

**BNY Mellon Webcast (31 October 2017)** 

IS THE RENMINBI QUALIFIED FOREIGN INSTITUTIONAL INVESTOR ("RQFII") PROGRAMME STILL A VITAL CONSIDERATION FOR GLOBAL FUNDS?

by Tan Choo Lye



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# **OUR ASIA PACIFIC PRACTICE**



- Largest fully integrated U.S.based law firm in the Asia Pacific region
- 11 offices strategically located in Asia Pacific – 7 in Asia, 4 in Australia
- More than 400 lawyers permanently based in this region
- Regional Coverage represent clients across Asia, Greater China, Southeast Asia including Indonesia, Vietnam, Malaysia, India, etc.

## **1. DIRECT PRC INVESTMENT PROGRAMMES**

						Stocl	Stock Connect		
	QFII		RQFII	Shanghai Connect	Shenzhen Connect	(Northbound Bond Trading)	PBOC Scheme		
Regulators		CSRO	C, SAFE		CSRC, SAFE, PBOC, regulators in relevant jurisdiction (e.g. SFC (Hong Kong), FSA (United Kingdom), MAS (Singapore), FSC (Taiwan))	SFC, CSRC		PBOC, HKMA	PBOC
Eligible applicants/ investors	Applicant	Operating History	Asset Held or Managed (during the preceding account year)	Info	jurisdictions of: → PRC fund management companies → PRC securities companies	<ul> <li>Northbound Trading</li> <li>Any Hong Kong and non-PRC investors who are eligible to trade in the SEHK.</li> </ul>	<ul> <li>Generally the same as Northbound Trading of Shanghai Connect.</li> <li>However, at the initial stage, only</li> </ul>	<ul> <li>QFIIs</li> <li>RQFIIS</li> <li>Central banks, international financial organisations and sovereign wealth funds</li> <li>Foreign institutional investors ("FIIs") and products issued by FIIs.</li> </ul>	<ul> <li>Central banks, international financial organisations and sovereign wealth funds</li> <li>FIIs and products issued by FIIs</li> </ul>
	Asset manageme nt institution	≥2 years	≥US\$500 million	N/A	<ul> <li>PRC commercial banks</li> <li>PRC insurance companies</li> </ul>				
	Insurance company	≥2 years	≥US\$500 million	N/A	<ul> <li>Financial institutions with a principal place of business in that relevant invitation that</li> </ul>		professional investors are eligible		
	Securities company	≥5 years	≥US\$5 billion	≥US\$500 million net assets	<ul> <li>that relevant jurisdiction that have:</li> <li>obtained an asset management licence issued by a regulator in the relevant jurisdiction; and</li> <li>already conducted relevant asset management business.</li> </ul>		to trade shares that are listed on the ChiNext Board of the SZSE.		
	Commercial bank	≥10 years	≥US\$500 million	≥US\$300 million tier one capital					
	Other institutional investors	≥2 years	≥US\$500 million	N/A					
						those individual aggregate balan	ing Institutional investors and Investors who hold an ce of not less than RMB securities and cash		

# 1. DIRECT PRC INVESTMENT PROGRAMMES (Con't)

			Stock C	Bond Connect			
	QFII	RQFII	Shanghai Connect	Shenzhen Connect	(Northbound Bond Trading)	PBOC Scheme	
Permitted investments	traded or t exchanges fixed-incor on the inte securities stock-inde other finar	nds and warrants ransferred on stock	<ul> <li>Northbound Trading</li> <li>All constituent stocks of the SSE 180 Index and the SSE 380 Index, and all the SSE-listed A shares that are not included as constituent stocks of the relevant indices but which have corresponding H shares listed on SEHK, except: <ul> <li>(a) SSE-listed shares which are not traded in RMB; and</li> <li>(b) SSE-listed shares which are put under "risk alert".</li> </ul> </li> <li>Southbound Trading <ul> <li>All constituent stocks of the Hang Seng Composite LargeCap Index and Hang Seng Composite MidCap Index, and all the H shares that are not included as constituent stocks of the relevant indices but which have corresponding shares in the form of A shares listed on SSE, except: <ul> <li>(a) Hong Kong shares that are not traded in HKD;</li> <li>(b) H shares which have corresponding shares listed and traded on any exchange in Mainland China other than SSE; and</li> <li>(c) H shares which have corresponding A shares put under "risk alert" by the SSE.</li> </ul> </li> </ul></li></ul>	<ul> <li>Northbound Trading</li> <li>All constituent stocks of the SZSE Component Index and the SZSE Small/Mid Cap Innovation Index which have a market capitalization of not less than RMB 6 billion, and all the SZSE-listed A shares which have corresponding H shares listed on SEHK, except: <ul> <li>(a) SZSE-listed shares which are not traded in RMB; and</li> <li>(b) SZSE-listed shares which are put under "risk alert" or under delisting arrangement.</li> </ul> </li> <li>Southbound Trading <ul> <li>All eligible stocks for Southbound Trading under Shanghai Connect, the constituent stocks of the Hang Seng Composite SmallCap Index which have a market capitalization of not less than HKD 5 million, and all the H shares of SEHK-listed companies which have A shares listed on SZSE, except:</li> <li>(a) Hong Kong shares that are not traded in HKD;</li> <li>(b) H shares which have corresponding shares listed and traded on any exchange in Mainland China other than SSE or SZSE; and</li> <li>(c) H shares which have corresponding A shares put under "risk alert" or delisting arrangement.</li> </ul> </li> </ul>	Whole range of instruments traded on the CIBM	<ul> <li>Investors which are central banks, international financial organisations, sovereign wealth funds and offshore RMB clearing / trade settlement banks may invest in:</li> <li>All cash bonds in the CIBM</li> <li>Repos, bond borrowing and lending, bond forwards, FRA, and IRS</li> <li>Other investors may only invest in:</li> <li>All cash bonds in the CIBM</li> <li>Based on its hedging needs, investor may enter in transactions such as bond lending, bond IRS (but not Repos)</li> </ul>	



## 1. DIRECT PRC INVESTMENT PROGRAMMES (Con't)

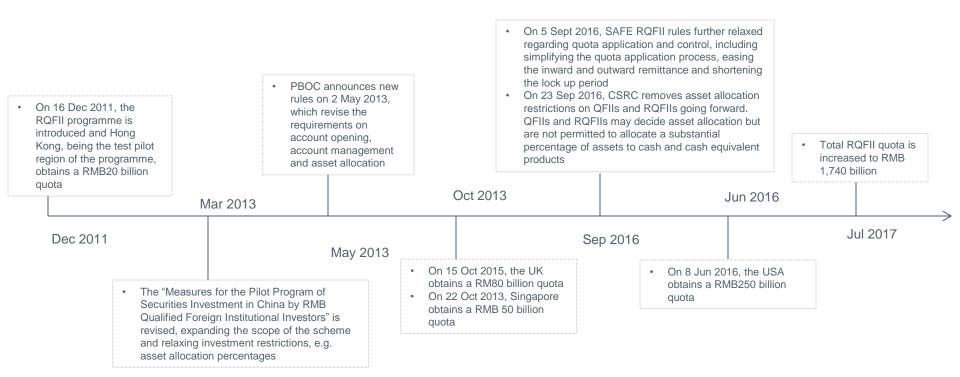
	QFII	RQFII	Stock Co		Bond Connect	PBOC Scheme	
	Serie	i sai n	Shanghai Connect	Shenzhen Connect	(Northbound Bond Trading)		
Shareholding restrictions	<ul><li>more than 10% of the tota company.</li><li>The total A shares of an i</li></ul>	shall not hold through a QFII/RQFII al shares of an individual listed ndividual listed company held by not exceed 30% of its total shares.	Similar to QFII/RQFII, i.e.: • no single foreign shareholder may hold more than 10% of the shares of a PRC listor; and		No restriction	No restriction	
Investment quota restrictions	foreign sovereign wealth	bles to QFIIs/RQFIIs (except for funds, central banks and monetary nent quota is unlimited based on	<ul> <li>Daily quotas for each of the Shanghai Connect and the Shenzhen Connect:</li> <li>Northbound Trading – RMB 13 billion</li> <li>Southbound Trading – RMB 10.5 billion</li> </ul>		N/A	<ul> <li>N/A. However, an investor may specify the anticipated investment volume in the registration form based on its actual needs.</li> <li>The accumulative net remit-in capital cannot exceed the anticipated investment volume, and investor is required to update the registration if a higher investment volume is anticipated.</li> </ul>	
Investment deadline	within one year of its filing	QFII must still use up its quota g or approval, as applicable. ncel all or part of the unutilised	N/A		N/A	N/A	
Minimum investment requirement			<ul> <li>Northbound Trading</li> <li>All eligible SSE and SZS subject to the same trad which is 100 shares.</li> <li>Southbound Trading</li> <li>All orders are subject to order size requirements</li> </ul>	ling board lot size, the board lot and	<ul> <li>Minimum order size of RMB 1 million.</li> </ul>	Minimum order size of RMB 1 million	
Lock-up period	<ul> <li>Three months, starting from the date on which an aggregate amount of no less than US\$20 million has been remitted into PRC within the QFII's quota</li> </ul>	<ul> <li>Open-ended funds: no lock-up period</li> <li>Other RQFIIs: Three months, starting from the date on which an aggregate amount of no less than RMB 100 million has been remitted into PRC within the RQFII's quota</li> </ul>	<ul> <li>Generally no lock-up pe (turnaround) trading is n Northbound Trading.</li> </ul>		N/A	N/A	



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		DOF	Stock Connec	Bond Connect		
	QFII	RQFII	Shanghai Connect	Shenzhen Connect	(Northbound Bond Trading)	PBOC Scheme
Recycling of investment quotas	<ul> <li>Not specifically permitted (open-ended China funds may be permitted to do so)</li> </ul>	<ul> <li>Open-ended funds: Yes, as long as the net amount of investment capital remitted into China is within the investment quota</li> <li>Other RQFIIs: No</li> </ul>	N/A		N/A	N/A
Repatriation	<ul> <li>Both open-ended funds and other QFIIs:</li> <li>may repatriate or remit in the net amount of its subscription or redemption proceeds on a daily basis</li> <li>however, the accumulated monthly net capital outflow remitted by a QFII (including capital and profit) shall not exceed 20% of its total PRC onshore investment at the end of the preceding year)</li> </ul>		N/A		N/A	<ul> <li>May repatriate or remit on a daily basis</li> <li>Investors who fail to remit in 50% of its registered investment volume within nine months are required to re-register the anticipated investment volume with PBOC.</li> </ul>
Monthly repatriation restrictions	<ul> <li>Monthly net capital outflow cannot exceed 20% of its total PRC onshore investment at the end of the preceding year.</li> </ul>	N/A	N/A		N/A	N/A
	<ul> <li>Capital gains: Capital gains generated on or after 17 temporarily exempted from Corporate Income Tax ("(</li> <li>Dividend and interest income: 10% withholding tax (s</li> <li>PRC VAT: Temporarily exempted</li> </ul>		<ul> <li>Northbound Trading (for Hong Kong and n</li> <li>Capital gains: Temporarily exempted from ("IIT") and CIT</li> <li>Dividend income: 10% withholding tax (su</li> <li>PRC VAT: Temporarily exempted</li> </ul>	n Individual Income Tax	<ul> <li>No specific taxation rules on Northbound Bond Trading, investors should make reference</li> </ul>	<ul> <li>Capital gains: Not taxable</li> <li>Coupon interest: 10% withholding tax for non- government bonds (subject to DTAs relief); however, in practice, for bonds traded through the CIBM, both the bond issuers and the clearing centres have not withheld the coupon interest</li> <li>PRC VAT: Temporarily exempted</li> </ul>
			<ul> <li>Southbound Trading (for Mainland investo</li> <li>Capital gains:         <ul> <li>Individual investors: Temporarily ex</li> <li>Corporate investors: 25% CIT</li> </ul> </li> <li>Dividend income:         <ul> <li>Individual investors: 20% IIT</li> <li>Corporate investors: 25% CIT excepshares which the Mainland corporate less than 12 months</li> </ul> </li> <li>PRC VAT: Temporarily exempted</li> </ul>	empted from IIT pt for dividend from H	to the tax policy of PBOC Scheme.	
Investment ownership	<ul> <li>Legal and beneficial owner : QFIIs/RQFIIs or, if so as their nominees</li> </ul>	lvised by them upfront,	<ul> <li>Northbound Trading</li> <li>Legal owner: Hong Kong Securities Clear</li> <li>Beneficial owner: Hong Kong and non-PR</li> <li>Southbound Trading</li> <li>Legal owner: ChinaClear</li> <li>Beneficial owner: PRC investors</li> </ul>		<ul> <li>Legal owner: HKMA</li> <li>Beneficial owner: Hong Kong and non-PRC investors</li> </ul>	Legal owner: PBOC Scheme investors

# 2. THE RQFII PROGRAMME – KEY MILESTONES (as of October 2017)





## **3. CURRENT STATUS – COUNTRIES WITH RQFII QUOTA**

	Country / Region	Granted quota (in RMB billion)	Announcement date for the RQFII programme expansion	Remarks
1	Australia	50	17 November 2014	
2	Canada	50	8 November 2014	
3	Chile	50	25 May 2015	
4	France	80	28 March 2014	
5	Germany	80	7 July 2014	
6	Hong Kong	270	16 December 2011	Initial quota of RMB20 million in 2011 increased to RMB70 billion (2012), RMB 270 billion (2014) and RMB 500 billion (2017), respectively
7	Hungary	50	27 June 2015	
8	Ireland	50	21 December 2016	
9	Korea	120	3 July 2014	Initial quota increased from RMB80 billion to RMB120 billion in 2015
10	Luxembourg	50	29 April 2015	
11	Malaysia	50	23 November 2015	

#### 3. CURRENT STATUS – COUNTRIES WITH RQFII QUOTA (Con't)

	Country / Region	Granted quota (in RMB billion)	Announcement date for the RQFII programme expansion	Remarks
12	Qatar	30	3 November 2014	
13	Singapore	100	22 October 2013	Initial quota increased from RMB50 billion to RMB100 billion in 2015
14	Switzerland	50	21 January 2015	
15	Thailand	50	17 December 2015	
16	UAE	50	14 December 2015	
17	UK	80	15 October 2013	
18	USA	250	8 June 2016	
	Total	1,740		

# 4. WHY RQFII?

#### More flexible than:-

- Stock/Bond Connect/CIBM
  - Quota restrictions
  - Wider investment scope
  - Ability to invest directly in PRC bonds, stocks & securities
- QFII

#### Can be used together with other direct access channels



### 4. WHY RQFII? RELEVANCE OF THE RQFII SCHEME AND FUTURE TRENDS (Cont')

#### Practicality

- Inability to transfer between schemes
- Compliance
- Time
- Costs
- Political
- Important to PRC regulators' overall plan to internationalize the RMB

# **5. DEVELOPMENTS**

- Allocations continue to grow
- New investor markets

# **6. THE FUTURE**

#### What investors should do

- Review existing PRC portfolio and strategy
  - Determine appropriate level of exposure
  - Decide whether short or long-term
  - Consider current status and capacity
  - Invest in new and different structures
    - Dealing with PRC securities requires different systems to those for non-PRC securities
      - IT
      - Compliance
    - Human resources
    - Products
    - Legal
- Diversification rather than consolidation



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