

**Submitted via Qualtrics**  
**Company/Entity View**

**Question 1 - In line with the existing methodology, HKEX is proposing to add two tiers of exchange-level position limit (200,000 and 250,000 contracts) which will increase the maximum limit to 250,000 contracts for exchange-level position limit for SSO. Would you agree to such change, in view of business needs, risk implications to the Hong Kong market and operational considerations?**

Agree

**Please state reason for your view:**

Yes, we would agree to such a change. We believe this supports the way that the HK market is evolving, with the view that the proposed changes would reclassify the tier of over 50% of SSOs and SSF, indicating previous tiers were insufficient and current position limits are overly restrictive by that measure.

**Question 2 - Do you support the revision of the current SSF position limit model with the introduction of a five-tier model applicable to net positions (with 25,000 contracts as maximum position limit), a single month position limit set at two times the net limit, and a review mechanism for both annual adjustments and corporate actions, in view of business needs, risk implications to Hong Kong market and operational considerations?**

Support

**Please state reason for your view:**

Yes, we would agree to such a change. We believe this supports the way that the HK market is evolving, with the view that the proposed changes would reclassify the tier of well over 50% SSF, indicating previous tiers were insufficient and current position limits are overly restrictive by that measure.

**Question 3 - Considering that flagship-minis are included in the position limits for products that reference the same index, do you support removal of the additional position limit that applies only to flagship-minis, in view of business needs, risk implications to Hong Kong market and operational considerations?**

Support

**Please state reason for your view:**

Yes, we support the Exchanges' proposal to remove the additional position limit that applies to the flagship minis only. As outlined in the consultation paper, there is fungibility between mini

and standard contracts, meaning the existing mini-only position limit is redundant. The current limit hampers trading without helping to maintain an orderly market.

**Question 4 - Do you support revising the Large Open Position reporting requirement (from 2,500 to 500 contracts) for Mini-HSI and Mini-HSCEI futures and options, in view of business needs, risk implications to Hong Kong market and operational considerations?**

Do not support

**Please state reason for your view:**

We do not support the Exchange's proposal to revise the Large Open Position reporting requirement. The proposal would be unnecessarily restrictive and would be administratively burdensome for market participants. Additionally, has the potential to generate many false positives in terms of flagging risky 'large open positions'.