Part B Consultation Questions - Volatility Control Mechanism

Please indicate your preference by checking the appropriate boxes and provide reasons to support your views. Where there is insufficient space, please attach additional pages as necessary.

1.	Do you support the introduction of an instrument-level VCM based on a dynamic price limit model in Hong Kong?
	⊠ Yes
	□ No
	Please give reasons for your view.
	We are supportive of implementing an instrument-level VCM as it offers more protection to the entire system without too much compromise on liquidity. VCM will get the same companies which are dually listed on other exchange already having VCM in place to be traded under very similar practice.
2.	Do you agree that the proposed VCM model should only be applied to the HSI and HSCEI constituent stocks in the <u>securities</u> market?
	☐ Yes
	□ No
	Please give reasons for your view.
3.	Do you agree that the proposed VCM model should only be applied to the HSI, HHI, MHI & MCH (spot month and the next calendar month) index futures in the <u>derivatives</u> market?
	Yes
	□ No
	Please give reasons for your view.

	you agree that the market should have a 15-minute uninterrupted trading re the end of the last continuous trading?
	Yes
	No
Plea	se give reasons for your view.
	you agree with the proposed reference price for the securities market, name of last trade 5 minutes ago? If not, what would you prefer?
	Yes
	No, I would prefer:
Pleas	se give reasons for your view.
	ou agree with our proposed reference price for the derivatives market, name of last trade 5 minutes ago? If not, what would you prefer?
	Yes
	No, I would prefer:
	se give reasons for your view.

7. Do you agree with the proposed triggering level for the securities market, namely 10%

	what level would you prefer?
	☐ Yes
	No, level that I would prefer:
	Please give reasons for your view.
0	
8.	Do you agree with the proposed triggering level for the <u>derivatives</u> market, namely <u>5%</u> from the reference price across the proposed instruments covered by the VCM? If not what level would you prefer?
	☐ Yes
	No, level that I would prefer:
	Please give reasons for your view.
9.	Do you agree that a maximum of two VCM triggers per trading session per instrument should be imposed to minimise market interruption?
	Yes
	No, I would prefer: multiple VCM triggers per trading session per instruments
	Please give reasons for your view.
	We would welcome multiple VCM triggers per trading session per instruments to more than a maximum of two to bring us in line with other markets.
10.	Do you support trading within a price limit during the cooling-off period? If not, do you prefer another approach?
	☐ Yes

Pleas	
	e give reasons for your view.
monit	the cooling-off period, do you support resuming the same dynamic price limed toring mechanism (i.e. ±10% (±5%) from the last trade 5 minutes ago in the lities (derivatives) market)? If not, do you prefer another approach?
	Yes
	No, I would prefer:
Please	e give reasons for your view.
Do yo	u have any other suggestions on enhancing the resumption procedures?
Do yo	u agree that the duration of the cooling-off period should be 5 minutes for bot curities and derivatives markets? If not, what would you prefer and why?
Do yo	u agree that the duration of the cooling-off period should be 5 minutes for bot curities and derivatives markets? If not, what would you prefer and why? Yes
Do yo the sec	curities and derivatives markets? If not, what would you prefer and why?

14. Do you agree with the additional market data dissemination for the proposed VCM model? If not, what would you propose and why?

	Yes
	No, I would propose:
	Please give reasons for your view.
15,	If a VCM is triggered for a given instrument, should trading of related instruments (e.g. futures contract of different contract months) on the same underlying continue as normal?
	☐ Yes
	□ No
	Please give reasons for your view.
16.	If a VCM is triggered for a given instrument, should trading of derivatives (e.g. single stock options or warrants) of that instrument continue as normal?
	☐ Yes
	□ No
	Please give reasons for your view.
17.	Do you have any other comments on the VCM proposal?

Part C Consultation Questions - Closing Auction Session

18.	Do mar	you sur ket?	port t	he introduction of the new CAS model in the Hong Kong securities		
	\boxtimes	Yes				
		No				
	Plea	se give	reasor	as for your view.		
	W. ar	e are supproach	ipporti to for	we of introducing the new CAS model as it offers a systematic in the closing price, which is in line with other markets.		
19.	Con	Do you agree that the new CAS model should only be applied to the major index constituent stocks (i.e. Hang Seng Composite LargeCap Index and Hang Seng Composite MidCap Index constituents as well as other Stock Connect Securities for Southbound trading)?				
		Yes				
		No				
	Pleas	se give 1	eason	s for your view.		
20.	Do y ETF	ou agre should l	e that the the	the new CAS model should be applied to ETF? If yes, which type of lied?		
		Yes				
			(i)	Apply to all ETFs		
			(ii)	Only apply to ETFs with Hong Kong stocks as underlying		
		No				

equit	you agree that at a later stage, the new CAS model should be expanded to sy securities and funds as proposed? If so, when should the CAS be rolled a securities and funds?
	Yes, roll out time should be:
	No
Pleas	se give reasons for your view.
[
	ou agree that that the new CAS model should exclude structured products, equants and debt securities?
	ants and debt securities?
warra	Yes No
warra	Yes
warra	Yes No
warra	Yes No
warra D Pleas	Yes No se give reasons for your view.
warra D Pleas	Yes No se give reasons for your view. ou support introducing a price limit during the CAS?
warra D Pleas	Yes No se give reasons for your view.

24.	Do y	you support a price limit of 5% during the Order Input Period for all CAS Securities?
		Yes
		No
	Pleas	se give reasons for your view.
25.	Do y durir	ou agree that a further price limit within the best bid and best ask should be applied ag the No-Cancellation Period and Random Closing Period?
		Yes
		No
26.	Do y	ou agree that at-auction limit orders should be allowed throughout the CAS?
		Yes
		No
	Pleas	e give reasons for your view.
27.	Do yo	ou think short selling orders with a tick rule should be allowed during the CAS?
		Yes
		No
	Pleas	e give reasons for your view.

	Yes
	No
Please	give reasons for your view.
Do yoi	u agree that order amendment and cancellation should be disallowed duri
	ncellation Period and Random Closing Period?
	Yes
	No
Please	give reasons for your view.
Please	give reasons for your view.
Please	give reasons for your view.
Please	give reasons for your view.
	agree that random closing be adopted in the CAS to prevent gaming?
	a agree that random closing be adopted in the CAS to prevent gaming? Yes
	agree that random closing be adopted in the CAS to prevent gaming?

		Up to 2 minutes
		A different duration:
	Pleas	se give reasons for your view.
2.	In th	e absence of a final IEP, do you agree that the reference price should be used as the ng price and for trade matching?
		Yes
		No
	Pleas	e give reasons for your view.
3.	∟_ What	would be the preferred duration of the CAS?
).	(i)	would be the preferred duration of the CAS? Same as the proposed model, i.e. 7-minute Order Input Period to end the CAS at
	(1)	16:12
	(ii)	5-minute Order Input Period to end the CAS at 16:10
	(iii)	Others, please specify:
		Approach (i)
		Approach (ii)
		Approach (iii), please specify:
	Please	e give reasons for your view.

34.	to you agree that some features of the new CAS model may also be beneficial for the OS and/or the Trading Halts? If so, which feature(s)?
	Yes, the feature(s):
] No
	lease give reasons for your view.
35.	o you agree that any enhancements for POS and/or the Trading Halts should be aplemented later rather than during the introduction of the new CAS?
] Yes
] No
	ease give reasons for your view.
36.	by you foresee any issues with your day end processing such as margin calls in the sh market due to the extended trading time for 12 minutes? If yes, how may the issue resolved?
	Yes, suggested solution:
	No
	ease give reasons for your view.
37.	maintain the 45 minutes break before the start of AHFT, do you agree that the start of AHFT to be changed from 17:00 to 17:15? If not, what time do you prefer?
	Yes

	No, time that you prefer:	
Please	give reasons for your view.	
		_

Part D Consultation Questions – Implementation Approach and Timeline

38.	Whi	ch implementation approach for the securities market would you prefer:
	(i)	the development and testing of the VCM, CAS and Trading Halts functionalities are to be implemented together on the AMS/3.8 platform and be rolled out one by one; or
	(ii)	(1) the development, testing and rollout of VCM and CAS are to be implemented together on the AMS/3.8 platform, and (2) Trading Halts proposal is to be introduced as part of the Exchange's next-generation trading system, the Orion Trading Platform-Cash; or
	(iii)	Others, please specify.
		Approach (i)
		Approach (ii)
		Approach (iii), please specify:
39.	What and T	should be the implementation priority among the three initiatives (i.e. VCM, CAS rading Halts) in the securities market?
•	Please	e give reasons for your view.
40.	How specif	long do you need to prepare for the rollout starting from the issuance of the ication for each initiatives:
	(i)	VCM:
		a). under 3 months;
	П	b). 4-6 months:

	c). 7-12 months		
	d). >12 months		
Please give reasons for your view.			
(ii)	CAS:		
	a). under 3 months;		
· · ·	b). 4-6 months;		
	c). 7-12 months		
	d). >12 months		
Please give reasons for your view.			
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- End -