

Submitted via Qualtrics

(Anonymous)

Company / Organisation view

Consultation Question 1(a):

Do you support the proposed arrangements on trade amendment under the T+1 settlement cycle across the Cash Market trade lifecycle?

Please give reasons for your views.

No comment

Consultation Question 1(b):

Do you support the proposed arrangements on post trade under the T+1 settlement cycle across the Cash Market trade lifecycle?

Please give reasons for your views.

No comment

Consultation Question 1(c):

Do you support the proposed arrangements on risk management under the T+1 settlement cycle across the Cash Market trade lifecycle?

Please give reasons for your views.

No comment

Consultation Question 1(d):

Do you support the proposed arrangements on other processes (including reporting, corporate actions, stock conversion arrangement and stamp duty arrangement) under the T+1 settlement cycle across the Cash Market trade lifecycle?

Please give reasons for your views.

Yes, comments (optional) as follows

Yes, [REDACTED] supports the proposed T+1 operating model. The accelerated timetable (including earlier FCS, extended SI window, and compressed trade amendment) strikes a reasonable balance between risk reduction and operational feasibility. We particularly welcome the extension of SI activities to T-day 10:00pm, which provides necessary buffer for post-trade processing. We recommend HKEX continue to monitor batch settlement run timings during the transition to minimise settlement fails.

Consultation Question 2:

Do you have any comments on the assessment of the implications for Exchange Traded Products (ETPs) and Stock Options under the proposed T+1 settlement cycle? In particular, please comment on:

- Guiding principles for the ETP primary market;
- Buy-in considerations for ETPs; and
- Stock options (including exercise and assignment).

Please give reasons for your views.

Yes, comments (optional) as follows

Yes, we agree with the proposed guiding principles for ETP primary market settlement and the adjustment for stock options exercise/assignment. Alignment of primary and secondary settlement cycles for ETPs will enhance market efficiency. We support maintaining the existing buy-in exemption framework for ETP market makers to preserve liquidity. For stock options, we note the need for timely assignment instructions and recommend HKEX provide clear cut-off guidance.

Consultation Question 3:

Do you have any comments that consequential amendments should be made to the Listing Rules to reflect the arrangements proposed under the T+1 operating model?

We have no major comments on the proposed Listing Rules amendments. The changes to ex-entitlement trading (single ex-date aligned with record date) are logical and consistent with the T+1 cycle. We suggest HKEX ensure sufficient lead time for market education on corporate action timetable changes.

Consultation Question 4:

In assessing your circumstances for a T+1 transition, are there any other key topics, perspectives or types of market participants which you believe are relevant to highlight, that have not been covered in Exhibit 1 and paragraphs 110-113?

Please share your views.

Yes, suggestions and considerations as follows

We recommend adding greater emphasis on cross-border funding and FX management for international institutional clients, as well as coordination with global custodians. Another important topic is the impact on retail and margin clients, who may require enhanced client communication and education. We also suggest HKEX consider providing a standardised industry checklist or gap analysis template to facilitate preparation.

Consultation Question 5:

Do you consider the timeframe to be sufficient for you to prepare for T+1 to become effective in Q4 2027, given the advance visibility and lead time provided? Do you have any comments on the discussion and implementation approach?

Please share your views on the proposed approach and timeline.

Yes, comments (optional) as follows

The proposed timeframe (target Q4 2027, with detailed specifications published around Q3 2026) is generally sufficient for a market participant of our size, provided HKEX delivers detailed technical specifications and testing schedules on time. We recommend a minimum 12-month industry-wide testing period after specifications are finalised.

