

Short Position Reporting – Frequently Asked Questions

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Important Notes

1. This document should be read together with the Securities and Futures (Short Position Reporting) Rules (**Rules**)¹, the Guidance Note on Short Position Reporting (**Guidance Note**), the Notes to the Reportable Short Position Form (**Notes**) and the Short Position Reporting Service User Guide (**User Guide**), all of which are available on the website of the Securities and Futures Commission (**SFC**)². Unless otherwise specified, the words and phrases used herein have the meanings given by the Rules, as appropriate.
2. In addition, there have been amendments to the Rules with effect from 15 March 2017. Please refer to “Consultation to expand the scope of short position reporting and on the corresponding amendments to the Securities and Futures (Short Position Reporting) Rules” published in November 2015³, and its corresponding Conclusions published in February 2016⁴. As a result of the amendments, some of the questions below have been revised or added⁵ accordingly.

¹ To view the Rules, please visit <https://www.elegislation.gov.hk/> and key in “571AJ” in the “Quick Search” box and press “Go To”.

² <http://www.sfc.hk/web/EN/regulatory-functions/market-infrastructure-and-trading/short-position-reporting/>

³ <http://www.sfc.hk/edistributionWeb/gateway/EN/consultation/openFile?refNo=15CP6>

⁴ <http://www.sfc.hk/edistributionWeb/gateway/EN/consultation/conclusion?refNo=15CP6>

⁵ These questions are B2, B3, B4, B5, B8, B9, B10, C3 and E3.

A. Who should report?

1. *Who has the legal responsibility to report?*

In general, the person who has the reportable short position has the duty to notify the SFC.

Trust

In cases where a reportable short position is held on trust, the Rules have provided that the trustee has the duty to notify the SFC of the short position.

Corporate “umbrella” funds

The Rules have provided that in determining whether a corporate umbrella fund has a reportable short position, the position that is attributable to each underlying sub-fund is to be treated separately and is not to be aggregated with the positions of other sub-funds within the same umbrella fund. This means that a corporate umbrella fund will have to report for each of the underlying sub-funds separately if their respective net short position hits the reporting threshold. Please see question D5 below on how to report.

Partnerships

The Rules have provided that if the partners in a partnership have a reportable short position, then a report submitted by a partner or another person authorized by all the partners of the partnership, on behalf of those partners, is regarded as having complied with the Rules. The Rules have also provided that a person who has a reportable short position as a partner in more than one partnership must report the short position attributable to each partnership separately. For more information on reporting, please see question DI in the “How to report” section.

However, in cases where a partnership which is legally regarded as a separate legal entity that is distinct from its partners in its domicile jurisdiction, the partnership may report the short position of the partnership. For details on reporting, please refer to question D1 in the “How to report” section.

For all of the above, please refer to the Rules. You may also wish to refer to paragraph 13 to 17 of the Consultation Conclusions and Further Consultation on the Securities and Futures (Short Position Reporting Rules)⁶ published in October 2011 (**2011 Conclusions**), and paragraph 12 to 15 and 17 of the Conclusions on Further Consultation on the Securities and Futures (Short Position Reporting) Rules⁷ published in February 2012 (**2012 Conclusions**).

2. *If a firm's current trading infrastructure has adopted any of the three approaches set out in The Guidance Note on Short Selling Reporting and Stock Lending Record Keeping Requirements⁸ for determining whether it has a presently exercisable and unconditional right to vest the securities in the purchaser of them for the purposes of section 170 and 171 of the Securities and Futures Ordinance, how should the firm determine when it has to report its short position to the SFC?*

The SFC considers that it is appropriate and makes good logical sense that the firm should apply the same approach for the purposes of reporting short positions to maintain overall consistency in the data provided by the firm in relation to its short sales and short positions. Please refer to the Guidance Note for details.

3. *Is agency reporting allowed?*

A person who has the statutory obligation to notify the SFC of a reportable short position under the Rules may authorize another person/party to do so on his *behalf*. Please refer to the *Notes to the Reportable Short Position Form – Registration* for more details and the *User Guide* for steps on how to report.

⁶ <http://www.sfc.hk/edistributionWeb/gateway/EN/consultation/conclusion?refNo=11CP3>

⁷ <http://www.sfc.hk/edistributionWeb/gateway/EN/consultation/conclusion?refNo=11CP7>

⁸ <http://www.sfc.hk/web/EN/rules-and-standards/codes-and-guidelines/guidelines/> paragraphs 8.1 and 8.2.

B. What should be reported?

1. *What details of the reportable short positions are required to be reported to the SFC?*

The SFC has prescribed template (in Comma Separated Value “CSV” format) as shown below to submit the relevant information. Please refer to the Notes for instructions on how to complete the template.

Short Position Reporting ID	Name	Stock code of the specified shares	Stock name of the specified shares	Reportable short position (No. of shares)	Net short position value

2. *Do I need to report my short positions in Designated Securities specified by the Stock Exchange of Hong Kong (SEHK)?*

Before 15 March 2017

Please note that the Rules only require reporting of short positions in specified shares defined in Schedule 1 of the Rules. Not all Designated Securities specified by the SEHK are subject to short position reporting. The current list of specified shares can be found on the SFC’s website.

With effect from 15 March 2017

The Rules require reporting of short positions in all Designated Securities which are determined by the SEHK. The list of Designated Securities can be found on the Hong Kong Exchanges and Clearing Limited’s (HKEX’s) website⁹.

⁹http://www.hkex.com.hk/services/trading/securities/securities-lists/designated-securities-eligible-for-short-selling?sc_lang=en

3. *Where can I find the list of specified shares subject to reporting?*

Before 15 March 2017

A list of specified shares with their respective stock code and name, in both PDF format and CSV format, is published on the SFC website¹⁰. This list may be downloaded for use.

With effect from 15 March 2017

A list of all Designated Securities is available on the HKEX's website¹¹. The list can be viewed online or downloaded in CSV format. The CSV file contains the stock code, stock short name, currency and the security type of a security (i.e. collective investment schemes or shares¹²) which may have a different reporting threshold.

4. *What is the reporting threshold?*

Before 15 March 2017

Pursuant to the Rules, a person who has a net short position in any of the specified shares that equals to or exceeds 0.02% of the market capitalization of the listed issuer concerned or HK\$30 million, whichever is lower, at the end of the last trading day of a week, has the obligation to report to the SFC. The person has to continue to report until his net short position falls below the reporting threshold.

With effect from 15 March 2017

The reporting threshold (i.e. 0.02% of the market capitalization of the listed issuer concerned or HK\$30 million, whichever is lower) will apply to all Designated Securities except collective investment schemes (**CISs**) which include Exchange Traded Funds (**ETFs**) and Real Estate Investment Trusts (**REITs**). For CISs, a person will have to report to the SFC if, as at the end of the last trading day of a week, he holds a net short position in a CIS which has a value that equals to or exceeds HK\$30 million.

¹⁰ <http://www.sfc.hk/web/EN/regulatory-functions/market-infrastructure-and-trading/short-position-reporting/>

¹¹ http://www.hkex.com.hk/services/trading/securities/securities-lists/designated-securities-eligible-for-short-selling?sc_lang=en

¹² Collective investment schemes and shares are referred to as "TRST" and "EQTY" in the CSV file respectively.

5. *How to find out if there is any change to the list of specified shares?*

Before 15 March 2017

The SFC uses its best endeavors to update the list of specified shares (**List**) and publishes the revised List on its website to reflect the latest change. In addition, an email notification regarding such a change will also be sent to subscribers to the Short Position Reporting Related Matters email alert service¹³ (**Email Alert Service**).

While the SFC maintains the List current on a best effort basis to facilitate market participants to prepare for their reporting, market participants should also monitor any changes to the list of specified shares.

With effect from 15 March 2017

The SFC will no longer publish a list of specified shares on its website and will stop sending email alerts regarding changes to the list of specified shares. Market participants are reminded to monitor any changes to the list of Designated Securities published on the HKEX's website¹⁴. There is a column of "Remarks" in the CSV file of the list of Designated Securities to show changes like addition of Designated Securities and change of name.

6. *How can I find out the number of shares issued by an individual corporation concerned?*

The information is provided by each individual listed corporation which can be found on the HKEX's website¹⁵. The information is also carried by some information vendors.

¹³ This service is available for subscription on SFC's website at:

<https://www.sfc.hk/CampaignHelper/campaignForm.jsp?lang=EN>

¹⁴ http://www.hkex.com.hk/services/trading/securities/securities-lists/designated-securities-eligible-for-short-selling?sc_lang=en

¹⁵ http://www.hkex.com.hk/Market-Data/Securities-Prices/Equities?sc_lang=en

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7. *Which closing price of the specified share is to be used for calculating the net short position value if the trading at the Stock Exchange of Hong Kong is suspended due to a black rainstorm warning or a tropical cyclone warning signal number 8 or above?*

If due to any of the above situations, the Stock Exchange is not opened for trading for the whole day, the closing price of the previous trading day should be used for calculating the net short position value.

8. *What if a specified share has two stock codes under parallel trading? Which stock code should be used for reporting?*

In the case of parallel trading with an original counter and a temporary counter, net short positions of the two counters should be aggregated and reported under the original stock counter. This is because only the original counter but not the temporary counter is on the list of specified shares published on the SFC website (prior to 15 March 2017) or on the list of Designated Securities published on the HKEX's website (with effect from 15 March 2017). Net short positions of the temporary counter should be converted into equivalent positions of the original counter before aggregation. The general principle is that the market value of your short positions holding should not be affected by the conversion process. To calculate the position value, the closing price of the original counter should be used as long as it is available. During the period when the trading of the original counter is suspended and its closing price is unavailable, the closing price of the temporary counter should be used instead.

9. *What if a specified share is denominated in currencies other than Hong Kong dollars (HKD)? Which currency should be used in calculating the position value and for reporting?*

HKD should be used in calculating whether the value of a short position reaches the reporting threshold of HK\$30 million. The closing price of a specified share expressed in a currency other than HKD (such as US dollars or Renminbi) should be first converted into HKD for the purposes of determining the value of a net short position. The exchange rate should be the buying rate for telegraphic transfers on the reporting day, as determined

by the Hong Kong Monetary Authority and it can be obtained from the HKEX's website¹⁶.

Please refer to below for examples of the closing price conversion of a stock. For avoidance of doubt, we expect the converted closing price is rounding off to 2 decimal points before calculating the short position value.

Stock Name	Trading currency	Closing price in trading currency on the reporting day	Exchange rate on the reporting day (RMB/HKD) or (USD/HKD)	Closing price in HKD rounding off to 2 decimal points
XYZ	RMB	8.77	1.1832	10.38
ABC	USD	3.13	7.7295	24.19

Furthermore, with regard to the short position of a specified share which is denominated in a currency other than HKD, the closing price of the specified share should be converted into HKD for reporting purposes.

10. How to report the short position of specified share with multiple trading counters? How to determine whether the reporting threshold is reached and which counter should be used for reporting?

With effect from 15 March 2017, the Rules require reporting of reportable short positions in all Designated Securities which are determined by the SEHK. Both the HKD and RMB counters of a security traded under the Dual Trench Dual Counter model are on the list of Designated Securities. To enhance market transparency, net short position of individual counters should be reported separately.

To determine whether and how the position of individual counters should be reported, a person should aggregate the positions (be it long or short) of all relevant counters which belong to the same security for the purpose of determining whether the aggregated short position reaches the reporting

¹⁶ http://www.hkex.com.hk/eng/market/sec_tradinfo/stampfx/stampfx.asp

threshold. In this connection, temporary counter (not on the list of Designated Security) or other counters traded in different currencies (on the list of Designated Security) should be taken into account.

For ETFs with multi-currency counters, it is expected that the net short position(s) of the counter(s) which attribute to the resulting aggregated short position should be reported. In other words, a person should (1) calculate the net short position of each counter by netting off the long positions of other counters of the same ETF; (2) identify the counter(s) which attribute to the aggregated short position; and (3) report the net position value(s) of that counter(s) separately.

Below are examples using ETFs based on the reporting threshold of HK\$30 million to illustrate the above guiding principles:

Example 1 – net short position values of individual counters are below the reporting threshold of HK\$30 million but their aggregated value exceeds the threshold. Hence, the positions of both counters need to be reported separately.

Stock code	Currency	Long (+)/short(-) positions (No. of shares)	Long (+)/short(-) position Values (HKD)	Need to report	Short Positions to report (No. of shares)	Short Positions values to report (HKD)
2828	HKD	-100,000	- 10 million	Yes	100,000	10 million
82828	RMB	-250,000	- 25 million	Yes	250,000	25 million
	Aggregated Value		- 35 million			

- Assuming the closing price of both HKD counter and RMB counter are HK\$100 after forex conversion.

Example 2 – net short position value of the RMB counter is above the reporting threshold of HK\$30 million but the aggregated value is below the threshold. Hence, no reporting is required for both counters.

Stock code	Currency	Long (+)/short(-) positions (No. of shares)	Long (+)/short(-) position Values (HKD)	Need to report	Short Positions to report (No. of shares)	Short Positions values to report (HKD)
2828	HKD	+100,000	+ 10 million	No	-	-
82828	RMB	-350,000	- 35 million	No	-	-
	Aggregated Value		- 25 million			

- Assuming the closing price of both HKD counter and RMB counter are HK\$100 after forex conversion

Example 3 – net short position value of the RMB counter is above the reporting threshold of HK\$30 million and the aggregated value is still above the threshold after taking into account the long position of the HKD counter. The aggregated value should be reported under the RMB counter in this case.

Stock code	Currency	Long (+)/short(-) positions (No. of shares)	Long (+)/short(-) position Values (HKD)	Need to report	Short Positions to report (No. of shares)	Short Positions values to report (HKD)
2828	HKD	+100,000	+ 10million	No	-	-
82828	RMB	-500,000	- 50 million	Yes	400,000	40 million
	Aggregated Value		- 40 million			

- Assuming the closing price of both HKD counter and RMB counter are HK\$100 after forex conversion

11. *Which financial instruments are subject to reporting under the Rules? Do they include bonds, over-the-counter derivatives, synthetic exposure to a share obtained through a derivative or exchange traded funds?*

You only need to report short positions in specified shares defined in Schedule 1 of the Rules. Derivatives of such shares are excluded for the purpose of reporting under the Rules.

12. *For shares that are dually listed on a Hong Kong exchange and a non-Hong Kong exchange, what is required to be reported under the Rules?*

Under the Rules, reporting of a “short position” is with respect to a position resulting from a short sale of the specified shares at or through SEHK or by means of an authorized automated trading services (**ATS**) specified in Schedule 2 of the Rules (currently, no such ATS is specified).

13. *When determining whether I have any reportable short positions, shall I base on the positions on trade day or settlement day?*

For the purpose of short position reporting, a short position is considered as created on the trade day.

14. *When I use market capitalization to determine whether my short position has reached or exceeded the reporting threshold, shall I include shares listed outside the SEHK, e.g. A-shares?*

Please note that the formula provided in Rule 3(2) (b) refers to the “total number of the specified shares issued by the corporation concerned” and “specified shares” means “shares in a corporation which are listed or admitted to trading on the Stock Exchange and specified in Schedule 1”. It

follows that shares that are not listed or admitted to trading on SEHK such as “A” shares should not be taken into account.

15. I have submitted short positions to the SFC before. Do I need to notify the SFC or make a nil submission when my short positions dropped below the reporting threshold or become zero?

The Rules only require reporting of short positions that reach or exceed the reporting threshold. There is no statutory obligation to report to the SFC if the positions subsequently fall below the reporting threshold or drop to zero on the next reporting day. However, reporting should resume if the short positions reach or cross the reporting threshold again.

C. When to report?

1. *What is the timing for reporting under normal situation?*

Please refer to the Rules and paragraphs 32-34 of the Consultation on Securities and Futures (Short Position Reporting) Rules published in May 2011¹⁷. In terms of the exact timing for reporting, for example, if the position was determined as at Friday, the reportable short positions must be filed by midnight of the following Tuesday (Hong Kong Time).

2. *What is the timing for daily reporting in contingency situations?*

Please refer to the Rules. The reportable short positions must be reported on or before the following business day in contingency situations.

3. *How do I know when daily reporting is required?*

Before 15 March 2017

Please refer to the Rules. The daily reporting requirement notice will be published in the Gazette at least 24 hours before it comes into effect. The SFC also intends to publish the notice on its website. On top of these, the SFC may use other means to raise public awareness such as an email sent via to subscribers to the Email Alert Service¹⁸.

With effect from 15 March 2017

As short position reporting is extended to cover all Designated Securities, to reduce the operational burdens, in contingency situations, the SFC will determine which specified shares that will be subject to daily reporting. The daily requirement notice, which also identifies the specified shares to be reported, will be published in the Gazette at least 24 hours before it comes into effect. Please note that, when daily reporting is required, weekly

¹⁷ <http://www.sfc.hk/edistributionWeb/gateway/EN/consultation/openFile?refNo=11CP3>

¹⁸ <https://www.sfc.hk/CampaignHelper/campaignForm.jsp?lang=EN>

reporting of reportable short positions of the remaining specified shares will still be in effect.

4. *Will the reporting deadline be adjusted if any of the two subsequent business days following the reporting day is affected by either a black rainstorm warning or a tropical cyclone warning signal number 8 or above?*

Under the Rules, a day which is affected by either a black rainstorm warning or a tropical cyclone warning signal number 8 or above will not be regarded as a “business day”. Consequently, the reporting deadline will be adjusted accordingly.

5. *Can I file the short position report later if the reporting deadline happens to be a public holiday in the market where I am based?*

The term “a public holiday” referred to in the definition of “business day” in the Rules means a public holiday in Hong Kong; the reporting deadline does not extend due to overseas public holidays. Filing made after the reporting deadline as required under the Rules will, without reasonable excuse, constitute a breach and failure to file because the reporting deadline falls on an overseas public holiday will not be regarded as a reasonable excuse.

D. How to report?

1. *How should I report my short position?*

First of all, you need to register through the Short Position Reporting Service (**SPRS**) to obtain a unique Short Position Reporting ID (**SPRID**). You can then prepare the short position report by referring to the template for reportable short position particulars in the Notes. Submission must be performed through the SPRS which is a web-based system. To submit the report, you must first need to provide your SPRID and name for authentication and then upload your short position report. Acknowledgement will be provided upon successful submission. Please refer to the User Guide for details.

In the case of reporting for partnership, both the partnership and the partner or person authorized by all the partners of the partnership should have their own SPRID for reporting. It is expected that the SPRID of the partnership and its short position details will be provided in the report template whereas the SPRID and name of the authorized person will be provided when performing the submission.

The Notes have provided for the particulars (name, address and contact information) of all partners in a partnership to be furnished at registration for a SPRID and the requirement to register for a new SPRID if any of the particulars provided at registration changes. The list of partners and their particulars is expected to be kept up-to-date.

Based on recent feedback from some market participants, the SFC was made aware that the requirements to provide the particulars of all the partners (and to update the list regularly) and to obtain a new SPRID as and when there is a change in the partners' list in a timely manner may pose practical difficulties in compliance for partnerships that have a large number of partners.

To address these compliance concerns, henceforth, the SFC will not mandate the list of partners and their particulars to be provided at registration. That said, the SFC would accept if such information is

volunteered. Given that the list of partners is no longer required at registration, it will also mean that the partnership does not have to be concerned with registering for new SPRID due to any changes in the list. However, the partner or the person authorized by the partners to report on their behalf will still be required to register for a new SPRID if any of its particulars provided at registration changes. In terms of reporting, the partner/ authorized person will, at registration for a SPRID, indicate in the “Remarks” box that it will be reporting as the partner or the person authorized to do so, on behalf of the partners in the partnership.

In instances where a partnership (which has a separate legal personality) is reporting its short position, the partnership will have to register for a SPRID. Likewise, it does not have to furnish a list of the partners in the partnership and their particulars at registration. The SFC would however accept the information if the partnership may nevertheless wish to volunteer the list. Similarly, the partnership need not register for a new SPRID following any changes in its constituent partners or any of its partners’ particulars. For reporting, the partnership should indicate, at registration for a SPRID, in the “Remarks” box its place of domicile and state that the partnership will be reporting the short position of the partnership.

It must be emphasized that the above reporting arrangements are subject to the proviso that a full and complete list of partners must be provided upon SFC’s request. It should also be noted that the above arrangements are to address the practical issues in reporting; they do not diminish the legal responsibility of those who are required to report under the Rules.

The SFC will monitor the reporting by partnerships and assess whether the information thus provided is sufficient for our regulatory purposes, and we may reinstate the information requirement in relation to partners in a partnership if our assessment concludes that this is necessary.

2. *Do I need to register if I am an existing SFC licensee?*

All persons with reporting obligations and their reporting agents, including those who are SFC licensees, are required to register through the SPRS to obtain a unique SPRID before submitting any short positions for themselves or on behalf of other parties. Please refer to the User Guide for details.

3. *Can I amend or withdraw the submitted information on reportable short position?*

Once the Reportable Short Position Form (**Form**) is submitted, it cannot be amended or withdrawn. You have to re-submit another Form to correct any inaccurate information. You should provide (i) the reason(s) for re-submission and (ii) the previous submission reference number in the submission remarks of re-submission. Please refer to the User Guide for details.

4. *How do I know if I have successfully submitted my report through the internet? Can I view the details after submission?*

Immediately after a short position form has been successfully submitted through the SPRS, an acknowledgment of receipt will appear on screen which can be downloaded for saving or printed. Besides the on-screen submission acknowledgement, a submission acknowledgement email will be sent to the primary contact person provided at registration and, if applicable, to the primary contact person provided in the Form.

5. *Under the Rules, a corporation that has a short position attributable to more than collective investment scheme (CIS) is required to treat the positions of each CIS separately and report the net short position of each CIS if it hits the threshold level. How should the corporation report in such a scenario?*

For illustration purpose, say, corporate XYZ has three CISs namely, Fund A, Fund B and Fund C, which have the following positions in stock HK123, (stock code xxx).

Fund A – 200 shares net short

Fund B – 100 shares net short

Fund C – 200 shares net long

Under the Rules, XYZ is required to treat and report the positions of Funds A, B and C separately (please refer to the above question A1 – Corporate “umbrella” funds). That is to say, XYZ has the duty to report to the SFC the net short position of Funds A and B if their respective net short position triggers the reporting threshold. However, XYZ is not required to report the long position of Fund C.

Assuming that XYZ has to report the short position of Fund A and Fund B, Fund A and Fund B will have to register separately for a SPRID and corporate XYZ will have to report the positions as two separate entries on the CSV report template as illustrated below (assuming closing price is HK\$10):

Short Position Reporting ID	Name	Stock code of the specified shares	Stock name of the specified shares	Reportable short position (No. of shares)	Net short position value
SPRID of Fund A	Fund A	xxx	HK123	200	2000
SPRID of Fund B	Fund B	xxx	HK123	100	1000

6. *Do I need to inform the SFC if I have changed the contact information provided at registration for a SPRID?*

Yes. As explained in the Notes, if any of the particulars (including contact details) provided at registration for a SPRID changes, the person must update the particulars by re-registering to obtain a new SPRID. **Your old SPRID will be invalidated** and the newly assigned SPRID will have to be cited on the Reportable Short Position Form in place of the old one in future reporting. To avoid missing relevant email from the SFC due to the absence of a particular person, we noted that some registrants provided a group email address as the contact email.

Please note that under the Securities and Futures Ordinance, to comply with the reporting requirement under the Rules, you also need to ensure compliance with the Notes, which are directions and instructions included in the Form.

E. Others

1. *What details of the reported short positions will be published to the public?*

The SFC publishes aggregated short positions for each stock, on an anonymous basis. This data is typically published on the SFC's website three business days after the receipt of the short position reports.

2. *What if SFC's reporting service breaks down and not available for submission?*

If the SFC's reporting service is unavailable, a message will be displayed on the website and notification emails will be sent to all Email Alert Service subscribers as soon as practicable. They will be notified again when the service resumes normal.

3. *Where can I get updated information relating to the short position reporting?*

Before 15 March 2017

You can subscribe to our Email Alert Service¹⁹. Through this service, subscribers will receive email alerts of the latest developments in relation to the short position reporting regime.

With effect from 15 March 2017

The SFC will continue to send email alerts about the latest developments in relation to the short position reporting regime except changes to the list of specified shares. Market participants are reminded to monitor any changes to the list of Designated Securities published on the HKEX's website²⁰.

¹⁹<https://www.sfc.hk/CampaignHelper/campaignForm.jsp?lang=EN>

²⁰http://www.hkex.com.hk/services/trading/securities/securities-lists/designated-securities-eligible-for-short-selling?sc_lang=en

4. *Where can I send my enquiries to if I encounter technical problems with the SPRS?*

Enquiries related to SPRS technical problems may be directed to shortpositions@sfc.hk.

Market participants who have questions regarding requirements under the Rules are strongly encouraged to review the Rules, the past public consultation and consultation conclusions papers relating to short position reporting posted on SFC's website and the Guidance Notes, and if necessary, consult their compliance officer or legal adviser.