Schroder International Selection Fund

Société d'Investissement à Capital Variable 5, rue Höhenhof, L-1736 Senningerberg Grand Duchy of Luxembourg



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IMPORTANT: This letter is important and requires your immediate attention. If you have any questions about the content of this letter, you should seek independent professional advice. The directors of Schroder International Selection Fund accept full responsibility for the accuracy of the information contained in this letter and confirm, having made all reasonable enquiries, that to the best of our knowledge and belief there are no other facts the omission of which would make any statement misleading.

9 December 2016

Dear Shareholder,

Schroder International Selection Fund

The board of directors of Schroder International Selection Fund (the "Company") has decided to update the additional information of the Company's sub-funds (the "Funds") as disclosed in the "Fund Details" section of the Hong Kong Covering Document of the Company.

The purpose of the update is to provide investors with greater transparency of the types of assets that the Funds may use to capture market opportunities in China and to provide flexibility for the Funds to invest directly in China A-Shares via the Shanghai-Hong Kong Stock Connect and the Shenzhen-Hong Kong Stock Connect (collectively the "Stock Connect"). All other key features of the Funds, including fee structure, risk profile and the way financial derivative instruments are used, will remain the same.

The additional information of the Funds which is being clarified in the "Fund Details" section of the Hong Kong Covering Document of the Company is as follows:

All Funds

Unless specified otherwise in Appendix III to the Prospectus, the Funds may invest no more than 5% of their respective Net Asset Value in China A-Shares via the Shanghai-Hong Kong Stock Connect and the Shenzhen-Hong Kong Stock Connect (collectively "Stock Connect").

Asian Dividend Maximiser*, Global Equity Yield and Global Dividend Maximiser*

The Funds may invest (i) no more than 5% of their respective Net Asset Value in China A-Shares via Shenzhen-Hong Kong Stock Connect and (ii) no more than 10% of their respective Net Asset Value in China A-Shares via Stock Connect.

BRIC (Brazil, Russia, India, China), Emerging Markets, Global Multi-Asset Income, QEP Global Active Value and QEP Global Quality

^{*} The name "Dividend Maximiser" refers to the investment objective of the fund to enhance the fund dividend by generating extra income from selling covered call options on the underlying equity portfolio and this may reduce the potential capital growth and future income of the fund. It does not suggest that the manager would aim at seeking the highest possible dividends for the fund.

The Funds may invest directly in China A-Shares via the Stock Connect. Indirect exposure to China A-Shares may also be sought for the Funds through investment in financial instruments such as China market access products and other funds with China access through RQFII/QFII quotas. The Funds do not currently intend to invest (i) more than 5% of their respective Net Asset Value in China A-Shares via Stock Connect and (ii) 10% or more of their respective Net Asset Value directly and indirectly in China A-Shares and China B-Shares.

Asian Opportunities, Asian Equity Yield, Asian Smaller Companies, Asia Pacific Cities Real Estate, Asian Total Return, China Opportunities, Emerging Asia, Global Smaller Companies, Greater China and Hong Kong Equity

For clarification, in relation to the Funds' investment objectives as described in Appendix III to the Prospectus, the Funds may invest directly in China A-Shares via the Stock Connect. Indirect exposure to China A-Shares may also be sought for the Funds through investment in financial instruments such as China market access products and other funds with China access through RQFII/QFII quotas. The Funds do not currently intend to invest (i) more than 10% of their respective Net Asset Value in China A-Shares via Stock Connect, (ii) more than 5% of their respective Net Asset Value in China A-Shares via Shenzhen-Hong Kong Stock Connect and (iii) 30% or more of their respective Net Asset Value directly and indirectly in China A-Shares and China B-Shares.

For further information, please refer to the Appendix for the updated "Stock Connect" section (replacing the existing "Shanghai-Hong Kong Stock Connect" section) and the updated "Risks associated with investing through the Stock Connect" (replacing the existing "Risks associated with the Shanghai-Hong Kong Stock Connect") under the "Risks of Investment" section of the Hong Kong Covering Document of the Company.

Costs of making these changes including regulatory and shareholder communication costs will be borne by Schroder Investment Management (Luxembourg) S.A. which is the Company's management company.

If you have any questions or would like more information, please contact your usual professional advisor or Schroders Investor Hotline on (+852) 2869 6968.

Yours faithfully,

Alastair Woodward Authorised Signatory Cord Rodewald
Authorised Signatory

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Appendix

Stock Connect

The Shanghai-Hong Kong Stock Connect is a securities trading and clearing links program developed by Hong Kong Exchanges and Clearing Limited ("HKEX"), Shanghai Stock Exchange ("SSE") and China Securities Depositary and Clearing Corporation Limited ("ChinaClear") and the Shenzhen-Hong Kong Stock Connect is a securities trading and clearing links program developed by HKEX, Shenzhen Stock Exchange ("SZSE") and ChinaClear. The aim of the Stock Connect is to achieve mutual stock market access between mainland China and Hong Kong.

The Shanghai-Hong Kong Stock Connect comprises a Northbound Shanghai Trading Link and a Southbound Hong Kong Trading Link under the Shanghai-Hong Kong Stock Connect. Under the Northbound Shanghai Trading Link, Hong Kong and overseas investors (including the Funds), through their Hong Kong brokers and a securities trading service company established by The Stock Exchange of Hong Kong Limited ("SEHK"), may be able to trade eligible China A-Shares listed on the SSE by routing orders to SSE. Under the Southbound Hong Kong Trading Link under the Shanghai-Hong Kong Stock Connect, investors in mainland China will be able to trade certain stocks listed on the SEHK. Under a joint announcement issued by the Securities and Futures Commission in Hong Kong (the "SFC") and the China Securities Regulatory Commission ("CSRC") the Shanghai-Hong Kong Stock Connect commenced trading on 17 November 2014.

Under the Shanghai-Hong Kong Stock Connect, the Funds, through their Hong Kong brokers may trade certain eligible shares listed on the SSE. These include all the constituent stocks from time to time of the SSE 180 Index and SSE 380 Index, and all the SSE-listed China A-Shares that are not included as constituent stocks of the relevant indices but which have corresponding H-Shares listed on SEHK, except the following:

- SSE-listed shares which are not traded in RMB;
- and SSE-listed shares which are included in the "risk alert board".

It is expected that the list of eligible securities will be subject to review.

The trading is subject to rules and regulations issued from time to time. Trading under the Shanghai-Hong Kong Stock Connect is subject to a daily quota ("Daily Quota"). Northbound Shanghai Trading Link and Southbound Hong Kong Trading Link under the Shanghai-Hong Kong Stock Connect will be subject to a separate set of Daily Quota. The Daily Quota limits the maximum net buy value of cross-boundary trades under the Shanghai-Hong Kong Stock Connect each day.

The Shenzhen-Hong Kong Stock Connect comprises a Northbound Shenzhen Trading Link and a Southbound Hong Kong Trading Link under the Shenzhen-Hong Kong Stock Connect. Under the Northbound Shenzhen Trading Link, Hong Kong and overseas investors (including the Funds), through their Hong Kong brokers and a securities trading service company established by SEHK, may be able to trade eligible China A-Shares listed on the SZSE by routing orders to SZSE. Under the Southbound Hong Kong Trading Link under the Shenzhen-Hong Kong Stock Connect investors in mainland China will be able to trade certain stocks listed on the SEHK. Under a joint announcement issued by the SFC and CSRC the Shenzhen-Hong Kong Stock Connect will commence trading on 5 December 2016.

Under the Shenzhen-Hong Kong Stock Connect, the Funds, through their Hong Kong brokers may trade certain eligible shares listed on the SZSE. These include any constituent stock of the SZSE Component Index and SZSE Small/Mid Cap Innovation Index which has a market capitalisation of RMB6 billion or above and all SZSE-listed shares of companies which have issued both China A-Shares and H-Shares, except the following:

- SZSE-listed shares which are not traded in RMB;
- and SZSE-listed shares which are included in the "risk alert board".

At the initial stage of the Northbound Shenzhen Trading Link, investors eligible to trade shares that are listed on the ChiNext Board of SZSE under the Northbound Shenzhen Trading Link will be limited to institutional professional investors as defined in the relevant Hong Kong rules and regulations.

It is expected that the list of eligible securities will be subject to review.

The trading is subject to rules and regulations issued from time to time. Trading under the Shenzhen-Hong Kong Stock Connect will be subject to a Daily Quota. Northbound Shenzhen Trading Link and Southbound Hong Kong Trading Link under the Shenzhen-Hong Kong Stock Connect will be subject to a separate set of Daily Quota. The Daily Quota limits the maximum net buy value of cross-boundary trades under the Shenzhen-Hong Kong Stock Connect each day.

The Hong Kong Securities Clearing Company Limited ("HKSCC"), a wholly-owned subsidiary of HKEX, and ChinaClear will be responsible for the clearing, settlement and the provision of depository, nominee and other related services of the trades executed by their respective market participants and investors. China A-Shares traded through the Stock Connect are issued in scripless form, and investors will not hold any physical China A-Shares.

Although HKSCC does not claim proprietary interests in the SSE and SZSE securities held in its omnibus stock accounts in ChinaClear, ChinaClear as the share registrar for SSE and SZSE listed companies will still treat HKSCC as one of the shareholders when it handles corporate actions in respect of such SSE and SZSE securities.

SSE-/SZSE-listed companies usually announce information regarding their annual general meetings/extraordinary general meetings about two to three weeks before the meeting date. A poll is called on all resolutions for all votes. HKSCC will advise the Hong Kong Central Clearing and Settlement System ("CCASS") participants of all general meeting details such as meeting date, time, venue and the number of resolutions.

Under the Stock Connect, Hong Kong and overseas investors will be subject to the fees and levies imposed by SSE, SZSE, ChinaClear, HKSCC or the relevant Mainland Chinese authority when they trade and settle SSE Securities and SZSE securities. Further information about the trading fees and levies is available online at the website:

http://www.hkex.com.hk/eng/market/sec_tradinfra/chinaconnect/chinaconnect.htm

Risks associated with investing through the Stock Connect

Investment in China A-Shares by the Funds via the Stock Connect may expose the Funds to the following additional risks:

Quota limitations

The Stock Connect is subject to quota limitations. In particular, the Stock Connect is subject to a daily quota which does not belong to the Funds and can only be utilised on a first-come-first-serve basis. Once the daily quota is exceeded, buy orders will be rejected (although investors will be permitted to sell their cross-boundary securities regardless of the quota balance). Therefore, quota limitations may restrict the Funds' ability to invest in China A-Shares through the Stock Connect on a timely basis, and the Funds may not be able to effectively pursue its investment strategies.

Differences in trading days

The Stock Connect only operates on days when both mainland China and Hong Kong markets are open for trading and when banks in both markets are open on the corresponding settlement days. So it is possible that there are occasions when it is a normal trading day for the mainland China stock market but Hong Kong investors (such as the Funds) cannot carry out any China A-Shares trading through the Stock Connect. Due to the differences in trading days, the Funds may be subject to a risk of price fluctuations in China A-Shares during the time when the Stock Connect is not trading as a result.

Suspension risk

Each of the SEHK, SSE and SZSE reserves the right to suspend Northbound and/or Southbound trading if necessary for ensuring an orderly and fair market and that risks are managed prudently. Consent from the

relevant regulator would be sought before a suspension is triggered. Where a suspension in the Northbound trading through the Stock Connect is effected, the Funds' ability to access the mainland China market will be adversely affected.

Operational risk

The Stock Connect is premised on the functioning of the operational systems of the relevant market participants. Market participants are able to participate in this program subject to meeting certain information technology capability, risk management and other requirements as may be specified by the relevant exchange and/or clearing house.

The securities regimes and legal systems of the two markets differ significantly and market participants may need to address issues arising from the differences on an on-going basis. There is no assurance that the systems of the SEHK and market participants will function properly or will continue to be adapted to changes and developments in both markets. In the event that the relevant systems failed to function properly, trading in both markets through the program could be disrupted. The Funds' ability to access the China A-Shares market (and hence to pursue its investment strategy) will be adversely affected.

Restrictions on selling imposed by front-end monitoring

The mainland China regulations require that before an investor sells any share, there should be sufficient shares in the account; otherwise SSE or SZSE will reject the sell order concerned. SEHK will carry out pre-trade checking on China A-Share sell orders of its participants (i.e. the stock brokers) to ensure there is no over-selling.

If the Funds intend to sell certain China A-Shares it holds, it must transfer those China A-Shares to the respective accounts of its brokers before the market opens on the day of selling ("trading day"). If it fails to meet this deadline, it will not be able to sell those shares on the trading day. Because of this requirement, the Funds may not be able to dispose of holdings of China A-Shares in a timely manner.

Recalling of eligible stocks

When a stock is recalled from the scope of eligible stocks for trading via the Stock Connect, the stock can only be sold but restricted from being bought. This may affect the investment portfolio or strategies of the Funds, for example, when the Manager wishes to purchase a stock which is recalled from the scope of eligible stocks.

Clearing and settlement risk

HKSCC and ChinaClear have established the clearing links and each has become a participant of the other to facilitate clearing and settlement of cross-boundary trades. For cross-boundary trades initiated in a market, the clearing house of that market will on one hand clear and settle with its own clearing participants, and on the other hand undertake to fulfill the clearing and settlement obligations of its clearing participants with the counterparty clearing house.

As the national central counterparty of the mainland China securities market, ChinaClear operates a comprehensive network of clearing, settlement and stock holding infrastructure. ChinaClear has established a risk management framework and measures that are approved and supervised by the CSRC. The chances of ChinaClear default are considered to be remote. In the remote event of a ChinaClear default, HKSCC's liabilities in Northbound trades under its market contracts with clearing participants will be limited to assisting clearing participants in pursuing their claims against ChinaClear. HKSCC should in good faith, seek recovery of the outstanding stocks and monies from ChinaClear through available legal channels or through ChinaClear's liquidation. In that event, the Funds may suffer delay in the recovery process or may not be able to fully recover their losses from ChinaClear.

No Protection by Investor Compensation Fund

Investment through the Stock Connect is conducted through broker(s), and is subject to the risks of default by such brokers' in their obligations. Investments of the Funds are not covered by the Hong Kong's Investor Compensation Fund, which has been established to pay compensation to investors of any

nationality who suffer pecuniary losses as a result of default of a licensed intermediary or authorised financial institution in relation to exchange-traded products in Hong Kong. Since default matters in respect of China A-Shares via Stock Connect do not involve products listed or traded in SEHK or Hong Kong Futures Exchange Limited, they will not be covered by the Investor Compensation Fund. Therefore the Funds are exposed to the risks of default of the broker(s) they engage in their trading in China A-Shares through the Stock Connect.

Regulatory risk

The current regulations relating to Stock Connect are untested and there is no certainty as to how they will be applied. In addition, the current regulations are subject to change which may have potential retrospective effects and there can be no assurance that the Stock Connect will not be abolished. New regulations may be issued from time to time by the regulators/ stock exchanges in mainland China and Hong Kong in connection with operations, legal enforcement and cross-border trades under the Stock Connect. The Funds may be adversely affected as a result of such changes.

Legal/ Beneficial Ownership

China A-Shares traded through the Stock Connect by the Funds are held by the sub-custodian in accounts in the CCASS maintained by the HKSCC as central securities depositary in Hong Kong. HKSCC in turn holds the China A-Shares, as the nominee holder, through an omnibus securities account in its name registered with ChinaClear for the Stock Connect. The precise nature and rights of the Funds as the beneficial owners of the China A-Shares through HKSCC as nominee are not well defined under the mainland China law. There is lack of a clear definition of, and distinction between, "legal ownership" and "beneficial ownership" under the mainland China law and there have been few cases involving a nominee account structure in the mainland China courts. Therefore the exact nature and methods of enforcement of the rights and interests of the Funds under the mainland China law are uncertain. Because of this uncertainty, in the unlikely event that HKSCC becomes subject to winding up proceedings in Hong Kong it is not clear if the China A-Shares will be regarded as held for the beneficial ownership of the Funds or as part of the general assets of HKSCC available for general distribution to its creditors.

Risks associated with the Small and Medium Enterprise board and/or ChiNext market

The Funds may invest in the Small and Medium Enterprise ("SME") board and/or the ChiNext market of the SZSE via the Shenzhen-Hong Kong Stock Connect. Investments in the SME board and/or ChiNext market may result in significant losses for the Funds and their investors. The following additional risks apply:

Higher fluctuation on stock prices - Listed companies on the SME board and/or ChiNext market are usually of emerging nature with smaller operating scale. Hence, they are subject to higher fluctuation in stock prices and liquidity and have higher risks and turnover ratios than companies listed on the main board of the SZSE.

Over-valuation risk - Stocks listed on the SME board and/or ChiNext may be overvalued and such exceptionally high valuation may not be sustainable. Stock price may be more susceptible to manipulation due to fewer circulating shares.

Differences in regulations - The rules and regulations regarding companies listed on ChiNext market are less stringent in terms of profitability and share capital than those in the main board and SME board.

Delisting risk - It may be more common and faster for companies listed on the SME board and/or ChiNext to delist. This may have an adverse impact on the Funds if the companies that it invests in are delisted.

施羅德環球基金系列

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此乃重要函件,務請閣下垂閱。閣下如對本函件的內容有任何疑問,應尋找獨立專業顧問的意見。施羅德環球基金系列的董事就本函件所載資料之準確性承擔全部責任,並在作出一切合理查詢後確認,盡其所知所信,本函件並無遺漏足以令本函件的任何陳述具誤導成分的其他事實。

親愛的股東:

施羅德環球基金系列

施羅德環球基金系列(「本公司」)董事會已決定更新本公司香港說明文件的「基金詳情」一節所披露有關本公司子基金(「各基金」)的附加資料。

更新的目的是就各基金可用以把握中國市場機遇的資產類別向投資者提供更大透明度,及為了使各基金具靈活性可經滬港股票市場交易互聯互通機制和深港股票市場交易互聯互通機制(合稱「互聯互通機制」)直接投資於中國 A 股。各基金的所有其他主要特點,包括費用結構、風險概況及運用金融衍生工具的方式將維持不變。

本公司香港說明文件的「基金詳情」一節有關各基金的附加資料將闡明如下:

所有基金

除非發行章程附件 III 另有所述,各基金可經滬港股票市場交易互聯互通機制和深港股票市場交易互聯互通機制(合稱「互聯互通機制」)將不超過其各自資產淨值的 5%投資於中國 A 股。

亞洲股息、環球收益股票和環球股息

各基金可(i)經深港股票市場交易互聯互通機制將不超過其各自資產淨值的 5%投資於中國 A 股,及(ii) 經互聯互通機制將不超過其各自資產淨值的 10%投資於中國 A 股。

金磚四國(巴西、俄羅斯、印度、中國)、新興市場、環球股債收息、環球計量精選價值和環球計量優勢股票

各基金可經互聯互通機制直接投資於中國 A 股。各基金亦可透過投資於金融工具(例如中國市場連接產品)以及通過 RQFII/QFII 額度,投資於連接中國的其他基金,尋求間接投資於中國 A 股。各基金目前不擬(i) 經互聯互通機制將超過其各自資產淨值的 5%投資於中國 A 股,及(ii)將其各自資產淨值的 10%或以上直接及間接投資於中國 A 股及中國 B 股。

亞洲優勢、亞洲收益股票、亞洲小型公司、亞太地產股票、亞洲總回報、中國優勢、新興亞洲、環球小型公司、大中華和香港股票

為清晰說明,就發行章程附件Ⅲ所載上述基金投資目標,各基金可經互聯互通機制直接投資於中國A股。各基金亦可透過投資於金融工具(例如中國市場連接產品)以及透過RQFII/QFII額度,

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投資於連接中國的其他基金,尋求間接投資於中國 A 股。各基金目前不擬(i) 經互聯互通機制將超過其各自資產淨值的 10%投資於中國 A 股,(ii)經深港股票市場交易互聯互通機制將超過其各自資產淨值的 5%投資於中國 A 股,及(iii)將其各自資產淨值的 30%或以上直接及間接投資於中國 A 股及中國 B 股。

有關更多資料,請參閱本函附錄所載更新版本的本公司香港說明文件內「互聯互通機制」一節(取代現時的「滬港股票市場交易互聯互通機制」),和「投資風險」下的「經互聯互通機制投資相關的風險」一節(取代現時的「與滬港股票市場交易互聯互通機制相關的風險」)。

有關此等變更的成本(包括監管機構和通知股東的費用)將由本公司管理公司 Schroder Investment Management (Luxembourg) S.A.承擔。

閣下如有任何疑問或需要更多資料,請聯絡閣下的專業顧問或致電施羅德投資熱綫電話: (+852) 2869 6968 查詢。

此致

Alastair Woodward 授權簽署 Cord Rodewald 授權簽署

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謹啟

2016年12月9日

附錄

互聯互通機制

滬港股票市場交易互聯互通機制(「滬港通」)是由香港聯合交易所有限公司(「聯交所」)、上 交所和中國證券登記結算有限責任公司(「中國結算」)發展的一個證券交易及結算互聯互通機制, 而深港股票市場交易互聯互通機制(「深港通」)是由聯交所、深交所和中國結算發展的一個證券 交易及結算互聯互通機制,旨在實現中港兩地互相直接進入對方市場的目標。

滬港通包括滬港通下的滬股交易通和港股交易通。在滬股交易通下,香港及海外投資者(包括各基金)通過其香港經紀和聯交所設立的證券交易服務公司,可以將指示傳遞至上交所,買賣於上交所上市的合資格中國 A 股。在滬港通下的港股交易通,中國內地投資者將可以買賣於聯交所上市的若干股票。證監會和中國證監會聯合發表通告表示滬港通於 2014 年 11 月 17 日開始進行買賣。

根據滬港通,各基金通過其香港經紀可以買賣於上交所上市的若干合資格股份。此等股份包括不時的上證 180 指數成份股、上證 380 指數成份股,以及所有不在相關指數成份股內但有相應的 H 股在聯交所上市的上交所上市中國 A 股,但不包括下列股票:

- 以人民幣以外貨幣報價的滬股;及
- 被實施風險警示的滬股。

預期合資格證券的名單將不時予以檢討。

交易須要遵守不時發布的規則和法例。滬港通的交易受限於一項每日額度(「每日額度」)。滬港通下之滬股交易通和港股交易通將受各自的每日額度限制。每日額度限制了每日經滬港通進行的跨境交易的最高買入淨值。

深港通包括深港通下的深股交易通和港股交易通。在深股交易通下,香港及海外投資者(包括各基金)通過其香港經紀和聯交所設立的證券交易服務公司,可以將指示傳遞至深交所,買賣於深交所上市的合資格中國 A 股。在深港通下的港股交易通,中國內地投資者將可以買賣於聯交所上市的若干股票。證監會和中國證監會聯合發表通告表示深港通將於2016年12月5日開始進行買賣。

根據深港通,各基金通過其香港經紀可以買賣於深交所上市的若干合資格股份。此等股份包括不時的深證成指、擁有市場資本 60 億人民幣或以上的深証中小創業指數,和所有深交所上市並已發行中國 A 股和 H 股的公司股份,但不包括下列股票:

- 以人民幣以外貨幣報價的深股;及
- 被實施風險警示的深股。

深股交易通開始初期,可經深股交易通買賣於深交所創業板上市的股份的合資格投資者,將僅限於專業機構投資者,定義依相關香港規則和法例所界定。

預期合資格證券的名單將不時予以檢討。

交易須要遵守不時發布的規則和法例。深港通的交易受限於一項每日額度。深港通下之深股交易通 和港股交易通將受各自的每日額度限制。每日額度限制了每日經深港通進行的跨境交易的最高買入 淨值。 聯交所全資附屬機構香港中央結算有限公司(「香港結算」)及中國結算為各自的市場參與者和投資者進行的交易負責清算、結算,和提供存管處、代名人和其他有關服務。經互聯互通機制交易的中國 A 股均以無紙化方式發行,投資者將不會持有任何實物中國 A 股。

縱使香港結算不會就其於中國結算的綜合帳戶持有的上交所及深交所證券宣稱唯一的利益,中國結算作為上交所和深交所上市公司的股份登記處,當辦理該等上交所和深交所證券的公司行動時,仍會將香港結算視為該等證券的其中一名股東。

上交所/深交所的上市公司一般在公司年度股東大會/特別股東大會日期前二至三個星期公布大會 資料。所有議案均進行投票。香港結算將告知香港中央結算及交收系統(「中央結算及交收系統」) 參與者所有大會詳情如會議日期、時間、地點和議案數目。

經互聯互通機制投資相關的風險

各基金經互聯互通機制投資於中國 A 股可能承受以下額外風險:

額度限制

互聯互通機制受額度限制。特別是,互聯互通機制受限制的每日額度不屬於各基金,僅可以先到先得的方式被使用。當超出每日額度,買盤指令將被拒(雖然投資者將可出售其跨境證券,不論額度結餘的水平)。因此,額度限制或會限制了各基金透過互聯互通機制及時投資於中國 A 股的能力,因而令各基金或無法有效地執行其投資策略。

交易日的差異

互聯互通機制只會在中國內地及香港兩地市場均為交易日,而且兩地市場的銀行在相應的款項交收日均開放時才會開放,所以有可能出現中國內地股票市場為正常交易日,但香港投資者(例如各基金)卻不能經互聯互通機制進行任何中國 A 股交易的情況。由於交易日不同,各基金可能須承受在互聯互通機制不能交易的時間內中國 A 股價格波動的風險。

暫停風險

聯交所、上交所和深交所各自保留暫停北向及/或南向交易的權利,以便在有必要的時候,確保市場公平有序運作,以及作出審慎風險管理。在暫停觸發前將徵求相關監管機構的同意。一旦互聯互通機制下的北向交易被暫停,各基金進入中國內地市場的能力將受不利影響。

操作風險

通過互聯互通機制進行投資的先決條件是有關市場參與者的操作系統須能配合。市場參與者須符合相關交易所及/或結算所指定若干資訊技術性能、風險管理及其他方面的要求,方能參與此機制。兩地市場的證券制度及法律體制截然不同,市場參與者或須持續處理該等差異衍生的問題。

並不保證聯交所及市場參與者的系統將正常運作或可以繼續適應兩地市場的轉變及發展。如果相關系統未能正常運作,兩地市場透過機制進行的買賣可能受到干擾。各基金進入中國 A 股市場(及因而執行其投資策略)的能力將受到不利影響。

前端監控所施加的出售限制

中國內地的規例規定投資者出售任何股份前,賬戶內必須有足夠的股份,否則上交所或深交所將拒絕相關的出售指令。聯交所將對其參與者(即股票經紀)的中國 A 股沽盤指令進行交易前檢查,以確保不會發生超賣情況。

如各基金有意出售其所持的若干中國 A 股,各基金須於出售當日(「買賣日」)開市前將該等中國 A 股轉往其經紀的各相關賬戶。如未能趕及此一期限,將無法於該買賣日出售該等股份。由於有此一規定,各基金或無法及時出售其所持的中國 A 股。

合資格股票的調出

當原本為互聯互通機制合資格股票被調出互聯互通機制範圍時,該股票只能被賣出而不能被買入。這有可能影響到各基金的投資組合或策略,例如,當經理人擬買入被調出互聯互通機制範圍的某隻股票時。

結算及交收風險

香港結算及中國結算已經建立結算通,並互相成為對方的參與者,為跨境交易提供結算與交收。於 各自市場達成的跨境交易,當地結算所將與其結算參與者進行結算與交收,同時代表其結算參與者 承擔及履行與對方結算所就此跨境交易的結算與交收責任。

作為中國內地證券市場的國家中央對手方,中國結算操作一個全面的清算、結算和股票持有基礎服務網絡。中國結算已建立一個風險管理架構和措施,並獲中國證監會認可和受監察。中國結算違約的機會被視為相當低。假如罕有地發生中國結算違約事件,香港結算根據其與結算參與者的市場合約中就滬股通交易的責任只限於協助結算參與者向中國結算追討相關賠償。香港結算應出於真誠通過可用的法律途徑或透過中國結算的清盤程序向中國結算追討所欠的股票和款項。在此情況下,各基金在追討過程中可能受到耽誤或無法從中國結算追回其所有損失。

不受投資者賠償基金保障

透過互聯互通機制作出的投資乃通過經紀進行,並承受該等經紀違責的風險。各基金的投資不受香港投資者賠償基金保障。投資者賠償基金的成立乃為了持牌中介人或認可金融機構就香港交易所交易產品違約,導致任何國籍的投資者蒙受金錢損失,向該等投資者作出賠償。由於有關經互聯互通機制買賣中國 A 股的違約事件不涉及在聯交所或香港期貨交易所有限公司上市或交易的產品,將不受投資者賠償基金保障。因此,各基金將承受其所委聘的經紀通過互聯互通機制買賣中國 A 股時違約的風險。

監管風險

有關互聯互通機制的現行法例未經測試,仍未清晰如何應用。而且,現行法例有可能更改並具追溯效力,亦不保證互聯互通機制不會被廢除。中國內地和香港的監管機構/股票交易所可不時就互聯互通機制的營運、法律上的執行和跨境交易頒布新法例。各基金或會因此等更改負面地受到影響。

法定的/實益持有的擁有權

各基金經互聯互通機制買賣的中國 A 股,經次保管人於中央結算及交收系統的帳戶持有,由香港結算作為香港的中央證券存管處保存。香港結算又以代名持有人的身份經其於中國結算以其名稱註冊,為互聯互通機制設立的綜合帳戶持有中國 A 股。各基金經香港結算為代名人作為中國 A 股的實益擁有人的準確性質和權利,在中國內地法律仍未有清晰的定義。中國內地法律對「法定所有權」和「實益擁有權」的定義缺乏清楚界定和分別,中國內地法院曾處理數宗涉及代名人帳戶的案件。因此,各基金在中國內地法律下之權利和利益之實際性質和執行方法仍然模糊。由於此不確定性,而香港結算似乎不會在香港進行清盤程序,中國 A 股會否被視為各基金實益擁有而持有,或作為香港結算一般資產可作一般分派給債權人仍未清楚。

中小企業板及/或創業板市場相關風險

各基金可經深港通投資於深交所的中小企業板(「中小企業板」)及/或創業板。投資於中小企業板及/或創業板或會導致各基金及其投資者蒙受重大損失。下述其他風險亦適用:

股價波幅較高 - 中小企業板及/或創業板上市的公司通常為新興性質的公司,營運規模較小。所以,相比在深交所主板上市的公司而言,該等公司承受較高的股價和流動性波動,並承受較高的風險和基金週轉率。

價值被高估的風險 - 中小企業板及/或創業板上市的股票價值或會被高估,該等過高的估值未必會持續。股價可能因較少股份流通而易受操控。

法例的差異 - 創業板上市公司在盈利水平和股份資本方面的規則和法例,比主板和中小企業板的較為寬鬆。

被除牌的風險 - 中小企業板及/或創業板上市的公司較易被除牌。假如各基金投資的公司被除牌,對各基金或會有不利影響。