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2015		
2015	 Global	BCBS Fundamental Review of the Trading Book (“FRTB”). The Trading Book Group (TBG) aims to finalize the FRTB policy framework by end of 2015. Two additional QISs on FRTB are planned in 2015.
Early 2015	 EU	Date of eventual entry into force of RTS on clearing. If the ESMA proposal on frontloading sent to the Commission (on 8 May) was accepted, the following would happen: (1) Contracts entered into between the notification of the classes of derivatives to ESMA and the entry into force of RTS on clearing shall not be frontloaded, and (2), Contracts entered into between the entry into force and the date of application of the clearing obligation (tbd) shall be frontloaded depending on a “minimum remaining maturity”.
Early 2015	 Australia	Proposed commencement date for G4 IRD clearing mandate.
1H 2015	 Global	Expected consultation on Credit Valuation Adjustment (CVA) by BCBS.
1Q 2015	 EU	EMIR: European Supervisory Authorities (ESAs) to adopt RTS on Margin.
1Q 2015	 Hong Kong	Expected commencement date of mandatory reporting and related record keeping obligations for regulated entities (i.e., Als, AMBs, LCs and CCPs operating in Hong Kong). Publication of a consultation paper on detailed rules regarding mandatory clearing and related record keepings rules.
1Q 2015	 EU	Bank Recovery and Resolution Directive (BRRD): Expected publication of EBA consultation on RTS regarding calculation of derivatives value and bail-in.
1Q 2015	 EU	Following the 'equivalence' decisions granted for the regulatory regimes of central counterparties (CCPs) in Australia, Hong Kong, Japan and Singapore on October 30 (under Article 25(6) of EMIR), the EC is understood to be readying further equivalence decisions for 12 other jurisdictions, including the US.
1Q 2015	 EU	ESMA adopts guidelines to clarify the scope of physical commodity forwards traded on MTFs that are subject to MiFID 1.
2Q 2015	 EU	Bank Recovery and Resolution Directive (BRRD): Adoption of the RTS on calculation of derivatives value and bail-in by the Commission.














2Q 2015	 Hong Kong	Publication of a consultation paper on detailed rules regarding oversight of systemically important participants and reporting and related record keepings obligations for Hong Kong persons (i.e., non-regulated entities).
2Q-3Q 2015	 EU	Expected publication of the European Commission Delegated Acts on MiFID 2/ MiFIR.
3Q 2015	 EU	MiFIDII/R: Expected publication of the first of the ESMA CPs on what classes of derivatives subject to the clearing obligation should be subject to the mandatory trading obligation.
3Q 2015	 EU	The earliest date of the expected publication of CCP Recovery and Resolution Framework for Financial Institutions other than Banks legislative proposal by the European Commission.
4Q 2015	 EU	Expected publication of the ESMA regulatory technical standards on MiFID 2/ MiFIR.
4Q 2015	 EU	Estimated publication of the Money Market Funds Regulation in the Official Journal of the European Union and entry into force.
January 2015	 EU	Final date for EBA to produce a review on the application of CVA charges to non financial counterparties (NFC) established in a third country, according to CRR article 382(5).
Jan. 1, 2015	 Australia	Basel III: LCR to be implemented; Leverage ratio to be disclosed
Jan. 1, 2015	 Hong Kong	Basel III: Phased in CET1 (4.5%), Total Tier 1 (6%), modified version of liquidity ratios to be applied to AIs with simpler operations. LCR to be applied to Category 1 AIs.
Jan. 1, 2015	 India	Basel III: LCR from 1 Jan 2015 and NSFR from 1 Jan 2018. The LCR and NSFR will be applicable to Indian banks on a whole bank level, i.e., on a stand-alone basis including overseas operations through branches, and later on a consolidated level. For foreign banks operating in India, the LCR and NSFR will be applicable on a stand-alone basis.
Jan. 1, 2015	 Russia	Scheduled compliance deadline for trade reporting of any outstanding products.
Jan. 1, 2015	 Singapore	Singapore Phase 1c firms backloading deadline. This applies to Phase 1c firms above the SGD 8bio threshold. Basel III: Phased in CET 1 (6.5%), Total Tier 1 (8%)
Jan. 1, 2015	 Hong Kong	Banking Amendment Ordinance Notice 2014, the Banking Capital Amendment Rules 2014 and the Banking (Liquidity) Rules come into effect.
Jan. 16, 2015	 US	Expiration of an extension of relief to Part 45 and Part 46 Reporting Counterparties and Part 20 Reporting Entities re the masking of LEIs, Other Enumerated Identifiers, Other Identifying Terms and Identifying Information – CFTC Letter No. 14-89.
Jan. 22, 2015	 US	Deadline for written extension requests re: the Volcker Rule.





Jan. 22, 2015	 US	Comment deadline for the re-opening of the comment period on the CFTC's Position Limits Proposal and Aggregation Proposal.
Jan. 30, 2015	 US	Deadline for ASX Clear (Futures) Pty Limited, Clearing Corporation of India Ltd., Korea Exchange, Inc., and OTC Clearing Hong Kong Limited to apply for an exemption from DCO registration – CFTC Letter No. 14-148, 14-149, 14-150 and 14-151.
Feb. 2, 2015	 Australia	Australian Phase 2 firms commence reporting of nexus transactions.
Feb. 11, 2015	 US	Expiration of relief to Reporting Parties for the failure to report via New Form 102A or New Form 102S (under Parts 17 and 20) – CFTC Letter No. 14-95.
Feb. 15, 2015	 US	Expiration of relief for the following package transactions from the trade execution requirement: <ul style="list-style-type: none"> • MAT/Non-MAT Uncleared; • MAT/Non-Swap Instruments; and • MAT/Non-CFTC Swap – CFTC Letter No. 14-137.
Feb. 15, 2015	 US	Expiration of relief to Yieldbroker Pty Limited (Yieldbroker) for the failure to register as a SEF and to U.S. persons for transacting in swaps on the Yieldbroker platform – CFTC Letter No. 14-139.
Feb. 16, 2015	 US	Expiration of an extension of relief to SEFs from the methods of execution for Required Transactions (under Commission Regulation 37.9(a)(2)) and the prohibition of pre-arranged trading (under Commission Regulation 37.203(a)) and to DCMs from the prohibition of pre-arranged trading (under Commission Regulation 38.152) in an execution of the “new trade, old terms” procedure for package transactions – CFTC Letter No. 14-121.
Feb. 20, 2015	 EU	Deadline for the BCBS public consultation on the outstanding issues on FRTB
End-Feb 2015	 EU	Expected date of ESMA consultation paper on draft MiFID 2/MiFIR regulatory technical standards on some remaining issues pertaining to credit and FX derivatives.
March 2015	 India	Recommended dates for i) reaching a decision on mandating CCP clearing for interbank IRS trades, ii) review on the introduction of CCP clearing for forex options and, iii) CCP clearing of CDS contracts. Recommended dates for review on i) introduction of an exclusive trading platform for forex forwards, ii) mandatory execution of trades in standardized forex swaps and forwards and, iii) mandatory trading of Forex Options. <ul style="list-style-type: none"> • On March 6, 2014, the Implementation Group on OTC Derivatives Reforms issued its report setting out, among others, the roadmap for the implementation of reform measures with regard to OTC derivatives in India including recommended timelines extending up to March 2015. The previous are recommended dates as set out in the Report.















March 2, 2015	 EU	Deadline to respond to ESMA's consultation on draft MiFID 2/MiFIR regulatory technical standards.
March 3, 2015	 EU	Market Abuse Regulation (MAR)/Market Abuse Directive 2 (MAD): ESMA must present its technical advice on delegated acts to the European Commission by that date.
March 11, 2015	 US	Expiration of relief to Reporting Parties for the failure to report via New Form 102B (under Part 17) – CFTC Letter No. 14-95.
March 27, 2015	 EU	Deadline for the BCBS public consultation on Capital Floors.
Apr. 1, 2015	 Australia	Australian phase 2 firms commodity, equity and FX backloading deadline.
Apr. 1, 2015	 Singapore	Singapore phase 1d firms back loading deadline.
Apr. 1, 2015	 India	Basel III: Final leverage ratio requirement (4.5%) to be prescribed by RBI after parallel run (1 Jan 2013 - 1 Jan 2017), taking into account the recommendations from the Basel Committee.
Apr. 1, 2015	 Japan	Entities subject to trade record keeping and reporting requirements to be expanded to include insurance companies and trust funds
Apr. 13, 2015	 Australia	Australian Phase 3A firms (for any other firms not in phase 1 and 2, except end-users, and with a total gross notional outstanding positions of AUD 5b or above as at June 30, 2014) commence reporting of credit and rates.
Apr. 30, 2015	 US	Expiration of relief to Singapore Exchange Derivatives Clearing Limited for the failure to report swap data required under Commission Regulations 45.3 and 45.4 – CFTC Letter No. 14-122.
Apr. 30, 2015	 Canada	Public dissemination of transaction level data commences in Manitoba, Ontario and Quebec. Reporting deadline for pre-existing transactions for clearing agencies and dealers.
May 15, 2015	 US	Expiration of relief for MAT/Agency MBS package transactions – CFTC Letter No. 14-137.
May 30, 2015	 US	Deadline for Singapore Exchange Derivatives Clearing Limited to backload and report the Parts 45.3 and 45.4 swap data for all swaps cleared during the period of relief expressed in CFTC Letter No. 14-122 – CFTC Letter No. 14-122.
June 15, 2015	 EU	Transitional arrangements under CRR – which allow firms to treat exposures to yet-to-be-recognised CCPs as QCCP exposures – have been extended until June 15, 2015. Firms may continue to treat CCPs as QCCPs for an extra three months (until September 15, 2015) according to article 311 of CRR. It is possible that if conditions are not in place by September for non-EU CCPs to obtain QCCP status, that the transitional provisions may need to be extended again.
June 30, 2015	 US	Expiration of an extension of relief to SDs and MSPs for the failure to report certain valuation data for cleared trades – CFTC Letter No. 14-90.

June 30, 2015	 US	Deadline for ASX Clear (Futures) Pty Limited, Clearing Corporation of India Ltd., Korea Exchange, Inc., and OTC Clearing Hong Kong Limited to apply for an exemption from DCO registration – CFTC Letter No. 14-148, 14-149, 14-150 and 14-151.
June 30, 2015	 Canada	Trade repository reporting obligations for non-dealer reporting counterparties come into effect in Manitoba, Ontario and Quebec.
July 1, 2015	 EU	Final date by which EBA (with ESMA) shall develop draft RTS on CVA charges to non-financial counterparties (NFC). The RTS will specify the procedures for excluding transactions with NFCs in a third country from the own funds requirement for CVA risk.
July 3, 2015	 EU	MAR/MAD: ESMA must present its draft technical standards to the European Commission by that date.
July 21, 2015	 US	Compliance date for Volcker Rule (expiration of extension granted in late-2013).
July 23, 2015	 US	Expiration of CFTC Order designating the DTCC-SWIFT utility (currently known as the Global Markets Entity Identifier (GMEI) utility) and other pre-Local Operating Units as acceptable suppliers of CFTC approved LEIs.
Aug. 17, 2015	 EU	The EC shall publish a review of EMIR and submit any appropriate proposals to the European Parliament and the Council. The scope of the review includes: CCP access to central bank liquidity; impact of EMIR on use of OTC derivatives by non-financial firms; and the functioning of the supervisory framework and colleges.
Autumn 2015	 EU	Expected ESMA consultation on the definition of inside information for commodity derivatives. We expect ESMA guidelines on this definition to be finalised in late 2015 or early 2016.
Sept. 1, 2015	 Japan	Trading mandate.
Sept. 30, 2015	 US	Expiration of relief to SEFs from the requirement to obtain copies of previously-negotiated freestanding agreements to a swap transaction before incorporating the terms of the underlying agreements into the Confirmation provided to the transaction counterparties (under Commission regulation 37.6(b)) as well as the requirement to keep a record of any previously-negotiated freestanding agreement incorporated into the Confirmation (under Commission regulations 37.1000, 37.1001, and 45.2(a)) – CFTC Letter No. 14-108.
Sept. 30, 2015	 US	Expiration of relief for certain CDS trades executed pursuant to a DCO's CDS Settlement Price Process (includes relief from Part 45 reporting and SEF trading requirements) – CFTC Letter No. 14-119 (previously 13-86).
Sept. 30, 2015	 US	Expiration of an extension of relief from Transaction-Level Requirements for certain non-U.S. SDs using personnel or agents located in the U.S. to arrange, negotiate, or execute a swap – CFTC Letter No. 14-140 (extends CFTC Letter No. 14-74, which extended CFTC Letter No. 14-01 and 13-71).

Sept. 30, 2015	 US	Expiration of an extension of relief to Eurex Clearing AG for the failure to register as a DCO and to their U.S. Clearing Members for the failure to clear certain proprietary trades through a registered or exempt DCO – CFTC Letter No. 14-156.
Sept. 30, 2015	 Australia	Expiration of reliefs in (i) reporting of exchange traded derivatives on foreign markets, (ii) reporting counterparty identity information in the absence of counterparty consents and notices or due to foreign privacy restrictions, (iii) snapshot reporting, (iv) reporting of transaction identifiers, (v) entity identifiers specified in the Rules, (vi) correction of errors and omissions in information reported. (vi) reporting of collateral information.
Oct. 12, 2015	 Australia	Australian Phase 3A firms commence reporting of commodity, equity and FX. Australian phase 3B firms (a Phase 3 firm but not caught under Phase 3A) commence reporting of credit, rates, commodity, equity and FX.
Oct. 19, 2015	 Australia	Australian Phase 3A firms credit and rates backloading deadline.
Nov. 2, 2015	 Australia	Australian Phase 3A firms commence reporting of collateral, barriers and valuation information for credit and rates.
Nov. 15, 2015	 US	Expiration of relief for MAT/Futures package transactions – CFTC Letter No. 14-137.
Dec. 1, 2015	 US	Expiration of relief from Parts 45 and 46 for swaps with non-US counterparties that are not guaranteed affiliates, or conduit affiliates, of a US person - See CFTC Letter No. 14-141 (previously No. 13-75). <ul style="list-style-type: none"> Applies to CFTC-registered SDs and MSPs that are non-US persons established under the laws of Australia, Canada, the EU, Japan or Switzerland, and that are not part of an affiliated group in which the ultimate parent entity is a US: SD, MSP, bank, financial holding company or bank holding company.
Dec. 1, 2015	 US	Expiration of an extension of relief from SDR Reporting Rules for certain non-U.S. SDs and MSPs transacting in swaps with certain non-U.S. counterparties – CFTC Letter No. 14-141.
Dec. 1, 2015	 Global	BCBS-IOSCO compliance date for non-cleared margin recommendations. Implementation of these recommendations is at the national level.
Dec. 1, 2015	 Japan	Phase two of clearing (continued from Dec. 1, 2014): <ul style="list-style-type: none"> Entities subject to mandatory clearing expanded to the clients above JPY 300 billion notional outstanding.

Dec. 15, 2015	 US	Expiration of relief to SEFs from the requirement that a block trade occur away from the registered SEF's or DCM's trading system or platform (under Commission Regulation 43.2) – CFTC Letter No. 14-118.
Dec. 31, 2015	 US	Expiration of an extension of relief to Eligible Affiliate Counterparties from the Outward-Facing Swaps Condition in the Inter-Affiliate Exemption – CFTC Letter No. 14-135.
Dec. 31, 2015	 US	Expiration of an extension of relief to Eligible Affiliate Counterparties who do not claim the Inter-Affiliate Exemption from the trade execution requirement – CFTC Letter No. 14-136.
Dec. 31, 2015	 US	Expiration of relief re certain recordkeeping requirements under Commission Regulation 1.35(a) – CFTC Letter No. 14-147.
Dec. 31, 2015	 US	Expiration of extensions of relief to ASX Clear (Futures) Pty Limited, Clearing Corporation of India Ltd., Korea Exchange, Inc., and OTC Clearing Hong Kong Limited from the DCO registration requirement and to their U.S. Clearing Members for the failure to clear certain proprietary trades through a registered or exempt DCO – CFTC Letter No. 14-148, 14-149, 14-150 and 14-151.
Dec. 31, 2015	 US	Expiration of an extension of relief to Japan Securities Clearing Corporation for the failure to register as a DCO and to their qualified clearing participants (and their parents and affiliates) for the failure to clear certain proprietary trades through a registered or exempt DCO – CFTC Letter No. 14-155.
Dec. 31, 2015	 Canada	Reporting deadline for pre-existing transactions for non-dealers.
Dec. 31, 2015	 Philippines	Basel III: CET 1 (6%) and Total Tier 1 (7.5) phasing out of hybrid instruments ends.
End 2015	 China	Basel III: Total capital + conservation buffer = 2.5% + 9% + 1% = 11.5% for systemically important banks (SIBs). Total capital + conservation buffer = 2.5% + 8% = 10.5% for non-systemically important banks (NSIBs). SIBs will need to meet new standards by end 2013 while NSIBs will be required to meet new standards by 2016.
End 2015	 India	Recommended date for review on the introduction of CCP clearing for currency swaps, IRS in FCY and Interest Rate Option in FCY. (See India entry for March 2015 for background.)
2015	 South Korea	Basel III: 4% leverage ratio to be adopted; liquidity ratio to be adopted.
2016 and beyond		
1Q 2016	 EU	Expected publication of benchmarks regulation in the EU Official Journal, and entry into force.
Jan. 1, 2016	 EU	Bank Recovery and Resolution Directive (BRRD): Bail-in provisions apply.

Jan. 1, 2016	 Australia	Basel III: Tier 1 + Tier 2 (8%) framework for D-SIFIs expected to come into effect; Capital Conservation (2.5%) Buffer in effect; APRA may, by notice in writing to all ADIs, require the countercyclical buffer (0-2.5%).
Jan. 22, 2016	 US	Deadline for final written extension requests re Volcker Rule.
Feb. 11, 2016	 US	Expiration of relief to Reporting Parties and Reporting Traders for the failure to report via New Form 71 (under Part 17) – CFTC Letter No. 14-95.
Feb. 12, 2016	 US	Expiration of relief for the following package transactions from the required methods of execution: <ul style="list-style-type: none"> • MAT/Non-MAT Uncleared; • MAT/Non-Swap Instruments; • MAT/Non-CFTC Swap; and • MAT/New Issuance Bond – CFTC Letter No. 14-137.
Apr. 1, 2016	 Global	Revised Pillar 3 disclosure requirements become effective, as proposed at the latest BCBS consultation document.
Apr. 18, 2016	 Australia	Australian phase 3B firms credit, rates, commodity, equity and FX backloading deadline.
May 2, 2016	 Australia	Australian Phase 3A firms commence reporting of collateral, barriers and valuation information for commodity, equity and FX. Australian phase 3B firms commence reporting of collateral, barriers and valuation information for credit, rates, commodity, equity and FX.
July 3, 2016	 EU	MAD 2/MAR package applies to firms.
Sept. 30, 2016	 Australia	Expiration of relief in reporting a FX Securities Conversion Transaction.
Dec. 1, 2016	 Japan	Entities subject to mandatory clearing to be expanded to include insurance companies and trust funds which have over JPY 300 billion outstanding.
End 2016	 EU	Capital Requirements Directives (CRD): Report including, as appropriate, a legislative proposal to introduce the leverage ratio as a binding measure as of 2018.
End 2016	 China	Basel III: full implementation of CET1 (5%), Total Tier 1 (6%) and NSFR.
Jan. 1, 2017	 Global	The revised standardized approach for credit counterparty risk (SA-CCR) becomes effective for OTC derivatives, exchange traded derivatives and long settlement transactions as per Basel transitional arrangements.
Jan. 1, 2017	 Global	Required implementation date of the final BCBS standards for the capitalization of banks' exposures to central counterparties.

Jan. 3, 2017	 EU	MiFID 2/MiFIR package and some MAR/MAD rules apply to firms.
Feb. 11, 2017	 US	Expiration of certain SEC exemptions (e.g., from the Exchange Act) for security-based swaps. This is extended from February 2014.
Feb. 12, 2017	 EU	Contracts entered into before RSD and no longer outstanding on that date must be reported to TRs
Mar. 31, 2017	 India	Basel III: Phased in CET1 (5.5%), Total Tier 1 (7%), Tier 1 + Tier 2 (9%)
June 1, 2017	 EU	Prohibition of proprietary trading under EC Bank Structure proposal effective.
4Q 2017	 EU	Effective date for clearing of derivatives by non-financials.
2018	 Philippines	Basel III: Liquidity ratio migration to Pillar 1 after parallel run 2013-2017.
Jan. 1, 2018	 EU	Separation of trading activities out of core credit institutions under Bank Structure proposals.
Jan. 1, 2018	 Australia	Basel III: NSFR implemented, includes a secured committed liquidity facility.
Jan. 1, 2018	 Hong Kong	Basel III: NSFR implemented
Jan. 1, 2018	 New Zealand	Basel III: Full implementation of CET1 (4.5%), Total Tier 1 (6%), Tier 1 + Tier 2 (8%)
Mar. 31, 2018	 India	Basel III: Capital Conservation (2.5%) phased in from March 2015
Jan. 1, 2019	 Hong Kong	Basel III: Capital Conservation (2.5%) full implementation
Jan. 1, 2019	 Singapore	Basel III: Phased in Capital Conservation (2.5%), Countercyclical Buffer (2.5%), expected for Liquidity Ratio

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