2023	7/07/2023	12/03/2024	12/03/2024	270	No	31/07/2023	12/03/2024	No	No	Yes	Yes
143.	C230636210273	17/06/2023	8/07/2023	12/03/2024	11/03/2024	268	No	1/08/2023	12/03/2024	No	No	Yes	Yes
144.	C230636221199	19/06/2023	10/07/2023	U	26/04/2024	312	No	3/08/2023	24/07/2024	No	No	Yes	NP
145.	C240138372547	20/06/2023	11/07/2023	3/05/2024	19/04/2024	304	No	4/08/2023	3/05/2024	No	No	Yes	Yes
146.	C230636271010	23/06/2023	14/07/2023	U	24/08/2023	62	No	7/08/2023	24/08/2023	No	No	No	No
147.	C230636270959	23/06/2023	14/07/2023	25/04/2024	25/04/2024	307	No	7/08/2023	25/04/2024	No	No	NP	No
148.	C230636270922	23/06/2023	14/07/2023	U	6/06/2024	349	No	7/08/2023	22/07/2024	No	No	Yes	Yes
149.	C230636275400	24/06/2023	15/07/2023	14/11/2023	14/11/2023	143	No	8/08/2023	14/11/2023	No	No	No	No
150.	C230636299830	26/06/2023	17/07/2023	U	19/09/2023	85	No	10/08/2023	18/09/2023	No	No	No	No
151.	C230636299588	26/06/2023	17/07/2023	U	12/04/2024	291	No	10/08/2023	30/04/2024	No	No	NP	NP
152.	C230636300060	26/06/2023	17/07/2023	U	6/06/2024	346	No	10/08/2023	22/07/2024	No	No	Yes	Yes
153.	C230636319007	27/06/2023	18/07/2023	U	3/10/2023	98	No	11/08/2023	3/10/2023	No	No	Yes	No
154.	C230636323407	28/06/2023	19/07/2023	24/05/2024	24/05/2024	331	No	12/08/2023	24/05/2024	No	No	NP	No
155.	C230736339433	29/06/2023	20/07/2023	U	14/09/2023	77	No	13/08/2023	23/08/2023	No	No	No	No*
156.	C230636327556	29/06/2023	20/07/2023	14/11/2023	14/11/2023	138	No	13/08/2023	14/11/2023	No	No	No	No
157.	C230736339191	2/07/2023	23/07/2023	16/11/2023	29/02/2024	242	No	16/08/2023	16/11/2023	No	No	No	No
158.	C230736342098	3/07/2023	24/07/2023	18/09/2023	18/09/2023	77	No	17/08/2023	18/09/2023	No	No	No	No
159.	C230736340668	3/07/2023	24/07/2023	U	26/04/2024	298	No	17/08/2023	25/07/2024	No	No	Yes	Yes
160.	C230736340364	3/07/2023	24/07/2023	U	14/05/2024	316	No	17/08/2023	25/07/2024	No	No	Yes	Yes
161.	C230736355339	5/07/2023	26/07/2023	U	18/05/2024	318	No	19/08/2023	24/07/2024	No	No	Yes	Yes
162.	C230736368153	6/07/2023	27/07/2023	U	19/05/2024	318	No	20/08/2023	26/07/2024	No	No	Yes	Yes
163.	C230937272335	27/09/2023	18/10/2023	30/10/2023	U	U	No	11/11/2023	U	No	No	NP	No
164.	C240138262826	7/07/2023	28/07/2023	13/03/2024	12/03/2024	249	No	21/08/2023	13/03/2024	No	No	Yes	Yes
165.	C230736377819	8/07/2023	29/07/2023	U	7/06/2024	335	No	22/08/2023	15/07/2024	No	No	Yes	Yes
166.	C231037543868	19/10/2023	9/11/2023	17/11/2023	2/11/2023	14	No	3/12/2023	U	Yes	No	NP	NP

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167.	C220531899979	13/05/2022	3/06/2022	6/07/2022	20/07/2022	68	No	27/06/2022	6/07/2022	No	No	No	No*
168.	C230736410958	9/07/2023	30/07/2023	U	18/07/2024	375	No	23/08/2023	26/08/2024	No	No	No	NP
169.	C230937226842	11/07/2023	1/08/2023	28/03/2024	22/03/2024	255	No	25/08/2023	28/03/2024	No	No	Yes	Yes
170.	C230736423251	11/07/2023	1/08/2023	U	24/10/2023	105	No	25/08/2023	25/09/2023	No	No	No	No*
171.	C230736433987	11/07/2023	1/08/2023	26/04/2024	19/03/2024	252	No	25/08/2023	26/04/2024	No	No	No	Yes
172.	C230736435291	12/07/2023	2/08/2023	7/05/2024	7/05/2024	300	No	26/08/2023	7/05/2024	No	No	No	Yes
173.	C230736435508	12/07/2023	2/08/2023	U	6/05/2024	299	No	26/08/2023	16/07/2024	No	No	Yes	Yes
174.	C230736490949	15/07/2023	5/08/2023	U	20/05/2024	310	No	29/08/2023	17/07/2024	No	No	Yes	Yes
175.	C230736602488	15/07/2023	5/08/2023	U	17/05/2024	307	No	29/08/2023	13/06/2024	No	No	Yes	Yes
176.	C230736598960	25/07/2023	15/08/2023	U	12/09/2023	49	No	8/09/2023	11/09/2023	No	No	No	No*
177.	C230836688180	25/07/2023	15/08/2023	U	9/07/2024	350	No	8/09/2023	29/07/2024	No	No	Yes	No
178.	C230736599149	25/07/2023	15/08/2023	U	21/06/2024	332	No	8/09/2023	23/07/2024	No	No	Yes	Yes
179.	C230736602157	26/07/2023	16/08/2023	N/A	24/05/2024	303	Yes	9/09/2023	4/08/2023	No	Yes	NP	No*
180.	C230736611088	26/07/2023	16/08/2023	16/04/2024	22/04/2024	271	No	9/09/2023	22/04/2024	No	No	NP	No
181.	C230736601574	26/07/2023	16/08/2023	22/03/2024	27/02/2024	216	No	9/09/2023	22/03/2024	No	No	Yes	Yes
182.	C230736601223	26/07/2023	16/08/2023	22/07/2024	20/06/2024	330	No	9/09/2023	22/07/2024	No	No	Yes	Yes
183.	C230736605362	27/07/2023	17/08/2023	N/A	6/12/2023	132	No	10/09/2023	13/12/2023	No	No	No	No*
184.	C230736605654	27/07/2023	17/08/2023	N/A	15/03/2024	232	No	10/09/2023	22/04/2024	No	No	No	Yes
185.	C230736609838	28/07/2023	18/08/2023	U	20/05/2024	297	No	11/09/2023	20/05/2024	No	No	Yes	Yes
186.	C230736611186	29/07/2023	19/08/2023	26/09/2023	1/03/2024	216	No	12/09/2023	29/03/2024	No	No	Yes	NP
187.	C230736611193	29/07/2023	19/08/2023	22/05/2024	3/06/2024	310	No	12/09/2023	22/05/2024	No	No	Yes	NP
188.	C230736613765	31/07/2023	21/08/2023	9/05/2024	26/02/2024	210	No	14/09/2023	7/06/2024	No	No	Yes	NP
189.	C230836616885	1/08/2023	22/08/2023	N/A	26/02/2024	209	No	15/09/2023	10/07/2024	No	No	Yes	NP
190.	C240339039350	7/09/2022	28/09/2022	14/10/2022	14/10/2022	37	No	22/10/2022	14/10/2022	Yes	Yes	No	No*
191.	C230836621456	2/08/2023	23/08/2023	6/04/2024	6/04/2024	248	No	16/09/2023	6/04/2024	No	No	No	No

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192.	C240238808411	19/12/2022	9/01/2023	8/02/2023	8/02/2023	51	No	2/02/2023	8/02/2023	No	No	No	No*
193.	C230836621041	2/08/2023	23/08/2023	24/07/2024	30/04/2024	272	No	16/09/2023	24/07/2024	No	No	No	Yes
194.	C240138437919	27/01/2023	17/02/2023	28/03/2023	31/03/2023	63	No	13/03/2023	N/A	No	N/A	No	NP
195.	C230836932560	3/08/2023	24/08/2023	13/03/2024	23/02/2024	204	No	17/09/2023	13/03/2024	No	No	Yes	Yes
196.	C230836633301	3/08/2023	24/08/2023	U	7/03/2024	217	No	17/09/2023	2/02/2024	No	No	Yes	Yes
197.	C230836675939	5/08/2023	26/08/2023	N/A	1/05/2024	270	No	19/09/2023	6/09/2023	No	Yes	Yes	No*
198.	C230836653320	5/08/2023	26/08/2023	U	18/06/2024	318	No	19/09/2023	23/07/2024	No	No	Yes	Yes
199.	C230836653349	5/08/2023	26/08/2023	24/07/2024	8/05/2024	277	No	19/09/2023	24/07/2024	No	No	Yes	Yes
200.	C230836653417	5/08/2023	26/08/2023	22/07/2024	17/06/2024	317	No	19/09/2023	22/07/2024	No	No	Yes	Yes
201.	C230836676820	7/08/2023	28/08/2023	22/07/2024	8/06/2024	306	No	21/09/2023	22/07/2024	No	No	Yes	Yes
202.	C230836686618	8/08/2023	29/08/2023	9/11/2023	5/03/2024	210	No	22/09/2023	9/11/2023	No	No	Yes	No
203.	C230836701394	9/08/2023	30/08/2023	N/A	27/05/2024	292	No	23/09/2023	22/07/2024	No	No	Yes	Yes
204.	C230836705035	10/08/2023	31/08/2023	13/06/2024	28/05/2024	292	No	24/09/2023	13/06/2024	No	No	Yes	Yes
205.	C230836752650	13/08/2023	3/09/2023	23/07/2024	6/06/2024	298	No	27/09/2023	23/07/2024	No	No	Yes	Yes
206.	C230937222247	14/08/2023	4/09/2023	5/10/2023	21/02/2024	191	No	28/09/2023	5/10/2023	No	No	Yes	No*
207.	C230836761778	14/08/2023	4/09/2023	15/07/2024	15/06/2024	306	No	28/09/2023	15/07/2024	No	No	Yes	Yes
208.	C230836761130	14/08/2023	4/09/2023	22/07/2024	10/06/2024	301	No	28/09/2023	22/07/2024	No	No	No	Yes
209.	C230836859663	15/08/2023	5/09/2023	U	U	U	No	29/09/2023	3/11/2023	No	No	NP	No*
210.	C230836787495	15/08/2023	5/09/2023	U	20/06/2024	310	No	29/09/2023	23/07/2024	No	No	Yes	Yes
211.	C230836848540	17/08/2023	7/09/2023	26/03/2024	14/03/2024	210	No	1/10/2023	26/03/2024	No	No	Yes	Yes
212.	C230836888958	20/08/2023	10/09/2023	U	8/04/2024	232	No	4/10/2023	19/12/2023	No	No	No	NP
213.	C230836892861	22/08/2023	12/09/2023	N/A	28/02/2024	190	No	6/10/2023	31/07/2024	No	No	No	Yes
214.	C230836896372	23/08/2023	13/09/2023	15/03/2024	11/04/2024	232	No	7/10/2023	15/03/2024	No	No	Yes	No
215.	C230836900468	24/08/2023	14/09/2023	20/09/2023	9/04/2024	229	No	8/10/2023	31/07/2024	No	No	Yes	Yes
216.	C230836907428	25/08/2023	15/09/2023	19/03/2024	14/04/2024	233	No	9/10/2023	30/05/2024	No	No	Yes	Yes

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217.	C230937073222	26/08/2023	16/09/2023	19/09/2023	7/03/2024	194	No	10/10/2023	12/04/2024	No	No	Yes	Yes
218.	C230836909951	26/08/2023	16/09/2023	U	8/01/2024	135	No	10/10/2023	17/10/2023	No	No	No	No*
219.	C230836909913	26/08/2023	16/09/2023	U	2/06/2024	281	No	10/10/2023	22/07/2024	No	No	Yes	Yes
220.	C230836910013	26/08/2023	16/09/2023	U	3/07/2024	312	No	10/10/2023	27/07/2024	No	No	No	Yes
221.	C240238717772	29/08/2023	19/09/2023	19/09/2023	6/04/2024	221	Yes	13/10/2023	6/04/2024	No	No	NP	No
222.	C230836938561	31/08/2023	21/09/2023	20/10/2023	26/06/2024	300	No	15/10/2023	16/07/2024	No	No	Yes	Yes
223.	C230936989593	5/09/2023	26/09/2023	28/09/2023	30/04/2024	238	No	20/10/2023	30/04/2024	No	No	NP	No
224.	C230936989712	5/09/2023	26/09/2023	3/10/2023	14/03/2024	191	No	20/10/2023	22/03/2024	No	No	No	Yes
225.	C230936988521	5/09/2023	26/09/2023	3/10/2023	1/05/2024	239	No	20/10/2023	8/07/2024	No	No	Yes	Yes
226.	C231037344666	5/09/2023	26/09/2023	3/10/2023	6/04/2024	214	No	20/10/2023	6/04/2024	No	No	Yes	No
227.	C230936989960	5/09/2023	26/09/2023	N/A	19/06/2024	288	No	20/10/2023	22/07/2024	No	No	Yes	Yes
228.	C240138437533	7/09/2023	28/09/2023	3/10/2023	10/05/2024	246	No	22/10/2023	10/05/2024	No	No	NP	No
229.	C230937007570	7/09/2023	28/09/2023	U	21/03/2024	196	No	22/10/2023	27/10/2023	No	No	Yes	No*
230.	C230937044659	10/09/2023	1/10/2023	3/10/2023	23/04/2024	226	No	25/10/2023	22/05/2024	No	No	Yes	Yes
231.	C230937044704	10/09/2023	1/10/2023	3/10/2023	25/07/2024	319	No	25/10/2023	25/07/2024	No	No	Yes	Yes
232.	C230937050270	11/09/2023	2/10/2023	4/10/2023	30/05/2024	262	No	26/10/2023	30/10/2023	No	No	NP	No*
233.	C230937046323	11/09/2023	2/10/2023	28/03/2024	2/04/2024	204	No	26/10/2023	26/04/2024	No	No	Yes	Yes
234.	C240138266991	12/09/2023	3/10/2023	9/10/2023	16/02/2024	157	No	27/10/2023	16/04/2024	No	No	Yes	Yes
235.	C230937098858	12/09/2023	3/10/2023	9/10/2023	8/07/2024	300	No	27/10/2023	8/07/2024	No	No	NP	NP
236.	C231037652414	13/09/2023	4/10/2023	11/10/2023	14/03/2024	183	No	28/10/2023	1/05/2024	No	No	Yes	Yes
237.	C240138417736	13/09/2023	4/10/2023	9/10/2023	14/05/2024	244	No	28/10/2023	19/07/2024	No	No	Yes	Yes
238.	C230937121979	15/09/2023	6/10/2023	16/10/2023	16/05/2024	244	No	30/10/2023	9/11/2023	No	No	NP	No*
239.	C231137963063	15/09/2023	6/10/2023	17/10/2023	28/03/2024	195	No	30/10/2023	4/04/2024	No	No	Yes	NP
240.	C240138357100	16/09/2023	7/10/2023	10/10/2023	1/04/2024	198	No	31/10/2023	12/06/2024	No	No	Yes	Yes
241.	C230937258047	18/09/2023	9/10/2023	25/10/2023	13/06/2024	269	No	2/11/2023	24/07/2024	No	No	Yes	Yes

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242.	C230937176877	18/09/2023	9/10/2023	10/10/2023	14/06/2024	270	No	2/11/2023	22/07/2024	No	No	Yes	Yes
243.	C230937284098	19/09/2023	10/10/2023	18/10/2023	13/05/2024	237	No	3/11/2023	28/05/2024	No	No	Yes	Yes
244.	C230937188161	19/09/2023	10/10/2023	11/10/2023	10/06/2024	265	No	3/11/2023	22/07/2024	No	No	Yes	Yes
245.	C230937187944	19/09/2023	10/10/2023	18/10/2023	11/03/2024	174	No	3/11/2023	22/07/2024	No	No	Yes	Yes
246.	C230937188024	19/09/2023	10/10/2023	11/12/2023	26/03/2024	189	No	3/11/2023	14/08/2024	No	No	Yes	Yes
247.	C230937187877	19/09/2023	10/10/2023	16/10/2023	1/05/2024	225	No	3/11/2023	22/07/2024	No	No	Yes	Yes
248.	C240138562152	20/09/2023	11/10/2023	19/10/2023	7/03/2024	169	No	4/11/2023	19/03/2024	No	No	Yes	NP
249.	C230937208063	20/09/2023	11/10/2023	19/10/2023	8/06/2024	262	No	4/11/2023	22/07/2024	No	No	Yes	Yes
250.	C230937219239	21/09/2023	12/10/2023	18/10/2023	1/05/2024	223	No	5/11/2023	12/06/2024	No	No	Yes	Yes
251.	C230937219478	21/09/2023	12/10/2023	17/10/2023	1/04/2024	193	No	5/11/2023	14/05/2024	No	No	Yes	Yes
252.	C231037336743	21/09/2023	12/10/2023	18/10/2023	6/03/2024	167	No	5/11/2023	6/03/2024	No	No	Yes	Yes
253.	C240238716475	21/09/2023	12/10/2023	18/10/2023	22/03/2024	183	No	5/11/2023	28/08/2024	No	No	Yes	No
254.	C240238744582	21/09/2023	12/10/2023	19/10/2023	10/05/2024	232	No	5/11/2023	23/07/2024	No	No	Yes	Yes
255.	C230937222183	21/09/2023	12/10/2023	16/10/2023	25/06/2024	278	No	5/11/2023	16/07/2024	No	No	Yes	Yes
256.	C230937222561	21/09/2023	12/10/2023	18/10/2023	27/05/2024	249	No	5/11/2023	22/07/2024	No	No	Yes	Yes
257.	C230937222073	21/09/2023	12/10/2023	18/10/2023	30/05/2024	252	No	5/11/2023	30/05/2024	No	No	NP	No
258.	C230937219520	21/09/2023	12/10/2023	10/11/2023	2/05/2024	224	No	5/11/2023	12/06/2024	No	No	Yes	Yes
259.	C230937227248	22/09/2023	13/10/2023	24/10/2023	28/02/2024	159	No	6/11/2023	7/03/2024	No	No	Yes	NP
260.	C230937226729	22/09/2023	13/10/2023	19/10/2023	21/02/2024	152	No	6/11/2023	20/03/2024	No	No	Yes	Yes
261.	C231137770952	22/09/2023	13/10/2023	19/10/2023	10/05/2024	231	No	6/11/2023	24/05/2024	No	No	Yes	Yes
262.	C231137981656	22/09/2023	13/10/2023	10/11/2023	10/05/2024	231	No	6/11/2023	11/07/2024	No	No	Yes	NP
263.	C231037444046	22/09/2023	13/10/2023	18/10/2023	2/05/2024	223	No	6/11/2023	2/05/2024	No	No	NP	No
264.	C230937227080	22/09/2023	13/10/2023	18/10/2023	22/05/2024	243	No	6/11/2023	25/06/2024	No	No	Yes	Yes
265.	C231037543852	22/09/2023	13/10/2023	17/11/2023	24/05/2024	245	No	6/11/2023	24/05/2024	No	No	Yes	Yes
266.	C240238574865	23/09/2023	14/10/2023	24/10/2023	21/02/2024	151	No	7/11/2023	20/11/2023	No	No	Yes	No*

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267.	C240238566577	23/09/2023	14/10/2023	24/10/2023	21/06/2024	272	No	7/11/2023	15/07/2024	No	No	Yes	Yes
268.	C230937237238	23/09/2023	14/10/2023	24/10/2023	2/05/2024	222	No	7/11/2023	22/07/2024	No	No	Yes	Yes
269.	C230937237074	23/09/2023	14/10/2023	24/10/2023	13/06/2024	264	No	7/11/2023	5/07/2024	No	No	Yes	Yes
270.	C230937237064	23/09/2023	14/10/2023	20/10/2023	27/02/2024	157	No	7/11/2023	5/03/2024	No	No	Yes	NP
271.	C230937257483	24/09/2023	15/10/2023	24/10/2023	19/06/2024	269	No	8/11/2023	30/07/2024	No	No	Yes	Yes
272.	C230937257961	25/09/2023	16/10/2023	25/10/2023	17/05/2024	235	No	9/11/2023	26/07/2024	No	No	Yes	Yes
273.	C230937270033	25/09/2023	16/10/2023	26/10/2023	28/06/2024	277	No	9/11/2023	19/07/2024	No	No	Yes	No
274.	C230937270211	26/09/2023	17/10/2023	30/10/2023	1/08/2024	310	No	10/11/2023	1/08/2024	No	No	No	NP
275.	C230937285866	27/09/2023	18/10/2023	30/10/2023	U	U	No	11/11/2023	12/04/2024	No	No	NP	NP
276.	C230937288558	27/09/2023	18/10/2023	30/10/2023	11/04/2024	197	No	11/11/2023	15/07/2024	No	No	Yes	Yes
277.	C231037674496	27/09/2023	18/10/2023	27/10/2023	23/02/2024	149	No	11/11/2023	20/11/2023	No	No	Yes	No*
278.	C240238574775	27/09/2023	18/10/2023	30/10/2023	17/05/2024	233	No	11/11/2023	21/05/2024	No	No	Yes	Yes
279.	C230836910018	27/09/2023	18/10/2023	27/10/2023	14/05/2024	230	No	11/11/2023	14/05/2024	No	No	NP	No
280.	C240138387014	27/09/2023	18/10/2023	30/10/2023	6/05/2024	222	No	11/11/2023	13/06/2024	No	No	Yes	Yes
281.	C230937289201	27/09/2023	18/10/2023	31/10/2023	3/05/2024	219	No	11/11/2023	3/07/2024	No	No	Yes	Yes
282.	C230937285894	27/09/2023	18/10/2023	27/10/2023	1/06/2024	248	No	11/11/2023	13/06/2024	No	No	Yes	Yes
283.	C230937288689	27/09/2023	18/10/2023	30/10/2023	12/05/2024	228	No	11/11/2023	26/07/2024	No	No	Yes	Yes
284.	C230937287206	27/09/2023	18/10/2023	30/10/2023	9/05/2024	225	No	11/11/2023	19/07/2024	No	No	Yes	Yes
285.	C231037405851	28/09/2023	19/10/2023	31/10/2023	26/04/2024	211	No	12/11/2023	13/05/2024	No	No	Yes	Yes
286.	C230937303207	29/09/2023	20/10/2023	1/11/2023	7/06/2024	252	No	13/11/2023	7/06/2024	No	No	Yes	No
287.	C240238571992	29/09/2023	20/10/2023	31/10/2023	26/03/2024	179	No	13/11/2023	28/03/2024	No	No	Yes	Yes
288.	C230937303441	29/09/2023	20/10/2023	1/11/2023	28/06/2024	273	No	13/11/2023	23/07/2024	No	No	Yes	Yes
289.	C240339080624	30/09/2023	21/10/2023	1/11/2023	2/06/2024	246	No	14/11/2023	12/06/2024	No	No	Yes	Yes
290.	C230937310181	30/09/2023	21/10/2023	1/11/2023	15/05/2024	228	No	14/11/2023	24/07/2024	No	No	Yes	Yes
291.	C230937214585	1/10/2023	22/10/2023	1/11/2023	22/05/2024	234	No	15/11/2023	22/05/2024	No	No	NP	No

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292.	C231137941860	1/10/2023	22/10/2023	1/11/2023	12/04/2024	194	No	15/11/2023	12/04/2024	No	No	NP	No
293.	C231037336721	1/10/2023	22/10/2023	1/11/2023	6/05/2024	218	No	15/11/2023	22/07/2024	No	No	Yes	Yes
294.	C231037337219	2/10/2023	23/10/2023	6/11/2023	26/02/2024	147	No	16/11/2023	4/03/2024	No	No	Yes	Yes
295.	C231037338031	2/10/2023	23/10/2023	6/11/2023	1/03/2024	151	No	16/11/2023	13/03/2024	No	No	Yes	Yes
296.	C240238803118	2/10/2023	23/10/2023	13/03/2024	4/03/2024	154	No	16/11/2023	13/03/2024	No	No	Yes	Yes
297.	C231037336739	4/10/2023	25/10/2023	8/11/2023	22/02/2024	141	No	18/11/2023	21/11/2023	No	No	Yes	No*
298.	C231037344822	4/10/2023	25/10/2023	8/11/2023	11/04/2024	190	No	18/11/2023	3/05/2024	No	No	Yes	NP
299.	C231037344585	4/10/2023	25/10/2023	20/11/2023	20/06/2024	260	No	18/11/2023	17/07/2024	No	No	NP	NP
300.	C231037357165	5/10/2023	26/10/2023	8/11/2023	2/06/2024	241	No	19/11/2023	12/06/2024	No	No	Yes	Yes
301.	C231037357124	5/10/2023	26/10/2023	8/11/2023	1/05/2024	209	No	19/11/2023	16/07/2024	No	No	Yes	Yes
302.	C231037462379	5/10/2023	26/10/2023	U	22/01/2024	109	No	19/11/2023	18/01/2024	No	No	No	NP
303.	C231037347901	5/10/2023	26/10/2023	24/07/2024	U	U	No	19/11/2023	24/07/2024	No	No	Yes	Yes
304.	C231037366300	6/10/2023	27/10/2023	13/11/2023	1/05/2024	208	No	20/11/2023	1/05/2024	No	No	Yes	No
305.	C240238566576	6/10/2023	27/10/2023	13/11/2023	30/04/2024	207	No	20/11/2023	8/05/2024	No	No	Yes	Yes
306.	C231037613401	6/10/2023	27/10/2023	13/11/2023	6/03/2024	152	No	20/11/2023	12/03/2024	No	No	Yes	Yes
307.	C231037703693	6/10/2023	27/10/2023	10/11/2023	22/05/2024	229	No	20/11/2023	22/05/2024	No	No	NP	No
308.	C231037374984	6/10/2023	27/10/2023	15/11/2023	7/05/2024	214	No	20/11/2023	24/07/2024	No	No	Yes	Yes
309.	C231037366622	6/10/2023	27/10/2023	10/11/2023	17/05/2024	224	No	20/11/2023	13/06/2024	No	No	Yes	Yes
310.	C231037366427	6/10/2023	27/10/2023	13/11/2023	24/05/2024	231	No	20/11/2023	13/06/2024	No	No	Yes	Yes
311.	C231037365333	6/10/2023	27/10/2023	13/11/2023	8/05/2024	215	No	20/11/2023	29/05/2024	No	No	Yes	Yes
312.	C231037364974	6/10/2023	27/10/2023	13/11/2023	4/06/2024	242	No	20/11/2023	22/07/2024	No	No	Yes	NP
313.	C240339031178	7/10/2023	28/10/2023	9/11/2023	26/02/2024	142	No	21/11/2023	21/11/2023	No	Yes	Yes	No*
314.	C240138442607	7/10/2023	28/10/2023	13/11/2023	11/05/2024	217	No	21/11/2023	28/05/2024	No	No	Yes	Yes
315.	C231037375008	7/10/2023	28/10/2023	13/11/2023	19/04/2024	195	No	21/11/2023	16/07/2024	No	No	Yes	Yes
316.	C231037367477	7/10/2023	28/10/2023	13/11/2023	16/05/2024	222	No	21/11/2023	30/07/2024	No	No	Yes	Yes

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317.	C231037375018	7/10/2023	28/10/2023	21/11/2023	12/03/2024	157	No	21/11/2023	30/07/2024	No
318.	C231238087876	8/10/2023	29/10/2023	29/01/2024	16/04/2024	191	No	22/11/2023	9/05/2024	No
319.	C231037405141	8/10/2023	29/10/2023	8/11/2023	6/03/2024	150	No	22/11/2023	6/03/2024	No
320.	C240138494872	9/10/2023	30/10/2023	18/11/2023	3/04/2024	177	No	23/11/2023	11/04/2024	No
321.	C231037405625	9/10/2023	30/10/2023	10/11/2023	7/06/2024	242	No	23/11/2023	26/07/2024	No
322.	C231238132710	10/10/2023	31/10/2023	1/11/2023	6/05/2024	209	No	24/11/2023	6/05/2024	No
323.	C231037418877	10/10/2023	31/10/2023	18/11/2023	27/06/2024	261	No	24/11/2023	30/07/2024	No
324.	C231037417709	11/10/2023	1/11/2023	18/11/2023	7/05/2024	209	No	25/11/2023	22/07/2024	No
325.	C231037652240	13/10/2023	3/11/2023	13/11/2023	1/05/2024	201	No	27/11/2023	22/07/2024	No
326.	C231037465332	13/10/2023	3/11/2023	13/11/2023	2/06/2024	233	No	27/11/2023	12/07/2024	No
327.	C240238717538	14/10/2023	4/11/2023	14/11/2023	9/05/2024	208	No	28/11/2023	17/07/2024	No
328.	C231037554363	14/10/2023	4/11/2023	30/11/2023	23/05/2024	222	No	28/11/2023	17/07/2024	No
329.	C231037541972	15/10/2023	5/11/2023	15/11/2023	4/05/2024	202	No	29/11/2023	9/05/2024	No
330.	C231037541954	15/10/2023	5/11/2023	15/11/2023	1/03/2024	138	No	29/11/2023	12/03/2024	No
331.	C231137713634	16/10/2023	6/11/2023	13/11/2023	7/03/2024	143	No	30/11/2023	8/03/2024	No
332.	C231137975065	16/10/2023	6/11/2023	15/11/2023	11/04/2024	178	No	30/11/2023	9/05/2024	No
333.	C230936989963	16/10/2023	6/11/2023	14/11/2023	30/04/2024	197	No	30/11/2023	17/05/2024	No
334.	C231037613060	17/10/2023	7/11/2023	4/12/2023	4/03/2024	139	No	1/12/2023	21/03/2024	No
335.	C221234294847	18/10/2023	8/11/2023	5/02/2024	12/07/2024	268	No	2/12/2023	15/02/2024	No
336.	C240238614884	18/10/2023	8/11/2023	17/11/2023	4/04/2024	169	No	2/12/2023	30/07/2024	No
337.	C231037589750	18/10/2023	8/11/2023	17/11/2023	24/04/2024	189	No	2/12/2023	30/07/2024	No
338.	C231037589752	18/10/2023	8/11/2023	17/11/2023	15/04/2024	180	No	2/12/2023	22/07/2024	No
339.	C231037654575	19/10/2023	9/11/2023	29/11/2023	30/04/2024	194	No	3/12/2023	22/07/2024	No
340.	C231037598650	19/10/2023	9/11/2023	27/11/2023	10/05/2024	204	No	3/12/2023	26/07/2024	No
341.	C231037613291	20/10/2023	10/11/2023	18/11/2023	8/03/2024	140	No	4/12/2023	8/03/2024	No

on ys	(k) Did HBAU advise Investigation Outcome within 45 days (Yes/No)	(I) Did HBAU refer to Liability Rules in completing its Investigation (Yes/No)	(m) Did HBAU refer to Liability Rules in its Investigation Outcome (Yes/No)
	No	Yes	Yes
	No	Yes	No
	No	Yes	Yes
	No	Yes	Yes
	No	Yes	Yes
	No	NP	No
	No	Yes	Yes
	No	Yes	NP
	No	Yes	Yes
	No	Yes	NP
	No	No	NP
	No	Yes	Yes
	No	Yes	No
	No	Yes	Yes

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342.	C231037613256	20/10/2023	10/11/2023	27/11/2023	16/04/2024	179	No	4/12/2023	16/04/2024	No	No	NP	No
343.	C231238215608	12/10/2023	2/11/2023	18/11/2023	18/06/2024	250	No	26/11/2023	N/A	No	N/A	Yes	NP
344.	C240238652847	20/10/2023	10/11/2023	18/11/2023	11/04/2024	174	No	4/12/2023	12/04/2024	No	No	Yes	Yes
345.	C231037619639	20/10/2023	10/11/2023	27/11/2023	16/04/2024	179	No	4/12/2023	3/05/2024	No	No	Yes	Yes
346.	C240238803192	20/10/2023	10/11/2023	18/11/2023	9/04/2024	172	No	4/12/2023	12/04/2024	No	No	Yes	Yes
347.	C230636248844	20/10/2023	10/11/2023	4/12/2023	6/04/2024	169	No	4/12/2023	6/04/2024	No	No	NP	No
348.	C231137895584	20/10/2023	10/11/2023	27/11/2023	26/04/2024	189	No	4/12/2023	21/05/2024	No	No	Yes	Yes
349.	C230937190655	20/10/2023	10/11/2023	27/11/2023	29/04/2024	192	No	4/12/2023	29/04/2024	No	No	Yes	Yes
350.	C231037613294	20/10/2023	10/11/2023	18/11/2023	20/05/2024	213	No	4/12/2023	22/07/2024	No	No	Yes	Yes
351.	C231037619607	21/10/2023	11/11/2023	27/11/2023	4/04/2024	166	No	5/12/2023	1/05/2024	No	No	Yes	Yes
352.	C231037619499	21/10/2023	11/11/2023	18/11/2023	4/03/2024	135	No	5/12/2023	12/03/2024	No	No	Yes	Yes
353.	C231037366123	21/10/2023	11/11/2023	18/11/2023	16/02/2024	118	No	5/12/2023	5/03/2024	No	No	Yes	Yes
354.	C240238802995	21/10/2023	11/11/2023	27/11/2023	15/04/2024	177	No	5/12/2023	3/05/2024	No	No	Yes	NP
355.	C231037652177	22/10/2023	12/11/2023	18/11/2023	4/03/2024	134	No	6/12/2023	31/07/2024	No	No	Yes	Yes
356.	C231037652104	22/10/2023	12/11/2023	27/11/2023	17/04/2024	178	No	6/12/2023	10/05/2024	No	No	Yes	No
357.	C231037652200	22/10/2023	12/11/2023	27/11/2023	1/04/2024	162	No	6/12/2023	11/04/2024	No	No	Yes	Yes
358.	C231138015475	22/10/2023	12/11/2023	18/11/2023	12/03/2024	142	No	6/12/2023	18/03/2024	No	No	Yes	Yes
359.	C230937295189	22/10/2023	12/11/2023	27/11/2023	10/06/2024	232	No	6/12/2023	16/07/2024	No	No	Yes	Yes
360.	C231037651873	22/10/2023	12/11/2023	18/11/2023	25/03/2024	155	No	6/12/2023	22/07/2024	No	No	Yes	Yes
361.	C231037652422	22/10/2023	12/11/2023	18/11/2023	17/04/2024	178	No	6/12/2023	17/07/2024	No	No	No	No
362.	C231037651883	22/10/2023	12/11/2023	27/11/2023	15/04/2024	176	No	6/12/2023	22/07/2024	No	No	Yes	Yes
363.	C231037651882	22/10/2023	12/11/2023	18/11/2023	9/05/2024	200	No	6/12/2023	27/05/2024	No	No	Yes	Yes
364.	C231037652144	22/10/2023	12/11/2023	27/11/2023	6/03/2024	136	No	6/12/2023	27/03/2024	No	No	Yes	Yes
365.	C231037652121	22/10/2023	12/11/2023	29/11/2023	30/05/2024	221	No	6/12/2023	15/07/2024	No	No	Yes	Yes
366.	C231037652167	22/10/2023	12/11/2023	27/11/2023	8/05/2024	199	No	6/12/2023	18/06/2024	No	No	Yes	Yes

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367.	C231037652224	22/10/2023	12/11/2023	18/11/2023	22/04/2024	183	No	6/12/2023	25/07/2024	No	No	Yes	Yes
368.	C231037651340	22/10/2023	12/11/2023	18/11/2023	17/05/2024	208	No	6/12/2023	30/07/2024	No	No	Yes	Yes
369.	C240138391699	23/10/2023	13/11/2023	4/12/2023	21/04/2024	181	No	7/12/2023	21/05/2024	No	No	NP	Yes
370.	C231138018813	23/10/2023	13/11/2023	18/11/2023	16/02/2024	116	No	7/12/2023	1/03/2024	No	No	Yes	Yes
371.	C231037544255	23/10/2023	13/11/2023	27/11/2023	27/03/2024	156	No	7/12/2023	2/04/2024	No	No	Yes	Yes
372.	C231037652404	23/10/2023	13/11/2023	18/11/2023	7/03/2024	136	No	7/12/2023	13/03/2024	No	No	Yes	NP
373.	C231037655330	23/10/2023	13/11/2023	18/11/2023	18/03/2024	147	No	7/12/2023	18/07/2024	No	No	Yes	Yes
374.	C231037652989	23/10/2023	13/11/2023	18/11/2023	8/06/2024	229	No	7/12/2023	8/07/2024	No	No	Yes	Yes
375.	C231037652664	23/10/2023	13/11/2023	N/A	26/06/2024	247	No	7/12/2023	21/08/2024	No	No	Yes	NP
376.	C231037660893	24/10/2023	14/11/2023	4/12/2023	U	U	No	8/12/2023	16/04/2024	No	No	NP	No
377.	C240238739822	24/10/2023	14/11/2023	18/11/2023	6/04/2024	165	No	8/12/2023	8/12/2023	No	Yes	NP	No*
378.	C231037655883	24/10/2023	14/11/2023	18/11/2023	29/02/2024	128	No	8/12/2023	11/07/2024	No	No	Yes	NP
379.	C231037662476	25/10/2023	15/11/2023	7/12/2023	22/03/2024	149	No	9/12/2023	22/03/2024	No	No	No	NP
380.	C231037663797	25/10/2023	15/11/2023	8/12/2023	U	U	No	9/12/2023	12/12/2023	No	No	NP	No
381.	C231037661570	25/10/2023	15/11/2023	14/06/2024	23/04/2024	181	No	9/12/2023	14/06/2024	No	No	Yes	Yes
382.	C231037674060	27/10/2023	17/11/2023	4/12/2023	8/05/2024	194	No	11/12/2023	22/07/2024	No	No	Yes	Yes
383.	C240338874857	27/10/2023	17/11/2023	4/12/2023	8/05/2024	194	No	11/12/2023	30/08/2024	No	No	Yes	NP
384.	C231037674419	27/10/2023	17/11/2023	4/12/2023	28/05/2024	214	No	11/12/2023	22/07/2024	No	No	Yes	Yes
385.	C231037676743	28/10/2023	18/11/2023	4/12/2023	10/04/2024	165	No	12/12/2023	10/05/2024	No	No	Yes	Yes
386.	C231037705560	28/10/2023	18/11/2023	4/12/2023	23/05/2024	208	No	12/12/2023	18/07/2024	No	No	Yes	Yes
387.	C231037676759	28/10/2023	18/11/2023	4/12/2023	19/04/2024	174	No	12/12/2023	22/07/2024	No	No	Yes	Yes
388.	C231037704082	30/10/2023	20/11/2023	4/12/2023	21/03/2024	143	No	14/12/2023	3/05/2024	No	No	Yes	Yes
389.	C230937287143	30/10/2023	20/11/2023	4/12/2023	16/02/2024	109	No	14/12/2023	4/03/2024	No	No	Yes	Yes
390.	C231037704458	30/10/2023	20/11/2023	4/12/2023	8/05/2024	191	No	14/12/2023	22/07/2024	No	No	Yes	Yes
391.	C231037708964	30/10/2023	20/11/2023	5/12/2023	17/05/2024	200	No	14/12/2023	22/07/2024	No	No	Yes	Yes

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392.	C231037704466	30/10/2023	20/11/2023	4/12/2023	8/05/2024	191	No	14/12/2023	17/07/2024	No	No	Yes	Yes
393.	C231037704383	30/10/2023	20/11/2023	4/12/2023	1/06/2024	215	No	14/12/2023	19/07/2024	No	No	Yes	Yes
394.	C231037704006	30/10/2023	20/11/2023	14/05/2024	23/11/2023	24	No	14/12/2023	14/05/2024	Yes	No	NP	No
395.	C240238614638	31/10/2023	21/11/2023	4/12/2023	7/03/2024	128	No	15/12/2023	13/03/2024	No	No	Yes	Yes
396.	C231137711089	1/11/2023	22/11/2023	4/12/2023	13/05/2024	194	No	16/12/2023	13/05/2024	No	No	NP	No
397.	C231137710974	1/11/2023	22/11/2023	4/12/2023	7/05/2024	188	No	16/12/2023	28/05/2024	No	No	Yes	Yes
398.	C231137773843	1/11/2023	22/11/2023	1/12/2023	30/04/2024	181	No	16/12/2023	18/05/2024	No	No	Yes	NP
399.	C231137711149	1/11/2023	22/11/2023	5/12/2023	13/05/2024	194	No	16/12/2023	23/07/2024	No	No	Yes	Yes
400.	C231137711620	1/11/2023	22/11/2023	4/12/2023	12/04/2024	163	No	16/12/2023	29/07/2024	No	No	Yes	Yes
401.	C231137712055	1/11/2023	22/11/2023	30/11/2023	22/05/2024	203	No	16/12/2023	22/05/2024	No	No	NP	No
402.	C231137712356	1/11/2023	22/11/2023	4/12/2023	18/06/2024	230	No	16/12/2023	24/07/2024	No	No	Yes	Yes
403.	C231137713047	1/11/2023	22/11/2023	23/11/2023	1/06/2024	213	No	16/12/2023	22/07/2024	No	No	Yes	Yes
404.	C231137711247	1/11/2023	22/11/2023	4/12/2023	2/06/2024	214	No	16/12/2023	25/07/2024	No	No	Yes	Yes
405.	C231137713986	2/11/2023	23/11/2023	5/12/2023	26/03/2024	145	No	17/12/2023	13/05/2024	No	No	Yes	Yes
406.	C240138375147	2/11/2023	23/11/2023	11/12/2023	16/02/2024	106	No	17/12/2023	15/12/2023	No	Yes	Yes	No*
407.	C231137713648	2/11/2023	23/11/2023	27/11/2023	25/06/2024	236	No	17/12/2023	25/06/2024	No	No	No	NP
408.	C231137733969	4/11/2023	25/11/2023	27/11/2023	10/04/2024	158	No	19/12/2023	18/07/2024	No	No	Yes	Yes
409.	C231137757640	5/11/2023	26/11/2023	11/12/2023	U	U	No	20/12/2023	20/12/2023	No	Yes	NP	NP
410.	C231137771114	6/11/2023	27/11/2023	28/11/2023	8/03/2024	123	No	21/12/2023	6/05/2024	No	No	Yes	NP
411.	C231238087164	6/11/2023	27/11/2023	11/12/2023	2/04/2024	148	No	21/12/2023	2/04/2024	No	No	Yes	Yes
412.	C240138390868	6/11/2023	27/11/2023	11/12/2023	5/04/2024	151	No	21/12/2023	10/05/2024	No	No	Yes	No
413.	C240238785744	7/11/2023	28/11/2023	27/12/2023	5/04/2024	150	No	22/12/2023	8/05/2024	No	No	Yes	Yes
414.	C231137773650	7/11/2023	28/11/2023	27/12/2023	17/06/2024	223	No	22/12/2023	30/07/2024	No	No	Yes	Yes
415.	C240238689543	8/11/2023	29/11/2023	11/12/2023	29/02/2024	113	No	23/12/2023	8/03/2024	No	No	Yes	Yes
416.	C231137773997	8/11/2023	29/11/2023	27/12/2023	1/06/2024	206	No	23/12/2023	22/07/2024	No	No	Yes	Yes

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417.	C231137789410	9/11/2023	30/11/2023	27/12/2023	16/05/2024	189	No	24/12/2023	16/05/2024	No	No	NP	Yes
418.	C231137789406	9/11/2023	30/11/2023	27/12/2023	10/05/2024	183	No	24/12/2023	26/06/2024	No	No	Yes	Yes
419.	C231137797059	10/11/2023	1/12/2023	4/12/2023	30/05/2024	202	No	25/12/2023	30/05/2024	No	No	NP	No
420.	C231137977543	10/11/2023	1/12/2023	27/12/2023	29/05/2024	201	No	25/12/2023	7/08/2024	No	No	Yes	Yes
421.	C240238618409	10/11/2023	1/12/2023	4/12/2023	30/05/2024	202	No	25/12/2023	26/07/2024	No	No	Yes	Yes
422.	C231137807768	11/11/2023	2/12/2023	4/12/2023	26/03/2024	136	No	26/12/2023	8/08/2024	No	No	Yes	No
423.	C231137827145	12/11/2023	3/12/2023	11/12/2023	14/05/2024	184	No	27/12/2023	19/07/2024	No	No	Yes	Yes
424.	C231137828263	13/11/2023	4/12/2023	4/12/2023	5/02/2024	84	Yes	28/12/2023	22/07/2024	No	No	Yes	Yes
425.	C231137861659	14/11/2023	5/12/2023	5/12/2023	7/03/2024	114	Yes	29/12/2023	7/03/2024	No	No	Yes	Yes
426.	C220933203259	14/11/2023	5/12/2023	21/03/2024	13/06/2024	212	No	29/12/2023	26/07/2024	No	No	No	NP
427.	C231137855364	14/11/2023	5/12/2023	5/12/2023	25/06/2024	224	Yes	29/12/2023	11/07/2024	No	No	Yes	NP
428.	C231137855347	14/11/2023	5/12/2023	5/12/2023	15/05/2024	183	Yes	29/12/2023	14/06/2024	No	No	Yes	Yes
429.	C231137855522	14/11/2023	5/12/2023	13/12/2023	9/05/2024	177	No	29/12/2023	26/07/2024	No	No	Yes	Yes
430.	C231037590718	15/11/2023	6/12/2023	7/12/2023	12/04/2024	149	No	30/12/2023	13/05/2024	No	No	Yes	Yes
431.	C240238692046	15/11/2023	6/12/2023	7/12/2023	15/05/2024	182	No	30/12/2023	17/05/2024	No	No	Yes	Yes
432.	C240238613949	15/11/2023	6/12/2023	11/12/2023	21/03/2024	127	No	30/12/2023	21/03/2024	No	No	Yes	NP
433.	C231137941493	15/11/2023	6/12/2023	7/12/2023	4/04/2024	141	No	30/12/2023	26/07/2024	No	No	Yes	Yes
434.	C231137881919	15/11/2023	6/12/2023	7/12/2023	27/06/2024	225	No	30/12/2023	26/07/2024	No	No	Yes	Yes
435.	C231137882859	15/11/2023	6/12/2023	7/12/2023	8/06/2024	206	No	30/12/2023	12/07/2024	No	No	Yes	Yes
436.	C231137711171	16/11/2023	7/12/2023	7/12/2023	16/03/2024	121	Yes	31/12/2023	8/05/2024	No	No	Yes	Yes
437.	C231137758980	16/11/2023	7/12/2023	7/12/2023	12/04/2024	148	Yes	31/12/2023	3/05/2024	No	No	Yes	Yes
438.	C231137889302	16/11/2023	7/12/2023	7/12/2023	10/05/2024	176	Yes	31/12/2023	24/07/2024	No	No	Yes	Yes
439.	C231137889334	16/11/2023	7/12/2023	7/12/2023	14/05/2024	180	Yes	31/12/2023	24/07/2024	No	No	Yes	Yes
440.	C231137890830	16/11/2023	7/12/2023	7/12/2023	23/05/2024	189	Yes	31/12/2023	13/06/2024	No	No	Yes	Yes
441.	C231137888595	16/11/2023	7/12/2023	7/12/2023	24/05/2024	190	Yes	31/12/2023	31/05/2024	No	No	Yes	Yes

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442.	C231137888902	16/11/2023	7/12/2023	7/12/2023	30/05/2024	196	Yes	31/12/2023	28/06/2024	No	No	Yes	Yes
443.	C231137892973	16/11/2023	7/12/2023	7/12/2023	6/06/2024	203	Yes	31/12/2023	22/07/2024	No	No	Yes	Yes
444.	C240138495290	17/11/2023	8/12/2023	8/12/2023	16/02/2024	91	Yes	1/01/2024	4/03/2024	No	No	Yes	Yes
445.	C231137970117	17/11/2023	8/12/2023	5/01/2024	21/06/2024	217	No	1/01/2024	12/07/2024	No	No	Yes	Yes
446.	C231137899602	18/11/2023	9/12/2023	27/12/2023	20/05/2024	184	No	2/01/2024	2/01/2024	No	Yes	NP	NP
447.	C231137899531	18/11/2023	9/12/2023	27/12/2023	29/05/2024	193	No	2/01/2024	15/07/2024	No	No	Yes	Yes
448.	C231137899573	18/11/2023	9/12/2023	11/12/2023	5/06/2024	200	No	2/01/2024	16/07/2024	No	No	Yes	Yes
449.	C231137889268	18/11/2023	9/12/2023	7/12/2023	27/05/2024	191	Yes	2/01/2024	16/07/2024	No	No	Yes	Yes
450.	C231137899589	18/11/2023	9/12/2023	27/12/2023	9/05/2024	173	No	2/01/2024	17/07/2024	No	No	Yes	Yes
451.	C231137899576	18/11/2023	9/12/2023	27/12/2023	12/04/2024	146	No	2/01/2024	23/07/2024	No	No	Yes	Yes
452.	C231137938844	19/11/2023	10/12/2023	27/12/2023	16/04/2024	149	No	3/01/2024	14/08/2024	No	No	Yes	Yes
453.	C231137938840	19/11/2023	10/12/2023	27/12/2023	6/04/2024	139	No	3/01/2024	6/04/2024	No	No	NP	No
454.	C231137938870	19/11/2023	10/12/2023	27/12/2023	1/06/2024	195	No	3/01/2024	22/07/2024	No	No	Yes	Yes
455.	C231137938831	19/11/2023	10/12/2023	22/07/2024	4/06/2024	198	No	3/01/2024	22/07/2024	No	No	Yes	Yes
456.	C231137941174	20/11/2023	11/12/2023	27/12/2023	12/04/2024	144	No	4/01/2024	12/04/2024	No	No	NP	No
457.	C240138464887	20/11/2023	11/12/2023	27/12/2023	12/04/2024	144	No	4/01/2024	4/01/2024	No	Yes	Yes	Yes
458.	C231238103041	20/11/2023	11/12/2023	27/12/2023	30/04/2024	162	No	4/01/2024	10/05/2024	No	No	Yes	Yes
459.	C231137796627	20/11/2023	11/12/2023	11/12/2023	14/05/2024	176	Yes	4/01/2024	26/06/2024	No	No	Yes	Yes
460.	C231137945343	20/11/2023	11/12/2023	11/12/2023	30/05/2024	192	Yes	4/01/2024	15/07/2024	No	No	Yes	Yes
461.	C231137941739	20/11/2023	11/12/2023	11/12/2023	24/06/2024	217	Yes	4/01/2024	22/07/2024	No	No	Yes	Yes
462.	C231137947785	20/11/2023	11/12/2023	27/12/2023	11/03/2024	112	No	4/01/2024	11/03/2024	No	No	Yes	Yes
463.	C231137963075	20/11/2023	11/12/2023	19/01/2024	16/05/2024	178	No	4/01/2024	12/07/2024	No	No	Yes	Yes
464.	C240138418104	21/11/2023	12/12/2023	29/04/2024	15/04/2024	146	No	5/01/2024	10/05/2024	No	No	Yes	Yes
465.	C231137964048	21/11/2023	12/12/2023	27/12/2023	28/06/2024	220	No	5/01/2024	26/07/2024	No	No	Yes	No
466.	C231037656189	22/11/2023	13/12/2023	14/12/2023	9/05/2024	169	No	6/01/2024	9/05/2024	No	No	NP	No

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467.	C231238068695	22/11/2023	13/12/2023	1/05/2024	1/05/2024	161	No	6/01/2024	3/07/2024	No
468.	C231137975840	22/11/2023	13/12/2023	14/12/2023	12/06/2024	203	No	6/01/2024	22/07/2024	No
469.	C231137970063	22/11/2023	13/12/2023	5/01/2024	5/06/2024	196	No	6/01/2024	23/07/2024	No
470.	C231137972021	22/11/2023	13/12/2023	20/12/2023	14/05/2024	174	No	6/01/2024	28/06/2024	No
471.	C231137971821	22/11/2023	13/12/2023	13/12/2023	14/05/2024	174	Yes	6/01/2024	22/07/2024	No
472.	C231137976195	23/11/2023	14/12/2023	27/12/2023	29/04/2024	158	No	7/01/2024	29/04/2024	No
473.	C231137975182	23/11/2023	14/12/2023	N/A	25/06/2024	215	Yes	7/01/2024	12/12/2023	No
474.	C231137977082	23/11/2023	14/12/2023	5/01/2024	28/05/2024	187	No	7/01/2024	19/07/2024	No
475.	C231137976554	23/11/2023	14/12/2023	20/12/2023	22/05/2024	181	Yes	7/01/2024	8/12/2023	No
476.	C231137976692	23/11/2023	14/12/2023	27/12/2023	14/05/2024	173	No	7/01/2024	22/07/2024	No
477.	C231037543487	24/11/2023	15/12/2023	15/12/2023	7/03/2024	104	Yes	8/01/2024	15/03/2024	No
478.	C231137979027	24/11/2023	15/12/2023	27/12/2023	11/03/2024	108	No	8/01/2024	29/07/2024	No
479.	C231137979136	24/11/2023	15/12/2023	15/12/2023	14/05/2024	172	Yes	8/01/2024	24/07/2024	No
480.	C231137979423	24/11/2023	15/12/2023	2/01/2024	13/02/2024	81	No	8/01/2024	8/01/2024	No
481.	C240138372521	25/11/2023	16/12/2023	8/01/2024	17/06/2024	205	No	9/01/2024	29/07/2024	No
482.	C231137981812	25/11/2023	16/12/2023	27/12/2023	23/04/2024	150	No	9/01/2024	25/07/2024	No
483.	C231138004022	26/11/2023	17/12/2023	11/01/2024	12/04/2024	138	No	10/01/2024	31/07/2024	No
484.	C231138004177	26/11/2023	17/12/2023	11/01/2024	8/06/2024	195	No	10/01/2024	17/07/2024	No
485.	C231138015200	27/11/2023	18/12/2023	12/01/2024	18/07/2024	234	No	11/01/2024	25/07/2024	No
486.	C231138004928	27/11/2023	18/12/2023	11/01/2024	6/04/2024	131	No	11/01/2024	6/04/2024	No
487.	C231138004813	27/11/2023	18/12/2023	11/01/2024	23/05/2024	178	No	11/01/2024	15/07/2024	No
488.	C240339083843	28/11/2023	19/12/2023	20/12/2023	16/05/2024	170	No	12/01/2024	17/05/2024	No
489.	C231138012918	28/11/2023	19/12/2023	20/12/2023	18/04/2024	142	No	12/01/2024	22/07/2024	No
490.	C240138262764	29/11/2023	20/12/2023	12/01/2024	21/05/2024	174	No	13/01/2024	21/05/2024	No
491.	C231138015389	29/11/2023	20/12/2023	20/12/2023	20/05/2024	173	Yes	13/01/2024	12/01/2024	No

on ys	(k) Did HBAU advise Investigation Outcome within 45 days (Yes/No)	(I) Did HBAU refer to Liability Rules in completing its Investigation (Yes/No)	(m) Did HBAU refer to Liability Rules in its Investigation Outcome (Yes/No)
	No	Yes	Yes
	No	NP	No
	Yes	No	No*
	No	Yes	Yes
	Yes	Yes	No*
	No	Yes	Yes
	Yes	Yes	Yes
	No	Yes	NP
	No	Yes	Yes
	No	Yes	Yes
	No	Yes	Yes
	No	No	Yes
	No	NP	No
	No	Yes	Yes
	Yes	NP	NP

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492.	C231138015774	29/11/2023	20/12/2023	20/12/2023	27/06/2024	211	Yes	13/01/2024	24/07/2024	No
493.	C231138016789	29/11/2023	20/12/2023	20/12/2023	15/05/2024	168	Yes	13/01/2024	24/07/2024	No
494.	C231138017473	29/11/2023	20/12/2023	20/12/2023	21/06/2024	205	Yes	13/01/2024	19/07/2024	No
495.	C230937227026	30/11/2023	21/12/2023	20/12/2023	16/02/2024	78	Yes	14/01/2024	8/02/2024	No
496.	C231138018799	30/11/2023	21/12/2023	12/01/2024	27/06/2024	210	No	14/01/2024	22/07/2024	No
497.	C231138019379	30/11/2023	21/12/2023	20/12/2023	12/04/2024	134	Yes	14/01/2024	12/04/2024	No
498.	C231138019699	30/11/2023	21/12/2023	12/01/2024	26/04/2024	148	No	14/01/2024	28/06/2024	No
499.	C231138019468	30/11/2023	21/12/2023	20/12/2023	30/04/2024	152	Yes	14/01/2024	23/07/2024	No
500.	C240238627004	1/12/2023	22/12/2023	13/12/2023	13/02/2024	74	Yes	15/01/2024	20/12/2023	No
501.	C231238025936	1/12/2023	22/12/2023	15/01/2024	22/02/2024	83	No	15/01/2024	15/01/2024	No
502.	C231137981665	1/12/2023	22/12/2023	8/01/2024	31/05/2024	182	No	15/01/2024	31/05/2024	No
503.	C231238026718	2/12/2023	23/12/2023	23/12/2023	8/04/2024	128	Yes	16/01/2024	19/04/2024	No
504.	C240338926203	15/03/2024	5/04/2024	2/04/2024	9/05/2024	55	Yes	29/04/2024	U	No
505.	C231238026986	2/12/2023	23/12/2023	22/12/2023	1/05/2024	151	Yes	16/01/2024	19/07/2024	No
506.	C231238031419	3/12/2023	24/12/2023	17/05/2024	9/08/2024	250	No	17/01/2024	22/07/2024	No
507.	C231238045428	3/12/2023	24/12/2023	18/01/2024	18/04/2024	137	No	17/01/2024	18/04/2024	No
508.	C231238045853	4/12/2023	25/12/2023	18/01/2024	2/06/2024	181	No	18/01/2024	25/07/2024	No
509.	C231238046525	4/12/2023	25/12/2023	20/12/2023	29/05/2024	177	Yes	18/01/2024	9/07/2024	No
510.	C231238047679	5/12/2023	26/12/2023	20/12/2023	27/03/2024	113	Yes	19/01/2024	26/03/2024	No
511.	C231238050591	5/12/2023	26/12/2023	19/01/2024	U	U	No	19/01/2024	31/05/2024	No
512.	C231238049128	5/12/2023	26/12/2023	20/12/2023	6/06/2024	184	Yes	19/01/2024	26/07/2024	No
513.	C231238048868	5/12/2023	26/12/2023	19/01/2024	10/05/2024	157	No	19/01/2024	17/07/2024	No
514.	C231238050050	5/12/2023	26/12/2023	19/01/2024	29/05/2024	176	No	19/01/2024	22/07/2024	No
515.	C231238049256	5/12/2023	26/12/2023	20/12/2023	17/04/2024	134	Yes	19/01/2024	22/07/2024	No
516.	C231238052241	6/12/2023	27/12/2023	19/01/2024	2/06/2024	179	No	20/01/2024	12/06/2024	No

(k) Did HBAU advise Investigation Outcome within 45 days (Yes/No)	(I) Did HBAU refer to Liability Rules in completing its Investigation (Yes/No)	(m) Did HBAU refer to Liability Rules in its Investigation Outcome (Yes/No)
No	Yes	Yes
No	NP	No
No	Yes	Yes
No	Yes	Yes
Yes	Yes	Yes
Yes	Yes	NP
No	NP	No
No	Yes	Yes
No	Yes	NP
No	Yes	Yes
No	Yes	Yes
No	NP	No
No	Yes	Yes
No	Yes	Yes
No	Yes	Yes
No	NP	No
No	Yes	Yes

Row	(a) UCM reference	(b) Date HBAU received UAR	(c) Date HBAU required to either complete Investigation/ or advise Investigation Outcome (21 days)	(d) Date of Extra Time Request (where made)	(e) Date HBAU completed its Investigation	(f) Number of days taken to complete Investigation	(g) Did HBAU make Extra Time Request or complete Investigation within 21 days (Yes/No)	(h) Date HBAU required to complete Investigation (45 days) where applicable	(i) Date HBAU advised Investigation Outcome	(j) Did HBAU complete Investigation within 45 days (Yes/No)	(k) Did HBAU advise Investigation Outcome within 45 days (Yes/No)	(I) Did HBAU refer to Liability Rules in completing its Investigation (Yes/No)	(m) Did HBAU refer to Liability Rules in its Investigation Outcome (Yes/No)
517.	C231238052159	6/12/2023	27/12/2023	19/01/2024	7/05/2024	153	No	20/01/2024	2/07/2024	No	No	Yes	Yes
518.	C231238052244	6/12/2023	27/12/2023	19/01/2024	6/04/2024	122	No	20/01/2024	6/04/2024	No	No	NP	No
519.	C231238052049	6/12/2023	27/12/2023	19/01/2024	3/05/2024	149	No	20/01/2024	23/07/2024	No	No	Yes	Yes
520.	C240338968375	7/12/2023	28/12/2023	4/01/2024	22/02/2024	77	No	21/01/2024	5/03/2024	No	No	Yes	Yes
521.	C240138445503	8/12/2023	29/12/2023	22/01/2024	6/04/2024	120	No	22/01/2024	6/04/2024	No	No	NP	No
522.	C231238070364	8/12/2023	29/12/2023	29/12/2023	17/04/2024	131	Yes	22/01/2024	21/05/2024	No	No	Yes	NP
523.	C220832973975	14/08/2022	4/09/2022	27/09/2022	30/09/2022	47	No	28/09/2022	27/09/2022	No	Yes	No	No*
524.	C231238070636	8/12/2023	29/12/2023	22/01/2024	21/05/2024	165	No	22/01/2024	11/07/2024	No	No	Yes	Yes
525.	C231238070286	8/12/2023	29/12/2023	22/01/2024	U	U	No	22/01/2024	22/01/2024	No	Yes	NP	NP
526.	C231238071074	8/12/2023	29/12/2023	20/12/2023	29/05/2024	173	Yes	22/01/2024	22/07/2024	No	No	Yes	Yes
527.	C231238072519	8/12/2023	29/12/2023	20/12/2023	8/04/2024	122	Yes	22/01/2024	26/07/2024	No	No	Yes	Yes
528.	C231238070768	8/12/2023	29/12/2023	22/01/2024	7/06/2024	182	No	22/01/2024	22/07/2024	No	No	Yes	Yes
529.	C231238085468	9/12/2023	30/12/2023	20/12/2023	7/05/2024	150	Yes	23/01/2024	3/07/2024	No	No	Yes	Yes
530.	C231238085810	9/12/2023	30/12/2023	20/12/2023	7/06/2024	181	Yes	23/01/2024	18/07/2024	No	No	Yes	Yes
531.	C231238085416	9/12/2023	30/12/2023	20/12/2023	25/04/2024	138	Yes	23/01/2024	26/07/2024	No	No	Yes	NP
532.	C231238086508	11/12/2023	1/01/2024	20/12/2023	25/04/2024	136	Yes	25/01/2024	20/05/2024	No	No	Yes	NP
533.	C231037544137	11/12/2023	1/01/2024	25/01/2024	14/05/2024	155	No	25/01/2024	14/05/2024	No	No	Yes	Yes
534.	C240138359142	11/12/2023	1/01/2024	25/01/2024	26/04/2024	137	No	25/01/2024	26/04/2024	No	No	NP	No
535.	C230937303164	11/12/2023	1/01/2024	27/04/2024	27/04/2024	138	No	25/01/2024	14/05/2024	No	No	Yes	Yes
536.	C231238087652	11/12/2023	1/01/2024	25/01/2024	17/05/2024	158	No	25/01/2024	22/07/2024	No	No	Yes	Yes
537.	C231238086627	11/12/2023	1/01/2024	25/01/2024	8/04/2024	119	No	25/01/2024	8/07/2024	No	No	Yes	Yes
538.	C231238087689	11/12/2023	1/01/2024	25/01/2024	29/04/2024	140	No	25/01/2024	23/07/2024	No	No	NP	NP
539.	C231238086470	11/12/2023	1/01/2024	20/12/2023	U	U	Yes	25/01/2024	25/01/2024	No	Yes	NP	NP
540.	C231238086619	11/12/2023	1/01/2024	20/12/2023	14/03/2024	94	Yes	25/01/2024	15/03/2024	No	No	Yes	Yes
541.	C231037615567	12/12/2023	2/01/2024	25/01/2024	18/03/2024	97	No	26/01/2024	18/03/2024	No	No	Yes	Yes

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542.	C240138391738	12/12/2023	2/01/2024	20/12/2023	4/04/2024	114	Yes	26/01/2024	8/05/2024	No
543.	C231238104503	12/12/2023	2/01/2024	25/01/2024	25/06/2024	196	No	26/01/2024	23/07/2024	No
544.	C240238618626	13/12/2023	3/01/2024	25/01/2024	4/01/2024	22	No	27/01/2024	26/04/2024	Yes
545.	C231238128226	13/12/2023	3/01/2024	25/01/2024	17/05/2024	156	No	27/01/2024	17/07/2024	No
546.	C240138417314	13/12/2023	3/01/2024	5/02/2024	21/06/2024	191	No	27/01/2024	22/07/2024	No
547.	C231238129910	13/12/2023	3/01/2024	25/01/2024	9/06/2024	179	No	27/01/2024	22/07/2024	No
548.	C231238129343	13/12/2023	3/01/2024	25/01/2024	30/05/2024	169	No	27/01/2024	22/07/2024	No
549.	C231238128382	13/12/2023	3/01/2024	4/01/2024	10/06/2024	180	No	27/01/2024	16/07/2024	No
550.	C240539424223	14/12/2023	4/01/2024	30/05/2024	3/06/2024	172	No	28/01/2024	22/07/2024	No
551.	C240138466825	14/12/2023	4/01/2024	25/01/2024	19/04/2024	127	No	28/01/2024	10/05/2024	No
552.	C231238132884	14/12/2023	4/01/2024	25/01/2024	30/04/2024	138	No	28/01/2024	24/05/2024	No
553.	C231238146016	15/12/2023	5/01/2024	29/01/2024	U	U	No	29/01/2024	5/06/2024	No
554.	C231238145556	15/12/2023	5/01/2024	25/01/2024	28/06/2024	196	No	29/01/2024	25/01/2024	No
555.	C231238202569	15/12/2023	5/01/2024	12/01/2024	19/03/2024	95	No	29/01/2024	22/03/2024	No
556.	C240138557043	18/12/2023	8/01/2024	11/01/2024	17/04/2024	121	No	1/02/2024	15/05/2024	No
557.	C231238178032	18/12/2023	8/01/2024	21/12/2023	8/02/2024	52	Yes	1/02/2024	8/02/2024	No
558.	C231238176668	18/12/2023	8/01/2024	11/01/2024	29/04/2024	133	No	1/02/2024	22/07/2024	No
559.	C231238178054	18/12/2023	8/01/2024	U	8/02/2024	52	No	1/02/2024	8/02/2024	No
560.	C231238212415	19/12/2023	9/01/2024	11/01/2024	17/05/2024	150	No	2/02/2024	29/05/2024	No
561.	C231238212762	19/12/2023	9/01/2024	2/02/2024	19/03/2024	91	No	2/02/2024	2/02/2024	No
562.	C231238203258	19/12/2023	9/01/2024	11/01/2024	20/04/2024	123	No	2/02/2024	17/07/2024	No
563.	C231238213161	19/12/2023	9/01/2024	11/01/2024	18/04/2024	121	No	2/02/2024	22/07/2024	No
564.	C231138013889	20/12/2023	10/01/2024	11/01/2024	4/04/2024	106	No	3/02/2024	16/04/2024	No
565.	C231238222228	20/12/2023	10/01/2024	10/01/2024	7/05/2024	139	Yes	3/02/2024	9/05/2024	No
566.	C231238214780	20/12/2023	10/01/2024	11/01/2024	31/05/2024	163	No	3/02/2024	22/07/2024	No

(k) Did HBAU advise Investigation Outcome within 45 days (Yes/No)	(I) Did HBAU refer to Liability Rules in completing its Investigation (Yes/No)	(m) Did HBAU refer to Liability Rules in its Investigation Outcome (Yes/No)
No	Yes	Yes
No	No	No
No	Yes	Yes
No	Yes	Yes
No	NP	No
Yes	Yes	NP
No	Yes	NP
No	Yes	Yes
Yes	Yes	NP
No	Yes	Yes

Row	(a) UCM reference	(b) Date HBAU received UAR	(c) Date HBAU required to either complete Investigation/ or advise Investigation Outcome (21 days)	(d) Date of Extra Time Request (where made)	(e) Date HBAU completed its Investigation	(f) Number of days taken to complete Investigation	(g) Did HBAU make Extra Time Request or complete Investigation within 21 days (Yes/No)	(h) Date HBAU required to complete Investigation (45 days) where applicable	(i) Date HBAU advised Investigation Outcome	(j) Did HBAU complete Investigation within 45 days (Yes/No)	(k) Did HBAU advise Investigation Outcome within 45 days (Yes/No)	(I) Did HBAU refer to Liability Rules in completing its Investigation (Yes/No)	(m) Did HBAU refer to Liability Rules in its Investigation Outcome (Yes/No)
567.	C231238218215	20/12/2023	10/01/2024	11/01/2024	17/05/2024	149	No	3/02/2024	18/07/2024	No	No	Yes	Yes
568.	C231238223854	21/12/2023	11/01/2024	11/01/2024	3/06/2024	165	Yes	4/02/2024	22/07/2024	No	No	Yes	Yes
569.	C231238231023	22/12/2023	12/01/2024	12/01/2024	19/06/2024	180	Yes	5/02/2024	22/07/2024	No	No	Yes	Yes
570.	C231238236766	23/12/2023	13/01/2024	12/01/2024	U	U	Yes	6/02/2024	5/02/2024	No	Yes	NP	NP
571.	C231238248185	24/12/2023	14/01/2024	19/01/2024	10/06/2024	169	No	7/02/2024	19/07/2024	No	No	Yes	Yes
572.	C231238237082	24/12/2023	14/01/2024	8/02/2024	17/05/2024	145	No	7/02/2024	3/07/2024	No	No	Yes	Yes
573.	C231238239739	25/12/2023	15/01/2024	U	26/06/2024	184	No	8/02/2024	1/10/2024	No	No	Yes	NP
574.	C231238240776	26/12/2023	16/01/2024	16/01/2024	18/04/2024	114	Yes	9/02/2024	24/05/2024	No	No	Yes	Yes
575.	C231238242418	27/12/2023	17/01/2024	12/01/2024	4/06/2024	160	Yes	10/02/2024	26/07/2024	No	No	Yes	Yes
576.	C231238243129	27/12/2023	17/01/2024	9/02/2024	6/02/2024	41	No	10/02/2024	4/03/2024	Yes	No	Yes	Yes
577.	C231238242192	27/12/2023	17/01/2024	9/02/2024	7/06/2024	163	No	10/02/2024	9/02/2024	No	Yes	Yes	NP
578.	C231238247429	28/12/2023	18/01/2024	12/01/2024	20/05/2024	144	Yes	11/02/2024	22/07/2024	No	No	Yes	Yes
579.	C231238248045	29/12/2023	19/01/2024	18/01/2024	23/02/2024	56	Yes	12/02/2024	14/03/2024	No	No	Yes	Yes
580.	C231238247916	29/12/2023	19/01/2024	12/02/2024	28/04/2024	121	No	12/02/2024	17/07/2024	No	No	Yes	NP
581.	C231238254733	30/12/2023	20/01/2024	13/02/2024	12/06/2024	165	No	13/02/2024	22/07/2024	No	No	Yes	Yes
582.	C240138257916	2/01/2024	23/01/2024	25/01/2024	1/05/2024	120	No	16/02/2024	22/07/2024	No	No	Yes	Yes
583.	C240138260859	3/01/2024	24/01/2024	24/01/2024	6/03/2024	63	Yes	17/02/2024	6/06/2024	No	No	No	Yes
584.	C231238070541	3/01/2024	24/01/2024	24/01/2024	7/05/2024	125	Yes	17/02/2024	13/05/2024	No	No	Yes	No
585.	C231037655910	3/01/2024	24/01/2024	24/01/2024	13/03/2024	70	Yes	17/02/2024	20/03/2024	No	No	Yes	NP
586.	C240138259893	3/01/2024	24/01/2024	24/01/2024	31/05/2024	149	Yes	17/02/2024	22/07/2024	No	No	Yes	Yes
587.	C240138262639	3/01/2024	24/01/2024	24/01/2024	17/05/2024	135	Yes	17/02/2024	23/07/2024	No	No	Yes	Yes
588.	C240138262950	3/01/2024	24/01/2024	24/01/2024	23/04/2024	111	Yes	17/02/2024	24/07/2024	No	No	Yes	Yes
589.	C240138262779	3/01/2024	24/01/2024	24/01/2024	30/05/2024	148	Yes	17/02/2024	22/07/2024	No	No	Yes	Yes
590.	C240138263045	3/01/2024	24/01/2024	25/01/2024	28/05/2024	146	No	17/02/2024	16/07/2024	No	No	Yes	Yes
591.	C240138260825	3/01/2024	24/01/2024	24/01/2024	28/05/2024	146	Yes	17/02/2024	19/07/2024	No	No	Yes	Yes

Row	(a) UCM reference	(b) Date HBAU received UAR	(c) Date HBAU required to either complete Investigation/ or advise Investigation Outcome (21 days)	(d) Date of Extra Time Request (where made)	(e) Date HBAU completed its Investigation	(f) Number of days taken to complete Investigation	(g) Did HBAU make Extra Time Request or complete Investigation within 21 days (Yes/No)	(h) Date HBAU required to complete Investigation (45 days) where applicable	(i) Date HBAU advised Investigation Outcome	(j) Did HBAU complete Investigation within 45 days (Yes/No)	(k) Did HBAU advise Investigation Outcome within 45 days (Yes/No)	(I) Did HBAU refer to Liability Rules in completing its Investigation (Yes/No)	(m) Did HBAU refer to Liability Rules in its Investigation Outcome (Yes/No)
592.	C240138441502	4/01/2024	25/01/2024	25/01/2024	9/04/2024	96	Yes	18/02/2024	9/05/2024	No	No	Yes	Yes
593.	C240138284517	5/01/2024	26/01/2024	25/01/2024	6/04/2024	92	Yes	19/02/2024	6/04/2024	No	No	NP	No
594.	C240138292025	5/01/2024	26/01/2024	29/08/2024	21/06/2024	168	No	19/02/2024	29/08/2024	No	No	Yes	Yes
595.	C240138312508	7/01/2024	28/01/2024	29/01/2024	12/04/2024	96	No	21/02/2024	12/04/2024	No	No	NP	No
596.	C230836639046	7/01/2024	28/01/2024	2/02/2024	6/06/2024	151	No	21/02/2024	6/08/2024	No	No	Yes	Yes
597.	C240138312683	8/01/2024	29/01/2024	29/01/2024	1/03/2024	53	Yes	22/02/2024	1/03/2024	No	No	Yes	No
598.	C221033839169	1/11/2022	22/11/2022	9/12/2022	U	U	No	16/12/2022	9/12/2022	No	Yes	No	No*
599.	C240138313326	8/01/2024	29/01/2024	29/01/2024	19/06/2024	163	Yes	22/02/2024	26/07/2024	No	No	Yes	Yes
600.	C240138320610	9/01/2024	30/01/2024	30/01/2024	12/04/2024	94	Yes	23/02/2024	15/03/2024	No	No	Yes	NP
601.	C240138319141	9/01/2024	30/01/2024	30/01/2024	20/05/2024	132	Yes	23/02/2024	26/07/2024	No	No	Yes	Yes
602.	C231238025980	10/01/2024	31/01/2024	31/01/2024	15/03/2024	65	Yes	24/02/2024	23/04/2024	No	No	Yes	Yes
603.	C231037503174	10/01/2024	31/01/2024	31/01/2024	20/05/2024	131	Yes	24/02/2024	22/07/2024	No	No	Yes	Yes
604.	C240138335943	10/01/2024	31/01/2024	30/01/2024	23/07/2024	195	Yes	24/02/2024	23/02/2024	No	Yes	No	NP
605.	C240138334813	10/01/2024	31/01/2024	31/01/2024	14/05/2024	125	Yes	24/02/2024	16/07/2024	No	No	Yes	Yes
606.	C240138334830	10/01/2024	31/01/2024	31/01/2024	6/06/2024	148	Yes	24/02/2024	22/07/2024	No	No	Yes	Yes
607.	C240138322929	10/01/2024	31/01/2024	31/01/2024	5/06/2024	147	Yes	24/02/2024	22/07/2024	No	No	Yes	Yes
608.	C240138334666	10/01/2024	31/01/2024	31/01/2024	18/04/2024	99	Yes	24/02/2024	18/07/2024	No	No	Yes	Yes
609.	C240138359151	11/01/2024	1/02/2024	1/02/2024	12/04/2024	92	Yes	25/02/2024	12/04/2024	No	No	NP	No
610.	C240138357268	11/01/2024	1/02/2024	1/02/2024	20/05/2024	130	Yes	25/02/2024	22/07/2024	No	No	Yes	Yes
611.	C231137882684	11/01/2024	1/02/2024	1/02/2024	16/02/2024	36	Yes	25/02/2024	15/03/2024	Yes	No	Yes	Yes
612.	C240138357488	11/01/2024	1/02/2024	1/02/2024	19/06/2024	160	Yes	25/02/2024	24/07/2024	No	No	Yes	Yes
613.	C240138356501	11/01/2024	1/02/2024	1/02/2024	29/05/2024	139	Yes	25/02/2024	22/07/2024	No	No	Yes	Yes
614.	C240138357125	11/01/2024	1/02/2024	1/02/2024	5/06/2024	146	Yes	25/02/2024	22/07/2024	No	No	Yes	Yes
615.	C240138357538	11/01/2024	1/02/2024	1/02/2024	2/06/2024	143	Yes	25/02/2024	22/07/2024	No	No	Yes	Yes
616.	C230937007417	12/01/2024	2/02/2024	2/02/2024	19/04/2024	98	Yes	26/02/2024	13/05/2024	No	No	Yes	Yes

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617.	C230937236994	12/01/2024	2/02/2024	2/02/2024	31/05/2024	140	Yes	26/02/2024	31/05/2024	No	No	NP	No
618.	C230736426233	12/01/2024	2/02/2024	2/02/2024	15/03/2024	63	Yes	26/02/2024	26/04/2024	No	No	Yes	Yes
619.	C231137889234	12/01/2024	2/02/2024	2/02/2024	6/04/2024	85	Yes	26/02/2024	6/04/2024	No	No	NP	No
620.	C231238086638	12/01/2024	2/02/2024	2/02/2024	16/02/2024	35	Yes	26/02/2024	4/03/2024	Yes	No	Yes	NP
621.	C240138386648	12/01/2024	2/02/2024	2/02/2024	20/05/2024	129	Yes	26/02/2024	18/07/2024	No	No	Yes	NP
622.	C240138386650	12/01/2024	2/02/2024	2/02/2024	20/05/2024	129	Yes	26/02/2024	22/07/2024	No	No	Yes	NP
623.	C240138383379	12/01/2024	2/02/2024	2/02/2024	25/04/2024	104	Yes	26/02/2024	30/07/2024	No	No	Yes	Yes
624.	C240840296244	12/01/2024	2/02/2024	N/A	3/09/2024	235	No	26/02/2024	1/10/2024	No	No	Yes	Yes
625.	C231137979088	13/01/2024	3/02/2024	5/02/2024	2/05/2024	110	No	27/02/2024	3/05/2024	No	No	Yes	NP
626.	C240238574928	13/01/2024	3/02/2024	2/02/2024	14/03/2024	61	Yes	27/02/2024	15/03/2024	No	No	Yes	Yes
627.	C240138391786	13/01/2024	3/02/2024	2/02/2024	5/04/2024	83	Yes	27/02/2024	19/08/2024	No	No	Yes	Yes
628.	C240138393314	13/01/2024	3/02/2024	5/02/2024	8/06/2024	147	No	27/02/2024	30/07/2024	No	No	Yes	Yes
629.	C240138417578	13/01/2024	3/02/2024	5/02/2024	23/04/2024	101	No	27/02/2024	22/07/2024	No	No	Yes	Yes
630.	C240138396216	14/01/2024	4/02/2024	2/02/2024	21/05/2024	128	Yes	28/02/2024	26/08/2024	No	No	Yes	Yes
631.	C240138418531	14/01/2024	4/02/2024	5/02/2024	18/06/2024	156	No	28/02/2024	19/07/2024	No	No	Yes	Yes
632.	C240138417659	14/01/2024	4/02/2024	5/02/2024	24/05/2024	131	No	28/02/2024	30/07/2024	No	No	Yes	Yes
633.	C240238750747	15/01/2024	5/02/2024	5/02/2024	U	U	Yes	29/02/2024	26/04/2024	No	No	NP	No
634.	C231037656486	15/01/2024	5/02/2024	5/02/2024	5/06/2024	142	Yes	29/02/2024	12/06/2024	No	No	Yes	Yes
635.	C240138417981	15/01/2024	5/02/2024	5/02/2024	21/05/2024	127	Yes	29/02/2024	27/07/2024	No	No	Yes	Yes
636.	C230736373148	16/01/2024	6/02/2024	5/02/2024	15/04/2024	90	Yes	1/03/2024	9/05/2024	No	No	Yes	Yes
637.	C240740012437	22/07/2024	12/08/2024	12/08/2024	23/08/2024	32	Yes	5/09/2024	N/A	Yes	N/A	NP	NP
638.	C240138442540	17/01/2024	7/02/2024	7/02/2024	21/05/2024	125	Yes	2/03/2024	22/07/2024	No	No	Yes	Yes
639.	C240740014615	23/07/2024	13/08/2024	13/08/2024	28/08/2024	36	Yes	6/09/2024	U	Yes	No	NP	NP
640.	C240739969375	16/07/2024	6/08/2024	6/08/2024	29/07/2024	13	Yes	30/08/2024	U	Yes	No	NP	NP
641.	C240138441373	17/01/2024	7/02/2024	7/02/2024	U	U	Yes	2/03/2024	11/06/2024	No	No	NP	No

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642.	C231037707887	17/01/2024	7/02/2024	7/02/2024	15/04/2024	89	Yes	2/03/2024	15/04/2024	No	No	Yes	No
643.	C231238177985	17/01/2024	7/02/2024	7/02/2024	16/04/2024	90	Yes	2/03/2024	16/04/2024	No	No	NP	No
644.	C230937225602	17/01/2024	7/02/2024	7/02/2024	22/03/2024	65	Yes	2/03/2024	2/04/2024	No	No	Yes	Yes
645.	C240740029607	26/07/2024	16/08/2024	23/08/2024	U	U	No	9/09/2024	U	No	No	NP	NP
646.	C240138495287	17/01/2024	7/02/2024	7/02/2024	26/04/2024	100	Yes	2/03/2024	22/07/2024	No	No	Yes	Yes
647.	C240840183503	13/08/2024	3/09/2024	3/09/2024	17/09/2024	35	Yes	27/09/2024	U	Yes	No	NP	NP
648.	C240138442521	17/01/2024	7/02/2024	7/02/2024	5/06/2024	140	Yes	2/03/2024	24/07/2024	No	No	Yes	Yes
649.	C230736531117	20/07/2023	10/08/2023	U	14/05/2024	299	No	3/09/2023	U	No	No	NP	NP
650.	C240138441776	17/01/2024	7/02/2024	7/02/2024	10/05/2024	114	Yes	2/03/2024	19/07/2024	No	No	Yes	Yes
651.	C240138441539	17/01/2024	7/02/2024	7/02/2024	28/06/2024	163	Yes	2/03/2024	12/07/2024	No	No	Yes	Yes
652.	C240138441451	17/01/2024	7/02/2024	7/02/2024	8/06/2024	143	Yes	2/03/2024	24/07/2024	No	No	Yes	NP
653.	C240138441631	17/01/2024	7/02/2024	7/02/2024	22/05/2024	126	Yes	2/03/2024	18/07/2024	No	No	Yes	Yes
654.	C240138441566	17/01/2024	7/02/2024	7/02/2024	27/06/2024	162	Yes	2/03/2024	22/07/2024	No	No	Yes	Yes
655.	C240138446353	18/01/2024	8/02/2024	8/02/2024	13/03/2024	55	Yes	3/03/2024	11/03/2024	No	No	Yes	NP
656.	C240138447423	18/01/2024	8/02/2024	8/02/2024	29/05/2024	132	Yes	3/03/2024	22/07/2024	No	No	Yes	Yes
657.	C231037619703	18/01/2024	8/02/2024	8/02/2024	15/03/2024	57	Yes	3/03/2024	20/03/2024	No	No	Yes	Yes
658.	C240238566296	18/01/2024	8/02/2024	9/02/2024	19/04/2024	92	No	3/03/2024	19/04/2024	No	No	NP	No
659.	C231137883128	18/01/2024	8/02/2024	8/02/2024	22/03/2024	64	Yes	3/03/2024	15/05/2024	No	No	Yes	Yes
660.	C240138444356	18/01/2024	8/02/2024	8/02/2024	22/05/2024	125	Yes	3/03/2024	22/07/2024	No	No	Yes	Yes
661.	C240138446772	18/01/2024	8/02/2024	8/02/2024	22/05/2024	125	Yes	3/03/2024	31/07/2024	No	No	Yes	Yes
662.	C230535933195	11/05/2023	1/06/2023	15/11/2023	6/03/2024	300	No	25/06/2023	U	No	No	No	NP
663.	C240138444474	18/01/2024	8/02/2024	1/03/2024	6/05/2024	109	No	3/03/2024	18/05/2024	No	No	Yes	Yes
664.	C240138444531	18/01/2024	8/02/2024	8/02/2024	21/05/2024	124	Yes	3/03/2024	8/07/2024	No	No	Yes	Yes
665.	C240138446353	18/01/2024	8/02/2024	8/02/2024	13/03/2024	55	Yes	3/03/2024	11/03/2024	No	No	Yes	NP
666.	C240138446601	18/01/2024	8/02/2024	30/07/2024	30/07/2024	194	No	3/03/2024	30/07/2024	No	No	No	Yes

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667.	C240238575239	19/01/2024	9/02/2024	4/03/2024	3/06/2024	136	No	4/03/2024	3/06/2024	No	No	NP	No
668.	C240138468467	19/01/2024	9/02/2024	9/02/2024	26/06/2024	159	Yes	4/03/2024	22/07/2024	No	No	Yes	Yes
669.	C230636086761	6/06/2023	27/06/2023	N/A	27/02/2024	266	N/A	21/07/2023	N/A	No	N/A	Yes	NP
670.	C240138472599	20/01/2024	10/02/2024	9/02/2024	10/05/2024	111	Yes	5/03/2024	22/07/2024	No	No	Yes	No
671.	C240138555035	20/01/2024	10/02/2024	U	22/05/2024	123	No	5/03/2024	19/07/2024	No	No	Yes	Yes
672.	C231037404888	8/10/2023	29/10/2023	U	15/04/2024	190	No	22/11/2023	N/A	No	N/A	NP	NP
673.	C240238629218	21/01/2024	11/02/2024	9/02/2024	21/06/2024	152	Yes	6/03/2024	23/07/2024	No	No	Yes	Yes
674.	C231037652077	22/01/2024	12/02/2024	12/02/2024	6/04/2024	75	Yes	7/03/2024	6/04/2024	No	No	Yes	No
675.	C231037472758	22/01/2024	12/02/2024	12/02/2024	29/05/2024	128	Yes	7/03/2024	19/07/2024	No	No	Yes	Yes
676.	C240138495603	22/01/2024	12/02/2024	12/02/2024	23/05/2024	122	Yes	7/03/2024	19/07/2024	No	No	Yes	Yes
677.	C230736574743	23/07/2023	13/08/2023	29/08/2023	18/10/2023	87	No	6/09/2023	N/A	No	N/A	No	NP
678.	C240138495505	22/01/2024	12/02/2024	12/02/2024	23/05/2024	122	Yes	7/03/2024	19/07/2024	No	No	Yes	Yes
679.	C240238617961	23/01/2024	13/02/2024	13/02/2024	11/04/2024	79	Yes	8/03/2024	12/04/2024	No	No	Yes	Yes
680.	C240138519999	25/01/2024	15/02/2024	15/02/2024	6/04/2024	72	Yes	10/03/2024	6/04/2024	No	No	NP	No
681.	C240138519792	25/01/2024	15/02/2024	13/02/2024	12/07/2024	169	Yes	10/03/2024	13/02/2024	No	Yes	NP	NP
682.	C240138518822	25/01/2024	15/02/2024	15/02/2024	19/04/2024	85	Yes	10/03/2024	7/05/2024	No	No	Yes	NP
683.	C240138519315	25/01/2024	15/02/2024	15/02/2024	10/06/2024	137	Yes	10/03/2024	24/07/2024	No	No	Yes	Yes
684.	C240138520001	25/01/2024	15/02/2024	15/02/2024	3/06/2024	130	Yes	10/03/2024	16/07/2024	No	No	Yes	Yes
685.	C240138518931	25/01/2024	15/02/2024	15/02/2024	1/06/2024	128	Yes	10/03/2024	22/07/2024	No	No	Yes	Yes
686.	C230836899823	23/08/2023	13/09/2023	U	14/03/2024	204	No	7/10/2023	U	No	No	No	NP
687.	C240138523929	27/01/2024	17/02/2024	30/01/2024	29/01/2024	2	Yes	12/03/2024	16/04/2024	Yes	No	NP	No
688.	C240238621136	27/01/2024	17/02/2024	19/02/2024	9/05/2024	103	No	12/03/2024	23/05/2024	No	No	Yes	Yes
689.	C240339018306	29/01/2024	19/02/2024	19/02/2024	3/06/2024	126	Yes	14/03/2024	24/07/2024	No	No	Yes	NP
690.	C240138565857	30/01/2024	20/02/2024	23/02/2024	6/04/2024	67	No	15/03/2024	6/04/2024	No	No	NP	No
691.	C240138555291	30/01/2024	20/02/2024	20/02/2024	6/04/2024	67	Yes	15/03/2024	6/04/2024	No	No	NP	No

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692.	C240238614878	30/01/2024	20/02/2024	20/02/2024	4/04/2024	65	Yes	15/03/2024	14/05/2024	No	No	Yes	Yes
693.	C230937211780	20/09/2023	11/10/2023	N/A	19/03/2024	181	N/A	4/11/2023	N/A	No	N/A	Yes	NP
694.	C240238786540	30/01/2024	20/02/2024	20/02/2024	23/04/2024	84	Yes	15/03/2024	14/03/2024	No	Yes	Yes	NP
695.	C240138555142	30/01/2024	20/02/2024	20/02/2024	11/04/2024	72	Yes	15/03/2024	23/07/2024	No	No	Yes	Yes
696.	C240138556929	30/01/2024	20/02/2024	20/02/2024	23/05/2024	114	Yes	15/03/2024	22/07/2024	No	No	Yes	Yes
697.	C240138558801	30/01/2024	20/02/2024	20/02/2024	21/05/2024	112	Yes	15/03/2024	18/07/2024	No	No	Yes	Yes
698.	C240138556954	30/01/2024	20/02/2024	21/02/2024	22/06/2024	144	No	15/03/2024	30/07/2024	No	No	Yes	Yes
699.	C230636299126	25/06/2023	16/07/2023	U	21/02/2024	241	No	9/08/2023	U	No	No	NP	NP
700.	C240138556950	30/01/2024	20/02/2024	20/02/2024	29/04/2024	90	Yes	15/03/2024	23/07/2024	No	No	Yes	Yes
701.	C240238574436	30/01/2024	20/02/2024	23/02/2024	27/05/2024	118	No	15/03/2024	8/07/2024	No	No	Yes	Yes
702.	C240338919555	30/01/2024	20/02/2024	25/04/2024	18/04/2024	79	No	15/03/2024	10/05/2024	No	No	Yes	NP
703.	C220933493039	28/09/2022	19/10/2022	N/A	27/01/2023	121	N/A	12/11/2022	U	No	No	No	NP
704.	C221234183787	6/12/2022	27/12/2022	N/A	27/03/2023	111	N/A	20/01/2023	U	No	No	No	NP
705.	C240138565876	31/01/2024	21/02/2024	15/03/2024	22/03/2024	51	No	16/03/2024	9/05/2024	No	No	Yes	Yes
706.	C240138561885	31/01/2024	21/02/2024	21/02/2024	11/06/2024	132	Yes	16/03/2024	11/06/2024	No	No	NP	No
707.	C240238785162	31/01/2024	21/02/2024	23/02/2024	8/04/2024	68	No	16/03/2024	22/07/2024	No	No	Yes	NP
708.	C230937056376	31/01/2024	21/02/2024	23/02/2024	21/03/2024	50	No	16/03/2024	22/03/2024	No	No	Yes	Yes
709.	C231238128282	31/01/2024	21/02/2024	23/02/2024	26/04/2024	86	No	16/03/2024	13/06/2024	No	No	Yes	Yes
710.	C230636323491	28/06/2023	19/07/2023	U	11/06/2024	349	No	12/08/2023	U	No	No	NP	NP
711.	C240238565938	31/01/2024	21/02/2024	23/02/2024	30/05/2024	120	No	16/03/2024	30/07/2024	No	No	Yes	Yes
712.	C240138565876	31/01/2024	21/02/2024	15/03/2024	22/03/2024	51	No	16/03/2024	9/05/2024	No	No	Yes	Yes
713.	C240238566724	1/02/2024	22/02/2024	23/02/2024	21/03/2024	49	No	17/03/2024	22/03/2024	No	No	Yes	Yes
714.	C240238780853	1/02/2024	22/02/2024	23/02/2024	18/03/2024	46	No	17/03/2024	19/03/2024	No	No	Yes	Yes
715.	C240138334437	1/02/2024	22/02/2024	23/02/2024	11/04/2024	70	No	17/03/2024	13/05/2024	No	No	NP	Yes
716.	C230535804799	10/05/2023	31/05/2023	U	N/A	N/A	No	24/06/2023	N/A	N/A	N/A	NP	NP

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717.	C230636318498	21/06/2023	12/07/2023	U	17/01/2024	210	No	5/08/2023	U	No	No	No	NP
718.	C231037365657	1/02/2024	22/02/2024	1/04/2024	5/04/2024	64	No	17/03/2024	2/05/2024	No	No	Yes	Yes
719.	C221033664190	19/10/2022	9/11/2022	N/A	28/03/2023	160	No	3/12/2022	N/A	No	N/A	No	NP
720.	C220732609099	9/07/2022	30/07/2022	N/A	23/09/2022	76	No	23/08/2022	N/A	No	N/A	No	NP
721.	C230234940062	18/02/2023	11/03/2023	20/04/2023	26/04/2023	67	No	4/04/2023	N/A	No	N/A	No	NP
722.	C230335101883	9/03/2023	30/03/2023	15/05/2023	30/05/2023	82	No	23/04/2023	N/A	No	N/A	No	NP
723.	C240238566549	1/02/2024	22/02/2024	23/02/2024	3/06/2024	123	No	17/03/2024	24/07/2024	No	No	Yes	NP
724.	C240238566496	1/02/2024	22/02/2024	U	9/04/2024	68	No	17/03/2024	26/07/2024	No	No	Yes	No
725.	C230536034232	2/02/2024	23/02/2024	23/02/2024	1/04/2024	59	Yes	18/03/2024	27/05/2024	No	No	Yes	Yes
726.	C231037375180	2/02/2024	23/02/2024	23/02/2024	7/06/2024	126	Yes	18/03/2024	11/07/2024	No	No	Yes	NP
727.	C240138557627	2/02/2024	23/02/2024	23/02/2024	27/03/2024	54	Yes	18/03/2024	27/03/2024	No	No	Yes	Yes
728.	C231138014700	6/08/2023	27/08/2023	U	U	U	No	20/09/2023	U	No	No	NP	NP
729.	C240138442951	2/02/2024	23/02/2024	1/03/2024	22/02/2024	20	No	18/03/2024	1/03/2024	Yes	Yes	NP	NP
730.	C230636319276	27/06/2023	18/07/2023	N/A	29/02/2024	247	No	11/08/2023	U	No	No	Yes	NP
731.	C231037590750	18/10/2023	8/11/2023	N/A	6/12/2023	49	No	2/12/2023	U	No	No	Yes	NP
732.	C231137796998	2/02/2024	23/02/2024	23/02/2024	9/04/2024	67	Yes	18/03/2024	7/06/2024	No	No	Yes	NP
733.	C230836701517	9/08/2023	30/08/2023	U	22/03/2024	226	No	23/09/2023	U	No	No	No	NP
734.	C240238614303	2/02/2024	23/02/2024	5/03/2024	9/06/2024	128	No	18/03/2024	30/07/2024	No	No	Yes	Yes
735.	C240339018366	3/02/2024	24/02/2024	23/02/2024	18/06/2024	136	Yes	19/03/2024	18/06/2024	No	No	NP	No
736.	C240238578308	3/02/2024	24/02/2024	23/02/2024	7/06/2024	125	Yes	19/03/2024	22/07/2024	No	No	Yes	Yes
737.	C240238578342	3/02/2024	24/02/2024	23/02/2024	30/04/2024	87	Yes	19/03/2024	19/07/2024	No	No	Yes	Yes
738.	C240238579147	3/02/2024	24/02/2024	23/02/2024	12/06/2024	130	Yes	19/03/2024	9/07/2024	No	No	Yes	NP
739.	C231137976319	23/11/2023	14/12/2023	27/12/2023	22/05/2024	181	No	7/01/2024	U	No	No	Yes	NP
740.	C220833011311	18/08/2022	8/09/2022	U	31/10/2022	74	No	2/10/2022	U	No	No	No	NP
741.	C221033548748	10/10/2022	31/10/2022	N/A	21/03/2023	162	No	24/11/2022	N/A	No	N/A	No	NP

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742.	C220532029846	22/03/2022	12/04/2022	1/06/2022	1/07/2022	101	No	6/05/2022	U	No	
743.	C240238577461	3/02/2024	24/02/2024	23/02/2024	13/08/2024	192	Yes	19/03/2024	13/08/2024	No	
744.	C240238579118	3/02/2024	24/02/2024	23/02/2024	19/06/2024	137	Yes	19/03/2024	22/07/2024	No	
745.	C240238579154	3/02/2024	24/02/2024	12/06/2024	15/05/2024	102	No	19/03/2024	12/06/2024	No	
746.	C240238578296	3/02/2024	24/02/2024	24/07/2024	U	U	No	19/03/2024	24/07/2024	No	
747.	C240238579152	3/02/2024	24/02/2024	27/06/2024	U	U	No	19/03/2024	27/06/2024	No	
748.	C240238613955	4/02/2024	25/02/2024	23/02/2024	20/06/2024	137	Yes	20/03/2024	20/06/2024	No	
749.	C230937310133	4/02/2024	25/02/2024	23/02/2024	9/04/2024	65	Yes	20/03/2024	30/05/2024	No	
750.	C240238613934	4/02/2024	25/02/2024	23/02/2024	1/06/2024	118	Yes	20/03/2024	16/07/2024	No	
751.	C220832915421	10/08/2022	31/08/2022	N/A	11/10/2022	62	No	24/09/2022	U	No	
752.	C220933363850	19/09/2022	10/10/2022	U	U	U	No	3/11/2022	U	No	
753.	C220331310585	29/03/2022	19/04/2022	U	13/05/2022	45	No	13/05/2022	13/05/2022	Yes	
754.	C220431382727	6/04/2022	27/04/2022	22/04/2022	28/04/2022	22	Yes	21/05/2022	28/04/2022	Yes	
755.	C220331107406	10/03/2022	31/03/2022	4/04/2022	U	U	No	24/04/2022	11/04/2022	No	
756.	C221033613248	14/10/2022	4/11/2022	18/01/2023	25/01/2023	103	No	28/11/2022	24/01/2023	No	
757.	C221033778713	26/10/2022	16/11/2022	23/01/2023	24/01/2023	90	No	10/12/2022	24/01/2023	No	
758.	C220732681284	16/07/2022	6/08/2022	U	2/09/2022	48	No	30/08/2022	1/09/2022	No	
759.	C220732770981	21/07/2022	11/08/2022	U	5/09/2022	46	No	4/09/2022	5/09/2022	No	
760.	C220431501805	13/04/2022	4/05/2022	21/04/2022	2/05/2022	19	Yes	28/05/2022	U	Yes	ľ
761.	C240238613950	4/02/2024	25/02/2024	23/02/2024	5/06/2024	122	Yes	20/03/2024	22/07/2024	No	

N/A

24/01/2023

4/04/2022

19/07/2022

U

N/A

108

11

35

U

N/A

No

Yes

No

No

24/04/2023

22/11/2022

8/05/2022

29/07/2022

18/04/2022

N/A

24/01/2023

1/04/2022

19/07/2022

6/04/2022

N/A

No

Yes

Yes

No

762.

763.

764.

765.

766.

C230335115263

C221033546916

C220331273798

C220632266520

C220431359132

10/03/2023

8/10/2022

24/03/2022

14/06/2022

4/03/2022

31/03/2023

29/10/2022

14/04/2022

5/07/2022

25/03/2022

N/A

N/A

N/A

18/07/2022

5/04/2022

(k) Did HBAU advise Investigation Outcome within 45 days (Yes/No)	(I) Did HBAU refer to Liability Rules in completing its Investigation (Yes/No)	(m) Did HBAU refer to Liability Rules in its Investigation Outcome (Yes/No)
No	No	NP
No	No	Yes
No	Yes	Yes
No	Yes	Yes
No	Yes	NP
No	NP	No
No	NP	No
No	Yes	NP
No	Yes	Yes
No	No	NP
No	No	NP
Yes	No	No*
Yes	No	No
Yes	NP	No*
No	No	No
No	Yes	Yes
N/A	NP	NP
No	No	No*
Yes	No	No*
Yes	No	No*
Yes	NP	No*

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767.	C240238611499	4/02/2024	25/02/2024	23/02/2024	28/06/2024	145	Yes	20/03/2024	26/07/2024	No	No	Yes	NP
768.	C220431386128	7/04/2022	28/04/2022	U	20/05/2022	43	No	22/05/2022	20/05/2022	Yes	Yes	No	No*
769.	C220331013533	3/03/2022	24/03/2022	N/A	22/03/2022	19	Yes	17/04/2022	22/03/2022	Yes	Yes	No	No*
770.	C220230622082	2/02/2022	23/02/2022	N/A	17/02/2022	15	Yes	19/03/2022	17/02/2022	Yes	Yes	No	No*
771.	C220732809840	29/07/2022	19/08/2022	U	19/09/2022	52	No	12/09/2022	19/09/2022	No	No	No	No*
772.	C220933431821	21/09/2022	12/10/2022	N/A	25/11/2022	65	No	5/11/2022	25/11/2022	No	No	No	No
773.	C220130529533	19/01/2022	9/02/2022	7/02/2022	17/02/2022	29	Yes	5/03/2022	17/02/2022	Yes	Yes	No	No*
774.	C220431346466	4/04/2022	25/04/2022	4/05/2022	11/05/2022	37	No	19/05/2022	11/05/2022	Yes	Yes	No	No*
775.	C220130582954	27/01/2022	17/02/2022	U	22/02/2022	26	No	13/03/2022	21/02/2022	Yes	Yes	No	No*
776.	C220732785376	26/07/2022	16/08/2022	23/08/2022	5/09/2022	41	No	9/09/2022	5/09/2022	Yes	Yes	No	No*
777.	C220130553737	21/01/2022	11/02/2022	N/A	7/02/2022	17	Yes	7/03/2022	7/02/2022	Yes	Yes	No	No*
778.	C240238614205	4/02/2024	25/02/2024	22/07/2024	1/06/2024	118	No	20/03/2024	22/07/2024	No	No	Yes	Yes
779.	C240138513003	5/02/2024	26/02/2024	26/02/2024	5/06/2024	121	Yes	21/03/2024	22/07/2024	No	No	Yes	NP
780.	C231238096058	5/02/2024	26/02/2024	26/02/2024	23/04/2024	78	Yes	21/03/2024	10/05/2024	No	No	Yes	Yes
781.	C230836761531	5/02/2024	26/02/2024	26/02/2024	31/07/2024	177	Yes	21/03/2024	31/07/2024	No	No	No	Yes
782.	C240238578372	5/02/2024	26/02/2024	26/02/2024	5/06/2024	121	Yes	21/03/2024	22/07/2024	No	No	Yes	Yes
783.	C240238614295	5/02/2024	26/02/2024	26/02/2024	2/04/2024	57	Yes	21/03/2024	29/05/2024	No	No	Yes	NP
784.	C221133844636	1/11/2022	22/11/2022	N/A	23/01/2023	83	Yes	16/12/2022	8/11/2022	No	Yes	No	No*
785.	C220833085677	25/08/2022	15/09/2022	U	12/10/2022	48	No	9/10/2022	12/10/2022	No	No	No	No*
786.	C230134714169	28/01/2023	18/02/2023	N/A	31/03/2023	62	N/A	14/03/2023	N/A	No	N/A	No	NP
787.	C230234905892	16/02/2023	9/03/2023	N/A	31/03/2023	43	N/A	2/04/2023	U	Yes	No	No	NP
788.	C230234784286	7/02/2023	28/02/2023	N/A	12/04/2023	64	N/A	24/03/2023	U	No	No	No	NP
789.	C230435394993	4/04/2023	25/04/2023	N/A	3/07/2023	90	N/A	19/05/2023	U	No	No	No	NP
790.	C230134673468	23/01/2023	13/02/2023	N/A	31/03/2023	67	N/A	9/03/2023	U	No	No	No	NP
791.	C230435613413	18/04/2023	9/05/2023	10/11/2023	15/11/2023	211	No	2/06/2023	N/A	No	N/A	No	NP

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792.	C240238615062	5/02/2024	26/02/2024	26/02/2024	24/05/2024	109	Yes	21/03/2024	23/07/2024	No	No	Yes	Yes
793.	C230435628689	19/04/2023	10/05/2023	10/11/2023	14/11/2023	209	No	3/06/2023	U	No	No	No	NP
794.	C240238615277	5/02/2024	26/02/2024	26/02/2024	23/05/2024	108	Yes	21/03/2024	19/07/2024	No	No	Yes	Yes
795.	C230937222425	6/02/2024	27/02/2024	27/02/2024	9/04/2024	63	Yes	22/03/2024	2/05/2024	No	No	Yes	Yes
796.	C230736501725	17/07/2023	7/08/2023	U	U	U	No	31/08/2023	U	No	No	NP	NP
797.	C230636086047	6/06/2023	27/06/2023	U	13/05/2024	342	No	21/07/2023	N/A	No	N/A	NP	NP
798.	C231037366441	6/02/2024	27/02/2024	27/02/2024	29/04/2024	83	Yes	22/03/2024	11/06/2024	No	No	Yes	Yes
799.	C231137883323	6/02/2024	27/02/2024	28/02/2024	12/04/2024	66	No	22/03/2024	22/03/2024	No	Yes	Yes	Yes
800.	C230836687619	8/08/2023	29/08/2023	U	U	U	No	22/09/2023	U	No	No	NP	NP
801.	C230937237080	6/02/2024	27/02/2024	27/02/2024	25/04/2024	79	Yes	22/03/2024	10/05/2024	No	No	Yes	Yes
802.	C220833065444	23/08/2022	13/09/2022	U	15/11/2022	84	No	7/10/2022	U	No	No	No	NP
803.	C230736613994	31/07/2023	21/08/2023	U	U	U	No	14/09/2023	U	No	No	NP	NP
804.	C240138284533	5/01/2024	26/01/2024	N/A	9/07/2024	186	N/A	19/02/2024	N/A	No	N/A	No	NP
805.	C230937173896	6/02/2024	27/02/2024	27/02/2024	5/06/2024	120	Yes	22/03/2024	22/07/2024	No	No	Yes	Yes
806.	C240238618057	6/02/2024	27/02/2024	27/02/2024	U	U	Yes	22/03/2024	10/05/2024	No	No	NP	No
807.	C240238621392	7/02/2024	28/02/2024	28/02/2024	1/06/2024	115	Yes	23/03/2024	3/07/2024	No	No	Yes	Yes
808.	C240238621549	7/02/2024	28/02/2024	28/02/2024	29/04/2024	82	Yes	23/03/2024	15/07/2024	No	No	Yes	Yes
809.	C240238621466	7/02/2024	28/02/2024	28/02/2024	7/05/2024	90	Yes	23/03/2024	10/05/2024	No	No	Yes	Yes
810.	C240238621808	7/02/2024	28/02/2024	6/06/2024	6/06/2024	120	No	23/03/2024	6/06/2024	No	No	NP	No
811.	C230937074743	9/02/2024	1/03/2024	1/03/2024	6/04/2024	57	Yes	25/03/2024	25/03/2024	No	Yes	NP	NP
812.	C240338876809	10/02/2024	2/03/2024	1/03/2024	6/05/2024	86	Yes	26/03/2024	18/05/2024	No	No	Yes	Yes
813.	C240238652791	10/02/2024	2/03/2024	1/03/2024	9/06/2024	120	Yes	26/03/2024	22/07/2024	No	No	Yes	Yes
814.	C240539382696	10/02/2024	2/03/2024	9/08/2024	9/08/2024	181	No	26/03/2024	9/08/2024	No	No	No	NP
815.	C240238663850	12/02/2024	4/03/2024	4/03/2024	23/05/2024	101	Yes	28/03/2024	30/07/2024	No	No	Yes	Yes
816.	C240238665048	12/02/2024	4/03/2024	19/04/2024	19/04/2024	67	No	28/03/2024	13/05/2024	No	No	Yes	NP

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817.	C240238665196	13/02/2024	5/03/2024	5/03/2024	4/06/2024	112	Yes	29/03/2024	17/07/2024	No	No	Yes	Yes
818.	C240238665162	13/02/2024	5/03/2024	5/03/2024	16/06/2024	124	Yes	29/03/2024	22/07/2024	No	No	Yes	Yes
819.	C240238665087	13/02/2024	5/03/2024	5/03/2024	23/05/2024	100	Yes	29/03/2024	11/06/2024	No	No	Yes	Yes
820.	C240238665468	13/02/2024	5/03/2024	5/03/2024	14/05/2024	91	Yes	29/03/2024	15/05/2024	No	No	Yes	Yes
821.	C240238769879	14/02/2024	6/03/2024	28/03/2024	6/06/2024	113	No	30/03/2024	6/06/2024	No	No	NP	No
822.	C240238684791	14/02/2024	6/03/2024	6/03/2024	7/05/2024	83	Yes	30/03/2024	4/07/2024	No	No	Yes	Yes
823.	C240238685211	14/02/2024	6/03/2024	6/03/2024	21/06/2024	128	Yes	30/03/2024	23/07/2024	No	No	Yes	Yes
824.	C240238689810	14/02/2024	6/03/2024	6/03/2024	7/06/2024	114	Yes	30/03/2024	5/07/2024	No	No	Yes	Yes
825.	C240238685203	14/02/2024	6/03/2024	6/03/2024	29/03/2024	44	Yes	30/03/2024	30/07/2024	Yes	No	Yes	Yes
826.	C240238683957	14/02/2024	6/03/2024	6/03/2024	22/05/2024	98	Yes	30/03/2024	4/07/2024	No	No	Yes	Yes
827.	C240238685569	14/02/2024	6/03/2024	6/03/2024	8/06/2024	115	Yes	30/03/2024	6/04/2024	No	No	NP	Yes
828.	C240138552445	15/02/2024	7/03/2024	6/03/2024	20/04/2024	65	Yes	31/03/2024	18/05/2024	No	No	Yes	Yes
829.	C240238692064	15/02/2024	7/03/2024	6/03/2024	26/07/2024	162	Yes	31/03/2024	26/07/2024	No	No	Yes	Yes
830.	C240238695241	15/02/2024	7/03/2024	28/03/2024	2/06/2024	108	No	31/03/2024	22/07/2024	No	No	Yes	Yes
831.	C240238692310	15/02/2024	7/03/2024	28/03/2024	18/06/2024	124	No	31/03/2024	30/07/2024	No	No	Yes	Yes
832.	C240238695151	15/02/2024	7/03/2024	28/03/2024	2/05/2024	77	No	31/03/2024	28/05/2024	No	No	NP	NP
833.	C231137889412	16/02/2024	8/03/2024	1/04/2024	10/06/2024	115	No	1/04/2024	27/08/2024	No	No	Yes	Yes
834.	C230937288788	16/02/2024	8/03/2024	1/04/2024	5/04/2024	49	No	1/04/2024	1/04/2024	No	Yes	Yes	NP
835.	C240138494864	16/02/2024	8/03/2024	7/03/2024	24/05/2024	98	Yes	1/04/2024	19/07/2024	No	No	Yes	Yes
836.	C240238717607	16/02/2024	8/03/2024	7/03/2024	27/06/2024	132	Yes	1/04/2024	22/07/2024	No	No	Yes	Yes
837.	C240238717311	16/02/2024	8/03/2024	7/03/2024	18/06/2024	123	Yes	1/04/2024	23/07/2024	No	No	Yes	Yes
838.	C240238730626	17/02/2024	9/03/2024	7/03/2024	4/06/2024	108	Yes	2/04/2024	3/07/2024	No	No	Yes	NP
839.	C240138445790	18/02/2024	10/03/2024	8/03/2024	22/03/2024	33	Yes	3/04/2024	26/04/2024	Yes	No	Yes	No
840.	C230937221995	18/02/2024	10/03/2024	8/03/2024	8/06/2024	111	Yes	3/04/2024	22/07/2024	No	No	NP	NP
841.	C240238739856	18/02/2024	10/03/2024	11/03/2024	9/06/2024	112	No	3/04/2024	16/07/2024	No	No	Yes	Yes

Row	(a) UCM reference	(b) Date HBAU received UAR	(c) Date HBAU required to either complete Investigation/ or advise Investigation Outcome (21 days)	(d) Date of Extra Time Request (where made)	(e) Date HBAU completed its Investigation	(f) Number of days taken to complete Investigation	(g) Did HBAU make Extra Time Request or complete Investigation within 21 days (Yes/No)	(h) Date HBAU required to complete Investigation (45 days) where applicable	(i) Date HBAU advised Investigation Outcome	(j) Did HBAU complete Investigation within 45 days (Yes/No)
842.	C230134703504	19/02/2024	11/03/2024	12/03/2024	6/05/2024	77	No	4/04/2024	10/05/2024	No
843.	C240138441909	19/02/2024	11/03/2024	11/03/2024	10/05/2024	81	Yes	4/04/2024	22/07/2024	No
844.	C221134119952	28/11/2022	19/12/2022	20/01/2023	31/01/2023	64	No	12/01/2023	20/01/2023	No
845.	C221033547253	8/10/2022	29/10/2022	N/A	31/01/2023	115	N/A	22/11/2022	U	No
846.	C220833125951	30/08/2022	20/09/2022	N/A	31/01/2023	154	No	14/10/2022	8/11/2022	No
847.	C220732503629	6/07/2022	27/07/2022	N/A	15/07/2022	9	Yes	20/08/2022	U	Yes
848.	C221134007162	16/11/2022	7/12/2022	N/A	31/01/2023	76	No	31/12/2022	17/01/2023	No
849.	C240238740150	19/02/2024	11/03/2024	11/03/2024	31/05/2024	102	Yes	4/04/2024	22/07/2024	No
850.	C240238748481	19/02/2024	11/03/2024	12/03/2024	8/06/2024	110	No	4/04/2024	22/07/2024	No
851.	C240238753166	20/02/2024	12/03/2024	12/03/2024	2/06/2024	103	Yes	5/04/2024	24/07/2024	No
852.	C231137944806	21/02/2024	13/03/2024	13/03/2024	26/03/2024	34	Yes	6/04/2024	26/03/2024	Yes
853.	C240238768459	21/02/2024	13/03/2024	13/03/2024	26/05/2024	95	Yes	6/04/2024	29/07/2024	No
854.	C240840048761	22/02/2024	14/03/2024	N/A	29/07/2024	158	No	7/04/2024	20/08/2024	No
855.	C240238572803	23/02/2024	15/03/2024	14/03/2024	28/03/2024	34	Yes	8/04/2024	28/03/2024	Yes
856.	C240238784583	23/02/2024	15/03/2024	14/03/2024	27/03/2024	33	Yes	8/04/2024	26/03/2024	Yes
857.	C240238787869	23/02/2024	15/03/2024	25/03/2024	14/05/2024	81	No	8/04/2024	22/07/2024	No
858.	C240238781089	23/02/2024	15/03/2024	N/A	27/03/2024	33	No	8/04/2024	28/03/2024	Yes
859.	C240238787869	23/02/2024	15/03/2024	25/03/2024	14/05/2024	81	No	8/04/2024	22/07/2024	No
860.	C240238784616	24/02/2024	16/03/2024	14/03/2024	7/05/2024	73	Yes	9/04/2024	7/05/2024	No
861.	C240238576567	24/02/2024	16/03/2024	14/03/2024	15/05/2024	81	Yes	9/04/2024	9/04/2024	No
862.	C240238785796	24/02/2024	16/03/2024	18/03/2024	19/07/2024	146	No	9/04/2024	31/07/2024	No
863.	C240539404039	26/02/2024	18/03/2024	28/05/2024	12/07/2024	137	No	11/04/2024	6/08/2024	No
864.	C240138376271	26/02/2024	18/03/2024	19/03/2024	26/03/2024	29	No	11/04/2024	27/03/2024	Yes
865.	C230937298729	26/02/2024	18/03/2024	18/03/2024	6/06/2024	101	Yes	11/04/2024	6/06/2024	No

866.

C240339080514

26/02/2024

18/03/2024

18/03/2024

31

Yes

11/04/2024

28/03/2024

28/03/2024

on ys	(k) Did HBAU advise Investigation Outcome within 45 days (Yes/No)	(I) Did HBAU refer to Liability Rules in completing its Investigation (Yes/No)	(m) Did HBAU refer to Liability Rules in its Investigation Outcome (Yes/No)		
	No	Yes	Yes		
	No	Yes	Yes		
	No	No	No*		
	No	No	NP		
	No	No	No*		
	No	No	NP		
	No	No	No*		
	No	Yes	NP		
	No	Yes	NP		
	No	Yes	Yes		
	Yes	Yes	No		
	No	NP	Yes		
	No	Yes	Yes		
	Yes	No	NP		
	Yes	Yes	No		
	No	Yes	Yes		
	Yes	No	No		
	No	Yes	Yes		
	No	NP	No		
	Yes	Yes	Yes		
	No	Yes	Yes		
	No	No	No		
	Yes	Yes	NP		
	No	NP	No		
	Yes	No	No		

Yes

Row	(a) UCM reference	(b) Date HBAU received UAR	(c) Date HBAU required to either complete Investigation/ or advise Investigation Outcome (21 days)	(d) Date of Extra Time Request (where made)	(e) Date HBAU completed its Investigation	(f) Number of days taken to complete Investigation	(g) Did HBAU make Extra Time Request or complete Investigation within 21 days (Yes/No)	(h) Date HBAU required to complete Investigation (45 days) where applicable	(i) Date HBAU advised Investigation Outcome	(j) Did HBAU complete Investigation within 45 days (Yes/No)	(k) Did HBAU advise Investigation Outcome within 45 days (Yes/No)	(I) Did HBAU refer to Liability Rules in completing its Investigation (Yes/No)	(m) Did HBAU refer to Liability Rules in its Investigation Outcome (Yes/No)
867.	C240238791211	27/02/2024	19/03/2024	19/03/2024	6/04/2024	39	Yes	12/04/2024	19/04/2024	Yes	No	Yes	NP
868.	C240238802802	27/02/2024	19/03/2024	20/03/2024	31/05/2024	94	No	12/04/2024	30/07/2024	No	No	Yes	Yes
869.	C240238616810	28/02/2024	20/03/2024	20/03/2024	17/04/2024	49	Yes	13/04/2024	10/04/2024	No	Yes	Yes	NP
870.	C231037618597	28/02/2024	20/03/2024	20/03/2024	3/05/2024	65	Yes	13/04/2024	16/05/2024	No	No	Yes	Yes
871.	C240238802722	28/02/2024	20/03/2024	20/03/2024	U	U	Yes	13/04/2024	10/04/2024	No	Yes	NP	No
872.	C240539584921	29/02/2024	21/03/2024	U	24/06/2024	116	No	14/04/2024	16/07/2024	No	No	Yes	Yes
873.	C240338811691	1/03/2024	22/03/2024	21/03/2024	U	U	Yes	15/04/2024	15/04/2024	No	Yes	NP	NP
874.	C240338811068	1/03/2024	22/03/2024	21/03/2024	25/03/2024	24	Yes	15/04/2024	4/04/2024	Yes	Yes	No	Yes
875.	C240338858513	6/03/2024	27/03/2024	26/03/2024	2/06/2024	88	Yes	20/04/2024	25/07/2024	No	No	Yes	Yes
876.	C240338864804	8/03/2024	29/03/2024	27/03/2024	28/03/2024	20	Yes	22/04/2024	8/05/2024	Yes	No	Yes	Yes
877.	C231137758704	9/03/2024	30/03/2024	26/03/2024	26/03/2024	17	Yes	23/04/2024	2/05/2024	Yes	No	Yes	NP
878.	C231037366899	9/03/2024	30/03/2024	28/03/2024	2/04/2024	24	Yes	23/04/2024	2/04/2024	Yes	Yes	No	No
879.	C240338909878	12/03/2024	2/04/2024	2/04/2024	22/05/2024	71	Yes	26/04/2024	22/05/2024	No	No	NP	No
880.	C240339025130	19/03/2024	9/04/2024	10/04/2024	5/06/2024	78	No	3/05/2024	3/05/2024	No	Yes	NP	NP
881.	C240339014001	19/03/2024	9/04/2024	N/A	25/03/2024	6	Yes	3/05/2024	25/03/2024	Yes	Yes	No	NP
882.	C231037336840	20/03/2024	10/04/2024	10/04/2024	27/03/2024	7	Yes	4/05/2024	10/05/2024	Yes	No	Yes	Yes
883.	C240339031092	20/03/2024	10/04/2024	10/04/2024	2/06/2024	74	Yes	4/05/2024	22/07/2024	No	No	Yes	Yes
884.	C240339039025	22/03/2024	12/04/2024	N/A	5/04/2024	14	No	6/05/2024	16/04/2024	Yes	Yes	Yes	Yes
885.	C240339038666	22/03/2024	12/04/2024	10/04/2024	8/04/2024	17	Yes	6/05/2024	10/04/2024	Yes	Yes	No	Yes
886.	C240339047945	23/03/2024	13/04/2024	26/07/2024	26/07/2024	125	No	7/05/2024	26/07/2024	No	No	No	NP
887.	C240339067974	26/03/2024	16/04/2024	25/04/2024	5/06/2024	71	No	10/05/2024	17/05/2024	No	No	No	NP
888.	C240339068591	26/03/2024	16/04/2024	13/05/2024	18/04/2024	23	No	10/05/2024	23/07/2024	Yes	No	Yes	Yes
889.	C240339072046	27/03/2024	17/04/2024	16/04/2024	29/04/2024	33	Yes	11/05/2024	29/04/2024	Yes	Yes	NP	No
890.	C240339071881	27/03/2024	17/04/2024	16/04/2024	29/04/2024	33	Yes	11/05/2024	29/04/2024	Yes	Yes	NP	No
891.	C240439112124	27/03/2024	17/04/2024	25/04/2024	19/06/2024	84	No	11/05/2024	4/09/2024	No	No	No	NP

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892.	C240339072316	27/03/2024	17/04/2024	N/A	10/04/2024	14	Yes	11/05/2024	9/04/2024	Yes	Yes	No	Yes
893.	C240238739865	28/03/2024	18/04/2024	25/04/2024	31/07/2024	125	No	12/05/2024	31/07/2024	No	No	No	Yes
894.	C240339077695	28/03/2024	18/04/2024	18/04/2024	26/07/2024	120	Yes	12/05/2024	26/07/2024	No	No	No	Yes
895.	C220833128859	26/09/2022	17/10/2022	N/A	19/12/2022	84	No	10/11/2022	19/12/2022	No	No	No	No
896.	C231037613270	29/03/2024	19/04/2024	25/04/2024	9/05/2024	41	No	13/05/2024	29/05/2024	Yes	No	Yes	No
897.	C240439095458	2/04/2024	23/04/2024	23/04/2024	10/07/2024	99	Yes	17/05/2024	26/07/2024	No	No	Yes	NP
898.	C240439099100	2/04/2024	23/04/2024	23/04/2024	13/06/2024	72	Yes	17/05/2024	9/09/2024	No	No	Yes	Yes
899.	C240439151201	5/04/2024	26/04/2024	29/04/2024	13/05/2024	38	No	20/05/2024	13/05/2024	Yes	Yes	Yes	Yes
900.	C240439172491	10/04/2024	1/05/2024	1/05/2024	18/04/2024	8	Yes	25/05/2024	14/06/2024	Yes	No	Yes	NP
901.	C240439236480	14/04/2024	5/05/2024	3/05/2024	28/05/2024	44	Yes	29/05/2024	12/06/2024	Yes	No	Yes	NP
902.	C240439273466	17/04/2024	8/05/2024	8/05/2024	U	U	Yes	1/06/2024	24/07/2024	No	No	Yes	NP
903.	C240439247677	17/04/2024	8/05/2024	7/05/2024	U	U	Yes	1/06/2024	31/05/2024	No	Yes	NP	NP
904.	C240439291371	19/04/2024	10/05/2024	10/05/2024	15/07/2024	87	Yes	3/06/2024	10/09/2024	No	No	No	NP
905.	C240439358048	26/04/2024	17/05/2024	17/05/2024	21/05/2024	25	Yes	10/06/2024	26/07/2024	Yes	No	Yes	NP
906.	C240439371594	30/04/2024	21/05/2024	21/05/2024	18/06/2024	49	Yes	14/06/2024	26/07/2024	No	No	Yes	Yes
907.	C240539424513	8/05/2024	29/05/2024	17/05/2024	17/05/2024	9	Yes	22/06/2024	17/05/2024	Yes	Yes	NP	No
908.	C240539449597	11/05/2024	1/06/2024	1/06/2024	4/06/2024	24	Yes	25/06/2024	26/07/2024	Yes	No	No	NP
909.	C240539495756	15/05/2024	5/06/2024	5/06/2024	30/07/2024	76	Yes	29/06/2024	30/07/2024	No	No	Yes	NP
910.	C240539520284	18/05/2024	8/06/2024	5/08/2024	7/08/2024	81	No	2/07/2024	8/08/2024	No	No	No	Yes
911.	C240539559400	23/05/2024	13/06/2024	13/06/2024	20/08/2024	89	Yes	7/07/2024	20/08/2024	No	No	No	NP
912.	C240539573807	27/05/2024	17/06/2024	17/06/2024	20/06/2024	24	Yes	11/07/2024	23/07/2024	Yes	No	Yes	Yes
913.	C240539576008	27/05/2024	17/06/2024	17/06/2024	26/06/2024	30	Yes	11/07/2024	24/07/2024	Yes	No	Yes	Yes
914.	C240539581949	29/05/2024	19/06/2024	U	31/05/2024	2	No	13/07/2024	25/07/2024	Yes	No	Yes	Yes
915.	C240639819586	29/05/2024	19/06/2024	N/A	31/05/2024	2	No	13/07/2024	25/07/2024	Yes	No	Yes	NP
916.	C240639608253	4/06/2024	25/06/2024	26/07/2024	16/07/2024	42	No	19/07/2024	26/07/2024	Yes	No	Yes	Yes

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917.	C240639705333	12/06/2024	3/07/2024	26/07/2024	18/06/2024	6	No	27/07/2024	26/07/2024	Yes	Yes	Yes	NP
918.	C240639714713	13/06/2024	4/07/2024	U	30/07/2024	47	No	28/07/2024	30/07/2024	No	No	Yes	Yes
919.	C240639779071	18/06/2024	9/07/2024	9/07/2024	25/07/2024	37	Yes	2/08/2024	9/07/2024	Yes	Yes	No	NP
920.	C240739855796	3/07/2024	24/07/2024	24/07/2024	7/08/2024	35	Yes	17/08/2024	19/08/2024	Yes	No	No	NP
921.	C240739873486	8/07/2024	29/07/2024	30/07/2024	29/07/2024	21	No	22/08/2024	30/08/2024	Yes	No	No	NP
922.	C220431727744	2/05/2022	23/05/2022	26/05/2022	26/05/2022	24	No	16/06/2022	26/05/2022	Yes	Yes	No	No
923.	C240739930958	12/07/2024	2/08/2024	2/08/2024	26/08/2024	45	Yes	26/08/2024	2/09/2024	Yes	No	No	Yes
924.	C240739944327	14/07/2024	4/08/2024	2/08/2024	27/08/2024	44	Yes	28/08/2024	27/08/2024	Yes	Yes	NP	No
925.	C240739970941	16/07/2024	6/08/2024	6/08/2024	20/08/2024	35	Yes	30/08/2024	27/08/2024	Yes	Yes	No	Yes
926.	C240740010378	21/07/2024	11/08/2024	9/08/2024	19/09/2024	60	Yes	4/09/2024	19/09/2024	No	No	No	Yes
927.	C240740036863	29/07/2024	19/08/2024	19/08/2024	24/09/2024	57	Yes	12/09/2024	24/09/2024	No	No	NP	NP
928.	C240840117168	7/08/2024	28/08/2024	30/08/2024	26/09/2024	50	No	21/09/2024	23/09/2024	No	No	No	Yes
929.	C240840199599	15/08/2024	5/09/2024	N/A	6/09/2024	22	N/A	29/09/2024	U	Yes	No	Yes	NP
930.	C240740031525	26/07/2024	16/08/2024	N/A	8/08/2024	13	Yes	9/09/2024	N/A	Yes	N/A	NP	NP

### Schedule G

# Systemic non-compliance with ePayments Code requirements

Period	Number of UARs received by HBAU	Number of UARs that complied with cl 38.4/ 18.1	Percentage of UARs that complied with cl 38.4/ 18.1	Number of UARs that complied with cl 38.5 / 18.2	Percentage of UARs that complied with cl 38.5 / 18.2	Number of UARs that complied with cl 38.4/ 18.1 & cl 38.5 / 18.2	Percentage of UARs that complied with cl 38.4/ 18.1 & cl 38.5 / 18.2	Median number of days to complete Investi- gation	Number of Investi- gations completed	Percentage of Investi- gations that reference Liability Rules	Number of Investi- gation Outcomes provided to Customers	% of Investi- gation Outcomes that do not reference Liability Rules
Jan 2020	1	0	0%	0	0%	0	0%	310	0	N/A	0	N/A
Feb 2020	5	0	0%	0	0%	0	0%	246	0	N/A	0	N/A
Mar 2020	1	0	0%	0	0%	0	0%	265	0	N/A	0	N/A
Apr 2020	0	N/A	N/A	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
May 2020	3	0	0%	0	0%	0	0%	280	0	N/A	0	N/A
Jun 2020	5	0	0%	0	0%	0	0%	174	0	N/A	0	N/A
Jul 2020	1	0	0%	0	0%	0	0%	218	0	N/A	0	N/A
Aug 2020	4	0	0%	0	0%	0	0%	112	1	0%	0	N/A
Sep 2020	3	0	0%	0	0%	0	0%	102	3	0%	0	N/A
Oct 2020	7	0	0%	0	0%	0	0%	103	2	0%	0	N/A
Nov 2020	2	0	0%	0	0%	0	0%	107	5	0%	0	N/A
Dec 2020	9	0	0%	0	0%	0	0%	178	6	0%	0	N/A
Total 2020	41	0	0%	0	0%	0	0%	180	17	0%	0	N/A

Period	Number of UARs received by HBAU	Number of UARs that complied with cl 38.4/ 18.1	Percentage of UARs that complied with cl 38.4/ 18.1	Number of UARs that complied with cl 38.5 / 18.2	Percentage of UARs that complied with cl 38.5 / 18.2	Number of UARs that complied with cl 38.4/ 18.1 & cl 38.5 / 18.2	Percentage of UARs that complied with cl 38.4/ 18.1 & cl 38.5 / 18.2	Median number of days to complete Investi- gation	Number of Investi- gations completed	Percentage of Investi- gations that reference Liability Rules	Number of Investi- gation Outcomes provided to Customers	% of Investi- gation Outcomes that do not reference Liability Rules
Jan 2021	6	0	0%	0	0%	0	0%	164	4	0%	0	N/A
Feb 2021	9	0	0%	0	0%	0	0%	175	5	0%	0	N/A
Mar 2021	5	0	0%	0	0%	0	0%	111	2	0%	0	N/A
Apr 2021	4	0	0%	0	0%	0	0%	93	1	0%	0	N/A
May 2021	2	0	0%	0	0%	0	0%	150	7	0%	0	N/A
Jun 2021	3	1	33%	1	33%	1	33%	92	15	0%	0	N/A
Jul 2021	2	0	0%	0	0%	0	0%	94	5	0%	0	N/A
Aug 2021	1	0	0%	0	0%	0	0%	48	3	0%	0	N/A
Sep 2021	7	1	14%	1	14%	1	14%	93	6	0%	0	N/A
Oct 2021	3	0	0%	2	67%	0	0%	40	6	0%	0	N/A
Nov 2021	4	0	0%	0	0%	0	0%	105	2	0%	0	N/A
Dec 2021	6	0	0%	0	0%	0	0%	143	2	0%	0	N/A
Total 2021	52	2	4%	4	8%	2	4%	132	58	0%	0	N/A
Jan 2022	3	2	67%	3	100%	2	67%	26	1	0%	0	N/A
Feb 2022	1	1	100%	1	100%	1	100%	15	10	0%	0	N/A

Period	Number of UARs received by HBAU	Number of UARs that complied with cl 38.4/ 18.1	Percentage of UARs that complied with cl 38.4/ 18.1	Number of UARs that complied with cl 38.5 / 18.2	Percentage of UARs that complied with cl 38.5 / 18.2	Number of UARs that complied with cl 38.4/ 18.1 & cl 38.5 / 18.2	Percentage of UARs that complied with cl 38.4/ 18.1 & cl 38.5 / 18.2	Median number of days to complete Investi- gation	Number of Investi- gations completed	Percentage of Investi- gations that reference Liability Rules	Number of Investi- gation Outcomes provided to Customers	% of Investi- gation Outcomes that do not reference Liability Rules
Mar 2022	6	2	33%	5	83%	2	33%	32	4	0%	0	N/A
Apr 2022	4	2	50%	3	75%	1	25%	30	4	0%	1	0%
May 2022	2	0	0%	1	50%	0	0%	46	8	0%	1	0%
Jun 2022	1	0	0%	1	100%	0	0%	35	0	N/A	0	N/A
Jul 2022	6	0	0%	1	17%	0	0%	47	4	0%	0	N/A
Aug 2022	6	0	0%	1	17%	0	0%	68	0	N/A	0	N/A
Sep 2022	5	0	0%	1	20%	0	0%	75	6	0%	0	N/A
Oct 2022	6	0	0%	0	0%	0	0%	112	4	0%	0	N/A
Nov 2022	4	1	25%	2	50%	1	25%	76	2	0%	1	0%
Dec 2022	2	0	0%	0	0%	0	0%	81	1	0%	1	0%
Total 2022	46	8	17%	19	41%	7	15%	52	44	0%	4	0%
Jan 2023	5	0	0%	0	0%	0	0%	63	9	0%	0	N/A
Feb 2023	5	0	0%	0	0%	0	0%	64	1	0%	0	N/A
Mar 2023	14	1	7%	3	21%	1	7%	94	8	0%	0	N/A
Apr 2023	6	0	0%	0	0%	0	0%	90	6	0%	0	N/A

Period	Number of UARs received by HBAU	Number of UARs that complied with cl 38.4/ 18.1	Percentage of UARs that complied with cl 38.4/ 18.1	Number of UARs that complied with cl 38.5 / 18.2	Percentage of UARs that complied with cl 38.5 / 18.2	Number of UARs that complied with cl 38.4/ 18.1 & cl 38.5 / 18.2	Percentage of UARs that complied with cl 38.4/ 18.1 & cl 38.5 / 18.2	Median number of days to complete Investi- gation	Number of Investi- gations completed	Percentage of Investi- gations that reference Liability Rules	Number of Investi- gation Outcomes provided to Customers	% of Investi- gation Outcomes that do not reference Liability Rules
May 2023	18	1	6%	1	6%	0	0%	99	3	0%	1	0%
Jun 2023	34	2	6%	3	9%	1	3%	199	3	0%	0	N/A
Jul 2023	33	1	3%	1	3%	1	3%	298	12	0%	1	0%
Aug 2023	35	1	3%	1	3%	0	0%	241	8	0%	7	0%
Sep 2023	71	0	0%	0	0%	0	0%	228	11	0%	5	0%
Oct 2023	108	0	0%	2	2%	0	0%	189	4	25%	1	0%
Nov 2023	105	29	28%	8	8%	3	3%	178	4	0%	4	0%
Dec 2023	80	26	33%	8	10%	3	4%	144	4	25%	3	33%
Total 2023	514	61	12%	27	5%	9	2%	183	73	3%	22	5%
Jan 2024	118	90	76%	6	5%	6	5%	119	5	20%	2	100%
Feb 2024	102	68	67%	14	14%	9	9%	99	40	95%	4	100%
Mar 2024	34	26	76%	20	59%	18	53%	23	96	86%	56	89%
Apr 2024	10	9	90%	2	20%	1	10%	47	130	95%	68	44%
May 2024	10	7	70%	2	20%	2	20%	27	173	99%	100	73%
Jun 2024	5	2	40%	3	60%	2	40%	37	145	94%	39	72%

Period	Number of UARs received by HBAU	Number of UARs that complied with cl 38.4/ 18.1	Percentage of UARs that complied with cl 38.4/ 18.1	Number of UARs that complied with cl 38.5 / 18.2	Percentage of UARs that complied with cl 38.5 / 18.2	Number of UARs that complied with cl 38.4/ 18.1 & cl 38.5 / 18.2	Percentage of UARs that complied with cl 38.4/ 18.1 & cl 38.5 / 18.2	Median number of days to complete Investi- gation	Number of Investi- gations completed	Percentage of Investi- gations that reference Liability Rules	Number of Investi- gation Outcomes provided to Customers	% of Investi- gation Outcomes that do not reference Liability Rules
Jul 2024	12	9	75%	2	17%	2	17%	35	24	38%	282	97%
Aug 2024	6	4	67%	3	50%	3	50%	39	9	11%	16	75%
Total 2024	297	215	72%	52	18%	43	14%	87	622	91%	567	83%
TOTAL 2020 - 2024	950	286	30%	102	11%	61	6%	140	814	69%	593	80%

#### Delay in removing Account Restrictions and reinstating Digital Access for Blocked Customers

Row	(a) UCM reference	(b) Date HBAU received UAR	(c) Date Customer's account was blocked or restricted by HBAU	(d) Nature of restrictions (Account Restriction, Digital Block, or Both)	(e) Date HBAU notified Customer of process to reinstate account access	(f) Number of days taken for HBAU to notify Customer of process to reinstate account access	(g) Date HBAU reinstated Digital Access and removed Account Restrictions	(h) Number of days for Digital Access reinstatement and Account Restrictions removed	(i) Date HBAU completed its Investigation	(j) Number of days taken to complete Investigation
1.	C200219887886	28/02/2020	28/02/2020	Account	27/03/2020	28	U <sup>1</sup>	2	24/08/2020	178
2.	C200521355637	21/05/2020	21/05/2020	Digital Block	9/11/2020	172	1/02/2021	256	31/12/2020	224
3.	C200521356767	22/05/2020	28/05/2020	Account	U	N/A <sup>3</sup>	9/10/2020	134	26/02/2021	280
4.	C200621429546	3/06/2020	8/07/2020	Account	U	N/A	4/06/2021	331	30/11/2020	180
5.	C200621460045	5/06/2020	5/06/2020	Digital Block	U	N/A	1/05/2021	330	26/11/2020	174
6.	C200621801446	15/06/2020	16/06/2020	Account	U	N/A	2/12/2021	534	24/11/2020	162
7.	C200621883645	27/06/2020	29/06/2020	Account	U	N/A	21/09/2020	84	4/09/2020	69
8.	C200822585336	10/08/2020	10/08/2020	Account	U	N/A	1/06/2021	295	25/05/2021	288
9.	C200822845520	1/10/2020	1/10/2020	Account	U	N/A	1/05/2021	212	4/06/2021	246
10.	C200923378656	25/09/2020	25/09/2020	Digital Block	U	N/A	U		21/12/2020	87
11.	C201023409697	2/10/2020	U	U	U	N/A	13/12/2021		13/01/2021	103
12.	C201023481574	8/10/2020	8/10/2020	Account	U	N/A	1/05/2021	205	18/01/2021	102
13.	C201023515219	11/10/2020	11/10/2020	Digital Block	U	N/A	1/04/2021	172	18/05/2021	219
14.	C201023519739	13/10/2020	13/10/2020	Digital Block	U	N/A	28/06/2021	258	16/12/2020	64
15.	C201023519739	13/10/2020	13/10/2020	Both	16/07/2021	276	1/10/2021	353	16/12/2020	64
16.	C201124296478	19/11/2020	20/11/2020	Digital Block	18/12/2020	28	U		30/03/2021	131
17.	C201224485336	2/12/2020	2/12/2020	Digital Block	U	N/A	1/10/2021	303	27/07/2021	237
18.	C201224875072	24/12/2020	29/12/2020	Digital Block	U	N/A	1/10/2021	276	30/09/2021	280
19.	C20200303211	13/02/2020	13/02/2020	Account	U	N/A	15/05/2020	92	16/10/2020	246
20.	C20200509518	19/05/2020	19/05/2020	Account	U	N/A	20/01/2021	246	30/06/2021	407
21.	C20200610313	27/02/2020	19/06/2020	Account	U	N/A	13/12/2021	542	30/06/2021	489

<sup>&</sup>lt;sup>1</sup> 'U' values in this Schedule H indicate HBAU has stated that the data is unavailable, so it can be inferred that HBAU did not take the step referred to in that column.

<sup>&</sup>lt;sup>2</sup> Blank values in this Schedule H indicate that HBAU has provided no information, so it can be inferred that HBAU did not take the step referred to in that column.

 $<sup>^{3}</sup>$  'N/A' values within this Schedule H indicate where the data is not applicable.

Row	(a) UCM reference	(b) Date HBAU received UAR	(c) Date Customer's account was blocked or restricted by HBAU	(d) Nature of restrictions (Account Restriction, Digital Block, or Both)	(e) Date HBAU notified Customer of process to reinstate account access	(f) Number of days taken for HBAU to notify Customer of process to reinstate account access	(g) Date HBAU reinstated Digital Access and removed Account Restrictions	(h) Number of days for Digital Access reinstatement and Account Restrictions removed	(i) Date HBAU completed its Investigation	(j) Number of days taken to complete Investigation
22.	C20200806640	13/08/2020	U	U	U	N/A	13/12/2021		24/09/2020	42
23.	C20201008998	12/10/2020	12/10/2020	Digital Block	U	N/A	1/02/2021	112	23/06/2021	254
24.	C20201201286	1/12/2020	2/12/2020	Account	U	N/A	2/12/2021	365	26/02/2021	87
25.	C20201201306	1/12/2020	2/12/2020	Account	U	N/A	5/01/2022	399	17/05/2021	167
26.	C20201201353	29/11/2020	30/11/2020	Digital Block	U	N/A	U		19/02/2021	82
27.	C20210100945	3/01/2021	3/01/2021	Digital Block	U	N/A	1/02/2021	29	4/06/2021	152
28.	C210124914179	5/01/2021	5/01/2021	Digital Block	U	N/A	1/05/2021	116	30/06/2021	176
29.	C210124974949	8/01/2021	8/01/2021	Digital Block	U	N/A	13/12/2021	339	20/07/2021	193
30.	C210125207405	15/01/2021	U	U	U	N/A	5/01/2022		31/05/2021	136
31.	C210125359515	25/01/2021	27/01/2021	Account	18/02/2021	22	1/10/2021	247	20/05/2021	115
32.	C210225778399	18/02/2021	18/02/2021	Account	1/04/2021	42	1/04/2021	42	27/06/2021	129
33.	C210225813859	22/02/2021	25/02/2021	Account	U	N/A	1/03/2022	369	21/09/2021	211
34.	C210325968829	2/02/2021	2/02/2021	Account	U	N/A	13/12/2021	314	3/09/2021	213
35.	C210326032781	10/03/2021	10/03/2021	Digital Block	U	N/A	1/05/2021	52	18/06/2021	100
36.	C210326034569	11/03/2021	11/03/2021	Account	U	N/A	28/06/2021	109	30/06/2021	111
37.	C210426459119	6/04/2021	6/04/2021	Both	2/06/2021	57	10/06/2021	65	28/04/2021	22
38.	C210526862495	3/05/2021	3/05/2021	Digital Block	27/05/2021	24	27/05/2021	24	30/09/2021	150
39.	C210627641582	22/06/2021	22/06/2021	Digital Block	U	N/A	13/12/2021	174	18/01/2022	210
40.	C210627712701	30/06/2021	30/06/2021	Both	U	N/A	5/01/2022	189	30/09/2021	92
41.	C210728145659	17/07/2021	17/07/2021	Both	26/10/2021	101	1/10/2021	76	12/10/2021	87
42.	C210928761725	4/09/2021	10/09/2021	Account	2/11/2021	53	6/10/2021	26	15/12/2021	102
43.	C210928813950	11/09/2021	11/09/2021	Digital Block	U	N/A	5/01/2022	116	18/10/2021	37
44.	C211029166546	6/10/2021	7/10/2021	Digital Block	U	N/A	13/12/2021	67	29/10/2021	23
45.	C211029369482	10/09/2021	10/09/2021	Both	U	N/A	7/01/2022	119	14/02/2022	157
46.	C211029380226	21/10/2021	21/10/2021	Digital Block	31/12/2021	71	15/02/2022	117	25/02/2022	127
47.	C211129789840	20/11/2021	20/11/2021	Digital Block	U	N/A	U		29/04/2022	160
48.	C211129797951	22/11/2021	22/11/2021	Account	U	N/A	U		18/02/2022	88
49.	C211229895070	3/12/2021	3/12/2021	Account	U	N/A	5/01/2022	33	29/03/2022	116

Row	(a) UCM reference	(b) Date HBAU received UAR	(c) Date Customer's account was blocked or restricted by HBAU	(d) Nature of restrictions (Account Restriction, Digital Block, or Both)	(e) Date HBAU notified Customer of process to reinstate account access	(f) Number of days taken for HBAU to notify Customer of process to reinstate account access	(g) Date HBAU reinstated Digital Access and removed Account Restrictions	(h) Number of days for Digital Access reinstatement and Account Restrictions removed	(i) Date HBAU completed its Investigation	(j) Number of days taken to complete Investigation
50.	C231238031419	3/12/2023	3/12/2023	Both	22/07/2024	232	24/06/2024	204	9/08/2024	250
51.	C231037704082	30/10/2023	30/10/2023	Digital Block	3/05/2024	186	3/05/2024	186	21/03/2024	143
52.	C230937303207	29/09/2023	29/09/2023	Account	U	N/A	26/05/2024	240	7/06/2024	252
53.	C231037366300	6/10/2023	6/10/2023	Digital Block	24/04/2024	201	24/04/2024	201	1/05/2024	208
54.	C240138447423	18/01/2024	18/01/2024	Digital Block	22/07/2024	186	9/07/2024	173	29/05/2024	132
55.	C231037652177	22/10/2023	22/10/2023	Digital Block	31/07/2024	283	31/07/2024	283	4/03/2024	134
56.	C230937219239	21/09/2023	21/09/2023	Digital Block	12/06/2024	265	12/06/2024	265	1/05/2024	223
57.	C240138442540	17/01/2024	17/01/2024	Digital Block	22/07/2024	187	22/07/2024	187	21/05/2024	125
58.	C231037613256	20/10/2023	7/11/2023	Account	16/04/2024	161	U	N/A	16/04/2024	179
59.	C231137797059	10/11/2023	10/11/2023	Digital Block	13/05/2024	185	U	N/A	30/05/2024	202
60.	C231037541972	15/10/2023	15/10/2023	Digital Block	9/05/2024	207	U	N/A	4/05/2024	202
61.	C231037337219	2/10/2023	2/10/2023	Digital Block	4/03/2024	154	19/12/2023	78	26/02/2024	147
62.	C240138312683	8/01/2024	8/01/2024	Digital Block	1/03/2024	53	U	N/A	1/03/2024	53
63.	C240138359151	11/01/2024	11/01/2024	Digital Block	12/04/2024	92	12/04/2024	92	12/04/2024	92
64.	C231238212415	19/12/2023	19/12/2023	Digital Block	29/05/2024	162	28/02/2024	71	17/05/2024	150
65.	C231238086508	11/12/2023	12/12/2023	Both	20/05/2024	160	31/01/2024	50	25/04/2024	136
66.	C230937222870	21/09/2023	21/09/2023	Digital Block	U	N/A	20/11/2023	60	5/04/2024	197
67.	C231037652200	22/10/2023	22/10/2023	Digital Block	11/04/2024	172	19/01/2024	89	1/04/2024	162
68.	C231238026718	2/12/2023	2/12/2023	Digital Block	19/04/2024	139	23/04/2024	143	8/04/2024	128
69.	C240339018366	3/02/2024	3/02/2024	Both	U	N/A	13/06/2024	131	18/06/2024	136
70.	C231137789410	9/11/2023	9/11/2023	Digital Block	16/05/2024	189	16/05/2024	189	16/05/2024	189
71.	C230636108862	7/06/2023	7/06/2023	Digital Block	23/08/2023	77	20/09/2023	105	20/09/2023	105
72.	C240338851359	4/03/2024	4/03/2024	Both	U	N/A	28/03/2024	24	27/03/2024	23
73.	C240539404039	26/02/2024	U	U	6/08/2024		6/08/2024	N/A	12/07/2024	137
74.	C240138357268	11/01/2024	11/01/2024	Digital Block	22/07/2024	193	U	N/A	20/05/2024	130
75.	C230936988521	5/09/2023	5/09/2023	Digital Block	12/06/2024	281	12/07/2024	311	1/05/2024	239
76.	C231238248185	24/12/2023	24/12/2023	Digital Block	19/07/2024	208	U	N/A	10/06/2024	169
77.	C231037417709	11/10/2023	11/10/2023	Digital Block	22/07/2024	285	15/04/2024	187	7/05/2024	209

Row	(a) UCM reference	(b) Date HBAU received UAR	(c) Date Customer's account was blocked or restricted by HBAU	(d) Nature of restrictions (Account Restriction, Digital Block, or Both)	(e) Date HBAU notified Customer of process to reinstate account access	(f) Number of days taken for HBAU to notify Customer of process to reinstate account access	(g) Date HBAU reinstated Digital Access and removed Account Restrictions	(h) Number of days for Digital Access reinstatement and Account Restrictions removed	(i) Date HBAU completed its Investigation	(j) Number of days taken to complete Investigation
78.	C231037654575	19/10/2023	19/10/2023	Account	22/07/2024	277	4/07/2024	259	30/04/2024	194
79.	C240739873486	8/07/2024	8/07/2024	Both	U	N/A	21/08/2024	44	29/07/2024	21
80.	C230836900468	24/08/2023	24/08/2023	Digital Block	31/07/2024	342	25/06/2024	306	9/04/2024	229
81.	C240138565857	30/01/2024	30/01/2024	Both	15/05/2024	106	16/05/2024	107	6/04/2024	67
82.	C240138284517	5/01/2024	5/01/2024	Digital Block	1/05/2024	117	2/05/2024	118	6/04/2024	92
83.	C240138519792	25/01/2024	25/01/2024	Account	U	N/A	23/02/2024	29	12/07/2024	169
84.	C240339025130	19/03/2024	19/03/2024	Account	U	N/A	U	N/A	5/06/2024	78
85.	C240138417808	15/01/2024	15/01/2024	Both	14/05/2024	120	17/05/2024	123	22/02/2024	38
86.	C230937272335	27/09/2023	27/09/2023	Account	U	N/A	U	N/A	U	N/A
87.	C240138523929	27/01/2024	29/01/2024	Both	15/04/2024	77	U	N/A	29/01/2024	2
88.	C220531899979	13/05/2022	13/05/2022	Digital Block	U	N/A	5/04/2023	327	20/07/2022	68
89.	C231238212762	19/12/2023	27/12/2023	Digital Block	N/A	N/A	24/04/2024	119	19/03/2024	91
90.	C231037660893	24/10/2023	24/10/2023	Both	U	N/A	21/03/2024	149	U	N/A
91.	C240138441373	17/01/2024	17/01/2024	Digital Block	29/04/2024	103	31/05/2024	135	U	N/A
92.	C230536034232	2/02/2024	2/02/2024	Digital Block	U	N/A	3/06/2024	122	1/04/2024	59
93.	C220933203259	14/11/2023	11/08/2023	Account	22/04/2024	255	15/08/2024	370	13/06/2024	212
94.	C230134703504	19/02/2024	19/02/2024	Both	30/04/2024	71	30/04/2024	71	6/05/2024	77
95.	C240238750747	15/01/2024	15/01/2024	Both	26/04/2024	102	26/04/2024	102	U	N/A
96.	C240138418104	21/11/2023	21/11/2023	Both	U	N/A	21/05/2024	182	15/04/2024	146
97.	C230937214585	1/10/2023	1/10/2023	Digital Block	U	N/A	2/12/2023	62	22/05/2024	234
98.	C231037375180	2/02/2024	2/02/2024	Account	11/07/2024	160	14/06/2024	133	7/06/2024	126
99.	C240238575239	19/01/2024	19/01/2024	Account	U	N/A	22/03/2024	63	3/06/2024	136
100.	C240138466825	14/12/2023	14/12/2023	Account	10/05/2024	148	14/05/2024	152	19/04/2024	127
101.	C231037336743	21/09/2023	21/09/2023	Digital Block	U	N/A	15/11/2023	55	6/03/2024	167
102.	C230937222425	6/02/2024	6/02/2024	Account	2/05/2024	86	3/05/2024	87	9/04/2024	63
103.	C240238576567	24/02/2024	26/02/2024	Account	23-May-24	87	23/05/2024	87	15/05/2024	81
104.	C240238784583	23/02/2024	1/03/2024	Account	U	N/A	27/03/2024	26	27/03/2024	33
105.	C240238566576	6/10/2023	6/10/2023	Account	8/05/2024	215	16/02/2024	133	30/04/2024	207

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106.	C231037366123	21/10/2023	23/10/2023	Account	5/03/2024	134	29/01/2024	98	16/02/2024	118
107.	C231238070541	3/01/2024	3/01/2024	Account	U	N/A	29/01/2024	26	7/05/2024	125
108.	C240138262826	7/07/2023	7/07/2023	Digital Block	U	N/A	18/08/2023	42	12/03/2024	249
109.	C230736373148	16/01/2024	16/01/2024	Account	U	N/A	13/05/2024	118	15/04/2024	90
110.	C240138437533	7/09/2023	7/09/2023	Account	10-May-24	246	10/05/2024	246	10/05/2024	246
111.	C230937007417	12/01/2024	12/01/2024	Account	U	N/A	22/02/2024	41	19/04/2024	98
112.	C240238785162	31/01/2024	31/01/2024	Digital Block	22/07/2024	173	3/06/2024	124	8/04/2024	68
113.	C231137713634	16/10/2023	16/10/2023	Account	U	N/A	6/02/2024	113	7/03/2024	143
114.	C231037543487	24/11/2023	24/11/2023	Account	U	N/A	27/12/2023	33	7/03/2024	104
115.	C231037656189	22/11/2023	22/11/2023	Account	9-May-24	169	9/05/2024	169	9/05/2024	169
116.	C231238087164	6/11/2023	6/11/2023	Account	U	N/A	7/12/2023	31	2/04/2024	148
117.	C231137758704	9/03/2024	11/03/2024	Account	U	N/A	11/04/2024	31	26/03/2024	17
118.	C240338876809	10/02/2024	12/02/2024	Account	U	N/A	25/03/2024	42	6/05/2024	86
119.	C240238652847	20/10/2023	20/10/2023	Account	12-Apr-24	175	4/04/2024	167	11/04/2024	174
120.	C231037613401	6/10/2023	6/10/2023	Digital Block	U	N/A	20/11/2023	45	6/03/2024	152
121.	C231037366441	6/02/2024	6/02/2024	Account	11-Jun-24	126	29/05/2024	113	29/04/2024	83
122.	C240238616810	28/02/2024	29/02/2024	Account	17-Apr-24	48	17/04/2024	48	17/04/2024	49
123.	C240238802995	21/10/2023	23/10/2023	Account	3-May-24	193	1/03/2024	130	15/04/2024	177
124.	C231037619639	20/10/2023	20/10/2023	Digital Block	3-May-24	196	29/12/2023	70	16/04/2024	179
125.	C231037618597	28/02/2024	28/02/2024	Account	U	N/A	28/03/2024	29	3/05/2024	65
126.	C231037615567	12/12/2023	12/12/2023	Account	18-Mar-24	97	25/01/2024	44	18/03/2024	97
127.	C231238096058	5/02/2024	5/02/2024	Account	U	N/A	10/05/2024	95	23/04/2024	78
128.	C240238614638	31/10/2023	1/11/2023	Account	13-Mar-24	133	12/03/2024	132	7/03/2024	128
129.	C231037707887	17/01/2024	18/01/2024	Digital Block	U	N/A	11/04/2024	84	15/04/2024	89
130.	C240138442951	2/02/2024	2/02/2024	Account	U	N/A	8/03/2024	35	22/02/2024	20
131.	C240138334437	1/02/2024	1/02/2024	Account	U	N/A	14/05/2024	103	11/04/2024	70
132.	C240238566296	18/01/2024	18/01/2024	Account	U	N/A	19/02/2024	32	19/04/2024	92
133.	C240138464887	20/11/2023	20/11/2023	Account	14-May-24	176	23/05/2024	185	12/04/2024	144

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134.	C240238769879	14/02/2024	15/02/2024	Account	U	N/A	23/04/2024	68	6/06/2024	113
135.	C231137773843	1/11/2023	4/01/2024	Account	U	N/A	8/05/2024	125	30/04/2024	181
136.	C231137889412	16/02/2024	16/02/2024	Account	U	N/A	25/03/2024	38	10/06/2024	115
137.	C240238716475	21/09/2023	22/09/2023	Account	28-Aug-24	341	25/07/2024	307	22/03/2024	183
138.	C230836761531	5/02/2024	6/02/2024	Account	31-Jul-24	176	2/08/2024	178	31/07/2024	177
139.	C240238614884	18/10/2023	18/10/2023	Digital Block	U	N/A	20/11/2023	33	4/04/2024	169
140.	C231037590718	15/11/2023	15/11/2023	Both	U	N/A	4/03/2024	110	12/04/2024	149
141.	C231137883323	6/02/2024	13/02/2024	Account	U	N/A	29/04/2024	76	12/04/2024	66
142.	C240238621136	27/01/2024	29/01/2024	Digital Block	23/05/2024	115	4/03/2024	35	9/05/2024	103
143.	C240138552445	15/02/2024	15/02/2024	Account	18/05/2024	93	15/05/2024	90	20/04/2024	65
144.	C240238692046	15/11/2023	15/11/2023	Digital Block	U	N/A	22/02/2024	99	15/05/2024	182
145.	C231238087876	8/10/2023	11/10/2023	Account	U	N/A	9/05/2024	211	16/04/2024	191
146.	C240138494872	9/10/2023	9/10/2023	Account	11/04/2024	185	11/03/2024	154	3/04/2024	177
147.	C231037405851	28/09/2023	28/09/2023	Digital Block	13/05/2024	228	30/01/2024	124	26/04/2024	211
148.	C230937298729	26/02/2024	29/02/2024	Account	16/05/2024	77	20/05/2024	81	6/06/2024	101
149.	C240238786540	30/01/2024	30/01/2024	Account	29/04/2024	90	21/03/2024	51	23/04/2024	84
150.	C240138557043	18/12/2023	18/12/2023	Account	15/05/2024	149	20/05/2024	154	17/04/2024	121
151.	C231238177985	17/01/2024	18/01/2024	Account	U	N/A	4/04/2024	77	16/04/2024	90
152.	C240138442607	7/10/2023	9/10/2023	Digital Block	28/05/2024	232	27/05/2024	231	11/05/2024	217
153.	C240338874857	27/10/2023	27/10/2023	Account	30/08/2024	308	7/02/2024	103	8/05/2024	194
154.	C231037674496	27/09/2023	27/09/2023	Account	U	N/A	5/01/2024	100	23/02/2024	149
155.	C230937287143	30/10/2023	30/10/2023	Account	4/03/2024	126	4/03/2024	126	16/02/2024	109
156.	C231037703693	6/10/2023	6/10/2023	Account	5/02/2024	122	16/02/2024	133	22/05/2024	229
157.	C231037365657	1/02/2024	1/02/2024	Account	2/05/2024	91	24/04/2024	83	5/04/2024	64
158.	C240238785744	7/11/2023	7/11/2023	Account	8/05/2024	183	14/05/2024	189	5/04/2024	150
159.	C231137770952	22/09/2023	22/09/2023	Account	24/05/2024	245	16/02/2024	147	10/05/2024	231
160.	C230937226842	11/07/2023	11/07/2023	Digital Block	28/03/2024	261	16/10/2023	97	22/03/2024	255
161.	C230736426233	12/01/2024	12/01/2024	Account	26/04/2024	105	27/03/2024	75	15/03/2024	63

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162.	C240138372547	20/06/2023	20/06/2023	Digital Block	3/05/2024	318	2/03/2024	256	19/04/2024	304
163.	C230636248844	20/10/2023	20/10/2023	Digital Block	U	N/A	2/04/2024	165	6/04/2024	169
164.	C240138262764	29/11/2023	30/11/2023	Account	21/05/2024	173	17/04/2024	139	21/05/2024	174
165.	C231138015475	22/10/2023	23/10/2023	Account	18/03/2024	147	8/02/2024	108	12/03/2024	142
166.	C231037652077	22/01/2024	22/01/2024	Account	U	N/A	25/03/2024	63	6/04/2024	75
167.	C231137895584	20/10/2023	20/10/2023	Account	21/05/2024	214	16/02/2024	119	26/04/2024	189
168.	C231037613060	17/10/2023	18/10/2023	Account	21/03/2024	155	29/12/2023	72	4/03/2024	139
169.	C231037552564	2/02/2024	2/02/2024	Account	8/03/2024	35	1/03/2024	28	22/02/2024	20
170.	C240238574775	27/09/2023	27/09/2023	Account	20/05/2024	236	16/02/2024	142	17/05/2024	233
171.	C230937288788	16/02/2024	19/02/2024	Account	1/05/2024	72	24/04/2024	65	5/04/2024	49
172.	C240238717772	29/08/2023	29/08/2023	Digital Block	U	N/A	20/11/2023	83	6/04/2024	221
173.	C230836932560	3/08/2023	4/08/2023	Account	13/03/2024	222	5/09/2023	32	23/02/2024	204
174.	C230836639046	7/01/2024	8/01/2024	Account	6/08/2024	211	8/07/2024	182	6/06/2024	151
175.	C240138390868	6/11/2023	6/11/2023	Digital Block	U	N/A	9/01/2024	64	5/04/2024	151
176.	C231137758980	16/11/2023	16/11/2023	Account	3/05/2024	169	20/05/2024	186	12/04/2024	148
177.	C231137889234	12/01/2024	12/01/2024	Account	U	N/A	15/03/2024	63	6/04/2024	85
178.	C240138372521	25/11/2023	25/11/2023	Digital Block	22/02/2024	89	20/03/2024	116	17/06/2024	205
179.	C231137981656	22/09/2023	22/09/2023	Digital Block	22/04/2024	213	17/05/2024	238	10/05/2024	231
180.	C231238068695	22/11/2023	22/11/2023	Digital Block	16/05/2024	176	27/06/2024	218	1/05/2024	161
181.	C231238103041	20/11/2023	20/11/2023	Digital Block	10/05/2024	172	14/05/2024	176	30/04/2024	162
182.	C231037336739	4/10/2023	4/10/2023	Digital Block	2/11/2023	29	14/11/2023	41	22/02/2024	141
183.	C230936989963	16/10/2023	16/10/2023	Digital Block	17/11/2023	32	20/11/2023	35	30/04/2024	197
184.	C231037544255	23/10/2023	23/10/2023	Both	12/04/2024	172	12/04/2024	172	27/03/2024	156
185.	C231037652414	13/09/2023	22/11/2023	Digital Block	U	N/A	7/05/2024	167	14/03/2024	183
186.	C230937073222	26/08/2023	28/08/2023	Digital Block	20/11/2023	84	20/11/2023	84	7/03/2024	194
187.	C230836910018	27/09/2023	27/09/2023	Digital Block	6/12/2023	70	6/12/2023	70	14/05/2024	230
188.	C230937284098	19/09/2023	19/09/2023	Digital Block	1/05/2024	225	22/05/2024	246	13/05/2024	237
189.	C230937190655	20/10/2023	20/10/2023	Digital Block	26/04/2024	189	6/05/2024	199	29/04/2024	192

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190.	C240339080624	30/09/2023	30/09/2023	Digital Block	2/02/2024	125	14/02/2024	137	2/06/2024	246
191.	C240238613949	15/11/2023	15/11/2023	Account	18/01/2024	64	26/03/2024	132	21/03/2024	127
192.	C231137883128	18/01/2024	18/01/2024	Both	25/07/2024	189	1/08/2024	196	22/03/2024	64
193.	C240238739865	28/03/2024	2/04/2024	Account	2/09/2024	153	2/09/2024	153	31/07/2024	125
194.	C231238222228	20/12/2023	20/12/2023	Digital Block	U	N/A	21/05/2024	153	7/05/2024	139
195.	C231238215608	12/10/2023	12/10/2023	Digital Block	1/03/2024	141	22/04/2024	193	18/06/2024	250
196.	C240138266991	12/09/2023	12/09/2023	Digital Block	26/02/2024	167	U	N/A	16/02/2024	157
197.	C230937056376	31/01/2024	31/01/2024	Both	22/03/2024	51	N/A	N/A	21/03/2024	50
198.	C230937237080	6/02/2024	6/02/2024	Both	20/03/2024	43	2/05/2024	86	25/04/2024	79
199.	C240238618626	13/12/2023	13/12/2023	Both	26/04/2024	135	10/06/2024	180	4/01/2024	22
200.	C231238128282	31/01/2024	31/01/2024	Both	U	N/A	23/04/2024	83	26/04/2024	86
201.	C240238571992	29/09/2023	29/09/2023	Digital Block	15/02/2024	139	15/02/2024	139	26/03/2024	179
202.	C231238086638	12/01/2024	12/01/2024	Both	6/05/2024	115	8/08/2024	209	16/02/2024	35
203.	C240138387014	27/09/2023	28/09/2023	Digital Block	18/01/2024	112	20/11/2023	53	6/05/2024	222
204.	C230937295189	22/10/2023	22/10/2023	Both	16/02/2024	117	22/04/2024	183	10/06/2024	232
205.	C231037652240	13/10/2023	13/10/2023	Account	29/04/2024	199	20/11/2023	38	1/05/2024	201
206.	C231037472758	22/01/2024	22/01/2024	Digital Block	1/03/2024	39	19/08/2024	210	29/05/2024	128
207.	C240138495287	17/01/2024	17/01/2024	Digital Block	2/05/2024	106	U	N/A	26/04/2024	100
208.	C240238744582	21/09/2023	21/09/2023	Digital Block	10/11/2023	50	U	N/A	10/05/2024	232
209.	C230937221995	18/02/2024	18/02/2024	Account	U	N/A	U	N/A	8/06/2024	111
210.	C240238739822	24/10/2023	24/10/2023	Account	15/05/2024	204	U	N/A	6/04/2024	165
211.	C231037656486	15/01/2024	15/01/2024	Digital Block	13/05/2024	119	U	N/A	5/06/2024	142
212.	C240138417736	13/09/2023	U	U	15/05/2024		20/11/2023	N/A	14/05/2024	244
213.	C240238717538	14/10/2023	16/10/2023	Both	9/01/2024	85	5/04/2024	172	9/05/2024	208
214.	C230937173896	6/02/2024	6/02/2024	Digital Block	30/05/2024	114	23/05/2024	107	5/06/2024	120
215.	C231137796627	20/11/2023	20/11/2023	Digital Block	7/05/2024	169	10/05/2024	172	14/05/2024	176
216.	C231137941493	15/11/2023	15/11/2023	Both	1/05/2024	168	26/07/2024	254	4/04/2024	141
217.	C231037655883	24/10/2023	24/10/2023	Digital Block	2/05/2024	191	23/05/2024	212	29/02/2024	128

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218.	C230937237238	23/09/2023	25/09/2023	Digital Block	6/06/2024	255	16/02/2024	144	2/05/2024	222
219.	C231137979027	24/11/2023	24/11/2023	Both	15/05/2024	173	16/04/2024	144	11/03/2024	108
220.	C231037375008	7/10/2023	7/10/2023	Digital Block	4/04/2024	180	19/04/2024	195	19/04/2024	195
221.	C231037374984	6/10/2023	7/10/2023	Digital Block	10/05/2024	216	8/05/2024	214	7/05/2024	214
222.	C230937188161	19/09/2023	21/09/2023	Both	10/02/2024	142	14/02/2024	146	10/06/2024	265
223.	C231238085468	9/12/2023	9/12/2023	Both	23/04/2024	136	25/06/2024	199	7/05/2024	150
224.	C240138259893	3/01/2024	3/01/2024	Digital Block	U	N/A	28/06/2024	177	31/05/2024	149
225.	C240138442521	17/01/2024	17/01/2024	Digital Block	N/A	N/A	20/02/2024	34	5/06/2024	140
226.	C240238791211	27/02/2024	27/02/2024	Digital Block	19/04/2024	52	22/04/2024	55	6/04/2024	39
227.	C240138262639	3/01/2024	3/01/2024	Account	23/07/2024	202	21/06/2024	170	17/05/2024	135
228.	C230937257483	24/09/2023	24/09/2023	Digital Block	N/A	N/A	2/07/2024	282	19/06/2024	269
229.	C230937222183	21/09/2023	21/09/2023	both	16/07/2024	299	16/07/2024	299	25/06/2024	278
230.	C230937289201	27/09/2023	27/09/2023	Digital Block	N/A	N/A	20/11/2023	54	3/05/2024	219
231.	C231137889302	16/11/2023	16/11/2023	Digital Block	24/07/2024	251	20/05/2024	186	10/05/2024	176
232.	C231238178032	18/12/2023	18/12/2023	Both	N/A	N/A	19/01/2024	32	8/02/2024	52
233.	C240138444356	18/01/2024	18/01/2024	Digital Block	22/07/2024	186	16/02/2024	29	22/05/2024	125
234.	C231037651883	22/10/2023	22/10/2023	Digital Block	22/07/2024	274	21/12/2023	60	15/04/2024	176
235.	C240138519315	25/01/2024	25/01/2024	Both	24/07/2024	181	24/07/2024	181	10/06/2024	137
236.	C231137889334	16/11/2023	16/11/2023	Digital Block	24/07/2024	251	17/05/2024	183	14/05/2024	180
237.	C240138417981	15/01/2024	15/01/2024	Digital Block	27/07/2024	194	10/07/2024	177	21/05/2024	127
238.	C240138319141	9/01/2024	9/01/2024	Digital Block	N/A	N/A	18/03/2024	69	20/05/2024	132
239.	C240238663850	12/02/2024	12/02/2024	Digital Block	30/07/2024	169	29/07/2024	168	23/05/2024	101
240.	C240238613934	4/02/2024	5/02/2024	Digital Block	29/04/2024	84	1/07/2024	147	1/06/2024	118
241.	C240238614295	5/02/2024	5/02/2024	Digital Block	U	N/A	17/05/2024	102	2/04/2024	57
242.	C230937237074	23/09/2023	23/09/2023	Both	5/07/2024	286	20/11/2023	58	13/06/2024	264
243.	C240238615062	5/02/2024	5/02/2024	Digital Block	N/A	N/A	20/06/2024	136	24/05/2024	109
244.	C231238128226	13/12/2023	13/12/2023	Digital Block	N/A	N/A	20/05/2024	159	17/05/2024	156
245.	C231137855364	14/11/2023	14/11/2023	Digital Block	2/05/2024	170	23/05/2024	191	25/06/2024	224

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246.	C240238613950	4/02/2024	4/02/2024	Both	15/05/2024	101	17/05/2024	103	5/06/2024	122
247.	C240138396216	14/01/2024	14/01/2024	Both	U	N/A	21/02/2024	38	21/05/2024	128
248.	C240238740150	19/02/2024	19/02/2024	Both	U	N/A	26/04/2024	67	31/05/2024	102
249.	C231137712055	1/11/2023	1/11/2023	Account	6/03/2024	126	6/03/2024	126	22/05/2024	203
250.	C230937208063	20/09/2023	20/09/2023	Digital Block	22/07/2024	306	10/07/2024	294	8/06/2024	262
251.	C231037357165	5/10/2023	5/10/2023	Digital Block	U	N/A	18/11/2023	44	2/06/2024	241
252.	C231037704458	30/10/2023	30/10/2023	Digital Block	22/07/2024	266	26/02/2024	119	8/05/2024	191
253.	C231137827145	12/11/2023	13/11/2023	Digital Block	19/07/2024	249	16/07/2024	246	14/05/2024	184
254.	C231037589750	18/10/2023	18/10/2023	Digital Block	U	N/A	1/12/2023	44	24/04/2024	189
255.	C231137979136	24/11/2023	24/11/2023	Digital Block	24/07/2024	243	10/01/2024	47	14/05/2024	172
256.	C231037651882	22/10/2023	22/10/2023	Digital Block	27/05/2024	218	29/01/2024	99	9/05/2024	200
257.	C231037405141	8/10/2023	8/10/2023	Digital Block	U	N/A	8/11/2023	31	6/03/2024	150
258.	C240138262779	3/01/2024	3/01/2024	Both	U	N/A	13/02/2024	41	30/05/2024	148
259.	C230937188024	19/09/2023	19/09/2023	Digital Block	14/08/2024	330	29/04/2024	223	26/03/2024	189
260.	C231238237082	24/12/2023	24/12/2023	Digital Block	3/07/2024	192	3/07/2024	192	17/05/2024	145
261.	C231137899531	18/11/2023	18/11/2023	Digital Block	9/02/2024	83	31/05/2024	195	29/05/2024	193
262.	C240238685211	14/02/2024	15/02/2024	Account	23/07/2024	159	23/07/2024	159	21/06/2024	128
263.	C240238665162	13/02/2024	14/02/2024	Account	22/07/2024	159	22/07/2024	159	16/06/2024	124
264.	C231037338031	2/10/2023	2/10/2023	Account	13/03/2024	163	13/03/2024	163	1/03/2024	151
265.	C231037708964	30/10/2023	30/10/2023	Account	13/05/2024	196	17/05/2024	200	17/05/2024	200
266.	C240138558801	30/01/2024	30/01/2024	Account	18/07/2024	170	17/07/2024	169	21/05/2024	112
267.	C231238104503	12/12/2023	12/12/2023	Account	1/05/2024	141	16/07/2024	217	25/06/2024	196
268.	C231037367477	7/10/2023	17/10/2023	Account	U	N/A	2/05/2024	198	16/05/2024	222
269.	C231037366622	6/10/2023	9/10/2023	Digital Block	13/06/2024	248	19/02/2024	133	17/05/2024	224
270.	C230937310181	30/09/2023	2/10/2023	Account	24/07/2024	296	24/04/2024	205	15/05/2024	228
271.	C240138472599	20/01/2024	22/01/2024	Account	22/07/2024	182	21/06/2024	151	10/05/2024	111
272.	C230937257961	25/09/2023	25/09/2023	Digital Block	U	N/A	20/11/2023	56	17/05/2024	235
273.	C231137981812	25/11/2023	27/11/2023	Account	U	N/A	18/03/2024	112	23/04/2024	150

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274.	C240238578342	3/02/2024	5/02/2024	Account	U	N/A	7/06/2024	123	30/04/2024	87
275.	C240138357488	11/01/2024	11/01/2024	Account	24/07/2024	195	24/07/2024	195	19/06/2024	160
276.	C240238717311	16/02/2024	16/02/2024	Account	10/05/2024	84	10/05/2024	84	18/06/2024	123
277.	C240138441539	17/01/2024	18/01/2024	Account	U	N/A	1/07/2024	165	28/06/2024	163
278.	C240238689810	14/02/2024	15/02/2024	Account	5/07/2024	141	5/07/2024	141	7/06/2024	114
279.	C240238802722	28/02/2024	12/03/2024	Account	U	N/A	12/04/2024	31	U	N/A
280.	C240238621392	7/02/2024	7/02/2024	Account	3/07/2024	147	3/07/2024	147	1/06/2024	115
281.	C231137975840	22/11/2023	22/11/2023	Account	U	N/A	31/05/2024	191	12/06/2024	203
282.	C240238614303	2/02/2024	2/02/2024	Account	U	N/A	23/05/2024	111	9/06/2024	128
283.	C230937222073	21/09/2023	29/09/2023	Account	U	N/A	20/11/2023	52	30/05/2024	252
284.	C240238748481	19/02/2024	19/02/2024	Digital Block	1/05/2024	72	29/05/2024	100	8/06/2024	110
285.	C240338864804	8/03/2024	8/03/2024	Account	U	N/A	23/04/2024	46	28/03/2024	20
286.	C231238087689	11/12/2023	11/12/2023	Account	16/05/2024	157	30/05/2024	171	29/04/2024	140
287.	C240138556950	30/01/2024	30/01/2024	Account	U	N/A	1/07/2024	153	29/04/2024	90
288.	C231037405625	9/10/2023	9/10/2023	Digital Block	U	N/A	21/02/2024	135	7/06/2024	242
289.	C240539573807	27/05/2024	27/05/2024	Account	23/07/2024	57	19/06/2024	23	20/06/2024	24
290.	C231238129910	13/12/2023	14/12/2023	Account	22/07/2024	221	11/07/2024	210	9/06/2024	179
291.	C240238611499	4/02/2024	5/02/2024	Account	U	N/A	4/06/2024	120	28/06/2024	145
292.	C240238665048	12/02/2024	12/02/2024	Both	21/03/2024	38	21/03/2024	38	19/04/2024	67
293.	C231037589752	18/10/2023	18/10/2023	Digital Block	U	N/A	22/12/2023	65	15/04/2024	180
294.	C240238615277	5/02/2024	5/02/2024	Both	14/04/2024	69	2/07/2024	148	23/05/2024	108
295.	C240138444531	18/01/2024	18/01/2024	Digital Block	15/02/2024	28	5/07/2024	169	21/05/2024	124
296.	C240138468467	19/01/2024	19/01/2024	Both	U	N/A	24/06/2024	157	26/06/2024	159
297.	C240338858513	6/03/2024	6/03/2024	Digital Block	0705/2024		13/06/2024	99	2/06/2024	88
298.	C230836938561	31/08/2023	31/08/2023	Digital Block	16/07/2024	320	N/A	N/A	26/06/2024	300
299.	C231037366427	6/10/2023	6/10/2023	Account	13/06/2024	251	17/05/2024	224	24/05/2024	231
300.	C231137773997	8/11/2023	8/11/2023	Digital Block	9/01/2024	62	20/07/2024	255	1/06/2024	206
301.	C240138334813	10/01/2024	10/01/2024	Account	3/07/2024	175	21/02/2024	42	14/05/2024	125

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302.	C240238579147	3/02/2024	5/02/2024	Account	9/07/2024	155	8/07/2024	154	12/06/2024	130
303.	C231137899589	18/11/2023	20/11/2023	Account	15/07/2024	238	13/03/2024	114	9/05/2024	173
304.	C240138334830	10/01/2024	12/01/2024	Account	22/07/2024	192	16/07/2024	186	6/06/2024	148
305.	C240138257916	2/01/2024	3/01/2024	Account	18/07/2024	197	18/07/2024	197	1/05/2024	120
306.	C231238132884	14/12/2023	14/12/2023	Account	24/05/2024	162	23/05/2024	161	30/04/2024	138
307.	C240238692310	15/02/2024	15/02/2024	Account	30/07/2024	166	16/05/2024	91	18/06/2024	124
308.	C231137713648	2/11/2023	14/11/2023	Account	U	N/A	11/07/2024	240	25/06/2024	236
309.	C240138393314	13/01/2024	15/01/2024	Account	30/07/2024	197	2/04/2024	78	8/06/2024	147
310.	C231137890830	16/11/2023	17/11/2023	Account	13/06/2024	209	23/02/2024	98	23/05/2024	189
311.	C231238214780	20/12/2023	19/01/2024	Account	22/07/2024	185	29/05/2024	131	31/05/2024	163
312.	C231037598650	19/10/2023	19/10/2023	Account	U	N/A	16/02/2024	120	10/05/2024	204
313.	C230937270033	25/09/2023	26/09/2023	Account	27/06/2024	275	18/07/2024	296	28/06/2024	277
314.	C231037652121	22/10/2023	23/10/2023	Account	U	N/A	5/04/2024	165	30/05/2024	221
315.	C231238176668	18/12/2023	19/12/2023	Digital Block	1/05/2024	134	U	N/A	29/04/2024	133
316.	C231137888595	16/11/2023	16/11/2023	Digital Block	14/05/2024	180	14/05/2024	180	24/05/2024	190
317.	C230937098858	12/09/2023	12/09/2023	Account	N/A	N/A	19/01/2024	129	8/07/2024	300
318.	C231137941739	20/11/2023	20/11/2023	Digital Block	N/A	N/A	8/04/2024	140	24/06/2024	217
319.	C240238621549	7/02/2024	7/02/2024	Account	15/07/2024	159	17/05/2024	100	29/04/2024	82
320.	C240138417578	13/01/2024	13/01/2024	Digital Block	22/07/2024	191	18/04/2024	96	23/04/2024	101
321.	C240238574436	30/01/2024	30/01/2024	Both	U	N/A	27/03/2024	57	27/05/2024	118
322.	C230937285894	27/09/2023	3/10/2023	Digital Block	U	N/A	16/02/2024	136	1/06/2024	248
323.	C231037336721	1/10/2023	1/10/2023	Digital Block	22/07/2024	295	7/03/2024	158	6/05/2024	218
324.	C231238231023	22/12/2023	22/12/2023	Digital Block	22/07/2024	213	7/06/2024	168	19/06/2024	180
325.	C231037652404	23/10/2023	25/10/2023	Digital Block	U	N/A	8/01/2024	75	7/03/2024	136
326.	C240338919555	30/01/2024	30/01/2024	Digital Block	10/05/2024	101	8/05/2024	99	18/04/2024	79
327.	C240138263045	3/01/2024	3/01/2024	Digital Block	13/05/2024	131	12/07/2024	191	28/05/2024	146
328.	C231137979423	24/11/2023	24/11/2023	Account	U	N/A	21/03/2024	118	13/02/2024	81
329.	C240238566549	1/02/2024	1/02/2024	Digital Block	24/07/2024	174	18/07/2024	168	3/06/2024	123

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330.	C240238665087	13/02/2024	13/02/2024	Account	11/06/2024	119	11/06/2024	119	23/05/2024	100
331.	C240238739856	18/02/2024	18/02/2024	Digital Block	16/07/2024	149	16/07/2024	149	9/06/2024	112
332.	C240238665468	13/02/2024	13/02/2024	Digital Block	14/05/2024	91	15/05/2024	92	14/05/2024	91
333.	C240138441631	17/01/2024	17/01/2024	Digital Block	U	N/A	10/05/2024	114	22/05/2024	126
334.	C240138356501	11/01/2024	11/01/2024	Digital Block	U	N/A	6/03/2024	55	29/05/2024	139
335.	C231037663797	25/10/2023	26/10/2023	Account	U	N/A	14/03/2024	140	U	N/A
336.	C240238565938	31/01/2024	1/02/2024	Account	15/05/2024	104	24/05/2024	113	30/05/2024	120
337.	C240138495603	22/01/2024	23/01/2024	Account	19/07/2024	178	16/07/2024	175	23/05/2024	122
338.	C231037543852	22/09/2023	22/09/2023	Digital Block	24/05/2024	245	20/11/2023	59	24/05/2024	245
339.	C230937187877	19/09/2023	19/09/2023	Digital Block	U	N/A	16/02/2024	150	1/05/2024	225
340.	C231037704466	30/10/2023	30/10/2023	Digital Block	U	N/A	15/03/2024	137	8/05/2024	191
341.	C231037652167	22/10/2023	22/10/2023	Digital Block	18/06/2024	240	12/06/2024	234	8/05/2024	199
342.	C240138334666	10/01/2024	10/01/2024	Both	18/07/2024	190	12/07/2024	184	18/04/2024	99
343.	C240238685203	14/02/2024	14/02/2024	Digital Block	15/05/2024	91	8/07/2024	145	29/03/2024	44
344.	C240238618057	6/02/2024	7/02/2024	Account	U	N/A	14/03/2024	36	U	N/A
345.	C240238683957	14/02/2024	14/02/2024	Digital Block	4/07/2024	141	19/06/2024	126	22/05/2024	98
346.	C231037655330	23/10/2023	23/10/2023	Digital Block	U	N/A	15/03/2024	144	18/03/2024	147
347.	C231037344822	4/10/2023	4/10/2023	Digital Block	U	N/A	17/03/2024	165	11/04/2024	190
348.	C230937219520	21/09/2023	21/09/2023	Digital Block	U	N/A	20/11/2023	60	2/05/2024	224
349.	C231137888902	16/11/2023	16/11/2023	Account	28/06/2024	225	19/06/2024	216	30/05/2024	196
350.	C231238026986	2/12/2023	4/12/2023	Account	U	N/A	23/05/2024	171	1/05/2024	151
351.	C240439371594	30/04/2024	1/05/2024	Account	26/07/2024	86	13/06/2024	43	18/06/2024	49
352.	C231238052241	6/12/2023	6/12/2023	Account	U	N/A	29/05/2024	175	2/06/2024	179
353.	C231037676759	28/10/2023	30/10/2023	Account	U	N/A	6/12/2023	37	19/04/2024	174
354.	C230937288689	27/09/2023	27/09/2023	Digital Block	5/01/2024	100	20/11/2023	54	12/05/2024	228
355.	C231238218215	20/12/2023	20/12/2023	Account	U	N/A	28/06/2024	191	17/05/2024	149
356.	C231037357124	5/10/2023	5/10/2023	Digital Block	U	N/A	1/05/2024	209	1/05/2024	209
357.	C231238052159	6/12/2023	7/12/2023	Account	N/A	N/A	21/05/2024	166	7/05/2024	153

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358.	C240138418531	14/01/2024	15/01/2024	Account	19/07/2024	186	19/07/2024	186	18/06/2024	156
359.	C231137970063	22/11/2023	22/11/2023	Account	23/07/2024	244	9/07/2024	230	5/06/2024	196
360.	C231137899576	18/11/2023	20/11/2023	Account	23/07/2024	246	16/02/2024	88	12/04/2024	146
361.	C231238242192	27/12/2023	27/12/2023	Account	10/02/2024	45	12/02/2024	47	7/06/2024	163
362.	C240339077695	28/03/2024	28/03/2024	Account	U	N/A	24/06/2024	88	26/07/2024	120
363.	C240138357125	11/01/2024	11/01/2024	Account	23/04/2024	103	23/04/2024	103	5/06/2024	146
364.	C230937044704	10/09/2023	10/09/2023	Account	U	N/A	30/11/2023	81	25/07/2024	319
365.	C240138441566	17/01/2024	18/01/2024	Account	22/07/2024	186	18/07/2024	182	27/06/2024	162
366.	C231037652989	23/10/2023	23/10/2023	Account	8/07/2024	259	29/05/2024	219	8/06/2024	229
367.	C230937176877	18/09/2023	20/09/2023	Account	22/07/2024	306	20/06/2024	274	14/06/2024	270
368.	C240138417659	14/01/2024	15/01/2024	Account	30/07/2024	197	29/05/2024	135	24/05/2024	131
369.	C231138004022	26/11/2023	27/11/2023	Account	5/01/2024	39	27/03/2024	121	12/04/2024	138
370.	C231037704383	30/10/2023	30/10/2023	Digital Block	19/07/2024	263	30/11/2023	31	1/06/2024	215
371.	C231137855347	14/11/2023	14/11/2023	Digital Block	U	N/A	19/02/2024	97	15/05/2024	183
372.	C240138260825	3/01/2024	3/01/2024	Account	19/07/2024	198	27/03/2024	84	28/05/2024	146
373.	C240238621466	7/02/2024	7/02/2024	Account	10/05/2024	93	30/04/2024	83	7/05/2024	90
374.	C240238787869	23/02/2024	23/02/2024	Account	22/07/2024	150	21/03/2024	27	14/05/2024	81
375.	C240339031092	20/03/2024	20/03/2024	Account	U	N/A	28/06/2024	100	2/06/2024	74
376.	C240238652791	10/02/2024	12/02/2024	Account	22/07/2024	161	22/03/2024	39	9/06/2024	120
377.	C240138357538	11/01/2024	11/01/2024	Account	U	N/A	26/04/2024	106	2/06/2024	143
378.	C240739970941	16/07/2024	23/07/2024	Account	U	N/A	U	N/A	20/08/2024	35
379.	C240740010378	21/07/2024	21/07/2024	Digital Block	9/09/2024	50	11/09/2024	52	19/09/2024	60
380.	C240740029607	26/07/2024	26/07/2024	Account	U	N/A	U	N/A	U	N/A
381.	C240840094541	6/08/2024	6/08/2024	Digital Block	19/09/2024	44	U	N/A	19/09/2024	44
382.	C240840183503	13/08/2024	13/08/2024	Both	U	N/A	U	N/A	17/09/2024	35
383.	C240840199458	15/08/2024	15/08/2024	Digital Block	27/09/2024	43	8/10/2024	54	27/09/2024	43
384.	C231137976195	23/11/2023	23/11/2023	Digital Block	U	N/A	29/04/2024	158	29/04/2024	158
385.	C240138555035	20/01/2024	20/01/2024	Digital Block	19/07/2024	181	19/07/2024	181	22/05/2024	123

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386.	C230836616885	1/08/2023	1/08/2023	Digital Block	U	N/A	U	N/A	26/02/2024	209
387.	C230335092680	7/03/2023	7/03/2023	Digital Block	14/07/2023	129	24/04/2023	48	18/07/2023	133
388.	C230535709064	13/02/2023	13/02/2023	Digital Block	6/06/2023	113	6/06/2023	113	6/06/2023	113
389.	C230636135902	9/06/2023	9/06/2023	Account	2/08/2023	54	2/08/2023	54	11/09/2023	94
390.	C230736423251	11/07/2023	11/07/2023	Digital Block	25/09/2023	76	24/10/2023	105	24/10/2023	105
391.	C230535933195	11/05/2023	11/05/2023	Account	U	N/A	19/02/2024	284	6/03/2024	300
392.	C230535933729	19/05/2023	19/05/2023	Both	21/08/2023	94	2/08/2023	75	21/08/2023	94
393.	C230536032424	30/05/2023	30/05/2023	Digital Block	22/08/2023	84	17/08/2023	79	11/09/2023	104
394.	C230535713333	3/05/2023	3/05/2023	Digital Block	27/07/2023	85	27/07/2023	85	28/07/2023	86
395.	C230636086761	6/06/2023	6/06/2023	Both	U	N/A	26/02/2024	265	27/02/2024	266
396.	C230636110127	7/06/2023	7/06/2023	Digital Block	22/09/2023	107	18/08/2023	72	22/09/2023	107
397.	C231037404888	8/10/2023	8/10/2023	Account	16/04/2024	191	18/04/2024	193	15/04/2024	190
398.	C230736574743	23/07/2023	23/07/2023	Digital Block	U	N/A	10/10/2023	79	18/10/2023	87
399.	C240238579154	3/02/2024	4/02/2024	Digital Block	U	N/A	U	N/A	15/05/2024	102
400.	C230335355766	28/03/2023	28/03/2023	Account	U	N/A	U	N/A	21/04/2023	24
401.	C230636319007	27/06/2023	27/06/2023	Digital Block	3/10/2023	98	25/08/2023	59	3/10/2023	98
402.	C230535894177	16/05/2023	16/05/2023	Digital Block	3/08/2023	79	3/08/2023	79	3/08/2023	79
403.	C230535993805	25/05/2023	U	U	21/08/2023		3/08/2023	N/A	21/08/2023	88
404.	C230836899823	23/08/2023	23/08/2023	Digital Block	U	N/A	17/05/2024	268	14/03/2024	204
405.	C230335201467	16/03/2023	16/03/2023	Digital Block	U	N/A	U	N/A	6/04/2024	387
406.	C230636275400	24/06/2023	24/06/2023	Digital Block	14/11/2023	143	14/09/2023	82	14/11/2023	143
407.	C231238052244	6/12/2023	6/12/2023	Both	6/04/2024	122	16/04/2024	132	6/04/2024	122
408.	C230636299830	26/06/2023	27/06/2023	Account	U	N/A	18/09/2023	83	19/09/2023	85
409.	C230937211780	20/09/2023	20/09/2023	Digital Block	U	N/A	20/11/2023	61	19/03/2024	181
410.	C230636327556	29/06/2023	29/06/2023	Digital Block	14/11/2023	138	8/11/2023	132	14/11/2023	138
411.	C230736342098	3/07/2023	3/07/2023	Digital Block	18/09/2023	77	24/08/2023	52	18/09/2023	77
412.	C230836848540	17/08/2023	17/08/2023	Both	U	N/A	20/09/2023	34	14/03/2024	210
413.	C230937046323	11/09/2023	11/09/2023	Digital Block	26/04/2024	228	20/11/2023	70	2/04/2024	204

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414.	C240639608253	4/06/2024	4/06/2024	Digital Block	U	N/A	U	N/A	16/07/2024	42
415.	C240539581949	29/05/2024	29/05/2024	Digital Block	25/07/2024	57	5/07/2024	37	31/05/2024	2
416.	C231238178054	18/12/2023	18/12/2023	Account	U	N/A	2/02/2024	46	8/02/2024	52
417.	C231138015200	27/11/2023	27/11/2023	Digital Block	25/07/2024	241	U	N/A	18/07/2024	234
418.	C230636323491	28/06/2023	28/06/2023	Account	U	N/A	U	N/A	11/06/2024	349
419.	C230736410958	9/07/2023	9/07/2023	Digital Block	U	N/A	U	N/A	18/07/2024	375
420.	C231138015389	29/11/2023	29/11/2023	Account	U	N/A	15/01/2024	47	20/05/2024	173
421.	C230134676895	24/01/2023	30/01/2023	Account	U	N/A	27/03/2023	56	27/03/2023	62
422.	C230335374124	31/03/2023	7/06/2023	Account	U	N/A	U	N/A	13/06/2023	74
423.	C221033664190	19/10/2022	19/10/2022	Digital Block	U	N/A	8/12/2022	50	28/03/2023	160
424.	C220732609099	9/07/2022	11/07/2022	Digital Block	2/09/2022	53	2/09/2022	53	23/09/2022	76
425.	C230836888958	20/08/2023	20/08/2023	Both	U	N/A	22/12/2023	124	8/04/2024	232
426.	C230636319276	27/06/2023	27/06/2023	Both	U	N/A	U	N/A	29/02/2024	247
427.	C231037590750	18/10/2023	18/10/2023	Account	U	N/A	U	N/A	6/12/2023	49
428.	C231138019379	30/11/2023	30/11/2023	Account	U	N/A	U	N/A	12/04/2024	134
429.	C230636169397	13/06/2023	13/06/2023	Digital Block	18/07/2023	35	23/08/2023	71	24/07/2023	41
430.	C231238239739	25/12/2023	27/12/2023	Both	U	N/A	15/08/2024	232	26/06/2024	184
431.	C221033548748	10/10/2022	10/10/2022	Digital Block	U	N/A	U	N/A	21/03/2023	162
432.	C220532029846	22/03/2022	20/05/2022	Account	U	N/A	U	N/A	1/07/2022	101
433.	C230636299588	26/06/2023	27/06/2023	Account	U	N/A	25/07/2023	28	12/04/2024	291
434.	C231037462379	5/10/2023	6/11/2023	Account	U	N/A	10/01/2024	65	22/01/2024	109
435.	C230435421080	8/04/2023	8/04/2023	Digital Block	U	N/A	20/11/2023	226	U	N/A
436.	C220832915421	10/08/2022	10/08/2022	Account	N/A	N/A	N/A	N/A	11/10/2022	62
437.	C220933363850	19/09/2022	19/09/2022	Both	U	N/A	U	N/A	U	N/A
438.	C220732681284	16/07/2022	18/07/2022	Both	U	N/A	2/09/2022	46	2/09/2022	48
439.	C220732770981	21/07/2022	21/07/2022	Both	24/08/2022	34	24/08/2022	34	5/09/2022	46
440.	C221033546916	8/10/2022	8/10/2022	Digital Block	U	N/A	6/12/2022	59	24/01/2023	108
441.	C220331273798	24/03/2022	24/03/2022	Both	U	N/A	U	N/A	4/04/2022	11

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442.	C220632266520	14/06/2022	14/06/2022	Digital Block	U	N/A	8/07/2022	24	19/07/2022	35
443.	C220431359132	4/03/2022	4/03/2022	Account	U	N/A	U	N/A	U	N/A
444.	C231238050591	5/12/2023	5/12/2023	Account	31/05/2024	178	31/05/2024	178	U	N/A
445.	C220230622082	2/02/2022	2/02/2022	Account	U	N/A	U	N/A	17/02/2022	15
446.	C220933431821	21/09/2022	21/10/2022	Both	U	N/A	U	N/A	25/11/2022	65
447.	C230836907428	25/08/2023	25/08/2023	Digital Block	14/05/2024	263	13/06/2024	293	14/04/2024	233
448.	C230836909951	26/08/2023	26/08/2023	Both	14/11/2023	80	20/11/2023	86	8/01/2024	135
449.	C231137975182	23/11/2023	23/11/2023	Digital Block	U	N/A	U	N/A	25/06/2024	215
450.	C230234905892	16/02/2023	16/02/2023	Account	N/A	N/A	N/A	N/A	31/03/2023	43
451.	C230234784286	7/02/2023	7/02/2023	Account	N/A	N/A	3/04/2023	55	12/04/2023	64
452.	C230435394993	4/04/2023	4/04/2023	Both	N/A	N/A	7/06/2023	64	3/07/2023	90
453.	C230134673468	23/01/2023	23/01/2023	Digital Block	N/A	N/A	29/03/2023	65	31/03/2023	67
454.	C230435628689	19/04/2023	19/04/2023	Digital Block	U	N/A	11/07/2023	83	14/11/2023	209
455.	C230535749955	5/05/2023	5/05/2023	Digital Block	U	N/A	U	N/A	24/07/2023	80
456.	C230736501725	17/07/2023	25/07/2023	Account	U	N/A	29/02/2024	219	U	N/A
457.	C230836859663	15/08/2023	18/08/2023	Account	U	N/A	20/11/2023	94	U	N/A
458.	C230736613994	31/07/2023	31/07/2023	Digital Block	U	N/A	28/09/2023	59	U	N/A
459.	C240138284533	5/01/2024	23/01/2024	Both	U	N/A	U	N/A	9/07/2024	186
460.	C231037661570	25/10/2023	25/10/2023	Digital Block	21/02/2024	119	21/02/2024	119	23/04/2024	181
461.	C230736435291	12/07/2023	12/07/2023	Both	U	N/A	22/11/2023	133	7/05/2024	300
462.	C231238025936	1/12/2023	1/12/2023	Account	9-May-24	160	27/05/2024	178	22/02/2024	83
463.	C230636209577	16/06/2023	16/06/2023	Digital Block	12/03/2024	270	28/02/2024	257	12/03/2024	270
464.	C240238695151	15/02/2024	16/02/2024	Account	U	N/A	28/05/2024	102	2/05/2024	77
465.	C230836633301	3/08/2023	3/08/2023	Digital Block	U	N/A	3/10/2023	61	7/03/2024	217
466.	C231037347901	5/10/2023	29/01/2024	Account	21-Jul-24	174	23/07/2024	176	U	N/A
467.	C231137981665	1/12/2023	22/01/2024	Account	31-May-24	130	3/06/2024	133	31/05/2024	182
468.	C230636074476	5/06/2023	5/06/2023	Digital Block	U	N/A	12/06/2024	373	29/04/2024	329
469.	C230836621456	2/08/2023	2/08/2023	Digital Block	U	N/A	22/09/2023	51	6/04/2024	248

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470.	C240238579152	3/02/2024	5/02/2024	Account	U	N/A	14/06/2024	130	U	N/A
471.	C231137947785	20/11/2023	20/11/2023	Account	U	N/A	2/02/2024	74	11/03/2024	112
472.	C230836653320	5/08/2023	7/08/2023	Digital Block	23/07/2024	351	16/12/2023	131	18/06/2024	318
473.	C230736611193	29/07/2023	28/08/2023	Account	U	N/A	16/02/2024	172	3/06/2024	310
474.	C240238781089	23/02/2024	23/02/2024	Account	U	N/A	26/03/2024	32	27/03/2024	33
475.	C230836705035	10/08/2023	6/09/2023	Account	13/06/2024	281	20/11/2023	75	28/05/2024	292
476.	C230736601574	26/07/2023	26/07/2023	Account	U	N/A	19/03/2024	237	27/02/2024	216
477.	C230937237064	23/09/2023	23/09/2023	Digital Block	5/03/2024	164	17/09/2024	360	27/02/2024	157
478.	C230736605654	27/07/2023	27/07/2023	Digital Block	25/04/2024	273	N/A	N/A	15/03/2024	232
479.	C230636221199	19/06/2023	23/06/2023	Account	7/05/2024	319	U	N/A	26/04/2024	312
480.	C231037375018	7/10/2023	7/10/2023	Digital Block	24/01/2024	109	17/05/2024	223	12/03/2024	157
481.	C240238621808	7/02/2024	9/02/2024	Account	15/05/2024	96	15/03/2024	35	6/06/2024	120
482.	C230836909913	26/08/2023	U	U	9/02/2024		16/02/2024	N/A	2/06/2024	281
483.	C220833125951	30/08/2022	N/A	N/A	6/05/2024		21/10/2022	N/A	31/01/2023	154
484.	C230736601223	26/07/2023	26/07/2023	Account	12/06/2024	322	16/05/2024	295	20/06/2024	330
485.	C231037344585	4/10/2023	4/10/2023	Digital Block	15/02/2024	134	30/06/2024	270	20/06/2024	260
486.	C230636210273	17/06/2023	19/06/2023	Both	23/01/2024	218	20/11/2023	154	11/03/2024	268
487.	C230836653349	5/08/2023	5/08/2023	both	14/05/2024	283	10/07/2024	340	8/05/2024	277
488.	C230836653417	5/08/2023	5/08/2023	Digital Block	20/10/2023	76	7/09/2023	33	17/06/2024	317
489.	C231138016789	29/11/2023	29/11/2023	Digital Block	5/01/2024	37	16/02/2024	79	15/05/2024	168
490.	C230736368153	6/07/2023	6/07/2023	Both	N/A	N/A	16/02/2024	225	19/05/2024	318
491.	C231238085810	9/12/2023	9/12/2023	Digital Block	18/07/2024	222	17/07/2024	221	7/06/2024	181
492.	C231238085416	9/12/2023	9/12/2023	Digital Block	N/A	N/A	19/02/2024	72	25/04/2024	138
493.	C230736339191	2/07/2023	11/07/2023	Digital Block	N/A	N/A	17/04/2024	281	29/02/2024	242
494.	C231138004813	27/11/2023	27/11/2023	Digital Block	15/07/2024	231	15/07/2024	231	23/05/2024	178
495.	C231238046525	4/12/2023	4/12/2023	Account	9/07/2024	218	8/07/2024	217	29/05/2024	177
496.	C231238236766	23/12/2023	27/12/2023	Account	U	N/A	30/05/2024	155	U	N/A
497.	C231137972021	22/11/2023	22/11/2023	Both	1/02/2024	71	21/06/2024	212	14/05/2024	174

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498.	C231138012918	28/11/2023	28/11/2023	Digital Block	22/07/2024	237	17/07/2024	232	18/04/2024	142
499.	C231238223854	21/12/2023	27/12/2023	Both	22/07/2024	208	5/07/2024	191	3/06/2024	165
500.	C230636046171	2/06/2023	2/06/2023	Digital Block	U	N/A	22/11/2023	173	6/12/2023	187
501.	C230736340364	3/07/2023	3/07/2023	Both	U	N/A	6/11/2023	126	14/05/2024	316
502.	C230636270922	23/06/2023	23/06/2023	Digital Block	19/06/2024	362	19/06/2024	362	6/06/2024	349
503.	C240238685569	14/02/2024	15/02/2024	Account	15/05/2024	90	23/07/2024	159	8/06/2024	115
504.	C231238128382	13/12/2023	13/12/2023	Account	U	N/A	21/02/2024	70	10/06/2024	180
505.	C231037554363	14/10/2023	16/10/2023	Account	U	N/A	5/12/2023	50	23/05/2024	222
506.	C231137970117	17/11/2023	20/11/2023	Account	U	N/A	8/02/2024	80	21/06/2024	217
507.	C230736599149	25/07/2023	3/08/2023	Account	U	N/A	20/11/2023	109	21/06/2024	332
508.	C231138019699	30/11/2023	30/11/2023	Account	28/06/2024	211	16/02/2024	78	26/04/2024	148
509.	C230536035940	31/05/2023	1/06/2023	Digital Block	U	N/A	5/12/2023	187	24/06/2024	390
510.	C230836892861	22/08/2023	22/08/2023	Digital Block	U	N/A	22/05/2024	274	28/02/2024	190
511.	C231037704006	30/10/2023	30/10/2023	Account	22/03/2024	144	N/A	N/A	23/11/2023	24
512.	C231238071074	8/12/2023	8/12/2023	Account	U	N/A	16/02/2024	70	29/05/2024	173
513.	C231238049128	5/12/2023	5/12/2023	both	12/06/2024	190	4/07/2024	212	6/06/2024	184
514.	C230636074866	5/06/2023	5/06/2023	Digital Block	U	N/A	11/07/2023	36	18/10/2023	135
515.	C230836676820	7/08/2023	7/08/2023	Account	22/07/2024	350	11/07/2024	339	8/06/2024	306
516.	C240238614205	4/02/2024	5/02/2024	Account	30/05/2024	115	1/07/2024	147	1/06/2024	118
517.	C230736602488	15/07/2023	27/07/2023	Account	U	N/A	16/02/2024	204	17/05/2024	307
518.	C230836787495	15/08/2023	7/09/2023	Account	N/A	N/A	N/A	N/A	20/06/2024	310
519.	C231138019468	30/11/2023	30/11/2023	Account	1/05/2024	153	18/07/2024	231	30/04/2024	152
520.	C231238050050	5/12/2023	5/12/2023	Digital Block	22/07/2024	230	22/04/2024	139	29/05/2024	176
521.	C231138017473	29/11/2023	29/11/2023	Digital Block	19/07/2024	233	18/07/2024	232	21/06/2024	205
522.	C231238070768	8/12/2023	8/12/2023	Digital Block	U	N/A	10/05/2024	154	7/06/2024	182
523.	C240138495505	22/01/2024	22/01/2024	Digital Block	U	N/A	22/04/2024	91	23/05/2024	122
524.	C230836761130	14/08/2023	14/08/2023	Digital Block	U	N/A	19/07/2024	340	10/06/2024	301
525.	C231137976692	23/11/2023	23/11/2023	Account	22/07/2024	242	28/06/2024	218	14/05/2024	173

Row	(a) UCM reference	(b) Date HBAU received UAR	(c) Date Customer's account was blocked or restricted by HBAU	(d) Nature of restrictions (Account Restriction, Digital Block, or Both)	(e) Date HBAU notified Customer of process to reinstate account access	(f) Number of days taken for HBAU to notify Customer of process to reinstate account access	(g) Date HBAU reinstated Digital Access and removed Account Restrictions	(h) Number of days for Digital Access reinstatement and Account Restrictions removed	(i) Date HBAU completed its Investigation	(j) Number of days taken to complete Investigation
526.	C231238049256	5/12/2023	5/12/2023	Both	22/07/2024	230	21/05/2024	168	17/04/2024	134
527.	C230836752650	13/08/2023	13/08/2023	Digital Block	6/06/2024	298	23/07/2024	345	6/06/2024	298
528.	C230836621041	2/08/2023	2/08/2023	Digital Block	U	N/A	23/02/2024	205	30/04/2024	272
529.	C230936989960	5/09/2023	5/09/2023	Account	22/07/2024	321	U	N/A	19/06/2024	288
530.	C231037652664	23/10/2023	23/10/2023	Digital Block	U	N/A	22/11/2023	30	26/06/2024	247
531.	C231137971821	22/11/2023	22/11/2023	Digital Block	4/04/2024	134	4/04/2024	134	14/05/2024	174
532.	C231137963075	20/11/2023	20/11/2023	Account	U	N/A	8/02/2024	80	16/05/2024	178
533.	C230535804284	10/05/2023	10/05/2023	Digital Block	3/06/2023	24	13/11/2023	187	4/12/2023	208
534.	C231238247429	28/12/2023	28/12/2023	Digital Block	U	N/A	26/02/2024	60	20/05/2024	144
535.	C230937303441	29/09/2023	29/09/2023	Digital Block	U	N/A	30/05/2024	244	28/06/2024	273
536.	C240238803118	2/10/2023	2/10/2023	Account	13/03/2024	163	13/03/2024	163	4/03/2024	154
537.	C231238052049	6/12/2023	6/12/2023	Account	U	N/A	16/02/2024	72	3/05/2024	149
538.	C231037364974	6/10/2023	11/10/2023	Account	U	N/A	16/02/2024	128	4/06/2024	242
539.	C230535842457	12/05/2023	12/05/2023	Account	U	N/A	7/12/2023	209	17/06/2024	402
540.	C240539382696	10/02/2024	15/02/2024	Account	N/A	N/A	13/08/2024	180	9/08/2024	181
541.	C240238787869	23/02/2024	23/02/2024	Account	22/07/2024	150	21/03/2024	27	14/05/2024	81
542.	C240840199599	15/08/2024	15/08/2024	Both	7/10/2024	53	16/10/2024	62	6/09/2024	22

### Schedule I

# Systemic issues in back to banking

Period	Number of UARs received by HBAU	Percentage of UARs with Account Restrictions and/or Digital Blocks	Percentage of Blocked Customers HBAU took over 21 days to notify of process to reinstate account access and use of accounts	Mean number of days for HBAU to advise Customer of process to reinstate full access and use of accounts	Percentage of Blocked Customers HBAU took over 21 days to reinstate full access and use of accounts	Mean number of days for HBAU to reinstate full access and use of accounts	Percentage of Blocked Customers HBAU did not reinstate access or notify of process to reinstate access within 21 days
Jan 2020	1	100%	0%	12	0%	12	0%
Feb 2020	4	100%	75%	18	75%	273	100%
Mar 2020	0						
Apr 2020	0						
May 2020	3	100%	100%	72	100%	212	100%
Jun 2020	4	100%	100%	22	100%	320	100%
Jul 2020	1	100%	0%	1	0%	1	0%
Aug 2020	3	67%	50%	15	50%	159	50%
Sep 2020	2	100%	50%	11	0%	16	50%
Oct 2020	7	86%	100%	64	100%	219	100%
Nov 2020	2	100%	100%	25	0%	21	100%
Dec 2020	5	100%	80%	18	80%	273	80%

Period	Number of UARs received by HBAU	Percentage of UARs with Account Restrictions and/or Digital Blocks	Percentage of Blocked Customers HBAU took over 21 days to notify of process to reinstate account access and use of accounts	Mean number of days for HBAU to advise Customer of process to reinstate full access and use of accounts	Percentage of Blocked Customers HBAU took over 21 days to reinstate full access and use of accounts	Mean number of days for HBAU to reinstate full access and use of accounts	Percentage of Blocked Customers HBAU did not reinstate access or notify of process to reinstate access within 21 days
Total 2020	32	94%	80%	33	70%	165	83%
Jan 2021	5	80%	100%	22	100%	183	100%
Feb 2021	4	100%	75%	25	100%	259	100%
Mar 2021	2	100%	100%	22	100%	81	100%
Apr 2021	3	100%	67%	26	33%	23	67%
May 2021	2	100%	50%	13	100%	109	100%
Jun 2021	2	100%	100%	22	100%	182	100%
Jul 2021	2	100%	50%	51	100%	64	100%
Aug 2021	1	100%	0%	3	100%	97	100%
Sep 2021	4	100%	75%	25	75%	67	75%
Oct 2021	3	100%	67%	32	67%	69	67%
Nov 2021	3	100%	67%	15	0%	22	67%
Dec 2021	4	100%	50%	12	25%	23	50%
Total 2021	35	97%	71%	23	71%	105	82%
Jan 2022	3	100%	67%	21	0%		67%

Period	Number of UARs received by HBAU	Percentage of UARs with Account Restrictions and/or Digital Blocks	Percentage of Blocked Customers HBAU took over 21 days to notify of process to reinstate account access and use of accounts	Mean number of days for HBAU to advise Customer of process to reinstate full access and use of accounts	Percentage of Blocked Customers HBAU took over 21 days to reinstate full access and use of accounts	Mean number of days for HBAU to reinstate full access and use of accounts	Percentage of Blocked Customers HBAU did not reinstate access or notify of process to reinstate access within 21 days
Feb 2022	1	100%	100%	22	0%	22	100%
Mar 2022	6	100%	83%	21	0%	16	83%
Apr 2022	4	100%	75%	19	0%	6	75%
May 2022	2	100%	100%	22	50%	173	100%
Jun 2022	1	100%	100%	22	100%	24	100%
Jul 2022	6	100%	100%	145	50%	26	100%
Aug 2022	6	33%	50%	22	0%		100%
Sep 2022	4	75%	67%	21	33%	54	100%
Oct 2022	6	100%	67%	109	67%	51	100%
Nov 2022	4	25%	0%		0%		0%
Dec 2022	1	100%	100%	22	0%	1	100%
Total 2022	44	82%	78%	57	28%	32	89%
Jan 2023	5	60%	33%	22	67%	43	67%
Feb 2023	5	80%	25%	62	50%	59	75%
Mar 2023	14	100%	86%	71	7%	10	86%

Period	Number of UARs received by HBAU	Percentage of UARs with Account Restrictions and/or Digital Blocks	Percentage of Blocked Customers HBAU took over 21 days to notify of process to reinstate account access and use of accounts	Mean number of days for HBAU to advise Customer of process to reinstate full access and use of accounts	Percentage of Blocked Customers HBAU took over 21 days to reinstate full access and use of accounts	Mean number of days for HBAU to reinstate full access and use of accounts	Percentage of Blocked Customers HBAU did not reinstate access or notify of process to reinstate access within 21 days
Apr 2023	5	80%	50%	15	75%	93	75%
May 2023	18	83%	87%	71	60%	103	93%
Jun 2023	34	94%	81%	82	53%	83	81%
Jul 2023	31	97%	73%	52	63%	101	90%
Aug 2023	35	94%	85%	112	70%	129	94%
Sep 2023	70	97%	76%	126	74%	114	93%
Oct 2023	103	99%	98%	130	75%	104	99%
Nov 2023	104	100%	87%	112	61%	101	94%
Dec 2023	80	99%	76%	98	66%	92	92%
Total 2023	504	97%	83%	107	65%	86	93%
Jan 2024	117	100%	75%	76	71%	82	93%
Feb 2024	102	99%	84%	69	70%	70	92%
Mar 2024	33	100%	55%	20	30%	30	67%
Apr 2024	10	100%	80%	57	10%	9	80%
May 2024	9	89%	63%	43	25%	13	63%

Period	Number of UARs received by HBAU	Percentage of UARs with Account Restrictions and/or Digital Blocks	Percentage of Blocked Customers HBAU took over 21 days to notify of process to reinstate account access and use of accounts	Mean number of days for HBAU to advise Customer of process to reinstate full access and use of accounts	Percentage of Blocked Customers HBAU took over 21 days to reinstate full access and use of accounts	Mean number of days for HBAU to reinstate full access and use of accounts	Percentage of Blocked Customers HBAU did not reinstate access or notify of process to reinstate access within 21 days
Jun 2024	5	100%	80%	25	0%	12	80%
Jul 2024	10	40%	100%	29	50%	33	100%
Aug 2024	6	100%	67%	27	33%	30	67%
Total 2024	292	97%	76%	63	60%	35	88%
TOTAL 2020 - 2024	907	96%	80%	85	62%	95	90%

### Schedule J

# Glossary

#	Term	Definition	First ref
1.	Account Restrictions	Restrictions to transactions on the Customer's Loan account or Deposit account (or both).	[58(a)]
2.	Account Takeover	Where a third party claims to be a legitimate account holder and changes, by deception, static data. This may facilitate gaining access to the account, prevent the genuine customer accessing the account, or prevent the genuine customer being alerted to fraudulent transactions. A successful Account Takeover attack leads to fraudulent transactions being made on the account.	[9] Particular 4
3.	ACL	Australian Credit Licence	[2(c)]
4.	ADI	An authorised deposit taking institution for the purposes of the <i>Banking Act 1959</i> (Cth).	[2(g)]
5.	AFSL	Australian Financial Services Licence	[2(c)]
6.	ASIC	Australian Securities and Investments Commission (Plaintiff)	[1]
7.	ASIC Act	Australian Securities and Investments Commission Act 2001 (Cth)	[1(a)]
8.	ΑΤΟ	Account Takeover	[9] Particular 4
9.	Banking Code	Banking Code of Practice - the Australian Banking Association's code of conduct which sets the standards of good banking practice and service for banks, including HSBC Australia, to follow when dealing with individual and small business customers.	[2(k)]
10.	BioCatch	Digital fraud behavioural biometrics software.	[27(a)(i)] Particular 1
11.	Blocked Customers	Customers in respect of whom HSBC Australia applied an Account Restriction or a Digital Block (or both) of the nature referred to in column (d) of Schedule H in respect of the Customer(s) identified by the UCM system reference number in column (a) of Schedule H.	[63]
12.	Booklet	HSBC Personal Banking Booklet issued by HSBC Australia which formed part of its agreement with its Customers in respect of: (a) Deposit accounts and Loan accounts (among other products); and	[19]
		(b) Digital Access services (among other services).	

#	Term	Definition	First ref
13.	Compromise Point Unknown	Where fraudsters use compromised credentials to access customer accounts to make fraudulent payments, but the method used to compromise the credentials is unknown.	[9] Particular 3(e)
14.	Corporations Act	Corporations Act 2001 (Cth)	[2(d)]
15.	Credit Act	National Consumer Credit Protection Act 2009 (Cth)	[2(f)]
16.	Customers	HSBC Australia account holders in its WPB business.	[5]
17.	Deposit accounts	Financial products, including transaction, offset, savings, and term deposit accounts.	[5(a)]
18.	Digital Access	Access to Customers' Online Banking or Mobile Banking (or both).	[9(a)]
19.	Digital Block	Block of the Customer's access to Online Banking or Mobile Banking (or both).	[58(b)]
20.	EFM	Enterprise fraud management transaction monitoring software system.	[27(c)]
21.	ePayments Code	A code of practice, which regulates electronic payments, including ATM, EFTPOS and credit card transactions, online payments, internet and mobile banking, and BPAY. Banks and other providers of electronic payment facilities to consumers can subscribe to the Code.	[13] Particular 1
22.	Extra Time Request	Where HSBC Australia advised the UAR Customer in writing of the need for more time to complete its Investigation.	[52(a)(ii)]
23.	facility	Defined in the ePayments Code to mean an arrangement through which a person can perform transactions.	[15] Particular 5
24.	FC-UARs	Financial Crime – Unusual Activity Report, in which reports of unauthorised transactions from Customers were recorded by HSBC Australia staff members.	[30] Particular
25.	FCI	Financial Crime Investigations	[31(a)]
26.	FCMI	Financial Crime Investigations Major Investigations. One of two main teams involved in investigating unauthorised transactions and preparing information for any reporting of outcomes to Customers.	[31(a)]
27.	FIM	Fraud Investigations Management. One of two main teams involved in investigating unauthorised transactions and preparing information for any reporting of outcomes to Customers.	[31(a)] Particular
28.	FIM Fraud Investigation	Takeover Certificate for Fraud Typologies (AUH Financial Crime Investigations (FCI) Major Investigations to AUH WPB CCS	[31(c)] Particular

#	Term	Definition	First ref
	Takeover Certificate	(Onshore Fraud Investigation Management (FIM) Team)) Australia.	
29.	Fraud Classification and Reporting Standard	HSBC Group's Fraud Classification and Reporting Standard dated 24 November 2020 [BCB.1000.0001.0252] which was updated from time to time.	[9] Particular 1(a)
30.	HBAU	HSBC Bank Australia Limited (ACN 006 434 162) (Defendant)	[2]
31.	holder	Defined in the ePayments Code to mean an individual in whose name a facility has been established, or to whom a facility has been issued.	[15] Particular 4
32.	HSBC Australia	HSBC Bank Australia Limited (ACN 006 434 162) (Defendant)	[2]
33.	HSBC Group	HSBC Holdings plc and its subsidiaries.	[2(i)]
34.	Impersonation	Where a third party has pretended to be an HSBC Australia staff member, compromised the Customer's account and made Unauthorised Payments out of the Customer's account.	[9] Particular 5
35.	Investigation	Investigation of a UAR	[52(a)(i)]
36.	Investigation Outcome	Where HSBC Australia advises a UAR Customer in writing of the outcome of their Investigation.	[52(a)(i)]
37.	Liability Rules	Rules contained in the ePayments Code for the allocation of liability for losses arising from unauthorised transactions.	[14]
38.	Loan accounts	Credit contracts, including home loans, personal loans and credit card accounts.	[5(b)]
39.	Malware	Where a fraudster installs malicious software to harvest sensitive information, such as login credentials, and uses these details to make fraudulent payments from customer accounts.	[9] Particular 3(d)
40.	Mobile Banking	Where Customers can make and receive payments, including to third parties using mobile banking through an HSBC-branded mobile banking application on a mobile device.	[8(b)]
41.	money mule	An account where the account holder is an identified customer of HSBC Australia, but the customer has allowed or facilitated another person to use their account for pass-through activity.	Schedule A Part A [3]
42.	National Credit Code	Schedule 1 to the National Consumer Credit Protection Act 2009 (Cth).	[4(a)]
43.	NPP	New Payment Platform, also known as Fast Payments.	[11(a)(iii)]
44.	Online Banking	Where Customers can make and receive payments, including to third parties, using online banking through an Internet browser.	[8(a)]
45.	Payment Fraud	A phrase also used by HSBC Australia to refer to Unauthorised Payments.	[10] Particular 2

#	Term	Definition	First ref
46.	pass-through	Where an account is opened using stolen or false identification and the person operating the account in someone else's name utilises it for the purpose of receiving and forwarding proceeds of fraud to another financial institution.	Schedule A Part A [1]
47.	Relevant Period	1 January 2020 to 30 November 2024	[2]
48.	Remote Access	Where a fraudster socially engineers a customer to give them remote control over their computer or device, and to login to their Online Banking or Mobile Banking. Once logged in, the fraudster uses the remote access to make fraudulent payments.	[9] Particular 3(c)
49.	Scam	A term also used, by HSBC Australia, in some contexts, to refer to Unauthorised Payments.	[10] Particular 3
50.	SLA	HSBC Group's expected timelines in respect of the investigation of unauthorised transactions and reporting outcomes to Customers.	[33(a)]
51.	Smishing	Where a fraudster socially engineers a customer into revealing sensitive information such as Online Banking or Mobile Banking login credentials via a text/SMS message, with the purpose of making unauthorised fraudulent payment(s) from customer accounts.	[9] Particular 3(b)
52.	ThreatMetrix	LexisNexis digital fraud device identification software.	[27(a)(ii)] Particular 1
53.	Token Reactivation	Where a fraudster socially engineers a customer to provide token reactivation codes which enable the fraudster to link their device to the Customer's account and make fraudulent Unauthorised Payment(s).	[9] Particular 3(a)
54.	UAR	Where HSBC Australia received from a Customer a report of one or more unauthorised transactions.	[48]
55.	UAR Customers	Customer(s) who made a report of one or more unauthorised transactions who are identified by the UCM system reference number in column (a) of Schedule F.	[48]
56.	UCM	Unified case management system for fraud cases.	[30] Particular
57.	Unauthorised Payments	<ul> <li>Where third-parties, through forgery or account compromise (including by social engineering):</li> <li>(a) obtain Digital Access; and</li> <li>(b) make payment(s) from the Customers' Deposit accounts or Loan accounts (or both) to unintended parties, without the Customer's authority.</li> </ul>	[9]
58.	unauthorised transaction	Defined in the ePayments Code as a 'transaction that is not authorised by a user'. The 2022 ePayments Code also stated as part of the definition: 'It does not include any transaction that is	[13] Particular 3

#	Term	Definition	First ref
		performed by a user themselves or by anyone who performs a transaction with the knowledge and consent of a user', which wording was also included in cl 9.1 of the 2016 ePayments Code.	
59.	user	Defined in the ePayments Code to mean a holder or an individual who is authorised by a subscriber and a holder to perform transactions using a facility held by the holder.	[15] Particular 3
60.	WPB	HSBC Australia's Wealth and Personal Banking business.	[5]
61.	2016 ePayments Code	ePayments Code effective 1 July 2012 amended 29 March 2016.	[13] Particular 1(a)
62.	2019 Banking Code	Banking Code of Practice 2019, commencing 1 July 2019.	[17] Particular (A)
63.	2020 Banking Code	Banking Code of Practice 1 March 2020 release, revised on 5 October 2021.	[17] Particular (B)
64.	2022 ePayments Code	ePayments Code effective 2 June 2022, with a transitional period requiring subscribers to comply with its provisions by 2 June 2023.	[13] Particular 1(b)