

**Submitted via Qualtrics**

**Company / Entity View**

**Market Represent(s): Derivatives Market**

**Question 1**

**Do you have any comments or concerns on the proposed arrangements for the Hong Kong securities market?**

No

**If the answer is "Yes", please specify your comments or concern:**

N/A

**Question 2**

**Do you have any comments or concerns on the proposed arrangements for Northbound Trading under Stock Connect?**

No

**If the answer is "Yes", please specify your comments or concern:**

N/A

**Question 3**

**Do you have any comments or concerns on the proposed arrangements for Hong Kong derivatives market?**

Yes

**If the answer is "Yes", please specify your comments or concern:**

We fully support the initiative to open trading and clearing venues during on SWT Days. However, for the success of this initiative, we believe additional measures are necessary beyond the involvement of CPs.

Firstly, the Hong Kong banking network, including authorized CCP settlement banks, must support the SWT Day as they do a regular settlement day for all relevant currencies. This ensures regular settlements and collateral movements.

Secondly, both the SEOCH and the HKCC should operate at the same capacity on SWT days as they do on regular business days, providing the same level of service and support to CPs.

Thirdly, all relevant ETD vendors, including execution platforms, market data vendors, and back-office vendors, must actively support the SWT initiative. Their participation is crucial for seamless market operations during such events.

Finally, all EPs operating during a SWT should leverage supporting CPs for adequate give-up processing. In light of this, a non-optional participation model would be beneficial to the market to ensure optimal price discovery,.

We also seek clarification on the following:

- a. If the final settlement price of the 1 and 3 month HIBOR will be based on the HIBOR rate on the trading day following SW, please clarify how existing positions will be margined and marked to market for the SWT Day?
- b. Will HKEx be issuing a circular to notify members whenever such an event occurs?

#### **Question 4**

**Do you have any comments or concerns on the proposed arrangements for new listings and new products?**

Yes

**If the answer is "Yes", please specify your comments or concern:**

No concerns as long as HKEX provides its usual level of support to CPs on SWT Days.

**Question 5a**

**Do you have any comments or concerns on the proposed money transfer arrangements in relation to Cheque Clearing?**

No

**If the answer is "Yes", please specify your comments or concern:**

N/A

**Question 5b**

**Do you have any comments or concerns on the proposed money transfer arrangements in relation to Banking Services?**

Yes

**If the answer is "Yes", please specify your comments or concern:**

The success of the SWT initiative will require Hong Kong's banking network, including authorized CCP settlement banks, treating SWT days as regular settlement days for all relevant currencies.

**Question 6**

**Do you agree with the proposed arrangements for listing applicants and listed issuers as set out in paragraphs 90 – 91?**

No

**If the answer is "No", please specify your comments or concern:**

To eliminate ambiguity, the HKEX rules should explicitly define "business day" as encompassing a SWT Day.

**Question 7**

**Do you agree with the proposed arrangements for listing applicants and listed issuers as set out in paragraphs 92 – 94?**

No

**If the answer is "No", please specify your comments or concern:**

No comments

**Question 8**

**Do you envisage there being any material practical difficulty in complying with any particular Listing Rule requirements?**

No

**If the answer is "Yes", please specify your comments or concern:**

No comments

**Question 9**

**Do you agree that consequential amendments to the Listing Rules should be made?**

Yes

**If the answer is "No", please specify your comments or concern:**

To eliminate potential ambiguity and optimize implementation, the relevant amendments should be made to establish uniformity in the application of any required measures.

**Question 10**

**Under the proposed model, do you foresee any insurmountable difficulties for implementing SWT?**

No

**If the answer is "Yes", please specify your comments or concern:**

N/A

**Question 11**

**Would there be adequate time to prepare for SWT to come effective in July 2024 under the proposed model?**

No

**If the answer is "No", please specify the reasonable length and reason(s):**

Participants should be provided with a minimum lead time of six months to fully prepare for the necessary development, testing, and implementation of SWT.