

OTC Derivatives Compliance Calendar

Updated: March 1, 2016

| 2016 | | |
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| 2016 | O EU | Following the 'equivalence' decisions granted for the regulatory regimes of central counterparties (CCPs) in Australia, Hong Kong, Japan and Singapore on October 30, 2014 (under Article 25(6) of European Market Infrastructure Regulation (EMIR)), the European Commission (EC) granted further equivalence decisions for Switzerland, Mexico, South Africa, Canada and South Korea in November. |
| 2016 | O EU | Estimated publication of the Money Market Funds Regulation in the Official Journal of the European Union and entry into force. |
| 1H 2016 | EU | Clearing and frontloading for Interest Rate Derivatives under EMIR go live. The Regulatory Technical Standards (RTS) on clearing for Interest Rate Derivatives entered into force on December 21, 2015. Clearing will commence for Category 1 counterparties (clearing members) on June 21, 2016, and December 21, 2016 for Category 2 firms (financial counterparties who notional traded exceeds a pre-defined threshold). Trades entered into between Category 1 firms after February 21 will be subject to frontloading, while contracts entered into with Category 2 after May 21 will be subject to frontloading (if those trades have a minimum remaining maturity of six months at the end of the phase-in period). |
| 1H 2016 | Singapore | Expected commencement of mandatory clearing obligations under the Securities and Futures (Clearing of Derivatives Contracts) Regulations. |
| 1Q 2016 | Global | Expected publication of revised Basel Leverage Ratio Consultation and QIS with modified SA-CCR approach for counterparty credit risk calculation. |
| 1Q 2016 | O EU | European Banking Authority (EBA) consultation on draft Regulatory Technical Standards (RTS) that specify the conditions under which competent authorities assess the significance of positions included in the scope of market risk internal models, as well as the methodology that competent authorities shall apply to assess an institution's compliance with the requirements to use an Internal Model Approach (IMA) for market risk. |
| 1Q 2016 | O EU | On January 1, 2016 Art. 55 (contractual recognition of bail-in) of the Bank Recovery and Resolution Directive (BRRD) became effective. However for this provision the implementing legislation, ie Regulatory Technical Standards (RTS), is expected to be adopted by the European Commission in Q1 2016. |
| 2H 2016 | Global | Expected BCBS finalization of CVA Risk Framework following extensive review. |
| Mid-2016 | O EU | The EC shall is expected to 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. |

| Mid-2016 | ₩ Hong Kong | Expected implementation of the SFC's revised Automated Trading Services (ATS) Guidelines. |
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| 3Q 2016 | Singapore | Expected commencement of mandatory clearing obligations under the Securities and Futures (Clearing of Derivatives Contracts) Regulations. |
| March 2016 | EU | EC/ESMA to decide on RTS requiring revision, regarding MIFID 2/MIFIR RTS. |
| March 2016 | EU | EC expected to endorse first wave of RTS (for which they have not have not expressed any objection) regarding MIFID 2/MIFIR RTS. |
| March 2016 | O EU | EC expected to publish Regulatory Technical Standards under the Market Abuse Regulation (MAR). |
| March 2016 | EU | EMIR: ESAs expected to adopt draft RTS on Margin. |
| March 2016 | EU | Expected publication of the EC Delegated Acts on the Markets in Financial Instruments Directive 2 / Markets in Financial Instruments Regulation (MiFID2/MiFIR). |
| March 2016 | EU | On October 2, ESMA published a clearing obligation RTS for credit default swaps. While the European Commission was expected to endorse the RTS on January 2, it is now expected it will endorse the RTS in March before it sends the RTS to the European Parliament and Council for a one-month non-objection period. |
| March 2016 | EU | On November 11, ESMA published a clearing obligation RTS for other interest rates derivatives, including SEK, PLN, and NOK fixed-to-float swaps and NOK, PLN and SEK forward rate agreements. The European Commission had until February 11 to endorse the RTS. However, it is expected that the EC will now send the RTS to the European Parliament and Council for a one-month non-objection period in March. |
| March 2016 | EU | EC will publish an equivalence determination for supervisory arrangements of US CCPs under Article 25 of EMIR. |
| March 1, 2016 | US | Effective date of an order issued by the CFTC delegating to the National Futures Association the responsibility to receive, review and maintain notices of swap valuation disputes in excess of \$20 million US dollars filed by SDs and MSPs. |
| March 1, 2016 | Australia | Deadline for responses to APRA's consultation on revisions to the prudential framework for securitisation. |
| March 7, 2016 | US | Deadline to submit comments in connection with the CFTC's request for comment on Draft Technical Specifications for Certain Swap Data Elements. |
| March 11, 2016 | US | Deadline to submit comments to the CFTC concerning LCH.Clearnet Ltd's petition requesting an order. |
| March 13, 2016 | EU | Deadline to submit comments in connection of the EBA consultation on RTS on Assessment Methodology for Market Risk Internal Models. |
| March 16, 2016 | US | Deadline to submit comments in connection with the CFTC's proposed rule Regulation Automated Trading. |
| March 16/17, 2016 | EU | ECON Committee (European Parliament) scheduled to vote on MIFID 'Quickfix' proposal, including – possibly – amendments on package transactions |

| March 17, 2016 | EU | The deadline for the European Commission's decision on whether to adopt the EBA draft RTS on BRRD Art. 49 (valuation of derivatives in bail-in) and Art.71 (8) (record keeping of financial contracts) unamended or to propose amendments to EBA. |
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| March 18, 2016 | US | Compliance date for the SEC final rule entitled Security-Based Swap Data Repository Registration, Duties, and Core Principles. |
| March 28, 2016 | US | Deadline to submit comments in connection with the SEC's proposed rule Use of Derivatives by Registered Investment Companies and Business Development Companies. |
| March 31, 2016 | 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)) and the requirement to report confirmation data solely contained in the terms of underlying agreements the SEF does not possess (under Commission regulation 45.3(a)) – CFTC Letter No. 15-25 (previously No. 14-108). |
| March 31, 2016 | US | Deadline to submit comments regarding the CFTC's March 3 rd roundtable to discuss the Residual Interest Deadline. |
| March 31, 2016 | Japan | Basel III: Capital buffers come into effect; Capital Conservation Buffer (2.5%), Countercyclical Buffer (phase in to 0 – 2.5%), G-SIBs Buffer (TBD), and D-SIBs Buffer (TBD). |
| End of March / Early April 2016 | EU | Expected publication of the Delegated Acts for the Market Abuse Regulation (MAR) in the EU Official Journal. Entry into force 20 days later. Application date July 3, 2016. |
| April 2016 | O EU | Expected ESMA consultation on the definition of inside information for commodity derivatives under the Market Abuse Regulation (MAR). |
| April 1, 2016 | Global | Revised Pillar 3 disclosure requirements become effective, as proposed at the latest BCBS consultation document. |
| April 1, 2016 | US | Effective date of the US Prudential Regulators' final rule on margin and capital requirements for covered swap entities. |
| April 1, 2016 | US | Effective date of the US Prudential Regulators' interim final rule on margin and capital requirements for covered swap entities. |
| April 1, 2016 | US US | Effective date of the CFTC's final rule Margin Requirements for Uncleared Swaps for Swap Dealers and Major Swap Participants. |
| April 1, 2016 | US | Effective date of the CFTC's interim final rule Margin Requirements for Uncleared Swaps for Swap Dealers and Major Swap Participants. |
| April 1, 2016 | US | Deadline for non-SDs/MSPs to file Form TO (CFTC Letter No. 16-10). |
| April 1, 2016 | ■ Mexico | The implementation time frame of the trading and central clearing requirements for banks and brokerage firms that trade among themselves or with domestic institutional investors. Market participants trading non-cleared OTC derivatives must also comply by this date. |

| April 4, 2016 | Australia | Commencement of mandatory clearing obligations for Australian and foreign clearing entities breaching the clearing threshold under the ASIC Derivative Transaction Rules (Clearing) 2015. |
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| April 17, 2016 | Canada | Deadline to comment on Proposed Amendments to Multilateral Instrument 96-101 <i>Trade Repositories and Derivatives Data Reporting</i> and Proposed Changes to Companion Policy 96-101CP. |
| April 18, 2016 | Australia | Australian Phase 3B Reporting Entity credit, rates, commodity, equity and FX backloading deadline. |
| April 19, 2016 | US | Effective date of the SEC's final rule Application of Certain Title VII Requirements to Security-Based Swap Transactions Connected with a Non-U.S. Person's Dealing Activity That Are Arranged, Negotiated, or Executed By Personnel Located in a U.S. Branch or Office or in a U.S. Branch or Office of an Agent. |
| April 27, 2016 | US | Expiration of relief to Reporting Parties from the requirement to report via New Form 102A, New Form 102S or New Form 102B (for DCMs) – CFTC Letter No. 15-52. |
| May 2, 2016 | Australia | Australian Phase 3A Reporting Entities commence reporting of collateral, barriers and valuation information for commodity, equity and FX derivatives. |
| May 9, 2016 | Hong Kong | Expiry of grace period for reporting under the Securities and Futures (OTC Derivative Transactions – Reporting and Record Keeping Obligations) Rules. |
| May 20, 2016 | Australia | Deadline for responses to APRA's consultation paper on margining and risk mitigation for non- centrally cleared derivatives. |
| May 15, 2016 | US | Expiration of an extension of relief to Yieldbroker Pty Limited for the failure to register as a SEF – CFTC Letter No. 15-56. |
| June 2016 | O EU | Expected publication of the regulation on indices used as benchmarks in financial instruments and financial contracts (Regulation on Benchmarks) in the official journal of the European Union. |
| June 2016 | South Korea | Expected end of legislative process to introduce trade reporting legislation under the Financial Investment Services and Capital Market Act (FISCMA). |
| June 15, 2016 | US | Expiration of relief to SEFs and DCMs toward the resubmission of swap trades with clerical or operational errors – CFTC Letter No. 15-24. |
| June 15, 2016 | O EU | Transitional arrangements under CRR – which allow firms to treat exposures to yet-to-be- recognised CCPs as QCCP exposures – will expire on June 15, 2016. In particular, an Implementing Regulation was published on December 12 allowing firms to treat exposures to yet- to-be-recognised CCPs as QCCP exposures for an additional six months until June 15, 2016. |
| June 30, 2016 | 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. 15-38 (14-90). |
| July 1, 2016 | Australia | Increased capital requirements for Australian residential mortgage exposures by ADIs accredited to use the internal ratings-based model for credit risk take effect. |
| July 3, 2016 | O EU | MAR/MAD2 package applies to firms. |

| July 4, 2016 | Australia | Australian Phase 3B Reporting Entities commence reporting of collateral, barriers and valuation information for credit, rates, commodity, equity and FX. |
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| July 10, 2016 | Hong Kong | Commencement of reporting of 'Reference Branch of Trade Party' and 'Desk ID' data fields. |
| July 22, 2016 | US | Expiration of an extension of an order issued by the CFTC designating the Global Markets Entity Identifier utility (formerly known as the DTCC-SWIFT utility) and other pre-Local Operating Units as acceptable suppliers of approved LEIs. |
| July 29, 2016 | Canada | Public dissemination of transaction level data commences in Manitoba, Ontario and Quebec. |
| July 29, 2016 | Canada | Expected compliance date for trade repository reporting and public reporting of transactions involving a dealer or clearing agency under the remaining provinces and territories which have adopted the Multilateral Instrument 96-101 Trade Repositories and Derivatives Data Reporting. |
| July 29, 2016 | Canada | Commencement of trade reporting by dealers and clearing agencies in Alberta, British Columbia, New Brunswick, Newfoundland and Labrador, Northwest Territories, Nova Scotia, Nunavut, Prince Edward Island, Saskatchewan and Yukon. |
| Sept. 1, 2016 | Global | BCBS-IOSCO compliance date for non-cleared margin recommendations. Implementation of these recommendations is at the national level. |
| Sept. 28, 2016 | US | Expiration of relief to Reporting Traders from the requirement to report via New Form 40/40S – CFTC Letter No. 15-52. |
| Sept. 30, 2016 | 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. 15-48 (extends CFTC Letter No. 14-140, which extended CFTC Letters No. 14-74, 14-01 and 13-71). |
| Sept. 30, 2016 | Australia | Expiration of relief from reporting FX Securities Conversion Transactions. |
| Oct. 31, 2016 | US | Expiration of relief to Singapore Exchange Derivatives Clearing Limited from the requirement to submit daily position reports comporting with certain revisions (CFTC Letter No. 16-06). |
| Nov. 1, 2016 | Canada | Commencement of trade reporting by non-dealers in Alberta, British Columbia, New Brunswick, Newfoundland and Labrador, Northwest Territories, Nova Scotia, Nunavut, Prince Edward Island, Saskatchewan and Yukon. |
| Nov. 15, 2016 | US | Expiration of relief for the following package transactions (CFTC Letter No. 15-55): MAT/New Issuance Bond MAT/Futures MAT/Non-MAT (Uncleared) MAT/Non-Swap Instruments MAT/Non-CFTC Swap |

| Nov. 15, 2016 | 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. 15-60). |
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| Nov. 16, 2016 | Mexico | The implementation time frame of the trading and central clearing requirements for banks and brokerage firms that trade with foreign financial institutions or foreign institutional investors (for example, hedge funds). |
| Dec. 1, 2016 | US | Expiration of relief from Parts 45 and 46 for swaps with non-U.S. counterparties that are not guaranteed affiliates, or conduit affiliates, of a US person (CFTC Letter No. 15-61) (previously No. 14-141). |
| | | 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, 2016 | Canada | Deadline for dealers and clearing agencies to report data for pre-existing transactions in Alberta, British Columbia, New Brunswick, Newfoundland and Labrador, Northwest Territories, Nova Scotia, Nunavut, Prince Edward Island, Saskatchewan and Yukon. |
| 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. |
| Dec. 16, 2016 | 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. 15-62). |
| Dec. 31, 2016 | 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. 15-63). |
| End 2016 | O 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 | O EU | The European Commission's earliest expected date for the publication of a legislative proposal for the CCP Recovery and Resolution Framework for Financial Institutions other than Banks. |
| End 2016 | China | Basel III: full implementation of CET1 (5%), Total Tier 1 (6%) and NSFR. |
| 2017 and beyond | | |
| 1H 2017 | South Korea | Expected commencement of trade reporting under the Financial Investment Services and Capital Market Act (FISCMA). |
| 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. |
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| Jan. 1, 2017 | Canada | Trade repositories required to make transaction level data reports available to the public in Alberta, British Columbia, New Brunswick, Newfoundland and Labrador, Northwest Territories, Nova Scotia, Nunavut, Prince Edward Island, Saskatchewan and Yukon. |
| Feb. 1, 2017 | Canada | Deadline for non-dealers to report data for pre-existing transactions in Alberta, British Columbia, New Brunswick, Newfoundland and Labrador, Northwest Territories, Nova Scotia, Nunavut, Prince Edward Island, Saskatchewan and Yukon. |
| Feb. 1, 2017 | Hong Kong | Commencement of UTI 'share-and-pair' obligations. |
| Feb. 1, 2017 | Australia | Commencement of UTI 'share-and-pair' obligations. |
| Feb. 1, 2017 | Singapore | Commencement of UTI 'share-and-pair' obligations. |
| 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 after August 16, 2012, the entry into force of EMIR and before February 12, 2014, the reporting start date (RSD), and no longer outstanding on the RSD must be reported to TRs. |
| Feb. 13, 2017 | US | Expiration of relief to Reporting Parties from the requirement to report via New Form 102B (for SEFs) – CFTC Letter No. 15-52. |
| Mar. 1, 2017 | US | Expiration of an extension of relief from the requirements under Parts 20, 45 and 46 to disclose certain counterparty identifying information (CFTC Letter No. 16-03). |
| Mar. 31, 2017 | India | Basel III: Fully 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 Structural proposal effective. |
| June 30, 2017 | Singapore | Expiry of relief for masking counterparty identity where consent has not been received under the Securities and Futures (Reporting of Derivatives Contracts) (Amendment) Regulations 2015. |
| July 1, 2017 | Hong Kong | Expected commencement of mandatory clearing under Securities and Futures (OTC Derivative Transactions – Clearing and Record Keeping Obligations and Designation of Central Counterparties) Rules, and Phase 2 mandatory reporting under the Securities and Futures (OTC Derivative Transactions – Reporting and Record Keeping Obligations) Rules. |

| November 15, 2017 | US | Expiration of CFTC relief for swap execution facilities from certain audit trail requirements in Commission Regulation 37.205 related to post-trade allocation information (CFTC Letter No. 15-68). |
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| Dec. 31, 2017 | EU | Date by which the European Commission has to publish a legislative proposal on the capital requirement regime for commodity trading firms. |
| 2018 | Philippines | Basel III: Liquidity ratio migration to Pillar 1 after parallel run 2013-2017. |
| Jan. 1, 2018 | O EU | Separation of trading activities out of core credit institutions under Bank Structural proposals. |
| Jan. 1, 2018 | Australia | Basel III: NSFR implemented, includes a secured committed liquidity facility. |
| Jan. 1, 2018 | Australia | Proposed implementations of APRA changes to the prudential framework for securitisation. |
| Jan. 1, 2018 | Singapore | Unmasking date for historical trades with counterparty where consent has not been received under the Singaporean trade reporting regime. |
| 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%) |
| Jan. 3, 2018 | O EU | Effective date for MiFID2 / MiFIR package. |
| | | MAR Art 39.4 will be updated as well, given that it refers to this MIFID 2/MIFIR effective date. In particular, MAR will reference MiFID 1 until MiFID 2 / MiFIR package applies. In addition, several MAR provisions will apply only on the MiFID 2 / MiFIR effective date (concerning Organised Trading Facilities (OTFs), small and medium sized enterprises (SMEs) growth markets, and emission allowances or auctioned products based thereon). |
| 4Q 2018 | EU | Effective date for clearing of derivatives by non-financials. |
| 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 |
| Mar. 31, 2019 | India | Basel III: Capital Conservation (2.5%) phased in from March 2016 |
| December 2019 | Global | FRTB: Banks are required to report under the new market risk standards by end of 2019 |

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