

OTC Derivatives Compliance Calendar

Updated: June 2023

New additions/content to the calendar are now highlighted in red. Please note that any deletions to the calendar are NOT emphasized.

| 2023 | | |
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| 2023 | Australia | Expected finalization of APRA FRTB and CVA risk (APS 116 and APS 180) frameworks. |
| H1 2023 | Australia | Expected third consultation paper on over-the-counter (OTC) derivatives reporting and technical guidance by ASIC. |
| Q2 2023 | O EU | The European Commission shall review the minimum standards of carbon benchmarks (climate-transition and Paris-aligned benchmarks) in order to ensure that the selection of the underlying assets is coherent with environmentally sustainable investment as defined by the EU taxonomy. |
| Q2 2023 | EU | The European Commission shall present a report to the co-legislators on the impact of an 'ESG benchmark', taking into account the evolving nature of sustainability indicators and the methods used to measure them. The report shall be accompanied, where appropriate by a legislative proposal. |
| Q2 2023 | O EU | The European Commission (EC) to adopt a Delegated Act (DA) to further extend the suspension of the third-country benchmark regime until end of 2025 under the EU Benchmarks Regulation (BMR). |
| Q2-Q3 2023 | Japan | Once the amended Comprehensive Guidelines for the Supervision of Agricultural Cooperative Financial Institutions (Guidelines) becomes effective, the Norinchukin Bank and its group entities will be required to incorporate contractual recognition of temporary stay under the Agricultural and Fishery Cooperatives Saving Insurance Act into existing and new non-Japanese law governed master agreements (the public consultation for the amendment to the Guidelines has launched on May 12, 2023 and the deadline for comments is June 12, and the implementation date is not fixed). |
| Q3 2023 | Hong Kong | Expected consultation of Hong Kong's reporting rules on adoption of UPI and CDE. |
| June 2023 | ₩ UK | Deadline for ending reliance on US dollar LIBOR. |
| June 1, 2023 | US | Three-month calculation period begins under US prudential regulations to determine whether the material swaps exposure, or daily average aggregate notional amount, of swaps, security-based swaps, FX swaps and FX forwards for an entity and its affiliates that trade with a prudentially-regulated swap dealer exceeds \$8 billion for the application of initial margin requirements as of January 1, 2024. |

| June 13, 2023 | EU | The European Commission (EC) shall adopt 4 Delegated Acts (DAs) to specify the technical screening criteria with respect to the sustainable use and protection of water and marine resources, the transition to a circular economy, pollution prevention and control and the protection and restoration of biodiversity and ecosystems. |
|---------------|-------|---|
| | | The EC is also expected to adopt a DA amending the taxonomy climate change adaptation and mitigation DA alongside a proposal for a framework for environmental, social, and governance ratings and data providers. |
| June 15, 2023 | O EU | The European Commission shall adopt a Delegated Act (DA) to designate exempted FX spot rates from the scope of the EU BMR. |
| June 15, 2023 | EU | The European Commission (EC) shall submit a report to the European Parliament and to the Council on the scope of the BMR, in particular with respect to the use of third country benchmarks. If appropriate, the EC shall accompany the report with a legislative proposal. |
| June 18, 2023 | ₩ UK | End of the <u>temporary exemption for pension scheme arrangements from clearing and margining</u> under UK EMIR (this will change subject to HM Treasury passing a statutory instrument to extend the instrument to 18 June 2025). |
| June 18, 2023 | O EU | End of the <u>temporary exemption for pension scheme arrangements from clearing and margining</u> under EU EMIR. |
| June 28, 2023 | EU | As part of CRR II, the European Banking Authority is to report on the calibration of the Standardised Approach for Counterparty Credit Risk (SA-CCR) which will potentially inform a future review by the European Commission. |
| June 28, 2023 | O EU | As part of CRR II, the European Banking Authority is to report on the treatment of repos and reverse repos as well as securities hedging in the context of the Net Stable Funding Ratio (NSFR). |
| Q3 2023 | EU | The European Commission (EC) has published the 3 rd Capital Requirements Regulation (CRR III) proposal on October 27, 2021 which will implement the Basel 3 framework in Europe. The CRR III will transpose the market risk standards (FRTB) as a binding capital constraint, the output floor, the revised credit valuation adjustment framework, alongside operational and credit risk framework, amongst others. The proposal will also take into consideration the impact of the COVID-19 crisis on the EU banking sector. Member States reached their General Approach on November 8, 2022, and the European Parliament is expected to adopt its position on January 24, 2023. Trilogues have now started under the Swedish Presidency and it is expected the CRR 3 process will be finalized by the summer depending on the negotiation process. From the EC's original proposal, most of the requirements are set to apply from January 1, 2025. As a result of the trilogue negotiations, the implementation date of January 1, 2025 may still be subject to change. |
| July 1, 2023 | US US | CFTC Effective Date for the Clearing Rules to Account for the Transition from LIBOR (See 87 Fed. Reg. 52182 (August 24, 2022)). The portion of the rule effective on this date removes the requirement to clear interest rate swaps referencing US dollar LIBOR and the Singapore Dollar Swap Offer Rate in each of the fixed-to-floating swap, basis swap and FRA classes, as applicable. |

| July 31, 2023 | US | Expiration of a second extension of relief to Shanghai Clearing House permitting it to clear swaps subject to mandatory clearing in the People's Republic of China for the proprietary trades of clearing members that are US persons or affiliates of US persons (CFTC Letter No. 22-07). |
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| September 1, 2023 | US Australia Canada Hong Kong Korea Singapore | Under CFTC rules only, initial margin requirements apply to covered swap entities with material swaps exposure (average aggregate daily notional amount exceeding USD 8 billion). Initial margin requirements apply to Phase 6 APRA covered entities with an aggregate notional amount exceeding AUD 12 billion. Under both OSFI and AMF guidelines, initial margin requirements apply to Phase 6 covered entities with aggregate month-end average notional amount exceeding CAD 12 billion. Initial margin and risk mitigation requirements apply to HKMA Als and SFC LCs with an aggregate notional amount exceeding HKD 60 billion. Initial margin requirements apply to financial institutions with derivatives exceeding more than KRW 10 trillion. Initial margin requirements apply to MAS covered entities with an aggregate notional amount |
| | Japan | exceeding SGD 13 billion. Initial margin requirements apply to JFSA covered entities with an aggregate notional amount exceeding JPY 1.1 trillion. |
| | ♦ Brazil | Initial margin requirements apply to financial institutions and other entities authorized to operate by the Central Bank of Brazil which have an average aggregate notional amount exceeding BRL 25 billion. |
| | South Africa Saudi Arabia | Initial margin requirements apply to a provider with aggregate month-end average notional amount exceeding either ZAR 15 trillion. Initial margin requirements apply to covered entities belong to a group whose average aggregate month-end notional amount of non-centrally cleared derivatives exceeds EUR 8 billion. |
| December 4, 2023 | US | Swap data repositories (SDRs), swap execution facilities (SEFs), designated contract markets (DCMs), and reporting counterparties must comply with the amendments to the CFTC swap data reporting regulations §§43.4(h) and 43.6 by the compliance date of December 4, 2023. |
| December 4, 2023 | US | Compliance date for CFTC Block and Cap reporting amendments. Expiry of relief in CFTC Staff Letter No. 22-03. |
| December 31, 2023 | EU | The amended Benchmarks Regulation that entered into force on February 13, 2021 extends the BMR transition period for non-EU benchmark administrators until December 31, 2023 and empowers the European Commission (EC) to adopt a delegated act by June 15, 2023 to prolong this extension by maximum two years until December 31, 2025. |
| | | It also enables the EC to adopt delegated acts by June 15, 2023 in order to create a list of spot foreign exchange benchmarks that will be excluded from the scope of Regulation (EU) 2016/1011. |
| December 31, 2023 | ₩ UK | Expiry of the temporary Intragroup Exemption Regime (TIGER) from clearing and margin requirements (this will change subject to HM Treasury passing a statutory instrument to extend the instrument to December 31, 2026). |

ISDA OTC Derivatives Compliance Calendar

| December 31, 2023 | Mexico | Deadline for entities and investment funds to comply with the margin requirements for uncleared derivatives under Banco de México's Circular 2/2023. |
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| 2024 and beyond | | |
| 2024-2025 | Singapore | MAS will defer implementation of the final Basel III reforms in Singapore between January 1, 2024 and January 1, 2025 to allow the industry sufficient time for proper implementation of systems needed to adopt the revised framework, including regulatory reporting. This aligns timelines with other major jurisdictions. MAS will monitor banks' implementation progress and finalize the implementation timeline for the final Basel III reforms, including the transitional arrangement for the output floor by July 1, 2023. |
| January 2024 | Australia | Expected effective date of APRA prudential standard for IRRBB (APS 117). |
| January 1, 2024 | US EU | Under US Prudential Regulations only, initial margin requirements apply to covered swap entities with material swaps exposure (average aggregate daily notional amount exceeding USD 8 billion). Initial margin requirements apply to counterparties with an aggregate average notional amount exceeding EUR 8 billion. |
| | Switzerland | Initial margin requirements apply to counterparties whose aggregate month-end average position exceeds CHF 8 billion. |
| | UK UK | Initial margin requirements apply to counterparties with an aggregate average notional amount exceeding EUR 8 billion. |
| January 1, 2024 | O EU | Application of the Delegated Acts (DAs) with respect to the four remaining environmental objectives on the sustainable use and protection of water and marine resources, the transition to a circular economy, pollution prevention and control and the protection and restoration of biodiversity and ecosystem. |
| January 1, 2024 | O EU | Disclosure of Article 8 Taxonomy reporting KPIs and accompanying information for financial undertakings. |
| January 1, 2024 | Hong Kong | Basel III: Expected implementation date of revised FRTB and CVA frameworks. |
| January 1, 2024 | Hong Kong | Basel III: Expected implementation of revised credit risk, operational risk, output floor, and leverage ratio frameworks. |
| January 4, 2024 | O EU | Expiry of the three-year derogation from margin rules in respect of non-centrally cleared over-the-counter derivatives, which are single-stock equity options or index options. |
| January 4, 2024 | IK UK | Expiry of the derogation from margin rules in respect of non-centrally cleared over-the-counter derivatives, which are single-stock equity options or index options. |
| January 4, 2024 | Hong Kong | Expiry of the SFC exemption from margin requirements for non-centrally cleared single stock options, equity basket options and equity index options. |

| January 29, 2024 | US | Compliance Date for registered entities and swap counterparties to use the Unique Product Identifier (UPI) for swaps in the credit, equity, foreign exchange and interest rate asset classes for P43 and P45 reporting. |
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| March 1, 2024 | O EU | |
| | Switzerland | |
| | US | |
| | Australia | |
| | Canada | |
| | Hong Kong | Three-month calculation period begins to determine whether the average aggregate notional amount of derivatives for an entity and its affiliates exceeds the lowest threshold for application or revocation of initial margin requirements as of the next relevant compliance date of either September 1, 2024 or January 1, 2025 (EU/UK/CHF/US Prudential). In the US, this calculation period only applies under CFTC regulations. <i>In Mexico, the corresponding compliance date is December 31, 2025.</i> |
| | Korea | |
| | Singapore | |
| | Japan | |
| | UK | |
| | S Brazil | |
| | Saudi Arabia | |
| | • Mexico | |
| March 1, 2024 | South Africa | Three-month calculation period begins to determine whether the average aggregate notional amount of derivatives for an entity and its affiliates exceeds ZAR 8 trillion threshold for initial margin requirements as of September 1, 2024 (per amended rule pending finalization). |
| March 15, 2024 | Mexico | Deadline for entities and investment funds to amend their master agreements for the exchange of margin for uncleared derivatives under the Banco de México's Circular 2/2023. |

| March 31, 2024 | Japan | Basel III: Implementation of revised credit risk, CVA, market risk (FRTB) for international active banks and domestic banks using IMM and the leverage ratio (based on the amendment published on March 28, 2023, the implementation date for ultimate parent companies of a broker-dealer (limited to those designated by JFSA) has been changed to March 31, 2025). |
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| April 1, 2024 | Japan | Go-live of revised JFSA reporting rules based on the CPMI-IOSCO Technical Guidance. JFSA finalized the Guidelines of the revised reporting rules on December 9, 2022. |
| April 1, 2024 | India | The RBI published draft guidelines on minimum capital requirements for market risk as part of convergence with Basel III standards. Applicable to all commercial banks excluding local area banks, payment banks, regional rural banks, and small finance banks. Not applicable to cooperative banks. |
| April 29, 2024 | EU | Go-live of EMIR Refit reporting rules. |
| June 28, 2024 | EU | As part of CRR II, the European Banking Authority is to monitor and report to the European Commission on Required Stable Funding (RSF) requirements for derivatives (including margin treatment and the 5% gross-derivative liabilities add-on). |
| June 28, 2024 | EU | As part of the review clause inserted in CRR II, the European Commission taking into account the reports by the European Banking Authority is expected to review the treatment of repos and reverse repos as well as securities hedging transactions through a legislative proposal. |
| June 30, 2024 | EU | The EC to review the application of the Article 8 Taxonomy Regulation including the need for further amendments with regards to the inclusion of derivatives in the numerator of KPIs for financial undertakings. |
| September 1, 2024 | US Australia | Under CFTC rules only, initial margin requirements apply to covered swap entities with material swaps exposure (average aggregate daily notional amount exceeding USD 8 billion). Initial margin requirements apply to Phase 6 APRA covered entities with an aggregate notional amount exceeding AUD 12 billion. |
| | Canada Hong Kong | Under both OSFI and AMF guidelines, initial margin requirements apply to Phase 6 covered entities with aggregate month-end average notional amount exceeding CAD 12 billion. Initial margin and risk mitigation requirements apply to HKMA Als and SFC LCs with an aggregate notional amount exceeding HKD 60 billion. |
| | Korea | Initial margin requirements apply to financial institutions with derivatives exceeding more than KRW 10 trillion. |
| | Singapore | Initial margin requirements apply to MAS covered entities with an aggregate notional amount exceeding SGD 13 billion. |
| | Japan | Initial margin requirements apply to JFSA covered entities with an aggregate notional amount exceeding JPY 1.1 trillion. |
| | ◆ Brazil | Initial margin requirements apply to financial institutions and other entities authorized to operate by the Central Bank of Brazil which have an average aggregate notional amount exceeding BRL 25 billion. |
| | South Africa | Initial margin requirements apply to a provider with aggregate month-end average notional amount exceeding ZAR 8 trillion (per amended rule pending finalization). |

| | Saudi Arabia | Initial margin requirements apply to covered entities belong to a group whose average aggregate month-end notional amount of non-centrally cleared derivatives exceeds EUR 8 billion. |
|-------------------|----------------------|---|
| Q4 2024 | Singapore | Expected go-live of the updated MAS reporting regime. |
| October 1, 2024 | US | Expiration of temporary CFTC relief regarding capital and financial reporting for certain non-US nonbank swap dealers (See CFTC Staff Letter No. 22-10 and CFTC Staff Letter No. 21-20) *relief would also expire upon the Commission's issuance of comparability determinations for the jurisdictions in question. |
| October 21, 2024 | Australia | Expected implementation of ASIC Derivative Transaction Rules (Reporting) 2024. |
| December 31, 2024 | X UK | The FCA direction under the temporary transitional powers allowing UK firms to execute certain trades with EU clients on EU venues (even though there is no UK equivalence decision in respect of those venues) expires at the end of 2024. |
| December 31, 2024 | Mexico Mexico | Annual compliance date for entities and investment funds to comply with the margin requirements for uncleared derivatives under Banco de México's Circular 2/2023 if average aggregate notional amount exceeds UDI 20 billion based on month-end calculation period from March to May 2023. |
| January 1, 2025 | UK UK | Expected implementation of the Basel 3.1 standards. |
| January 1, 2025 | O EU | Expected implementation of FRTB and CVA risk under the CRR III proposal. |
| January 1, 2025 | US | Under US Prudential Regulations only, initial margin requirements apply to covered swap entities with material swaps exposure (average aggregate daily notional amount exceeding USD 8 billion). |
| | ○ EU | Initial margin requirements apply to counterparties with an aggregate average notional amount exceeding EUR 8 billion. |
| | Switzerland | Initial margin requirements apply to counterparties whose aggregate month-end average position exceeds CHF 8 billion. |
| | ₩ UK | Initial margin requirements apply to counterparties with an aggregate average notional amount exceeding EUR 8 billion. |
| March 1, 2025 | South Africa | Three-month calculation period begins to determine whether the average aggregate notional amount of derivatives for an entity and its affiliates exceeds ZAR 100 billion threshold for initial margin requirements as of September 1, 2025 (per amended rule pending finalization). |
| March 1, 2025 | ○ EU | margin requirements as or September 1, 2025 (per amended rule pending finalization). |
| | Switzerland | |
| | us | |

| | * Australia | Three-month calculation period begins to determine whether the average aggregate notional amount of derivatives for an entity and its affiliates exceeds the lowest threshold for application or revocation of initial margin requirements as of the next relevant compliance date of either September 1, 2024 or January 1, 2025 (EU/UK/CHF/US Prudential). In the US, this calculation period only applies under CFTC regulations. In Mexico, the corresponding compliance date is December 31, 2025. |
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| | Canada | corresponding comphance date is becember 31, 2023. |
| | Hong Kong | |
| | Korea | |
| | Singapore | |
| | Japan | |
| | ₩ UK | |
| | Srazil | |
| | Saudi Arabia | |
| | Mexico | |
| March 31, 2025 | Japan | Basel III: Implementation of revised credit risk, CVA, market risk (FRTB) for domestic banks not using IMM and ultimate parent companies of a broker-dealer (limited to those designated by JFSA). |
| June 30, 2025 | O EU | The temporary recognition of UK CCPs (LME, ICE and LCH) under the EMIR 2.2 framework expires. Unless further addressed, following this date, EU firms could not have access to the UK CCPs and would need to relocate their clearing activities to EU CCPs. Under EMIR 2.2, ESMA has also performed its tiering assessment, with LME becoming a Tier 1 CCP whereas ICE and LCH are considered Tier 2 CCPs. |
| June 30, 2025 | O EU | The temporary exemption from clearing and margin requirements for cross-border intragroup transactions under EMIR expires. |
| September 1, 2025 | South Africa | Initial margin requirements apply to a provider with aggregate month-end average notional amount exceeding ZAR 100 billion (per amended rule pending finalization). |
| September 1, 2025 | US | Under CFTC rules only, initial margin requirements apply to covered swap entities with material swaps exposure (average aggregate daily notional amount exceeding USD 8 billion). |
| | Australia | Initial margin requirements apply to Phase 6 APRA covered entities with an aggregate notional amount exceeding AUD 12 billion. |

| | Canada Hong Kong Korea | Under both OSFI and AMF guidelines, initial margin requirements apply to Phase 6 covered entities with aggregate month-end average notional amount exceeding CAD 12 billion. Initial margin and risk mitigation requirements apply to HKMA AIs and SFC LCs with an aggregate notional amount exceeding HKD 60 billion. Initial margin requirements apply to financial institutions with derivatives exceeding more than KRW 10 trillion. |
|-------------------|--------------------------|--|
| | Singapore | Initial margin requirements apply to MAS covered entities with an aggregate notional amount exceeding SGD 13 billion. |
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| | ♦ Brazil | Initial margin requirements apply to financial institutions and other entities authorized to operate by the Central Bank of Brazil which have an average aggregate notional amount exceeding BRL 25 billion. |
| | South Africa | Initial margin requirements apply to a provider with aggregate month-end average notional amount exceeding ZAR 8 trillion (per amended rule pending finalization). |
| | Saudi Arabia | Initial margin requirements apply to covered entities belong to a group whose average aggregate month-end notional amount of non-centrally cleared derivatives exceeds EUR 8 billion. |
| November 15, 2025 | O EU | The CRR 2 IMA reporting requirements for market risk will be applicable from November 15, 2025 in the EU. As things stand currently in the CRR 3 political process, these IMA reporting requirements may become obsolete as we are still looking at a January 1, 2025 start date for the capitalization of market risk in the EU. However, IMA Reporting could still become live if the European Commission decides to enact the two-year delay mentioned under the CRR3 Article 461a FRTB delegated act. As this may still evolve in the CRR 3 negotiations, ISDA will keep monitoring developments in this area. |
| December 1, 2025 | US | Expiry of extension of relief concerning swap reporting requirements of Part 45 and 46 of the CFTC's regulations, applicable to certain non-US swap dealers (SD) and major swap participants (MSP) established in Australia, Canada, the European Union, Japan, Switzerland and the United Kingdom, that are not part of an affiliated group in which the ultimate parent entity is a US SD, US MSP, US bank, US financial holding company or US bank holding company. See CFTC Staff Letters No. 20-37 and 22-14. |
| January 1, 2026 | Australia | Basel III: Expected implementation of APRA FRTB and CVA risk (APS 116 and APS 180) frameworks. |
| June 2026 | O EU | Commodity dealers as defined under CCR and which have been licensed as investment firms under MiFID 2/ MIFIR have to comply with real capital/large exposures/liquidity regime under Investment Firms Regulation (IFR) provisions on liquidity and IFR disclosure provisions. |

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