

OTC Derivatives Compliance Calendar

Updated: October 2, 2018

| 2018 | | |
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| 2H 2018 | Singapore | Expected commencement of mandatory platform trading in Singapore. |
| 4Q 2018 | EU | EC expected to endorse RTS deferring clearing obligation for intragroup transactions involving non-EU group entities from December 21, 2018 to December 21, 2020. |
| 4Q 2018 | EU | The proposed Regulation amending the European Market Infrastructure Regulation (EMIR, Regulation (EU) No 648/2012), known as EMIR REFIT, is expected to be finalized. |
| 4Q 2018 | EU | For the Financial Benchmarks Regulation (BMR), the European Commission (EC) adopted draft technical standards on July 13, 2018. The draft versions are expected to be close to final and to be officially published in Q4 2018 at the earliest, after approval by the European Parliament and the Council of the EU (expected by October 15, 2018 at the earliest). Delegated acts (DA) were published in the EU Official Journal on January 17, 2018. The BMR regulation applies from January 1, 2018. |
| 4Q 2018 | US | Basel III: US agencies expected to publish NPR on SA-CCR. |
| October 1, 2018 | Singapore | Commencement of reporting of equity and commodity derivatives booked or traded in Singapore by banks and merchant banks, and reporting of Booking Location and Trader Desk Location fields by all Specified Persons. Commencement of clearing of USD and SGD fixed-floating IRS for banks exceeding \$20 billion |
| | | gross notional under the Securities and Futures (Clearing of Derivatives Contracts) Regulations. |
| October 12, 2018 | US | Deadline to submit comments in response to the CFTC's proposed rule to establish a regulatory framework for exempting a clearing organization that is organized outside the United States from registration as a Derivatives Clearing Organization (DCO). |
| October 14, 2018 | US | CHF-denominated fixed-to-floating interest rate swaps and SGD-denominated fixed-to-floating interest rate swaps become subject to the CFTC's mandatory clearing requirements (See 81. Fed. Reg. 71,212, 71,230 (Oct. 14, 2016)). |
| October 17, 2018 | US | Deadline to submit comments in response to the OCC, FRB, FDIC, SEC, and CFTC's proposed rule Proposed Revisions to Prohibitions and Restrictions on Proprietary Trading and Certain Interests in, and Relationships With, Hedge Funds and Private Equity Funds. |
| December 15, 2018 | O EU | Transitional arrangements under CRR – which allow firms to treat exposures to yet-to-be-recognized CCPs as QCCP exposures – are currently running until December 15, 2018. A 6-month extension of this transitional arrangement in the form of an EU Implementing Regulation was published early in June 2018 allowing firms to treat exposures to yet-to-be-recognized CCPs as QCCP exposures until December 15, 2018. |

| December 21, 2018 | EU | The clearing obligation RTS for non-EEA IRS, including Basis, Fixed-to-float, FRA and OIS in EUR, GBP, JPY and USD took effect from June 21, 2016 for category 1 counterparties and from December 21, 2016 for category 2 counterparties. The clearing obligation will be in effect from December 21, 2018 for category 4 counterparties and June 21, 2019 for Category 3 counterparties. The Frontloading Obligation started on February 21, 2016 for Category 1 counterparties and May 2, 2016 for Category 2 counterparties. |
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| December 21, 2018 | EU | The first three-year derogation from the clearing obligation for intragroup transactions concerning entities located in third-country jurisdictions where no EMIR Article 13(2) equivalence determination is in place expires. Following this date, in the absence of an extension, intragroup transactions in G4 currency interest rate swaps subject to the clearing obligation, between EU entities and entities located in non-equivalent third-countries, would need to be cleared through a CPP in compliance with the relevant Clearing RTS (Commission Delegated Regulation (EU) 2015/2205). |
| December 31, 2018 | Japan | Expiration of temporary exemption for licensing requirements for CCPs: CDS on non-Japanese indices/entities: clearinghouses which were established in US and Europe and holds similar license as Japan IRS denominated in Korean Won: KRX |
| December 31, 2018 | India | SEBI KYC requirements for Foreign Portfolio Investors (FPIs) becomes effective. |
| 2019 and beyond | | |
| 4Q 2018 / 1Q 2019 | EU | The European Commission's review of the Capital Requirements Regulation (CRR II) will implement some of the newest elements of the Basel III framework incl. FRTB, NSFR, SA-CCR and the Leverage ratio. This legislative proposal published in November 2016 was submitted to the European Parliament and the Council of the European Union for their consideration. Member States agreed on their General Approach on May 25, 2018. Trilogue negotiations are ongoing. Subsequent adoption is therefore expected for the end of 2018, at the earliest, or early 2019. |
| 2019 | EU | European Commission's review of the European Supervisory Authorities (ESAs) was published on September 20, 2017. The Commission invites the European Parliament and the Council to discuss and agree these proposals as a matter of priority, in order to ensure their entry into force before the end of the current legislative term in 2019. |
| 1H 2019 | India | Basel III: Expected SA-CCR implementation. |
| 1H 2019 | India | Basel III: Expected standards for the capitalization of banks' exposures to central counterparties implementation. |
| 1H 2019 | India | Basel III: Expected NSFR implementation. |
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| 1Q 2019 | Hong Kong | Expected mandated use of the LEI to identify reporting entities, transacting parties, HKTR members, CCPs and providers of clearing services. |
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| January 1, 2019 | ★ Hong Kong | Basel III: Capital Conservation Buffer (2.5%) and Countercyclical Capital Buffer (2.5%) full implementation. |
| January 1, 2019 | Philippines | Basel III: Banks required to meet LCR (100%) threshold. |
| January 1, 2019 | Philippines | Basel III: NSFR implementation. |
| January 1, 2019 | Singapore | Basel III: Phased in Capital Conservation Buffer (2.5%), Countercyclical Capital Buffer (2.5%), expected for Liquidity Ratio. |
| January 1, 2019 | Singapore | Basel III: Expected SA-CCR implementation. |
| | * China | |
| January 1, 2019 | Australia | Basel III: Standards for the capitalization of banks' exposures to central counterparties |
| | Singapore | implemented. |
| January 1, 2019 | Singapore | Basel III: Framework for interest rate risk in the banking book (IRRBB) takes effect. |
| January 1, 2019 | Malaysia Malaysia | Basel III: NSFR implemented. |
| January 1, 2019 | Singapore | Basel III: Large Exposures framework implemented. |
| January 1, 2019 | Australia | Revised APRA Prudential Standard APS 221 Large Exposures takes effect (with a 1-year transition period for groups of connected parties and structured vehicles). |
| January 1, 2019 | Hong Kong | Revised list of Financial Services Providers under the mandatory clearing regime takes effect. |
| January 2, 2019 | Indonesia | Overnight JIBOR discontinued, IndONIA to become overnight money market benchmark reference rate. |
| January 31, 2019 | India | Expected commencement of phase-in of LEI requirements for FX transactions. |
| January – February 2019 | UK | UK Parliament set to approve Brexit deal. |
| February 5, 2019 | US | Expiration of an extension of certain temporary exemptive relief in connection with the revision of the definition of "security" in the Securities Exchange Act of 1934 to encompass security-based swaps (Federal Register, February 8, 2018, Release No. 34–82626; File No. S7–27–11). |

| February 12, 2019 | 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. *Note: This was an extension to the previous compliance date (February 12, 2017) adopted when amended Implementing Technical Standards were published in the Official Journal in January 2017. The recent EMIR Refit proposal included an amendment removing this requirement to back report these expired trades completely, and this amendment is expected to be included in the final text adopted in 2018. |
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| March 2019 | UK | UK-EU Withdrawal Agreement must be backed by a supermajority of leaders of member states and then that decision must be approved by the European Parliament in a plenary vote. |
| March 28, 2019 | Australia | Expiry of ASIC Corporations (Repeal and Transitional) Instrument 2017/271, which provides relief for collective investment schemes from local registration and licensing requirements where the relevant overseas regulatory regime delivers regulatory outcomes sufficiently equivalent to the Australian regulatory regime. |
| March 30, 2019 | UK | UK set to leave the European Union at 11PM GMT on March 29. |
| March 31, 2019 | India | Basel III: Capital Conservation Buffer (2.5%) phased in from March 2016. |
| March 31, 2019 | Australia | Expiry of relief from reporting Entity Information, and Identifying Information (due to consent and foreign privacy restrictions), under ASIC Corporations (Derivative Transaction Reporting Exemption) Instrument 2018/810. |
| 2Q 2019 | Australia | Expected ASIC move from allowing position or transaction reporting to only allowing transaction reporting for equity derivatives and other OTC derivatives transacted with retail customers. |
| April 1, 2019 | India | Basel III: Large Exposures framework implemented. |
| April 1, 2019 | Hong Kong | First implementation stage of the LEI for HKTR reporting commences. |
| June 21, 2019 | EU | The clearing obligation RTS for credit default swaps, including 5-year iTraxx Europe Main and Crossover contracts, series 17 onwards, entered into force on May 9, 2016. The clearing obligation took effect from August 9, 2017 for Category 2 counterparties. It will take effect from June 21, 2019 for Category 3 counterparties and May 9, 2019 for Category 4 counterparties. The Frontloading Obligation started on October 9, 2016 for both Category 1 and Category 2 counterparties. |
| June 21, 2019 | EU | The RTS for EEA interest rates derivatives, including SEK, PLN, and NOK fixed-to-float swaps and NOK, PLN and SEK forward rate agreements entered into force on August 9. The clearing obligation took effect from August 9, 2017 for Category 2 counterparties. It will take effect from June 21, 2019 for Category 3 counterparties and August 9, 2019 for Category 4 counterparties. The Frontloading Obligation started on October 9, 2016 for both Category 1 and Category 2 counterparties. |

| Mid-2019 | ○ EU | The European Commission (EC) published a legislative proposal on a CCP recovery and resolution framework on November 28, 2016. This legislative proposal was submitted to the European Parliament (EP) and the Council of the European Union (the Council) for their consideration. The EP's draft report was voted on 24 January 2018. Once the Council adopts its version of amendments to the EC proposal, the EP and the Council (assisted by the EC) will negotiate a final text of the Regulation (in the so called 'trilogue' process). It is uncertain if this process may finish and deliver the final text of the regulation by mid-2019 (before the next EP elections). |
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| 2H 2019 | Malaysia | Expected commencement of pilot reporting regime for certain banks in Malaysia. |
| July 1, 2019 | Singapore | Unmasking date for historical transactions with counterparties where consent has not been received under the Securities and Futures (Reporting of Derivatives Contracts) (Amendment No. 2) Regulations 2017. |
| July 1, 2019 | Hong Kong | Basel III: Framework for interest rate risk in the banking book (IRRBB) implemented. |
| July 1, 2019 | Hong Kong | Basel III: Large exposures framework implemented. |
| July 1, 2019 | Malaysia Malaysia | Revised credit risk policy document implemented (consolidated basis). |
| July 1, 2019 | Australia | Basel III: Leverage ratio requirements implemented. |
| July 1, 2019 | Australia | Basel III: SA-CCR implemented. |
| July 3, 2019 | US | Deadline to submit comments and data to the SEC on the impact of MiFID II's unbundling requirements on broker-dealers, investors, and the quantity and quality of research. |
| July 20, 2019 | C EU | Application of the Money Market Funds (MMFs) Regulation to MMFs that existed before the 20 th of July 2017 (date of entry into force of the regulation). |
| August 12, 2019 | US | Expiration of relief from certain position aggregation requirements under Commission Regulation 150.4 (CFTC Letter No. 17-37). |
| September 1, 2019 | US | |
| | EU | |
| | Switzerland | |
| | Japan | |
| | Canada | Initial margin requirements apply under US PR, CFTC, Canada, Japanese, EU, Singapore, Hong Kong and Australian margin rules to Phase 4 entities. |

| | Singapore | Under Bank of Russia margin rules, variation margin requirements apply to Category 1 participants over RUB 100 billion threshold and initial margin requirements apply to Category 1 participants over RUB 600 billion threshold. |
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| | Hong Kong | |
| | Australia | |
| | Korea | |
| | Russia | |
| September 1, 2019 | ★ Hong Kong | Expected initial margin phase-in for licensed corporations where both they and the covered entity exceed HKD 6 trillion AANA of non-centrally cleared OTC derivatives on a group basis. |
| September 30, 2019 | Australia | Expiry of ASIC Corporations (Repeal and Transitional) Instrument 2016/396 and ASIC Corporations (Foreign Financial Services Providers – Limited Connection) Instrument 2017/182, which provide relief for foreign financial services providers from the requirement to hold an Australian financial services license when providing financial services to Australian wholesale clients. |
| October 1, 2019 | Singapore | Commencement of reporting of interest rate and credit derivative contracts traded in Singapore by finance companies, subsidiaries of banks incorporated in Singapore, insurers and holders of CMS licenses with annual aggregate gross notional amount of specified derivatives contracts of more than S\$5 billion, and all significant derivatives holders. |
| 1H 2020 | Hong Kong | Basel III: Expected SA-CCR implementation. |
| January 1, 2020 | EU | The transitional period under the Financial Benchmarks Regulation (BMR) ends on January 1, 2020. EU and non-EU benchmarks administrators will have to be included in the ESMA register of benchmarks (or have applied for it and not been rejected yet) by that date. Otherwise EU supervised entities will no longer be able to refer in their transactions to benchmarks provided by these administrators (with the exception of certain trades, ie transactions entered into before 1 January 2020 referencing non-EU benchmarks or transactions referencing EU benchmarks grandfathered by the relevant EU national competent authority). |
| January 4, 2020 | EU | The three-year derogation from non-cleared margin rules for intragroup transactions concerning entities located in third-country jurisdictions where no EMIR Article 13(2) equivalence determination is in place expires. Following this date, in the absence of an extension, intragroup transactions in derivatives in scope of the non-cleared margin rules, between EU entities and entities located in non-equivalent third-countries, would need to be margined in compliance with the Margin RTS (Commission Delegated Regulation (EU) 2016/2251). |

| March 1, 2020 | US | Expiration of relief to swap dealers operating in Japan providing for the posting and collection of variation margin to and from certain counterparties operating in Japan on a T+3 basis (CFTC Letter No. 17-13). |
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| April 1, 2020 | Australia | |
| | Singapore | UTI "share and pair" requirements take effect. |
| | ₩ Hong Kong | |
| July 3, 2020 | US | Expiration of relief to broker-dealers to provide research services that constitute investment advice under section 202(a)(11) of the Investment Advisers Act of 1940 to investment managers that are required under Directive 2014/65/EU to pay for the research services from their own money or research payment accounts. (SEC Relief, Division of Investment Management, October 26, 2017). |
| September 1, 2020 | US | |
| | O EU | |
| | Switzerland | |
| | Japan | |
| | Canada | Initial margin requirements apply under US PR, CFTC, Canada, Japanese, EU, Singapore, Hong Kong and Australian margin rules to Phase 5 entities. |
| | Singapore | Under Bank of Russia margin rules, variation margin requirements apply to all Category 1 participants and Category 2 participants over RUB 100 billion threshold and initial margin requirements apply to Category 1 participants over RUB 300 billion threshold and Category 2 participants over RUB 600 billion threshold. |
| | Hong Kong | |
| | Australia | |
| | V _♥ Korea | |
| | Russia | |
| September 1, 2020 | ₩ Hong Kong | Expected initial margin requirement for licensed corporations where both they and the covered entity exceed HKD 60 billion AANA of non-centrally cleared OTC derivatives on a group basis. |

| September 28, 2020 | US | Expiration of an extension of relief and additional relief to reporting parties from certain data reporting requirements implemented in connection with the CFTC's Ownership and Control Reports final rule (CFTC Letter No. 17-45). |
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| September 30, 2020 | Australia | Expiry of relief from reporting exchange-traded derivatives, Name Information and FX Securities Conversion Transactions under ASIC Corporations (Derivative Transaction Reporting Exemption) Instrument 2018/810. |
| October 1, 2020 | Singapore | Commencement of reporting of equity, commodity and FX derivative contracts booked or traded in Singapore by finance companies, subsidiaries of banks incorporated in Singapore, insurers and holders of CMS licenses with annual aggregate gross notional amount of specified derivatives contracts of more than S\$5 billion, and all significant derivatives holders. |
| | | Revised reporting standards for banks to reduce duplicate data submissions take effect. |
| November 15, 2020 | US | Expiration of an extension of relief for the following package transactions (CFTC Letter No. 17-55): MAT/New Issuance Bond MAT/Figure 2 |
| | | MAT/FuturesMAT/Non-MAT (Uncleared) |
| | | MAT/Non-Swap Instruments |
| | | MAT/Non-CFTC Swap |
| November 15, 2020 | US | Expiration of an extension of relief for SEFs from certain audit trail requirements in CFTC Regulation 37.205 related to post-trade allocation information (CFTC Letter No. 17-54). |
| November 15, 2020 | US | Expiration of an extension of relief to SEFs in connection with the execution of block trades (CFTC Letter No. 17-60). |
| November 30, 2020 | US | Expiration of relief to SEF CCOs providing them with 90 calendar days after the end of a SEF's fiscal year to concurrently file the Annual Compliance Report and fourth quarter financial report (CFTC Letter No. 17-61). |
| December 1, 2020 | U S | Expiration of an extension 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 (CFTC Letter No. 17-64) (previously No. 16-79). |
| | | 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. |
| December 31, 2020 | Global | The Financial Stability Board (FSB) recommends that regulators implement the CPMI-IOSCO Unique Transaction Identifier (UTI) Technical Guidance to take effect no later than December 31, 2020. |
| December 31, 2020 | US | Expiration of relief to Eligible Affiliate Counterparties from the Outward-Facing Swaps Condition in the Inter-Affiliate Exemption (CFTC Letter No. 17-66) (previously No. 16-81). |

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| December 31, 2020 | 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. 17-67) (previously No. 16-80). |
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| December 31, 2020 | O EU | Date by which the European Commission has to publish a legislative proposal on the capital requirement regime for commodity trading firms. |
| December 31, 2020 | UK UK | End of UK-EU transition period (to be agreed). |
| January 1, 2021 | Australia | Expected implementation of revised capital framework for ADIs. |
| February 19, 2021 | US | Expiration of an extension of relief to market participants, DCMs and SEFs from certain Part 45 reporting obligations in connection with the execution of swap transactions accepted for clearing by DCOs exempted from DCO registration or operating pursuant to no-action relief. Relief was also granted pertaining to certain data field reporting requirements in Parts 43 and 45 (CFTC Letter No. 18-03). |
| July 31, 2021 | US | Expiration of an 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. 18-04). |
| September 1, 2021 | Russia | Under Bank of Russia margin rules, variation margin requirements apply to all Category 1 participants and Category 2 participants over RUB 80 billion threshold and initial margin requirements apply to Category 1 participants over RUB 150 billion threshold and Category 2 participants over RUB 300 billion threshold. |
| January 1, 2022 | Global | FRTB: Banks are required to report under the new market risk standards by January 1, 2022. |
| January 1, 2022 | Global | Leverage Ratio: Banks are required to calculate leverage using the revised exposure definitions, including the G-SIB buffer from January 2022. |
| January 1, 2022 | Global | CVA: Banks are required to implement the revised CVA framework from January 2022. |
| September 1, 2022 | Russia | Under Bank of Russia margin rules, initial margin requirements apply to Category 1 participants over RUB 80 billion threshold and Category 2 participants over RUB 150 billion threshold. |
| September 1, 2023 | Russia | Under Bank of Russia margin rules, initial margin requirements apply to Category 2 participants over RUB 80 billion threshold. |
| | | CONTACT |

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