

**Joint further consultation conclusions on enhancements to the OTC derivatives reporting regime for Hong Kong to mandate – (1) the use of Unique Transaction Identifier, (2) the use of Unique Product Identifier and (3) the reporting of Critical Data Elements**

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## Introduction

1. In March 2024, the Hong Kong Monetary Authority (**HKMA**) and the Securities and Futures Commission (**SFC**) issued a joint further consultation paper (**Consultation Paper**) on enhancements to the Over-the-Counter (OTC) derivatives reporting regime for Hong Kong to mandate – (1) the use of Unique Transaction Identifier (**UTI**), (2) the use of Unique Product Identifier (**UPI**) and (3) the reporting of Critical Data Elements (**CDE**).
2. Comments were invited on the HKMA's and SFC's joint proposals in relation to mandating the reporting of the UTI, UPI and CDEs as well as the adoption of the ISO 20022 standard for submission of OTC derivatives transactions to the trade repository operated by the HKMA (**HKTR**). The proposals sought to adopt the technical guidance published by the Committee on Payments and Market Infrastructures and the International Organization of Securities Commissions (**CPMI-IOSCO**) on the UTI, UPI and CDEs (namely, the **UTI Technical Guidance**, **UPI Technical Guidance** and three versions of **CDE Technical Guidance**) to facilitate the international standardisation and harmonisation of data elements reported across international OTC derivatives reporting regimes.
3. We received a total of 12 submissions during the consultation period. Respondents included financial institutions, industry bodies, an exchange and clearing house group, standard setting organizations and a trade repository. The list of respondents is included in Appendix A and the full text of their comments can be viewed on the HKMA's and the SFC's websites.
4. We received general support for our proposals and many constructive comments. Apart from the formal consultation process, the HKMA and the SFC also held follow-up discussions with several respondents to soft-consult our conclusions and clarify their concerns. The relevant feedback has been incorporated into our proposals. This paper summarises the general comments, together with our responses and the way forward for implementing our proposals. It should be read together with the Consultation Paper and all comments received. Detailed comments and responses from the HKMA and the SFC on the specific proposed data elements are set out in Appendix B. In the interest of maintaining the brevity and relevance of this paper, comments outside the scope of the Consultation Paper (e.g. reporting issues in relation to products subject to the current reporting requirements and reporting arrangement for the Connect Schemes) will be followed up outside this paper.

## Summary of conclusions – mandating the use of UTI

5. Our proposal requires UTI to be generated with the steps that are based on the waterfall of factors set out in the UTI Technical Guidance (**TG Waterfall**), which are largely equivalent to those adopted by other major jurisdictions. Although no respondents opposed the proposal, some suggested alternative approaches which are not globally-harmonised UTI generating steps. Given the importance of not deviating from the global harmonisation and standardisation of trade identification,

we will mandate the requirement to report standardised UTI according to the steps as proposed in the Consultation Paper. To provide flexibility, we will adopt the UTI Technical Guidance principle to allow the delegation of UTI generation from one party to another for the later steps as long as a bilateral agreement between the counterparties is in place. This should strike a balance between the needs for harmonisation and flexibility.

6. Respondents generally agreed to the proposed arrangements regarding the use of interim UTI and we will therefore implement the relevant proposals as set out in the Consultation Paper.
7. The majority of responses are supportive of the proposed implementation date of UTI (i.e. 29 September 2025). Therefore, the proposed UTI implementation date of 29 September 2025 will not be changed.

### Summary of conclusions – mandating the use of UPI

8. There is overwhelming support for the proposals to mandate the use of UPI for the underlying derivatives of each transaction submitted to the HKTR and the full adoption of the UPI Technical Guidance and the ISO 4914 standard for the structure and format of UPI. We will therefore mandate the use of UPI as proposed.
9. Several respondents raised the issue of not being able to identify the asset class for digital asset and crypto derivatives, which are relatively novel products in the OTC derivatives markets and may not fit into any of the traditional 5 asset classes. Given that the Digital Token Identifier (**DTI**) has been proposed as an allowable reportable value in the upcoming consultation of version 4 of the CDE Technical Guidance, we will accommodate the use of DTI in our reporting requirements.
10. Regarding the UPI implementation timeline, respondents generally do not have comments but one suggested that the HKMA and the SFC consider extending the implementation date as the industry may need more time to establish a mechanism to resolve divergent views on product types arising from limitations or differences in trade booking systems. Regarding this, as many jurisdictions are implementing the UPI in 2024, it is expected that market participants should have developed familiarity and know-how by the time of the implementation in Hong Kong. Therefore, we believe that it is appropriate to implement mandatory reporting of UPI from 29 September 2025.

### Summary of conclusions – mandating the reporting of CDEs

11. In response to the comments that the number of CDE data elements proposed to be mandated is considerably more than those in other Asia-Pacific (**APAC**) jurisdictions, the HKMA and the SFC have re-assessed the need for some of the data fields and have decided not to mandate a number of proposed data fields which provide information that can be derived from other data fields, or may serve a similar purpose to other data fields. We will also turn a number of proposed data fields into

optional data fields to the extent that doing so will not compromise the efficient monitoring of markets. These changes will bring down the number of our mandated data fields to be in the range of that in the EU, the US and other APAC jurisdictions.

12. As some respondents sought clarification on the requirements for re-reporting live legacy trades, we have further explained the requirements in this Conclusion Paper, with further flexibility on the templates used for re-reporting. We also acknowledge that it may be difficult to obtain or retrieve retrospectively certain data fields generated or confirmed at the inception of a transaction. Therefore, we will provide the flexibility to re-report those data fields for live legacy trades on a best effort basis.
13. Regarding the implementation timeline, the majority of the respondents supported to implement the CDEs in September 2025. Therefore, we will require reporting entities to report all new transactions and their lifecycle events based on the data fields and supportable value set out in Appendix B starting from 29 September 2025.

## Summary of conclusions – adoption of the ISO 20022 XML message standard

14. Respondents were largely supportive of the proposal to adopt the ISO 20022 XML message standard for OTC derivatives reporting to the HKTR and to implement it at the same time as the UTI, UPI and CDE in a “big bang” approach. Therefore, we will require reporting entities to adopt the ISO 20022 XML message standard as outlined in the Consultation Paper starting from 29 September 2025.
15. To facilitate the implementation of our proposals, updates to the technical specifications in the HKTR Administration and Interface Development Guide (**AIDG**) are published at the same time as this conclusions paper is released, allowing 12 months in advance of the implementation date for preparation as anticipated by the majority of market participants. Updates to the Supplementary Reporting Instructions for OTC Derivatives Transactions (**SRI**) and Frequently Asked Questions (**FAQs**) will also be published in due course to provide further guidance on how the data elements should be reported.
16. The HKMA and the SFC would like to thank all respondents for their comments. Your feedback has been most useful in helping us finalise various aspects of the regime.

## Comments and Conclusions to the Consultation

### (I) Mandating the use of UTI

#### *Steps and approach for generating UTI*

17. We proposed in the Consultation Paper to require UTI to be generated with the steps that are based on the waterfall of factors as set out in the UTI Technical Guidance (**TG Waterfall**), which are largely equivalent to those adopted by other major jurisdictions, e.g. the final EU REFIT rules published by the European Securities and Markets Authority (**ESMA**). Although no respondent opposed the proposal, some suggested alternatives such as requiring market makers to generate UTI or adopting the UTI ISDA Logic<sup>1</sup> instead. As these are not globally harmonised UTI generating steps and given the importance of not deviating from the global harmonisation and standardisation of trade identification, especially for cross-border trades, we will mandate the requirement to report standardised UTI according to the steps as proposed in paragraph 25(a)-(e) of the Consultation Paper.
18. That said, a number of respondents suggested that avenues for bilateral agreement between counterparties for UTI generation could be incorporated within the TG Waterfall to provide some operational flexibility. This can deal with disputes arising from differences in time zone and execution time, or situations where a specified person faces difficulties in determining the UTI generating entity in accordance with the mandated steps. Based on the UTI Technical Guidance, delegation of UTI generation responsibility is allowed, provided that the delegated UTI generation entity can produce the UTI in accordance with the structure and format as stated in the guidance. We expect that the steps to determine the UTI generating entity will be sufficiently clear to market participants based on our proposed steps (a) and (b) as set out in paragraph 25 of the Consultation Paper. For later steps, we will adopt the UTI Technical Guidance principle to allow delegation of UTI generation from one party to another as long as a bilateral agreement between the counterparties is in place. This should strike a balance between the needs for harmonisation and flexibility.
19. One respondent mentioned that disputes could arise from the co-existence of different UTI values generated by both counterparties to a trade during reporting, and that the HKMA and the SFC could consider restricting UTI value re-generation when market participants re-book trades in their internal systems as a measure to reduce reporting challenges. Regarding this, we would like to clarify that the co-existence of different UTI values generated by both counterparties is not expected. Referring to section 3.2 of the UTI Technical Guidance, when a UTI is allocated to a reportable transaction, it should remain the identifier for that transaction throughout its life. When a transaction is terminated and replaced with one or more other transactions, new UTI(s) should be used. For the avoidance of doubt, no new

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<sup>1</sup> The UTI ISDA Logic modifies some of the steps in the TG Waterfall and supplements with a sell-side letter for reporting entities to agree with their clients for the sell side to generate the UTI after the first 3 steps of the TG Waterfall.

UTI should be generated for re-booking trades unilaterally in the internal system of a reporting entity due to internal operational needs.

20. One respondent sought to clarify whether the proposed UTI implementation covers all OTC derivatives transactions including both cleared and non-cleared OTC derivatives transactions with bilateral settlement. As mentioned in paragraph 18 of the Consultation Paper, it is proposed that each transaction submitted to the HKTR must be identified by a UTI. Therefore, this will include cleared and non-cleared OTC derivatives transactions.
21. Another respondent asked whether the trade repository shall be responsible for generating the UTI. As stated in paragraph 17 above, UTI should be generated according to the steps in paragraphs 25(a)-(e) of the Consultation Paper. That said, as mentioned in paragraph 18 above, reporting entities may delegate the UTI generation to a third party (e.g. a trade repository). Notwithstanding that a trade repository may generate UTIs, the HKTR is not prepared to provide the UTI generation service.

### *Proposals relating to the use of interim UTI and the procedures of replacing the interim UTI*

22. We proposed in the Consultation Paper that reporting entities are required to provide /obtain the UTI in a timely manner for complying with relevant reporting requirements. In the event that the reporting entity does not receive a UTI from the UTI generating entity in sufficient time for reporting, we proposed the reporting entity should report an interim UTI according to the requirements set out in paragraph 32 of the Consultation Paper. Respondents generally agreed to the proposed arrangements.
23. A number of respondents sought to clarify the detailed procedures of replacing the interim UTI with the actual UTI after it has been received (e.g. "Event Type" and "Action Type" to be used for the update of the transaction) and whether the interim UTI should be reported under "Prior UTI" when reporting the actual UTI. The technical requirements for the kind of action type and event type that should be applied for reporting a specific action /event will be specified in the AIDG. For instance, the Action Type "Error" should be used to exit the trade with the interim UTI, while the Action Type "NEW" and Event Type "Trade" should be used when resubmitting the trade with both the actual UTI and prior UTI (i.e. the interim UTI) included.
24. One respondent suggested leaving the UTI data field blank rather than providing the interim UTI for easing operational burdens. The UTI data field of a trade cannot be left blank as it is an essential data field for system validation and leaving it blank will lead to a rejection of trade submission.
25. One respondent requested changing the time frame for replacing the interim UTI with the actual UTI from "no later than two business days after obtaining the actual UTI" to "as soon as possible". We take the view that maintaining "no later than two

business days after obtaining the actual UTI” is appropriate. Reporting entities should note that the use of interim UTI is a relief measure to avoid late reporting and the proposed time frame should be the same as the original time frame for reporting a trade with a UTI included (i.e. T+2).

26. In general, the interim UTI aims to facilitate reporting entities to report trades to the HKTR on time (i.e. within T+2) when UTI is not yet available to the UTI receiving party, especially in the early implementation stage when market participants are still getting familiar with the TG Waterfall and operation process. It is expected that the timeframe for adopting UTI in Hong Kong would allow sufficient time for operational difficulties to be worked out, therefore the use of interim UTI should be minimal.

### *UTI Implementation timeline*

27. Regarding the proposal to mandate the use of UTI in submitting transactions to the HKTR from 29 September 2025, the majority of responses are supportive of the proposed implementation date, though one respondent cited that some banks may require more than 12 months for implementation.
28. We would like to bring to light that major jurisdictions including Australia, Japan, the EU, the UK and Singapore are implementing mandatory reporting of UTI in 2024. It is expected that ample experience and established procedures in the industry should be in place by the time of Hong Kong's implementation, which may alleviate most of the foreseen operational challenges encountered by reporting entities. Considering this, we believe that the proposed implementation timeline should be sufficient for reporting entities to implement the new UTI reporting requirements and therefore the proposed UTI implementation date of 29 September 2025 will not be changed.
29. Although the mandatory use of UTI for Hong Kong reporting entities is still 12 months ahead, some reporting entities may want to coordinate their global UTI implementation and start early reporting of UTI in Hong Kong before our official implementation. To accommodate this need, we have incorporated the UTI-related data fields into the HKTR reporting templates since December 2022 to provide flexibility for optional early implementation. Reporting entities are encouraged to start reporting UTI as soon as possible.

### **(II) Mandating the use of UPI**

30. There is overwhelming support for the proposals to mandate the use of UPI for the underlying derivatives of each transaction submitted to the HKTR and the full adoption of the UPI Technical Guidance and the ISO 4914 standard for the structure and format of UPI. We will therefore mandate the use of UPI as proposed.



### *Potential difficulties in obtaining UPI from designated UPI provider*

31. Two respondents commented that the industry is currently facing challenges in obtaining an appropriate UPI code for some non-conventional products as the UPI service is still a new set-up by the designated UPI provider, the Derivatives Service Bureau (**DSB**). Regarding this, one respondent suggested that the HKMA and the SFC consider allowing flexibility in reporting of non-UPI product identifiers. Although the “UPI” data field must be populated with the UPI – ISO 4914 format, we understand that there is a catch-all UPI “other” product code for underliers that cannot be classified in the DSB system. The HKMA and the SFC acknowledge the industry’s difficulties and support the reporting of non-UPI product identifiers in the data fields “Underlier ID (Other)” and “Underlier ID (Other) source” when the UPI code is obtained via the “other” category.

### *Asset class of digital asset / crypto derivatives*

32. Several respondents raised the issue of not being able to identify the asset class for digital asset and crypto derivatives, which are relatively novel products in the OTC derivatives markets and may not fit into any of the traditional 5 asset classes. Some respondents proposed the utilisation of the Digital Token Identifier (**DTI**) as a remedy, given it has recently been introduced into the UPI - ISO 4914 format to unambiguously identify crypto-asset underliers for OTC derivatives.
33. The HKMA and the SFC note that the DTI complements a number of other identifiers apart from the UPI, such as the ISO 6166 International Securities Identification Number (**ISIN**). We are also aware that the ESMA has spearheaded the move to require the use of DTI for the standardised identification of crypto-assets since October 2023, implying that DTI will be the core reference point for crypto asset service providers across the EU. Given that the DTI has been included in the data field “Underlier ID (OTHER)” as an allowable value in the upcoming consultation of version 4 of the CDE Technical Guidance, we will accommodate the use of DTI in our reporting requirements. In the meantime, we will keep abreast of the conclusion of the CDE Technical Guidance and developments in other jurisdictions concerning the relevant UPIs and asset class for digital assets and crypto derivatives to align Hong Kong’s reporting requirements with international practices.

### *UPI Implementation timeline*

34. Most respondents did not have comments on the proposed UPI implementation timeline although a respondent commented that different views on product types between counterparties may exist due to limitations or differences in trade booking systems. This may potentially lead to disputes between counterparties, and it would take time for the industry to establish a mechanism to resolve divergent views. To this, the respondent suggested that the HKMA and the SFC consider an extension of the UPI implementation date.

35. One respondent also raised the point that the UPI and CDE are new reporting items which lack comprehensive system support, and suggested that the HKMA and the SFC consider postponing the adoption of the UPI and CDE after the launch date of ISO 20022 (planned for November 2025).
36. Our view is that the UPI service provided by the DSB will have been in place for almost 2 years when we implement ours in September 2025, with market participants already reporting relevant UPIs for major jurisdictions such as ASIC, CFTC, EMIR, UK EMIR, JFSA and MAS regimes. It is expected that familiarity and knowhow amongst market participants should have been in place. In addition, based on our understanding, the launch of ISO 20022 has already been in place since March 2023 (see the ISO 20022 section for details). Therefore, we believe that it is appropriate to implement mandatory reporting of UPI on 29 September 2025.

### (III) Mandating the reporting of CDEs

#### *Approaches to Critical Data Elements*

37. Several respondents reflected that the number of CDE data elements proposed to be mandated is considerably more than those in other APAC jurisdictions and this will impose an undue burden on reporting institutions in Hong Kong.
38. Following a further review of our proposed data elements, the HKMA and the SFC acknowledge the room to optimise the number of mandated data fields. To this end, we will not mandate a number of proposed data fields which provide information that can be derived from other data fields, or may serve a similar purpose to other data fields (i.e. those data fields will be removed from the Hong Kong reporting scope entirely). We will also turn a number of proposed data fields into optional data fields to the extent that doing so will not compromise the efficient monitoring of markets (i.e. reporting entities are encouraged to populate those data fields on a best effort basis, but leaving those data fields blank will not breach the reporting requirements). Only two data fields will be added as a “consequential amendment”<sup>2</sup>. We believe the above changes<sup>3</sup> will help balance our regulatory needs while mitigating potential reporting burdens faced by reporting entities operating in Hong Kong. It will also bring down the number of our mandated data fields to be in the range of that in the EU, the US and other APAC jurisdictions.
39. To save efforts in monitoring internal control, one respondent sought relief during the interim period (until the go-live date) from reporting data fields which will no longer be required after September 2025. We do not think this is appropriate, as it

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<sup>2</sup> The two additions do not require “new” information. One addition is to report the name of Counterparty 2 as a result of the relief to allow for reporting of a waterfall of identifiers for Counterparty 2. Another addition is “Single barrier level” which is split from the two proposed barrier level data fields as a result of a system logic change in the final ISO standard. Please refer to row numbers 7A and 203A of Appendix B for details.

<sup>3</sup> See mark-ups in Appendix B for the changes to the proposed data fields.

may compromise the data quality of the existing data set, which remains very important to our current regulatory functions. Reporting entities are reminded to comply with all the existing reporting requirements during the interim period. Business as usual is expected. The relevant data quality controls should have been in place for reporting the existing reporting requirements without extra effort.

### *Transaction direction*

40. Regarding the method of reporting information related to the trade direction, we received no objections to our proposal to report the direction of the trade from the reporting entity's perspective. Hence the proposed approach will be adopted in line with the common approach by ESMA and some APAC jurisdictions.

### *Collateral portfolio code*

41. Two respondents pointed out that both "Collateral Portfolio Code" and a pair of Initial Margin (**IM**) / Variation Margin (**VM**) Collateral Portfolio Codes were included in the proposed CDE fields, while the international practice is to utilise either the Collateral Portfolio Code or the pair of the IM / VM Portfolio Codes instead of both.
42. Following our review, we acknowledge that major jurisdictions including the EU, Singapore and Australia only utilise either the Collateral Portfolio Code or the pair of IM / VM Collateral Portfolio Codes. Hence, we will not mandate the "Collateral Portfolio Code" field to align with major APAC jurisdictions.
43. We note the ambiguity when reporting a collateral portfolio which does not distinguish between IM and VM with the adoption of the pair of IM / VM Collateral Portfolio Codes. The HKMA and the SFC will issue further guidance in the SRI on how to report in this situation by making use of the data field "Initial margin collateral portfolio code" or "Variation margin collateral portfolio code".
44. One respondent sought clarification of the frequency of reporting collateral updates. We wish to remind reporting entities that the frequency of reporting collateral updates should be in line with the relevant margin requirements. For IM which is currently required to be recalculated every 10 business days, reporting entities should, at a minimum, report IM updates every 10 business days. However, they are also welcome to report IM updates on a daily basis to be in line with the reporting of the VM updates (which is currently required to be recalculated daily). For the avoidance of doubt, reporting valuation updates (including the reporting of delta value) should be made on a daily basis as prescribed by the reporting rules.
45. Respondents have no objections to most of the proposed data fields related to collateral and margin. We will therefore implement them as proposed, save for the "Collateral Portfolio Code" mentioned above, and 4 data fields related to excess collateral, which will be turned optional. Please refer to Appendix B for details.

### *Proposals in relation to re-reporting live legacy trades*

46. As the majority of respondents did not oppose our proposals related to live legacy transactions, we will adopt the proposed approach to require the re-reporting of live legacy transactions with a remaining maturity of more than 1 year as of the implementation date, with a 6-month transitional period for the re-reporting.
47. One respondent suggested that the HKMA and the SFC consider waiving the re-reporting requirement for legacy transactions regardless of maturity in view of the large amount of manual resources needed. It also cited that it would be unfeasible for market participants to meet the implementation date since feasibility studies, UPI mapping and alignment and contribution of reporting information under CDE would be required. The respondent also proposed not to require the usage of UTI for the reporting of live legacy transactions after the implementation date.
48. While the HKMA and the SFC recognize that effort is needed for the re-reporting of live legacy trades, we wish to emphasize that re-reporting is a step to update the long-dated trades with CDE standard and it is also an essential step to migrate the live legacy data set to integrate into the post-implementation data set. It would maintain data integrity and provide valuable information for regulators. Additionally, our proposal has provided relief for short-dated trades and is largely adhered to international standards. As mentioned in paragraph 55 of the Consultation Paper, the reporting of UTI and UPI is not required for re-reporting. We believe that our proposed approach adequately balances the regulators' needs and market participants' compliance burden.
49. The HKMA and the SFC also acknowledge and understand that linking/matching breaks could arise during the 6-month transitional period as reporting entities could be re-reporting live legacy trades at different timeframes. In view of this, reporting entities are not required to reconcile breaks caused by differences in reporting timeframe during the transitional period, but should continue to do so for unlinking of trades or discrepancies arising from all other causes.

### *Templates used for re-reporting live legacy trades*

50. A number of respondents raised concerns regarding the proposed approach to utilise the pre-implementation template for re-reporting lifecycle events of live legacy trades in situations as described in paragraphs 57-58 of the Consultation Paper, which could lead to increased operational and cost burden since maintaining two separate report flows and controls in parallel will be required (i.e. the pre-implementation reporting template for certain live legacy trades and the new reporting template for new trades and other live legacy trades).
51. To provide further flexibility, we allow and encourage re-reporting of live legacy trades in the new reporting template in all scenarios, but recognise that some reporting entities may not have capability to immediately demise the pre-implementation template. Therefore, the option to re-report lifecycle events of live legacy trades with the pre-implementation template will still be provided in

situations as described in paragraphs 57-58 of the Consultation Paper. We will provide further guidance in the SRI on how to re-report live legacy trades.

### *Required data fields for re-reporting live legacy trades*

52. One respondent expressed difficulties in reporting certain new data elements for live legacy trades (e.g. *settlement location, basket constituent unit of measure, basket constituent number of units, underlying asset trading platform identifier, underlying asset price source and series version*) and suggested making these fields optional for re-reporting of live legacy trades.
53. For the re-reporting of live legacy transactions, we acknowledge that it may be difficult to obtain or retrieve retrospectively certain data fields generated or confirmed at the inception of a transaction. Therefore, we will allow re-reporting of **transactional fields** (i.e. data fields in which information was obtained at the inception of a transaction) for live legacy trades on a best effort basis.
54. That said, reporting of **continuous fields** for live legacy trades must be maintained after re-reporting. These include data fields that require regular updates regardless of whether any subsequent event take place such as data fields relating to valuation, delta, collateral and margin information of the transaction. For the avoidance of doubt, reporting entities are not required to re-report the values of collateral of a live legacy trade for the timeframe prior to the implementation date.

### *Action type, event type and trade identifier to be adopted for re-reporting of live legacy trades*

55. A number of respondents sought to clarify the detailed procedures of re-reporting legacy data, such as the "Event Type" or "Action Type" to be used. Additionally, one respondent pointed out that since a number of transaction identifiers are currently allowed by the HKTR, guidance should be provided to unify a single legacy transaction identifier for consistency in re-reporting legacy transactions and any associated lifecycle events.
56. In the pre-implementation template, reporting entities should submit a "quit" trade event for the transaction to prevent double counting of reported trades. In the new reporting template, re-reporting of legacy trades should be completed with the Action Type "NEW" and Event Type "Update". As mentioned before, the generation of a new UTI is not required for re-reporting a live legacy trade. Reporting entities may populate one of the existing trade identifiers (whether it is a USI, TID or other shared-and-paired trade identifiers) for the re-reported trade. We will not mandate the type of trade identifier adopted to give more flexibility. Also, reporting entities are not required to reconcile breaks caused by differences in adopting different trade identifier for re-reported trades.

### *CDE Implementation timeline*

57. The majority of the respondents supported the implementation of the CDEs in September 2025, except that one respondent requested additional time for preparation. Therefore, we will require reporting entities to report all new transactions and their lifecycle events based on the data fields and supportable value set out in Appendix B starting from 29 September 2025.

### **(IV) Adoption of the ISO 20022 XML message standard**

58. Respondents were largely supportive of the proposal to adopt the ISO 20022 XML message standard for OTC derivatives reporting to the HKTR and to implement it at the same as the UTI, UPI and CDE in a “big bang” approach. Therefore, reporting entities are required to adopt the ISO 20022 XML message standard as outlined in the Consultation Paper.
59. One respondent suggested that the HKMA and the SFC reconsider implementing reporting on the ISO 20022 XML message standard and retain the current comma-separated value (**csv**) upload method, since the implementation will require fundamental IT changes and the complexity of XML messages does not allow manual operation.
60. Since this standard is required by the EU regulator and has been proposed for adoption by the US and many APAC regulators, we believe that the operational burden can mostly be alleviated during the implementation period by referencing the established practices in other jurisdictions.
61. A number of respondents suggested that the HKTR adopt the same XML schema versions adopted by DTCC for ASIC / MAS in order to maximize synergies and efficiencies. We confirm that the HKTR will adopt the version auth. 030.001.04 XML schema, which is in line with the same XML schema version adopted by ASIC and MAS at the time of writing this conclusions paper.

### *Intraday lifecycle event reporting approach*

62. A respondent has requested further guidance on various aspects of the implementation of the intraday lifecycle event reporting (i.e. the reporting of every intraday life cycle events rather than providing just the day-end snapshot report of the events). We would like to bring to light that throughout the past few years, some APAC jurisdictions have already stipulated the reporting of intraday lifecycle event. For example, the ASIC has been requiring intraday lifecycle event reporting for equity derivatives, CFDs and Margin FX products. Furthermore, ASIC and MAS will require all OTC derivatives products to be reported using the intraday lifecycle method starting from 21 October 2024.
63. Against the backdrop of the increasing international adoption of the intraday lifecycle event reporting approach, we would encourage market participants to

adopt this reporting approach as soon as practical, since Hong Kong's OTC derivatives regulatory framework may likely follow suit after the implementation of the CDE harmonisation with a view to facilitate global harmonization.

64. That said, the reporting of intraday lifecycle events is not mandatory currently and the flexibility to report lifecycle events as either end-of-day snapshots or intraday events will continue to be provided until prescribed otherwise. We believe that this accommodation adequately alleviates the burdens faced by the industry during the CDE implementation.

## Concluding Remark and Way Forward

65. Since the implementation of Hong Kong's OTC derivatives market regulatory framework in 2015, strides have been made in the development and enhancement of the framework under the joint efforts of regulators, market participants and the international community alike. This conclusions paper signifies another milestone in the continuous reform of existing requirements.
66. We have updated the AIDG package to facilitate the implementation of the proposed enhancements to Hong Kong's OTC derivatives reporting regime. An updated SRI and FAQs will also be provided in due course. The revised versions of the documents will incorporate the changes relevant to the UTI, UPI and CDE implementation exercise. It is expected that the pending definition and format of certain data fields will be finalised in the to-be-published final report of the CDE Technical Guidance version 4 (tentatively by the first quarter of 2025) and an updated list of data fields will be published in gazette notice thereafter to be effective on 29 September 2025.
67. Moving ahead, the HKMA and the SFC will continue to keep abreast of the development of protocols in other major jurisdictions and proactively raise issues in the international forum for discussion when necessary. We will also maintain a close dialogue with the market throughout the preparation and implementation period to facilitate a smooth transition and implementation process. Views and discussions from stakeholders are welcome throughout the continuous process of enhancing Hong Kong's OTC derivatives market regulatory framework.



## Appendix A – List of Respondents

(In alphabetical order)

1. Bloomberg LP
2. Digital Token Identifier Foundation
3. International Organization for Standardization
4. The Depository Trust & Clearing Corporation
5. The Derivatives Service Bureau Ltd
6. The Hong Kong Association of Banks
7. The International Swaps and Derivatives Association
8. The Law Society of Hong Kong
9. *Anonymous – **two** respondents requested their identities to be withheld from publication*
10. *Anonymous – **two** respondents requested their identities and submission contents to be withheld from publication*

## Appendix B – Summary of Comments and Regulators’ Responses to Proposed CDE Data Fields

The following data fields will be mandated and gazetted for the purpose of OTC derivatives reporting requirements from 29 September 2025. Please refer to the AIGD for a full list of data fields that are technically supported by HKTR and the relevant technical specifications (including optional and administrative data fields). The last column specifies the mandatory requirement for each respective data field.

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
1	Effective date	<p><del>Unadjusted date at which obligations under the OTC derivative transaction come into effect, as included in the confirmation, if applicable.</del></p> <p><del>If the effective date is not specified as part of the terms of the contract, the counterparties shall report in this field the date of execution of the derivative.</del></p> <p>[Unadjusted date at which obligations under the OTC derivative transaction come into effect, as included in the confirmation. For new contracts stemming from lifecycle events, the effective date should be the effective date of the new contract. For credit default swaps on a credit index, effective date should be the effective date of the contract, not the roll date of the underlying index. For FRAs, effective date should be the effective</p>	ISO 8601 YYYY-MM-DD, based on UTC.	✓	✓	✓	✓	✓		<p>We understand that a new definition for this data field will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.</p> <p>*The change in square brackets is subject to the final conclusion to version 4 of the CDE Technical Guidance.</p>	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		date of the contract, not the settlement date. For options & swaptions, the effective date should be the effective date of the contract, not the underlier.]*									
2	Expiration date	Unadjusted date at which obligations under the OTC derivative transaction stop being effective, as included in the confirmation, if applicable. Early termination does not affect this data element.	ISO 8601 YYYY-MM-DD, based on UTC.	✓	✓	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
3	Early termination date	Effective date of the early termination (expiry) of the reported transaction, if applicable. This data element is applicable if the termination of the transaction occurs prior to its maturity due to an ex-interim decision of a counterparty (or counterparties). Examples of early terminations (expiry) are: negotiated early termination; early termination under an optional early termination provision ("mutual put"); novation; offsetting (netting) transaction; option exercise; compression; early termination clause specified in the original contract which is a callable swap (bought embedded option); mutual credit break.	ISO 8601 YYYY-MM-DD, based on UTC.	✓	✓	✓	✓	✓	CCP-cleared IRS trades: 1. What is the number of trades to be reported for CCP-cleared trades under the new Scheme (New + Novation / New + Novation + New)  2. How should this field be populated for each of the New / Novated trades?  European option: 3. Should the early termination date be left blank for an European option? (Or that we should fill in the specified expiration date too)	There is no change to the reporting approach on CCP-cleared trade reporting and thus, please follow the Supplementary Reporting Instructions (SRI) and CDE Technical Guidance with respect to the action/event type structure.  Please note that this data field is only required to be reported if applicable. It may be left blank if it is not applicable to a trade. For a European option, there is no change to how it is reported in this respect after the implementation date.	To be mandated
4	Reporting timestamp	Date and time of the submission of the report as reported to the trade repository.	ISO 8601 YYYY-MM-DDThh:mm:ssZ, based on UTC.	✓	✓	✓	✓	✓			To be mandated
5	Execution timestamp	Date and time a transaction was originally executed, resulting in the generation of a new UTI. This data element remains unchanged throughout the life of the UTI.	ISO 8601 YYYY-MM-DDThh:mm:ssZ, based on UTC.	✓	✓	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
6	Counterparty 1	<p><del>Identifier of the counterparty to an OTC derivative transaction.</del></p> <p>[Identifier of the counterparty to an OTC derivative transaction who is fulfilling its reporting obligation via the report in question. In jurisdictions where both parties must report the transaction, the identifier of Counterparty 1 always identifies the reporting counterparty.]*</p>	<p>ISO 17442 Legal Entity Identifier (LEI) Char(20)</p> <p>LEI code that is included in the LEI data as published by the Global LEI Foundation (GLEIF, www.gleif.org/).</p>	✓	✓	✓	✓	✓	<p><b>Comment (i)</b> Does this field (Counterparty 1) generally refer to the reporting party?</p> <p><b>Comment (ii)</b> We agreed with the HKMA's and the SFC's approach to mandate the use of Legal Entity Identifiers ("LEIs") for all entities involved in OTC derivatives transactions.</p> <p>We also would like to point out the importance of renewing LEIs. The annual renewal ensures the legal entity data is up-to-date and accurate. We would recommend that the HKMA and the SFC consider requiring the counterparties to have a renewed LEI, so as to help improve LEI data quality.</p>	<p>Yes, the data field "Counterparty 1" generally refers to the reporting entity who is fulfilling its reporting obligation. It corresponds to the data field "Trade Party 1" of the pre-implementation reporting templates.</p> <p>We understand that a new definition with clearer wording will be proposed in version 4 of the CDE Technical Guidance. We will align with it.</p> <p>*The change in square brackets is subject to the final conclusion to version 4 of the CDE Technical Guidance.</p> <p>For the renewal of LEI, we recognise the benefits of maintaining up-to-date and accurate LEI while balancing the compliance burden for reporting entities to check their counterparties' LEI status. Hence the current guidance in paragraph 73 of the SRI will continue to apply after implementation.</p>	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
7	Counterparty 2	Identifier of the second counterparty to an OTC derivative transaction.	<p>ISO 17442 Legal Entity Identifier (LEI) Char(20) for an LEI code Varchar(72) natural persons who are acting as private individuals (not eligible for an LEI per the ROC Statement - Individuals Acting in a Business Capacity).</p> <p>LEI code that is included in the LEI data as published by the Global LEI Foundation (GLEIF, www.gleif.org/).</p> <p>For natural persons who are acting as private individuals (not eligible for an LEI per the ROC Statement - Individuals Acting in a Business Capacity): LEI of the reporting counterparty followed by a unique identifier assigned and maintained consistently by the reporting counterparty for that natural person(s) for regulatory reporting purpose.</p> <p>For another identifier The format of proprietary ID for each scheme name:</p> <p>SWIFTBIC: varchar(11) UniqueBusinessIdentifier: varchar(72) CICR: varchar(9) BRN: varchar(11) UserDefinedCode: varchar(72)</p>	✓	✓	✓	✓	✓	<p>We would like to seek guidance from HKMA on below: Reporting in event of unavailability of counterparty LEI within T+2 - With the proposed change from HKMA, LEI appears to be the only acceptable identifiers for counterparties other than natural persons. In the event counterparties LEI are not available to reporting entity within the reporting timeline (T+2), we would like to ask HKMA to consider to allow reporting entity to report other identifiers (such as SWIFT, internal identifiers) in interim, and report LEI as soon as reasonably practical after the LEI is available to the reporting entity. We would like SFC and HKMA to</p>	<p>Similar with the current practice, for Counterparty 2 who does not have an LEI, reporting entities are allowed to report the identifier of Counterparty 2 according to a waterfall list of identifiers, namely: - SWIFTBIC - Unique Business Identifier (which was implemented by the Company Registry and has replaced the number of Certificate of Incorporation, number of Certificate of Registration and Business Registration number) - Certificate of Incorporation / Certificate of Registration number - Business Registration number - User Defined Code (or internal client code)</p> <p>We have added the relevant allowable values.</p>	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
									<p>consider aligning expectation on the renewed status of counterparty 2 LEI with other global regulators.</p> <p>Similar guidance from MAS for reference: Where "Counterparty 2" is a specified person, to use LEI or pre-LEI if LEI is not available. Where "Counterparty 2" is not a specified person, to use LEI or pre-LEI if LEI is not available or, if "Counterparty 2" does not have any LEI or pre-LEI, to use SWIFT BIC code, AVOX ID, any identifier issued by a licensed trade repository or licensed foreign trade repository, or client code. In the case of individuals, to use a client code.</p>		

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
7A	Counterparty 2 name	If the identifier reported for Counterparty 2 is not an LEI, or SWIFTBIC, the legal name of Counterparty 2.	Varchar(105) Up to 105 alphanumeric characters.	✓	✓	✓	✓	✓	-	As a result of allowing a waterfall of identifiers in the absence of an LEI for Counterparty 2 (row #7 above) and for the purpose of data aggregation, we will need to add a new data field "Counterparty 2 name" (row #7A) to identify the name of Counterparty 2 if the identifier is not LEI or SWIFTBIC.	To be mandated
8	Counterparty 2 identifier type indicator	Indicator of whether LEI was used to identify the Counterparty 2.	Boolean: true, for Legal entities false, for natural persons who are acting as private individuals (not eligible for an LEI per the ROC Statement - Individuals Acting in a Business Capacity)	✓	✓	✓	✓	✓			To be mandated
9	Direction 1	Indicator of whether the counterparty 1 is the buyer or the seller as determined at the time of the transaction, if applicable.	Char(4)  Allowable values: BYER = buyer SLLR = seller	✓	✓	✓	✓	✓			To be mandated
10	Direction 2 - Leg 1	Indicator of whether the counterparty 1 is the payer or the receiver of leg 1 as determined at the time of the conclusion of the derivative, if applicable.	Char(4)  Allowable values: MAKE = payer TAKE = receiver	✓	✓	✓	✓	✓			To be mandated
11	Direction 2 - Leg 2	Indicator of whether the counterparty 1 is the payer or the receiver of leg 2 as determined at the time of the conclusion of the derivative, if applicable.	Char(4)  Allowable values: MAKE = payer TAKE = receiver	✓	✓	✓	✓	✓			To be mandated



Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
12	Cleared	Indicator of whether the transaction has been cleared, or is intended to be cleared, by a central counterparty.	Char(1)  Allowable values: Y= yes, centrally cleared, for beta and gamma transactions. N= no, not centrally cleared. I= intent to clear, for alpha transactions that are planned to be submitted to clearing.	✓	✓	✓	✓	✓			To be mandated
13	Central counterparty	Identifier of the central counterparty that cleared the transaction, if applicable. This data element is not applicable if the value of the data element "Cleared" is "N" ("No, not centrally cleared") or "I" ("Intent to clear").	ISO 17442 Legal Entity Identifier (LEI) Char(20)  LEI code that is included in the LEI data as published by the Global LEI Foundation (GLEIF, <a href="http://www.gleif.org/">www.gleif.org/</a> ).	✓	✓	✓	✓	✓			To be mandated
14	Clearing member	Identifier of the clearing member through which a derivative transaction was cleared at a central counterparty, if applicable.  This data element is applicable to cleared transactions under both the agency clearing model and the principal clearing model. • In the case of the principal clearing model, the clearing member is identified as clearing member and also as a counterparty in both transactions resulting from clearing: (i) in the transaction between the central counterparty and the clearing member; and (ii) in the transaction	ISO 17442 Legal Entity Identifier (LEI) Char(20)  LEI code that is included in the LEI data as published by the Global LEI Foundation (GLEIF, <a href="http://www.gleif.org/">www.gleif.org/</a> ).	✓	✓	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		<p>between the clearing member and the counterparty to the original alpha transaction.</p> <ul style="list-style-type: none"> <li>In the case of the agency clearing model, the clearing member is identified as clearing member but not as the counterparty to transactions resulting from clearing. Under this model, the counterparties are the central counterparty and the client.</li> </ul> <p>This data element is not applicable if the value of the data element "Cleared" is "N" ("No, not centrally cleared") or "I" ("Intent to clear").</p>									
15	Platform identifier	<p>Identifier of the trading facility (eg exchange, multilateral trading facility, swap execution facility) on which the transaction was executed, if applicable.</p>	<p>ISO 10383 Segment Market Identifier Code (MIC) Char(4)</p> <p>Allowable values: ISO 10383 segment MIC code. If no trading facility was involved in the transaction: XOFF, for transactions in listed instruments XXXX, for transactions in instruments that are not listed in any venue BILT, if the reporting counterparty cannot determine whether the instrument is listed or not, as per jurisdictional requirements.</p>	✓	✓	✓	✓	✓	<p><b>Comment (i)</b> In absence of a list of trading facilities published by HKMA, we would like to seek HKMA guidance on whether taking foreign jurisdictions' list (such as ESMA) of trading facilities as reference be an acceptable approach to determine whether "XXXX", "XOFF", or "BILT"</p>	<p>As set out in the "Format and allowable values" column, ISO 10383 Segment MIC is the list of trading facilities for populating this data field. If a trade is not executed on any of the trading platforms in the ISO 10383 Segment MIC, reporting entities may regard it as "no trading facility was involved" and populate "XXXX", "XOFF", "XXXX" or "BILT" accordingly.</p> <p>If a trade is executed over phone, reporting entities may regard it as "no</p>	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
									<p>should be used when no trading facility was involved in the transaction.</p> <p><b>Comment (ii)</b> Is this a conditional field? (What if the trade is executed over the phone / through Reuters or Bloomberg, how should this field be populated?)</p>	<p>trading facility was involved" and populate "XXXX", "XOFF", "XXXX" or "BILT" accordingly.</p> <p>If a trade is executed on "Reuters or Bloomberg", reporting entities should check whether such platform is on the list of the ISO 10383 Segment MIC.</p>	
16	Confirmed	For new reportable transactions (as defined by the CPMI-IOSCO Technical Guidance: Harmonisation of the Unique Transaction Identifier), whether the Legally binding terms of an OTC derivatives contract were documented and agreed upon (confirmed) or not (unconfirmed). If documented and agreed, whether such confirmation was done: <ul style="list-style-type: none"> <li>• via a shared confirmation facility or platform, or a private/bilateral electronic system (electronic);</li> <li>• via a human-readable written document, such</li> </ul>	ISO 20022: SecuritiesTradeStatus/TradeConfirmationStatus Char(4) NCNF = unconfirmed ECNF = electronic YCNF = non-electronic	✓	✓	✓	✓	✓	How should this field be populated if SWIFT confirmation is adopted? (e.g. MT300, MT305)	Please report ECNF if SWIFT confirmation is adopted.	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		as fax, paper or manually processed e-mails (non- electronic).									
17	Final contractual settlement date	<p>Unadjusted date as per the contract, by which all transfer of cash or assets should take place and the counterparties should no longer have any outstanding obligations to each other under that contract, if applicable.</p> <p>For products that may not have a final contractual settlement date (eg American options), this data element reflects the date by which the transfer of cash or asset would take place if termination were to occur on the expiration date.</p>	ISO 8601 YYYY-MM-DD, based on UTC.	✓	✓	✓	✓	✓	Under certain circumstances (e.g. SOFR IRS with payment delay) in which the final settlement occurs after the maturity date, is it acceptable to report the maturity date as the "final contractual settlement date" to relieve potential technological burden?	There is no restriction to populate the "Final contractual settlement date" as a date chronologically after the maturity date. Reporting entities should populate the correct final contractual settlement date.	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
18	Settlement currency - Leg 1	Currency for the cash settlement of the transaction when applicable. For multicurrency products that do not net, the settlement currency of the leg 1. This data element is not applicable for physically settled products (eg physically settled swaptions).	ISO 4217  Char(3)  Allowable values: Currencies included in ISO 4217	✓	✓	✓	✓	✓			To be mandated
19	Settlement currency - Leg 2	Currency for the cash settlement of the transaction when applicable. For multicurrency products that do not net, the settlement currency of the leg 2. This data element is not applicable for physically settled products (eg physically settled swaptions).	ISO 4217  Char(3)  Allowable values: Currencies included in ISO 4217	✓	✓	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
20	Settlement location	Place of settlement of the transaction as stipulated in the contract, if applicable. This data element is only applicable for transactions that involve an offshore currency (i.e. a currency which is not included in the ISO 4217 currency list, for example CNH).	ISO 3166 Char(2) ISO country code	✓	✓	✓	✓	✓	<p><b>Comment (i)</b> This data element is not adopted by other APAC regional regulators (ASIC and MAS), therefore building operational capabilities specifically for HKMA requirements will increase cost of compliance for reporting entities. We would like HKMA to consider excluding this data element to enable harmonization as much as possible.</p> <p><b>Comment (ii)</b> We note that there is currently no direct flag in system/WSS to indicate this information. We would appreciate if the HKMA could consider making the reporting of such additional fields optional so that the industry could be provided with more flexibility, which</p>	<p>"Settlement location" is a data field published in the CDE Technical Guidance and we understand that CFTC also mandates this data field. The purpose of this data field is mainly for populating offshore renminbi (i.e. CNH) which does not have a code in the ISO 4217 currency code. As information on offshore renminbi trading is important to the Hong Kong capital market, we take the view that this data field should be mandated.</p> <p>An updated AIDG with detailed format and technical specifications of the data fields will be issued in due course.</p>	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
									would also alleviate operational burden. In addition, we would appreciate if a more detailed description of data fields could be provided (in a format like existing AIDG Supplementary Reporting Instructions SRI); with the new fields clearly marked alongside the original fields to be shown together in Appendix B.		

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
21	Fixed rate day count convention - Leg 1	Where applicable: day count convention of leg 1 (often also referred to as day count fraction or day count basis or day count method) that determines how interest payments are calculated. It is used to compute the year fraction of the calculation period, and indicates the number of days in the calculation period divided by the number of days in the year.	ISO 20022: Interest Calculation/Day Count Basis Char(4)  Allowable values: A001 = IC30360ISDAor30360AmericanBasicRule A002 = IC30365 A003 = IC30Actual A004 = Actual360 A005 = Actual365Fixed A006 = ActualActualICMA A007 = IC30E360orEuroBondBasismodel1 A008 = ActualActualISDA A009 = Actual365LorActuActubasisRule A010 = ActualActualAFB A011 = IC30360ICMAor30360basicrule A012 = IC30E2360orEurobondbasismodel2 A013 = IC30E3360orEurobondbasismodel3 A014 = Actual365NL A015 = ActualActualUltimo A016 = IC30EPlus360 A017 = Actual364 A018 = Business252 A019 = Actual360NL A020 = 1/1 NARR = Narrative	✓	x	✓	✓	✓			To be mandated



Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
22	Floating rate day count convention - Leg 1	Where applicable: day count convention (often also referred to as day count fraction or day count basis or day count method) that determines how interest payments for the floating rate of leg 1 are calculated. It is used to compute the year fraction of the calculation period, and indicates the number of days in the calculation period divided by the number of days in the year.	ISO 20022: Interest Calculation/Day Count Basis Char(4)  Allowable values: A001 = IC30360ISDAor30360AmericanBasicRule A002 = IC30365 A003 = IC30Actual A004 = Actual360 A005 = Actual365Fixed A006 = ActualActualICMA A007 = IC30E360orEuroBondBasismodel1 A008 = ActualActualISDA A009 = Actual365LorActuActubasisRule A010 = ActualActualAFB A011 = IC30360ICMAor30360basicrule A012 = IC30E2360orEurobondbasismodel2 A013 = IC30E3360orEurobondbasismodel3 A014 = Actual365NL A015 = ActualActualUltimo A016 = IC30EPlus360 A017 = Actual364 A018 = Business252 A019 = Actual360NL A020 = 1/1 NARR = Narrative	✓	x	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
23	Fixed rate day count convention - Leg 2	Where applicable: day count convention of leg 2 (often also referred to as day count fraction or day count basis or day count method) that determines how interest payments are calculated. It is used to compute the year fraction of the calculation period, and indicates the number of days in the calculation period divided by the number of days in the year.	ISO 20022: Interest Calculation/Day Count Basis Char(4)  Allowable values: A001 = IC30360ISDAor30360AmericanBasicRule A002 = IC30365 A003 = IC30Actual A004 = Actual360 A005 = Actual365Fixed A006 = ActualActualICMA A007 = IC30E360orEuroBondBasismodel1 A008 = ActualActualISDA A009 = Actual365LorActuActubasisRule A010 = ActualActualAFB A011 = IC30360ICMAor30360basicrule A012 = IC30E2360orEurobondbasismodel2 A013 = IC30E3360orEurobondbasismodel3 A014 = Actual365NL A015 = ActualActualUltimo A016 = IC30EPlus360 A017 = Actual364 A018 = Business252 A019 = Actual360NL A020 = 1/1 NARR = Narrative	✓	x	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
24	Floating rate day count convention - Leg 2	Where applicable: day count convention (often also referred to as day count fraction or day count basis or day count method) that determines how interest payments for the floating rate of leg 2 are calculated. It is used to compute the year fraction of the calculation period, and indicates the number of days in the calculation period divided by the number of days in the year.	ISO 20022: Interest Calculation/Day Count Basis Char(4)  Allowable values: A001 = IC30360ISDAor30360AmericanBasicRule A002 = IC30365 A003 = IC30Actual A004 = Actual360 A005 = Actual365Fixed A006 = ActualActualICMA A007 = IC30E360orEuroBondBasismodel1 A008 = ActualActualISDA A009 = Actual365LorActuActubasisRule A010 = ActualActualAFB A011 = IC30360ICMAor30360basicrule A012 = IC30E2360orEurobondbasismodel2 A013 = IC30E3360orEurobondbasismodel3 A014 = Actual365NL A015 = ActualActualUltimo A016 = IC30EPlus360 A017 = Actual364 A018 = Business252 A019 = Actual360NL A020 = 1/1 NARR = Narrative	✓	x	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
25	Fixed rate payment frequency period - Leg 1	Where applicable: time unit associated with the frequency of payments, eg day, week, month, year or term of the stream for the fixed rate of leg 1.	ISO 20022: InterestCalculation/PaymentFrequency Char(4)  Allowable values: DAIL = daily WEEK = weekly MNTH = monthly YEAR = yearly ADHO = ad hoc which applies when payments are irregular EXPI = payment at term	✓	x	✓	✓	✓			To be mandated
26	Floating rate payment frequency period - Leg 1	Where applicable: time unit associated with the frequency of payments, eg day, week, month, year or term of the stream for the floating rate of leg 1.	ISO 20022: InterestCalculation/PaymentFrequency Char(4)  Allowable values: DAIL = daily WEEK = weekly MNTH = monthly YEAR = yearly ADHO = ad hoc which applies when payments are irregular EXPI = payment at term	✓	x	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
27	Fixed rate payment frequency period - <del>Leg 1</del> Leg 2	Where applicable: time unit associated with the frequency of payments, eg day, week, month, year or term of the stream for the fixed rate of leg 2.	ISO 20022: InterestCalculation/PaymentFrequency Char(4)  Allowable values: DAIL = daily WEEK = weekly MNTH = monthly YEAR = yearly ADHO = ad hoc which applies when payments are irregular EXPI = payment at term	✓	x	✓	✓	✓		There is a typo in the Data Element Name.	To be mandated
28	Floating rate payment frequency period - Leg 2	Where applicable: time unit associated with the frequency of payments, eg day, week, month, year or term of the stream for the floating rate of leg 2.	ISO 20022: InterestCalculation/PaymentFrequency Char(4)  Allowable values: DAIL = daily WEEK = weekly MNTH = monthly YEAR = yearly ADHO = ad hoc which applies when payments are irregular EXPI = payment at term	✓	x	✓	✓	✓			To be mandated
29	Fixed rate payment frequency period multiplier - Leg 1	Where applicable: number of time units (as expressed by the payment frequency period) that determines the frequency at which periodic payment dates occur for the fixed rate of leg 1. For example, a transaction with payments occurring every two months is	Num(3,0) Any value greater than or equal to zero.	✓	x	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		represented with a payment frequency period of "MNTH" (monthly) and a payment frequency period multiplier of 2. This data element is not applicable if the payment frequency period is "ADHO". If payment frequency period is "EXPI", then the payment frequency period multiplier is 1. If the payment frequency is intraday, then the payment frequency period is "DAIL" and the payment frequency multiplier is 0.									
30	Floating rate payment frequency period multiplier - Leg 1	Where applicable: number of time units (as expressed by the payment frequency period) that determines the frequency at which periodic payment dates occur for the floating rate of leg 1. For example, a transaction with payments occurring every two months is represented with a payment frequency period of "MNTH" (monthly) and a payment frequency period multiplier of 2. This data element is not applicable if the payment frequency period is "ADHO". If payment frequency period is "EXPI", then the	Num(3,0) Any value greater than or equal to zero.	✓	x	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		payment frequency period multiplier is 1. If the payment frequency is intraday, then the payment frequency period is "DAIL" and the payment frequency multiplier is 0.									
31	Fixed rate payment frequency period multiplier - Leg 2	Where applicable: number of time units (as expressed by the payment frequency period) that determines the frequency at which periodic payment dates occur for the fixed rate of leg 2. For example, a transaction with payments occurring every two months is represented with a payment frequency period of "MNTH" (monthly) and a payment frequency period multiplier of 2. This data element is not applicable if the payment frequency period is "ADHO". If payment frequency period is "EXPI", then the payment frequency period multiplier is 1. If the payment frequency is intraday, then the payment frequency period is "DAIL" and the payment frequency multiplier is 0.	Num(3,0) Any value greater than or equal to zero.	✓	x	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
32	Floating rate payment frequency period multiplier - Leg 2	Where applicable: number of time units (as expressed by the payment frequency period) that determines the frequency at which periodic payment dates occur for the floating rate of leg 2. For example, a transaction with payments occurring every two months is represented with a payment frequency period of "MNTH" (monthly) and a payment frequency period multiplier of 2. This data element is not applicable if the payment frequency period is "ADHO". If payment frequency period is "EXPI", then the payment frequency period multiplier is 1. If the payment frequency is intraday, then the payment frequency period is "DAIL" and the payment frequency multiplier is 0.	Num(3,0) Any value greater than or equal to zero.	✓	x	✓	✓	✓			To be mandated
33	Valuation amount	Current value of the outstanding contract, without applying any valuation adjustments (i.e. any XVA adjustment such as CVA, DVA, etc).  Valuation amount is expressed as the exit cost of the contract or components of the contract, i.e. the price	Num(25,5) Any value.	✓	✓	✓	✓	✓			To be mandated



Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		that would be received to sell the contract (in the market in an orderly transaction at the valuation date).									
34	Valuation currency	Currency in which the valuation amount is denominated.	ISO 4217 Char(3) Allowable values: Currencies included in ISO 4217	✓	✓	✓	✓	✓			To be mandated
35	Valuation timestamp	Date and time of the last valuation marked to market, provided by the central counterparty or calculated using the current or last available market price of the inputs. If for example a currency exchange rate is the basis for a transaction's valuation, then the valuation timestamp reflects the moment in time that exchange rate was current.	ISO 8601 YYYY-MM-DDThh:mm:ssZ, based on UTC.	✓	✓	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
36	Valuation method	Source and method used for the valuation of the transaction by the reporting counterparty. If at least one valuation input is used that is classified as mark-to-model in the below table, then the whole valuation is classified as mark-to-model. If only inputs are used that are classified as mark-to-market in the table below, then the whole valuation is classified as mark-to-market.	Char(4)  Allowable values: MTMA = mark-to-market MTMO = mark-to-model CCPV = central counterparty's valuation	✓	✓	✓	✓	✓	Other APAC jurisdictions (ASIC & MAS) do not make CCP valuation mandatory for cleared transactions but rather leave it as one of the allowable valuation method. We would like HKMA to consider aligning this with other APAC regulators.	There are still ongoing international discussions on how CCP-cleared trades should be valued at the moment. We will take into account the respondent's feedback and closely monitor international developments. Further guidance in the SRI will be provided .	To be mandated
37	Collateral portfolio indicator	Indicator of whether the collateralisation was performed on a portfolio basis, if applicable. By "on a portfolio basis", it is meant a set of transactions that are margined together (either on a net or a gross basis) contrary to the scenario where the margin is calculated and posted for each individual transaction separately.	Boolean  Allowable values: true, if collateralised on a portfolio basis false, if not part of a portfolio	✓	✓	✓	✓	✓	If there is no collateral arrangement for a particular transaction, how should this field be populated? (e.g. left blank?)	In an ISO XML message, this is a derived field, i.e. the true or false value for this data element is inferred from (i) the presence (true) of a IM or VM collateral code or (ii) the value of NOAP "not applicable" (false) reported for a IM or VM collateral code for the transaction where no collateral arrangement has been made, including cases where the transaction is not collateralised in a portfolio or not collateralised at all.	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
38	Collateral portfolio code	If collateral is reported on a portfolio basis, unique code assigned by the reporting counterparty to the portfolio, if applicable. This data element is not applicable if the collateralisation was performed on a transaction level basis, or if there is no collateral agreement or if no collateral is posted or received.	ISO-20022 Portfolio/Identification Varchar(52) Up to 52 alphanumeric characters.	✓	✓	✓	✓	✓	<p><b>Comment (i)</b> We notice that the proposal includes both Collateral Portfolio Code and a pair of IM / VM Portfolio Codes. From globally and regionally, it is either Collateral Portfolio Code (EU-EMIR and UK-EMIRE) or the pair of the IM / VM Portfolio Codes (CFTC, ASIC, MAS, JFSA), but not both. We believe that the HKMA and the SFC should review and implement either one but not both.</p> <p><b>Comment (ii)</b> We would like to seek clarification from HKMA on the usage of this data element as portfolio codes for IM and VM would already be reported in #156 and #158. For practicality consideration, it might complicate the validation logic by HKTR (or</p>	We agree with the respondents' feedback and will not mandate "Collateral portfolio code". We will provide further guidance in the SRI on using "Initial Margin collateral portfolio code" (#156) and "Variation margin collateral portfolio code" (#158) to populate a collateral portfolio which does not distinguish between initial margin and variation margin.	To be removed

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
									DTCC if applicable) with both data element #38, #156, #158 being mandated, for example if we report IM & VM portfolio codes under #156 and #158 while we leave #38 as blank, we are not sure if there will be logic which incorrectly recognize the transaction as uncollateralised. Propose to remove and for reporting entities to report IM and VM portfolio codes.		

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
39	Initial margin posted by the counterparty 1 (pre-haircut)	<p>Monetary value of initial margin that has been posted by the reporting counterparty, including any margin that is in transit and pending settlement unless inclusion of such margin is not allowed under the jurisdictional requirements, if applicable.</p> <p>If the collateralisation is performed at portfolio level, the initial margin posted relates to the whole portfolio; if the collateralisation is performed for single transactions, the initial margin posted relates to such single transaction.</p> <p>This refers to the total current value of the initial margin, rather than to its daily change. The data element refers both to uncleared and centrally cleared transactions.</p> <p>For centrally cleared transactions, the data element does not include default fund contributions, nor collateral posted against liquidity provisions to the central counterparty, i.e. committed credit lines.</p> <p>If the initial margin posted is denominated in</p>	<p>ISO 20022: MarginCall/InitialMargin Num(25,5)</p> <p>Any value greater than or equal to zero.</p>	✓	✓	✓	✓	✓	<p>1. Do we need to revalue the IM posted / received on a daily basis?</p> <p>2. How does the haircut of collateral apply? (Any examples to illustrate the difference between pre-haircut and post-haircut)</p> <p>3. We would like to present items 39-41 in terms of the base currency of IM stated in the relevant IM agreements.</p>	<p>Revaluation of IM posted / received should be carried out according to the relevant margin requirements. We will provide further guidance in the SRI on updating collateral value.</p> <p>Haircut of collateral should apply according to the relevant margin requirements.</p> <p>HKTR supports the ISO 4217 currency list. Please refer to the definition of the data fields for the currency to be adopted.</p>	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		more than one currency, those amounts are converted into a single currency chosen by the reporting counterparty and reported as one total value.									

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
40	Initial margin posted by the counterparty 1 (post-haircut)	<p>Monetary value of initial margin that has been posted by the reporting counterparty, including any margin that is in transit and pending settlement unless inclusion of such margin is not allowed under the jurisdictional requirements, if applicable.</p> <p>If the collateralisation is performed at portfolio level, the initial margin posted relates to the whole portfolio; if the collateralisation is performed for single transactions, the initial margin posted relates to such single transaction.</p> <p>This refers to the total current value of the initial margin after application of the haircut (if applicable), rather than to its daily change.</p> <p>The data element refers both to uncleared and centrally cleared transactions. For centrally cleared transactions, the data element does not include default fund contributions, nor collateral posted against liquidity provisions to the central counterparty, i.e. committed credit lines.</p>	ISO 20022: MarginCall/InitialMargin Num(25,5) Any value greater than or equal to zero.	✓	✓	✓	✓	✓	We would like to present items 39-41 in terms of the base currency of IM stated in the relevant IM agreements.	HKTR supports the ISO 4217 currency list. Please refer to the definition of the data fields for the currency to be adopted.	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		If the initial margin posted is denominated in more than one currency, those amounts are converted into a single currency chosen by the reporting counterparty and reported as one total value.									
41	Currency of initial margin posted	Currency in which the initial margin posted is denominated, if applicable. If the initial margin posted is denominated in more than one currency, this data element reflects one of those currencies into which the reporting counterparty has chosen to convert all the values of posted initial margins.	ISO 4217 Char(3)  Allowable values: Currencies included in ISO 4217	✓	✓	✓	✓	✓	We would like to present items 39-41 in terms of the base currency of IM stated in the relevant IM agreements.	HKTR supports the ISO 4217 currency list. Please refer to the definition of the data fields for the currency to be adopted.	To be mandated



Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
42	Initial margin collected by the counterparty 1 (pre-haircut)	<p>Monetary value of initial margin that has been collected by the reporting counterparty, including any margin that is in transit and pending settlement unless inclusion of such margin is not allowed under the jurisdictional requirements, if applicable.</p> <p>If the collateralisation is performed at portfolio level, the initial margin collected relates to the whole portfolio; if the collateralisation is performed for single transactions, the initial margin collected relates to such single transaction.</p> <p>This refers to the total current value of the initial margin, rather than to its daily change. The data element refers both to uncleared and centrally cleared transactions. For centrally cleared transactions, the data element does not include collateral collected by the central counterparty as part of its investment activity.</p> <p>If the initial margin collected is denominated in more than one currency, those amounts</p>	ISO 20022: MarginCall/InitialMargin Num(25,5) Any value greater than or equal to zero.	✓	✓	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		are converted into a single currency chosen by the reporting counterparty and reported as one total value.									
43	Initial margin collected by the counterparty 1 (post-haircut)	Monetary value of initial margin that has been collected by the reporting counterparty, including any margin that is in transit and pending settlement unless inclusion of such margin is not allowed under the jurisdictional requirements. If the collateralisation is performed at portfolio level, the initial margin collected relates to the whole portfolio; if the collateralisation is performed for single transactions, the initial margin collected relates to such single transaction.	ISO 20022: MarginCall/InitialMargin Num(25,5) Any value greater than or equal to zero.	✓	✓	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		<p>This refers to the total current value of the initial margin after application of the haircut (if applicable), rather than to its daily change. The data element refers both to uncleared and centrally cleared transactions. For centrally cleared transactions, the data element does not include collateral collected by the central counterparty as part of its investment activity.</p> <p>If the initial margin collected is denominated in more than one currency, those amounts are converted into a single currency chosen by the reporting counterparty and reported as one total value.</p>									
44	Currency of initial margin collected	<p>Currency in which the initial margin collected is denominated, if applicable.</p> <p>If the initial margin collected is denominated in more than one currency, this data element reflects one of those currencies into which the reporting counterparty has chosen to convert all the values of collected initial margins.</p>	<p>ISO 4217</p> <p>Char(3)</p> <p>Allowable values: Currencies included in ISO 4217</p>	✓	✓	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
45	Variation margin posted by the counterparty 1 (pre-haircut)	<p>Monetary value of the variation margin posted by the reporting counterparty (including the cash-settled one), and including any margin that is in transit and pending settlement unless inclusion of such margin is not allowed under the jurisdictional requirements, if applicable.</p> <p>Contingent variation margin is not included.</p> <p>If the collateralisation is performed at portfolio level, the variation margin posted relates to the whole portfolio; if the collateralisation is performed for single transactions, the variation margin posted relates to such single transaction.</p> <p>This data element refers to the total current value of the variation margin, cumulated since the first reporting of variation margins posted for the portfolio/transaction.</p> <p>If the variation margin posted is denominated in more than one currency, those amounts are converted into a single currency chosen by the reporting counterparty</p>	ISO 20022: MarginCall/VariationMargin Num(25,5) Any value greater than or equal to zero.	✓	✓	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		and reported as one total value.									

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
46	Variation margin posted by the counterparty 1 (post-haircut)	<p>Monetary value of the variation margin posted by the reporting counterparty (including the cash-settled one), and including any margin that is in transit and pending settlement unless inclusion of such margin is not allowed under the jurisdictional requirements, if applicable.</p> <p>Contingent variation margin is not included. If the collateralisation is performed at portfolio level, the variation margin posted relates to the whole portfolio; if the collateralisation is performed for single transactions, the variation margin posted relates to such single transaction.</p> <p>This data element refers to the total current value of the variation margin after application of the haircut (if applicable), cumulated since the first reporting of posted variation margins for the portfolio/transaction.</p> <p>If the variation margin posted is denominated in more than one currency, those amounts are converted into a single currency chosen by the</p>	ISO 20022: MarginCall/VariationMargin Num(25,5) Any value greater than or equal to zero.	✓	✓	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		reporting counterparty and reported as one total value.									
47	Currency of variation margin posted	<p>Currency in which the variation margin posted is denominated, if applicable.</p> <p>If the variation margin posted is denominated in more than one currency, this data element reflects one of those currencies into which the reporting counterparty has chosen to convert all the values of posted variation margins.</p>	<p>ISO 4217</p> <p>Char(3)</p> <p>Allowable values: Currencies included in ISO 4217</p>	✓	✓	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
48	Variation margin collected by the counterparty 1 (pre-haircut)	<p>Monetary value of the variation margin collected by the reporting counterparty (including the cash- settled one), and including any margin that is in transit and pending settlement unless inclusion of such margin is not allowed under the jurisdictional requirements, if applicable.</p> <p>Contingent variation margin is not included.</p> <p>If the collateralisation is performed at portfolio level, the variation margin collected relates to the whole portfolio; if the collateralisation is performed for single transactions, the variation margin collected relates to such single transaction.</p> <p>This refers to the total current value of the variation margin, cumulated since the first reporting of collected variation margins for the portfolio/transaction.</p> <p>If the variation margin collected is denominated in more than one currency, those amounts are converted into a single currency chosen by the reporting</p>	<p>ISO 20022: MarginCall/VariationMargin Num(25,5)</p> <p>Any value greater than or equal to zero.</p>	✓	✓	✓	✓	✓			To be mandated



Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		counterparty and reported as one total value.									

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
49	Variation margin collected by the counterparty 1 (post-haircut)	<p>Monetary value of the variation margin collected by the reporting counterparty (including the cash- settled one), and including any margin that is in transit and pending settlement unless inclusion of such margin is not allowed under the jurisdictional requirements, if applicable.</p> <p>Contingent variation margin is not included.</p> <p>If the collateralisation is performed at portfolio level, the variation margin collected relates to the whole portfolio; if the collateralisation is performed for single transactions, the variation margin collected relates to such single transaction.</p> <p>This refers to the total current value of the variation margin collected after application of the haircut (if applicable), cumulated since the first reporting of collected variation margins for the portfolio/transaction.</p> <p>If the variation margin collected is denominated in more than one currency, those amounts</p>	<p>ISO 20022: MarginCall/VariationMargin Num(25,5)</p> <p>Any value greater than or equal to zero.</p>	✓	✓	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		are converted into a single currency chosen by the reporting counterparty and reported as one total value.									
50	Currency of variation margin collected	Currency in which the variation margin collected is denominated, if applicable. If the variation margin collected is denominated in more than one currency, this data element reflects one of those currencies into which the reporting counterparty has chosen to convert all the values of collected variation margins.	ISO 4217  Char(3)  Allowable values: Currencies included in ISO 4217	✓	✓	✓	✓	✓			To be mandated

51	Excess collateral posted by the counterparty 1	<p>Monetary value of any additional collateral posted by the reporting counterparty separate and independent from initial and variation margin. This refers to the total current value of the excess collateral before application of the haircut (if applicable), rather than to its daily change.</p> <p>Any initial or variation margin amount posted that exceeds the required initial margin or required variation margin, is reported as part of the initial margin posted or variation margin posted respectively rather than included as excess collateral posted.</p> <p>For centrally cleared transactions, excess collateral is reported only to the extent it can be assigned to a specific portfolio or transaction.</p>	<p>Num(25,5)</p> <p>Any value greater than or equal to zero.</p>	✓	✓	✓	✓	✓	<p><b>Comment (i)</b> We understand that only ESMA currently require these fields, and the industry working group could not come up with any scenarios that would meet the conditions specified for these fields. In the industry's engagements with ESMA, ESMA was also not able to provide any additional clarifications on when excess collateral is expected. Additionally, we understand that ROC may be looking to revise these fields in future versions of CDE. As such, we request SFC and HKMA to remove these fields; otherwise, we would appreciate it if SFC and HKMA could provide detailed guidance on the specific scenarios on how these fields should be reported.</p> <p><b>Comment (ii)</b> 1. Does this field refer to Independent</p>	<p>Taking into account the respondent's feedback and having re-assessed the balance between the regulators' need for this information and the reporting entities' compliance burden, we will make this data field optional.</p>	Optional
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										<p>Amount specified in bilateral CSA?</p> <p>2a. For Swap Connect business, do we need to include Participating Margin?</p> <p>2b. For Swap Connect, where we offer client-clearing services, should we report the associated margin in i) the trade facing OTCC, ii) the trade facing the client, or iii) both?</p> <p>3. For scenarios in which the reporting entity has direct membership at Central Clearing House, do we need to include Contribution Fund?</p>		
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Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
52	Currency of excess collateral posted	<p>Currency in which the excess collateral posted is denominated, if applicable.</p> <p>If the excess collateral posted is denominated in more than one currency, this data element reflects one of those currencies into which the reporting counterparty has chosen to convert all the values of posted excess collateral.</p>	<p>ISO 4217</p> <p>Char(3)</p> <p>Allowable values:</p> <p>Currencies included in ISO 4217</p>	✓	✓	✓	✓	✓	<p>We understand that only ESMA currently require these fields, and the industry working group could not come up with any scenarios that would meet the conditions specified for these fields. In the industry's engagements with ESMA, ESMA was also not able to provide any additional clarifications on when excess collateral is expected. Additionally, we understand that ROC may be looking to revise these fields in future versions of CDE. As such, we request SFC and HKMA to remove these fields; otherwise, we would appreciate it if SFC and HKMA could provide detailed guidance on the specific scenarios on how these fields</p>	<p>Taking into account the respondent's feedback and having re-assessed the balance between the regulators' need for this information and the reporting entities' compliance burden, we will make this data field optional.</p>	Optional

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
									should be reported.		

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
53	Excess collateral collected by the counterparty-1	<p>Monetary value of any additional collateral collected by the reporting counterparty separate and independent from initial and variation margin. This data element refers to the total current value of the excess collateral before application of the haircut (if applicable), rather than to its daily change.</p> <p>Any initial or variation margin amount collected that exceeds the required initial margin or required variation margin, is reported as part of the initial margin collected or variation margin collected respectively, rather than included as excess collateral collected.</p> <p>For centrally cleared transactions excess collateral is reported only to the extent it can be assigned to a specific portfolio or transaction.</p>	Num(25,5) Any value greater than or equal to zero.	✓	✓	✓	✓	✓	<p><b>Comment (i)</b></p> <p>We understand that only ESMA currently require these fields, and the industry working group could not come up with any scenarios that would meet the conditions specified for these fields. In the industry's engagements with ESMA, ESMA was also not able to provide any additional clarifications on when excess collateral is expected. Additionally, we understand that ROC may be looking to revise these fields in future versions of CDE. As such, we request SFC and HKMA to remove these fields; otherwise, we would appreciate it if SFC and HKMA could provide detailed guidance on the specific scenarios on how these fields</p>	<p>Taking into account the respondents' feedback and having re-assessed the balance between the regulators' need for this information and the reporting entities' compliance burden, we will make this data field optional.</p>	Optional



Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
									<p>should be reported.</p> <p><b>Comment (ii)</b>  We would appreciate if the HKMA could consider making the reporting of such additional fields optional so that the industry could be provided with more flexibility, which would also alleviate operational burden.  In addition, we would appreciate if a more detailed description of data fields could be provided (in a format like existing AIDG Supplementary Reporting Instructions SRI); with the new fields clearly marked alongside the original fields to be shown together in Appendix B.</p>		

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
54	Currency of excess collateral collected	<p>Currency in which the excess collateral collected is denominated, if applicable.</p> <p>If the excess collateral is denominated in more than one currency, this data element reflects one of those currencies into which the reporting counterparty has chosen to convert all the values of collected excess collateral.</p>	<p>ISO 4217</p> <p>Char(3)</p> <p>Allowable values: Currencies included in ISO 4217</p>	✓	✓	✓	✓	✓	<p>We understand that only ESMA currently require these fields, and the industry working group could not come up with any scenarios that would meet the conditions specified for these fields. In the industry's engagements with ESMA, ESMA was also not able to provide any additional clarifications on when excess collateral is expected. Additionally, we understand that ROC may be looking to revise these fields in future versions of CDE. As such, we request SFC and HKMA to remove these fields; otherwise, we would appreciate it if SFC and HKMA could provide detailed guidance on the specific scenarios on how these fields</p>	<p>Taking into account the respondent's feedback and having re-assessed the balance between the regulators' need for this information and the reporting entities' compliance burden, we will make this data field optional.</p>	Optional

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
									should be reported.		

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
55	Collateralisation category	Indicator of whether a collateral agreement (or collateral agreements) between the counterparties exists (uncollateralised/partially collateralised/one-way collateralised/fully collateralised), if applicable. This data element is provided for each transaction or each portfolio, depending on whether the collateralisation is performed at the transaction or portfolio level, and is applicable to both cleared and uncleared transactions.	Char(4)  Allowable values: UNCL = Uncollateralised <i>There is no collateral agreement between the counterparties or the collateral agreement(s) between the counterparties stipulates that no collateral (neither initial margin nor variation margin) has to be posted with respect to the derivative transaction.</i>  PRC1 = Partially collateralised: Counterparty 1 only <i>The collateral agreement(s) between the counterparties stipulates that the reporting counterparty regularly posts only variation margin and that the other counterparty does not post any margin with respect to the derivative transaction.</i>  PRC2 = Partially collateralised: Counterparty 2 only <i>The collateral agreement(s) between the counterparties stipulates that the other counterparty regularly posts only variation margin and that the reporting counterparty does not post any margin with respect to the derivative transaction.</i>  PRCL = Partially collateralised <i>The collateral agreement(s) between the counterparties stipulates that both counterparties regularly post only variation margin with respect to the derivative transaction.</i>  OWC1 = One-way collateralised: Counterparty 1 only <i>The collateral agreement(s) between the counterparties stipulates that the reporting counterparty posts the initial margin and regularly posts variation margin and that the other counterparty does not post any margin with respect to the derivative transaction.</i>	✓	✓	✓	✓	✓	Under the current market model in which a CCP or clearing broker is involved, VM exchange is generally bilateral but IM is uni-directional (i.e. the CCP / clearing broker is always collecting the IM), how should we populate this field?	Reporting entities should populate the best fit value according to the definition, format, and allowable values of the data element. We will provide further guidance in the SRI on how collateral should be reported.	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
			<p>OWC2 = One-way collateralised: Counterparty 2 only  <i>The collateral agreement(s) between the counterparties stipulates that the other counterparty posts the initial margin and regularly posts variation margin and that the reporting counterparty does not post any margin with respect to the derivative transaction.</i></p> <p>OWP1 = One-way/partially collateralised: Counterparty 1  <i>The collateral agreement(s) between the counterparties stipulates that the reporting counterparty posts the initial margin and regularly posts variation margin and that the other counterparty regularly posts only variation margin.</i></p> <p>OWP2 = One- way/partially collateralised: Counterparty 2  <i>The collateral agreement(s) between the counterparties stipulates that the other counterparty posts the initial margin and regularly posts variation margin and that the reporting counterparty regularly posts only variation margin.</i></p> <p>FLCL = Fully collateralised  <i>The collateral agreement(s) between the counterparties stipulates that both counterparties post initial margin and regularly post variation margin with respect to the derivative transaction.</i></p>								

56	Price	<p>Price specified in the OTC derivative transaction, if applicable. It does not include fees, taxes or commissions, if applicable.</p> <p>For commodity fixed/float swaps and similar products with periodic payments, this data element refers to the fixed price of the fixed Leg(s).</p> <p>For commodity and equity forwards and similar products, this data element refers to the forward price of the underlying or reference asset.</p> <p>For equity swaps, portfolios swaps, and similar products, this data element refers to the initial price of the underlying or reference asset.</p> <p>For contracts for difference and similar products, this data element refers to the initial price of the underlier.</p> <p>This data element is not applicable to:</p> <ul style="list-style-type: none"> <li>• Interest rate swaps and forward rate agreements, as it is understood that the information included in the data elements Fixed rate and Spread may be interpreted as the price of the transaction.</li> <li>• Interest rate options and interest rate</li> </ul>	<p>ISO 20022: Price/Amount</p> <p>Num(18,13), if Price notation = 1 Num(11,10), if Price notation = 3</p> <p>Any value, if Price notation = 1 Any value expressed as decimal (eg 0.0257 instead of 2.57%), if Price notation = 3</p>	x	x	✓	x	✓			To be mandated
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[illegible]

[illegible]



Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
57	Price currency	Currency in which the price is denominated, if applicable. Price currency is only applicable if Price notation = 1.	ISO 4217  Char(3)  Allowable values: Currencies included in ISO 4217	x	x	✓	x	✓			To be mandated
58	Price notation	Manner in which the price is expressed, if applicable.	Char(1)  Allowable values: 1 = monetary amount 3 = decimal	x	x	✓	x	✓			To be mandated
59	Price unit of measure	Unit of measure in which the price is expressed, if applicable.	ISO 20022: Price/UnitOfMeasure Char(4)  Allowable values: ISO 20022: approved external UnitOfMeasureCode codeset	x	x	✓	x	✓			To be mandated
60	<del>Price schedule— Unadjusted effective date of the price</del>  [Price schedule — Effective date]*	Where applicable: for OTC derivative transactions with prices varying throughout the life of the transaction: Unadjusted effective date of the price.  Price schedule is only applicable if the price varies per schedule.	ISO 8601 YYYY-MM-DD, based on UTC, repeatable for each date.	x	x	✓	x	✓		We understand that a new data element name will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.  *The change in square brackets is subject to the final conclusion to version 4 of the CDE Technical Guidance.	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
61	<del>Price schedule - Unadjusted end date of the price</del>  [Price schedule - End date]*	Where applicable: for OTC derivative transactions with prices varying throughout the life of the transaction: Unadjusted end date of the price. (not applicable if the unadjusted end date of a given schedule's period is back-to-back with the unadjusted effective date of the subsequent period).  Price schedule is only applicable if the price varies per schedule.	ISO 8601 YYYY-MM-DD, based on UTC, repeatable for each date.	x	x	✓	x	✓		We understand that a new data element name will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.  *The change in square brackets is subject to the final conclusion to version 4 of the CDE Technical Guidance.	To be mandated
62	<del>Price schedule - Price in effect between the unadjusted effective date and unadjusted end date inclusive</del>  [Price schedule - Price]*	Where applicable: for OTC derivative transactions with prices varying throughout the life of the transaction: Price in effect between the unadjusted effective date and unadjusted end date inclusive.  Price schedule is only applicable if the price varies per schedule.	ISO 20022: Price/Amount  <del>Char(3) Currencies included in ISO 4217 and</del> Num(18,13), if Price notation = 1  Num(11,10), if Price notation = 3  Any value greater than zero, if Price notation = 1 Any value expressed as decimal (eg 0.0257 instead of 2.57%), if Price notation = 3  Repeatable for each price.	x	x	✓	x	✓		We understand that a new data element name will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.  *The change in square brackets is subject to the final conclusion to version 4 of the CDE Technical Guidance.	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
63	Fixed rate - Leg 1	Where applicable: for OTC derivative transactions with periodic payments, per annum rate of the fixed rate of leg 1.	ISO 20022: Interest/Rate  Num(11,10), if Fixed rate notation = 2  Positive and negative values expressed as decimal (eg 0.0257 instead of 2.57%), if Fixed rate notation = 2  <b>This data element must be reported as a decimal.</b>	✓	x	✓	✓	✓		This data field can only be populated as a decimal to align with other jurisdictions. We have added clarification to the format and allowable values.	To be mandated
64	Fixed rate - Leg 2	Where applicable: for OTC derivative transactions with periodic payments, per annum rate of the fixed rate of leg 2.	ISO 20022: Interest/Rate  Num(11,10), if Fixed rate notation = 2  Positive and negative values expressed as decimal (eg 0.0257 instead of 2.57%), if Fixed rate notation = 2  <b>This data element must be reported as a decimal.</b>	✓	x	✓	✓	✓		This data field can only be populated as a decimal to align with other jurisdictions. We have added clarification to the format and allowable values.	To be mandated
65	<del>Fixed rate notation - Leg 1</del>	<del>Where applicable: manner in which the fixed rate is expressed for leg 1</del>	<del>Char(1)  Allowable values: 2 = decimal</del>	<del>✓</del>	<del>x</del>	<del>✓</del>	<del>✓</del>	<del>✓</del>	Not adopted or not commonly by other APAC regulators. We would hence like to propose for SFC and HKMA to not require these fields to align reporting requirements with other major APAC jurisdictions.	As "Fixed rate" can only be populated as a decimal, this data field on notation is no longer required and will not be mandated.	To be removed
66	<del>Fixed rate notation - Leg 2</del>	<del>Where applicable: manner in which the fixed rate is expressed for leg 2</del>	<del>Char(1)  Allowable values: 2 = decimal</del>	<del>✓</del>	<del>x</del>	<del>✓</del>	<del>✓</del>	<del>✓</del>	Not adopted or not commonly by other APAC regulators. We would hence like to propose for SFC and HKMA to not require	As "Fixed rate" can only be populated as a decimal, this data field on notation is no longer required and will not be mandated.	To be removed

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
									these fields to align reporting requirements with other major APAC jurisdictions.		
67	Spread - Leg 1	An indication of the spread of leg 1, Where applicable: for OTC derivative transactions with periodic payments (eg interest rate fixed/float swaps, interest rate basis swaps, commodity swaps), • spread on the individual floating leg(s) index reference price, in the case where there is a spread on a floating leg(s). • difference between the reference prices of the two floating leg indexes.	ISO 20022: Spread/SpreadRate or ISO 20022: Spread/PriceOffset or ISO 20022: Spread/BasisPointSpread  Num(18,13), if Spread notation = 1 Num(11,10), if Spread notation = 3 Num(5), if Spread notation = 4  Any value, if Spread notation = 1 Any value expressed as decimal (eg 0.0257 instead of 2.57%), if Spread notation = 3 Any integer value expressed in basis points (eg 257 instead of 2.57%), if Spread notation = 4	✓	x	✓	✓	✓			To be mandated
68	Spread - Leg 2	An indication of the spread of leg 2, Where applicable: for OTC derivative transactions with periodic payments (e.g. interest rate fixed/float swaps, interest rate basis swaps, commodity swaps), • spread on the individual floating leg(s) index reference price, in the case where there is a spread on a floating leg(s). • difference between the reference prices of the two floating leg indexes.	ISO 20022: Spread/SpreadRate or ISO 20022: Spread/PriceOffset or ISO 20022: Spread/BasisPointSpread  Num(18,13), if Spread notation = 1 Num(11,10), if Spread notation = 3 Num(5), if Spread notation = 4  Any value, if Spread notation = 1 Any value expressed as decimal (eg 0.0257 instead of 2.57%), if Spread notation = 3 Any integer value expressed in basis points (eg 257 instead of 2.57%), if Spread notation = 4	✓	x	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
69	Spread currency - Leg 1	Where applicable: currency in which the spread of leg 1 is denominated. This data element is only applicable if Spread notation = 1.	ISO 4217  Char(3)  Allowable values: Currencies included in ISO 4217	✓	x	✓	✓	✓			To be mandated
70	Spread currency - Leg 2	Where applicable: currency in which the spread of leg 2 is denominated. This data element is only applicable if Spread notation = 1.	ISO 4217  Char(3)  Allowable values: Currencies included in ISO 4217	✓	x	✓	✓	✓			To be mandated
71	Spread notation - Leg 1	Where applicable: manner in which the spread is expressed for leg 1.	Char(1)  Allowable values: 1 = monetary amount 3 = decimal 4 = basis points	✓	x	✓	✓	✓			To be mandated
72	Spread notation - Leg 2	Where applicable: manner in which the spread is expressed for leg 2.	Char(1)  Allowable values: 1 = monetary amount 3 = decimal 4 = basis points	✓	x	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
73	Strike price	Where applicable: • For options other than FX options, swaptions and similar products, price at which the owner of an option can buy or sell the underlying asset of the option. • For foreign exchange options, exchange rate at which the option can be exercised, expressed as the rate of exchange from converting the unit currency into the quoted currency. In the example 0.9426 USD/EUR, USD is the unit currency and EUR is the quoted currency; USD 1 = EUR 0.9426. Where the strike price is not known when a new transaction is reported, the strike price is updated as it becomes available. • For volatility and variance swaps and similar products the volatility strike price is reported in this data element.	ISO 20022: Option/Strike Price  Num(18,13), if Strike price notation = 1 Num(11,10), if Strike price notation = 3  Any value (eg USD 6.39) expressed as 6.39, for equity options, commodity options, foreign exchange options and similar products, if Strike price notation = 1.  Any value expressed as decimals (eg 0.021 instead of 2.1%), for interest rate options, interest rate and credit swaptions quoted in spread, and similar products, if Strike price notation = 3.	✓	✓	✓	✓	✓			To be mandated
74	Strike price currency/currency pair	Where applicable: For equity options, commodity options, and similar products, currency in which the strike price is denominated. For foreign exchange options: Currency pair and order in which the strike price is expressed. It is expressed as unit	ISO 4217  Char(3) For foreign exchange options: Char(3)/Char(3); [Unit currency/Quoted currency] without restricting the currency pair ordering  Allowable values: Currencies included in ISO 4217	✓	✓	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		currency/quoted currency. Strike price currency/currency pair is only applicable if Strike price notation = 1.									
75	Strike price notation	Manner in which the Strike price is expressed, if applicable.	Char(1)  Allowable values: 1 = monetary amount 3 = decimal	✓	✓	✓	✓	✓			To be mandated
76	<del>Strike price schedule - Unadjusted effective date of the strike price</del>  [Strike price schedule - Effective date]*	Where applicable: for options, swaptions and similar products with strike prices varying throughout the life of the transaction: Unadjusted effective date of the strike price.  Strike price schedule is only applicable if the strike price varies per schedule.	ISO 8601 YYYY-MM-DD, based on UTC, repeatable for each date.	✓	✓	✓	✓	✓		We understand that a new data element name will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.  *The change in square brackets is subject to the final conclusion to version 4 of the CDE Technical Guidance.	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
77	<del>Strike price schedule—Unadjusted end date of the strike price</del>  [Strike price schedule - End date]*	Where applicable: for options, swaptions and similar products with strike prices varying throughout the life of the transaction: Unadjusted end date of the strike price. (not applicable if the unadjusted end date of a given schedule's period is back-to-back with the unadjusted effective date of the subsequent period).  Strike price schedule is only applicable if the strike price varies per schedule.	ISO 8601 YYYY-MM-DD, based on UTC, repeatable for each date.	✓	✓	✓	✓	✓		We understand that a new data element name will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.  *The change in square brackets is subject to the final conclusion to version 4 of the CDE Technical Guidance.	To be mandated
78	<del>Strike price schedule—Strike price in effect between the unadjusted effective date and unadjusted end date-inclusive</del>  [Strike price schedule - Strike price]*	Where applicable: for options, swaptions and similar products with strike prices varying throughout the life of the transaction: Strike price in effect between the unadjusted effective date and unadjusted end date inclusive.  Strike price schedule is only applicable if the strike price varies per schedule.	ISO 20022 Option/Strike Price  Char(3) Currencies included in ISO 4217 and Num(18,13), if Strike price notation = 1  Num(11,10), if Strike price notation = 3  Any value greater than zero: - Any value (eg USD 6.39) expressed as 6.39, for equity options, commodity options, foreign exchange options and similar products if Strike price notation = 1.  - Any value expressed as decimal (eg 0.021 instead of 2.1%), for interest rate options, interest rate and credit swaptions quoted in spread, and similar products, if Strike price notation = 3.  Repeatable for each strike price.	✓	✓	✓	✓	✓		We understand that a new data element name will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.  *The change in square brackets is subject to the final conclusion to version 4 of the CDE Technical Guidance.	To be mandated
79	Option premium amount	For options and swaptions of all asset classes, monetary amount paid by the	Num(25,5) Any value greater than or equal to zero.	✓	✓	✓	✓	✓			To be mandated



Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		option buyer. This data element is not applicable if the instrument is not an option or does not embed any optionality, if applicable.									
80	Option premium currency	For options and swaptions of all asset classes, currency in which the option premium amount is denominated. This data element is not applicable if the instrument is not an option or does not embed any optionality, if applicable.	ISO 4217  Char(3)  Allowable values: Currencies included in ISO 4217	✓	✓	✓	✓	✓			To be mandated
81	Option premium payment date	Unadjusted date on which the option premium is paid, if applicable.	ISO 8601 YYYY-MM-DD, based on UTC.	✓	✓	✓	✓	✓			To be mandated
82	First exercise date	First unadjusted date during the exercise period in which an option can be exercised, if applicable.  For European-style options, this date is same as the Expiration date. For American-style options, the first possible exercise date is the unadjusted date included in the execution timestamp. For knock-in options, where the first exercise date is not known when a new transaction is reported, the first exercise date is updated	ISO 8601 YYYY-MM-DD, based on UTC.	✓	✓	✓	✓	✓	For knock-in options, where the first exercise date is not known when a new transaction is reported, the first exercise date is updated as it becomes available. If the options knocked in and terminated, should the first exercise date still need to be reported? We would appreciate if the HKMA could consider reporting for this	Reporting entities should report the "First exercise date" before reporting the termination event.	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		as it becomes available.  This data element is not applicable if the instrument is not an option or does not embed any optionality.							field to be optional.		
83	Exchange rate	Exchange rate between the two different currencies specified in the OTC derivative transaction agreed by the counterparties at the inception of the transaction, expressed as the rate of exchange from converting the unit currency into the quoted currency, if applicable.	ISO 20022 CurrencyExchange/ExchangeRate Num(18,13) Any value greater than zero.	x	✓	x	x	x			To be mandated
84	Exchange rate basis	Currency pair and order in which the exchange rate is denominated, expressed as unit currency/quoted currency, if applicable.  In the example 0.9426 USD/EUR, USD is the unit currency and EUR is the quoted currency, USD 1 = EUR 0.9426.	Char(3)/Char(3); [Unit currency/Quoted currency], without restricting the currency pair ordering (i.e. the exchange rate basis may be USD/EUR or EUR/USD). Any pair of currencies included in ISO 4217.	x	✓	x	x	x			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
85	Notional amount - Leg 1	<p>Where applicable: Notional amount of leg 1.</p> <p>- for OTC derivative transactions negotiated in monetary amounts, amount specified in the contract.</p> <p>- for OTC derivative transactions negotiated in non-monetary amounts: (1) Equity options and similar products: Product of the strike price and the number of shares or index units (2) Equity forwards and similar products: Product of the forward price and the number of shares or index units (3) Equity dividend swaps and similar products: Product of the period fixed strike and the number of shares or index units. (4) Equity swaps, portfolio swaps and similar products: Product of the initial price and the number of shares or index units. (5) Equity variance swaps and similar products: <del>Variance amount</del>. [Vega notional amount]* (6) Equity volatility swaps and similar products: Vega notional amount</p>	<p>ISO 20022: Derivative/NotionalCurrencyAndAmount</p> <p>Num(25,5)</p> <p>Any value (Negative values are only allowed for commodity derivatives when applies).</p>	✓	✓	✓	✓	✓	<p>1. For worst-of / cheapest-to-deliver basket-type equity swaps, given the final delivery only involves one of the shares (but not all), how should we report the notional amount?</p> <p>2. For equity swaps, if the performance payout is based on the final share price divided by the strike price, where the strike price is defined as a % of the initial share price, then, for this field, should we report the initial price of the share or the strike price (given this is treated as the quasi of initial price)?</p> <p>3. (Product nature) For gold swaps / forwards that involve Paper Gold (without physical settlement), is this reported as a commodity forward / FX</p>	<p>"Notional amount" is a data field in the pre-implementation reporting templates and the products mentioned are currently being reported. There is no change to the reporting approach in relation to these products after implementation.</p> <p>We understand that a minor change to the definition of this data field will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.</p> <p>*The change in square brackets is subject to the final conclusion to version 4 of the CDE Technical Guidance.</p>	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		<p>(7) Equity CFDs and similar products: Product of the initial price and the number of shares or index units</p> <p>(8) Commodity options and similar products: Product of the strike price and the total notional quantity</p> <p>(9) Commodity forwards and similar products: Product of the forward price and the total notional quantity</p> <p>(10) Commodity fixed/float swaps and similar products: Product of the fixed price and the total notional quantity</p> <p>(11) Commodity basis swaps and similar products: Product of the last available spot price at the time of the transaction of the underlying asset of the leg with no spread and the total notional quantity of the leg with no spread</p> <p>(12) Commodity swaptions and similar products: Notional amount of the underlying contract</p> <p>(13) Commodity CFDs and similar products: Product of the initial price and the total notional quantity</p>							forward / not reportable at all?		

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		<p>Notes to the conversion table for OTC derivative transactions negotiated in non-monetary amounts:</p> <p>Note 1: for transactions where the quantity unit of measure differs from the price unit of measure, the price or total quantity is converted to a unified unit of measure.</p> <p>Note 2: if applicable to the transaction, the notional amount reflects any multipliers and option entitlements.</p> <p>Note 3: for basket-type contracts, the notional amount of the transaction is the sum of the notional amounts of each constituent of the basket.</p> <p>In addition:</p> <p>For OTC derivative transactions with a notional amount schedule, the initial notional amount, agreed by the counterparties at the inception of the transaction, is reported in this data element.</p> <p>For OTC foreign exchange options, in addition to this data element, the amounts are reported using the data elements Call amount and Put amount.</p> <p>For amendments or lifecycle events, the</p>									To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		resulting outstanding notional amount is reported; (steps in notional amount schedules are not considered to be amendments or lifecycle events); Where the notional amount is not known when a new transaction is reported, the notional amount is updated as it becomes available.									

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
86	Notional amount - Leg 2	<p>Where applicable: Notional amount of leg 2.</p> <p>- for OTC derivative transactions negotiated in monetary amounts, amount specified in the contract.</p> <p>- for OTC derivative transactions negotiated in non-monetary amounts: (1) Equity options and similar products: Product of the strike price and the number of shares or index units (2) Equity forwards and similar products: Product of the forward price and the number of shares or index units (3) Equity dividend swaps and similar products: Product of the period fixed strike and the number of shares or index units. (4) Equity swaps, portfolio swaps and similar products: Product of the initial price and the number of shares or index units. (5) Equity variance swaps and similar products: <del>Variance amount</del>. [Vega notional amount]* (6) Equity volatility swaps and similar products: Vega notional amount</p>	<p>ISO 20022: Derivative/NotionalCurrencyAndAmount</p> <p>Num(25,5)</p> <p>Any value (Negative values are only allowed for commodity derivatives when applies).</p>	✓	✓	✓	✓	✓		<p>We understand that a minor change to the definition of this data field will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.</p> <p>*The change in square brackets is subject to the final conclusion to version 4 of the CDE Technical Guidance.</p>	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		<p>(7) Equity CFDs and similar products: Product of the initial price and the number of shares or index units</p> <p>(8) Commodity options and similar products: Product of the strike price and the total notional quantity</p> <p>(9) Commodity forwards and similar products: Product of the forward price and the total notional quantity</p> <p>(10) Commodity fixed/float swaps and similar products: Product of the fixed price and the total notional quantity</p> <p>(11) Commodity basis swaps and similar products: Product of the last available spot price at the time of the transaction of the underlying asset of the leg with no spread and the total notional quantity of the leg with no spread</p> <p>(12) Commodity swaptions and similar products: Notional amount of the underlying contract</p> <p>(13) Commodity CFDs and similar products: Product of the initial price and the total notional quantity</p>									



Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		<p>Notes to the conversion table for OTC derivative transactions negotiated in non-monetary amounts:</p> <p>Note 1: for transactions where the quantity unit of measure differs from the price unit of measure, the price or total quantity is converted to a unified unit of measure.</p> <p>Note 2: if applicable to the transaction, the notional amount reflects any multipliers and option entitlements.</p> <p>Note 3: for basket-type contracts, the notional amount of the transaction is the sum of the notional amounts of each constituent of the basket.</p> <p>In addition:</p> <p>For OTC derivative transactions with a notional amount schedule, the initial notional amount, agreed by the counterparties at the inception of the transaction, is reported in this data element.</p> <p>For OTC foreign exchange options, in addition to this data element, the amounts are reported using the data elements Call amount and Put amount.</p> <p>For amendments or lifecycle events, the</p>									To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		resulting outstanding notional amount is reported; (steps in notional amount schedules are not considered to be amendments or lifecycle events); Where the notional amount is not known when a new transaction is reported, the notional amount is updated as it becomes available.									
87	Delta	The ratio of the change in the price of an OTC derivative transaction to the change in the price of the underlier if applicable.	Num(25,5) Any value	✓	✓	✓	✓	✓			To be mandated
88	Call amount	For <del>foreign-exchange any</del> * options, the monetary amount that the option gives the right to buy.	ISO 20022: CurrencyOption/CallAmount Num(25,5) Any value <del>[greater than zero. (Negative values are only allowed for commodity derivatives when applies, e.g. to account for the cost of storage).]</del> *	*✓	✓	*✓	*✓	*✓		<p>We understand that some changes to the definition and format will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.</p> <p>We will also make this data field applicable to all 5 asset classes.</p> <p>*The changes in square</p>	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
										brackets are subject to the final conclusion to version 4 of the CDE Technical Guidance and ISO message standard.	
89	Put amount	For <del>[foreign-exchange any]</del> options, the monetary amount that the option gives the right to sell.	ISO 20022: CurrencyOption/PutAmount Num(25,5) Any value <del>[greater than zero]</del> . (Negative values are only allowed for commodity derivatives when applies, e.g. to account for the cost of storage).*	*✓	✓	*✓	*✓	*✓		<p>We understand that some changes to the definition and format will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.</p> <p>We will also make this data field applicable to all 5 asset classes.</p> <p>*The changes in square brackets are subject to the final conclusion to version 4 of the CDE Technical Guidance and ISO message standard.</p>	To be mandated
90	Notional currency - Leg 1	Where applicable: the currency in which the notional amount of leg 1 is denominated.	ISO 4217 Char(3)  Allowable values: Currencies included in ISO 4217	✓	✓	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
91	Notional currency - Leg 2	Where applicable: the currency in which the notional amount of leg 2 is denominated.	ISO 4217  Char(3)  Allowable values: Currencies included in ISO 4217	✓	✓	✓	✓	✓			To be mandated
92	Call currency	For <del>[foreign-exchange any]</del> * options, the currency in which the Call amount is denominated	ISO 4217  Char(3)  Allowable values: Currencies included in ISO 4217	*✓	✓	*✓	*✓	*✓		We understand that a change to the definition of this data field will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.  We will also make this data field applicable to all 5 asset classes.  *The change in square brackets is subject to the final conclusion to version 4 of the CDE Technical Guidance.	To be mandated
93	Put currency	For <del>[foreign-exchange any]</del> * options, the currency in which the Put amount is denominated	ISO 4217  Char(3)  Allowable values: Currencies included in ISO 4217	*✓	✓	*✓	*✓	*✓		We understand that a change to the definition of this data field will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.  We will also make this data field applicable to all 5 asset classes.  *The change in square brackets is subject to the final conclusion to version	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
										4 of the CDE Technical Guidance.	
94	Quantity unit of measure - Leg 1	Where applicable: unit of measure in which the Total notional quantity and the Notional quantity schedules are expressed of leg 1.	ISO 20022: ProductQuantity/UnitOfMeasure Char(4)  Allowable values: ISO 20022: approved external UnitOfMeasureCode codeset	x	x	✓	x	✓			To be mandated
95	Quantity unit of measure - Leg 2	Where applicable: unit of measure in which the Total notional quantity and the Notional quantity schedules are expressed of leg 2.	ISO 20022: ProductQuantity/UnitOfMeasure Char(4)  Allowable values: ISO 20022: approved external UnitOfMeasureCode codeset	x	x	✓	x	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
96	<del>Notional-amount schedule– Unadjusted date on which the associated notional-amount becomes effective –Leg-1</del>  [Notional amount schedule - Effective date - Leg 1]*	Where applicable: for OTC derivative transactions negotiated in monetary amounts with a notional amount schedule: Unadjusted date on which the associated notional amount becomes effective of leg 1.  The initial notional amount and associated unadjusted effective and end date are reported as the first values of the schedule. This data element is not applicable to OTC derivative transactions with notional amounts that are condition- or event-dependent.	ISO 8601 YYYY-MM-DD, based on UTC, repeatable for each date.	✓	✓	✓	✓	✓	For field "Notional Schedule – Notional Amount", we recommend that the negative value be allowed for Commodity transactions only, in line with "Notional Amount".	We understand that version 4 of the CDE Technical Guidance may give guidance in this regard. We will align with the international practice when the relevant paper is published.  We understand that a new data element name will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.  *The change in square brackets is subject to the final conclusion to version 4 of the CDE Technical Guidance.	To be mandated
97	<del>Notional-amount schedule– Unadjusted date on which the associated notional-amount becomes effective –Leg-2</del>  [Notional amount schedule - Effective date - Leg 2]*	Where applicable: for OTC derivative transactions negotiated in monetary amounts with a notional amount schedule: Unadjusted date on which the associated notional amount becomes effective of leg 2.  The initial notional amount and associated unadjusted effective and end date are reported as the first values of the schedule. This data element is not applicable to OTC derivative transactions with notional amounts	ISO 8601 YYYY-MM-DD, based on UTC, repeatable for each date.	✓	✓	✓	✓	✓	For field "Notional Schedule – Notional Amount", we recommend that the negative value be allowed for Commodity transactions only, in line with "Notional Amount".	We understand that version 4 of the CDE Technical Guidance may give guidance in this regard. We will align with the international practice when the relevant paper is published.  We understand that a new data element name will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.  *The change in square brackets is subject to the final conclusion to version 4 of the CDE Technical Guidance.	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		that are condition- or event-dependent.									
98	<del>Notional amount schedule – Unadjusted end date of the notional amount – Leg 1</del>  [Notional amount schedule - End date - Leg 1]*	Where applicable: for OTC derivative transactions negotiated in monetary amounts with a notional amount schedule: Unadjusted end date of the notional amount of leg 1 (not applicable if the unadjusted end date of a given schedule's period is back-to-back with the unadjusted effective date of the subsequent period)  The initial notional amount and associated unadjusted effective and end date are reported as the first values of the schedule. This data element is not applicable to OTC	ISO 8601 YYYY-MM-DD, based on UTC, repeatable for each date.	✓	✓	✓	✓	✓	For field "Notional Schedule – Notional Amount", we recommend that the negative value be allowed for Commodity transactions only, in line with "Notional Amount".	We understand that version 4 of the CDE Technical Guidance may give guidance in this regard. We will align with the international practice when the relevant paper is published.  We understand that a new data element name will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.  *The change in square brackets is subject to the final conclusion to version 4 of the CDE Technical Guidance.	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		derivative transactions with notional amounts that are condition- or event-dependent.									
99	<del>Notional amount schedule - Unadjusted end date of the notional amount - Leg 2</del>  [Notional amount schedule - End date - Leg 2]*	Where applicable: for OTC derivative transactions negotiated in monetary amounts with a notional amount schedule: Unadjusted end date of the notional amount of leg 2 (not applicable if the unadjusted end date of a given schedule's period is back-to-back with the unadjusted effective date of the subsequent period)  The initial notional amount and associated unadjusted effective and end date are reported as the first values of the schedule. This data element is not applicable to OTC derivative transactions with notional amounts that are condition- or event-dependent.	ISO 8601 YYYY-MM-DD, based on UTC, repeatable for each date.	✓	✓	✓	✓	✓	For field "Notional Schedule – Notional Amount", we recommends that the negative value be allowed for Commodity transactions only, in line with "Notional Amount".	We understand that version 4 of the CDE Technical Guidance may give guidance in this regard. We will align with the international practice when the relevant paper is published.  We understand that a new data element name will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.  *The change in square brackets is subject to the final conclusion to version 4 of the CDE Technical Guidance.	To be mandated



Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
100	<del>Notional amount schedule – Notional amount which becomes effective on the associated unadjusted effective date – Leg 1</del>  [Notional amount schedule - Notional amount - Leg 1]*	Where applicable: for OTC derivative transactions negotiated in monetary amounts with a notional amount schedule: Notional amount which becomes effective on the associated unadjusted effective date of leg 1.  The initial notional amount and associated unadjusted effective and end date are reported as the first values of the schedule. This data element is not applicable to OTC derivative transactions with notional amounts that are condition- or event-dependent. The currency of the varying notional amounts in the schedule is reported in Notional currency.	ISO 20022: Derivative/NotionalCurrencyAndAmount  <del>Char(3) Currencies included in ISO 4217 and Num(25,5)</del>  Any value [(Negative values are only allowed for commodity derivatives when applies, e.g. to account for the cost of storage).]*  Repeatable for each notional amount.	✓	✓	✓	✓	✓	For field "Notional Schedule – Notional Amount", we recommend that the negative value be allowed for Commodity transactions only, in line with "Notional Amount".	We understand that a change to the format and allowable values of this data field will be proposed in version 4 of the CDE Technical Guidance may give guidance in this regard. We will align with international practice when the paper is published.  We understand that a new data element name will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.  *The changes in square brackets are subject to the final conclusion to version 4 of the CDE Technical Guidance.	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
101	<del>Notional-amount schedule-</del> <del>Notional-amount which becomes effective on the associated unadjusted effective date-</del> <del>Leg-2</del>  [Notional amount schedule - Notional amount - Leg 2]*	Where applicable: for OTC derivative transactions negotiated in monetary amounts with a notional amount schedule: Notional amount which becomes effective on the associated unadjusted effective date of leg 2.  The initial notional amount and associated unadjusted effective and end date are reported as the first values of the schedule. This data element is not applicable to OTC derivative transactions with notional amounts that are condition- or event-dependent. The currency of the varying notional amounts in the schedule is reported in Notional currency.	ISO 20022: Derivative/NotionalCurrencyAndAmount  Char(3) Currencies included in ISO 4217 and Num(25,5)  Any value [(Negative values are only allowed for commodity derivatives when applies, e.g. to account for the cost of storage).]*  Repeatable for each notional amount.	✓	✓	✓	✓	✓	For field "Notional Schedule – Notional Amount", we recommend that the negative value be allowed for Commodity transactions only, in line with "Notional Amount".	We understand that a change to the format and allowable values of this data field will be proposed in version 4 of the CDE Technical Guidance may give guidance in this regard. We plan to align with international practice when the paper is published.  We understand that a new data element name will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.  *The changes in square brackets are subject to the final conclusion to version 4 of the CDE Technical Guidance.	To be mandated
102	Total notional quantity - Leg 1	Where applicable: aggregate Notional quantity of the underlying asset for the term of the transaction of leg 1, if applicable.  Where the Total notional quantity is not known when a new transaction is reported, the Total notional quantity is updated as it becomes available.	Num(25,5) Any value greater than or equal to zero.	x	x	✓	x	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
103	Total notional quantity - Leg 2	Where applicable: aggregate Notional quantity of the underlying asset for the term of the transaction of leg 2, if applicable.  Where the Total notional quantity is not known when a new transaction is reported, the Total notional quantity is updated as it becomes available.	Num(25,5) Any value greater than or equal to zero.	x	x	✓	x	✓			To be mandated
104	<del>Notional-quantity schedule– Unadjusted date on which the associated notional-quantity becomes effective –Leg 1</del>  [Notional quantity schedule - Effective date - Leg 1]*	Where applicable: for OTC derivative transactions negotiated in non-monetary amounts with a Notional quantity schedule: Unadjusted date on which the associated notional quantity becomes effective of leg 1.  The initial notional quantity and associated unadjusted effective and end date are be reported as the first values of the schedule.  This data element is not applicable to OTC derivative transactions with notional quantities that are condition- or event-dependent.	ISO 8601 YYYY-MM-DD, based on UTC, repeatable for each date.	x	x	x	x	✓		We understand that a new data element name will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.  *The change in square brackets is subject to the final conclusion to version 4 of the CDE Technical Guidance.	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
105	<del>Notional-quantity schedule– Unadjusted date on which the associated notional-quantity becomes effective –Leg-2</del>  [Notional quantity schedule - Effective date - Leg 2]*	Where applicable: for OTC derivative transactions negotiated in non-monetary amounts with a Notional quantity schedule: Unadjusted date on which the associated notional quantity becomes effective of leg 2.  The initial notional quantity and associated unadjusted effective and end date are be reported as the first values of the schedule. This data element is not applicable to OTC derivative transactions with notional quantities that are condition- or event-dependent.	ISO 8601 YYYY-MM-DD, based on UTC, repeatable for each date.	x	x	x	x	✓		We understand that a new data element name will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.  *The change in square brackets is subject to the final conclusion to version 4 of the CDE Technical Guidance.	To be mandated
106	<del>Notional-quantity schedule– Unadjusted end date of the notional-quantity– Leg-4</del>  [Notional quantity schedule - End date - Leg 1]*	Where applicable: for OTC derivative transactions negotiated in non-monetary amounts with a Notional quantity schedule: Unadjusted end date of the notional quantity of leg 1. (not applicable if the unadjusted end date of a given schedule's period is back-to-back with the unadjusted effective date of the subsequent period)  The initial notional quantity and associated unadjusted effective and	ISO 8601 YYYY-MM-DD, based on UTC, repeatable for each date.	x	x	x	x	✓		We understand that a new data element name will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.  *The change in square brackets is subject to the final conclusion to version 4 of the CDE Technical Guidance.	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		end date are be reported as the first values of the schedule. This data element is not applicable to OTC derivative transactions with notional quantities that are condition- or event-dependent.									
107	<del>Notional quantity schedule - Unadjusted end date of the notional quantity - Leg 2</del>  [Notional quantity schedule - End date - Leg 2]*	Where applicable: for OTC derivative transactions negotiated in non-monetary amounts with a Notional quantity schedule: Unadjusted end date of the notional quantity of leg 2. (not applicable if the unadjusted end date of a given schedule's period is back-to-back with the unadjusted effective date of the subsequent period)  The initial notional quantity and associated unadjusted effective and end date are be reported as the first values of the schedule. This data element is not applicable to OTC derivative transactions with notional quantities that are condition- or event-dependent.	ISO 8601 YYYY-MM-DD, based on UTC, repeatable for each date.	x	x	x	x	✓		We understand that a new data element name will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.  *The change in square brackets is subject to the final conclusion to version 4 of the CDE Technical Guidance.	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
108	<del>Notional-quantity schedule-</del> <del>Notional-quantity which becomes effective on the associated unadjusted effective date-</del> <del>Leg 1</del>  [Notional quantity schedule - Notional quantity - Leg 1]"	Where applicable: for OTC derivative transactions negotiated in non-monetary amounts with a Notional quantity schedule: Notional quantity which becomes effective on the associated unadjusted effective date of leg 1.  The initial notional quantity and associated unadjusted effective and end date are be reported as the first values of the schedule. This data element is not applicable to OTC derivative transactions with notional quantities that are condition- or event-dependent.	Num(25,5) Any value greater than or equal to zero.  Repeatable for each notional quantity.	x	x	x	x	✓		We understand that a new data element name will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.  *The change in square brackets is subject to the final conclusion to version 4 of the CDE Technical Guidance.	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
109	<del>Notional-quantity schedule-</del> <del>Notional-quantity which becomes effective on the associated unadjusted effective date-</del> <del>Leg-2</del>  [Notional quantity schedule - Notional quantity - Leg 2]*	Where applicable: for OTC derivative transactions negotiated in non-monetary amounts with a Notional quantity schedule: Notional quantity which becomes effective on the associated unadjusted effective date of leg 2.  The initial notional quantity and associated unadjusted effective and end date are be reported as the first values of the schedule. This data element is not applicable to OTC derivative transactions with notional quantities that are condition- or event-dependent.	Num(25,5) Any value greater than or equal to zero.  Repeatable for each notional quantity.	x	x	x	x	✓		We understand that a new data element name will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.  *The change in square brackets is subject to the final conclusion to version 4 of the CDE Technical Guidance.	To be mandated
110	CDS index attachment point	Defined lower point at which the level of losses in the underlying portfolio reduces the notional of a tranche. For example, the notional in a tranche with an attachment point of 3% will be reduced after 3% of losses in the portfolio have occurred. This data element is not applicable if the transaction is not a CDS tranche transaction (index or custom basket).	ISO 20022: Tranche/AttachmentPoint Num(11,10) Any value between 0 and 1 (including 0 and 1), expressed as decimal (e.g. 0.05 instead of 5%).	x	x	x	✓	x			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
111	CDS index detachment point	Defined point beyond which losses in the underlying portfolio no longer reduce the notional of a tranche. For example, the notional in a tranche with an attachment point of 3% and a detachment point of 6% will be reduced after there have been 3% of losses in the portfolio. 6% losses in the portfolio deplete the notional of the tranche. This data element is not applicable if the transaction is not a CDS tranche transaction (index or custom basket).	ISO 20022: Tranche/AttachmentPoint Num(11,10) Any value between 0 and 1 (including 0 and 1), expressed as decimal (e.g. 0.05 instead of 5%).	x	x	x	✓	x			To be mandated
112	Other payment amount	Payment amounts with corresponding payment types to accommodate requirements of transaction descriptions from different asset classes, if applicable.	Num(25,5) Any value greater than or equal to zero.  Repeatable in the case of multiple payments	✓	✓	✓	✓	✓			To be mandated



Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
113	Other payment type	Type of Other payment amount, if applicable. Option premium payment is not included as a payment type as premiums for option are reported using the option premium dedicated data element.	Char(4)  Repeatable in the case of multiple payments  Allowable values: UFRO = Upfront Payment, i.e. the initial payment made by one of the counterparties either to bring a transaction to fair value or for any other reason that may be the cause of an off-market transaction  UWIN = Unwind or Full termination, i.e. the final settlement payment made when a transaction is unwound prior to its end date; Payments that may result due to full termination of derivative transaction(s)  PEXH = Principal Exchange, i.e. Exchange of notional values for cross- currency swaps	✓	✓	✓	✓	✓			To be mandated
114	Other payment currency	Currency in which Other payment amount is denominated, if applicable.	ISO 4217  Char(3)  Repeatable in the case of multiple payments  Allowable values: Currencies included in ISO 4217	✓	✓	✓	✓	✓			To be mandated
115	Other payment date	Unadjusted date on which the other payment amount is paid, if applicable.	ISO 8601 YYYY-MM-DD, based on UTC.  Repeatable in the case of multiple payments	✓	✓	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
116	Other payment payer	Identifier of the payer of Other payment amount, if applicable.	<p>ISO 17442 Legal Entity Identifier (LEI) Char(20), for an LEI code Varchar(72), for natural persons who are acting as private individuals (not eligible for an LEI per the ROC Statement - Individuals Acting in a Business Capacity).</p> <p>Repeatable in the case of multiple payments</p> <p>Allowable values: LEI code that is included in the LEI data as published by the Global LEI Foundation (GLEIF, www.gleif.org/).</p> <p>For natural persons who are acting as private individuals (not eligible for an LEI per the ROC Statement - Individuals Acting in a Business Capacity): LEI of the reporting counterparty followed by a unique identifier assigned and maintained consistently by the reporting counterparty for that natural person(s) for regulatory reporting purpose.</p>	✓	✓	✓	✓	✓			To be mandated
117	Other payment receiver	Identifier of the receiver of Other payment amount, if applicable.	<p>ISO 17442 Legal Entity Identifier (LEI) Char(20), for an LEI code Varchar(72), for natural persons who are acting as private individuals (not eligible for an LEI per the ROC Statement - Individuals Acting in a Business Capacity).</p> <p>Repeatable in the case of multiple payments</p> <p>Allowable values: LEI code that is included in the LEI data as published by the Global LEI Foundation (GLEIF, www.gleif.org/).</p> <p>For natural persons who are acting as private individuals (not eligible for an LEI per the ROC Statement - Individuals Acting in a Business Capacity): LEI of the reporting counterparty followed by a unique identifier assigned and maintained consistently by the reporting counterparty for that natural person(s) for regulatory reporting purpose.</p>	✓	✓	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
118	Package identifier	<p>Where applicable: identifier (determined by the Reporting Party) in order to connect - two or more transactions that are reported separately by the reporting counterparty, but that are negotiated together as the product of a single economic agreement. - two or more reports pertaining to the same transaction whenever jurisdictional reporting requirement does not allow the transaction to be reported with a single report to TRs. A package may include reportable and non-reportable transactions.</p> <p>This data element is not applicable - if no package is involved, or - to allocations</p> <p>Where the package identifier is not known when a new transaction is reported, the package identifier is updated as it becomes available.</p>	<p>Varchar(35)</p> <p>Up to 35 alphanumeric characters.</p>	✓	✓	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
119	Package transaction price	Where applicable: traded price of the entire package in which the reported derivative transaction is a component. This data element is not applicable if - no package is involved, or - package transaction spread is used Prices and related data elements of the transactions (Price currency, Price notation, Price unit of measure) that represent individual components of the package are reported when available. The package transaction price may not be known when a new transaction is reported but may be updated later.	ISO 20022: Price/Amount Num(18,13), if Package transaction price notation = 1 Num(11,10), if Package transaction price notation = 3  Any value, if Package transaction price notation = 1 Any value expressed as decimal (eg 0.0257 instead of 2.57%), if Package transaction price notation = 3	✓	✓	✓	✓	✓			To be mandated
120	Package transaction price currency	Where applicable: currency in which the Package transaction price is denominated.  This data element is not applicable if - no package is involved, or - Package transaction spread is used, or - Package transaction price notation = 3	ISO 4217  Char(3)  Allowable values: Currencies included in ISO 4217	✓	✓	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
121	Package transaction price notation	Where applicable: manner in which the Package transaction price is expressed.  This data element is not applicable if - no package is involved, or - Package transaction spread is used	Char(1)  Allowable values: 1 = monetary amount 3 = decimal	✓	✓	✓	✓	✓			To be mandated
122	Package transaction spread	Where applicable: traded price of the entire package in which the reported derivative transaction is a component of a package transaction. Package transaction price when the price of the package is expressed as a spread, difference between two reference prices.  This data element is not applicable if - no package is involved, or - Package transaction price is used  Spread and related data elements of the transactions (spread currency, Spread notation) that represent individual components of the package are reported when available. Package transaction spread may not be known when a new transaction is reported	ISO 20022: Spread/SpreadRate or ISO 20022: Spread/PriceOffset or ISO 20022: Spread: BasisPointSpread  Num(18,13), if Package transaction spread notation = 1 Num(11,10), if Package transaction spread notation = 3 Num(5), if Package transaction spread notation = 4  Any value, if Package transaction spread notation = 1 Any value expressed as decimal (eg 0.0257 instead of 2.57%), Package spread price notation = 3 Any integer value expressed in basis points (eg 257 instead of 2.57%), if Package transaction spread notation = 4	✓	✓	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		but may be updated later.									
123	Package transaction spread currency	Where applicable: currency in which the Package transaction spread is denominated.  This data element is not applicable if - no package is involved, or - Package transaction price is used, or - Package transaction spread notation = 3 or = 4	ISO 4217  Char(3)  Allowable values: Currencies included in ISO 4217	✓	✓	✓	✓	✓			To be mandated
124	Package transaction spread notation	Where applicable: manner in which the Package transaction spread is expressed.  This data element is not applicable if • no package is involved, or • Package transaction price is used	Char(1)  Allowable values: 1 = monetary amount 3 = decimal 4 = basis points	✓	✓	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
125	Prior UTI (for one-to-one and one-to-many relations between transactions)	Where applicable: UTI assigned to the predecessor transaction that has given rise to the reported transaction due to a lifecycle event, in a one-to-one relation between transactions (eg in the case of a novation, when a transaction is terminated, and a new transaction is generated) or in a one-to-many relation between transactions (eg in clearing or if a transaction is split into several different transactions). This data element is not applicable when reporting many-to-one and many-to-many relations between transactions (eg in the case of a compression).	<p><u>For Prior UTI</u> ISO 23897 Unique transaction identifier Varchar(52) Up to 52 alphanumeric characters</p> <p><u>For proprietary ID</u> Varchar(72)</p>	✓	✓	✓	✓	✓	<p><b>Comment (i)</b> We note that the format of "Prior UTI" field is specified to be the ISO 23897 Unique transaction identifier Varchar (52) in the proposal. We believe a non-UTI identifier should be allowed on this field for scenarios involving a legacy trade such as going through a novation. Generally, for other jurisdictions, a transaction identifier that does not conform to UTI technical guidance is accepted on this field as the legacy trade may not have a UTI. Meanwhile, the ISO 20022 XML message allows up to 72 characters on this field as well.</p> <p><b>Comment (ii)</b> We would like HKMA to clarify that this data element is not</p>	<p>We agree with the respondent's suggestion of allowing a non-UTI format in this data field. When a legacy trade does not have a UTI, reporting entities may populate either a USI or TID in this data field. We have updated the format and allowable values.</p> <p>Paragraph 91 of the SRI provides guidance in instances where the step-in party does not have access to information relating to the identifiers from the original trade in novation. The principle outlined in paragraph 91 of the SRI will continue to apply after the implementation and we will update the SRI to cater to post-implementation situations.</p>	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
									required when the Reporting Entity and/or Counterparty 1 was not a party to the predecessor OTC derivatives, which is also in line with ASIC's proposal to this data element. This would give clarity that the reporting entity is not required to report this data element in case such as the counterparty 1 being a "step-in" entity in a novation scenario.		
126	Custom basket code	Where applicable: if the OTC derivative transaction is based on a custom basket, unique code assigned by the structurer of the custom basket to link its constituents. This data element is not applicable if no custom basket is	Varchar(72) ISO 17442 Legal Entity Identifier (LEI) code of the basket structurer followed by a unique identifier up to 52 alphanumeric characters.	✓	✓	✓	✓	✓	Please specify the conditions under which this field is applicable, especially if dealer A applies this field but dealer B does not. It will be challenging for	Please refer to the definition of the data field for situations when this data field is applicable. If a reporting entity does not know that a custom basket code is assigned to the underlying of a trade by its counterparty,	To be mandated



Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		involved or no unique code has been assigned to it.							the industry to adopt this field in a consistent manner.	the reporting entity may leave this data field blank.	
127	Basket constituent identifier	An identifier that represents a constituent of an underlying custom basket, in line with the Underlier ID within the ISO 4914 UPI reference data elements, as maintained by the UPI Service Provider or in line with an identifier that would be reported as an Underlier ID (Other) where the UPI Underlier ID is 'OTHER'. This data element is not applicable if no custom basket is involved.	Varchar(350 210) An identifier that can be used to determine an asset, index or benchmark included in a basket Up to 350 210 alphanumeric characters.  Repeatable in the case of multiple basket constituents	✓	✓	✓	✓	✓		We have updated the format and allowable values to align with the ISO XML format.	To be mandated
128	Basket constituent unit of measure	Where applicable: unit of measure in which the number of units of a particular custom basket constituent is expressed. This data element is not applicable if no custom basket is involved.	ISO 20022: ProductQuantity/Unit Of Measure Code Char(4) ISO 20022: approved external UnitOfMeasureCode codeset  Repeatable in the case of multiple basket constituents	✓	✓	✓	✓	✓	Not adopted or not commonly by other APAC regulators. We would hence like to propose for SFC and HKMA to not require these fields to align reporting requirements with other major APAC jurisdictions.	This is a data field published in the CDE Technical Guidance and we understand that CFTC also mandates it. This is a useful data field for analysing a basket of underlying assets and we will therefore mandate it.	To be mandated
129	Basket constituent number of units	Where applicable: the number of units of a particular constituent in a custom basket. This data element is not applicable if no custom basket is involved.	Num(18,13) Any value greater than zero.  Repeatable in the case of multiple basket constituents	✓	✓	✓	✓	✓	Not adopted or not commonly by other APAC regulators. We would hence like to propose for SFC and HKMA	This is a data field published in the CDE Technical Guidance and we understand that CFTC also mandates it. This is a useful data field for analysing a basket of	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
									to not require these fields to align reporting requirements with other major APAC jurisdictions.	underlying assets and we will therefore mandate it.	
130	Basket constituent identifier source	Where applicable: the origin, or publisher, of the associated Basket constituent identifier, in line with the Underlier ID source within the ISO 4914 UPI reference data elements as maintained by the UPI Service Provider or in line with the allowable value that would be reported as an Underlier ID (Other) source where the UPI Underlier ID is 'OTHER'. This data element is not applicable if no custom basket is involved.	Varchar( <del>350</del> 100) The origin, or publisher, of the associated basket constituent identifier. Up to <del>350</del> 100 alphanumeric characters.  Repeatable in the case of multiple basket constituents	✓	✓	✓	✓	✓		We have updated the format and allowable values to align with the ISO XML format.	To be mandated

131	Underlier ID (OTHER)	Where applicable: the asset(s), index (indices) or benchmark underlying a contract or, in the case of a foreign exchange derivative, identification of index. This data element is applicable when the value of Underlier ID is submitted as 'OTHER' to the UPI service provider.	<p>Varchar(350 210)</p> <p>An identifier that can be used to determine the asset(s), index (indices) or benchmark underlying a contract.</p> <p>[For the 'Underlier ID' exists in the golden source that is the reference data source for the UPI service provider's enumerations of Underlier IDs but is not yet included in the UPI service provider's actual list of enumerations (i.e. there is a lag between a new 'Underlier ID' being created in the golden source and it being added to the UPI service provider's list of enumerations), the allowable should be the value as it exists in the golden source that is the reference data source for the UPI service provider's enumerations of Underlier IDs.</p> <p>For the 'Underlier ID' does not exist in the golden source that is the reference data source for the UPI service provider's enumerations of Underlier IDs, the allowable should be the name/identifier:</p> <ul style="list-style-type: none"> <li>• as it would be if it was added to the relevant golden source using the naming conventions of that golden source, or</li> <li>• using naming conventions as set out below.</li> </ul> <p>Interest Rate Floating Rate Index : ISDA FRO Name Inflation Index : ISDA FRO Name Equity Equity Index Name : Publisher's official long name of the index Equity Stock Identifier : If no ISIN (e.g. an unlisted stock), then official registered name of the stock—CFI 2nd character—CFI 3rd character Equity Index Identifier : Publisher's official long name of the index Credit Debt Security Identifier : If no ISIN, then official registered name of the issuer—Maturity Date—Type of interest—Interest Rate—Interest Frequency—Debt Seniority Debt Index Identifier : Publisher's official long name of the index Non-LEI entity identifier : Legal entity name as would be recorded in an LEI record Commodity Commodity Index : Publisher's official long name</p>	✓	✓	✓	✓	✓	We recommend the inclusion of FIGI as a specific option for the reporting in field 131 Underlier ID (other). This would help improve the DSB's current approach, by providing underlier ID in the UPI reference data, which effectively augments and improves data quality.	<p>We understand that addition of clarification to the format and allowable values will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.</p> <p>*The change in square brackets is subject to the final conclusion to version 4 of the CDE Technical Guidance.</p> <p>There is no restriction to use FIGI in this data field. The added clarification has addressed how non-UPI identifiers should be populated.</p>	To be mandated
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Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
132	Underlier ID (OTHER) source	Where applicable: the origin, or publisher, of the associated Underlier ID (Other). This data element is applicable when the value of Underlier ID source is submitted as 'OTHER' to the UPI service provider.	Varchar( <del>350</del> <u>100</u> ) The origin, or publisher, of the associated Underlier ID.  [If naming conventions have been used, the corresponding source should be as set out below. Interest Rate Floating Rate Index : ISDA FRO Naming Convention Inflation Index : ISDA FRO Naming Convention Equity Equity Index Name : Publisher's legal name Equity Stock Identifier : CDE equity name and type Equity Index Identifier : Publisher's legal name Credit Debt Security Identifier : CDE debt name and type Debt Index Identifier : Publisher's legal name Non-LEI entity identifier : Entity name Commodity Commodity Index : Publisher's legal name Commodity Reference Price : ISDA CRP Naming Convention Other Exchange-traded future : All Exchange-traded option : All Digital Asset : ISO 24165]* Up to <del>350</del> <u>100</u> alphanumeric characters.	✓	✓	✓	✓	✓		We understand that addition of clarification to the format and allowable values will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.  *The change in square brackets is subject to the final conclusion to version 4 of the CDE Technical Guidance.	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
133	Underlying asset trading platform identifier	Where applicable: for a platform (e.g. exchange) traded underlying asset, the platform on which the asset is traded. This data element is not applicable to OTC derivative transactions with custom basket constituents.	ISO 10383 Segment Market Identifier Code (MIC) Char(4) ISO 10383 Segment Market identifier codes.	✓	✓	✓	✓	✓	<p><b><u>Comment (i)</u></b> This data element is not adopted by other APAC regional regulators (ASIC and MAS), therefore building operational capabilities specifically for HKMA requirements will increase cost of compliance for reporting entities. We would like HKMA to consider excluding this data element to enable harmonization as much as possible.</p> <p>If HKMA would still like to mandate this data element, we would like HKMA to confirm our understanding that this data element is not applicable if the underlier is index (indices) or benchmark.</p> <p><b><u>Comment (ii)</u></b> We take note that ISO 10383 contains</p>	<p>This is a new data field published in version 3 of the CDE Technical Guidance in September 2023 and other jurisdictions may mandate this data field when they update their reporting regime. As this data field is important in identifying the platforms on which underlying assets are trading, we will mandate it.</p> <p>This data field is not applicable if the underlier is index (indices), benchmark or custom basket constituents.</p> <p>The respondent of comment (ii) appears to have mixed up a trade transacting on a Bloomberg platform versus the underlier of a trade being traded on a Bloomberg platform. This data field should be populated where the underlying asset of a transaction is traded on a platform and reporting entities should check the ISO 10383 Segment MIC list for the appropriate value to populate.</p>	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
									<p>selections quoting Bloomberg. Where a trader transacts a deal with counterparties via Bloomberg channel, does it imply that one of those values must be selected? How could we select the appropriate "Bloomberg" channel to apply?</p>		

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
134	Underlying asset price source	Where applicable: for an underlying asset or benchmark not traded on a platform, the source of the price used to determine the value or level of the asset or benchmark. This data element is not applicable to OTC derivative transactions with custom basket constituents.	Varchar(50) Up to 50 alphanumeric characters.	✓	✓	✓	✓	✓	<p><b>Comment (i)</b> Newly added as part of CDE technical guidance – version 3 consultation document. In the joint industry response via ISDA, we have requested for both data elements to be removed from CDE (detailed reasons elaborated in the response ). As there are no other jurisdictions requiring these 2 fields, we would like to propose that SFC and HKMA drop these two fields.</p> <p><b>Comment (ii)</b> We take note that this data field takes a free text format, yet this is not a mandatory field in operations systems today nor a confirmable field in the confirmation process. To ease the reporting burden, could we propose not to report this field?</p>	<p>This is a new data field published in version 3 of the CDE Technical Guidance in September 2023 and other jurisdictions may mandate this data field when they update their reporting regime. As this data field is important in identifying the price source of non-platform trading underlying assets, we will mandate it.</p> <p>Reporting entities are expected to enhance their systems to capture the required information in implementing the CDE data elements.</p>	To be mandated



Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
135	Crypto asset underlying indicator	Where applicable: indicator of whether the underlying of the derivative is crypto asset. This element should be reported as 'true' if any of the underlying is a crypto asset (immediate or ultimate underlying as well as where the derivative is based on a mix of crypto assets and other underlying).	Boolean  Allowable values: true, if underlying is crypto asset false, if underlying is not crypto asset	✓	✓	✓	✓	✓	<p>Only JFSA adopts it as "derivatives based on crypto-assets". We would like HKMA to consider excluding this data element to harmonise requirements with major APAC regulators.</p> <p>If HKMA would still like to mandate this data element, we would like HKMA to provide more guidance on determination of crypto asset underlying given crypto asset is a relatively new element in OTC derivatives reporting. We would also like to clarify whether OTC derivatives with crypto asset as the underlying should be reported as Commodity under "asset class", which is the approach adopted by some other regulators.</p>	<p>As the CDE categorisation of asset classes does not include crypto asset, this data field is useful in identifying an underlier which is a crypto asset. We understand that CFTC, JFSA and ESMA also mandates this data field. As such, we will mandate it.</p> <p>As international discussions on how to classify crypto asset underlying is still evolving, we will monitor international developments and align with the international practice. Also, we will provide guidance in the SRI on how crypto asset underlying should be reported based on the outcomes of international discussions.</p>	To be mandated

136	Action type	Type of action taken on the transaction or type of end-of-day reporting.	<p>Char(4)</p> <p>Allowable values:  NEWT = New  <i>The creation of the first transaction resulting in the generation of a new UTI.</i></p> <p>MODI = Modify  <i>A modification of the terms of a previously reported transaction due to a newly negotiated modification (amendment) or a filling in of not available missing information (e.g., post price transaction). It does not include correction of a previously reported transaction.</i></p> <p>CORR = Correct  <i>A correction of erroneous data of a previously reported transaction.</i></p> <p>EROR = Error  <i>A cancellation of a wrongly submitted entire transaction in case it never came into existence or was not subject to the reporting requirements under the applicable law of a given jurisdiction, or a cancellation of a duplicate report.</i></p> <p>TERM = Terminate  <i>A termination of a previously reported transaction.</i></p> <p>REVI = Revive  <i>An action that reinstates a reported transaction that was reported with action type "Error" or terminated by mistake or expired due to an incorrectly reported Expiration date.</i></p> <p>PRTO = Transfer out  <i>A transfer of a transaction from one reporting agent to another reporting agent (change of reporting agent) or other administration reason such as to stop a reporting agent from further accessing the subsequent trade action of a particular trade.</i></p> <p>VALU = Valuation  <i>An update of a valuation of a transaction. There will be no corresponding Event type.</i></p> <p>MARU = Collateral/Margin update  <i>An update to collateral margin data. There will be no corresponding Event type.</i></p>	✓	✓	✓	✓	✓		<p>We have updated the format in respect of "PRTO (transfer out)" to accommodate another possible scenario.</p>	To be mandated
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Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
137	Event type	Explanation or reason for the action being taken on the transaction.	Char(4)  Allowable values: TRAD = Trade <i>Creation or modification of a transaction.</i>  NOVA = Novation/Step-in <i>A novation or step-in legally moves part or all of the financial risks of a transaction from a transferor to a transferee and has the effect of terminating/modifying the original transaction so that it is either terminated or its notional is modified.</i>  COMP = Post trade risk reduction exercise <i>Compressions and other post trade risk reduction exercises generally have the effect either of terminating or modifying (i.e., reducing the notional value) a set of existing transactions and/or of creating a set of new transaction(s). These processes result in largely the same exposure of market risk that existed prior to the event for the counterparty.</i>  ETRM = Early termination <i>Termination of an existing transaction prior to expiration date.</i>  CLRG = Clearing <i>Central clearing is a process where a central counterparty (CCP) interposes itself between counterparties to transactions, becoming the buyer to every seller and the seller to every buyer and thereby ensuring the performance of open transactions. It has the effect of terminating an existing transaction between the buyer and the seller.</i>  EXER = Exercise <i>The full or partial exercise of an option or swaption by one counterparty of the transaction.</i>  ALOC = Allocation <i>The process by which portions of a single</i>	✓	✓	✓	✓	✓	1. Are we expected to refresh the MTM or collateral valuation of the trade if actions like amendments have taken place?  2. What is the expected reporting frequency of updates on MTM and collateral valuation? (Given no amendments) What is the corresponding event type and event timestamp?  3. We would appreciate a more detailed guidance about how each of the event types should be reported (Please provide relevant examples for demonstration purpose).  For CCP novation, it would currently be reported as NEW – Term – NEW. We would like to seek the HKMA's clarification on	An amendment event is different from a valuation event and collateral event.  Currently, trade valuation reporting should be done every business day according to the Reporting Rules. There will be no change in this regard after implementation.  Collateral updates should be carried out according to the relevant margin requirements. We will provide further guidance in the SRI on how collateral updates and other event types should be reported.  A valuation event, collateral event and amendment event should follow separate procedures according to the action and event type definition.	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
			<i>transaction (or multiple transactions) are allocated to one or multiple different counterparties and reported as new transactions.</i>						which novation event type is referred to in this situation? Whether it would be the CCP or M&A? We would appreciate if the HKMA could consider keeping the current reporting method for novation.		

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
			<p>CLAL = Clearing &amp; Allocation A simultaneous clearing and allocation event in a central counterparty (CCP).</p> <p>CREV = Credit event An event that results in a modification or a termination of a previously submitted credit transaction. Applies only to credit derivatives.</p> <p>PTNG = Transfer The process by which a transaction is transferred to another reporting agent that has the effect of the closing of the transaction reported by one reporting agent and opening of the same transaction using the same UTI by a different agent.</p> <p>CORP = Corporate event The process by which a corporate action is taken on equity underlying that impacts the transactions on that equity.</p> <p>UPDT = Update Update of an outstanding transaction performed in order to ensure its conformity with the amended reporting requirements.</p>								To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
138	Event timestamp	<p>Date and time of occurrence of the event.</p> <p>In the case of a modification agreed for a future date, this data element should reflect the date, the modification occurs (becomes effective) and not when it was negotiated.</p> <p>In the case of a correction, this data element should reflect the date and time as of when the correction is applicable.</p> <p>In the case of a clearing event, this data element should reflect the recorded date and time when the alpha transaction is accepted by the central counterparty (CCP) for clearing.</p> <p><del>In the case of collateral update, the date and time for which the information contained in the report is provided.</del></p>	ISO 8601 YYYY-MM-DDThh:mm:ssZ, based on UTC.	✓	✓	✓	✓	✓		We have simplified the definition to align with other jurisdictions. For the date and timestamp for collateral updates, reporting entities should populate #192 "Collateral timestamp".	To be mandated
139	Event identifier	<p><del>Where applicable: Unique identifier to link transactions entering into and resulting from an event, which may be, but is not limited to, compression or other post-trade risk reduction exercises, credit event, etc. The unique identifier</del></p>	<p><del>Varchar(52)</del>  ISO-17442 Legal Entity Identifier (LEI) code of the entity assigning the event identifier followed by a unique identifier up to 32 characters.</p>	✗	✗	✗	✗	✗	Suppose an option has been partially exercised 4 times during its lifecycle. Does a new event identifier apply to each of the partial exercise? And	Having re-assessed the balance between the regulators' need for this information and the reporting entities' compliance burden, we will make this data field optional.	Optional

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		<del>may be assigned by the reporting counterparty or a service provider or CCP providing the service.</del>							that the event identifier cannot be commonly shared by similar partial exercise events in other transactions?		
140	Unique Transaction Identifier (UTI)	The unique transaction identifier as described in the Technical Guidance on the Harmonization of the Unique Transaction Identifier published by the Committee on Payments and Market Infrastructures and Board of International Organization of Securities Commissions in February 2017.	<u>For Global UTI</u> ISO 23897 - Unique transaction identifier Varchar(52) Up to 52 alphanumeric characters, only the upper-case alphabetic characters A–Z and the digits 0–9 are allowed  <u>For proprietary ID</u> Varchar(72)	✓	✓	✓	✓	✓		Some live legacy trades will be re-reported to the HKTR in the post-implementation format but these trades will not require re-generation of a UTI. Hence we have amended the "Format and allowable values" to allow for the use of USI or TID in this situation.	To be mandated
141	Unique Product Identifier (UPI)	A unique set of characters that represents a particular OTC derivative.	<u>For UPI</u> ISO 4914 - Unique product identifier UPI code in accordance with the ISO standard implemented pursuant to the FSB governance arrangements for the UPI Varchar(52)	✓	✓	✓	✓	✓		We have updated the format and allowable values to align with the ISO XML format.	To be mandated
142	Notional quantity - Leg 1	Where applicable, Notional quantity of leg 1. For swap transactions negotiated in non-monetary amounts with fixed notional quantity for each schedule period (i.e., 50 barrels per month).  The frequency is reported in Quantity frequency and the unit of	Num(25,5) Any value greater than or equal to zero.	x	x	x	x	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		measure is reported in Quantity unit of measure.									
143	Notional quantity - Leg 2	Where applicable, Notional quantity of leg 2. For swap transactions negotiated in non-monetary amounts with fixed notional quantity for each schedule period (i.e., 50 barrels per month).  The frequency is reported in Quantity frequency and the unit of measure is reported in Quantity unit of measure.	Num(25,5) Any value greater than or equal to zero.	x	x	x	x	✓			To be mandated
144	Quantity frequency - Leg 1	The rate at which the quantity is quoted on the leg 1 of the swap transaction. e.g., hourly, daily, weekly, monthly, if applicable.	Char(4)  Allowable values: HOUL = Hourly DAIL = Daily WEEK = Weekly MNTH = Monthly ONDE = OnDemand YEAR = Yearly EXPI = End of term ADHO = Ad hoc which applies when payments are irregular	x	x	x	x	✓			To be mandated



Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
145	Quantity frequency - Leg 2	The rate at which the quantity is quoted on the leg 2 of the swap transaction. e.g., hourly, daily, weekly, monthly, if applicable.	Char(4)  Allowable values: HOUL = Hourly DAIL = Daily WEEK = Weekly MNTH = Monthly ONDE = OnDemand YEAR = Yearly EXPI = End of term ADHO = Ad hoc which applies when payments are irregular	x	x	x	x	✓			To be mandated
146	Quantity frequency multiplier - Leg 1	The number of time units for the Quantity frequency of leg 1, if applicable.	Num(3,0) Any value greater than or equal to zero.	x	x	x	x	✓			To be mandated
147	Quantity frequency multiplier - Leg 2	The number of time units for the Quantity frequency of leg 2, if applicable.	Num(3,0) Any value greater than or equal to zero.	x	x	x	x	✓			To be mandated
148	Fixing date - Leg 1	Describes the specific date when a non-deliverable forward as well as various types of FX OTC options such as cash-settled options that will "fix" against a particular exchange rate, which will be used to compute the ultimate cash settlement of leg 1, if applicable.	ISO 8601 YYYY-MM-DDThh:mm:ssZ, based on UTC.	x	✓	x	x	x		We have updated the format and allowable values to align with the ISO XML format.	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
149	Fixing date - Leg 2	Describes the specific date when a non-deliverable forward as well as various types of FX OTC options such as cash-settled options that will "fix" against a particular exchange rate, which will be used to compute the ultimate cash settlement of leg 2, if applicable.	ISO 8601 YYYY-MM-DDThh:mm:ssZ, based on UTC.	x	✓	x	x	x		We have updated the format and allowable values to align with the ISO XML format.	To be mandated
150	Floating rate reset frequency period - Leg 1	Where applicable: time unit associated with the frequency of payments resets, e.g. day, week, month, year or term of the stream for the floating rate of leg 1.	Char(4)  Allowable values: DAIL = Daily WEEK = Weekly MNTH = Monthly YEAR = Yearly ADHO = Ad hoc which applies when payments are irregular EXPI = Payment at term	✓	*	✓	✓	✓		Data fields #150-153 are duplicates of data fields #173, 174, 178 and 179. Hence we will not mandate data fields #150-153.	To be removed
151	Floating rate reset frequency period - Leg 2	Where applicable: time unit associated with the frequency of payments resets, e.g. day, week, month, year or term of the stream for the floating rate of leg 2.	Char(4)  Allowable values: DAIL = Daily WEEK = Weekly MNTH = Monthly YEAR = Yearly ADHO = Ad hoc which applies when payments are irregular EXPI = Payment at term	✓	*	✓	✓	✓		Data fields #150-153 are duplicates of data fields #173, 174, 178 and 179. Hence we will not mandate data fields #150-153.	To be removed

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
152	Floating-rate-reset frequency multiplier—Leg 1	Where applicable: number of time units (as expressed by the payment frequency period) that determines the frequency at which periodic payment resets dates occur for the floating rate of leg 1. For example, a transaction with payments occurring every two months is represented with a payment frequency period of "MNTM" (monthly) and a payment frequency period multiplier of 2. This data element is not applicable if the payment frequency period is "ADHO". If payment frequency period is "TERM", then the payment frequency period multiplier is 1. If the payment frequency is intraday, then the payment frequency period is "DAIL" and the payment frequency multiplier is 0.	Num(3,0) Any value greater than or equal to zero.	✓	*	✓	✓	✓		Data fields #150-153 are duplicates of data fields #173, 174, 178 and 179. Hence we will not mandate data fields #150-153.	To be removed
153	Floating-rate-reset frequency multiplier—Leg 2	Where applicable: number of time units (as expressed by the payment frequency period) that determines the frequency at which periodic payment resets dates occur for the floating rate of leg 2. For example, a transaction with payments occurring every two months is	Num(3,0) Any value greater than or equal to zero.	✓	*	✓	✓	✓		Data fields #150-153 are duplicates of data fields #173, 174, 178 and 179. Hence we will not mandate data fields #150-153.	To be removed

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		represented with a payment frequency period of "MNTH" (monthly) and a payment frequency period multiplier of 2. This data element is not applicable if the payment frequency period is "ADHO". If payment frequency period is "TERM", then the payment frequency period multiplier is 1. If the payment frequency is intraday, then the payment frequency period is "DAIL" and the payment frequency multiplier is 0.									
154	Index factor	The index version factor or percent, expressed as a decimal value, that multiplied by the Notional amount yields the notional amount covered by the seller of protection for credit default swap, if applicable.	Num(11,10) Any value between 0 and 1 (including 0 and 1), expressed as decimal (e.g.0.05 instead of 5%).	x	x	x	✓	x			To be mandated
155	Embedded option type	Type of option or optional provision embedded in a contract, if applicable.	Char(4)  Allowable values: MDET = Mandatory early termination OPET = Optional early termination CANC = Cancellable EXTD = Extendible OTHR = Other	✓	✓	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
156	Initial margin collateral portfolio code	<p>If collateral is reported on a portfolio basis, a unique code assigned by the reporting counterparty to the portfolio that tracks the aggregate initial margin of a set of open swap transactions, if applicable.</p> <p>This data element is not applicable if the collateralisation was performed on a transaction level basis, or if there is no collateral agreement, or if no collateral is posted or received or if only one collateral portfolio of amounts of margin that does not distinguish between margin that is initial margin and margin that is variation margin.</p>	Varchar(52) Up to 52 alphanumeric characters.	✓	✓	✓	✓	✓	We notice that the proposal includes both Collateral Portfolio Code and a pair of IM / VM Portfolio Codes. From globally and regionally, it is either Collateral Portfolio Code (EU-EMIR and UK-EMIRE) or the pair of the IM / VM Portfolio Codes (CFTC, ASIC, MAS, JFSA), but not both. We believe that the HKMA and the SFC should review and implement either one but not both.	Please see our response to #38.	To be mandated
157	Portfolio containing non-reportable component indicator	<p>If collateral is reported on a portfolio basis, indicator of whether the collateral portfolio includes swap transactions exempt from reporting., if applicable.</p>	Boolean  Allowable values: true: for collateral portfolio contains one or more nonreported transactions; or false: for collateral portfolio does not contain one or more non-reported transactions	✓	✓	✓	✓	✓	Does this data field relate to IM or VM or either one of them?	We will provide further guidance in the SRI on how collateral should be reported.	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
158	Variation margin collateral portfolio code	<p>If collateral is reported on a portfolio basis, a unique code assigned by the reporting counterparty to the portfolio that tracks the aggregate variation margin related to a set of open swap transactions, if applicable.</p> <p>This data element is not applicable if the collateralisation was performed on a transaction level basis, or if there is no collateral agreement, or if no collateral is posted or received or if only one collateral portfolio of amounts of margin that does not distinguish between margin that is initial margin and margin that is variation margin.</p>	Varchar(52) Up to 52 alphanumeric characters.	✓	✓	✓	✓	✓	We notice that the proposal includes both Collateral Portfolio Code and a pair of IM / VM Portfolio Codes. From globally and regionally, it is either Collateral Portfolio Code (EU-EMIR and UK-EMIRE) or the pair of the IM / VM Portfolio Codes (CFTC, ASIC, MAS, JFSA), but not both. We believe that the HKMA and the SFC should review and implement either one but not both.	Please see our response to #38.	To be mandated
159	<del>Submitting Party</del> [Submitter Identifier]*	<p><del>In the case where the entity responsible for reporting has delegated the submission of the report to a third party or to the other counterparty, this entity has to be identified in this field by a unique code. Otherwise the entity responsible for reporting should be identified in this field.</del></p> <p>[Identifier of the entity submitting the OTC derivative transaction to the Trade Repository.]*</p>	ISO 17442 Legal Entity Identifier (LEI) Char(20)  LEI code that is included in the LEI data as published by the Global LEI Foundation (GLEIF, www.gleif.org/).	✓	✓	✓	✓	✓	Not adopted or not commonly by other APAC regulators. Only ASIC requires. We would hence like to propose for SFC and HKMA to not require these fields to align reporting requirements with other major APAC jurisdictions.	We understand that a new data element name and new definition will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.  This is an important TR control field. Therefore we will mandate it.  *The changes in square brackets are subject to the final conclusion to version 4 of the CDE Technical Guidance.	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
160	Entity responsible for reporting	Identification code of the Reporting Party who has the obligation to report the transaction.	ISO 17442 Legal Entity Identifier (LEI) Char(20)	✓	✓	✓	✓	✓			To be mandated
161	Country of the counterparty 2	The code of country where the registered office of the other counterparty is located or country of residence in case that the other counterparty is a natural person.	ISO 3166 - 2 character country code	✓	✓	✓	✓	✓	<p><b>Comment (i)</b> This data element is not adopted by MAS and is adopted by ASIC only when an LEI is not reported for "counterparty 2". Building operational capabilities specifically for HKMA requirements will increase cost of compliance for reporting entities. We would like HKMA to consider excluding this data element to enable harmonization as much as possible.</p> <p>If HKMA would still like to mandate this data element, we would like HKMA to provide guidance particularly when counterparty 2 is a branch of an entity - are we expected to report the country</p>	<p>We understand that ESMA and ASIC also mandate this data field and it is important information to the regulators. Hence we will mandate this data field.</p> <p>To align with the practice of other jurisdictions in reporting LEI, reporting entities are expected to report the country of the headquarter instead of the country of the branch office of the Counterparty 2.</p>	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
									<p>of the branch where available, as opposed to the country of the branch's headquarter?</p> <p><b>Comment (ii)</b> Does this data field relate to the place of incorporation or the location of the counterparty's branch / office? (e.g. when we deal with Sydney Branch of a firm whose Head Office is incorporated in France, shall we report Australia or France in this field?)</p>		
462	Broker ID	If a broker acted as intermediary for the Reporting Entity in relation to the Reportable Transaction, without becoming a counterparty to the OTC Derivative the subject of the Reportable	<p>ISO 17442 Legal Entity Identifier (LEI) Char(20)</p> <p>LEI code that is included in the LEI data as published by the Global LEI Foundation (GLEIF, <a href="http://www.gleif.org/">www.gleif.org/</a>).</p>	✓	✓	✓	✓	✓		Having re-assessed the balance between the regulators' need for this information and the reporting entities' compliance burden, we will make this data field optional.	Optional



Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		<del>Transaction, the current LEI of the broker.</del>									
163	Contract type	Each reported contract shall be classified according to its type, if applicable.	Char(4)  Allowable values: CFDS = Financial contracts for difference FRAS = Forward rate agreements FUTR = Futures FORW = Forwards OPTN = Option SPDB = Spreadbet SWAP = Swap SWPT = Swaption OTHR = Other	✓	✓	✓	✓	✓	Could this field be deduced from the UPI and if yes, could this field be removed as it's a duplicate?	As explained in the Consultation Paper, we will align our practice with other regulators' by maintaining certain product-related data fields as the UPI service is a new set-up. "Contract type" is one of them.	To be mandated
164	Asset Class	Each reported contract shall be classified according to the asset class it is based on, if applicable.	Char(4)  Allowable values: CRDT - Credit CURR - Currency EQUI - Equity INTR - Interest Rate COMM - Commodity	✓	✓	✓	✓	✓	Could this field be deduced from the UPI and if yes, could this field be removed as it's a duplicate?	As explained in our Consultation Paper, we will align our practice with other regulators' by maintaining certain product-related data fields as the UPI service is a new set-up. "Asset class" is one of them.	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
165	Underlying identification type	The type of relevant underlying identifier, if applicable.	Char(1)  Allowable values: I = ISIN B = Basket X = Index O = Other	✓	✗✓	✓	✓	✓		We will make this data field applicable to all 5 asset classes.	To be mandated
166	Underlying identification	The direct underlying shall be identified by using a unique identification for this underlying based on its type. For Credit Default Swaps, the ISIN of the reference obligation should be provided, if applicable.	For underlying identification type I: ISO 6166 ISIN 12 character alphanumeric code For underlying identification type X: ISO 6166 ISIN if available	✓	✗✓	✓	✓	✓		We will make this data field applicable to all 5 asset classes.	To be mandated
167	Name of the underlying index	The full name of the underlying index as assigned by the index provider, if applicable.	Varchar(50) Up to 50 alphanumeric characters. Special characters are allowed if they form part of the full name of the index.	✓	✗✓	✓	✓	✓		We will make this data field applicable to all 5 asset classes.	To be mandated
168	Clearing timestamp	Time and date when clearing took place, if applicable.	ISO 8601 YYYY-MM-DDThh:mm:ssZ, based on UTC.	✓	✓	✓	✓	✓			To be mandated
169	Delivery type	Indicates whether the contract is settled physically or in cash, if applicable.	Char(4)  Allowable values: CASH = Cash PHYS = Physical OPTL = Optional for counterparty or when determined by a third party	✓	✓	✓	✓	✓	For Equity Swaps that involve physical delivery of shares, but when there is fractional share, that part will become cash-settled, with this combination, which of the values should we select?	"Delivery type" is a data field in the pre-implementation reporting templates. There is no change to the approach in reporting delivery type after implementation.	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
170	Identifier of the floating rate - Leg 1	Where applicable: an identifier of the interest rates used which are reset at predetermined intervals by reference to a market reference rate of leg 1.	If the floating rate has an ISIN, the ISIN code for that rate.	✓	✗✓	✓	✓	✓		We will make this data field applicable to all 5 asset classes.	To be mandated

171	Indicator of the floating rate - Leg 1	An indication of the interest rate of leg 1, where available.	<p>Char(4) The indication of the floating rate index. Please refer to the ExternalBenchmarkCurveName1Code list from ISO 20022's Inventory of External Code Sets. For index that is not included in the list, please use OTHR = OTHER.</p> <p>ESTR = €STR SONA = SONIA SOFR = SOFR EONIA = EONIA EONS = EONIA-SWAP EURI = EURIBOR EUUS = EURODOLLAR EUCH = EuroSwiss GCFR = GCF-REPO ISDA = ISDAFIX LIBI = LIBID LIBO = LIBOR MAAA = Muni-AAA PFAN = Pfandbriefe TIBO = TIBOR STBO = STIBOR BBSW = BBSW JIBA = JIBAR BUBO = BUBOR CDOR = CDOR CIBO = CIBOR MOSP = MOSPRIM NIBO = NIBOR PRBO = PRIBOR TLBO = TELBOR WIBO = WIBOR TREA = Treasury SWAP = SWAP FUSW = Future-SWAP EFFR = Effective Federal Funds Rate OBFR = Overnight Bank Funding Rate CZNA = CZEONIA</p>	✓	✗✓	✓	✓	✓	<p>We would like HKMA to clarify whether the acceptable value is only limited to the list provided as we notice some indices are not covered in the list, such as AONIA,TONA, etc. Otherwise, we would like HKMA to consider "OTHER" as an acceptable value for this data element.</p>	<p>To address the respondent's concerns, we have updated the format and allowable values to support the full index list in the ISO XML format and have added "Other" as an acceptable value for flexibility.</p> <p>We will also make this data field applicable to all 5 asset classes.</p>	To be mandated
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Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
172	Name of the floating rate - Leg 1	The full name of the interest rate as assigned by the index provider of leg 1, if applicable.	Varchar(50) Up to 50 alphanumeric characters. Special characters are allowed if they form part of the full name of the index.	✓	*✓	✓	✓	✓	We would like HKMA to clarify whether this data element is required only if the floating rate is not one of the allowable indicator of the floating rate under data element #171, given the floating rate index is reported under data element #171.	When the floating rate of the trade is not in the list of the floating rates under the data element #171, reporting entities should populate "Other" in #171 and populate the name of the floating rate in #172.  We will also make this data field applicable to all 5 asset classes.	To be mandated
173	Floating rate reference period - Leg 1 – time period	Time period describing the reference period for the floating rate of leg 1, if applicable.	Char(4)  Allowable values: DAIL = daily WEEK = weekly MNTH = monthly YEAR = yearly ADHO = ad hoc which applies when payments are irregular EXPI = payment at term	✓	*✓	✓	✓	✓	What is the difference between this field and Field 150 (Rate Reset Period)? Please provide relevant examples to demonstrate the key difference(s) between these 2 fields.	Data fields #150-153 are duplicates of data fields #173, 174, 178 and 179. Hence we will not mandate data fields #150-153.  We will also make this data field applicable to all 5 asset classes.	To be mandated
174	Floating rate reference period - Leg 1 – multiplier	Multiplier of the time period describing the reference period for the floating rate of leg 1, if applicable.	Num(3,0) Any integer value greater than or equal to zero up to 3 numeric characters.	✓	*✓	✓	✓	✓		Data fields #150-153 are duplicates of data fields #173, 174, 178 and 179. Hence we will not mandate data fields #150-153.  We will also make this data field applicable to all 5 asset classes.	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
175	Identifier of the floating rate - Leg 2	Where applicable: an identifier of the interest rates used which are reset at predetermined intervals by reference to a market reference rate of leg 2.	If the floating rate has an ISIN, the ISIN code for that rate.	✓	✗✓	✓	✓	✓		We will make this data field applicable to all 5 asset classes.	To be mandated

176	Indicator of the floating rate - Leg 2	An indication of the interest rate of leg 2, where available.	<p>Char(4) The indication of the floating rate index. Please refer to the ExternalBenchmarkCurveName1Code list from ISO 20022's Inventory of External Code Sets. For index that is not included in the list, please use OTHR = OTHER.</p> <p>ESTR = €STR SONA = SONIA SOFR = SOFR EONIA = EONIA EONS = EONIA-SWAP EURI = EURIBOR EUUS = EURODOLLAR EUCH = EuroSwiss GCFR = GCF-REPO ISDA = ISDAFIX LIBI = LIBID LIBO = LIBOR MAAA = Muni-AAA PFAN = Pfandbriefe TIBO = TIBOR STBO = STIBOR BBSW = BBSW JIBA = JIBAR BUBO = BUBOR CDOR = CDOR CIBO = CIBOR MOSP = MOSPRIM NIBO = NIBOR PRBO = PRIBOR TLBO = TELBOR WIBO = WIBOR TREA = Treasury SWAP = SWAP FUSW = Future-SWAP EFFR = Effective Federal Funds Rate OBFR = Overnight Bank Funding Rate CZNA = CZEONIA</p>	✓	✗✓	✓	✓	✓	<p>We would like HKMA to clarify whether the acceptable value is only limited to the list provided as we notice some indices are not covered in the list, such as AONIA,TONA, etc. Otherwise, we would like HKMA to consider "OTHER" as an acceptable value for this data element.</p>	<p>To address the respondent's concerns, we have updated the format and allowable values to support the full index list in the ISO XML format and have added "Other" as an acceptable value for flexibility.</p> <p>We will also make this data field applicable to all 5 asset classes.</p>	To be mandated
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Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
177	Name of the floating rate - Leg 2	The full name of the interest rate as assigned by the index provider of leg 2, if applicable.	Varchar(50) Up to 50 alphanumeric characters. Special characters are allowed if they form part of the full name of the index.	✓	*✓	✓	✓	✓	We would like HKMA to clarify whether this data element is required only if the floating rate is not one of the allowable indicator of the floating rate under data element #176, given the floating rate index is reported under data element #176.	When the floating rate of the trade is not in the list of the floating rates under the data element #176, reporting entities should populate "Other" in #176 and populate the name of the floating rate in #177.  We will also make this data field applicable to all 5 asset classes.	To be mandated
178	Floating rate reference period - Leg 2 – time period	Time period describing the reference period for the floating rate of leg 2, if applicable.	Char(4)  Allowable values: DAIL = daily WEEK = weekly MNTH = monthly YEAR = yearly ADHO = ad hoc which applies when payments are irregular EXPI = payment at term	✓	*✓	✓	✓	✓		We will make this data field applicable to all 5 asset classes.	To be mandated
179	Floating rate reference period - Leg 2 – multiplier	Multiplier of the time period describing the reference period for the floating rate of leg 2, if applicable.	Num(3,0) Any integer value greater than or equal to zero up to 3 numeric characters.	✓	*✓	✓	✓	✓		We will make this data field applicable to all 5 asset classes.	To be mandated



180	Forward exchange rate	Forward exchange rate as agreed between the counterparties in the contractual agreement. It shall be expressed as a price of base currency in the quoted currency, if applicable.	Num(18,13) Any value greater than zero up to 18 numeric digits including up to 13 decimal places. The decimal mark is not counted as a numeric character. If populated, it shall be represented by a dot.	*	✓	*	*	*	<p><b>Comment (i)</b> Field "Forward exchange rate" should be excluded. It is understood that an FX Swap transaction is to be reported as two separate transactions at leg level under the Hong Kong reporting regime, as evidenced by the field "Swap Link ID" in the proposed field list. With this understanding, the field "Forward exchange rate" should not be required, as seen in CFTC Rewrite as well as the APAC jurisdictions. The field "Forward exchange rate" is more of an EMIR specific field, where an FX Swap transaction is required to be reported as a single transaction.</p> <p><b>Comment (ii)</b> Specific only to SFC and HKMA's proposed requirements. This data element is not adopted by other APAC regional regulators (ASIC and MAS), therefore building</p>	We agree with the respondents that this data field should not be mandated as FX swap have been reported as 2 FX forwards under the Hong Kong reporting regime.	To be removed
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									<p>operational capabilities specifically for HKMA requirements will increase cost of compliance for reporting entities. We would like HKMA to consider excluding this data element to enable harmonization as much as possible.</p> <p>If HKMA would still like to mandate this data element, we would like to seek guidance from HKMA on the usage of this data element. There is already data element #83 (Exchange Rate) for exchange rate information, and FX Swap is to be reported as 2 transactions for near and far leg (and linked by data element #194), hence it not apparent to us the usage of this data element.</p>		
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Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
181	Base product	Base product as specified in the classification of commodities in Table 4 of the Annex to Implementing Regulation (EU) 2022/1860.	Only values in the 'Base product' column of the classification of commodities derivatives table are allowed.	*	*	*	*	✓	Specific only to SFC and HKMA's proposed requirements. We would like to ask SFC and HKMA to not require these fields until there is global alignment or at least regional alignment and consensus amongst APAC regulators to require these fields.	Taking into account the respondent's feedback and having re-assessed the balance between the regulators' need for this information and the reporting entities' compliance burden, we will make this data field optional.	Optional
182	Sub-product	Sub-product as specified in the classification of commodities in Table 4 of the Annex to Implementing Regulation (EU) 2022/1860. This field requires a specific base product in field.	Only values in the 'Sub — product' column of the classification of commodities derivatives table are allowed.	*	*	*	*	✓	Specific only to SFC and HKMA's proposed requirements. We would like to ask SFC and HKMA to not require these fields until there is global alignment or at least regional alignment and consensus amongst APAC regulators to require these fields.	Taking into account the respondent's feedback and having re-assessed the balance between the regulators' need for this information and the reporting entities' compliance burden, we will make this data field optional.	Optional
183	Further sub-product	Further sub-product as specified in the classification of commodities in Table 4 of the Annex to Implementing Regulation (EU) 2022/1860. This field requires a specific sub-product in field.	Only values in the 'Further sub — product' of the classification of commodities derivatives table are allowed.	*	*	*	*	✓	Specific only to SFC and HKMA's proposed requirements. We would like to ask SFC and HKMA to not require these fields until there is global alignment or at	Taking into account the respondent's feedback and having re-assessed the balance between the regulators' need for this information and the reporting entities' compliance burden, we will make this data field optional.	Optional

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
									least regional alignment and consensus amongst APAC regulators to require these fields.		
184	Option type	Indication as to whether the derivative contract is a call (right to purchase a specific underlying asset) or a put (right to sell a specific underlying asset) or whether it cannot be determined whether it is a call or a put at the time of execution of the derivative contract, if applicable. In case of swaptions it shall be: - "Put", in case of receiver swaption, in which the buyer has the right to enter into a swap as a fixed-rate receiver. - "Call", in case of payer swaption, in which the buyer has the right to enter into a swap as a fixed-rate payer. In case of Caps and Floors it shall be: - "Put", in case of a Floor. - "Call", in case of a Cap.	Char(4)  Allowable values: PUTO = Put CALL = Call OTHR = where it cannot be determined whether it is a call or a put	✓	✓	✓	✓	✓			To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
185	Option style	Indicates whether the option may be exercised only at a fixed date (European), a series of pre-specified dates (Bermudan) or at any time during the life of the contract (American), if applicable.	Char(4)  Allowable values: AMER = American BERM = Bermudan EURO = European ASIA = Asian	✓	✓	✓	✓	✓		We have added "Asian" to the allowable values for a more complete set of allowable values.	To be mandated
186	<del>Maturity date of the underlying</del>  [Maturity date of the underlying derivative]*	In case of swaptions, maturity date of the underlying swap, if applicable.  [Expiration date of the underlying derivative. For swaptions, the expiration date of the underlying swap. For OTC derivative transactions with one or more legs that reference an exchange traded future or exchange traded option, for each leg of the transaction, where applicable, it is the expiration date of the derivative referred to in that leg that is used to determine the value of the leg on each pricing date. Multiple values are allowed.]*	<del>ISO 8601 YYYY-MM-DD, based on UTC.</del>  [YYYY-MM-DD, based on UTC  Any valid date.]*	✓	✓	✓	✓	✓		We have updated the definition of this data field to align with the latest ISO XML format.  We understand that a new data element name, definition and format and allowable values will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.  *The changes in square brackets are subject to the final conclusion to version 4 of the CDE Technical Guidance and ISO message standard.	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
187	Seniority	Indicates the seniority of the debt security, or debt basket or index underlying a derivative, if applicable.	Char(4)  Allowable values: SNDB = Senior, such as Senior Unsecured Debt (Corporate/Financial), Foreign Currency Sovereign Debt (Government)  SBOD = Subordinated, such as Subordinated or Lower Tier 2 Debt (Banks), Junior Subordinated or Upper Tier 2 Debt (Banks),  OTHR = Other, such as Preference Shares or Tier 1 Capital (Banks) or other credit derivatives	x	x	x	✓	x			To be mandated
188	Reference entity	Identification of the underlying reference entity, if applicable.	ISO 3166: 2 character country code, or ISO 3166-2: 2 character country code followed by dash "-" and up to 3 alphanumeric character country subdivision code, or ISO 17442 Legal Entity Identifier (LEI) 20 alphanumeric character code	x	x	x	✓	x			To be mandated
189	Series	The series number of the composition of the index if applicable.	Num(5,0) Any integer value greater than or equal to zero up to 5 numeric characters.	x	x	x	✓	x			To be mandated
190	<del>Series Version</del>	<del>A new version of a series is issued if one of the constituents defaults and the index has to be reweighted to account for the new number of total constituents within the index, if applicable.</del>	<del>Num(5,0) Any integer value greater than or equal to zero up to 5 numeric characters.</del>	*	*	*	✓	*	Specific only to SFC and HKMA's proposed requirements. We would like to ask SFC and HKMA to not require these fields until there is global alignment or at least regional alignment and consensus amongst APAC regulators to require these fields.	Taking into account the respondent's feedback and having re-assessed the balance between the regulators' need for this information and the reporting entities' compliance burden, we will make this data field optional.	Optional

191	Indicator of the underlying index	An indication of the underlying index, where available.	Char(4) The indication of the floating rate index:  ESTR = €STR SONA = SONIA SOFR = SOFR EONA = EONIA EONS = EONIA-SWAP EURI = EURIBOR EUUS = EURODOLLAR EUCH = EuroSwiss GCFR = GCF-REPO ISDA = ISDAFIX LIBI = LIBID LIBO = LIBOR MAAA = Muni-AAA PFAN = Pfandbriefe TIBO = TIBOR STBO = STIBOR BBSW = BBSW JIBA = JIBAR BUBO = BUBOR CDOR = CDOR CIBO = CIBOR MOSP = MOSPRIM NIBO = NIBOR PRBO = PRIBOR TLBO = TELBOR WIBO = WIBOR TREA = Treasury SWAP = SWAP FUSW = Future-SWAP EFFR = Effective Federal Funds Rate OBFR = Overnight Bank Funding Rate CZNA = CZEONIA	✓	✓	✓	✓	✓	<p><b>Comment (i)</b>  We would like HKMA to clarify whether the acceptable value is only limited to the list provided as we notice some indices are not covered in the list, such as AONIA, TONA, etc. Otherwise, we would like HKMA to consider "OTHER" as an acceptable value for this data element.</p> <p><b>Comment (ii)</b>  What is the difference between this field and Field 171 (Indicator of Floating Rate)?</p>	<p>Taking into account the respondents' feedback, this data field is a duplicate of #171 "Indicator of the floating rate - Leg 1" after the latter is made applicable to all 5 asset classes. Hence we will not mandate this data field.</p>	To be removed
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Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
192	Collateral timestamp	<del>Date and time as of which the values of the margins are reported, if applicable.</del>  [Date and time of the last margin update. Collateral timestamp reflects the moment in time that reported margin values were current.]*	ISO 8601 YYYY-MM-DDThh:mm:ssZ, based on UTC.	✓	✓	✓	✓	✓		We understand that a new definition of the data field will be proposed in version 4 of the CDE Technical Guidance. We plan to align with it.  *The change in square brackets is subject to the final conclusion to version 4 of the CDE Technical Guidance.	To be mandated
193	Trading capacity	Identifies the trading capacity of the seller.	Allowable values: AGEN = Agent (Trading as Agent on behalf of a customer) PRIN = Principal (Trading as Principal)	✓	✓	✓	✓	✓			To be mandated
194	Swap Link ID	A linking element used to link the Near Leg and Far Leg of an FX Swap, if applicable.	Varchar(100)	x	✓	x	x	x	We understand that MAS is the other jurisdiction that has required this field, while other regulators have deferred to package ID. We would like SFC and HKMA to consider removing this field to align globally if not, to align reporting requirements with MAS on this data field. MAS has provided specific guidance in their FAQ – Question 4.13 .	"Swap Link ID" is a sub-link of "Package ID" and is dedicated for identifying FX Swap, which is an important product for Hong Kong. We will mandate this data field and will align our reporting of "Swap Link ID" with MAS as far as possible.	To be mandated
195	Trader location	Location of the trading desk or trader responsible for the decision of entering into	ISO 3166 - 2 character country code	✓	✓	✓	✓	✓			To be mandated



Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
		or execution of the transaction.									
196	Booking location	Location of the trade party or the branch/office of the trade party to which the transaction is booked.	ISO 3166 - 2 character country code	✓	✓	✓	✓	✓			To be mandated
197	Intragroup	Indicates whether the contract was entered into as an intragroup transaction.  Usage: When absent, default value is false.	Boolean  Allowable values: true :- contract entered into as an intragroup transaction false :- contract not entered into as an intragroup transaction	✓	✓	✓	✓	✓	<b>Comment (i)</b> Specific only to SFC and HKMA's proposed requirements. This data element is not adopted by other APAC regional regulators (ASIC and MAS), therefore building operational capabilities specifically for HKMA requirements will increase cost of compliance for reporting entities. We would like HKMA to consider excluding this data element to enable harmonization as much as possible.  <b>Comment (ii)</b> Intragroup transaction should be regarded as internal deal and	Taking into account the respondents' feedback and having re-assessed the balance between the regulators' need for this information and the reporting entities' compliance burden, we will make this data field optional.	Optional

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
									we would appreciate if the HKMA could make this field optional.		

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
198	Nature of the counterparty 1	Indicate if the counterparty 1 is a CCP, a financial, non-financial counterparty or other type of counterparty.	<p><b><u>For Financial Counterparty (F)</u></b> Char(4)</p> <p>Allowable values: AIFD = Alternative Investment Fund ASSU = Assurance Undertaking CCPS = Central Counterparty CSDS = Central Securities Depository CDTI = Credit Institution INUN = Insurance Undertaking INVF = Investment Firm ORPI = Occupational Retirement Provision Institution OTHR = Other REIN = Reinsurance Undertaking UCIT = UCITS Management Company</p> <p><b><u>For Non-Financial Counterparty (N)</u></b> Varchar(72)</p> <p><b><u>For Central Counterparty (C) / Other type of counterparty (O)</u></b> Char(4)</p> <p><b><u>Allowable values:</u></b> NORE = No Reason</p>	✓	✓	✓	✓	✓	<p><b><u>Comment (i)</u></b> This data element is not adopted by other APAC regional regulators (ASIC and MAS), therefore building operational capabilities specifically for HKMA requirements will increase cost of compliance for reporting entities. We would like HKMA to consider excluding this data element to enable harmonization as much as possible.</p> <p>If HKMA would still like to mandate this data element, we would like to seek alignment with EMIR's classification and definition. If not, we would need detailed guidance from HKMA on the determination of "Financial Counterparty", "Non-Financial Counterparty", and "Other".</p>	This is an important data field covering the nature of a counterparty. We will therefore mandate it and will align our classification with that in EMIR. We will provide further guidance in the SRI.	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
									<p><b><u>Comment (ii)</u></b>  We would appreciate if the HKMA could consider making the reporting of such additional fields optional so that the industry could be provided with more flexibility, which would also alleviate operational burden.  In addition, we would appreciate if a more detailed description of data fields could be provided (in a format like existing AIDG Supplementary Reporting Instructions SRI); with the new fields clearly marked alongside the original fields to be shown together in Appendix B.</p>		

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
199	Nature of the counterparty 2	Indicate if the counterparty 2 is a CCP, a financial, non-financial counterparty or other type of counterparty.	<p><b><u>For Financial Counterparty (F)</u></b> Char(4)</p> <p>Allowable values: AIFD = Alternative Investment Fund ASSU = Assurance Undertaking CCPS = Central Counterparty CSDS = Central Securities Depository CDTI = Credit Institution INUN = Insurance Undertaking INVF = Investment Firm ORPI = Occupational Retirement Provision Institution OTHR = Other REIN = Reinsurance Undertaking UCIT = UCITS Management Company</p> <p><b><u>For Non-Financial Counterparty (N)</u></b> Varchar(72)</p> <p><b><u>For Central Counterparty (C) / Other type of counterparty (O)</u></b> Char(4)</p> <p><b><u>Allowable values:</u></b> NORE = No Reason</p>	✓	✓	✓	✓	✓	<p><b><u>Comment (i)</u></b> This data element is not adopted by other APAC regional regulators (ASIC and MAS), therefore building operational capabilities specifically for HKMA requirements will increase cost of compliance for reporting entities. We would like HKMA to consider excluding this data element to enable harmonization as much as possible.</p> <p>If HKMA would still like to mandate this data element, we would like to seek alignment with EMIR's classification and definition. If not, we would need detailed guidance from HKMA on the determination of "Financial Counterparty", "Non-Financial Counterparty", and "Other".</p>	This is an important data field covering the nature of a counterparty. We will therefore mandate it and will align our classification with that in EMIR. We will provide further guidance in the SRI.	To be mandated

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
									<p><b><u>Comment (ii)</u></b>  We would appreciate if the HKMA could consider making the reporting of such additional fields optional so that the industry could be provided with more flexibility, which would also alleviate operational burden.  In addition, we would appreciate if a more detailed description of data fields could be provided (in a format like existing AIDG Supplementary Reporting Instructions SRI); with the new fields clearly marked alongside the original fields to be shown together in Appendix B.</p>		

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
200	Non-standardized term indicator	indicates whether the derivative transaction has one or more additional terms or provisions that materially affect the price of the transaction.	Boolean  Allowable values: true false	✓	✓	✓	✓	✓	Specific only to SFC and HKMA's proposed requirement. This data element is not adopted by other APAC regional regulators (ASIC and MAS), therefore building operational capabilities specifically for HKMA requirements will increase cost of compliance for reporting entities. We would like HKMA to consider excluding this data element to enable harmonization as much as possible.	Taking into account the respondent's feedback and having re-assessed the balance between the regulators' need for this information and the reporting entities' compliance burden, we will make this data field optional.	Optional
201	Secondary transaction identifier	For internal client code, if applicable.	Subject to ISO message standard	✓	✓	✓	✓	✓	We would like to confirm with HKMA on the understanding that this data element is optional and is up reporting entities to decide if there is such a need to report this data element.	Taking into account the respondent's feedback and having considered that UTI will be used for linking and matching trades, we will make this data field optional.	Optional

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
202	Lower or only barrier  [Lower barrier level]*	To facilitate the reporting of strike values for barrier options, if applicable.  [For a barrier option, involving two barrier prices the predetermined lower price of an underlier at which the occurrence of a barrier event (e.g. knock-out) is determined.]*	Subject to ISO message standard  [ISO 20022: Option/Barrier Levels  • Char(3) Currencies included in ISO 4217 and Num(18,13) , if Barrier price notation = 1  • Num(11,10), if Barrier price notation = 3  • Any value (eg USD 6.39) expressed as 6.39, if Barrier price notation = 1. • Any value expressed as decimals (eg 0.021 instead of 2.1%), if Barrier price notation = 3.]*	✓	✓	✓	✓	✓	Only ASIC requires this. Propose for SFC and HKMA to not require.	We understand that this data field will be proposed in version 4 of the CDE Technical Guidance. This is an important data field about the knock-in / knock out feature of a barrier option and we will therefore mandate it.  We have updated the data element name, definition and format and allowable values to align with the draft in version 4 of the CDE Technical Guidance.  *The changes in square brackets are subject to the final conclusion to version 4 of the CDE Technical Guidance.	To be mandated
203	Upper barrier  [Upper barrier level]*	To facilitate the reporting of strike values for barrier options, if applicable.  [For a barrier option, involving two barrier prices the predetermined upper price of an underlier at which the occurrence of a barrier event (e.g. knock-out) is determined.]*	Subject to ISO message standard  ISO 20022: Option/Barrier Levels  • Char(3) Currencies included in ISO 4217 and Num(18,13) , if Barrier price notation = 1  • Num(11,10), if Barrier price notation = 3  • Any value (eg USD 6.39) expressed as 6.39, if Barrier price notation = 1. • Any value expressed as decimals (eg 0.021 instead of 2.1%), if Barrier price notation = 3.	✓	✓	✓	✓	✓	Only ASIC requires this under "upper barrier price" and "upper barrier price notation". Propose for SFC and HKMA to not require.	We understand that this data field will be proposed in version 4 of the CDE Technical Guidance. This is an important data field about the knock-in / knock out feature of a barrier option and we will therefore mandate it.  We have updated the data element name, definition and format and allowable values to align with the draft in version 4 of the CDE Technical Guidance.  *The changes in square brackets are subject to the final conclusion to version 4 of the CDE Technical Guidance.	To be mandated



Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
203A	[Single barrier level]*	[For a barrier option, involving only one barrier price the predetermined price of an underlier at which the occurrence of a barrier event (e.g. knock-out) is determined.]*	[ISO 20022: Option/Barrier Levels • Char(3) Currencies included in ISO 4217 and Num(18,13) , if Barrier price notation = 1 • Num(11,10), if Barrier price notation = 3 • Any value (eg USD 6.39) expressed as 6.39, if Barrier price notation = 1. • Any value expressed as decimals (eg 0.021 instead of 2.1%), if Barrier price notation = 3.]*	✓	✓	✓	✓	✓		We understand that version 4 of the CDE Technical Guidance will split #202 "Lower or only barrier" and #203 "Upper barrier" into 3 data fields, namely "Lower barrier level", "Upper barrier level" and "Single barrier level". Hence this data field will be mandated for completeness.  *The changes in square brackets are subject to the final conclusion to version 4 of the CDE Technical Guidance.	To be mandated
204	Business message identifier	An unique user file reference assigned by the Submitting Party on request file	Varchar(35)	✓	✓	✓	✓	✓	We would like to share our observation that this data element appears to be technical information which may already be covered as part of ISO standard. We would like to ask HKMA to consider to broadly include ISO validation rules such as mandatory fields and value formatting under ISO as a prerequisite.	We agree with the respondent that this data field is part of the ISO standard and is a system administrative data field. We will not mandate it but will keep it in the AIDG.	HKTR admin field

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
205	Message definition identifier	The Message Definition Identifier of the Business Message instance with which this Business Application Header instance is associated.	Varchar(35)  Allowable values are: auth.108.001.01_HKMAUG_DATMDA_1.0.0 auth.030.001.03_HKMAUG_DATTAR_1.0.0	✓	✓	✓	✓	✓	We would like to share our observation that this data element appears to be technical information which may already be also covered as part of ISO standard. We would like to ask HKMA to consider to broadly include ISO validation rules such as mandatory fields and value formatting under ISO as a prerequisite.	We agree with the respondent that this data field is part of the ISO standard and is a system administrative data field. We will not mandate it but will keep it in the AIDG.	HKTR admin field

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
206	Business service	To indicate whether the request is used for Reporting service.	Varchar(35)  Allowable values are: Trade Valuation	✓	✓	✓	✓	✓	<b>Comment (i)</b> We would like to share our observation that this data element appears to be technical information which may already be also covered as part of ISO standard. We would like to ask HKMA to consider to broadly include ISO validation rules such as mandatory fields and value formatting under ISO as a prerequisite. We would like to seek advice on the scenario that this data element will need to be populated. As per Appendix B, the allowable values are "trade" or "valuation" but as our members understand, trade and valuations are reported on different templates, and hence we do not foresee a "trade" business service reported on a valuations	We agree with the respondent that this data field is part of the ISO standard and is a system administrative data field. We will not mandate it but will keep it in the AIDG.	HKTR admin field

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
									<p>template and vice-versa. Further, we do not see "collateral" as an allowable value – we appreciate if this would mean that this field is not required on collateral reporting.</p> <p><b><u>Comment (ii)</u></b>  1. Where the reporting party is reporting trade details, we take note that we should select "trade" for this field. Does it mean that we should not report anything related to valuation and those valuation-related fields are to be reported separately and marked under "valuation"?</p> <p>2. Please clarify what the valuation-related fields are.</p>		

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
207	Creation date	<del>Date and time when this Business Message (header) was created.</del>	<del>ISO-8601 YYYY-MM-DDThh:mm:ssZ, based on UTC.</del>	✓	✓	✓	✓	✓	We would like to share our observation that this data element appears to be technical information which may already be also covered as part of ISO standard. We would like to ask HKMA to consider to broadly include ISO validation rules such as mandatory fields and value formatting under ISO as a prerequisite.	We agree with the respondent that this data field is part of the ISO standard and is a system administrative data field. We will not mandate it but will keep it in the AIDG.	HKTR admin field
208	Number records	<del>Indicates the number of trade action in the request file.</del>	<del>Num(4,0) Any value greater than zero.</del>	✓	✓	✓	✓	✓	We would like to share our observation that this data element appears to be technical information which may already be also covered as part of ISO standard. We would like to ask HKMA to consider to broadly include ISO validation rules such as mandatory fields and value formatting under ISO as a prerequisite.	We agree with the respondent that this data field is part of the ISO standard and is a system administrative data field. We will not mandate it but will keep it in the AIDG.	HKTR admin field

Row no.	Data Element Name	Definition of Data Element	Format and allowable values	IR	FX	EQ	CD	CM	Respondent's Comments	HKMA's and SFC's Responses	Requirement
209	Technical record identification	Unique identifier of a trade action used as part of error management and status advice message.	Varchar(140)	✓	✓	✓	✓	✓	We would like to share our observation that this data element appears to be technical information which may already be also covered as part of ISO standard. We would like to ask HKMA to consider to broadly include ISO validation rules such as mandatory fields and value formatting under ISO as a prerequisite.	We agree with the respondent that this data field is part of the ISO standard and is a system administrative data field. We will not mandate it but will keep it in the AIDG.	HKTR admin field