

23 July 2014

By mail, fax, online, and email

The Securities and Futures Commission
 35/F Cheung Kong Center
 2 Queen's Road Central
 Hong Kong

Dear Sirs,

Consultation paper on the proposals to amend publication requirements relating to offer and redemption prices or net asset value, and notices of dealing suspension under the Code on Unit Trusts and Mutual Funds (the "Consultation Paper")

We refer to the Consultation Paper issued by the Securities and Futures Commission (the "Commission") on 24 June 2014 inviting market participants and interested parties to submit written comments on the proposals set out in the Consultation Paper.

We have set out below our responses to the Commission's questions as set out in the Consultation Paper for your consideration. Unless otherwise defined in this submission, all defined terms shall have the same meaning as set out in the Consultation Paper.

Questions	Responses
<p>Question 1 - Do you agree that Schemes should be allowed to make public their Prices or NAVs in any appropriate manner?</p>	<p>We agree that Schemes should be allowed to make public their Prices or NAVs in any appropriate manners. However, we suggest that all Schemes should have in place contingency plans to address the situations where the manner selected by the Schemes to publish their Prices or NAVs is not available for any reasons.</p> <p>In addition, we understand that the Schemes are currently paying for the costs for publishing the Prices or NAVs to the newspaper publishers. As such, this recommended change would allow the Schemes to reduce its costs and hence would be interest of the investors.</p>
<p>Question 2 - Do you agree that Schemes should be required to make public their Prices or NAVs on every dealing day?</p>	<p>In respect of any Schemes which offer dealing on a daily basis, we agree that such Schemes should be required to make public their Prices or NAVs on every dealing day.</p>
<p>Question 3 - Do you agree that Schemes should be allowed to publish notices of dealing suspension in any appropriate manner?</p>	<p>We agree that Schemes should be allowed to publish notices of dealing suspension in any appropriate manners. However, we suggest that the manners in which the notices of dealing</p>

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	suspension are being published should be the same as the manners in which the Prices and NAVs of the Schemes are published.
Question 4 - Do you agree that the proposed implementation timeline is acceptable and practicable, taking into account the needs and circumstances of various stakeholders?	Unless the Commission is willing to waive any approval requirements for amending the Scheme's constitutive documents, offering documents, and potentially, notice to investors setting out the changes due to this amendment, we recommend that the transitional period should be extended to 12 months for Existing Schemes.

We would appreciate if the Commission could consider our suggestions set out above.

Yours sincerely,
For and on behalf of
HSBC Institutional Trust Services (Asia) Limited
滙豐機構信託服務(亞洲)有限公司