

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:

1) Difficulty in Commuting: Some essential roles require on-site presence and cannot be substituted with remote work. However, during severe weather conditions, public transportation services might be suspended, preventing employees from reaching their workplaces. This presents a challenge for those who are unable to commute and fulfill our responsibilities effectively.

2) Employee Safety: The safety of our employees is of utmost importance. In situations where certain roles cannot be performed remotely, there are concerns about the well-being and security of employees who may be required to travel to work in hazardous conditions. We must prioritize their safety and minimize any potential risks.

3) Fairness and Equal Opportunities: It is crucial to ensure that all market participants and investor have equal opportunities to engage in trading activities. If certain small or medium-sized brokerages are unable to support severe weather trading, their investors may be excluded from participating, leading to potential fairness issues in the market.

4) Insurance Coverage: During severe weather conditions, employees working under such circumstances should be provided with adequate insurance coverage. However, it is unclear whether insurance policies currently in place offer protection in such situations. Addressing this concern is vital to safeguard the well-being of employees involved in severe weather trading.

5) System and Process Modifications: Implementing severe weather trading requires significant system and process modifications across the entire business logic. Apart from the high development costs and time required, there are inherent risks associated with ensuring the smooth operation of regular business activities while introducing new functionalities.

6) Market Volatility: Severe weather trading may not be as efficient as regular trading, potentially leading to lower market liquidity. Decreased liquidity can result in heightened market volatility, substantial price fluctuations, and overall market instability, further increasing risks and uncertainties for investors.

We kindly request that these concerns be taken into account when evaluating the feasibility and implementation of severe weather trading. It is crucial to strike a balance between the objective of maintaining market stability and ensuring the safety, fairness, and operational efficiency of the trading environment.

Question 2

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

Yes

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

Same as question 1

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:

Same as question 1

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:

Same as question 1

Question 5a

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

Yes

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

In additional to comments on question 1:

1) Disruption of Operations: Severe weather conditions can lead to the closure or limited functioning of bank branches and clearing centers. This can result in delays or even the suspension of cheque clearing services, affecting the timely processing of payments and settlement.

2) Limited Access to Banking Services: Customers may face difficulties in accessing banking services during severe weather events. Physical branches may be closed, and online or mobile banking services may experience disruptions due to power outages or network issues. This can hinder customers' ability to perform essential banking transactions, such as depositing cheques or accessing funds.

3) Customer Inconvenience: Delays in cheque clearing and limited banking services can cause inconvenience to customers. They may experience difficulties in accessing funds, making timely payments, or managing their financial obligations. This can have a significant impact and risk on individuals and cooperates relying on cheque-based

transactions especially if the market volatility is high due to illiquidity of the market during SWT.

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:

In additional to comments on question 1:

1) Disruption of Operations: Severe weather conditions can lead to the closure or limited functioning of bank branches and clearing centers. This can result in delays or even the suspension of cheque clearing services, affecting the timely processing of payments and settlement.

2) Limited Access to Banking Services: Customers may face difficulties in accessing banking services during severe weather events. Physical branches may be closed, and online or mobile banking services may experience disruptions due to power outages or network issues. This can hinder customers' ability to perform essential banking transactions, such as depositing cheques or accessing funds.

3) Customer Inconvenience: Delays in cheque clearing and limited banking services can cause inconvenience to customers. They may experience difficulties in accessing funds, making timely payments, or managing their financial obligations. This can have a significant impact and risk on individuals and cooperates relying on cheque-based transactions especially if the market volatility is high due to illiquidity of the market during SWT.

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:

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- 1) The different definition of "Business Day" would make the market confused.
- 2) If there is not a business day, it would impose a huge risk for current day-end logic. Apart from the high development costs and time required, there are inherent risks associated with.

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?

Yes

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

Same as question 1

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:

N/A

Question 10

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

Yes

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

mentioned above

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):

As it requires system modification and testing and ensures there is no impact on regular business model, a prudent approach should be taken.