

Compliance Reminder on Risk Management

(Applicable to Clearing Participants¹ only)

Risk management is one of the key responsibilities of Clearing Participants (“CPs”) of HKSCC, HKCC and SEOCH (collectively, the “Clearing Houses”), as set out under the admission materials and relevant rules and procedures of the Clearing Houses.

CPs should set up robust risk management frameworks and controls, so as to ensure the proper assessment, monitoring and mitigation of key risks (including but not limited to, credit risk, liquidity risk, operational risk, market risk and capital) at all times.

In the 2018 Annual Attestation and Inspection Programme, control weaknesses were found in the following risk management areas:-

1. Stress Testing

- ***Absence of proper stress testing for its own or clients’ exposure on HKEX’s products, particularly on non-linear products such as options.***

Stress testing of non-linear products (e.g. options) is crucial to CPs since the losses of non-linear products increase exponentially under extreme scenarios. CPs with significant activities in non-linear products are expected to implement and conduct stress testing regularly and at least on a weekly basis, to evaluate the potential loss of its portfolio under extreme but plausible market conditions. Proper stress testing policies and procedures should also be established to clearly set out the stress testing methodology, frequency and the review and escalation mechanism.

Further information on stress testing can be found in the [Annex](#).

2. Credit Exposure Management - Monitoring of Position Limit and Late Payment Management

- ***Lack of sufficient and effective monitoring and control on credit exposures***

Client limits (e.g. position limit, credit limit and/or trading limit) are imposed by CPs on their clients for controlling their credit exposure. It was noted that while CPs had set up limits for their clients, had not implemented any system to monitor their clients’ positions against limits assigned to such clients and/or had allowed clients to transact based on their clients’ available funds instead. Policies and procedures in relation to the treatment of outstanding loan payments were also found to be inadequate where follow-up, escalation and provisioning / write-off of such loans were not clearly set out.

¹ (i) Clearing Participants and General Clearing Participants of HKFE Clearing Corporation Limited, and (ii) Direct Clearing Participants and General Clearing Participants of Hong Kong Securities Clearing Company Limited and The SEHK Options Clearing House Limited

CPs are reminded to implement appropriate and adequate monitoring arrangements in this regard, including but not limited to inputting the limits assigned to clients into the system for continuous monitoring. Failure to implement appropriate and adequate monitoring arrangements may result in regulatory breaches, which could be grounds for disciplinary actions.

3. Notification of Change in Operations and Risk Control Plan

- ***Failure to notify the Clearing Houses when there is a change in operations and risk control, including but not limited to changes arising from engaging in new business activities***

According to the admission material (Note 2 of Attachment 2 of the “[Explanatory Notes for applications for Participanship and Trading Right](#)”) and the responsibilities set out under CCASS Rule 1703(iii), HKCC Rule 214(n) or SEOCH Rule 403(17), CPs are required to notify the Clearing Houses of any change in the details supplied to the respective Clearing Houses at the time of admission and thereafter including, among other things, updated risk and control documents when engaging in new business activities such as proprietary trading and margin financing.

4. Controls on Managing Defective Securities Risk associated with Deposit of Physical Certificates

- ***Absence of proper control measures that can effectively limit the risks or losses arising from defective securities***

CPs are responsible for defective securities they deposited into the CCASS Depository and their responsibilities are set out under Section 7.2.2 of CCASS Operational Procedures. Proper measures should be implemented on managing defective securities risk, which may include the following:

- (i) procedures in place to put on hold the shares from utilization (e.g. for settlement of short positions) until re-registration into the name of HKSCC Nominees Limited is completed (i.e. when the share registrar has confirmed the validity and good title of the participant’s physical certificates);
- (ii) withhold the sales proceeds from its selling clients until completion of re-registration of the physical certificates; or
- (iii) other measure(s) to manage the risk involved in utilizing shares with immediate credit given before physical certificates are confirmed to be good and valid.

5. Control, Monitoring and Staff Training in relation to the Fulfillment of Settlement Obligations

- ***Inadequate monitoring and controls over Settlement Operations for ensuring the timely completion of steps essential to fulfill the settlement obligation of the Clearing Houses***

CPs should put in place adequate and comprehensive internal controls and procedures governing the settlement process; and all relevant officers should strictly follow the prescribed timeline to facilitate smooth operation, especially for backup or holiday covers. Examples of effective tools for settlement controls include: a checklist with maker-checker signoff over key settlement steps (with timelines clearly set out for each step); or a system dashboard to monitor the timeliness in completing each key settlement steps with automatic escalation/alerts.

CPs are advised that the review of funding sufficiency at market close should be based on the actual position data or settlement reports disseminated by the Clearing Houses. By relying on internal position data (instead of Clearing Houses' data / report) during the funding forecast/arrangement process, CPs may fail to capture errors caused by internal system or manual process e.g. incorrect/incomplete positions net-down in HKCC / SEOCH. This would lead to an incorrect forecast of the settlement amount and may result in payment failure.

CPs should keep abreast of circulars issued by the Clearing Houses and conduct regular reviews on their operation procedures to ensure compliance with the relevant rules and requirements at all times. Among other things, CPs should ensure that their settlement arrangements (including arrangements during holiday periods) comply with the latest requirements stipulated by the Clearing Houses.

CPs should ensure that their staff has adequate and up-to-date knowledge on operational risk and control, payment obligations and the consequences of failure in meeting the obligations of the Clearing Houses. CPs should arrange for their staff to attend training courses, such as the one mentioned in the circular "[Training course jointly organized by HKEX and HKSI Institute](#)" issued by the Clearing Houses on 31 December 2018 (Ref. No. CD/CDCRM/243/2018) and make reference to circulars such as "[Reminder on Payment Obligations of Clearing Participants](#)" issued by the Clearing Houses on 26 January 2018 (Ref. No. [CD/CDCRM/021/2018](#), [CD/CDCRM/022/2018](#) and [CD/CDCRM/023/2018](#)) to enhance the staff's awareness on payment obligations of the Clearing Houses.

6. Risk Governance and Operational Capability

- ***Inadequate control in relation to risk management governance***

A proper risk governance framework usually involves establishment of a risk management committee for exercising senior management oversight over key risk areas. In some instances, CPs did not keep proper meeting records/reports to show that a committee meeting has been conducted or the focus items discussed by senior management at the meeting.

CPs should establish a proper risk governance framework (e.g. by setting up a risk management committee with regular meetings) and maintain documentation to demonstrate senior management's oversight of issues and to keep track of their discussion and monitoring over key risk areas, in particular, on the treatment of credit risk, concentration risk and monitoring of sufficiency of liquid capital.

7. Business Continuity Plan

- ***Inadequate arrangement in place to ensure its fulfillment of the Clearing Houses' settlement obligations under contingent situation***

To cope with disruptions that may impair CPs' ability to meet settlement obligations with the Clearing Houses, CPs should develop and maintain a business continuity plan, which should clearly set out the actions that the firm would take during contingent scenarios.



STRESS TESTING ON OPTIONS

HKEX
香港交易所

Clearing Risk Management

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AGENDA

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Background

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Linear Products vs Non-Linear Products

3

Stress Testing Calculation



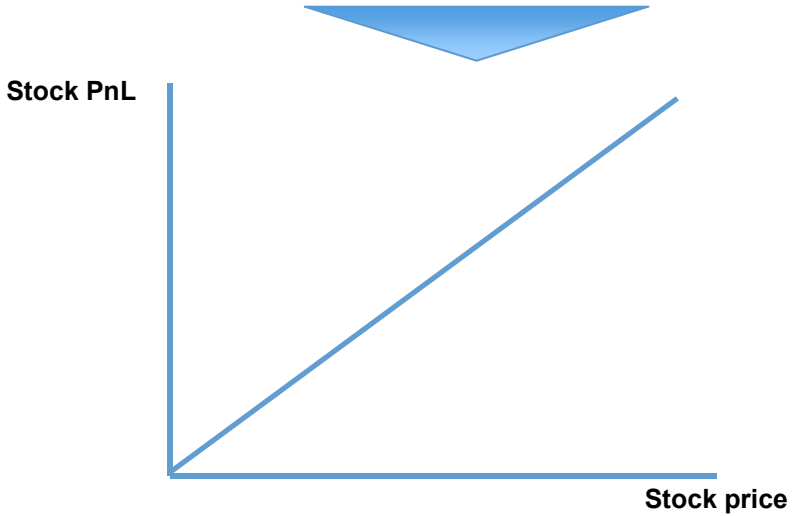
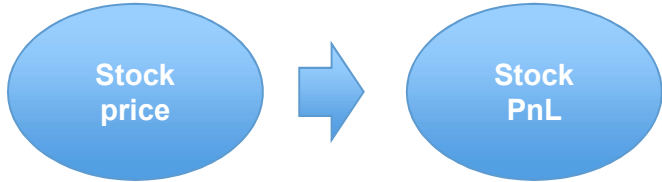
Overview

- Stress testing is the analysis / simulation technique widely used by institutions to evaluate the potential portfolio loss under extreme but plausible market condition.
- Most financial institutions use stress testing as a daily risk management tool e.g. set operational limits, allocate resources to ensure liquidity and capital adequacy for the aforesaid loss.
- Stress testing of non-linear products is crucial to Clearing Participants (CPs) as it tells CPs how the loss of non-linear products increases exponentially under extreme scenarios.
- CPs are strongly recommended to have proper stress testing in place for it's own or clients' exposure on HKEX's products, particularly on non-linear products such as option.

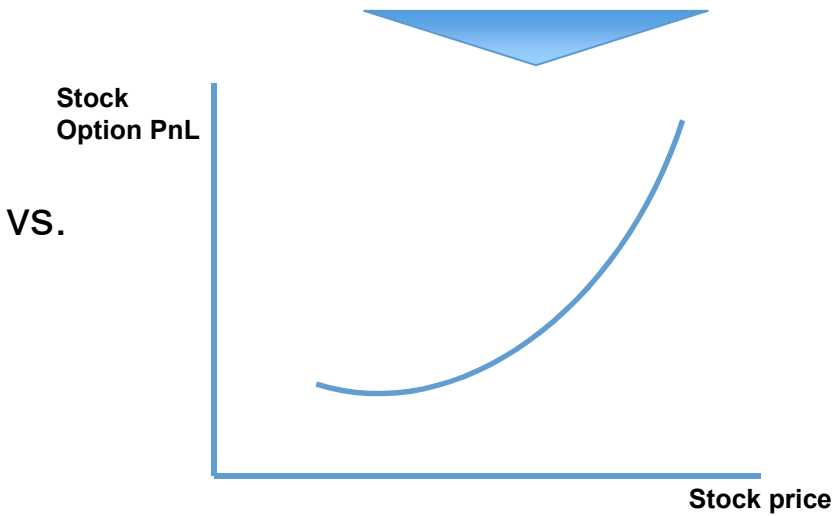
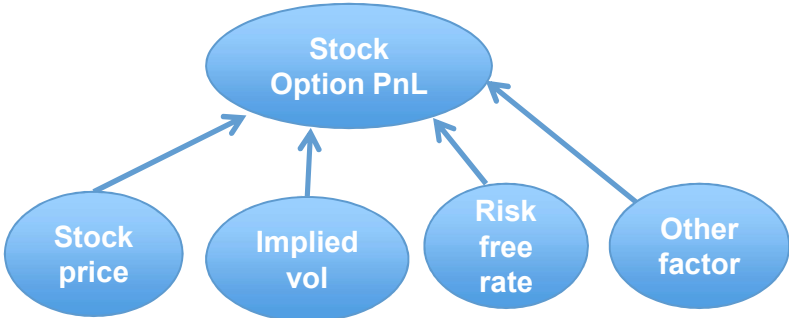


Linear vs. Non-Linear Products

Linear



Non-Linear



• *The change in risk exposure of option is exponential and subject to multiple risk factors, which is different from stock.*



Stress Testing Calculation - SEOCH

Example 1: Bullish view on China Life (2628) on 25 Oct 2018

- Short 1 China Life Oct18 put option at HK\$15.5 strike price (x1000 shares)
- China Life closed at HK\$ 17.1
- Margin Requirement is HK\$ 316

| Profit and Loss in HK\$ | | |
|---------------------------------|--|-----------------------------|
| Stock price movement assumption | Short 1 put options at HK\$15.5 strike price | Margin deficit per contract |
| -9% | HK\$ -320 | HK\$ -4 |
| -15% | HK\$ -1,010 | HK\$ -694 |
| -22% | HK\$ -2,140 | HK\$ -1,824 |

- Additional loss incurred during the positions close-out (3%* or more in normal condition, see below)
- Bid-ask spread will further widen in the stress condition

| Bid Orders | | | | Ask Orders | | | |
|------------|------|------|------|------------|------|------|--|
| Type | BQty | Bid | Ask | AQty | Type | | |
| LMT | 50 | 0.55 | 0.58 | 106 | LMT | HKGS | |
| LMT | 200 | 0.55 | 0.58 | 200 | LMT | HKOF | |
| LMT | 200 | 0.55 | 0.59 | 50 | LMT | HKIM | |
| LMT | 115 | 0.54 | 0.59 | 101 | LMT | HKCT | |
| LMT | 1 | 0.53 | 0.59 | 40 | LMT | HKYK | |
| LMT | 30 | 0.53 | 0.60 | 200 | LMT | HKNH | |
| LMT | 68 | 0.53 | 0.60 | 30 | LMT | HKBN | |
| LMT | 25 | 0.51 | 0.60 | 68 | LMT | HKIB | |
| LMT | 25 | 0.41 | | | | | |

- **Stress loss of short option is massively understated if treated like stock in stress calculation (Leverage effect)**



* $[(0.58-0.55)/2]/0.55=3\%$

Stress Testing Calculation - HKCC

Example 2: Bullish view on Hang Seng Index

- Short 1 Hang Seng Index Mar19 put option at 26,400 strike price
- Hang Seng Index closed at 26,227.7
- Margin Requirement is HK\$ 132,210

| Profit and Loss in HK\$ | | |
|---------------------------------|--|-----------------------------|
| Stock price movement assumption | Short 1 put options at 26,400 strike price | Margin deficit per contract |
| -5% | HK\$ -37,350 | HK\$ 0 |
| -10% | HK\$ -84,800 | HK\$ 0 |
| -20% | HK\$ -201,800 | HK\$ -69,590 |

- Additional loss incurred during the positions close-out (0.7%* or more in normal condition, see below)
- Bid-ask spread will further widen in the stress condition

| Bid Orders | | | | Ask Orders | | | |
|------------|------|-----|-----|------------|------|-------|--|
| Type | BQty | Bid | Ask | AQty | Type | | |
| LMT | 8 | 735 | 745 | 8 | LMT | HKOPT | |
| LMT | 7 | 732 | 745 | 7 | LMT | HKNH1 | |
| LMT | 5 | 732 | 751 | 7 | LMT | HKYKI | |
| LMT | 7 | 731 | 759 | 7 | LMT | HKMPH | |
| LMT | 7 | 729 | 763 | 5 | LMT | HKLQI | |
| LMT | 5 | 723 | 773 | 5 | LMT | HKJPI | |
| LMT | 5 | 720 | 774 | 5 | LMT | HKMIV | |
| LMT | 5 | 704 | 775 | 5 | LMT | HKSG: | |
| LMT | 5 | 703 | 780 | 5 | LMT | HKSG: | |
| | | | 792 | 5 | LMT | HKIBG | |

- **Stress loss of short option is massively understated if treated like stock in stress calculation (Leverage effect)**



* $[(745-735)/2]/735=0.7\%$