

**Fast Interface for New Issuance (FINI): Information Pack**

# Modernising Hong Kong's IPO Settlement Process



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## Versions

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<u>30 November 2021</u> <u>[Current]</u>	Further clarifications and updates provided on: <ul style="list-style-type: none"><li>▪ <a href="#">On-boarding procedures and eligibility requirements (See FAQs A4, C1 and C2)</a></li><li>▪ <a href="#">Use of BCANs to identify public offer subscribers (See FAQs B1, E7, E10 and E13)</a></li><li>▪ <a href="#">SFC's proposed code of conduct on bookbuilding and placing activities (See FAQ D18)</a></li><li>▪ <a href="#">Paperless preferential offerings and employee offerings (See FAQ E3)</a></li><li>▪ <a href="#">Operational model for locking the PFR of CPs (See FAQs E21, E22 and E23)</a></li></ul>
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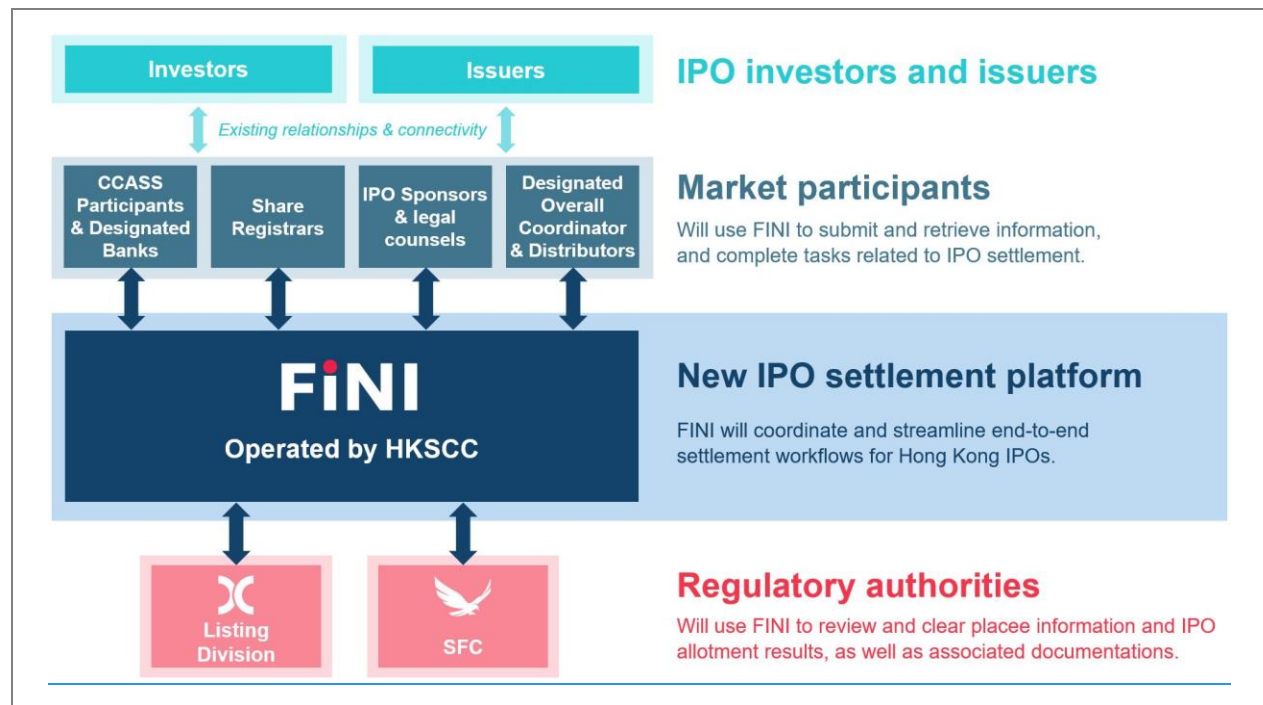
## **DISCLAIMER**

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## A. What is FINI?

“FINI” (*Fast Interface for New Issuance*) is a software platform being developed by HKSCC to modernise Hong Kong’s IPO settlement process.

FINI will allow relevant market participants and authorities to interact digitally and seamlessly on the many important steps that comprise the end-to-end settlement process for new listings. Leveraging modern and user-friendly interfaces with common workflow logic and data standards, the use of FINI will allow IPOs to start trading on the Exchange as soon as “T+2”, two business days after pricing.



### A1. What existing processes or systems is FINI meant to replace?

The key incumbent processes that will be migrated onto the FINI platform are:

- i. The exchange of emails, faxes, physical forms and certain other files between IPO sponsors, legal counsels, ~~lead brokers~~ overall coordinators, distributors, the Listing Division, and the Corporate Finance Division of the SFC on matters of placee vetting, allotment results clearance and associated documentation, as required for regulatory purposes.
- ii. The exchange of emails, faxes, physical forms and certain other information between the IPO issuer, its advisers, its Hong Kong Share Registrar and HKSCC on matters of new stock admission to the CCASS Central Securities Depository (“**CSD**”).
- iii. The CCASS “EIPO” function used by CCASS Participants of HKSCC (“**CPs**”) to input electronic applications for Hong Kong public offer shares.

Through this reform, all key interactions that need to take place between HKEX and various market participants relating to the “last mile” of a Hong Kong IPO (i.e. offering initiation, subscription aggregation, pricing and allotment confirmation, regulatory approvals, money settlement and stock admission) are coordinated with the help of a common platform.

## **A2. Why is FINI being introduced?**

The main benefits of FINI are:

- i. Less time will elapse between IPO subscription, pricing and the start of trading. This will reduce market risk for issuers, their existing shareholders and new investors, bringing Hong Kong in line with the established practice of other leading international equity listing venues.
- ii. There will be less operational risk in IPO settlement due to the digitalisation of interactions; sharing of real-time data among market participants; automation of certain workflows; and facilitation of regulatory compliance and oversight throughout the process.

These benefits are discussed further in the *FINI Concept Paper* and *FINI Concept Paper Conclusions*.

## **A3. What types of listings will be handled through FINI?**

FINI will initially support the new listings of equity securities (ordinary shares or preferred shares), depositary receipts, stapled securities, and Real Estate Investment Trusts (REITs) on SEHK, ~~under the following types of listing including:~~

- i. Primary listings;
- ii. Dual-primary listings;
- iii. Secondary listings;
- iv. Reverse Takeovers / trading resumption offerings;
- v. Listings by way of introduction; and
- vi. Transfers from GEM to the Main Board.

Depending on the type of security and the type of listing, there may be some differences in the exact workflows that will take place on FINI (e.g. some IPOs may include an offering of shares, while some may not). In general, however, the offering initiation, subscription aggregation, pricing and allotment confirmation, regulatory approvals, money settlement and stock admission processes (where applicable) will be handled on the FINI platform, as described further in *FAQ B1*.

HKEX will consider in due course whether FINI will also facilitate certain aspects of follow-on offerings or debt offerings, which are not in scope for the initial “Day 1” launch of FINI.

Note that FINI will not directly handle subscription, allotment or settlement of any preferential offerings or employee offerings that may be conducted as part of a IPO and remain in CCASS as per current practice, which will be handled by the IPO issuer’s Hong Kong Share Registrar (see *FAQ B1, Step 3*).

#### A4. Who is meant to use FINI? [\[Last update: 30 November 2021\]](#)

FINI will have [429](#) user categories, [\(6 of which are designated for different types of IPO market participants\)](#), as set out in the table below. ~~Each user category corresponds to a specific role in IPO settlement.~~ The same entity or individual may play multiple roles in the same IPO, or in different IPOs, and may therefore be permitted for more than one user category.

Note that FINI is a B2B system for use by market intermediaries, issuers' advisers and agents and regulatory authorities. IPO issuers and end-investors will **not** be required or expected to directly use FINI. [The on-boarding procedures for IPO market participants are further described in FAQ C2.](#)

Possible role on FINI	Responsibilities	Access
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##### Issuer's advisers and agents:

1 <a href="#">Sponsor</a>		
<a href="#">Designated Sponsor</a> *	<ul style="list-style-type: none"> <li><a href="#">Manage offering initiation and reference data</a></li> <li><a href="#">Manage deal access control for syndicate members / advisers</a></li> <li><a href="#">Provide certain regulatory submissions</a></li> </ul>	<a href="#">Web</a>
<a href="#">Other Sponsor</a>	<ul style="list-style-type: none"> <li><a href="#">Provide certain regulatory submissions</a></li> </ul>	<a href="#">Web</a>

\* [Previously referred to as the Principal Sponsor.](#)

2 <a href="#">Legal Counsel</a>		
<a href="#">Sponsor Counsel</a>	<ul style="list-style-type: none"> <li><a href="#">Where delegated, provide certain submissions</a></li> </ul>	<a href="#">Web</a>
<a href="#">Issuer Counsel</a>	<ul style="list-style-type: none"> <li><a href="#">Provide certain regulatory submissions required from the Issuer</a></li> </ul>	<a href="#">Web</a>

3 <a href="#">Share Registrar</a>		
<a href="#">HK Share Registrar</a>	<ul style="list-style-type: none"> <li><a href="#">Confirm public, preferential and employee offering subscription levels</a></li> <li><a href="#">Provide public offer allotment information</a></li> </ul>	<a href="#">Web and file transfer</a>

##### Equity syndicate:

4 <a href="#">Intermediary</a>		
<a href="#">Designated Overall Coordinator</a> *	<ul style="list-style-type: none"> <li><a href="#">Confirm deal size, tranche allocations and final pricing</a></li> <li><a href="#">Manage the control list of distributors' share allocations</a></li> <li><a href="#">Provide certain regulatory submissions</a></li> <li><a href="#">Provide placee information and supporting documents</a></li> </ul>	<a href="#">Web</a>
<a href="#">Distributor</a>	<ul style="list-style-type: none"> <li><a href="#">Provide placee information and supporting documents</a></li> <li><a href="#">Provide certain regulatory submissions</a></li> </ul>	<a href="#">Web</a>

\* [Previously referred to as the Principal Lead Broker \("PLB"\).](#)

<a href="#">Possible role on FINI</a>	<a href="#">Responsibilities</a>	<a href="#">Access</a>
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**Public offer participants:**

<a href="#">5</a>	<a href="#">HKSCC Participant</a>	
<a href="#">CCASS Participant of HKSCC (“CPs”)</a>	<ul style="list-style-type: none"> <li><a href="#">Input or amend public offer application lists (“EIPO”)</a></li> </ul>	<a href="#">Web or API</a>

<a href="#">6</a>	<a href="#">HKSCC Designated Bank</a>	
<a href="#">Designated EIPO Banks of CPs (“DBs”)</a>	<ul style="list-style-type: none"> <li><a href="#">Monitor CPs’ EIPO pre-funding requirements</a></li> <li><a href="#">Confirm that CPs have met their pre-funding requirements</a></li> <li><a href="#">Enact money settlement in respect of CPs’ EIPO share allotments</a></li> </ul>	<a href="#">Web or API</a>

**Regulatory authorities:**

<a href="#">7</a>	<a href="#">Listing Division</a>	
<a href="#">IPO Vetting</a>	<ul style="list-style-type: none"> <li><a href="#">Issue FINI keys to Sponsors</a></li> <li><a href="#">Review and clear placee lists and allotment results announcements</a></li> </ul>	<a href="#">Web</a>

<a href="#">8</a>	<a href="#">SFC</a>	
<a href="#">Corporate Finance</a>	<ul style="list-style-type: none"> <li><a href="#">Review and clear placee lists and allotment results announcements</a></li> </ul>	<a href="#">Web</a>

**Platform operator:**

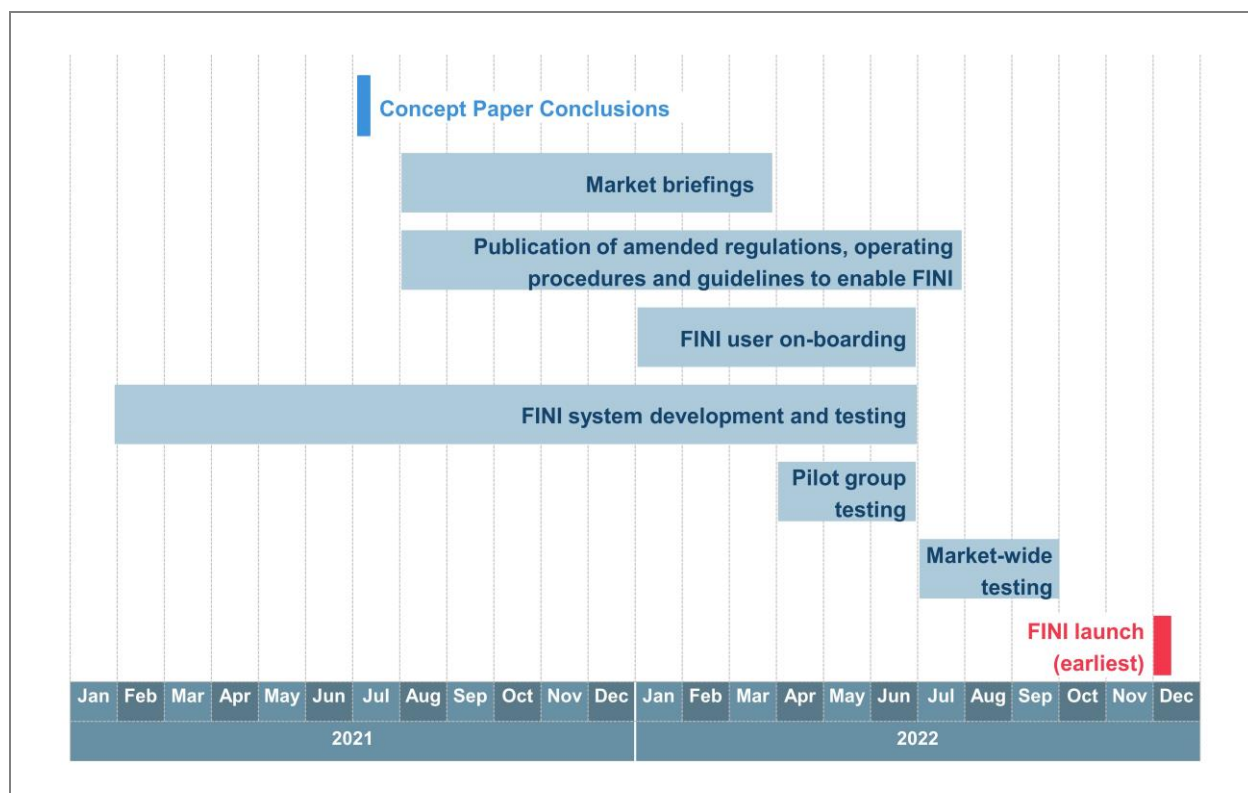
<a href="#">9</a>	<a href="#">HKSCC</a>	
<a href="#">HKSCC (FINI and CCASS operator)</a>	<ul style="list-style-type: none"> <li><a href="#">Admit, manage and support users of the FINI platform</a></li> <li><a href="#">Clear the initiation of new offerings on FINI</a></li> <li><a href="#">Manage EIPO channel subscription, pre-funding and settlement</a></li> <li><a href="#">Manage the deposit of IPO shares into the CCASS CSD</a></li> </ul>	<a href="#">Web and file transfer</a>

**A5. When will FINI be launched?**

**The expected launch of FINI is no earlier than the fourth quarter of 2022.** The introduction of FINI will take place as a one-time cutover from the incumbent “T+5” IPO settlement process, over a weekend to be determined by HKEX closer to the launch time.

Updates regarding FINI platform specifications and market readiness activities will be posted on the FINI website ([https://www.hkex.com.hk/fini?sc\\_lang=en](https://www.hkex.com.hk/fini?sc_lang=en)).

Frequently asked questions for market participants can be found in this *FINI Information Pack*, which is updated by HKEX from time to time.



**A6. Will FINI be mandatory for all IPOs, when launched?**

Yes. The existing “T+5” IPO settlement process will no longer be supported for those types of listing that are migrated to FINI.

## B. IPO settlement workflow

### B1. How does FINI work? [\[Last Update: 30 November 2021\]](#)

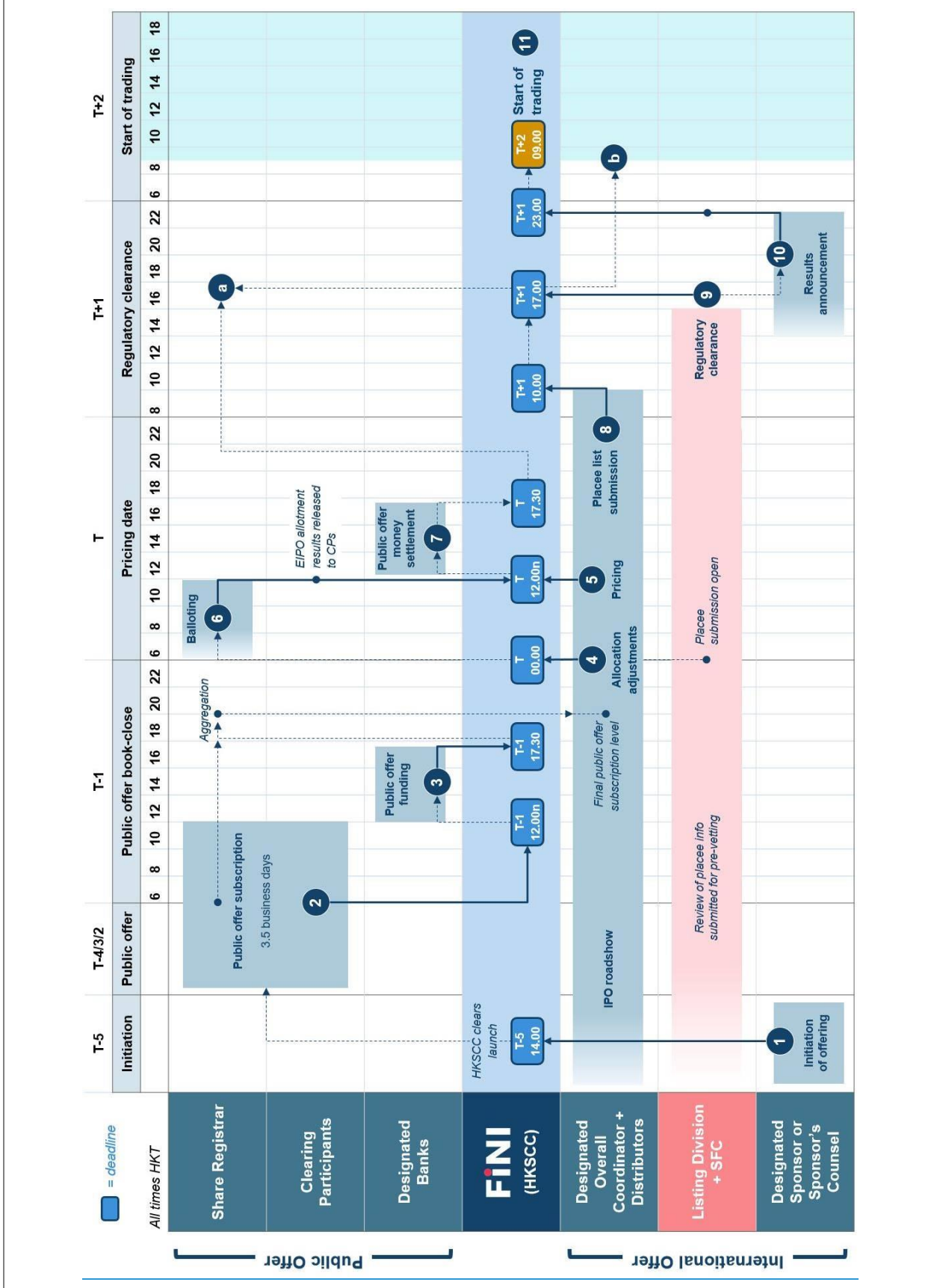
Following the introduction of FINI, all Hong Kong IPO issuers will be expected to conduct their IPO settlement based on a “T+2” timetable (see below flowchart on the following page). *This timetable shows a “typical” Hong Kong IPO that includes both a public offer and international offer.*

“T” denotes the IPO pricing date, “T+2” denotes the first day of trading, and all times are in Hong Kong time.

Step	Activity	Start time	Deadline	Pre-conditions
1	Initiation of offering	Post-Hearing Letter	T-5 14.00	The <a href="#">Principal Designated Sponsor</a> or Sponsor Counsel has been on-boarded to FINI
2	Public offer subscription period	T-4 09.00	T-1 12.00 noon	Step 1 done
3	Public offer funding confirmation	T-1 12.00 noon	T-1 17.30	Step 2 done
4	Allocation adjustments	After Step 3	T 00.00	Step 3 done
5	Pricing deadline	During or after Step 1	T 12.00 noon	-
6	Balloting	After Step 4	T 12.00 noon	Steps 3 + 4 done
7	Public offer money settlement	T 12.00 noon	T 17.30	Steps 5 + 6 done
8	Placee list submission deadline	After Step 4	T+1 10.00	Step 4 done
9	Regulatory clearance	After Step 8	T+1 17.00	Step 8 done
10	Allotment results announcement	After Step 9	T+1 23.00	Step 9 done
11	Start of trading	T+2 09.00		Step 10 done

a	Deposit of public offer shares in the CSD		T+1 17.30	Steps 7 + 9 done
b	Deposit of international offer shares in the CSD		T+2 09.00	Step 9 done





The following pages describe what happens in each step of this timetable. Related FAQs, where referenced, can be found using the FAQ number in *Sections C-F*.

Step	Activity	Start time	Deadline	Pre-conditions
1	Initiation of offering	Post-Hearing letter	T-5 14.00	The <a href="#">Principal Designated Sponsor</a> or Sponsor Counsel has been on-boarded to FINI
<b>Purpose:</b> to provide all prerequisite information for the launch of an IPO.				
<b>Parties involved:</b> Listing Division; <a href="#">Principal Designated Sponsor</a> or Sponsor Counsel; HKSCC.				
<ul style="list-style-type: none"> <li>▪ The Listing Division issues a Post-Hearing Letter to the Sponsor(s) with no objection. The letter contains a unique <i>FINI Key</i>. If there are multiple Sponsors within the IPO, a <a href="#">Principal Designated Sponsor</a> should be appointed to use the <i>FINI Key</i>.</li> <li>▪ <a href="#">Principal Designated Sponsor</a> logs onto the FINI website and enters the <i>FINI Key</i> to begin the initiation of the offering. The <a href="#">Principal Designated Sponsor</a> may delegate this task to the Sponsor Counsel, in which case the <a href="#">Principal Designated Sponsor</a> will be able to view (but not edit) the relevant offering initiation information as it is entered into FINI by the Sponsor Counsel (so as to avoid the same parties inputting or editing the same information concurrently).</li> <li>▪ Initiator enters the following details into an e-form on FINI: <ul style="list-style-type: none"> <li>○ Information about the IPO issuer;</li> <li>○ Key terms, details and timetable of the offering; and</li> <li>○ Supporting documentation and confirmations.</li> </ul> </li> <li>▪ Initiator enters syndicate members' and IPO issuer's advisers' details, granting them access to the IPO on FINI: <ul style="list-style-type: none"> <li>○ List of syndicate members (<a href="#">PLBDOC</a>, Distributors) involved in the IPO; and</li> <li>○ List of IPO issuer's advisers (Issuer Counsel, other Sponsors) and agents (Share Registrar, Receiving Banks) involved in the IPO.</li> </ul> </li> <li>▪ Parties invited to access an IPO on FINI are notified after the completion of <i>Step 1</i>. Access is subject to having been on-boarded as FINI users. Either <a href="#">Principal Designated Sponsor</a> or Sponsor Counsel can then amend the list of users with access permissions at any time.</li> <li>▪ Initiator must submit all required information by 14.00 on T-5: the business day before the public offer opens, i.e. seven business days before the start of trading date. IPOs without a public offer will have a different deadline.</li> <li>▪ HKSCC reviews submission and clears the initiation directly via FINI. Clearance is subject to the IPO issuer's listing prospectus having been published on HKEXnews.</li> </ul>				
<u>After initiation</u>				
<ul style="list-style-type: none"> <li>▪ At the start of the public offer, the IPO moves to "initiated" status. The following functions are opened to FINI users: <ul style="list-style-type: none"> <li>○ All users: may view non-confidential reference data about the IPO via the FINI website and FINI API service;</li> <li>○ CPs: may submit EIPO applications (see <i>Step 2</i>);</li> <li>○ <a href="#">PLBDOC</a>: may access the allocation adjustment and deal pricing interfaces (see <i>Steps 4 and 5</i>); and</li> <li>○ Distributors: may enter placee information in advance and supporting documents but not submit to the regulators yet (see <i>Step 8</i>).</li> </ul> </li> </ul>				
<b><u>What are the main changes with FINI?</u></b>		<b><u>What remains the same as today?</u></b>		
<ul style="list-style-type: none"> <li>▪ A large number of forms required by the Stock Admission team of HKSCC will be retired, as the relevant information will instead be submitted by the initiator via FINI in this <i>Step 1</i>. Please refer to <i>FAQ F1</i> for the full list of such forms.</li> <li>▪ A new IPO reference data service will be available through the FINI website and FINI API service, allowing users to access publicly available (non-confidential) 'golden source' real-time Hong Kong IPO reference data in a structured format directly from the FINI system.</li> </ul>		<ul style="list-style-type: none"> <li>▪ Following the existing process, the IPO issuer's prospectus must be uploaded to HKEXnews, before the offering can begin. This is done outside of FINI, using the ESS system.</li> <li>▪ The <a href="#">Principal Designated Sponsor</a> is responsible for ensuring that all information submitted via FINI is accurate and complete in all material respects, even if the task has been delegated to the Sponsor Counsel. This includes ensuring that only those parties involved in the IPO are</li> </ul>		

granted the right to access that listing via the FINI system in this *Step 1*.

Step	Activity	Start time	Deadline	Pre-conditions
<b>2</b>	<b>Public offer subscription period</b>	T-4 09.00	T-1 12.00 noon	Step 1 done

**Purpose:** to capture demand for shares in the public offer tranche of the IPO.

**Parties involved:** CCASS Participants of HKSCC (“CPs”); HKSCC; Share Registrar.

HKSCC EIPO channel

- If the IPO features a public offer, CPs submit EIPO applications to HKSCC via FINI during this period.
- Applications must include:
  - Stock code of the IPO;
  - Number of shares being applied for;
  - Applicant’s identifying details (see [FAQ E7](#)) or [Broker-to-Client Assigned Number \(“BCAN”\)](#) (see [FAQ E10](#)); and
  - SEHK Participant ID (optional – for CPs’ collection of brokerage only).
- Applications lacking the above details will not be accepted by FINI.
- Applications may be submitted through the FINI website (direct entry or file upload) or via FINI API.
- CPs may view, add, amend or withdraw applications during the public offer period, up until the closing at 12.00 noon on T-1.
- FINI displays the *indicative* public offer over- / under-subscription level to users throughout the public offer period.
- At the end of the public offer period, FINI ~~removes~~will consolidate the list of applications submitted using BCANs and retrieve the applicants’ Client Identification Data (“CID”) from SEHK.
- After retrieving the underlying CIDs, FINI flags any instances of multiple subscriptions by the same investor from the consolidated EIPO application list. The affected CPs are notified (see [FAQ E11](#)).

e-White channel, preferential and employee offerings

- Investors may apply for public offer shares to be held in their own name via the Share Registrar in the usual manner.
- The conduct of any preferential or employee offerings as part of the IPO will be detailed in the IPO issuer’s prospectus.
- **Paperless application procedures are adopted.**

**What are the main changes with FINI?**

- The CCASS EIPO function will be retired. CPs must instead use FINI to submit EIPO applications to HKSCC.
- Paper-based application forms for the public offer will not be supported by FINI (see [FAQ E3](#)).
- HKSCC's public offer subscription service for CCASS Investor Participants will be discontinued (see [FAQ E6](#)).
- A mandatory, harmonised identification standard for individual and corporate investors in both the EIPO and e-White channels will be adopted (see [FAQ E7](#)).
- The "How to Apply for Hong Kong Offer Shares" section of listing prospectuses will be updated and simplified for prospective investors' reference.

**What remains the same as today?**

- Investors may apply for public offer shares in the usual manner, either via their broker or via the Share Registrar (to hold physical certificates in own name).
- The public offer lasts 3.5 business days, ending at 12 noon on the final day, as per current market practice.
- Submission of EIPO applications via FINI is treated as the giving of instructions to HKSCC to apply for public offer shares on the CP's behalf. It is subject to the conditions and undertakings specified in the [CCASSHKSCC Rules and Operating Procedures](#), and in the IPO issuer's prospectus.
- Public offer applicant eligibility, denomination tables, application fees and balloting arrangements remain as per current market practice, and will be set out in the IPO issuer's prospectus.

Step	Activity	Start time		Deadline		Pre-conditions
3	Public offer funding confirmation	T-1	12.00 noon	T-1	17.30	Step 2 done

**Purpose:** to ascertain that public offer subscription interest is backed by sufficient funds for successful settlement.

**Parties involved:** CPs; Designated EIPO Banks of CPs ("DBs"); HKSCC.

#### HKSCC EIPO channel

- In order to use FINI, CPs will need to:
  - Set up an EIPO pre-funding arrangement with a FINI-ready DB; and
  - Elect whether to opt in or opt out of using compressed pre-funding for its EIPO orders (see [FAQ E15](#)).
- At the end of the public offer period:
  - FINI calculates each participating CP's pre-funding requirement ("PFR") in accordance with [FAQ E15](#);
  - The CP's PFR is displayed on its FINI interface; and
  - The CP's PFR is notified to the CP's DB via the FINI API and FINI interface.
- The CP's DB:
  - Receives the CP's PFR from FINI;
  - Locks the required PFR amount based on funds available in the CP's respective bank account; and
  - Confirms that the CP's locked funds balance is sufficient to meet its PFR, by sending a confirmation response message to HKSCC via the FINI API by 17.30 on T-1 (see [FAQ E2+E22](#)).
- In case of insufficient funds during the [withdrawal/pre-funding](#) window, a CP may be permitted to amend and reconfirm its EIPO application list via FINI, which will notify its DB. [HKSCC will provide further details on this in due course](#) (see [FAQ E23](#)).
- At the 17.30 deadline, a missing or negative confirmation from its DB [invalidates and removes results in the invalidation of](#) the CP's EIPO applications.

#### Public offer aggregation

- HKSCC sends the EIPO application file to the Share Registrar shortly after 17.30 on T-1 for further processing. This file shows the status of each EIPO application as either valid, invalidated for being a duplicate, or invalidated for failing pre-funding.
- The Share Registrar inputs the final subscription levels of the public offer (EIPO and e-White), as well as preferential and employee offerings (if any) into FINI for reference and downstream processing by 20.00 on T-1. This also serves to formally determine whether any applicable clawback has been triggered (see [FAQ D6](#)).

#### What are the main changes with FINI?

- Interbank settlement of EIPO pre-funding between DBs and receiving bank(s) will no longer be conducted. A new fund locking mechanism at the DB level will be used to hold CPs' pre-funding monies, with interbank settlement taking place in respect of CPs' *actual* share allotments after the public offer ballot is held (see [FAQ E14](#)).
- HKICL EPI pre-matching will be discontinued.
- A new set of Direct Debit Authorisations will be signed between HKSCC and [CPs/DBs](#). [DBs are required to arrange similar Direct Debit Authorisations with their CP clients](#).
- CCASS EIPO EPI reports will be replaced by FINI online PFR reports for Sponsors, CPs, DBs and the IPO issuer's receiving bank(s).

#### What remains the same as today?

- Each CP appoints only one DB per currency for EIPO settlement purposes.
- CPs who fail to arrange the required funds to support their EIPO applications will have these applications invalidated and will be considered in breach of the HKSCC Rules.
- The public offer subscription level is determined based on the sum of successfully pre-funded applications only.
- There is no centralised pre-funding confirmation mechanism in respect of the international offer tranche, which will follow existing market practice for money settlement and stock admission.

Step	Activity	Start time	Deadlines	Pre-conditions
4	Allocation adjustments	After Step 3	T 00.00	Step 3 done
<b>Purpose:</b> for the IPO issuer's syndicate to adjust the allocation of shares between each tranche of the offering, if required.				
<b>Parties involved:</b> <a href="#">Principal Lead Broker</a> (" <a href="#">PLB Designated Overall Coordinator</a> (" <a href="#">DOC</a> ")"); Share Registrar.				

- The **initial** allocation of shares by the IPO issuer to each tranche of the offering is captured in FINI during *Step 1*.
- The **final** allocation of shares may vary from the initial allocation due to:
  - Oversubscription in the public offer (potential clawback);
  - Undersubscription in the public offer (claw-forward);
  - Undersubscription in any preferential or employee offers;
  - Placing Tranche Reallocation under HKEX-GL91-18;
  - Over-allocation to the public and / or international offers; and
  - Upsize of the public and / or international offers.
- Depending on the terms of the offering, the [PLBDOC](#) will confirm all **allocation adjustments** directly via FINI.

Public offer allocation

- The Share Registrar confirms the official public offer over- / under-subscription level, as well as the final number of allotted shares and applications of any preferential and employee offerings, via FINI by 20.00 on T-1.
- The [PLBDOC](#) confirms the final allocation of shares to the public offer via FINI by midnight (the start of T-day). As a result:
  - The size of the public offer ballot is fixed, and balloting can proceed (see *Step 6*); and
  - The submission of placee lists to the regulators via FINI can begin (see *Step 8*).

International offer allocation

- The [PLBDOC](#) will confirm any further adjustments to the size of the **international offer** (as set out above), if permitted under the terms of the offering, at any time up until the placee list submission deadline of 10.00 on T+1.

What are the main changes with FINI?

- Improved information flow, data validation, and downstream processing in respect of any allocation adjustments that may be applicable to the IPO issuer.

What remains the same as today?

- The clawback and claw-forward mechanisms.
- Re-allocation, upsize and over-allotment options.
- Any waivers that may be granted to the IPO issuer by the Listing Division in respect of allocation adjustments described above.

Step	Activity	Start time	Deadline	Pre-conditions
<b>5</b>	<b>Pricing deadline</b>	During or after Step 1	T 12.00 noon	-
<b>Purpose:</b> to confirm the pricing of the IPO.				
<b>Parties involved:</b> <a href="#">PLBDOC</a> .				

- The [PLBDOC](#) enters the final IPO price into FINI by 12.00 noon on T-day, two days before the commencement of trading.
- FINI checks that the price is within the pricing range disclosed in the IPO issuer's prospectus and captured in *Step 1*.
- In the case of a fixed-price offering, the final price would have already been entered during *Step 1*, thus no need to re-confirm.

**What are the main changes with FINI?**

- A specific cut-off time for final pricing is established, which is 45 hours before the commencement of trading. Pricing confirmation well before this deadline is, of course, permitted.
- FINI [has functionality to will](#) provide data tables to the [Principal Designated](#) Sponsor and Sponsor Counsel for the drafting of:
  - (i) the price flexibility announcement, in the event that the price flexibility mechanism is triggered; and
  - (ii) the delay in listing timetable announcement, in the event that the listing date is delayed.

**What remains the same as today?**

- IPO roadshows, book-building and pricing flexibility will follow existing practices, and will be done outside of FINI.
- If the offering cannot be priced in time, the Listing Division will consider requiring the IPO issuer to delay its listing, which will ordinarily also require the publication of a supplemental prospectus.
- Any announcement published in relation to pricing is the Sponsors' and the issuer's responsibility, and the information therein should be accurate and complete in all material respects.

Step	Activity	Start time	Deadline	Pre-conditions
<b>6</b>	<b>Balloting</b>	After Steps 3 + 4	T 12.00 noon	Steps 3 + 4 done
<b>Purpose:</b> to allocate shares in the public offer tranche to applicants.				
<b>Parties involved:</b> Share Registrar; HKSCC.				
<ul style="list-style-type: none"> <li>▪ The Share Registrar agrees the basis for allotment with the IPO issuer and conducts balloting in respect of the public offer.</li> <li>▪ The Share Registrar sends the public offer allotment file to FINI by 12.00 noon on T-day, comprising a full list of successful public offer applicants and their respective share allotments.</li> </ul>				
<b><u>What are the main changes with FINI?</u></b>		<b><u>What remains the same as today?</u></b>		
<ul style="list-style-type: none"> <li>▪ The format and content of the public offer application and allotment files is harmonised between the Federation of Share Registrars and HKSCC, reflecting an improved standard of investor identification (see <i>FAQ E7</i>).</li> </ul>		<ul style="list-style-type: none"> <li>▪ The roles and responsibilities of the Share Registrar as the IPO issuer's agent.</li> </ul>		
Step	Activity	Start time	Deadline	Pre-conditions
<b>7</b>	<b>Public offer money settlement</b>	T 12.00 noon	T 17.30	Steps 5 + 6 done
<b>Purpose:</b> to transfer public offer proceeds to the IPO issuer's receiving bank(s).				
<b>Parties involved:</b> DBs; HKSCC.				

- HKSCC generates money settlement instructions via RTGS CHATS at around 12.00 noon on T-day to:
  - debit each CP's EIPO share allotment value (and fees in respect thereof) from its DB;
  - credit the IPO issuer's account with its receiving bank(s) with the same amount.
- CPs' unused PFR is released by their Designated Bank concurrently with public offer money settlement.
- CPs' EIPO shares are deposited into CCASS by 17.30 on T+1, following regulatory clearance of placee lists (see *Step "a"*).

**What are the main changes with FINI?**

- Public offer money settlement occurs in respect of *allocated* shares only, not in respect of *subscribed* shares.
- Settlement value is based on the *final* IPO price, rather than the top of the price range. The IPO issuer's receiving bank does not need to make refund payments, unless the IPO is cancelled following this step.
- RTGS CHATS is used instead of EPI (see *FAQ E24*).
- In the extreme case of a money settlement failure, the affected EIPO shares will be reallocated to the international offer tranche, or to the underwriters, as disclosed in the IPO issuer's prospectus (see *FAQ E25*).

**What remains the same as today?**

- An IPO issuer may appoint more than one receiving bank.
- The money settlement process in respect of the international offer tranche of the IPO is not affected by this arrangement (see *FAQ F2*).

Step	Activity	Start time	Deadline	Pre-conditions
<b>8</b>	<b>Placee list submission deadline</b>	After Step 4	T+1 10.00	Step 4 done
<b>Purpose:</b> to submit international offer placee information for regulatory review.				
<b>Parties involved:</b> <a href="#">PLBDOC</a> ; Distributors; <a href="#">Principal/Designated</a> Sponsor or Sponsor Counsel; Listing Division; SFC.				
<ul style="list-style-type: none"> <li>▪ Authorised Distributors enter placee information into FINI either via direct input entry or file upload on the FINI website.</li> <li>▪ If needed, supporting documents for certain types of placees are submitted together with the respective placee list.</li> <li>▪ FINI will check whether submitted placees have been allotted shares in the public offer (see <i>FAQ D17</i>).</li> <li>▪ The <a href="#">PLBDOC</a> supervises Distributors' placee list submission status via a dynamic "control list" on FINI.</li> <li>▪ <b>Marketing Statements and Letters of Independence are generated for electronic submission via FINI</b> (see <i>FAQ D13</i>).</li> </ul>				
<b><u>What are the main changes with FINI?</u></b>		<b><u>What remains the same as today?</u></b>		
<ul style="list-style-type: none"> <li>▪ The submission of placee lists and supporting documents to the Listing Division is done electronically via FINI. Email or other submission formats will no longer be accepted.</li> <li>▪ FINI incorporates a number of novel features to streamline and facilitate the placee list submission and review process (see <i>FAQ D12</i>).</li> <li>▪ Electronic signatures given via FINI will be accepted for the submission of placee lists and related forms.</li> </ul>		<ul style="list-style-type: none"> <li>▪ Regulatory requirements in respect of placee information and submission (see <i>FAQ D12</i>).</li> <li>▪ The Listing Division and the SFC can view and comment on placee information (see <i>FAQ D14</i>).</li> <li>▪ Pre-vetting for placing of shares to connected clients (see <i>HKEX-GL-110-21</i>) will occur outside of FINI, but the finalised placee will need to be formally submitted by the relevant Distributor via FINI during <i>Step 8</i>.</li> </ul>		
Step	Activity	Start time	Deadline	Pre-conditions
<b>9</b>	<b>Regulatory clearance</b>	After Step 8	T+1 17.00	Step 8 done
<b>Purpose:</b> to approve the proposed allotment of shares international offer investors, as required by the Listing Rules.				
<b>Parties involved:</b> <a href="#">PLBDOC</a> ; Distributors; IPO Sponsor(s) or Sponsor Counsel; Issuer Counsel; Listing Division; SFC.				



- The Listing Division and / or the SFC may provide comments on placee lists or related documents directly via FINI.
- Distributors may amend their placees in response to comments raised by the regulators. If changes are to be made to an already submitted placee list other than in response to a comment raised by the regulators, consent from the Listing Division needs to be sought by the relevant Distributor.
- Where necessary, the Listing Division may grant time extensions for placee list submission, amendment or review on a case-by-case basis, to the extent that the IPO issuer's overall listing timetable is not affected.
- After review, the Listing Division issues regulatory clearance of the IPO issuer's international placing.

**What are the main changes with FINI?**

- Regulatory clearance of placee lists will be issued via FINI as electronic confirmations.

**What remains the same as today?**

- Regulatory clearance is required under the Listing Rules for the placee lists, as is consent for placing shares to connected clients and existing shareholders of the IPO issuer.
- Comments on placee lists may be provided by both the Listing Division and the SFC.

Step	Activity	Start time	Deadline	Pre-conditions
<b>10</b>	<b>Allotment results announcement</b>	After Step 9	T+1 23.00	Step 9 done

**Purpose:** to announce the IPO's allotment results to the public.

**Parties involved:** [Principal Designated](#) Sponsor or Sponsor Counsel; Listing Division; SFC.

- Based on the IPO reference data, public offer allotment results and cleared placee lists, FINI generates the following:
  - The Sponsor's Declaration to be electronically submitted by the [Principal Designated](#) Sponsor.
  - The Issuer's Declaration, to be signed offline by the IPO issuer and uploaded by the Issuer Counsel to FINI.
  - The HKSCC Formal Stock Admission Letter, for reference by all parties.
  - Depository arrangements for international offer shares (Placement Form) (*Step "b"*).
- FINI also generates a **bilingual allotment results data table for the Sponsor's convenience**, following the format of the results announcement required under Main Board Listing Rule 12.09 (or GEM Listing Rule 16.14). A finalised allotment results announcement (both English and Chinese) should be submitted to the regulators via FINI for final clearance, and made available on HKEXnews after obtaining such clearance. FINI then generates a no comment letter for reference by all parties.

**What are the main changes with FINI?**

- Various mandatory regulatory submissions will be generated automatically for electronic submission via FINI. The submission format and sequence of the documents vary from current practice (see *FAQ D13* for the full list).

**What remains the same as today?**

- The roles and responsibilities (including regulatory obligations) of Distributors and Sponsors as the IPO issuer's advisers.
- The allotment results announcement should be uploaded by the [Principal Designated](#) Sponsor or Sponsor Counsel directly onto HKEXnews using the ESS system. FINI will not do this on the issuer's behalf, although such a feature may be considered by HKEX later on.

Step	Activity	Start time	Deadline	Pre-conditions
<b>11</b>	<b>Start of trading</b>	T+2 09.00		Step 10 done

**Purpose:** commencement of trading in the IPO issuer's shares on the Exchange.

- The IPO issuer's shares start trading on the Exchange.

<p><b><u>What are the main changes with FINI?</u></b></p> <ul style="list-style-type: none"> <li>When the stabilising manager exercises an over-allotment option during the stabilisation period, the IPO issuer's advisers may submit through an e-form on FINI to HKSCC the depository arrangements of the shares into CCASS, instead of a word document via email.</li> </ul>	<p><b><u>What remains the same as today?</u></b></p> <ul style="list-style-type: none"> <li>Exercise of any over-allotment option and stabilising actions after the listing date will follow the existing procedures, e.g. publication of an end of stabilisation period announcement.</li> </ul>
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Securities issued in the IPO will be deposited into the CCASS Central Securities Depository as follows:

Step	Activity	Deadline	Pre-conditions
<b>a</b>	<b>Deposit of public offer shares in the CSD</b>	T+1 17.30	Steps 7 + 9 done
<p><b>Parties involved:</b> CPs; HKSCC; Share Registrar.</p>			
<ul style="list-style-type: none"> <li>Following public offer money settlement (<i>Step 7</i>), the Share Registrar is responsible for the delivery of public offer share certificates (bearing the legal title of HKSCC Nominees Limited) to the CCASS Depository's service counter. Following successful reconciliation and the regulatory clearance of placee lists (<i>Step 9</i>), FINI will instruct CCASS to credit CPs' CCASS Stock Segregated Account (Account 02) in respect of their allotted shares.</li> </ul>			
<p><b><u>What are the main changes with FINI?</u></b></p> <ul style="list-style-type: none"> <li>Timing changes to the delivery of public offer share certificates and posting of shares into CP's CCASS stock accounts, as a result of an accelerated settlement process.</li> </ul>	<p><b><u>What remains the same as today?</u></b></p> <ul style="list-style-type: none"> <li>The roles and responsibilities of Share Registrars.</li> </ul>		

Step	Activity	Deadline	Pre-conditions
<b>b</b>	<b>Deposit of international offer shares in the CSD</b>	T+2 09.00	Step 9 done
<p><b>Parties involved:</b> <a href="#">PLBDOC</a>; Distributors; HKSCC; Share Registrar.</p>			
<ul style="list-style-type: none"> <li>At the public offer start (<i>Step 2</i>), the issuer's advisers (Sponsors, Sponsor Counsel, <a href="#">PLBDOC</a> and Issuer Counsel) may start inputting the international offer's settlement particulars via a Placement e-form, such as the number of shares to be deposited into CCASS, and the specific CCASS Segregated Stock Accounts (Account 02) into which the shares are to be credited. Following regulatory clearance of placee lists (<i>Step 9</i>), the Placement Form may be submitted to HKSCC for clearance.</li> <li>Following HKSCC's clearance, the Share Registrar is responsible for the delivery of international offer share certificates (bearing the legal title of HKSCC Nominees Limited) to the CCASS Depository's service counter. After successful reconciliation, HKSCC will credit the applicable CCASS Stock Segregated Accounts based on the finalised Placement Form.</li> </ul>			
<p><b><u>What are the main changes with FINI?</u></b></p> <ul style="list-style-type: none"> <li>The Placement Form covering the international offer arrangements will be submitted as an e-form via FINI, instead of a word document via email.</li> </ul>	<p><b><u>What remains the same as today?</u></b></p> <ul style="list-style-type: none"> <li>The roles and responsibilities of the IPO issuer's advisers and agents.</li> </ul>		

## C. Platform access, permissions and data handling

### C1. Which firms are eligible to become FINI users? [\[Last Update: 30 November 2021\]](#)

As noted in *FAQ A4*, FINI is a B2B system for use by market intermediaries, regulatory authorities, and issuers' advisers and agents. The eligibility criteria for on-boarding to use the system are as follows:

FINI user category	Eligibility requirements for on-boarding
<del>Principal Sponsor / Other Sponsors</del>	<ul style="list-style-type: none"> <li>• Holds a valid SFC Type 6 <del>license</del><a href="#">license</a>.</li> </ul>
<del>Sponsor Counsel / Issuer Legal Counsel</del>	<ul style="list-style-type: none"> <li>• Registered <del>as a Hong Kong Solicitors' Firm under</del><a href="#">with</a> the Hong Kong Law Society.</li> </ul>
<del>Principal Lead Broker / Intermediary Distributor</del>	<ul style="list-style-type: none"> <li>• Holds a valid <del>SFC Type 1 licence or an equivalent in an overseas jurisdiction</del><a href="#">securities license issued by a recognised securities regulator</a>.<sup>1</sup></li> </ul>
<del>CCASS/HKSCC Participant of HKSCC ("CP")</del>	<ul style="list-style-type: none"> <li>• Admitted as <del>an HKSCC</del><a href="#">a</a> Participant <del>of CCASS (other than an Investor Participant)</del>.</li> </ul>
<del>HKSCC Designated EIPO Bank of CP ("DB")</del>	<ul style="list-style-type: none"> <li>• Registered as a designated bank with HKSCC to perform EIPO services.</li> </ul>
Share Registrar	<ul style="list-style-type: none"> <li>• Registered as a Member of the Federation of Share Registrars.</li> </ul>

*\*For users who would like to interact with FINI via non-browser based methods (e.g. API, direct file transfer), successful system connectivity tests will also be required before using the system.*

### C2. How do I on-board my firm to FINI? [\[Last Update: 30 November 2021\]](#)

The [formal](#) on-boarding process is expected to begin in the first quarter of 2022. ~~⊖~~[The on-boarding requirements for each FINI users will require signing of a user type are as follows:](#)

FINI user category	Required submission(s) for on-boarding
<a href="#">Sponsor</a>	<ul style="list-style-type: none"> <li>• <a href="#">An Application Form, for the acceptance of the FINI Terms and Conditions; and</a></li> <li>• <a href="#">A copy of the applicant's Business Registration Certificate.</a></li> </ul>
<a href="#">Legal Counsel</a>	<ul style="list-style-type: none"> <li>• <a href="#">An Application Form, for the acceptance of the FINI Terms and Conditions; and</a></li> <li>• <a href="#">A copy of the applicant's Business Registration Certificate.</a></li> </ul>

<sup>1</sup> Defined as a signatory to the International Organization of Securities Commissions' (IOSCO) Multilateral Memorandum of Understanding Concerning Consultation and Cooperation and the Exchange of Information (MMoU) ([link](#)).

<a href="#">Intermediary</a>	<ul style="list-style-type: none"> <li>• <a href="#">An Application Form, for the acceptance of the FINI Terms and Conditions; and</a></li> <li>• <a href="#">A copy of the applicant's Business Registration Certificate.</a></li> </ul>
<a href="#">HKSCC Participant</a>	<ul style="list-style-type: none"> <li>• <a href="#">If the applicant <b>is</b> an existing user of HKEX Client Connect, then <b>no action is required</b>. HKSCC will directly grant the CP's existing administrators the rights to create individual FINI users.</a></li> <li>• <a href="#">If the applicant <b>is not</b> an existing user of HKEX Client Connect, then an Application Form is required to set up delegated administrator(s) for the creation of individual FINI users.</a></li> <li>• <a href="#">HKSCC Rules will be amended such that CP's use of FINI will be subject to and bound by the FINI Terms and Conditions.</a></li> </ul>
<a href="#">HKSCC Designated Bank</a>	<ul style="list-style-type: none"> <li>• <a href="#">An Application Form, for the acceptance of the FINI Terms and Conditions.</a></li> </ul>
<a href="#">Share Registrar</a>	<ul style="list-style-type: none"> <li>• <a href="#">An Application Form, for the acceptance of the FINI Terms and Conditions; and</a></li> <li>• <a href="#">A copy of the applicant's Business Registration Certificate.</a></li> </ul>

[If an applicant wishes to be on-boarded as two or more different FINI user types, e.g. as a Sponsor and an Intermediary, then only one Application Form and set of supporting documents is required.](#)

[All applicants should submit their application form to accept and agree to be bound by the FINI Terms & Conditions, setting out the basis on which each user will be able to use the FINI platform. documents by email to \[projectfini@hkex.com.hk\]\(mailto:projectfini@hkex.com.hk\) \(titled "FINI On-boarding"\), with hard copies to follow by post:](#)

[Hong Kong Exchanges and Clearing Limited](#)  
[30/F, One Exchange Square](#)  
[8 Connaught Place](#)  
[Central, Hong Kong](#)

HKEX will provide [details/further briefings](#) to each stakeholder group [on the FINI website](#) in due course.

### **C3. How do I log on to the FINI system?**

FINI will be accessible through the internet using desktop-based and mobile browsers to navigate the FINI website or via FINI API for certain functions.

The authentication service for FINI uses the infrastructure of HKEX Client Connect, so users who already use that platform for other HKEX web services will be able to use their existing credentials to access FINI.

#### **C4. How can I manage who from my firm has access to FINI?**

FINI will use the same identity management framework as HKEX Client Connect, which provides a high degree of flexibility and control over who can do what in the system. This framework has three tiers:

- i. *Entity level.* A single entity (a FINI user) may play multiple roles, for example, acting as a Distributor in some IPOs, a Sponsor in others, and / or a CP in others. Each FINI user will need to choose which role(s) for it wishes to be enabled during the FINI on-boarding process. These rights can be varied later by request to HKSCC.
- ii. *Individual level.* Within a FINI user's organisation, specific individuals or groups (teams) may be assigned by the FINI user's administrators to one or more of the roles for which that user is enabled, meaning that some people may be able to access certain functions that their colleagues cannot. This will enable the preservation of internal "Chinese walls", data segregation arrangements and access controls.

The administrators appointed by FINI users will perform user creation and maintenance functions and manage a FINI user's permissions in these first two tiers. Existing users of HKEX Client Connect may retain their existing administrators, for whom the above options will become enabled upon on-boarding to FINI.

- iii. *Deal level.* Each IPO on FINI will further have its own permissioning structure, whereby specific teams from on-boarded FINI users may be assigned to roles in a particular IPO, meaning that their access rights are enabled. This tier will be managed by the [Principal Designated Sponsor](#) and / or Sponsor Counsel (where delegated to do so) for each particular IPO, as set out in *Step 1 of FAQ B1*.

A fourth tier of permissioning at the *task level* is built directly into the design of the FINI application, and will vary depending on the task or activity being undertaken, its status (e.g. pending / submitted), the overall settlement timetable, and the role of the user involved (e.g. the [Principal Lead Broker DOC](#) will not be able to confirm the final allocation of shares to the public offer tranche until the public offer period has closed). These arrangements will become apparent to FINI's users during platform testing, market rehearsals, and the FINI User Guide that will be released by HKEX on the FINI website in due course.

#### **C5. What will I be able to do once logged in to FINI?**

Depending on their role, users of FINI can view, input, edit or download information and documents related to those IPOs in which they are formally involved. Users will not have access to non-public information about deals in which they are not formally involved, or which is confidential to other users of FINI (see *FAQ D15* for an example).

Public deal-related reference data, such as the offer price range and the timetable, will be available to all FINI users in a structured format, as well as to third parties (such as information providers, finance-related websites, for example) through FINI's IPO reference data API service.

If a FINI user is working on multiple IPOs concurrently, these IPOs will all show up on its FINI interface, and the user may navigate between them without leaving the platform.

#### **C6. How is data privacy on FINI protected?**

Data that is entered into FINI by its users will be used by HKSCC, as the operator of the FINI system, to facilitate IPO settlement. Consistent with current market practice, such data may be provided to the Exchange, the SFC, the IPO issuer and its advisers/agents (Sponsors, Sponsor Counsel, Issuer Counsel, Share Registrar), as the case may be, for either regulatory purposes or to enable them to carry out their functions and responsibilities during the IPO settlement process. In any event, no personal information will be made available online unless otherwise required by the applicable rules and regulations (including any guidance issued by the regulators) and in full compliance with the PDPO. Uses of data will include operational processing, pre-populating certain documents or statistical analysis, regulatory compliance, and reporting that is incidental to the IPO settlement process. The terms governing FINI's users' access to, and submission of data to, the platform will be set out in the FINI Terms and Conditions.

To the extent that any personal data of FINI's users, or their underlying clients, is necessary to facilitate IPO settlement (e.g. the submission of public offer applications or placee lists), the collection, storage, use and transfer of such information will need to comply with relevant data protection laws and regulations. Under the FINI Terms and Conditions, HKSCC will require intermediaries which submit their clients' personal data to FINI to have obtained all necessary consents and authorisations from those clients under the applicable laws and regulations prior to the submission of such data to FINI.

As is the case for all HKEX-operated core market systems, FINI also features security controls over data access, storage and usage. Access to FINI will take place through a centralised authentication service, with controls to ensure that only relevant information is accessible to authorised, pre-registered and successfully authenticated users. Web interface access will be subject to two-factor authentication, while API access will be subject to JSON Web Token authentication, following OAuth protocol. Security measures in the infrastructure design and data encryption will also be built into the platform.

#### **C7. What are the operating hours of FINI?**

FINI will operate with high availability almost around-the-clock, with occasional scheduled weekend maintenance periods that will be communicated to users in advance.

#### **C8. Where is the FINI system hosted?**

FINI will be hosted on multiple cloud data centres across availability zones, each capable of supporting all FINI functions independently. All data centres are based in Hong Kong due to data sovereignty laws. However, to mitigate the risk of extreme events, data centres will be spread across Hong Kong.

#### **C9. Will the FINI interface support different languages?**

The FINI interface will primarily be displayed in English. FINI will also support the inputting of characters in Chinese and other languages where needed, e.g. the full names of IPO issuers and subscribers.

## D. IPO Issuers and syndicate operations

### D1. Can IPO issuers choose a longer settlement period than “T+2” for their listing? If yes, under what circumstances?

For IPOs that include an offering of shares, the Exchange will expect IPO issuers to follow the “T+2” timetable set out in this *FINI Information Pack*, i.e. two business days between pricing and trading.

IPO Issuers will be required to seek the Exchange’s consent in advance if they expect a settlement period of “T+3” or longer for their IPO, and this timetable should be included in their prospectus. Circumstances in which a prolonged settlement period may be justified could include: the timing of Hong Kong or overseas public holidays; upon a regulator’s request; or other reasons that will be assessed by the regulators on a case-by-case basis. There may be circumstances where the regulators could require the IPO issuer to have a longer settlement period if there are reasons to require more time to review the placee lists.

If consent is obtained from the Exchange for a longer settlement period than “T+2”, this will also need to be disclosed in the IPO issuer’s prospectus and confirmed during *Step 1* of the FINI workflow described in *FAQ B1*. For such IPOs, the overall sequence of steps on FINI will largely remain the same, although there will be different cut-off timings for various steps. An illustrative “T+3” timetable for IPO settlement will be released by HKEX in due course for market participants’ reference.

### D2. Can IPO issuers choose a shorter settlement period than “T+2” for their listing?

For IPOs that include a public offer, “T+1” settlement will not be supported by FINI. For IPOs without a public offer, listings by introduction, and other categories of listing, the advised timetables for IPO settlement with FINI will be released by the Exchange in an updated *FINI Information Pack* in due course.

As noted in the *FINI Concept Paper Conclusions*, HKEX supports the idea of moving all new Hong Kong listings to “T+1” settlement over time, once the majority of market participants and infrastructures are ready.

### D3. Can IPO issuers close their international books early with FINI?

Yes. As long as there is no change to the listing date, IPO issuers and their advisers may close the international books, price the deal, submit placee information and associated documents as early as they wish. While certain steps depend on fixed scheduling (e.g. 3.5 day public offer, clawback, then balloting), it should be noted that most of the cut-off times shown in the “T+2” timetable are deadlines.

### D4. How does FINI handle a delay in an IPO issuer’s listing timetable?

Where there is any delay to the listing date published in the prospectus, IPO issuers are expected to consult the Listing Division on a new listing timetable as early as possible. Upon the Listing Division approving the delay, the [Principal Designated](#) Sponsor or Sponsor Counsel will be able to update FINI with the revised IPO timetable and other relevant information.

HKEX is currently considering the scenarios involving a delay in an IPO issuer’s listing timetable that would lead to the issuance of a supplemental announcement and / or supplemental prospectus and the relevant administrative arrangements. The Exchange expects to issue more detailed guidance for IPO issuers and market participants regarding the various listing timetable delay scenarios in due course.

The FINI system will support the necessary follow-up actions that may need to be taken by the [Principal Designated](#) Sponsor or Sponsor Counsel, or any other market participants affected by a listing delay, depending on which step of the settlement process the delay occurs at, and the nature of the delay.

#### **D5. How does FINI handle IPOs that do not proceed?**

If an IPO issuer decides to terminate or withdraw its listing after it has been initiated on FINI, the procedure will be similar to existing practice.

The [Principal Designated](#) Sponsor or Sponsor Counsel will update FINI with the issuer's decision to terminate / withdraw the IPO after it notifies the Exchange of the decision. Depending on the progress of the IPO at the time, HKSCC will help to unwind all necessary procedures. All FINI users will be notified of the termination or withdrawal through alerts.

#### **D6. How does FINI handle the clawback and reallocation mechanism?<sup>2</sup>**

FINI does not change the clawback mechanism (or if an IPO issuer has been granted a clawback waiver by the Listing Division), nor the Listing Division's guidance regarding the reallocation of shares from the international offer tranche to the public offer tranche.<sup>3</sup>

During offering initiation (*Step 1*), FINI will request the initiator ([Principal Designated](#) Sponsor or Sponsor Counsel) to confirm the terms governing the size of each tranche of the offering, including any applicable clawback trigger points or over-allocation limits, as disclosed in the issuer's prospectus.

In accordance with existing market practice, where an IPO includes a public offer, the over/under-subscription level of the public offer will be determined based on *the aggregate number of shares validly subscribed for by investors*, relative to the number of shares initially allocated to the public offer by the IPO issuer. This means that applications will be counted only if they (i) have been submitted through an official public offer application channel (EIPO or e-White); (ii) are supported by the requisite pre-funding (for EIPO applications, confirmed by the submitting CPs' Designated Bank; for e-White applications, confirmed by the Share Registrar); and (iii) are not identified as duplicate applications by the same investor.

These calculations will be finalised by the Share Registrar, who will enter the final over/under-subscription level of the public offer into FINI by 20.00 on the public offer book-close day (T-1). In the event of an under-subscribed public offer, any shares initially allocated to, but not subscribed for, in the public offer will be allocated back to the international offer tranche of the IPO, in accordance with the existing "claw-forward" mechanism. In the event of an oversubscribed public offer, FINI will display whether the conditions for a clawback trigger have been met (see *Step 3* in *FAQ B1*).

In any event, the [PLBDOC](#) will be asked to confirm the final allocation to the public and international offer tranches via FINI (see *Step 4* in *FAQ B1*).

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<sup>2</sup> Under Practice Note 18 of the Main Board Listing Rules and Practice Note 6 of the GEM Listing Rules.

<sup>3</sup> HKEX Guidance Letter HKEX-GL91-18: Reallocation of shares from placing tranche to the public subscription tranche in an initial public offer.



#### **D7. How does FINI handle the exercise of an over-allotment option?**

Where shares are over-allocated under the over-allotment option, the [PLBDOC](#) will need to update FINI on the number of additional shares over-allocated in accordance with the process described in *Step 4 of FAQ B1*.

When the stabilising manager exercises an over-allotment option after the listing date, the IPO issuer's advisers may submit to HKSCC through FINI the depository arrangements of the over-allocated shares to be deposited into CCASS. The [Principal Designated](#) Sponsor or Sponsor Counsel remains responsible for publishing the end of the stabilisation period announcement via ESS.

#### **D8. How does FINI handle the pricing flexibility mechanism?**

The pricing flexibility mechanism under HKEX-GL90-18 allows a downward price adjustment of no more than 10% below the indicative offer price or the bottom end of the indicative price range which is within a 30% spread, subject to appropriate disclosure in the prospectus, Mixed Media Offer (MMO) subscription forms (if used; see *FAQ D10*), formal notice, and the price reduction announcement.<sup>4</sup>

To support this mechanism, the details of any price flexibility mechanism applicable to the IPO will be captured at the offering initiation stage (*Step 1 in FAQ B1*). If the mechanism is triggered, the [PLBDOC](#) will confirm this during *Step 5*. In this event, FINI will generate the data tables for a price reduction announcement for the [Principal Designated](#) Sponsor and Sponsor Counsel. The relevant information on price reduction will also be captured in the allotment results data table generated by FINI in *Step 10*.

#### **D9. Is the guidance on using HKEX-ESS to submit Listing e-Forms and other documents compatible with the FINI workflows?**

The Listing Division will make relevant changes to related guidance letters and materials to facilitate the implementation of FINI. Related guidance materials will be updated prior to the roll-out of FINI, allowing market participants to familiarise themselves with the changes.<sup>5</sup>

#### **D10. Are Mixed Media Offers (MMOs) available with FINI?**

An MMO requires the issue of a printed application form without it being accompanied by a printed form prospectus relating to the offer.

As FINI does not support paper-based application forms, IPO issuers who wish to adopt an MMO will have to issue their own printed application forms in compliance with guidance letter(s) published by the Listing Division, and rely on CPs and / or Share Registrars to input orders from subscribers who use such forms

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<sup>4</sup> HKEX Guidance Letter HKEX-GL90-18: Pricing Flexibility for Initial Public Offerings ("IPO").

<sup>5</sup> HKEX Guidance Letter HKEX-GL55-13: Guidance on Documentary Requirements and Administrative Matters for New Listing Applications (Equity).

into FINI (for CPs) or their own order-taking systems (for Share Registrars) directly.<sup>6</sup> Otherwise, all of the remaining steps in the FINI workflow will apply to IPOs that adopt an MMO.<sup>7</sup>

#### **D11. Does FINI have an impact on the prospectus registration requirement?**

No. Neither FINI nor the shortened IPO settlement process changes the prospectus registration requirements and procedures.

#### **D12. Do the requirements for submission of placee lists and related documents change with FINI?**

The introduction of FINI does not change the regulatory requirement for the submission of placee lists and related documents. It does, however, affect placee lists' content and the submission/review workflow.

##### Content

In FINI, the standard format of placee lists will be adjusted slightly from its current format to reflect, for instance, new "tags" such as connected clients and connected persons; as well as to align the investor identification data format for both individual and corporate placees with that of the public offer tranche, for consistency and completeness.

##### Submission/review workflow

FINI will digitalise the placee list submission and review process as set out in *Steps 8-10 of FAQ B1*.

Distributors can input and edit placee information either directly (line by line) via FINI's web interface, or by uploading a pre-populated, FINI-compatible placee list file (based on an excel template to be provided by the Exchange) via the same interface. Regardless of the input method, the required data will be identical. Submission of placee lists via email, letter, fax or other methods outside of FINI will no longer be accepted.

The FINI system is designed to facilitate the placee list submission process as follows:

- i. FINI will track and reconcile the total number of shares being submitted by each Distributor against a dynamic control list overseen by the ~~Principal Lead Broker~~DOC, so that any missing or incomplete submissions can be quickly identified.
- ii. FINI will check each placee list upon submission to ensure that mandatory fields have been filled. This will save time for both Distributors and regulators on communicating back and forth, and will help to avoid last-minute delays. FINI will prevent incomplete submissions and flag any incomplete fields to the submitting Distributor.
- iii. Distributors may "tag" placees based on specific circumstances, including cornerstone investors, existing or past employees of the issuer (individuals), connected clients/connected persons of the issuer, discretionary managed portfolios (corporate), discretionary trusts (corporate), PRC governmental body (corporate), and non-SFC authorised collective investment schemes (corporate). Any supporting information will be uploaded through FINI.

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<sup>6</sup> HKEX Guidance Letters HKEX-GL81-15: Guidance on Mixed Media Offer; HKEX-GL18-10: Guidance on publicity materials, e-IPO advertisements and Mixed Media Offer (MMO); and HKEX-GL55-13: Guidance on Documentary Requirements and Administrative Matters for IPO Applications (Equity).

<sup>7</sup> For IPO issuers who choose to adopt an MMO pursuant to the Companies (Exemption of Companies and Prospectuses from Compliance with Provisions) Notice (Cap. 32L laws of Hong Kong).

- iv. Cases where an individual placee (or beneficial owner of a corporate placee) is found by FINI to be a suspected or actual duplicate of another prospective placee or a successful public offer applicant in the same IPO will be flagged to the submitting Distributor (see also [FAQ D17](#)).
- v. The Listing Division and the SFC will provide any comments on the placee lists directly via FINI to Distributors and, where required, to all Sponsors and the [PLBDOC](#). Comments will be viewable by the the Listing Division and the SFC will be able to view all comments to avoid duplication.
- vi. The regulators will receive notifications when Distributors submit placee lists, and similarly, Distributors will be notified when regulators raise comments and approve placee lists.
- vii. Outstanding placee lists will be flagged to the [PLBDOC](#), Distributors and regulators (via on-screen notification messages and by e-mail) at pre-set time intervals before the placee list submission deadline for each particular IPO, saving the manual effort of reminding parties.
- viii. FINI will automatically generate relevant statistics based on placee lists submitted by Distributors, and will determine placee and subscription concentrations in terms of the number of shares held by different categories of placees. Certain additional information, such as the top 25 shareholders of a listing applicant upon listing, will not be generated by FINI and will be required to be completed by the Sponsors offline and uploaded to FINI for completeness.
- ix. FINI will automatically generate marketing statements and letters of independence for Distributors, based on their submitted placee lists. These can be submitted electronically via FINI (see [FAQ D13](#)).
- x. Immediately after the clearance of placee allocations, FINI will generate a bilingual allotment results data table for the responsible parties' review. The finalised allotment results announcement should be submitted to the Listing Division via FINI and made available on the e-Submission System ("ESS") after obtaining clearance from the regulators.

### Timing

In the "T+2" settlement timetable, authorised Distributors (i.e. those added by the [Principal Designated Sponsor](#) or Sponsor Counsel to the list of Distributors with access to a particular IPO on FINI) will be allowed to input placee information into the system as early as the initiation of the offering (T-4, 9.00, [Step 2](#) in [FAQ B1](#)).

The formal submission of placee lists and related documents to the regulators for review and clearance will occur after [Step 4](#) and no later than T+1, 10.00 ([Step 8](#)). Unless there are exceptional circumstances, all submissions of placee lists are expected to be final. No amendment is allowed except in connection with a response to the regulators' comments. In such cases, Distributors will not need to re-upload their entire placee list, but may simply amend the affected placee entry, or entries, directly via their FINI interface.

### Pre-vetting

To enable IPO issuers to achieve an optimal timetable, the Listing Division has published guidance HKEX-GL110-21 "[Pre-vetting for placing to connected clients in an initial public offering](#)" on 5 March 2021 to allow any proposed placing of securities to connected clients in an IPO to be pre-vetted by the regulators to expedite the placee vetting process and avoid potential delay of the IPO issuer's IPO settlement timetable. This pre-vetting process will remain in place under FINI, and such pre-vetting will be carried out by the Listing Division outside of the FINI system.

**D13. Which forms and documents required by the Listing Division will be handled via FINI?**

The following forms will be submitted electronically via FINI:

Main Board form ref.	GEM form ref.	Description	Submitting Parties	Start time	Deadline
<b>Documents generated automatically by the FINI system</b>					
<a href="#">FFD003M</a>	<a href="#">FF017G</a>	IPO - Form D - Marketing Statement	<a href="#">PLBDOC</a> ; Distributors	After Steps 8 + 9	Step 11
N/A	N/A	Letter of independence from the distributors			
<a href="#">M401</a>	<a href="#">G401</a>	Main Board: IPO - Form E - Sponsor's Declaration GEM Board: IPO - Form I - Sponsor's Declaration of Compliance concerning a new applicant			
<a href="#">M402</a>	<a href="#">G402</a>	IPO - Notification of Submission of Transaction Levy, Trading Fee and Brokerage	<a href="#">Principal Designated</a> Sponsor or Sponsor Counsel		
<b>Documents partially generated by the FINI system</b>					
<a href="#">FFD004M</a>	<a href="#">FF018G</a>	Main Board: IPO – Form F – Issuer's Declaration GEM Board: IPO – Form 5E – Declaration of Compliance	Issuer Counsel	After Steps 8 + 9	Step 11

The Listing Division will update the above table where necessary. The parties submitting these forms will be required to authorise electronic execution and submission of the forms via FINI, except for the *Issuer's Declaration* (Form F/Form 5E), which will need to be downloaded for a physical signature by the IPO issuer's director and secretary and then uploaded via FINI.

**D14. Are documents submitted through FINI received by the Listing Division and the SFC at the same time and covered as part of the dual filing arrangements?**

Yes. The Listing Division and the SFC will have the same viewing rights on FINI for all regulatory submissions such as the placee lists, Marketing Statements, Sponsor's Declarations and Letters of Independence. Both regulators will receive real-time notifications on documents that are submitted via FINI. Pending further legal advice, the Listing Division will make necessary changes to certain documents to include the specific signature requirements applicable under the Electronic Transactions Ordinance.

**D15. What are the viewing rights of FINI users?**

In respect of non-public information submitted to FINI, FINI is designed to limit data viewing and editing permissions to the relevant FINI users who are responsible for providing, or acting on, such data. For example, currently, IPO Sponsors and the Sponsor Counsel do not ordinarily have access to the placee lists, and therefore they will not have viewing rights to such information on FINI.

Publicly available information as published in the IPO issuer's prospectus will be available to all FINI users.

Set out below is an indicative summary of information access for various FINI users in relation to key types of data that will be available on FINI during the IPO settlement process. Based on further system design, a more detailed schedule of permissions will be published as part of the FINI User Guide.

FINI user category or sub-category	FINI Key	IPO reference data	Offer size and final IPO price	Placee list information	Regulatory submissions
<a href="#">Principal Designated Sponsor</a>	○	● or ○*	○		● or ○*
Other Sponsor(s)	○	○	○		○
Sponsor Counsel	○*	● or ○*	○**		● or ○*
Issuer Counsel		○**	○**		●
<a href="#">PLBDOC</a>		○**	●	●	●
Distributors		○**	○**	●	●
Share Registrar		○**	○**		
CPs		○**	○**		
DBs		○**	○**		
Listing Division	●	○**	○**	○**	○**
SFC		○**	○**	○**	○**

● - user has viewing and edit rights

○ - user has viewing rights only, and where blank – user has no viewing rights.

\* - depends if the function is delegated to Sponsor Counsel by the [Principal Designated Sponsor](#).

\*\* - user has viewing rights only after the relevant data has been confirmed in FINI by its submitter.

#### D16. How does FINI accommodate non-syndicate Distributors or brokers submitting relevant documents in an IPO?

In practice it is not uncommon for Distributors who were not originally included in the IPO issuer's syndicate to receive shares for further distribution and thus be required to submit placee information during the course of the international offer as required under the Listing Rules.

FINI provides a flexible syndicate management function that the [Principal Designated Sponsor](#) or Sponsor Counsel may use at any time during the offering to add or remove Distributors from the list of authorised FINI users in respect of a particular IPO. This enables these parties to submit placee lists to the regulators. Any party who wishes to participate in the placing process as a Distributor will, however, need to register as a FINI user based on the eligibility requirements (see [FAQ C1](#)) and the on-boarding process, before they can perform these functions on FINI.

While on-boarding procedures are not expected to be overly time-consuming provided the candidate has the necessary supporting documentation, HKEX will nonetheless encourage prospective Distributors to apply to be on-boarded to FINI in advance of being appointed as a member of the IPO issuer's syndicate.

## D17. How does FINI handle multiple placees submitted by the same or different Distributors?

For placings to the **international tranche** of an IPO, FINI will adopt the following approach:

- i. If individual placees (or beneficial owners of corporate placees) are found by FINI to have already been submitted by *the same* distributor in the same IPO, these will be flagged by the system to the submitting ~~distributor, principal lead broker~~[Distributor, DOC](#) and the regulators. The distributor will be permitted to amend the relevant placee entries in FINI, if needed (without the need to re-upload the entire file). If no amendment is made and the relevant placee submissions are considered by the regulators to represent the same investor, these placees will be treated as being one placee when determining whether the IPO issuer meets the requirements under the Listing Rules relating to an adequate spread of shareholders, and the minimum number of placees and shareholders, among others;
- ii. If individual placees (or beneficial owners of corporate placees) are found by FINI to have already been submitted by *a different* distributor in the same IPO, these will be flagged by the system to the relevant submitting ~~distributors, principal lead broker~~[Distributors, DOC](#) and the regulators. The procedure in [99\(i\)](#) will be followed; and
- iii. If individual placees (or beneficial owners of corporate placees) are found by FINI to have already been *allotted* shares in the public offer tranche of the same IPO, then the affected subscribers' allotment in the public offer tranche will take precedence and remain valid, while their placee list submission will be invalidated and the relevant ~~distributor~~[Distributor](#) and ~~principal lead broker~~[DOC](#) will be notified. This is to avoid having to re-ballot the public offer tranche, which would cause a delay to the IPO issuer's listing timetable. The syndicate will be responsible for re-allocating any shares that have been provisionally allocated to a placee that has been invalidated in this manner.

Please refer to [FAQ E11](#) for FINI's handling of multiple applications for shares by the same investor within the **public offer tranche**.

## D18. How does the SFC's Proposed Code of Conduct on Bookbuilding and Placing Activities affect FINI's overall design? [Last Update: 30 November 2021]

The SFC's standards of conduct expected of intermediaries involved in bookbuilding, pricing, allocation and placing activities will not materially change the T+2 timetable set out in *FINI Information Pack*. The conclusions paper was published on 29 October 2021.<sup>8</sup> When the offering is initiated (in *Step 1* of [FAQ B1](#)), a Designated Overall Coordinator ("DOC") (previously referred to as the "Principal Lead Broker", or "PLB") must be appointed to confirm the final offer size, tranche allocations and final pricing, as well as manage the control list of distributors' share allocations. The remaining members of the equity syndicate, including other Overall Coordinators ("OCs"), Capital Market Intermediaries ("CMIs") and non-syndicate intermediaries would be assigned as Distributors for purposes of submitting placee lists, marketing statements and letters of independence (see *Step 8* of [FAQ B1](#)).

The Listing Division is working with the SFC to finalise any changes that may be made to FINI in this aspect, and will also introduce appropriate amendments to the Listing Rules to facilitate the implementation of FINI, including potential changes to the required disclosures within the forms and documents in [FAQ D13](#).

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<sup>8</sup> SFC website, "Consultation Conclusions on (i) the Proposed Code of Conduct on Bookbuilding and Placing Activities in Equity Capital Market and Debt Capital Market Transactions and (ii) the "Sponsor Coupling" Proposal", 29 October 2021.

## E. Public offer operations

### E1. Is an investor's eligibility to subscribe for public offer shares unchanged under FINI?

Yes. The eligibility of investors to subscribe for IPO shares is determined by the IPO issuer and set out in its prospectus – for example, an IPO issuer might prohibit anyone who is a “natural person” of a certain jurisdiction from subscribing for its shares. The IPO issuer is responsible for determining the eligible jurisdictions in which natural persons may subscribe for its shares, and adhering to the local securities laws of the jurisdiction in which the IPO is conducted. Potential subscribers are advised to read the prospectus for any restrictions before subscribing, and are expected to provide an undertaking to his / her broker or Share Registrar (as part of the terms of their application) that they are not in contravention of any such restrictions set out in the IPO issuer's prospectus.

### E2. Does the threshold of HKD 5 million that is used to distinguish subscriptions between 'Pool A' and 'Pool B' under the public offer tranche remain unchanged under FINI?

Yes, the HKD 5 million threshold remains unchanged.

### E3. Are paper-based subscription forms accepted in FINI? [\[Last Update: 30 November 2021\]](#)

No. From 5 July 2021 onwards, investors in the public offer tranche of all IPOs in Hong Kong are required to subscribe through electronic channels, except for MMOs (see also *FAQ D10*).<sup>9</sup>

[HKEX has engaged in further discussions with the Federation of Share Registrars, and reached a consensus to further standardise the settlement process of preferential offerings and employee offerings, and offer qualifying applicants only electronic subscription channels upon FINI's launch. IPO issuers should consult their appointed share registrar on the practical arrangements in advance of proceeding with their offerings.](#)

### E4. Public offer applicants sometimes increase the size of their applications to increase their chances of a share allotment. How might FINI affect this?

From a public offer applicant's perspective, FINI does not change the application process for public offer shares. As is the case today, investors will continue to subscribe through a broker or the Share Registrar, and will bear the cost associated with the application and its funding, according to their commercial arrangements with the respective intermediary.

High over-subscription levels for certain Hong Kong IPOs are common today. This phenomenon is likely to continue with FINI, but it will no longer necessarily drive the market-wide “lock-up” of pre-funding or money settlement volume in a linear manner (see *FAQ E14*).

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<sup>9</sup> [HKEX website](#): “Publication of Consultation Conclusions Paper on Paperless Listing & Subscription Regime, Online Display of Documents and Reduction of the Types of Documents on Display”, 18 December 2020.

## E5. Can investors still obtain share certificates under FINI?

Yes. Successful public offer applicants who are allotted shares that have been registered in their own names through the “e-White” subscription channel may collect their share certificates or have the share certificates dispatched by the Share Registrar, as per current practice. Share Registrars will advise their clients of the operational arrangements.

## E6. Can HKSCC Investor Participants (“IPs”) subscribe for IPOs using FINI?

No. IP participation levels in Hong Kong public offers have been relatively low, representing less than 0.17% of the total number of subscriptions in the last 3 years (2018-2020). When FINI is introduced, the CCASS “EIPO” subscription function for IPs will be discontinued. IPs can subscribe to IPOs via CPs or Share Registrars. HKEX will consider waiving transfer charges for IPO shares that IPs acquire through a CP or Share Registrar that are then moved into their IP accounts if they wish to.

HKEX will consider re-introducing a public offer subscription service for IPs, in conjunction with a broader reform of the IP model under the proposed Hong Kong USM regime.

## E7. What kind of investor ID is needed to subscribe for shares through FINI? Is it different from today’s market practice? [\[Last Update: 30 November 2021\]](#)

As described in the *FINI Concept Paper Conclusions*, HKEX intends to closely align the investor identification requirements for all IPO subscribers with those set out in the [proposed introduction of an Investor identification regime at trading level for the securities market in Hong Kong \(the “HKIDR”\) that](#)), [which was announced for market consultation concluded](#) by the SFC on [4 December 2020-10 August 2021](#).<sup>10</sup>

~~This means that (subject to the HKIDR’s finalised standards and requirements) submitting~~ [The submission of](#) the information shown in the table below ~~would~~[will](#) become mandatory for investors who subscribe for shares in *either the public offer tranche (EIPO or “e-White” channels) or the international offer tranche* of a Hong Kong IPO via FINI. IPO subscribers in either tranche may also be required to provide certain additional details that may be prescribed and / or announced to the market by the regulators from time to time.

For individual subscribers	For corporate subscribers
<ul style="list-style-type: none"><li>▪ <b>Full name</b> as shown on their identity document.</li><li>▪ Identity document’s <b>issuing country or jurisdiction</b>.</li><li>▪ <b>Identity document type</b>, with order of priority:<ul style="list-style-type: none"><li>i. HKID card; <a href="#">or</a></li><li>ii. National identification document; <a href="#">or</a></li><li>iii. Passport; and</li></ul></li><li>▪ <b>Identity document number</b>.</li></ul>	<ul style="list-style-type: none"><li>▪ <b>Full name</b> as shown on its identity document.</li><li>▪ Identity document’s <b>issuing country or jurisdiction</b>.</li><li>▪ <b>Identity document type</b>, with order of priority:<ul style="list-style-type: none"><li>i. LEI registration document; <a href="#">or</a></li><li>ii. Certificate of incorporation; <a href="#">or</a></li><li>iii. Business registration certificate; <a href="#">or</a></li><li>iv. Other equivalent documents; and</li></ul></li><li>▪ <b>Identity document number</b>.</li></ul>

<sup>10</sup> [SFC website, “Consultation SFC website, “Consultation conclusions](#) on proposals to (1) implement an investor identification regime at trading level for the securities market in Hong Kong and (2) introduce an over-the-counter securities transactions reporting regime for shares listed on the Stock Exchange of Hong Kong”, [4 December 2020-10 August 2021](#).



Also note:

- The subscriber's primary name as shown on their identity document should be used. Either English or Chinese names (or both, if available) will be accepted by the FINI system.
- If the subscriber is a trust, the client identification data ("CID") of the trustee, as set out above, will be required.
- If the trust is an investment fund (i.e. a collective investment scheme, or CIS), the CID of the asset management company or the individual fund, which has opened a trading account with the broker will be required, as above.
- In a joint account application, the above details for up to four joint holders of that account will be required.

HKEX believes that this alignment of standards for investor identification between the Exchange's primary and secondary equity markets will reduce the operational, technical and legal readiness efforts of market participants for the introduction of the HKIDR and FINI reforms; as well as ~~addressing data-sharing concerns among intermediaries and~~ enabling [the use of BCANs for EIPO subscriptions \(see FAQ E10\)](#) and effective identification of multiple subscriptions at the investor level (see ~~FAQs E10 and~~ [FAQ E11](#)).

#### **E8. What is an acceptable 'National identification document'?**

A document or ID card issued by the government authority of a country / jurisdiction, or any other official identity document. Driver's licenses will not be accepted.

#### **E9. If an investor has multiple valid identity documents, which one should be used to apply for public offer shares?**

Documents should be used in the order set out in [FAQ E7](#). In the case of individual subscribers, this means that investors who hold a valid HKID **must** use that HKID number (rather than, say, a passport number) when subscribing for shares, while in the case of corporate subscribers, the company's LEI number should be used if it has one. Intermediaries whose clients elect to use a non-HKID identity document to make an application for public offer shares will be required to seek client confirmations that they do not possess a valid HKID as part of their initial know-your-client checks and ongoing monitoring.

Other identity documents should not be used for further applications by the same investor within the same IPO.

#### **E10. What if a CP submitting the application to HKSCC does not have a direct relationship with the underlying investor, and is only acting as a nominee / lender to another Licensed Corporation or Registered Institution? [\[Last Update: 30 November 2021\]](#)**

~~In alignment with the HKIDR regime (see [FAQ E7](#)), HKEX is exploring whether FINI may allow a CP to identify an investor who is not a direct client with the Broker to Client Assigned Number ("BCAN") that has been assigned to that investor by the Licensed Corporation ("LC") or Registered Institution ("RI") from which the CP receives that EIPO order. This measure would address data-sharing concerns among intermediaries, while still enabling FINI to identify any actual or suspected multiple applications for shares at the underlying investor level. CPs would not need to assign any further BCAN of their own when handling such orders.~~

~~For their part, LCs and RIs would be able to use the same format of BCAN-CID mapping file for HKIDR purposes and for FINI purposes, thus covering their activities across Hong Kong's primary and secondary equity markets through one technical infrastructure.~~

~~Work remains to be done on aligning the relevant BCAN-CID mapping file specifications and submission mechanism; obtaining the necessary client consent by intermediaries; and distinction of the purpose of data collection, usage and retention. HKEX will study these questions, working closely with the SFC, pending the finalisation of the HKIDR regime, the feasibility of adopting the use of BCANs in FINI and further discussion with the SFC, and will update the market further on the specific arrangements for FINI in due course.~~

~~In alignment with the HKIDR regime (see *FAQ E7*) and a subsequent discussion with the SFC, HKEX will allow Licensed Corporations (“LCs”) and Registered Institutions (“RIs”), on an optional basis, to identify subscribers for shares in public offers with the BCAN assigned to the relevant clients under the HKIDR. CPs submitting EIPO subscriptions on behalf of another LC or RI may input “BCAN” as the identity document type and the relevant client’s BCAN in the identity document number (without providing the full name or identity document’s issuing country or jurisdiction).~~

~~After the public offer book-close, FINI will leverage on BCAN to retrieve the underlying CID from SEHK for identifying duplicates within the EIPO application list and pass the information to the Share Registrar for further de-duplication. The submitting CP will have no permission to view the underlying CID via FINI.~~

~~If an LC or RI intends to offer EIPO subscription services to a client and wishes to use the client’s BCAN as a client identifier when submitting the subscription to HKSCC, it must first obtain the client’s express prior written consent. Further information on the relevant consent requirements can be found in SEHK’s circular and HKSCC’s circular dated 26 November 2021.~~

~~The purposes for which subscribers’ personal data will be used are set out in the personal information collection statement (PICS) in the prospectus of an IPO issuer. For reference only, a revised template of PICS (in draft form) that will be included in a Listing Guidance Letter which sets out, among others, the guidance on what information the Listing Division expects in the “How to Apply for the Hong Kong Public Offer Shares” section of a listing document upon the launch of FINI is set forth in the Appendices to both circulars cited above. An IPO issuer must ensure that, in substance, the PICS disclosed in its prospectus shall cover at least the purposes set out in sections 3 and 4 of the PICS template.~~

#### **E11. How does FINI handle multiple applications for shares by the same investor?**

Under Main Board Listing Rule 10.09 (or GEM Listing Rules 13.21 to 13.24), IPO issuers, their directors, sponsors and underwriters must take reasonable steps to ensure that multiple or suspected multiple applications are identified and rejected, where securities are offered to the public for subscription or purchase.

FINI will help IPO issuers and their share registrars address multiple applications by subscribers in the public offer tranche. FINI will firstly run an algorithm after the public offer book-close (i.e. the end of *Step 2* in *FAQ B1*) to identify any instances of multiple applications in the EIPO application list, based on the CID of each subscriber as described in the table in *FAQ E7* above. If any actual or suspected multiple applications are found, the affected applications will be removed from further processing and flagged to the IPO issuer’s Share Registrar by HKSCC in the EIPO application file. The Share Registrar will perform an analogous process within the e-White application list, and between the EIPO and e-White application lists using the same algorithm, such that all instances of actual or suspected multiple applications in the public offer tranche are detected and removed before balloting.

Please refer to *FAQ D17* for FINI’s handling of duplications between allotment recipients in the public offer and places in the international offer tranche of the same IPO.

**E12. Are CPs allowed to withdraw or amend their EIPO applications in FINI during the public offer?**

Yes, at any time before the public offer book-close time.

**E13. Will FINI adopt the HKIDR investor ID standards if the HKIDR initiative is amended, delayed or cancelled? [\[Last Update: 30 November 2021\]](#)**

If the HKIDR investor ID standards are amended from those ~~proposed~~[concluded](#) by the SFC in ~~December 2020~~[August 2021](#), FINI will adopt such amended standards as long as they remain suitable for meeting the regulators' requirements in respect of investor identification for IPO subscriptions, and it is practicable to make such amendments with sufficient advance time before the scheduled launch of FINI.

If the HKIDR initiative is delayed or cancelled, HKEX will consider whether any changes are required to the investor identification standards that FINI will adopt, and this will be communicated to prospective FINI users well ahead of the FINI platform's launch. The roll-out of FINI will not be dependent on the introduction of the HKIDR initiative.

**E14. Why is HKSCC changing the EIPO pre-funding mechanism with FINI?**

In FINI, the concept of pre-funding is retained, but the mechanics of it are amended for the following reasons.

*The first amendment is to confirm public offer pre-funding without interbank transfers.* Rather than needing to transfer subscription funds to the issuer's receiving bank(s) as evidence of their sufficiency, CPs will instead be required by HKSCC to lock these subscription funds on deposit with their own DB before the ballot (see *Step 3*). Only the portion of these funds required to settle each CP's actual share allotment will then be collected by the issuer's receiving bank(s) after the ballot (see *Step 7*).

The intention of this change to market practice is to reduce the total duration of "lock-up" of EIPO application funds and thus enable considerably faster release and recycling of unused pre-funding. It will also help to reduce the potentially significant counterparty and concentration exposures that the incumbent interbank transfer mechanism can create.

*The second amendment is to cap a CP's pre-funding requirements at its maximum allotment exposure.* No CP will be required by HKSCC to hold on deposit in respect of a particular IPO an amount of funds that exceeds its highest possible settlement obligation to the issuer (i.e. its allotment of shares if it receives all of the available supply, and no other CP receives any allotment at all). This mechanism, which CPs will be offered to opt in to use, is intended to help reduce the high amounts of liquidity that are "locked up" in Hong Kong's banking system during large and / or highly popular "mega" IPOs in our market.

For a more complete discussion on the merits of these reforms and the market participants' views during consultation, please refer to the *FINI Concept Paper Conclusions, Section 2.2*.

**E15. How does HKSCC determine a CP's EIPO pre-funding requirement in FINI?**

Every CP will be offered the option by HKSCC to opt in to using a "compressed" pre-funding requirement ("PFR") calculation in respect of its EIPO applications, when on-boarding to FINI (or at any time thereafter). Once opted in, the opt-in covers all IPOs conducted via FINI, without the need for the CP to make a separate election for every IPO. Once opted in, a CP may opt out at any time.

HKSCC will calculate a CP's PFR in respect of each IPO as follows:

- i. If the CP has opted in to compressed pre-funding,  $PFR_{CP} = \min(D_{CP}, PO_{MAX})$
- ii. If the CP has not opted in to compressed pre-funding,  $PFR_{CP} = D_{CP}$

where  $D_{CP}$  denotes the total value of the CP's EIPO application list for that IPO (a CP's application list may represent orders from multiple other brokers and indirect or direct clients), and  $PO_{MAX}$  denotes the highest value of shares that an issuer is able to allocate to the public offer tranche as a whole, assuming the triggering of the highest available clawback level and other discretionary re-allocations of shares, as may be permitted under the terms of the offering disclosed in the issuer's IPO prospectus.  $PO_{MAX}$  can always be calculated in advance of a public offer opening, and will be displayed for CPs' reference in FINI.

The pre-funding requirement will be a cash requirement, and this requirement must be fulfilled by way of a confirmation from the CP's Designated Bank.

#### E16. Can you give some examples of the PFR calculation?

The two examples below illustrate the PFR formula, using actual subscription and allotment data from two relatively recent Hong Kong IPOs that included a public offer. Calculations for three anonymised CPs are shown in each case. The first public offer was heavily oversubscribed, and the second one was not.

Ping An GoodDoctor (1833) (all figures in HKD millions)			
Initial public offer allotment	576	6.5% of the IPO size	
$PO_{MAX}$   Upper allotment limit	2,215	25% of the IPO size, assuming largest clawback	
Total application value	376,506	654x oversubscribed	
Final public offer allotment value	2,215	25% of the IPO due to >95x oversubscription	
<b>Pro forma PFR:</b>	<b>CP 'A'</b>	<b>CP 'B'</b>	<b>CP 'C'</b>
$D_{CP}$   CP's total EIPO application value	26,116	18,092	1,192
$PFR = \min(D_{CP}, PO_{max})$ = if opted in to compressed pre-funding	2,215 ( $PO_{max} < D_{CPa}$ )	2,215 ( $PO_{max} < D_{CPb}$ )	1,192 ( $PO_{max} > D_{CPc}$ )
$PFR = D_{CP}$ = if opted out of compressed pre-funding	26,116	18,092	1,192
<b>CP's actual EIPO allotment value (via ballot)</b>	<b>219</b>	<b>95</b>	<b>12</b>

China Tower (788) (all figures in HKD millions)			
Initial public offer allotment	3,440	5% of the IPO size	
$PO_{MAX}$   Upper allotment limit	13,761	20% of the IPO size, assuming largest clawback	
Total application value	4,673	1.36x oversubscribed	
Final public offer allotment value	2,743	5% of the IPO due to <15x oversubscription*	
<b>Pro forma PFR:</b>	<b>CP 'A'</b>	<b>CP 'B'</b>	<b>CP 'C'</b>
$D_{CP}$   CP's total EIPO application value	33.8	23.9	0.157
$PFR = \min(D_{CP}, PO_{max})$ = if opted in to compressed pre-funding	33.8 ( $PO_{max} > D_{CPa}$ )	23.9 ( $PO_{max} > D_{CPb}$ )	0.157 ( $PO_{max} > D_{CPc}$ )
$PFR = D_{CP}$ = if opted out of compressed pre-funding	33.8	23.9	0.157
<b>CP's actual EIPO allotment value (via ballot)</b>	<b>17.2</b>	<b>12.2</b>	<b>0.092</b>

\* Final share allotment value < initial public offer allotment because the final offer price was lower than the top of the offer price range.

In short, the higher the oversubscription level of the public offer, the greater the chance of a CP's PFR being reduced through pre-funding compression. Note that in all possible scenarios, a CP's PFR will always be sufficient to cover the entire mathematically possible range of share allotments that it may receive in the public offer ballot.

#### E17. How often will PO<sub>MAX</sub> be triggered?

Historic simulation based on all Hong Kong IPOs completed in 2018-20 suggests that a CP's application value would exceed PO<sub>MAX</sub> only 2.2% of the time. However, the amount of PFR reduction realised in those cases amounts to 71% of total pre-funding "locked up" over that time period, since the large and highly popular "mega" IPOs were those most affected.

To illustrate, the below table shows the pro forma aggregate PFR (for all CPs combined), as simulated based on subscription data for the ten most popular recent Hong Kong IPOs by value of "locked-up" public offer application funds:

IPO	PFR "locked-up" (HKD bn) actual historic figure	FINI Pro forma PFR (HKD bn) with compressed pre-funding	% saving	Actual allotment (HKD bn)
<b>Nongfu Spring (9633)</b>	678	126	81%	2.3
<b>JD Health (6618)</b>	574	101	82%	3.0
<b>Ming Yuan Cloud (909)</b>	402	96	76%	2.4
<b>PA GoodDoctor (1833)</b>	377	61	84%	2.2
<b>JHBP (6998)</b>	363	62	83%	1.5
<b>Kangji Medical (9997)</b>	313	58	81%	1.6
<b>Blue Moon Group (6993)</b>	299	102	66%	4.9
<b>Ocumension (1477)</b>	297	36	88%	0.8
<b>Joy Spreader (6988)</b>	288	32	89%	0.8
<b>JD (9618)</b>	284	99	65%	3.7
<b>Top 10 sub-total</b>	3,875	773	80%	23.2
<b>All 2018-20 IPOs total</b>	9,946	2,912	71%	159.1

#### E18. As a CP / broker, how much should I ask my investors to pre-fund?

As is the case today, CPs are obligated to ensure that their clients have sufficient funds (cash balance or borrowed credit) to be able to support the settlement of their respective public offer subscription in full, when accepting their orders.

In practice, this means that some CPs / brokers may require their clients to pre-fund their applications in full, or may collect a percentage of clients' application values as margin and provide credit to cover the rest, alongside appropriate collateral arrangements over any shares that may be allotted to those clients.

A broker's business and financing model with respect to its public offer subscription service will remain a business decision for the broker, and HKSCC will not dictate the mix of funding sources that CPs should use to meet their PFR. The management of clients' money and the conduct of IPO lending activities are governed by existing regulations and guidelines under the auspices of the SFC (in respect of LCs and RIs)

and the HKMA (in respect of RIs), and intermediaries should continue to ensure that they remain in compliance with the applicable regulatory requirements under FINI as well.

*The key difference in the FINI model is that not all of the funding that is arranged by CPs to support their clients' applications will necessarily be required to be fully drawn down and deposited with its DB in order to meet that CP's PFR, as calculated by HKSCC. For example, with FINI, credit to investors might be extended on a contingent basis – like a standby facility – rather than on a fully draw-down basis.*

Based on market feedback to the *FINI Concept Paper*, it is HKEX's belief that this new mechanism will allow many Hong Kong brokers and banks to support their clients' demand for EIPO shares with considerably smaller "lock-up" of liquid funds in "mega" IPOs, which may potentially also translate into lower EIPO funding costs that more realistically reflect the actual credit consumption involved.

#### **E19. Can a CP meet their PFR with a mixture of cash and credit facilities?**

The CP's PFR will need to be met with a cash balance which is on deposit at the CP's DB and has been specifically locked by the DB for the purpose of meeting the CP's PFR.

#### **E20. How does margin order pre-funding work under FINI?**

Pre-funding requirements are calculated by HKSCC at the CP level, and this will remain the same with FINI. As per current market practice, the CP entity of the lending bank will be expected to send a broker's EIPO application list in respect of its margin-funded public offer orders to HKSCC in its (the lending bank's) own name. The PFR associated with such orders will therefore be calculated by FINI as part of the total PFR of the CP entity of the lending bank in respect of each particular IPO. By implication, brokers may continue to use multiple lending banks to support their IPO margin orders under FINI, if they wish to.

#### **E21. As a DB, how should I set up the operational arrangements for locking the PFR of CPs?**

**[\[Last Update: 30 November 2021\]](#)**

~~HKEX is aware of a range of "fund locking" mechanisms that are available to Hong Kong banks, ranging from temporary in-account freezing of funds, to intrabank transfers into a designated account. To align market practice and expectations, HKEX will conduct a workshop with the Hong Kong Association of Banks (including all designated CCASS EIPO settlement banks) to gather input on this topic and agree a suitable operating arrangement that is also aligned with the regulatory expectations of the HKMA and the SFC. Details of this arrangement (including CPs' FINI readiness requirements with their DBs, the provision of direct debit authorisations to HKSCC and other details) will be published in the *FINI Information Pack* as soon as practicable.~~

~~Regardless of the fund locking mechanism to be used, it is expected that each CP will be the beneficial owner of its EIPO application monies that are set aside for meeting its PFR, until its actual share allotment value is paid to the issuer's receiving bank(s), and the balance of its unused PFR is released by its DB.~~

~~After extensive engagement with the HKAB and HKMA, it is decided that the PFR of CPs shall be locked at a nominee bank account set up in the name of the DB or in the name of a nominee company controlled by the DB. DBs are also required to authorise HKSCC to generate payment instructions and effect transfers from the nominee bank account to the payee(s) specified in the payment instructions.~~

DBs are expected to lock the PFR of their CP clients across all IPOs within the nominee bank account. For example, if the DB has two CP clients subscribing to 3 IPOs, all 6 sets of PFRs should be locked within the same nominee bank account (see [FAQ E22](#)).

Unless a DB has agreed to hold the funds in the nominee bank account on trust, once paid into the account, the funds are owned by the DB operating the account. Any claim to be repaid, where appropriate, out of the account, will be the claims of the account holder(s). In the absence of any trust, the account holder's claim would be an unsecured pari passu claim.

## **E22. How are DBs meant to confirm a CP's PFR status to FINI? [\[Last Update: 30 November 2021\]](#)**

~~During *Step 3* in the IPO settlement timetable, [HKSCC will calculate](#) each CP's ~~DB will be asked to confirm~~ PFR in accordance with [FAQ E15](#) and broadcast the information to HKSCC (via FINI API) that DBs via the FINI API and FINI interface. The DB will then be required to verify whether the PFR of the CP it serves is available and has been set aside accordingly by the DB, subject to the "funding locking" arrangement referred to in [FAQ E14](#). The specifications for the in the nominee bank account and provide a confirmation to HKSCC (via FINI API ~~will be released by HKSCC or FINI interface~~).~~

Prior to the ballot, there will be no funds transferred to the issuer. Fund transfers to the issuer's receiving bank(s) will occur only after the release of the balloting results and IPO price determination (*Step 7*).

[HKSCC expects to publish the specifications of the EIPO Funding APIs in Q4 2021.](#)

## **E23. What should a DB do if a CP has insufficient funds to meet its PFR in *Step 3*? [\[Last Update: 30 November 2021\]](#)**

CPs are advised to communicate closely with their DBs ahead of, and during, the pre-funding confirmation. If sufficient funds are not available, a CP may in exceptional circumstances be permitted by HKSCC to amend and reconfirm its application list on FINI, so as to avoid the CP's entire application list being rejected because of a small or partial shortfall in its pre-funding position.

~~HKSCC is still studying the workflow for this contingency, but in principle the~~The DB will be expected to reject the first PFR message. There will then be ~~a withdrawal an~~ [operational](#) window for the CP to ~~amend adjust~~ its ~~public offer~~ application list (some time before "T-1" 17.30), so as to allow FINI to issue a revised PFR message to the CP's DB, and to receive the DB's confirmation before the 17.30 deadline.

## **E24. Why is EIPO money settlement migrating from EPI to RTGS CHATS in *Step 7*?**

During its review of the end-to-end IPO settlement process, HKEX saw the limitation of the batch / bulk clearing mechanism which is not particularly flexible or suitable for a shortened settlement timetable e.g. it cannot provide real-time funding positions. Based on feedback to the *FINI Concept Paper*, the adoption of RTGS CHATS is seen as an efficient alternative for EIPO funding settlement.

**E25. What will be the consequence of money settlement failure that may occur when the payment for CPs' allotted shares is due in *Step 7*?**

The design of the FINI pre-funding arrangement means that sufficient funds to cover all possible share allotment outcomes are "locked" by CPs' DBs ahead of the ballot. As such, HKEX considers an EIPO money settlement failure to be extremely unlikely.

In the event this extreme situation occurs, HKSCC will contact the 'defaulting' CP and its DB to determine the cause of the failure. HKSCC will consider:

~~i. issuing a new payment instruction for partial settlement if the value difference is minor;~~

ii. attempting the payment again in the next settlement window; or

iii. if it is determined that a particular CP's settlement obligation to the issuer cannot in fact be met (e.g. due to bank failure), HKSCC will notify the [Principal Designated Sponsor](#) and [PLBDOC](#) of a reallocation of the 'defaulted' CP's allotted public offer shares to the international offer tranche of the IPO.

All applications for shares under the terms of Hong Kong IPO prospectuses are irrevocable and legally binding, and the issuer has the right to seek remedy from the subscriber for any losses incurred as a result of failure to settle their allotted shares. As HKSCC is acting as a nominee on behalf of its CPs making applications for shares, each CP is responsible for fulfilling its settlement obligations, as required under the [GCASSHKSCC](#) Operating Procedures.

**E26. Can an issuer continue to use more than one receiving bank for its IPO?**

Yes. HKEX appreciates that (a) the introduction of the Paperless Listing & Subscription Regime, and (b) the public offer pre-funding reform under FINI may potentially reduce some of the motives that an IPO issuer may have to appoint multiple receiving banks. At the same time, we believe this is the IPO issuer's decision to make, and FINI will not prevent issuers from appointing more than one IPO receiving bank.



## F. Stock admission operations

### F1. Which existing forms, documents and agreements submitted to HKSCC for Stock Admission will be handled via FINI?

Form	Timing today	Changes under FINI	FINI submitter	FINI Deadline
Request for bank account information form	3 business days before the public offer open	Will be consolidated under the EIPO Agreement signed between the issuer and HKSCC	N/A	N/A
Direct Debit Authorisation and debtor reference generation form	1 business day before the public offer open	The FINI Key used to initiate the offering will also become the receiving bank's debtor reference.  A copy of the Direct Debit Authorisation should be uploaded in <i>Step 1</i>	Principal Designated Sponsor or Sponsor Counsel	T-5 14.00
Confirmation on placing arrangement through CCASS	1 business day before the public offer open	Will be submitted electronically via e-form in <i>Step 1</i>		
EIPO details confirmation form	1 business day before the public offer open			
Certified copy of Certificate of Incorporation/Business License, Certificate of Incorporation on Change of Name of the Company, Certificate of Registration/Change of name of Overseas Company, where applicable	1 business day before the public offer open	Will be uploaded in <i>Step 1</i>		
Certified copy of the duly adopted constitutional documents of the Company, including the Memorandum of Association (where appropriate) & Articles of Association, etc.	1 business day before the public offer open			
Certified board resolutions and supporting documents	1 business day before the public offer open			
Final listing timetable form	1 business day before the public offer open	Will be submitted electronically via e-form in <i>Step 1</i> . FINI will provide a suggested timetable, based on the inputted listing date.		
Undertaking by the Share Registrar	1 business day before the public offer allotment	Will be incorporated into the FINI Terms and Conditions for Share Registrars.	Share Registrar	On-boarding
Formal Stock Admission Letter	1 business day before start of trading	Auto-generated by HKSCC following regulatory clearance of places	N/A	N/A
Placement form/ Pre-deposit form	2 business days before deposit of placement shares into CCASS	Consolidated under a semi-automated online Placement/ Pre-deposit e-form	PLBDOC, IPO Sponsor(s), Sponsor Counsel or Issuer Counsel	T+2 09.00
Undertaking letter signed by issuer	2 business days before deposit of placement shares into CCASS			

Certified copy of Board Resolution approving allotment of placement securities through CCASS	2 business days before deposit of placement shares into CCASS			
Share Certificate Specimen	1 business day before start of trading			

**F2. How will international offer tranche money settlement work under FINI?**

The placing shares and funds settlement will largely remain unchanged. The syndicate may submit an online placement e-form via FINI, covering the depository arrangements of international offer shares into CCASS following the clearance of placee lists (*Step 9*). The Share Registrar will then be responsible for the delivery of the international offer shares to the CCASS Depository's service counter. After successful reconciliation, HKSCC will credit the applicable CCASS Stock Segregated Accounts based on the finalised Placement Form.

Syndicate members may then input (pre-)settlement instructions, and elect for free of payment, delivery versus payment or real-time delivery versus payment settlement at their discretion.

**F3. When will ISIN numbers for new Hong Kong listings be available?**

HKSCC will encourage IPO issuers and their Sponsors to have the ISIN number available before the opening of the public offer, and to input it into FINI during *Step 1* for market participants' easy reference.

**F4. How will FINI impact the current notifications provided to market participants by CCASS?**

FINI will fully replace the existing CCASS EIPO function. Existing CCASS reports, such as New Issues Reminders (EIPO) and New Issues Entitlement Report provided to CPs, will fully migrate to FINI in order to provide modernised, more real-time reporting with longer availability.

## Glossary of terms

<b>API</b>	Application Programming Interface
<b>BCAN</b>	Broker-to-Client Assigned Number
<b><a href="#">CMI</a></b>	<a href="#">Capital Market Intermediary</a>
<b>CCASS</b>	The Central Clearing and Settlement System operated by HKSCC
<b>CID</b>	Client Identification Data
<b>CIS</b>	Collective Investment Scheme
<b>CP</b>	CCASS Participant of HKSCC other than an Investor Participant (for the purposes of this document)
<b>CSD</b>	Central Securities Depository
<b>DB</b>	Designated EIPO Bank of CP
<b>D<sub>CP</sub></b>	A CP's total application value for public offer shares, submitted using the FINI system
<b><a href="#">DOC</a></b>	<a href="#">Designated Overall Coordinator</a>
<b>EIPO</b>	Electronic Initial Public Offering, a service offered by HKSCC for public offer share subscription
<b>EPI</b>	Electronic Payment Instruction
<b>ESS</b>	e-Submission System
<b>FCP or Concept Paper</b>	The FINI Concept Paper ("Modernising Hong Kong's IPO Settlement Process"), published by HKEX on 16 November 2020
<b>Federation of Share Registrars</b>	Federation of Share Registrars Limited, an organisation approved and governed by the SFC under Section 12 of the Securities and Futures (Stock Market Listing) Rules
<b>FINI</b>	<a href="#">Fast Interface for New Issuance</a> : the IPO settlement platform proposed in the FCP
<b>FINI Key</b>	Passcodes to be included in all Post-Hearing Letters that would allow the <a href="#">Principal Designated Sponsor</a> or Sponsor Counsel (if they are on-boarded to FINI) to initiate the offering for that IPO
<b>FINI Information Pack</b>	This document, whose most recent version is available on the FINI website
<b>FINI User Guide</b>	A user manual to be published by HKEX closer to the launch date of FINI
<b>FINI website</b>	<a href="https://www.hkex.com.hk/fini?sc_lang=en">https://www.hkex.com.hk/fini?sc_lang=en</a>
<b>GEM</b>	GEM of SEHK
<b><a href="#">HKAB</a></b>	<a href="#">The Hong Kong Association of Banks, an organisation incorporated under the Hong Kong Association of Banks Ordinance</a>
<b>HKD</b>	Hong Kong Dollar
<b>HKEX</b>	Hong Kong Exchanges and Clearing Limited
<b>HKEXnews</b>	A website operated by HKEX for the dissemination of information by issuers
<b>HKEX Client Connect</b>	A web-based services portal provided by HKEX
<b>HKICL</b>	Hong Kong Interbank Clearing Limited
<b>HKID</b>	Hong Kong Identity Card issued by the Immigration Department of the government of the Hong Kong Special Administrative Region
<b>HKIDR</b>	The investor identification regime proposed by the SFC on 4 December 2020, as defined in "Consultation on proposals to (1) implement an investor identification regime at trading level for the securities market in Hong Kong and (2) introduce an over-the-counter securities transactions reporting regime for shares listed on the Stock Exchange of Hong Kong."
<b>HKMA</b>	Hong Kong Monetary Authority
<b>HKSCC</b>	Hong Kong Securities Clearing Company Limited, a wholly-owned subsidiary of HKEX
<b>HKT</b>	Hong Kong Time
<b>ID</b>	Identification or identity
<b>IdP</b>	Identity provider
<b>international offer / placing</b>	The portion of a Hong Kong IPO that is initially offered to institutional and professional investors
<b>Investor Participant</b>	Investor Participant of HKSCC
<b><a href="#">IOSCO</a></b>	<a href="#">International Organization of Securities Commissions, an association of organisations that regulate various securities and futures markets</a>
<b>IPO</b>	Initial Public Offering
<b>JSON</b>	JavaScript Object Notation, a data-interchange format
<b>LC</b>	Licensed Corporation, a corporation (that is not an authorized financial institution) which is granted a licence to carry regulated activities under section 116 of the <a href="#">SFO Securities and Futures Ordinance</a>
<b>LEI</b>	Legal Entity Identifier
<b>Listing Division</b>	The Listing Division of SEHK
<b>Listing Rules</b>	The Main Board Listing Rules and GEM Listing Rules of SEHK, as the case may be

<b>Main Board</b>	Main Board of SEHK
<b><u>MMoU</u></b>	<a href="#">Multilateral Memorandum of Understanding Concerning Consultation and Cooperation and the Exchange of Information</a> , a document signed by IOSCO members to facilitate the sharing of information
<b>OAuth</b>	An open-standard authorisation protocol
<b><u>OC</u></b>	<a href="#">Overall Coordinator</a>
<b>PFR</b>	Pre-Funding Requirement of a CP in respect of its EIPO orders submitted to FINI
<b><u>PICS</u></b>	<a href="#">Personal information collection statement</a>
<b>PLB</b>	Principal Lead Broker <a href="#">(superseded by Designated Overall Coordinator)</a>
<b>PO<sub>MAX</sub></b>	The value of the IPO's entire public offer tranche, if the highest tier of clawback set out in an IPO issuer's prospectus was to be triggered
<b>PRC</b>	People's Republic of China
<b>public offer</b>	The portion of a Hong Kong IPO that is initially offered to members of the Hong Kong public
<b>REITs</b>	Real Estate Investment Trusts
<b>Reverse Takeovers</b>	As defined under Main Board Listing Rule 14.06B (or GEM Listing Rule 19.06B)
<b>RI</b>	Registered Institution, an authorized financial institution which is registered with the SFC under section 119 of the Securities and Futures Ordinance
<b>RTGS CHATS</b>	Clearing House Automated Transfer System, an interbank payment system operated by HKICL
<b>SEHK / Exchange</b>	The Stock Exchange of Hong Kong Limited, a wholly-owned subsidiary of HKEX
<b>SFC</b>	Securities and Futures Commission
<b>Terms and Conditions</b>	Terms and conditions that will govern the use of the FINI platform by market participants
<b>USM</b>	The initiative for implementing an uncertificated securities market in Hong Kong, as defined in the "Joint Consultation Paper on a Revised Operational Model for Implementing an Uncertificated Securities Market in Hong Kong."

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