



## HKEX Overhauls Listing Rules' Chapter 15A on Structured Products

The Stock Exchange of Hong Kong Limited (“**HKEX**”) published its Consultation Conclusions on Review of Chapter 15A – Structured Products (the “**Structured Product Consultation Conclusions**”) in April 2026 setting out the amendments to the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited (the “**HKEX Listing Rules**”) following the public consultation on the proposals included in the HKEX’s Consultation Paper on Review of Chapter 15A – Structured Products published on 30 September 2025 (the “**Structured Product Consultation Paper**”).

The HKEX will adopt all of the proposals set out in the Structured Product Consultation Paper, subject to certain modifications and clarifications. The changes represent the most extensive overhaul of the structured products listing regime in many years, touching on issuer eligibility, liquidity provision, product terms, documentation, disclosure obligations and the scope of HKEX’s regulatory oversight.

### Implementation Timetable: Two Effective Dates

HKEX will implement the HKEX Listing Rule amendments in two tranches. This approach is intended to facilitate the earlier introduction of measures that enjoy strong market support and to allow issuers, guarantors and market participants adequate time to update listing documents and implement any necessary system enhancements in respect of the remaining amendments.

Implementation Date	Listing Rule Provisions
1 May 2026	Key Product Requirements (minimum issue prices, minimum market capitalisation, Emulation Issue product terms)
1 July 2026	All other HKEX Listing Rule amendments (issuer eligibility, liquidity provision, documentation, disclosure obligations, other rule changes)

Structured products with a Launch Date falling on or after 1 May 2026 must be issued in accordance with the updated Product Sheets for each product type, which HKEX will publish at the same time as the amendments come into force.

## Amendments Aimed at Increasing Market Competitiveness

### Lower Minimum Issue Prices for Derivative Warrants and Callable Bull/Bear Contracts

HKEX will lower the minimum issue price for derivative warrants (“**DWs**”) from HK\$0.25 to HK\$0.15, and remove the minimum issue price requirement entirely for callable bull/bear contracts (“**CBBCs**”).

The removal of the minimum issue price for CBBCs reflects the nature of these products, which trade close to their residual value. Issuers should note that, even where no contractual minimum applies, no CBBC may be issued below HK\$0.01, being the minimum trading price on HKEX’s systems.

As a related amendment, the prescriptive minimum issue price requirement for Emulation Issues will also be removed from the HKEX Listing Rules. Both the minimum issue price and the minimum for Emulation Issues will instead be published in the updated Product Sheets for the relevant product type.

### Reduced Minimum Market Capitalisation at Issue

Consistent with the reduction in minimum issue prices, the minimum market capitalisation at issue for both DWs and CBBCs will be lowered from HK\$10 million to HK\$6 million. HKEX considers this change sufficient to ensure an adequate supply of products at issue to meet investor demand, while providing issuers with greater flexibility in determining issue size.

### Emulation Issues: Identical Product Terms Required

Emulation Issues are structured products issued with substantially identical product terms to an existing listed product. HKEX will require an Emulation Issue to have product terms (other than issue price and issue size) that are identical in all respects to those of the emulated issue. This is intended to facilitate price comparison between Emulation Issues and existing issues, and to deter price anomalies caused by short supply.

### New Entitlement Ratios for DWs and CBBCs (Effective 1 July 2026)

HKEX will add new permitted entitlement ratios for DWs and CBBCs, in addition to the existing ratios of 1:1, 5:1, 10:1, 50:1, 100:1 and 500:1 for each share. The new ratios will allow issue of two, eight, 20, 80, 200, 800 and 1,000 structured products for one share, and thereafter in multiples of 500. These additional ratios aim to provide issuers with greater flexibility to issue products aligned with investor demand and prevailing market prices.

### ETF Eligibility: AUM-Based Threshold (Effective 1 July 2026)

Currently, eligibility of exchange traded funds (“**ETFs**”) as underlying securities for structured products is assessed by reference to public float capitalisation. Under the revised HKEX Listing Rules, HKEX will instead assess eligibility by reference to assets under management (“**AUM**”), which it considers a more appropriate and relevant measure for ETFs. The minimum AUM threshold over the 60-day Qualifying Period will be set at HK\$1 billion (compared with the current public float capitalisation threshold of HK\$4 billion).

The change reflects the fact that ETF liquidity is supported by market makers and by the creation and redemption of units by participating dealers, making AUM a more meaningful indicator of an ETF’s market significance.

### Product Terms Requirements: Removal of Prescriptive Rules (Effective 1 July 2026)

The prescriptive product terms currently set out in the HKEX Listing Rules (the “**Prescriptive Product Terms**”) will be deleted. Instead, issuers will be required to comply with the permitted product terms for each product type as published by the HKEX from time to time in its Product Sheets. HKEX will engage with issuers before implementing any changes to the product terms and will publish updated Product Sheets with sufficient notice of the expected effective dates.

### Settlement by Delivery: Expanded Electronic Transfer Options (Effective 1 July 2026)

Where structured products may be settled by delivery of underlying securities or assets, the terms and conditions will be permitted to provide for electronic transfer through settlement platforms other than the Central Clearing and Settlement System (“**CCASS**”), subject to those alternative platforms receiving HKEX’s prior approval. HKEX will engage with issuers before approving any new settlement platforms.

# HKEX Listing Rule Amendments Aimed at Improving Market Quality and Investor Protection (Effective 1 July 2026)

## New Issuer Eligibility Requirements: NAV, Regulated Entity Status and Credit Rating

This section contains the most significant changes in the entire package of amendments. HKEX will impose three cumulative eligibility requirements on issuers of non-collateralised structured products (each of which may alternatively be satisfied by a guarantor in the case of guaranteed issues):

- **Minimum net asset value (“NAV”):** The minimum NAV (being total shareholders’ equity, i.e. the aggregate of share capital and reserves) will be increased from HK\$2 billion to HK\$5 billion, as set out in the issuer’s latest published audited and interim financial statements.
- **Regulated Entity requirement:** Issuers must be regulated by the SFC for dealing in securities in Hong Kong, the HKMA, or another regulatory authority acceptable to HKEX. The previous distinction between SFC-regulated entities, HKMA-regulated entities and government or government-backed entities is removed, and all issuers of non-collateralised structured products will be required to satisfy this requirement without exception.
- **Credit rating requirement:** Issuers must hold investment grade credit ratings awarded by all credit rating agencies from which they have sought a credit rating. A rating that is investment grade but under review for possible downgrading will not satisfy this requirement.

Where an issuer cannot satisfy any of the three requirements in its own right, it may instead issue guaranteed issues, provided the guarantor satisfies all three requirements. Additionally, an eligible issuer may issue guaranteed issues where the guarantor also satisfies all three requirements; in such cases, each of the issuer and the guarantor will be required to comply individually with the HKEX Listing Rules to the extent those rules apply to each of them respectively.

HKEX has modified the proposed HKEX Listing Rule amendments to clarify that the word “overseas” has been removed from the description of acceptable regulatory authorities, so as to avoid unintended geographic limitations. Any regulatory authority, whether within or outside Hong Kong, may be relied upon, subject to the HKEX’s assessment of its acceptability. HKEX will publish on its website the list of regulatory authorities that it will accept.

## Credit Rating: Chain of Reliance and Disclosure Requirements

The required credit rating may be obtained by the issuer itself, or (where the issuer is unrated) by any of its holding companies. In the case of guaranteed issues, the rating may be obtained by the guarantor, by the issuer (where the guarantor is unrated), or by any of the guarantor’s or issuer’s holding companies in the order set out in the amended HKEX Listing Rules.

Where credit ratings of a holding company are relied upon for eligibility assessment, the relevant listing documents must include the following additional disclosures:

- a statement that the credit ratings are for investors’ reference only;
- identification of the holding company relied upon and a description of its relationship with the issuer and (where applicable) the guarantor; and
- a statement that investors have no recourse against the holding company, and that investors must determine for themselves the relevance and significance of the holding company’s credit ratings.

## Continuing Obligation to Comply with HKEX Listing Rules’ Eligibility Requirements

Issuers and guarantors will be subject to continuing obligations, while any of their structured products are listed on the HKEX, to comply with the credit rating requirement and the Regulated Entity requirement (in addition to the existing continuing obligation to maintain the minimum NAV). The HKEX will assess ongoing compliance with the eligibility requirements and will also assess an issuer’s performance in issuing and managing structured products, including liquidity provision.

## 12-Month Transitional Period for Existing Issuers and Guarantors

**Key Transitional Provision:** Existing issuers and guarantors with non-collateralised structured products listed on the HKEX, or a valid base listing document, as at 30 June 2026 will have until 30 June 2027 to comply with the New Eligibility Requirements (comprising the new NAV, Regulated Entity and credit rating requirements, together with related disclosure requirements and ongoing obligations).

Any new applicant who applies to become an eligible issuer on or after 1 July 2026 must comply fully with the New Eligibility Requirements from the outset and will not benefit from the transitional period.

During the transitional period, existing issuers and guarantors that are in the process of complying with the New Eligibility Requirements will continue to be subject to the existing eligibility obligations under the HKEX Listing Rules. The date on which an issuer or guarantor publishes a revised listing document complying with the New Eligibility Requirements will be treated as the date from which that party has complied, and the transitional period will cease to apply to that party from that date onwards.

To demonstrate compliance, existing issuers and guarantors are expected to:

- provide the HKEX with the latest audited and interim financial statements showing the required minimum total shareholders' equity of HK\$5 billion;
- submit evidence of the regulatory status relied upon; and
- submit to the HKEX for review the relevant credit rating reports, group structure chart, guarantee and legal opinion or other supporting documents evidencing satisfaction of the credit rating requirement, and then revise their listing documents accordingly (whether by issuing a new base listing document, addendums, or an SLD upon each product issuance).

### **Relationship between Issuer and Guarantor**

The HKEX will clarify in the HKEX Listing Rules that, in addition to the existing position whereby the guarantor will normally be the ultimate holding company of the issuer's group, HKEX may accept other group companies (being any of the issuer's holding companies, subsidiaries and fellow subsidiaries) to act as guarantor, taking into account the circumstances of the issuer and/or the guarantor.

### **Liquidity Provision: Deletion of 20-Board-Lot Requirement and New Service Level Obligations**

The current requirement to provide liquidity for at least 20 board lots of structured products will be deleted from the HKEX Listing Rules. In its place, the HKEX will:

- mandate that the minimum service levels for liquidity provision specified in listing documents comply with minimum service levels published by HKEX from time to time (currently set out in the Product Sheets); and
- impose a specific obligation in the HKEX Listing Rules on issuers to comply with the minimum service levels for liquidity provision as specified in their listing documents.

As a related housekeeping change, HKEX will remove the exemption from the requirement to provide liquidity during the first five minutes after HKEX has opened for trading (which currently appears as a note in Appendix D1D), since this is already dealt with in the Product Sheets.

The Industry Principles on Liquidity Provision will be removed from the HKEX's website and the relevant principles (including minimum service levels) will be incorporated into the Product Sheets and FAQs instead. The HKEX will continue to consult issuers before making any changes to the liquidity provision requirements.

### **Publication of Interim Financial Reports: Shortened Deadline**

The deadline for publication of interim financial reports after the relevant interim period end will be shortened from four months to three months. The HKEX notes that existing issuers and guarantors have in practice already been publishing interim financial reports within three months.

### **Mandatory Consolidated Financial Statements**

Issuers and guarantors that have subsidiaries will be required to publish consolidated financial statements in their annual reports and interim reports. HKEX has modified the original proposal to clarify that, where an issuer

or a guarantor is itself a holding company, it will only be required to publish its consolidated financial statements and will not be required also to publish its own (unconsolidated) financial statements. This modification applies equally to the content requirements for listing documents.

## **Expanded Continuing Disclosure and Notification Obligations**

The amendments introduce a significant expansion of issuers' and guarantors' obligations to disclose information to the public and to notify HKEX. The key changes are as follows:

Issuers and guarantors must now inform HKEX and announce (not merely notify HKEX) as soon as practicable upon the occurrence of a range of events, including:

- any proposed alteration of the memorandum or articles of association affecting the rights of holders;
- any change in the rights attaching to structured products;
- any change in auditors, registered address or registered place of business in Hong Kong;
- any change in NAV falling below the minimum required for issuer eligibility;
- any proposed change in capital structure; and
- any change in general character or nature of business (subject to existing materiality qualifiers).

Issuers must also publish trading reports on the HKEX's website instead of reporting to the HKEX internally. The requirement to publish pre-listing trading reports (where there are pre-listing transactions) remains unchanged.

## **Credit Rating Downgrades and Rating Outlook Downgrades**

A key modification to the original proposal relates to credit rating changes. Rather than requiring disclosure of any change in credit rating, issuers and guarantors will be required to inform the HKEX and announce as soon as practicable any downgrade (rather than any change) in their credit rating as disclosed in the listing documents, including any downgrade in their rating outlook. The same obligation applies where credit ratings of a holding company are relied upon for eligibility assessment, in which case any downgrade in the rating or rating outlook of that holding company must also be announced.

Separately, a continuing obligation to inform HKEX (but not necessarily to announce publicly) where there has been any change (as opposed to only a downgrade) in credit rating will be maintained.

## **Obligations on Regulatory Status Changes**

Issuers and guarantors must inform the HKEX and announce as soon as practicable any change in the regulatory status of the issuer or guarantor that is relied upon for fulfilling the Regulated Entity requirement as disclosed in the listing documents. The original proposal has been narrowed to apply only to the regulatory status specifically relied upon for eligibility purposes, rather than all regulatory licences of an internationally active institution.

## **Liquidity Provider Changes and Disruptions**

Issuers must:

- announce any change in liquidity provider or their particulars (such as broker identification number or contact information) before implementing such a change (in addition to notifying the HKEX); and
- inform the HKEX and announce as soon as practicable upon any disruption to, or resumption of, liquidity provision services.

The obligation to announce a disruption will not be triggered by a liquidity provider temporarily using a different broker identification number due to technical issues (which is not considered a change of liquidity provider). HKEX will update its FAQs to provide guidance on the announcement requirements.

## **Winding Up and Liquidation**

Issuers and guarantors must now announce, in addition to informing HKEX, events relating to their own winding

up and liquidation (including appointment of receivers, winding up petitions, resolutions to wind up, entry into possession by mortgagees and final judgments affecting their assets) as well as equivalent events occurring in relation to their respective holding companies.

## **HKEX's Ongoing Assessment and Regulatory Powers**

The amendments will codify and expand HKEX's regulatory powers in the following respects:

- In assessing an issuer's suitability or capability, HKEX may have regard, where appropriate, to the previous experience, risk management systems and procedures, and relevant experience of not only the issuer itself but also its group members.
- HKEX may impose restrictions and conditions on the issue of structured products linked to any eligible underlying assets, whether or not those assets are newly introduced.
- HKEX may require an issuer to withdraw the listing of existing products that are held entirely by the issuer or members of its group (including holding companies, subsidiaries, fellow subsidiaries and associated companies).
- HKEX may impose additional requirements or conditions on issue where, in its opinion, there has been an adverse change in the financial circumstances of the issuer, guarantor or their holding companies relied upon for credit rating eligibility, where the issuer has failed to properly issue and manage structured products, or where the issuer is applying to list a new type of structured product.
- Appointment of a liquidity provider that is not a member of the issuer's group requires HKEX's prior approval.
- HKEX will assess both ongoing compliance with eligibility requirements and an issuer's performance in issuing and managing structured products.

## **HKEX Listing Rule Amendments to Increase Market Efficiency (Effective 1 July 2026)**

### **Abolition of the Launch Announcement Requirement**

The requirement to publish a formal Launch Announcement will be removed. The prescribed particulars currently required in a Launch Announcement will be consolidated into the disclosure requirements for standalone listing documents and supplemental listing documents ("**SLDs**"), as set out in Appendix D1D to the HKEX Listing Rules. A standalone listing document or an SLD must be published as soon as practicable after the Launch Date, once HKEX has confirmed it has no comments, and no later than the first business day following the Launch Date. The headline categories for Launch Announcements on HKEX's e-Submission System will be removed.

Related to this, the requirement to disclose implied volatility, gearing, effective gearing, premium and yield in Launch Announcements (and in SLDs) will be repealed, as these values reflect market conditions at the Launch Date and may have changed materially by the listing date.

### **Simplified SLDs for Further Issues**

In relation to Further Issues (i.e. additional issuances forming a single series with an existing listed structured product) where the existing issue is non-collateralised and issued pursuant to a base listing document, issuers will be permitted to publish simplified SLDs. Where the information contained in the SLD for the existing issue remains the same, issuers will not be required to reproduce such information in the SLD for the Further Issue (save for the "General Information" and "Other information" sections of Appendix D1D).

The simplified SLD for a Further Issue must contain the following:

- the "General Information" and "Other information" disclosures;
- any update to the information in the existing listing documents;
- the number of units of the Further Issue to be issued;
- the closing price of the existing issue on the Launch Date (or the preceding trading day if launched before the close of trading);

- web links to the base listing document, any supplementary listing document and the SLD for the existing issue;
- a statement that the Further Issue forms a single series with the existing issue;
- a statement that the SLD for the Further Issue is to be read together with the earlier listing documents; and
- a declaration by the issuer that the information contained in the base listing document (as supplemented) is, at the date of the Further Issue SLD, up-to-date, true, accurate and complete in all material respects.

Issuers (but not guarantors) must apply for the listing of Further Issues. HKEX will provide an updated template checklist for the content requirements of SLDs for Further Issues.

### **Index Information Disclosure: New Exemption and Removal of HSI Carve-Out**

Issuers will be permitted to omit Index Information from listing documents where: (i) such information is publicly available in English and Chinese on the index compiler's website; and (ii) a web link to that website is included in the listing document. The specific existing exemption for the Hang Seng Index ("**HSI**") will be removed, as the HSI and any other qualifying index will benefit from the general exemption. HKEX does not intend to publish a prescribed list of indices that qualify for exemption.

### **Offering of Incentives by Securities Dealers**

The regime governing incentives offered by issuers and their group companies will be updated. Under the amended HKEX Listing Rules:

- issuers that are also securities dealers (and members of the issuer's group that are securities dealers) may offer incentives to customers subject to specified safeguards;
- where incentives relate to specific structured products, they must take the form of fee discounts only;
- where incentives relate to structured products generally or to securities trading generally, the terms of any incentive applicable to the issuer's structured products must be identical to those applicable to other issuers' structured products;
- the relevant listing documents and publicity materials must include disclosures alerting investors to the existence of the incentives and stating that investment decisions should be made without regard to any such incentives; and
- the issuer's group is clarified to mean any of the issuer's holding companies, subsidiaries and fellow subsidiaries (replacing the previous reference to "close associates").

## **Other HKEX Listing Rule Changes (Effective 1 July 2026)**

### **Revised Definition of Structured Product**

The definition of "structured product" will be updated to cross-refer to the meaning given in the Securities and Futures Ordinance ("**SFO**") as amended from time to time, instead of containing a standalone description within the HKEX Listing Rules. This is intended to ensure consistency across regulatory frameworks and to reinforce the fact that listed structured products are subject to the SFO.

### **Authorised Representatives: Senior Officer Requirement**

The current requirement that one of an issuer's two authorised representatives must be a director will be replaced by a requirement that one authorised representative must be a senior officer of the issuer, the guarantor (if any) or a member of their respective group (including any holding company, subsidiary or fellow subsidiary), provided that he or she is closely involved in the Hong Kong structured products business.

The HKEX will provide further guidance in FAQs on the eligibility of authorised representatives and expects such individuals to hold a high-level position with significant responsibility or to be accountable for regulated activities. Issuers will be required to declare in the issuer eligibility checklist and the annual assessment form that their authorised representatives satisfy these criteria.

## **Legal Opinions: Extended Requirements and Flexibility on Timing**

A number of changes have been made to the legal opinion requirements:

### **Legal Opinions for Guaranteed Issues**

Legal opinions in respect of guaranteed issues must now confirm, in addition to the existing matters:

- the guarantee or other security is enforceable in accordance with its terms;
- the guarantee or other security is issued in conformity with the laws of the place of the guarantor's incorporation and the guarantor's constitutional documents, and all necessary authorisations have been duly given;
- the guarantor's liability will not be affected in the case of administration or analogous action of the issuer; and
- the guarantor is duly incorporated or established under the laws of its place of incorporation.

Importantly, the HKEX has modified the HKEX Listing Rules to clarify that a guarantee may cover structured products issued one year or more from the date of the guarantee pursuant to the relevant base listing document, provided the guarantee is properly executed and remains legally enforceable. Annual legal opinions will still be required as part of the base listing document update.

### **Legal Opinions for Structured Product Issuers**

Issuers will be required to submit legal opinions to the HKEX confirming:

- the obligations of the issuer under the structured products are legal, valid, binding and enforceable;
- the structured products are issued in conformity with the issuer's constitutional documents and applicable laws, and all necessary authorisations have been given;
- the issuer is duly incorporated or established; and
- such other matters as HKEX may require depending on the circumstances of the issuer.

### **Legal Opinions for Collateralised Issues**

Legal opinions for collateralised issues must additionally confirm the validity and enforceability of the proposed trust or other security arrangements, and that all necessary authorisations have been duly given. HKEX may require legal opinions in respect of individual issues under a collateralised programme on a case-by-case basis.

### **Timing of Legal Opinions**

The HKEX has modified the original proposal to remove the requirement that draft legal opinions must be submitted at the time of the first draft of the base or stand alone listing document. Instead, draft legal opinions must be submitted as soon as practicable (without a prescribed timeline), although HKEX expects them to be submitted as early as possible to allow sufficient review time. Final legal opinions must be submitted on the date of publication of the relevant base or standalone listing document.

### **Consolidation of Continuing Obligations into Appendix E5**

All continuing obligations currently set out in Chapter 15A of the HKEX Listing Rules will be moved to and consolidated in Appendix E5 to the HKEX Listing Rules. This reorganisation is intended to make it easier for issuers, guarantors and other market participants to identify and refer to the full set of continuing obligations in one place. The substantive obligations themselves are unchanged.

### **Suitability Factors for Overseas Stocks and Other Assets**

The current list of general factors for considering the suitability of structured products linked to overseas stocks will be deleted from the HKEX Listing Rules and moved to the HKEX's [Guide on Product Review and Approval Process for Listed Structured Products](#) (the "New Product Guide"). The HKEX Listing Rules will instead state that HKEX

will specify the relevant factors from time to time.

## **Announcements and Listing Documents: Procedural Changes**

A number of procedural changes will be made to improve efficiency:

- References to “advertisements” will be removed from the HKEX Listing Rules. Issuers will instead be required to agree trading arrangements in advance with the HKEX, removing the previous requirement to submit draft trading arrangement announcements for clearance before publication.
- Issuers will be permitted (but not required) to publish announcements during trading hours in respect of disruptions or resumptions of liquidity provision services, and the expiry of CBBCs due to mandatory call events (“**MCEs**”).
- MCE announcements must include both the time of the MCE and the residual value (where applicable), and must be published as soon as practicable after the MCE.
- Announcements relating to suspension periods affecting the exercise rights of holders must contain details of the commencement and (if known) the end of the suspension, as well as how the suspension period will affect those exercise rights.
- Listing documents must be published as soon as practicable after HKEX confirms it has no comments.
- Standalone listing documents must be displayed on HKEX’s website for so long as any structured products issued under them remain listed.

## **Language Requirements for Documents**

Issuers will be required to publish directors’ reports, annual accounts, interim reports, quarterly financial reports, circulars to holders, base listing documents, SLDs and subsequent amendments to listing documents in both English and Chinese. This requirement reflects the fact that both English and Chinese are official languages in Hong Kong and is not intended to expand the scope of information currently being provided to investors in practice.

## **Alignment of Requirements for Issuers and Guarantors**

Several amendments are made to align the requirements applicable to guarantors with those applicable to issuers. These include:

- guarantors must be duly incorporated or established under the laws of their place of incorporation and must be in conformity with those laws and their constitutional documents;
- guarantors must accept responsibility for information relating to them contained in listing documents;
- guarantors must publish full details of any other financial information they provide to any other exchange or market, to the extent necessary to enable investors to make an informed assessment of the financial position of the guarantor and of the structured products; and
- the same requirement to prepare interim financial reports in accordance with usual accounting policies and procedures applies to guarantors, not only issuers.

## **Structured Products Linked to the Issuer’s Own Securities**

Issuers will be expressly prohibited from issuing structured products where the underlying security is or includes any security issued by the issuer itself, by members of the issuer’s group (being holding companies, subsidiaries and fellow subsidiaries), or by a company of which the issuer is a controlling shareholder or has effective management control. This prohibition is intended to protect investors against conflicts of interest.

## **Government and Government-Backed Entity Issuers**

The current carve-out for government and government-backed entities from the Regulated Entity and credit rating eligibility requirements will be removed. All issuers of non-collateralised structured products, including government and government-backed entities, will be required to satisfy the same eligibility requirements.

## HKMA-Regulated Applicants

Applicants regulated by the HKMA who intend to become issuers of structured products listed on HKEX will be required to notify the HKMA of their intention as soon as possible and to provide HKEX with a copy of that notification before HKEX will consider any listing application. This requirement applies to new applicants only.

## Publication of Eligible Underlying Assets

The HKEX will amend the HKEX Listing Rules to clarify that the list of eligible underlying stocks and ETFs listed on HKEX (currently published approximately quarterly) may also be published at shorter intervals as HKEX determines. HKEX will also publish, from time to time, additional lists of stocks and ETFs that become eligible between scheduled publications, and separate lists of other eligible underlying assets. HKEX will inform issuers upon each publication.

## Collateralised Structured Products

The collateral arrangements requirements will be updated as follows:

- the prescriptive modes of security arrangement will be replaced with a generic requirement that the collateral be clearly identified, properly segregated and ring-fenced for the benefit of holders in respect of each series or tranche, from all other series or tranches issued by the same issuer;
- the reference to “custodian” and “depository” as eligible collateral holders will be replaced with a reference to “such other party as agreed by HKEX” (defined as a “collateral holder”);
- trust companies registered under Part VIII of the Trustee Ordinance will no longer be eligible as trustees, custodians or depositories for collateralised structured products;
- issuers with collateralised structured products listed on the HKEX must inform the HKEX and announce any proposed change in collateral arrangements, trusts or other security arrangements, and must not implement such changes until HKEX has confirmed that it has no comments; and
- listing documents for collateralised structured products must contain sufficient information on collateral, collateral holders and collateral arrangements to enable investors to make an informed assessment.

## Withdrawal of Listing: Definition of “Members of the Issuer’s Group”

The HKEX Listing Rules will clarify that, for the purposes of the rule permitting withdrawal of listing of a structured product prior to its expiry where the product is held entirely by the issuer or members of its group, “members of the issuer’s group” includes any of the issuer’s holding companies, subsidiaries, fellow subsidiaries and associated companies of any of them.

## New Applicants: Liquidity Provider Notification Requirement

New applicants intending to become issuers of structured products on the HKEX will be required to procure the proposed liquidity provider to notify the Intermediaries Division of the SFC of its intention to act as liquidity provider, and to provide HKEX with a copy of that notification. This requirement applies to new applicants only and will not apply retrospectively to existing issuers and liquidity providers.

## Summary Table: Key Rule Changes and Effective Dates

Change	Effective	Transition Period
Minimum DW issue price: HK\$0.25 -> HK\$0.15	1 May 2026	None
CBBC minimum issue price: removed	1 May 2026	None
Minimum market cap at issuance: HK\$10m -> HK\$6m	1 May 2026	None
Emulation Issues: identical product terms required	1 May 2026	None
New DW/CBBC entitlement ratios added	1 Jul 2026	None
ETF eligibility: AUM ≥ HK\$1bn (replacing public float)	1 Jul 2026	None
Prescriptive Product Terms moved to Product Sheets	1 Jul 2026	None
Settlement by delivery: additional platforms permitted	1 Jul 2026	None

Minimum issuer NAV: HK\$2bn -> HK\$5bn	<b>1 Jul 2026</b>	<b>Until 30 Jun 2027</b>
New Regulated Entity requirement (mandatory)	<b>1 Jul 2026</b>	<b>Until 30 Jun 2027</b>
New investment grade credit rating requirement	<b>1 Jul 2026</b>	<b>Until 30 Jun 2027</b>
Continuing obligations: NAV, rating, regulated status	<b>1 Jul 2026</b>	<b>Until 30 Jun 2027</b>
Guarantors: scope expanded to group companies	<b>1 Jul 2026</b>	None
Liquidity: 20-board-lot minimum deleted	<b>1 Jul 2026</b>	None
Liquidity: Product Sheet minimums made mandatory	<b>1 Jul 2026</b>	None
Interim financial reports: deadline 4m -> 3m	<b>1 Jul 2026</b>	None
Consolidated financial statements: mandatory	<b>1 Jul 2026</b>	None
Expanded announcement obligations (credit, winding up etc.)	<b>1 Jul 2026</b>	<b>Until 30 Jun 2027</b>
Launch Announcement: abolished (SLD replaces)	<b>1 Jul 2026</b>	None
Further Issue SLDs: simplified form permitted	<b>1 Jul 2026</b>	None
Index Information: new general exemption	<b>1 Jul 2026</b>	None
Authorised representatives: senior officer (not director)	<b>1 Jul 2026</b>	None
Legal opinions: extended scope and flexibility on timing	<b>1 Jul 2026</b>	None
Continuing obligations: consolidated in Appendix E5	<b>1 Jul 2026</b>	None
Structured product definition: cross-refers to SFO	<b>1 Jul 2026</b>	None
Issuers prohibited from listing own-securities products	<b>1 Jul 2026</b>	None
Government-backed entities: no longer exempt from eligibility	<b>1 Jul 2026</b>	None
Bilingual publication: formally required	<b>1 Jul 2026</b>	None
Collateral requirements: updated, flexible framework	<b>1 Jul 2026</b>	None

### **Actions Required for Structured Products Market Participants**

The Consultation Conclusions represent a comprehensive modernisation of HKEX's structured products listing regime. Participants in the Hong Kong structured products market should take prompt action to assess the impact of the amendments and prepare for the relevant effective dates. In particular:

- Issuers and guarantors should review their current NAV, regulatory status and credit ratings against the new eligibility requirements, and engage with the HKEX early to plan the process for updating their listing documents before 30 June 2027.
- Issuers should engage with their legal advisers to review and update their legal opinion programmes to reflect the expanded scope of required confirmations, and liaise with the HKEX on the updated timing for draft submissions.
- Compliance and documentation teams should update their internal procedures to reflect the new announcement obligations, particularly in relation to credit rating downgrades, rating outlook changes, regulatory status changes, liquidity provider changes and disruptions, and winding up events.
- Product and technology teams should prepare for the abolition of Launch Announcements and the introduction of simplified SLDs for Further Issues, including any system updates required to HKEX's e-Submission System.
- All market participants should review the updated Product Sheets to be published by HKEX on 1 May 2026 and ensure that product issuances with a Launch Date on or after that date comply with the Key Product Requirements.

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