

# Investor Identification Regime at Trading Level for the Securities Market in Hong Kong (HKIDR)

## Frequently Asked Questions on Broker-to-Client Assigned Number (BCAN) Submission and Order Tagging Related Topics

(Version Date: 17 March 2023)

*These FAQs are published by The Stock Exchange of Hong Kong Limited (Exchange or SEHK) for the purpose of addressing some frequently asked questions from market participants relating to the investor identification regime at trading level for the securities market in Hong Kong (Hong Kong Investor Identification Regime or HKIDR). These FAQs should be read in conjunction with the Rules of the Exchange, the Code of Conduct for Persons Licensed by or Registered with the Securities and Futures Commission (Code of Conduct), and the Frequently Asked Questions on HKIDR published by the Securities and Futures Commission (SFC). If there are any conflicts between these FAQs, the Code of Conduct, the SFC FAQs and any other guidance published by the SFC relating to the HKIDR (SFC Guidance), the requirements as described in the Code of Conduct and the SFC Guidance shall prevail.*

### **A. Submission of BCAN-CID Mapping File via ECP**

#### **1. When should a Relevant Regulated Intermediaries (RRI) <sup>1</sup> submit the Client Identification Data (CID)? (26 November 2021)**

A RRI which assigns the BCAN<sup>2</sup> to the Relevant Client<sup>3</sup> should also be the RRI which collects the CID from that client. After collection of the CID, the RRI should put the CID and BCAN information of the client into a file, namely “BCAN-CID Mapping File”, and submit to SEHK via the Electronic Communication Platform (ECP) before the prescribed cut-off time of 4:30pm on the day before the trading day (T-1 day).

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<sup>1</sup> A Relevant Regulated Intermediary, under the HKIDR, refers to a licensed corporation or a registered institution which (i) submits (or arranges to submit) for execution an on-exchange order; (ii) carries out an off-exchange order; or (iii) reports an off-exchange trade directly as an exchange participant to SEHK according to its rules, in connection with: (i) carrying out proprietary trading; or (ii) providing securities brokerage services for another person in respect of orders placed through an account opened and maintained for that person.

<sup>2</sup> BCAN refers to a “Broker-to-Client Assigned Number”, being a unique identification code in the format prescribed by SEHK, generated by a Relevant Regulated Intermediary in accordance with SEHK’s requirements.

<sup>3</sup> Relevant Client refers to a party which has placed or proposes to place a securities order through a securities trading account with a Relevant Regulated Intermediary. Where the order is a proprietary trade, the Relevant Client would refer to a Relevant Regulated Intermediary placing the order for itself. Where an order is routed through an intermediating chain of brokers, a Relevant Client would be the first person in the chain who is not a Relevant Regulated Intermediary.

**2. Under what circumstances is the BCAN-CID Mapping File not required to be submitted on or before T-1 day? (26 November 2021)**

For new clients to trade on the day of account opening or clients whose accounts have remained dormant<sup>4</sup> to trade on the day when their dormant accounts become re-activated (i.e. the day of entering into a trade), their BCAN-CID Mapping files are allowed to be submitted either before or after the order is submitted, but in any event by 4:30pm on a trading day (T day).

**3. What are the submission channels of the BCAN-CID Mapping File for a RRI? (Updated on 3 August 2022)**

1. RRI which are EPs can submit the BCAN-CID Mapping File to SEHK via ECP (secure file transfer protocol, SFTP) or through ECP Web Interface by using SEHK assigned login identity (ID) and password, or the ID and password for the SFC's WINGS (Web Integrated Service) platform.
2. Non-EP RRI can submit the BCAN-CID Mapping File to SEHK via ECP (SFTP) or through ECP Web Interface by using the ID and password for the SFC's WINGS platform. In case non-EP RRI prefer to submit BCAN-CID Mapping Files via ECP (SFTP), they are required to install SDNet/2 circuits.
3. The BCAN-CID Mapping File can also be submitted by a third party (i.e. On Behalf of (OBO) submission) via the ECP (SFTP) or ECP Web Interface. The submitter must be authorized and/or delegated by the relevant EPs/non-EP RRI.

Please refer to the [HKIDR File Transfer Connectivity Guide](#) for details.

**4. What happens if a client opens an account on T day and trade on the same day, and the BCAN-CID Mapping File is submitted at 4:15pm but a BCAN record has formatting error, and the revised BCAN Mapping File cannot be resubmitted again by 4:30pm? (26 November 2021)**

Such BCAN record will not be recorded by SEHK and will not be shown in the BCAN Full Image File. Without prejudice to any regulatory actions that may be taken against the relevant RRI for potential non-compliance with the relevant requirements, it should submit the correct BCAN Mapping File again on next day as soon as possible.

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<sup>4</sup> Dormant accounts refer to those which have been inactive for 24 months since last trade (irrespective of account balance or movement).

**5. How frequent should a RRI submit a BCAN-CID Mapping File? (26 November 2021)**

RRI is required to submit the mapping file whenever there are any changes to the BCAN-CID mapping data. For the avoidance of doubt, a full list of mappings of all Relevant Clients' BCANs and CID is always required to be submitted even if only part of those mappings have been changed (e.g. only a few clients have updated their CID or have opened new accounts or have closed existing accounts).

**6. What happens if a RRI does not submit the BCAN-CID Mapping File to SEHK during the submission hour? (26 November 2021)**

The mapping records that SEHK previously accepted will remain effective. No BCAN-CID Response File will be given.

**7. What is the arrangement for submission of BCAN-CID Mapping Files on T-1 day under severe weather conditions? (Updated on 3 August 2022)**

The ECP Web Interface and ECP (SFTP) Interface will be opened for BCAN-CID Mapping File submission from 7:00am to 4:30pm on each trading day for the Hong Kong securities market, even under severe weather conditions. For the avoidance of doubt, the file processing behavior (e.g. the return of BCAN-CID Response File / Process Result File / Full Image File) in such case will be the same as normal trading days.

**8. Is the SFTP facility for Northbound trading under Stock Connect the same as the ECP (SFTP) Interface for HKIDR? (Updated on 3 Aug 2022)**

Under HKIDR, a new and different SFTP facility is used, which must be initiated from an EP's or non-EP RRI's registered Internet Protocol (IP address).

**9. After submitting the BCAN-CID Mapping File, when will a RRI receive various BCAN-CID interface files? ( Updated on 3 August 2022)**

The available time of various BCAN-CID interface files are summarized as follows:

No	Time	Party	Activity
1	7:00am - 4:30pm	Exchange Participant (EP)/non-EP RRI	a) Submission of BCAN-CID Mapping File (HBCNMAPP).
		HKEX	b) Distribution of BCAN-CID Response File (HBCNMPPR). (normally within 10 minutes after submitting BCAN-CID Mapping

			File)
2	6:00pm -11:59pm	HKEX	a) Distribution of BCAN Process Result File (HBCNRSLT). (after 6:00pm on Hong Kong Securities Market trading days)
			b) Distribution of BCAN Full Image File as recorded in HKEX (HBCNFIMG). (after 6:00pm on Hong Kong Securities Market trading days)
3	12:00am on the next calendar day	HKEX	a) System cleanup – all files will be removed from ECP.

**10. Is multiple accounts allowed for each business lines of the same RRI in ECP? (Updated on 3 August 2022)**

As mentioned in the [Information Paper](#) (paragraph 23(v)), the ECP will not provide different accounts for different divisions within a RRI to submit multiple BCAN-CID Mapping Files. For the avoidance of doubt, the login credential follows the current settings at ECP / the SFC's WINGS and no additional accounts will be provided. In such case, the RRI should arrange to consolidate BCAN and CID mapping data received from the different divisions into a single BCAN-CID Mapping File before submission.

It should also be noted that if multiple BCAN-CID Mapping Files are submitted within a day, the last one processed by SEHK before the prescribed cutoff time will be taken as the final record and will overwrite the preceding ones.

## **B. Preparation of BCAN-CID Mapping File**

- 1. If a Relevant Client of a RRI is a trust, who's CID should be collected? And in case the trustee of the trust concerned is (i) an individual trustee or (ii) a group of individual trustees or (iii) a corporate trustee, which "Client Type" should be input in the BCAN-CID Mapping File? (Updated on 3 August 2022)**

If a Relevant Client of a RRI is a trust, the CID of the trustee(s) should be collected. However, in the case of a trust which is an investment fund, whether CID of the asset management company or the individual fund should be obtained depends on which entity is the account holder of the securities trading account through which an order is placed.

In case the trustee of the trust is an individual trustee, the "Client Type" value of "1" (same as that for an individual) should be used. In case the trustee consists of a group of individual trustees, the "Client Type" value of "2" (same as that for a Joint Account) should be used. In case the trustee of the trust is a corporate trustee, the "Client Type" value of "6" (representing "Legal entity – Others") should be used.

- 2. Can the "Client Type" value be changed in the BCAN-CID Mapping File once registered? If so, how to change it? (26 November 2021)**

Under the HKIDR, "Client Type" value is allowed to be updated if necessary. A RRI can update it in the BCAN-CID Mapping File and submit the file to SEHK.

- 3. What should a RRI do if it ceases trading? (26 November 2021)**

If an EP/non-EP RRI ceases trading, they should submit an "empty" mapping file with no BCAN and CID data (i.e. mapping file with header and control records only). The system will then mark the BCAN-CID mapping records that were submitted previously as "Inactive".

- 4. Can I provide the first 4 characters of the identity document number in the BCAN-CID Mapping File only? (26 November 2021)**

Exact identity document number should be provided - including characters, numbers, and symbols like brackets. For example, if the identity document number on the official document is "A123456(7)", then "A123456(7)"(including brackets) should be provided in the BCAN-CID Mapping File.

**5. Can an entity consolidate all of the BCAN and CID information of its affiliates and submit one BCAN-CID Mapping File to SEHK? (Updated on 3 August 2022)**

No, a RRI should only submit the BCAN-CID mappings of its Relevant Clients (i.e. a BCAN-CID Mapping File should not contain BCAN-CID mappings of Relevant Clients of another RRI).

However, BCAN-CID Mapping File can also be submitted by a third party (i.e. On Behalf of (OBO) submission) who is authorized and/or delegated by the relevant EPs/non-EP RRIs through the ID and password assigned for the SFC's WINGS platform.

**6. If I am uploading on behalf of my affiliate as well (authorization and delegation obtained), should I upload two different sets of BCAN-CID Mapping Files to SEHK or combine BCAN and CID mapping of all customers of our affiliates to a single file before uploading? (28 January 2022)**

In such case two different BCAN-CID Mapping Files should be submitted, i.e. one BCAN-CID Mapping File for each RRI. Each BCAN-CID Mapping File should not contain BCAN-CID mappings of Relevant Clients of another RRI.

**7. Is it acceptable to use the BCAN assigned for the Northbound (NB) Investor ID regime for the HKIDR? And if yes, how can I reuse it? (28 January 2022)**

The HKIDR and the NB Investor ID Regime which was launched on 26 September 2018 under Stock Connect are expected to work independently.

For those EPs who are registered as China Connect Exchange Participants or EPs trading through a China Connect Exchange Participant, they may assign the same or different BCAN (i.e. the randomly assigned number not exceeding 10 digits) to a client under both regimes. If a RRI wish to reuse the NB BCAN for the HKIDR, please add the SFC's CE number of the RRI assigning the BCAN, followed by a dot in front of the NB BCAN, i.e. if the NB BCAN is 1234567890, the BCAN under HKIDR will be ABC123.1234567890 (where ABC123 is the SFC's CE number of the RRI).

**8. Must the client's name in the BCAN-CID Mapping File be the same as in the official identity document? (28 January 2022)**

The Chinese and English names in the BCAN-CID mapping data submitted must be exactly the same as in the official identity document. For example, if the name in the official identity document is in Simplified Chinese, then the name in the BCAN-CID mapping data must also be in Simplified Chinese. In case the name in the national identification

document is not in Chinese or English, the guidance issued by the SFC as contained in the relevant FAQ should be referred to.

**9. Are there any templates provided for the BCAN-CID Mapping File and the five reporting forms<sup>5</sup>? (3 August 2022)**

Please refer to [File Interface Specification](#) Section 2.4 for detailed specifications of the BCAN-CID Mapping File.

While a template will not be provided for the BCAN-CID Mapping File, the templates of the five reporting forms are provided on the [HKIDR web corner](#). Please refer to Section 3 of the File Interface Specification for detailed specifications of the five reporting forms.

**10. Can a corporate client of a RRI be assigned with more than one “client types” in the BCAN-CID Mapping File (e.g. the corporate client has setup more than one accounts at the RRI for different business activities)? (3 August 2022)**

In a case where a corporate client has two or more accounts opened with a RRI, the RRI may choose to assign a single BCAN to that corporate clients or to assign multiple BCANs to that client to distinguish between orders placed through different accounts. In case multiple BCANs are assigned to a client, different client types can be assigned to each of these BCANs based on the business activities engaged by the client for a certain account. In case a single BCAN is assigned to the client, only one client type can be assigned to the BCAN of the corporate client.

However, it should be noted that the client type “5 – Proprietary Trading” should only be used by a RRI for its own (and not its clients’ nor affiliates’) proprietary trading account.

**11. If a corporate client of a RRI has an account with that RRI for proprietary trading purposes, what “client type” should be assigned for this client in the BCAN-CID Mapping File? (3 August 2022)**

The client type for proprietary trading of a RRI’s client should be “6 – Legal entity – Others”. It should also be noted that the client type “5 – Proprietary Trading” should only be used by a RRI for its own (and not its clients’ nor affiliates’) proprietary trading account.

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<sup>5</sup> Reporting forms refer to the Aggregated Transaction Report, BCAN Change Report, BCAN Change for LP Quote Report, BCAN Error Report and Off-Exchange Trade BCAN (Buy-side) Report.

## C. Preparation and submission of reporting forms

### 1. There are a number of reporting forms under HKIDR, what are the responsible parties to submit each reporting form? (Updated on 17 March 2023)

Please see below for the corresponding parties to submit each type of reporting forms.

Reporting Forms	Purpose	ECP Submission	Party to submit	Validation by HKEX	
Aggregated Transaction Report	For reporting the underlying allocation and BCANs of matched aggregated orders and aggregated off-exchange trades	via (1) web interface, (2) web interface through the SFC's WINGS or (3) SFTP	RRIs (EPs or non-EPs) who aggregate the order should submit or arrange to submit	Response File for format validation will be returned shortly after submission	Report Result File will be returned by <b>8:00 am on next calendar day</b> under normal circumstances
BCAN Change Report	For reporting the re-assignment of BCAN (i.e. changing the assigned BCAN of a Relevant Client to another unassigned BCAN in exceptional cases)	via (1) web interface, (2) web interface through the SFC's WINGS or (3) SFTP	RRIs who submit the BCAN-CID mapping file		
BCAN Error Report	For lodging correction of BCANs of matched orders and off-exchange trades	via (1) web interface or (2) SFTP	EPs who input the relevant order / off-exchange trade in OTP-C		
Off-exchange Trade BCAN (Buy-side) Report	For reporting the buy-side BCAN of an off-exchange trade if such BCAN is not tagged to the off-exchange trade before day-end market close	via (1) web interface or (2) SFTP	Buying EPs of the off-exchange trade (i.e. manual trade) who fail to input the buy-side BCAN in OTP-C		
BCAN Change for LP Quote Report	For providing the reason of changing the BCAN tagged to a Liquidity Provider (LP) quote	via (1) web interface or (2) SFTP	EP (who is a LP) who changes the BCAN of LP quote		

Please refer to the [HKIDR File Transfer Connectivity Guide](#) for details.

### 2. How to report tagging error relating to CE number on a transaction? (28 January 2022)

EPs can report tagging error relating to CE number by submission of a BCAN Error Report.



- 3. If an off-exchange trade on a non-CAS security is concluded around 15:55, and the selling EP input the off-exchange trade at 15:59, while the buying EP is only alerted of the trade after 16:00, what should the buying EP do? (28 January 2022)**

As mentioned in the [Information Paper](#) (paragraph 30), in case the buying EP fails to insert the BCAN before market close, the buying EP needs to submit the Off-exchange Trade BCAN (Buy-side) Report to SEHK via the ECP to list out all off-exchange trades without buy-side BCANs tagged and to provide the relevant BCANs for each of the off-exchange trades.

- 4. In the case of off-exchange trade, since there is a 30-minute window for the purchasing side to submit the BCAN. Will the exchange accept the message after market close but within the 30 minutes? (28 January 2022)**

A buying EP cannot input the buy-side BCAN after the market close. In case a buying EP fails to input buy-side BCAN before the market close, the relevant buying EP is required to submit an Off-Exchange Trade BCAN (Buy-side) Report to SEHK via ECP to report back the buy-side BCAN.

- 5. What are the 2 levels of validation mentioned in the File Interface Specification (i.e. 1<sup>st</sup> & 2<sup>nd</sup> level validations respectively) for the five reporting forms mentioned in Question C-1? (Updated on 3 August 2022)**

The 2 levels of validation mentioned in the File Interface Specification are:

1<sup>st</sup> level validation: The validation checks against the filename format and performing of virus scan. An acknowledgment or rejection file will be returned for a file being accepted or rejected respectively, please refer to the [File Interface Specification](#) Appendix I for details.

2<sup>nd</sup> level validation: Once the file is accepted by the 1st level validation, further validation will be conducted to check against the basic file format. A response file will be returned as per described in [File Interface Specification](#) Appendix III C1.

Records passing the 2nd level validation in the last submitted reporting form before the cut-off time will be further processed by HKEX's system. Passed and failed records after further processing will be returned in a Result File on the next day as further described in [File Interface Specification](#) Appendix III C2.

6. According to the [Information Paper](#), a BCAN that is assigned to a client can be amended to another unassigned BCAN in exception cases (e.g. due to system upgrade). In such case should a RRI submit the BCAN Change Report before or after the BCAN re-assignment become effective? (28 January 2022)

In such case, a new BCAN that is updated in a BCAN-CID Mapping File and submitted to SEHK on T-1 day will become effective on T day. The RRI should ensure the new BCAN is used and tagged on orders submitted on T day. The RRI should also submit the BCAN Change Report on the day after the effective date of the BCAN re-assignment (i.e. submit the report on T+1 day) to notify SEHK with reasons of the BCAN re-assignment.

7. In the case of a trade where the trade quantity is erroneous, should the RRI submit a BCAN Error Report if some of transacted shares are “re-allocated” to the RRI’s house account for error handling? (17 March 2023)

Please note that BCAN Error Report is for an executed order where an incorrect BCAN was tagged to the relevant order *at the time the order was placed*. For trade errors that are not related to BCAN tagging error (e.g. incorrect traded quantity), they should be reported per existing arrangement via submission of Reporting of Trading Discrepancy/Error Form.

#### **D. Tagging of BCAN and OTP-C validations**

##### **1. What should a RRI do if an incorrect BCAN is tagged to an order? (26 November 2021)**

If such an order has not been executed yet, the RRI (except for Liquidity Providers (LPs)) should cancel and re-input the order with the correct BCAN as soon as possible. In this case the order will need to re-queue in the order queue and the order's original priority will be lost.

If the order has already been executed, the EP executing the order should submit a BCAN Error Report with correct BCAN information to SEHK via the ECP by 6pm on a trading day.

For LPs, they may use the "quote update" function to update the BCAN in their quotes (as currently the case for updating other quote details). The LPs which have updated the BCAN should submit a BCAN Change for LP Quote Report to SEHK via the ECP by 6pm on a trading day.

##### **2. Under HKIDR and with regards to BCAN tagging, under what circumstances will an order be rejected by the OTP-C trading system? (26 November 2021)**

SEHK will conduct real-time validation checks of whether a BCAN has been inputted with an order and whether the BCAN is inserted in the correct format. Where the prefix Central Entity Number (CE number) and/ or BCAN is not provided or they are in an invalid format, the relevant order being inputted into the OTP-C will be rejected. In contrast, on-exchange order or off-exchange trade tagged with non-recorded BCAN (i.e. a BCAN not contained in a submitted BCAN-CID Mapping File) will not be rejected by OTP-C. However, the RRI may be subject to follow-up enquiries and/or further actions from SEHK and the SFC for potential non-compliance with the relevant requirements.

##### **3. Will SEHK's trading system reject an order tagged with a BCAN which is not contained in a submitted BCAN-CID Mapping File (i.e. non-recorded BCAN)? (26 November 2021)**

SEHK's trading system (OTP-C) will conduct real time validation checks of (1) whether a BCAN has been inputted with an order and (2) whether the BCAN is inserted in the correct format but OTP-C will not reject orders tagged with non-recorded BCAN. However, the RRI may be subject to follow-up enquiries and/or further actions from SEHK and the SFC for potential non-compliance with the relevant requirements.

- 4. If no consent is obtained from individual Relevant Clients for the transfer of their personal data to the SEHK and/or the SFC under the HKIDR, can a RRI still conduct trading for its individual Relevant Clients? (Updated on 3 August 2022)**

Unless the relevant consent as prescribed by the [Consent Circular](#) issued by the SFC on 13 September 2021 from the individual (i.e. natural person) Relevant Clients is obtained, RRIs shall place sell orders only (and should tag the specific sell-only BCAN value of “1” to such orders) for those clients.

- 5. If a client has an existing BCAN (already submitted to SEHK before) but we would like to change its ID type and ID number, can we keep using the existing BCAN for trading? Do we need to generate a new BCAN for submission? (28 January 2022)**

In such case, the RRI should update the ID type and ID number in the BCAN-CID Mapping File without changing the BCAN, and submit the updated file to SEHK as soon as practicable after validating the updated CID.

- 6. Can I use the reserved BCAN value “1” in case the sell-only transaction is an off-exchange trade? (28 January 2022)**

BCAN value “1” is also applicable to off-exchange trade (i.e. manual trade).

- 7. For an off-exchange trade that is a direct business transaction (i.e. the same EP acting for both the buyer and the seller), is the EP required to submit two ‘New Off Exchange Trade (21)’ messages, one for the sale and one for the purchase? (3 August 2022)**

For an off-exchange trade (i.e. manual trade) that is a direct business transaction, the input procedure is same as today but the EP is required to tag both the sell-side and buy-side BCANs to the message in one go when inputting the direct business transaction.

- 8. For an off-exchange trade, can the buying EP insert the BCAN during lunch hour (i.e. from 12:00 to 13:00)? (3 August 2022)**

The buying EP cannot insert the buy side BCAN during the lunch hour (i.e. from 12:00 to 13:00).

**9. How should an EP tag BCAN for an off-exchange trade between an EP's client and a non-EP counterparty? (3 August 2022)**

In such a scenario, the buying EP or the selling EP (as the case may be) should report this off-exchange trade using the Trade Capture Report message for off-exchange trade of the type of "Overseas" (where only one side of the transaction is an EP), and should tag the buy-side or the sell-side BCAN (as the case may be) to the message when inputting the transaction. For the avoidance of doubt, the EP concerned should report such off-exchange trade (of the type of "Overseas") within 15 minutes after conclusion of the transaction.

## **E. Aggregated orders**

### **1. How to tag the BCAN for aggregated orders and aggregated off-exchange trades? (26 November 2021)**

RRI should tag a specific reserved BCAN value (the number value “2”) to the aggregated order or aggregated off-exchange trade to be submitted to SEHK.

### **2. What is the subsequent reporting requirement for aggregated orders and aggregated off-exchange trades? (Updated on 17 March 2023)**

RRI who originated the aggregated order or aggregated off-exchange trade should submit or arrange to submit the Aggregated Transaction Report via the ECP for aggregated orders that have been executed (fully or partially) and for aggregated off-exchange trades on or before market close on three trading days after the trade date (T+3 day). The Aggregated Transaction Report should contain information concerning the underlying orders (i.e. trade allocations) of an aggregated trade, including BCANs of the Relevant Clients, quantity and price of the securities, etc. of the underlying orders.

For the avoidance of doubt, for aggregated orders that have not been executed, no reporting on the underlying orders (i.e. trade allocations) is required. For an aggregated order that has been partially executed, the RRI only needs to report on the underlying trade allocations of the portion of the order that has been executed.

### **3. Is a RRI allowed to further combine two or more orders routed to it from other RRI(s)? (Updated on 17 March 2023)**

For on-exchange order, a RRI should **not** further combine two or more orders routed to it from other RRI(s). It should ensure that such an order received from another RRI be passed along the intermediating chain for an on-exchange order without any change to the order, including the tagged BCAN.

For OE Trade Reporting (i.e. manual trade), a RRI may further combine two or more trades routed to it from other RRI(s), please refer to SFC’s [FAQ](#) for more details.

### **4. Can the reserved BCAN value “2” be used on multiple orders coming from the same client? (3 August 2022)**

No, multiple orders placed by the same client of a RRI will not constitute an “aggregated order” for the purpose of the HKIDR.

## **F. Technical questions (for IT Developers)**

### **1. What does the value of “Trade ID (OTP-C)” in field 10 of the BCAN Error Report of the HKIDR [File Interface Specification](#) refer to? (28 January 2022)**

It refers to the Trade Match ID/ Trade ID of all kinds of trades, i.e. auto-matched trade, odd lot/ special lot trade, manual trade. Please refer to the following corresponding fields in the HKEX OCG-C Binary/FIX Trading Interface Specification for details:

#### **OCG-C Binary Trading Interface Specification**

##### Auto-matched Trade

7.6.7.10 Trade (Board lot Order Executed) – “Trade Match ID”

##### Odd lot/Special lot Trade

7.6.7.12 Trade (Odd lot/Special lot Order Executed) – “Trade Match ID”

7.8.2.2 Trade (Odd Lot/Special Lot) Accepted – “Trade ID”

##### Manual Trade

7.8.2.1 Trade (Off Exchange) Accepted – “Trade ID”

#### **OCG-C FIX Trading Interface Specification**

##### Auto-matched Trade

7.7.7.8 Trade (Board lot Order Executed) – “Tag 880 TrdMatchID”

##### Odd lot/Special lot Trade

7.7.7.10 Trade (Odd lot/Special lot Order Executed) – “Tag 880 TrdMatchID”

7.9.3.2 Trade Accepted (AE) – Semi-automatic Odd lot/Special lot Trade – “Tag 1003 TradeID”

##### Manual Trade

7.9.3.1 Trade Accepted (AE) – Off Exchange Trade – “Tag 1003 TradeID”

**2. Are there any samples for the FIX Trade Capture Report (TCR) message with BCAN field specified? (28 January 2022)**

Below are some FIX TCR samples:

<b>TCR Sample 1 – Submit Privately Negotiated Trade</b>	8=FIXT.1.1^9=327^35=AE^49=CO08201001^56=HKEXCO^34=1 2^52=20211229-09:29:47.018771^1128=9^571=4^487=0^85 6=0^828=22^1123=1^31=46.2^32=10000^60=20211229-09:2 9:47.018771^552=2^54=2^453=3^448=1111^447=D^452=1^4 48=100006^447=D^452=75^448=CE0001.50001^447=D^452=3 ^576=1^577=0^18=c x^528=A^58=Sample1^54=1^453=1^448 =2222^447=D^452=17^48=5^22=8^207=XHKG^10=066^
<b>TCR Sample 2 – Submit Overseas Trade (Buy Side)</b>	8=FIXT.1.1^9=288^35=AE^49=CO08201001^56=HKEXCO^34=1 7^52=20211229-09:31:17.034405^1128=9^571=5^487=0^85 6=0^828=104^1123=6^31=46.2^32=10000^60=20211229-09: 31:17.034405^552=1^54=1^453=3^448=1111^447=D^452=1^ 448=100006^447=D^452=75^448=CE0001.50001^447=D^452= 3^576=1^577=0^528=A^58=Sample2^48=5^22=8^207=XHKG^1 0=210^
<b>TCR Sample 3 – Submit Internal Cross Order Trade (a.k.a. Direct Trade)</b>	8=FIXT.1.1^9=333^35=AE^49=CO08201001^56=HKEXCO^34=2 3^52=20211229-09:32:22.588699^1128=9^571=7^487=0^85 6=0^828=102^1123=1^31=46.2^32=522^60=20211229-09:32 :22.588699^552=2^54=2^453=3^448=1111^447=D^452=1^44 8=100007^447=D^452=75^448=CE0001.50001^447=D^452=3^ 576=1^577=0^528=A^58=Sample3^1115=A^54=1^453=1^448= CE0001.50002^447=D^452=3^48=5^22=8^207=XHKG^10=068^
<b>TCR Sample 4 – Purchasing Side Reports BCAN Field to Exchange (TradeReportType =Addendum)</b>	8=FIXT.1.1^9=250^35=AE^49=CO08201001^56=HKEXCO^34=4 1^52=20211229-09:37:55.565785^1128=9^571=13^1003=70 0000000014^487=0^856=4^1123=6^31=465.5^32=5000^60=2 0211229-09:37:55.565785^552=1^54=1^453=2^448=1111^4 47=D^452=1^448=CE0001.4000100^447=D^452=3^48=700^22 =8^207=XHKG^10=234^
<b>TCR Sample 5 – Submit Semi- automatic Odd lot/Special lot Trade</b>	8=FIXT.1.1^9=332^35=AE^49=CO08201001^56=HKEXCO^34=5 7^52=20211229-09:42:21.801858^1128=9^571=13^487=0^8 56=0^828=102^1123=1^31=30.785^32=359^60=20211229-09 :42:21.801858^552=2^54=1^453=3^448=1111^447=D^452=1 ^448=2000099^447=D^452=75^448=CE0001.50001^447=D^45 2=3^576=1^577=0^528=P^58=Sample5^54=2^453=1^448=222 2^447=D^452=17^37=2050^48=17^22=8^207=XHKG^10=003^

Note:

^ Represents the Start of Header (SOH) separator



## G. General

### 1. What are the key differences between the HKIDR and the Northbound Investor ID Regime that was implemented in 2018? (Updated on 12 December 2022)

The following table summarizes some of the key differences between the two investor identification regimes for reference:

Areas	NB Investor ID	HKIDR
Key sources of rules and regulations	Rules of the Exchange	SFC's Code of Conduct and Rules of the Exchange
(A) BCAN Assignment		
BCAN format and party assigning the BCAN	Maximum of 10 digit assigned by China Connect Exchange Participant (CCEP) or Trade-through Exchange Participant (TTEP)	Maximum of 10 digits assigned by Relevant Regulated Intermediaries (RRI)*
Client level to be assigned	Level down to until the client is not an affiliate**	Level down to until the account owner is not a RRI (no matter the client is an affiliate or not)
BCAN tagging format	BCAN only	The CE number of the RRI who assigns the BCAN + BCAN  (e.g. ABC123.1234567890, ABC123 is the Central Entity (CE) number while 1234567890 is the BCAN)
Same client to have multiple BCANs	Not allowed (except for certain situations e.g. joint account, different accounts in affiliates and	Allowed  RRI can assign single or multiple BCANs to a client if the client holds multiple

	CCEPs/TTEPs (but not different trading desks within the same legal entity) and a TTEP trade through multiple CCEPs)	accounts (i.e. different BCAN can be assigned to different account)
ID documents	No specified order of priority for ID documents  For corporate entities, Business Registration Certificate is <b>NOT</b> acceptable as ID document. Only Certificate of Incorporation / other official incorporation documents and Legal Entities Identifier are accepted	Specified order of priority for ID documents per waterfall***  Business Registration Certificate is acceptable as ID document per the requirements set out in the SFC's Code of Conduct
	BCAN registration cutoff time	By 3:00pm on T-1 day for all clients
	BCAN change for same client	Prior approval from HKEX is required
Pass on BCAN	Not applicable as BCANs are assigned by CCEP/TTEP and the relevant CCEP will input the orders to HKEX's trading system directly	If an order is routed through a chain of RRIs, each RRI along the chain need to pass on the BCAN assigned by the first RRI
(B) Trading		
Transactions covered	On-exchange orders only	On-exchange orders and Off-exchange transactions (i.e. manual trades) (optional for odd lots)

<p>BCAN checking and order rejection on the trade date (T day)</p>	<p>Real time format checking and validation against BCAN database in place</p> <p>If an invalid or non-registered BCAN is tagged, the order may be rejected by the relevant Mainland stock exchange</p>	<p>Only real time format checking in place</p> <p>No order rejection if an invalid or non-registered BCAN is tagged, but RRIs may be subject to follow-up enquiries by the SFC and/or SEHK for potential non-compliance issues</p>
<p>Aggregated orders</p>	<p>Not applicable</p>	<p>Applicable for an on-exchange order or an off-exchange order or trade which comprises two or more orders for the same listed security placed by different clients of an RRI; subsequent reporting of BCAN of the underlying orders of an executed aggregated order (regardless of board lot or odd lot) up to three days after the trade date (T+3) is required</p>
<p>Reserved BCAN values</p>	<p>For “sell-only” orders****:  “1” – for individual clients  “2” – for institutional clients</p>	<p>“1” – for “sell-only” orders****  “2” – for aggregated orders</p>

\* For those EPs who are registered as CCEP or TTEP, they may assign the same (i.e. randomly assigned number not exceeding 10 digits) or different BCANs to a client under both regimes.

\*\* (A) if a CCEP’s/TTEP’s direct client which is an affiliate will buy or sell China Connect Securities as principal or on a proprietary basis, the CCEP/ TTEP can assign a BCAN to the affiliate; and (B) if a CCEP’s/ TTEP’s direct client is a fund manager and/or a fund, the relevant requirements for fund / fund manager shall apply.

\*\*\* The waterfall requirements on the collection of CID are set out in paragraph 5.6(o) of the SFC’s Code of Conduct.

\*\*\*\* If the necessary consent cannot be obtained from an individual (i.e. natural person) Relevant Client by an RRI, the RRI shall only input sell orders for the client in respect of the client's existing holdings. Please also refer to Question D-4.

*(Please note that the key differences set out in the above table are not meant to be exhaustive. Participants and RRIs should seek their own professional advices where necessary to ensure the compliance of the respective rules and requirements under the two regimes.)*