

Submitted via Qualtrics

Company / Entity View

Market Represent(s): Securities & Derivatives Markets

Question 1

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

Yes

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

In respect of the Clearing Arrangements, our Company would like to seek clarity from HKEX for below questions:

1. Since the last registration date will be postponed in order to support the physical certificate deposit, how will the entitlement be updated in case there is physical deposit on the day after SWT? Would CCASS issue any notice/ alert from CCASS to remind market participants for the entitlement changes?
2. For any corporate action which requests physical instructions (e.g. #777 - Distribution in Specie of Mynd.ai, Inc. ("MYND") ADS), can the submission be made via electronic means or will they be postponed?

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:

Our Company viewed that HK market listed derivatives valuation parameters should be referencing that of HK securities market (i.e. date, open and closing price), and the final price schedule shall be In line with usual schedule to avoid slippage cost during index rebalancing.

Question 4

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

No

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

N/A

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 Company views that under SWT, the inconsistency between exchange trading arrangement and bank open might result in settlement failure clients who are only able to transfer fund physically at bank branch under severe weather. Pre-communication and education to public by HKEX would be recommended.

We would also like to seek clarification on below two questions:

(1) Whether banks which are not included in Appendix IV, be obliged to support CPs by providing services set out in 82 under SWT?

(2) For half day SWT day condition (i.e. when SW is hoisted at PM), will there be any preparation time provided for banks to transit from normal practice to SWT Day support?

Question 6

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

Yes

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

N/A

Question 7

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

Yes

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

N/A

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:

N/A

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:

Our Company agree in general, but would like to obtain more clarity from HKEX on how the main placing settlement agent shall act when CCASS physical depository is closed under SW.

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):

Our Company views that one year would be a more reasonable length to enable us to conduct self-review, streamline our operation procedures and complete all necessary IT enhancements to ensure our readiness under the SWT arrangement.