



# Doing data differently





# Helping the global financial community make informed decisions through the provision of comprehensive, accurate, timely and affordable securities and economic data services

With more than 30 years' experience, we offer comprehensive and accurate securities reference, corporate actions and pricing data for derivatives, equities, fixed income, and investment funds around the globe. We also cover economic data extensively.

We understand how crucial financial and economic data is and take a different approach as to how we proceed:

- We do not rent data, we sell it
- We do not have onerous redistribution rules
- We customize our services to meet your needs
- We cover all countries no matter how large or small
- Finally, we offer competitive prices

As a result of our on-going commitment to providing cost-effective and innovative data solutions, while ensuring the highest standards, EDI has achieved the internationally recognized quality and security certifications ISO 9001 and ISO 27001.

Headquartered in the United Kingdom, we have operations in Germany, India, Morocco, South Africa, and the United States.

Our Support Team is available on +44 (0) 207 324 0020, 24 hours a day, Monday to Friday and closed on Christmas and New Year's Day.



www.exchange-data.com 2



# **Contents**

Short Interest Data	4
Countries with Short Interest Data by Position Holder – Data fields provided	4
Countries with Short Interest Data by Traded Volume/Position	
Australia	5
Austria	
Belgium	
Brazil	
Canada (CSE)	
Canada (IIROC)	
Chile	
China – Shanghai	
China – Shenzhen	
Denmark	
Finland	
France	
Germany	
Greece	
Hong Kong	
Hungary	
Ireland	
Israel	
Italy	
Japan	
Korea	
Malaysia	
Mexico	
Netherlands	
New Zealand	
Norway	
Peru	
Poland	
Portugal	
Spain	
Singapore	
South Korea	
Sweden	
Taiwan	
Thailand	
Turkey	
United Kingdom	
United States (US) Finra Short Volume Report	12
United States (US) Firm OTC	. IO
United States (US) Finra OTCCountries Which Permit Short Selling but Have No Activity	. IO
Restrictions	. 14
Short Selling Time Reporting Rules	. 14 15
Short Selling Time Reporting Rules	



### **Short Interest Data**

Exchange Data International provides short interest data for a number of global markets. Short interest is a market- sentiment indicator that tells whether investors think a stock's price is likely to fall. It can also be compared over time to examine changes in investor sentiment.

Short interest regulation and reporting requirements vary by country. The tables below outline the data collected in each market where short selling is permitted.

We are in the process of adding two additional fields namely Short Ratio which gives the days to cover and Average Traded Volume for the past 30 days.

# Countries with Short Interest Data by Position Holder – Data fields provided

Data for these countries is reported to local regulators in compliance with ESMA short selling regulations and began for most of these markets on 1 November 2012. The exceptions to this are Spain, which has data going back to 10 June 2010 and Greece where the history begins 30 May 2013.

	Austria	Belgium	Denmark	Finland	France	Germany	Greece	Hungary	Ireland	Italy	Japan	Netherlands	Poland	Portugal	Spain	Sweden	O.K
FIGI Exchange Ticker	X	Х	Х	X	X	X	Х	X	X	X	X	X	X	X	Х	Х	х
FIGI Global ID	X	X	X	Х	Х	X	Χ	X	X	X	X	X	X	Χ	X	X	Х
FIGI Composite Ticker	X	Χ	Χ	Χ	X	X	X	Χ	X	X	X	X	Χ	X	Χ	Χ	X
FIGI Exchange ID	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ	X	X	Χ	Χ	X
ISIN	X	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ	X	Χ	Χ	Χ	X
ISSUER	X	X	X	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ	X	Χ	X	X	X
Local Code	X	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ	X
SEC ID	X	X	X	Χ	X	X	Χ	X	X	X	Χ	X	X	Χ	X	X	Х
US Code	X	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ
Cancellation Date	X	Х															
Daily or Monthly	D	D	D	D	Μ	D	D	D	D	D	D	D	D	D	D	D	D
Disclosed Position Holder Total	X	X	Χ	X	X	X	X	Χ	X	X		X	Χ	Χ	X	Χ	X
Holder Net Short Position %	X	X	X	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ	X	Χ	X	X	X
Position Date	X	X	X	Χ	X	X	Χ	X	X	X		X	X	Χ	X	X	X
Position Holder	X	X	Χ	Χ	Χ	Χ	Χ	Χ	Χ	Χ		Χ	X	Χ	X	Χ	X
Publication Date	X	X	X	Χ	X	X	Χ	X	X	X		X	X	Χ	X	X	Х
Short Position	Х	X	Х	X	X	X	X	X	X	X		X	X	X	Х	X	X



# Countries with Short Interest Data by Traded Volume/Position

### **Australia**

Australian Short Interest data is updated daily. History is available from 15 October 2010. Fields available are:

FIGI Composite Ticker	US Code
FIGI Global ID	Security Description
FIGI Exchange Ticker	Short Position Previous Balance
FIGI Exchange ID	Short Position
Symbol	% Short Position
ISIN	Days to Cover
SEC ID	Average Daily Share Volume
Issuer Name	Shares Outstanding
Local Code	

### **Austria**

Austria Short Interest data is available daily. Fields available are:

FIGI Composite Ticker	SecID
FIGI Global ID	Issuer Name
FIGI Exchange Ticker	US Code
FIGI Exchange ID	Previous Disclosed Position Holder Total
ISIN	Disclosed Position Holder
SecID	Days to Cover
Market ID	Average Daily Share Volume
Position Date	Exchange Code
Country Code	Security Description
Symbol	

### Belgium

Belgium Short Interest data is available daily. History is available from 31 October 2012. Fields available are:

FIGI Composite Ticker	ISIN
FIGI Global ID	SEC ID
FIGI Exchange Ticker	Issuer Name
FIGI Exchange ID	Security Description
US Code	Days to Cover
Previous Disclosed Position Holder	Average Daily Share Volume
MarketID	Previous Disclosed Position Holder Total
Country Code	Disclosed Position Holder Total
Symbol	

### **Brazil**

Brazilian Short Interest Data is available daily. Field available are:

FIGI Composite Ticker	Short Position Previous Balance
FIGI Global ID	Short Position
FIGI Exchange Ticker	Short Position Value
FIGI Exchange ID	Days to Cover
ISIN	Average Daily Share Volume
Local Code	Short Volume
SEC ID	Issuer Name
Security Description	US Code



### Canada (CSE)

Canadian (CSE) Short Interest Data is available bi-monthly – published on the 15<sup>th</sup> of each month. History is available from January 2013. Fields available are:

FIGI Composite Ticker	Security Description
FIGI Global ID	Value Currency
FIGI Exchange Ticker	US Code
FIGI Exchange ID	Security Type
ISIN	Average Daily Share Volume
Market ID	Days to Cover
Symbol	Short Position
SEC ID	Short Position Previous Balance
Issuer Name	

### Canada (IIROC)

Canadian (IIROC) Short Interest Data is available weekly – published on the 15<sup>th</sup> of each month. History is available from January 2013. Fields available are:

FIGI Composite Ticker	Security Description
FIGI Global ID	Currency
FIGI Exchange Ticker	US Code
FIGI Exchange ID	Average Daily Share Volume
Market ID	Days to Cover
Symbol	Short Position Value
ISIN	Short Position
SEC ID	Short Position Previous Balance
Issuer Name	

### Chile

Chile Short Interest Fields Data is available monthly. History is available from 1 December 2011. Fields available are:

FIGI Composite Ticker	Security Description
FIGI Global ID	Value Currency
FIGI Exchange Ticker	US Code
FIGI Exchange ID	Security Type
Market ID	Short Volume Previous Balance
Symbol	Short Volume
ISIN	% Short Volume
SEC ID	Short Volume Value
Issuer Name	% Short Volume Value
Short Trades	% Short Trades

### China - Shanghai

Shanghai Short Interest Fields Data is available daily. History is available from March 2010. Fields available are:

FIGI Composite Ticker	Short Volume
FIGI Global ID	Short Position Previous Balance
FIGI Exchange Ticker	Short Position
FIGI Exchange ID	Short Position Value
ISIN	Days to Cover
Local Code	Average Daily Share Volume
SEC ID	



### China - Shenzhen

Shenzhen Short Interest Fields Data is available daily. History is available from April 2010. Fields available are:

FIGI Composite Ticker	Short Position Previous Balance
FIGI Global ID	Short Position
FIGI Exchange Ticker	Short Position Value
FIGI Exchange ID	% Short Position
ISIN	Days to Cover
SEC ID	Average Daily Share Volume
Local Code	

### Denmark

Denmark Short Interest Fields data is updated daily. History is available from 1 November 2012. Fields available are:

FIGI Composite Ticker	Position Date
FIGI Global ID	Country Code
FIGI Exchange Ticker	Symbol
FIGI Exchange ID	Issuer Name
ISIN	US Code
SecID	Previous Disclosed Position Holder Total
Market ID	Disclosed Position Holder
Days to Cover	Average Daily Share Volume
Exchange Code	Security Description

### Finland

Finland Short Interest Fields data is updated daily. History is available from 31 October 2012. Fields available are:

FIGI Composite Ticker	Symbol
FIGI Global ID	Issuer Name
FIGI Exchange Ticker	US Code
FIGI Exchange ID	Previous Disclosed Position Holder Total
ISIN	Disclosed Position Holder
SecID	Days to Cover
Market ID	Average Daily Share Volume
Position Date	Exchange Code
Country Code	Security Description

### France

France Short Interest Fields data is updated daily. History is available from 3 October 2012. Fields available are:

FIGI Composite Ticker	SEC ID
FIGI Global ID	Issuer Name
FIGI Exchange Ticker	Security Description
FIGI Exchange ID	US Code
Market ID	Previous Disclosed Position Holder Total
Position Date	Disclosed Position Holder
Country Code	Days to Cover
Symbol	Average Daily Share Volume
ISIN	Exchange Code



### Germany

Germany Short Interest Fields data is updated daily. History is available from 26 October 2012. Fields available are:

FIGI Composite Ticker	SecID
FIGI Global ID	Issuer Name
FIGI Exchange Ticker	Security Description
FIGI Exchange ID	US Code
Market ID	Previous Disclosed Position Holder Total
Position Date	Disclosed Position Holder
Country Code	Days to Cover
Symbol	Average Daily Share Volume
ISIN	Exchange Code

### Greece

Greece Short Interest Fields data is updated daily. History is available from 14 June 2016. Fields available are:

FIGI Composite Ticker	SEC ID
FIGI Global ID	Issuer Name
FIGI Exchange Ticker	Security Description
FIGI Exchange ID	US Code
Market ID	Previous Disclosed Position Holder Total
Position Date	Disclosed Position Holder
Country Code	Days to Cover
Symbol	Average Daily Share Volume
ISIN	Exchange Code

### Hong Kong

Hong Kong data is updated daily. History is available from 3 January 2014. Fields available are:

FIGI Composite Ticker ISIN	
FIGI Global ID Local Code	
FIGI Exchange Ticker SEC ID	
FIGI Exchange ID Security Description	
Short Volume Previous Balance Short Position	
Short Volume Short Position Value	
Short Trades Value Currency	
Symbol US Code	

### Hungary

Hungary Short Interest data is updated daily. History is available from 11 September 2017. Fields available are:

FIGI Composite Ticker	SEC ID
FIGI Global ID	Issuer Name
FIGI Exchange Ticker	Security Description
FIGI Exchange ID	US Code
Market ID	Previous Disclosed Position Holder Total
Position Date	Disclosed Position Holder
Country Code	Days to Cover
Symbol	Average Daily Share Volume
ISIN	Exchange Code



### Ireland

Ireland data is updated daily. History is available from 1 November 2012. Fields available are:

FIGI Composite Ticker	Country Code
FIGI Global ID	Symbol
FIGI Exchange Ticker	ISIN
FIGI Exchange ID	SEC ID
Market ID	Issuer Name
Position Date	Security Description
US Code	Days to Cover
Previous Disclosed Position Holder Total	Average Daily Share Volume
Disclosed Position Holder	Exchange Code

### Israel

Israeli data is updated daily. History is available from July 2010. Fields available are:

FIGI Composite Ticker	Short Position Previous Balance
FIGI Global ID	Short Position
FIGI Exchange Ticker	Short Position Value
FIGI Exchange ID	Days to Cover
ISIN	Short Volume Previous Balance
Local Code	Short Volume
Security Description	

### Italy

Italy data is updated daily. History is available from 6 November 2012. Fields available are:

FIGI Composite Ticker	SEC ID
FIGI Global ID	Issuer Name
FIGI Exchange Ticker	Security Description
FIGI Exchange ID	US Code
Market ID	Previous Disclosed Position Holder Total
Position Date	Disclosed Position Holder
Country Code	Days to Cover
Symbol	Average Daily Share Volume
IŚIN	Exchange Code

### Japan

Japan data is updated daily. History is available from 1 August 2018. Fields available are:

FIGI Composite Ticker	Security Description
FIGI Global ID	Days to Cover
FIGI Exchange Ticker	Average Daily Share Volume
FIGI Exchange ID	Previous Disclosed Position Holder Total
ISIN	Disclosed Position Holder Total
Local Code	

### Korea

Korean data is updated daily. Fields available are:

FIGI Composite Ticker	Security Description
FIGI Global ID	Days to Cover
FIGI Exchange Ticker	Average Daily Share Volume
FIGI Exchange ID	Previous Disclosed Position Holder Total
ISIN	Disclosed Position Holder Total
Local Code	



### Malaysia

Malaysia data is updated daily. History is available from 06 August 2018. Fields available are:

FIGI Composite Ticker	Local Code	
FIGI Global ID	Value Currency	
FIGI Exchange Ticker	Short Volume	
FIGI Exchange ID	Short Volume Value	
ISIN	Security Description	

### Mexico

Mexico data is updated daily. History is available from 01 February 2019. Fields available are:

FIGI Composite Ticker	SEC ID
FIGI Global ID	Security Description
FIGI Exchange Ticker	Short Volume
FIGI Exchange ID	Short Position
ISIN	Short Position Previous Balance

### **Netherlands**

Netherlands data is updated daily. History is available from 17 April 2014. Fields available are:

FIGI Composite Ticker	SEC ID
FIGI Global ID	Issuer Name
FIGI Exchange Ticker	Security Description
FIGI Exchange ID	US Code
Market ID	Previous Disclosed Position Holder Total
Position Date	Disclosed Position Holder
Country Code	Days to Cover
Symbol	Average Daily Share Volume
ISIN	Exchange Code

### **New Zealand**

New Zealand data is updated daily. History is available from 1 March 2019. Fields available are:

FIGI Composite Ticker	SEC ID
FIGI Global ID	Local Code
FIGI Exchange Ticker	Short Position
FIGI Exchange ID	Short Trades
ISIN	

### Norway

Norway data is updated daily. History is available from 29 November 2018. Fields available are:

FIGI Composite Ticker	Security Description
FIGI Global ID	Short Position
FIGI Exchange Ticker	% Short Position
FIGI Exchange ID	Short Position Previous Balance
ISIN	Days to Cover
Local Code	Average Daily Share Volume
Previous Balance	US Code
Reported Date	SEC ID



### Peru

Peru data is updated daily. Fields available are:

FIGI Composite Ticker	SEC ID
FIGI Global ID	Local Code
FIGI Exchange Ticker	Short Volume
FIGI Exchange ID	Short Volume Value
ISIN	Short Position

### **Poland**

Poland data is updated daily. History is made available from 1 November 2012. Fields available are:

FIGI Composite Ticker	SEC ID
FIGI Global ID	Issuer Name
FIGI Exchange Ticker	Security Description
FIGI Exchange ID	US Code
Market ID	Previous Disclosed Position Holder Total
Position Date	Disclosed Position Holder
Country Code	Days to Cover
Symbol	Average Daily Share Volume
ISIN	Exchange Code

# **Portugal**

Portugal data is updated daily. Fields available are:

FIGI Composite Ticker	SEC ID
FIGI Global ID	Issuer Name
FIGI Exchange Ticker	Security Description
FIGI Exchange ID	US Code
Market ID	Previous Disclosed Position Holder Total
Position Date	Disclosed Position Holder
Country Code	Days to Cover
Symbol	Average Daily Share Volume
IŚIN	Exchange Code

### Spain

Spain data is updated daily. History is made available from 10 June 2010. Fields available are:

FIGI Composite Ticker	SEC ID
FIGI Global ID	Issuer Name
FIGI Exchange Ticker	Security Description
FIGI Exchange ID	US Code
Market ID	Previous Disclosed Position Holder Total
Position Date	Disclosed Position Holder
Country Code	Days to Cover
Symbol	Average Daily Share Volume
ISIN	Exchange Code

### Singapore

Singapore data is updated daily. History is available from 11 March 2013. Fields available are:

FIGI Composite Ticker	ISIN
FIGI Global ID	SEC ID
FIGI Exchange Ticker	Issuer Name
FIGI Exchange ID	Security Description
Market ID	US Code
Position Date	Short Volume
Country Code	Short Volume Value
Symbol	Short Position



### South Korea

South Korea Short Interest Fields Data is available daily. History is available from May 2019. Fields available are:

FIGI Composite Ticker	% Short Position	
FIGI Global ID	Short Position	
FIGI Exchange Ticker	Short Volume Value	
FIGI Exchange ID	% Short Volume Value	
ISIN	Short Volume	
Local Code	% Short Volume	
SEC ID	Short Position Value	

### Sweden

Sweden Short Interest Fields Data is available daily. History is available from 1 November 2012. Fields available are:

FIGI Composite Ticker	Symbol
FIGI Global ID	IŠÍN
FIGI Exchange Ticker	SEC ID
FIGI Exchange ID	Issuer Name
Market ID	Security Description
Position Date	US Code
Country Code	Days to Cover
Previous Disclosed Position Holder Total	Average Daily Share Volume
Disclosed Position Holder	Exchange Code

### Taiwan

Taiwan Short Interest Fields Data is available daily. History is available from 22 August 2018. Fields available are:

FIGI Composite Ticker	Local Code
FIGI Global ID	Short Position Prev Balance
FIGI Exchange Ticker	Reported Date
FIGI Exchange ID	Security Description
ISIN	Short Position

### Thailand

Thailand data is updated daily. History is available from 24 April 2017. Fields available are:

FIGI Composite Ticker	Security Type
FIGI Global ID	Symbol
FIGI Exchange Ticker	ISIN
FIGI Exchange ID	SEC ID
Short Volume Previous Balance	Issuer Name
Short Volume	Security Description
Short Position Previous Balance	Value Currency
Short Position	US Code
MarketID	



### Turkey

Turkey data is updated daily. History is available from 01 Jan 2016. Fields available are:

FIGI Composite Ticker	Value Currency	
FIGI Global ID	Reported Date	
FIGI Exchange Ticker	Security Description	
FIGI Exchange ID	Short Volume	
ISIN	Short Volume Value	
Local Code	Short Trades	

### **United Kingdom**

United Kingdom data is updated daily. History is made available from 31 October 2012. Fields available are:

FIGI Composite Ticker	ISIN
FIGI Global ID	Security Description
FIGI Exchange Ticker	US Code
FIGI Exchange ID	Previous Disclosed Position Holder Total
Market ID	Disclosed Position Holder
Position Date	Days to Cover
Country Code	Average Daily Share Volume
SECID	Exchange Code
Symbol	

### United States (US) Finra Short Volume Report

US Finra Short Volume Report\* data is updated daily. History is available from 1 January 2014. Fields available are:

FIGI Composite Ticker	Security Description
FIGI Global ID	Value Currency
FIGI Exchange Ticker	US Code
FIGI Exchange ID	Local Code
Market ID	Market
Symbol	Short Volume
ISIN	Short Volume Exempt
SEC ID	Short Volume Previous Balance
Issuer Name	

Market values are NASDAQ (for NQ TRF), ADF, ORF, NYSE (for NYX TRF)

### United States (US) Finra OTC

US Finra OTC\* data is updated bi-weekly. History is available from 14 November 2014. Fields available are:

FIGI Composite Ticker	Security Description
FIGI Global ID	Value Currency
FIGI Exchange Ticker	US Code
FIGI Exchange ID	SEC ID
Market ID	Market
Symbol	Short Position Previous Balance
IŚIN	Short Position
SEC ID	Days to Cover
Issuer Name	Average Daily Share Volume

Market values are OTC Securities



### Countries Which Permit Short Selling but Have No Activity

The following countries permit short selling but there is currently no activity. EDI monitors these markets and will provide updates if / when there is activity.

- Bulgaria
- India
- Philippines

- Croatia
- Latvia
- Romania

- Cyprus
- Lithuania
- Saudi Arabia

- Czech Republic
- Luxembourg
- Slovakia

- Estonia
- Malta

### Restrictions

EDI data will include notifications of restrictions to the short selling regulations as provided by the market regulator and/or exchange. This data will include:

- FIGI Global ID
- SEC ID
- FIGI Exchange ID
- Start date
- FIGI Exchange Ticker
- End date
- FIGI Composite Ticker
- Description of restriction

Country

Link to regulatory notice

Local code

ISIN

• US Code

There is also a section on EU restrictions:

For EU countries, additional restrictions may apply, and EDI will include a list of those shares as published on the ESMA registers.

This is a daily file and includes the following:

- FIGI Global ID
- FIGI Exchange Ticker
- Local code
- ISIN
- US Code
- SEC ID
- Start data
- Description of restriction/Regulating Authorization



### Short Selling Time Reporting Rules

### **Country Code**

Australia AU

Australia requires reporting short positions exceeding \$100,000 and 0.01% of the share class.

Report by 9 am next day capturing all short sales executed up to 7 pm.

The total of short positions for financial products on a given reporting day will be published on the ASIC website four days after the reporting day (T+4). These reports will not contain short seller details.

### **Country Code**

Austria AT

Article 9(2) of the Short Selling Regulation establishes that "The relevant time for calculation of a net short position shall be at midnight at the end of the trading day on which the natural or legal person holds the relevant position. That time shall apply to all transactions irrespective of the means of trading used, including transactions executed through manual or automated trading, and irrespective of whether the transactions have taken place during normal trading hours. The notification or disclosure shall be made not later than at 15.30 on the following trading day. The times specified in this paragraph shall be calculated according to the time in the Member State of the relevant competent authority to whom the relevant position must be notified".

Article 9(4) of the Short-Selling Regulation determines that "The public disclosure of information set out in Article 6 shall be made in a manner ensuring fast access to information on a non-discriminatory basis. That information shall be posted on a central website operated or supervised by the relevant competent authority. The competent authorities shall communicate the address of that website to ESMA, which, in turn, shall put a link to all such central websites on its own website".



Belgium BE

Article 9(2) of the Short Selling Regulation establishes that "The relevant time for calculation of a net short position shall be at midnight at the end of the trading day on which the natural or legal person holds the relevant position. That time shall apply to all transactions irrespective of the means of trading used, including transactions executed through manual or automated trading, and irrespective of whether the transactions have taken place during normal trading hours. The notification or disclosure shall be made not later than at 15.30 on the following trading day. The times specified in this paragraph shall be calculated according to the time in the Member State of the relevant competent authority to whom the relevant position must be notified".

Article 9(4) of the Short-Selling Regulation determines that "The public disclosure of information set out in Article 6 shall be made in a manner ensuring fast access to information on a non-discriminatory basis. That information shall be posted on a central website operated or supervised by the relevant competent authority. The competent authorities shall communicate the address of that website to ESMA, which, in turn, shall put a link to all such central websites on its own website".

As explained in ESMA's Consultation Paper there are certain aspects of the SSR which provide a flexible approach. The deadline is 15:30 for publications of net short positions, this applies to both the notification and the disclosure. Competent authorities can receive notifications at this time, and they should then publish immediately.

### **Country Code**

Brazil BR

Q1) When do short sales need to be notified to the regulator?

In Brazil, we have a beneficial owner regime, meaning that every trade is cleared and settled with the investor identification. Besides, sellers shall have their stocks in a central securities depository (CSD) at the settlement time, implying that they have to own the stocks or borrow them. There is no naked short selling in Brazil. According to CVM Instruction 441/2006 (art. 2), only a financial market infrastructure licensed by CVM as a CSD can provide stock lending services and this institution shall inform daily the CVM about the operations done in its market.

Q2) When does the regulator publish the data?

The CVM does not publicize data regarding short selling. However, the CVM Instruction 441/2006 (art. 11) establishes that CSDs which provide stock lending services shall disclose, daily and for each security, the volume lent.

Considering that stock lending is to some extent a future settlement contract, provisions of the CVM Instruction 283/1998 also apply. Such Instruction determines that exchanges shall set exposure limits for each investor, intermediary and market. For transparency purposes, B3, the trading venue licensed in Brazil, also discloses in its web page the number of contracts traded per day.



Canada CA

### REPORTING PROCESS

To regulators: E-mail to TSX; Within 2 trading days; twice per month T+4 8 am - Consolidated Short Position Report available on IIROC website.

Country Code

Chile CL

Short sale operations to be notified by 6.30pm of the same trading day. Stock Exchange will publish short sales in their daily bulletin.

Country Code

China CN

Firms required to disclose short-selling trading information on a daily basis before 9:00 a.m. on the next trading day.

The stock exchange publishes short selling information of previous trading day in website before 9:15 a.m.

**Country Code** 

Denmark DK

Please be aware that Article 9(2) of the Short Selling Regulation establishes that "The relevant time for calculation of a net short position shall be at midnight at the end of the trading day on which the natural or legal person holds the relevant position. That time shall apply to all transactions irrespective of the means of trading used, including transactions executed through manual or automated trading, and irrespective of whether the transactions have taken place during normal trading hours. The notification or disclosure shall be made not later than at 15.30 on the following trading day. The times specified in this paragraph shall be calculated according to the time in the Member State of the relevant competent authority to whom the relevant position must be notified".

Article 9(4) of the Short-Selling Regulation determines that "The public disclosure of information set out in Article 6 shall be made in a manner ensuring fast access to information on a non-discriminatory basis. That information shall be posted on a central website operated or supervised by the relevant competent authority. The competent authorities shall communicate the address of that website to ESMA, which, in turn, shall put a link to all such central websites on its own website".



Finland FI

Please be aware that Article 9(2) of the Short Selling Regulation establishes that "The relevant time for calculation of a net short position shall be at midnight at the end of the trading day on which the natural or legal person holds the relevant position. That time shall apply to all transactions irrespective of the means of trading used, including transactions executed through manual or automated trading, and irrespective of whether the transactions have taken place during normal trading hours. The notification or disclosure shall be made not later than at 15.30 on the following trading day. The times specified in this paragraph shall be calculated according to the time in the Member State of the relevant competent authority to whom the relevant position must be notified".

Article 9(4) of the Short-Selling Regulation determines that "The public disclosure of information set out in Article 6 shall be made in a manner ensuring fast access to information on a non-discriminatory basis. That information shall be posted on a central website operated or supervised by the relevant competent authority. The competent authorities shall communicate the address of that website to ESMA, which, in turn, shall put a link to all such central websites on its own website".

As explained in ESMA's Consultation Paper there are certain aspects of the SSR which provide a flexible approach. The deadline is 15:30 for publications of net short positions, this applies to both the notification and the disclosure. Competent authorities can receive notifications at this time, and they should then publish immediately.

### **Country Code**

France FR

Article 9(2) of the Short Selling Regulation establishes that "The relevant time for calculation of a net short position shall be at midnight at the end of the trading day on which the natural or legal person holds the relevant position. That time shall apply to all transactions irrespective of the means of trading used, including transactions executed through manual or automated trading, and irrespective of whether the transactions have taken place during normal trading hours. The notification or disclosure shall be made not later than at 15.30 on the following trading day. The times specified in this paragraph shall be calculated according to the time in the Member State of the relevant competent authority to whom the relevant position must be notified".

Article 9(4) of the Short-Selling Regulation determines that "The public disclosure of information set out in Article 6 shall be made in a manner ensuring fast access to information on a non-discriminatory basis. That information shall be posted on a central website operated or supervised by the relevant competent authority. The competent authorities shall communicate the address of that website to ESMA, which, in turn, shall put a link to all such central websites on its own website".



Germany DE

Article 9(2) of the Short Selling Regulation establishes that "The relevant time for calculation of a net short position shall be at midnight at the end of the trading day on which the natural or legal person holds the relevant position. That time shall apply to all transactions irrespective of the means of trading used, including transactions executed through manual or automated trading, and irrespective of whether the transactions have taken place during normal trading hours. The notification or disclosure shall be made not later than at 15.30 on the following trading day. The times specified in this paragraph shall be calculated according to the time in the Member State of the relevant competent authority to whom the relevant position must be notified".

Article 9(4) of the Short-Selling Regulation determines that "The public disclosure of information set out in Article 6 shall be made in a manner ensuring fast access to information on a non-discriminatory basis. That information shall be posted on a central website operated or supervised by the relevant competent authority. The competent authorities shall communicate the address of that website to ESMA, which, in turn, shall put a link to all such central websites on its own website".

As explained in ESMA's Consultation Paper there are certain aspects of the SSR which provide a flexible approach. The deadline is 15:30 for publications of net short positions, this applies to both the notification and the disclosure. Competent authorities can receive notifications at this time, and they should then publish immediately.

Country Code

Greece GR

Article 9(2) of the Short Selling Regulation establishes that "The relevant time for calculation of a net short position shall be at midnight at the end of the trading day on which the natural or legal person holds the relevant position. That time shall apply to all transactions irrespective of the means of trading used, including transactions executed through manual or automated trading, and irrespective of whether the transactions have taken place during normal trading hours. The notification or disclosure shall be made not later than at 15.30 on the following trading day. The times specified in this paragraph shall be calculated according to the time in the Member State of the relevant competent authority to whom the relevant position must be notified".

Article 9(4) of the Short-Selling Regulation determines that "The public disclosure of information set out in Article 6 shall be made in a manner ensuring fast access to information on a non-discriminatory basis. That information shall be posted on a central website operated or supervised by the relevant competent authority. The competent authorities shall communicate the address of that website to ESMA, which, in turn, shall put a link to all such central websites on its own website".



Hong Kong HK

The reporting deadline is two business days following the last trading day of the previous week.

The data is typically published on the SFC's website three business days after the receipt of the short position reports.

Country Code

Hungary HU

Article 9(2) of the Short Selling Regulation establishes that "The relevant time for calculation of a net short position shall be at midnight at the end of the trading day on which the natural or legal person holds the relevant position. That time shall apply to all transactions irrespective of the means of trading used, including transactions executed through manual or automated trading, and irrespective of whether the transactions have taken place during normal trading hours. The notification or disclosure shall be made not later than at 15.30 on the following trading day. The times specified in this paragraph shall be calculated according to the time in the Member State of the relevant competent authority to whom the relevant position must be notified".

Article 9(4) of the Short-Selling Regulation determines that "The public disclosure of information set out in Article 6 shall be made in a manner ensuring fast access to information on a non-discriminatory basis. That information shall be posted on a central website operated or supervised by the relevant competent authority. The competent authorities shall communicate the address of that website to ESMA, which, in turn, shall put a link to all such central websites on its own website".



Ireland IE

Article 9(2) of the Short Selling Regulation establishes that "The relevant time for calculation of a net short position shall be at midnight at the end of the trading day on which the natural or legal person holds the relevant position. That time shall apply to all transactions irrespective of the means of trading used, including transactions executed through manual or automated trading, and irrespective of whether the transactions have taken place during normal trading hours. The notification or disclosure shall be made not later than at 15.30 on the following trading day. The times specified in this paragraph shall be calculated according to the time in the Member State of the relevant competent authority to whom the relevant position must be notified".

Article 9(4) of the Short-Selling Regulation determines that "The public disclosure of information set out in Article 6 shall be made in a manner ensuring fast access to information on a non-discriminatory basis. That information shall be posted on a central website operated or supervised by the relevant competent authority. The competent authorities shall communicate the address of that website to ESMA, which, in turn, shall put a link to all such central websites on its own website".

As explained in ESMA's Consultation Paper there are certain aspects of the SSR which provide a flexible approach. The deadline is 15:30 for publications of net short positions, this applies to both the notification and the disclosure. Competent authorities can receive notifications at this time, and they should then publish immediately.

### Country Code

Israel IL

Members shall report to the Exchange short sales carried out by them and the balance of short sales for each security, as specified below:

On the first trading day of each week members shall report to the Exchange the short sales carried out and the balance of short sales for each security, as of the last trading day of the preceding week.

The Exchange publishes the data every second trading day of the week, at the end of the day, weekly.



Italy IT

Article 9(2) of the Short Selling Regulation establishes that "The relevant time for calculation of a net short position shall be at midnight at the end of the trading day on which the natural or legal person holds the relevant position. That time shall apply to all transactions irrespective of the means of trading used, including transactions executed through manual or automated trading, and irrespective of whether the transactions have taken place during normal trading hours. The notification or disclosure shall be made not later than at 15.30 on the following trading day. The times specified in this paragraph shall be calculated according to the time in the Member State of the relevant competent authority to whom the relevant position must be notified".

Article 9(4) of the Short-Selling Regulation determines that "The public disclosure of information set out in Article 6 shall be made in a manner ensuring fast access to information on a non- discriminatory basis. That information shall be posted on a central website operated or supervised by the relevant competent authority. The competent authorities shall communicate the address of that website to ESMA, which, in turn, shall put a link to all such central websites on its own website".

As explained in ESMA's Consultation Paper there are certain aspects of the SSR which provide a flexible approach. The deadline is 15:30 for publications of net short positions, this applies to both the notification and the disclosure. Competent authorities can receive notifications at this time, and they should then publish immediately.

Country Code

Korea (South) IT

Outstanding short position by issue showed above is calculated by collecting outstanding short position by issue reported by the investor with a reporting obligation in compliance with the Article 180-2 of the Financial Investment Services and Capital Markets Act.

In accordance with the outstanding short position reporting system, an investor is obligated to report when the investor's outstanding short position meets the criteria below.

-When the ratio of the investor's net outstanding short position is at or below negative (-) 0.01% and the value of the net outstanding short position is at or below negative (-) KRW 100 million - When, regardless of the ratio, the value of the net outstanding short position is at or below (-) KRW 1 billion.

Since the investor is required to report outstanding short position until two days from T (when the reporting obligation arises), outstanding short position of two days before the day is provided.

(Please note that outstanding short position can be changed when the investor makes a new or modified report on the position after 18:00 on T+2 to the Financial Supervisory Service.)



Malaysia MY

Rule 8.30 requires a Participating Organization to report to the Exchange daily or in such other frequency as may be determined by the Exchange, in the format prescribed by the Exchange, the Net Short Position and any other information in relation to the Net Short Position as may be required by the Exchange from time to time.

From the SE: "We currently display the following EOD Regulated Short Selling information on Bursa's website."

Country Code

Mexico MX

Short sales must be notified by 3 pm on the day they take place. The regulator has up to 2 business days to publish the short sales.

Country Code

Netherlands NL

Article 9(2) of the Short Selling Regulation establishes that "The relevant time for calculation of a net short position shall be at midnight at the end of the trading day on which the natural or legal person holds the relevant position. That time shall apply to all transactions irrespective of the means of trading used, including transactions executed through manual or automated trading, and irrespective of whether the transactions have taken place during normal trading hours. The notification or disclosure shall be made not later than at 15.30 on the following trading day. The times specified in this paragraph shall be calculated according to the time in the Member State of the relevant competent authority to whom the relevant position must be notified".

Article 9(4) of the Short-Selling Regulation determines that "The public disclosure of information set out in Article 6 shall be made in a manner ensuring fast access to information on a non-discriminatory basis. That information shall be posted on a central website operated or supervised by the relevant competent authority. The competent authorities shall communicate the address of that website to ESMA, which, in turn, shall put a link to all such central websites on its own website".



New Zealand NL

Disclosure: There is no specific disclosure obligation in respect of either naked or covered short selling. However, there is a requirement that any short sales must be flagged by the "Trading Participant" as such in the Trading System but this information will not be released other than in an aggregated form per issuer.

From the SE: "Short sales are recorded here at the exchange. We don't publicly publish this data. It is available for purchase on a T+2 basis."

Country Code

Norway NO

Article 9(2) of the Short Selling Regulation establishes that "The relevant time for calculation of a net short position shall be at midnight at the end of the trading day on which the natural or legal person holds the relevant position. That time shall apply to all transactions irrespective of the means of trading used, including transactions executed through manual or automated trading, and irrespective of whether the transactions have taken place during normal trading hours. The notification or disclosure shall be made not later than at 15.30 on the following trading day. The times specified in this paragraph shall be calculated according to the time in the Member State of the relevant competent authority to whom the relevant position must be notified".

Article 9(4) of the Short-Selling Regulation determines that "The public disclosure of information set out in Article 6 shall be made in a manner ensuring fast access to information on a non-discriminatory basis. That information shall be posted on a central website operated or supervised by the relevant competent authority. The competent authorities shall communicate the address of that website to ESMA, which, in turn, shall put a link to all such central websites on its own website".

As explained in ESMA's Consultation Paper there are certain aspects of the SSR which provide a flexible approach. The deadline is 15:30 for publications of net short positions, this applies to both the notification and the disclosure. Competent authorities can receive notifications at this time, and they should then publish immediately.

**Country Code** 

Peru PE

The regulator receives the information on short sales in real time and also at the end of the trading day. The information must be published on the SE website on their daily bulletin at the end of the trading day.



Poland PL

Article 9(2) of the Short Selling Regulation establishes that "The relevant time for calculation of a net short position shall be at midnight at the end of the trading day on which the natural or legal person holds the relevant position. That time shall apply to all transactions irrespective of the means of trading used, including transactions executed through manual or automated trading, and irrespective of whether the transactions have taken place during normal trading hours. The notification or disclosure shall be made not later than at 15.30 on the following trading day. The times specified in this paragraph shall be calculated according to the time in the Member State of the relevant competent authority to whom the relevant position must be notified".

Article 9(4) of the Short-Selling Regulation determines that "The public disclosure of information set out in Article 6 shall be made in a manner ensuring fast access to information on a non-discriminatory basis. That information shall be posted on a central website operated or supervised by the relevant competent authority. The competent authorities shall communicate the address of that website to ESMA, which, in turn, shall put a link to all such central websites on its own website".

As explained in ESMA's Consultation Paper there are certain aspects of the SSR which provide a flexible approach. The deadline is 15:30 for publications of net short positions, this applies to both the notification and the disclosure. Competent authorities can receive notifications at this time, and they should then publish immediately.

### Country Code

Portugal PT

Article 9(2) of the Short Selling Regulation establishes that "The relevant time for calculation of a net short position shall be at midnight at the end of the trading day on which the natural or legal person holds the relevant position. That time shall apply to all transactions irrespective of the means of trading used, including transactions executed through manual or automated trading, and irrespective of whether the transactions have taken place during normal trading hours. The notification or disclosure shall be made not later than at 15.30 on the following trading day. The times specified in this paragraph shall be calculated according to the time in the Member State of the relevant competent authority to whom the relevant position must be notified".

Article 9(4) of the Short-Selling Regulation determines that "The public disclosure of information set out in Article 6 shall be made in a manner ensuring fast access to information on a non-discriminatory basis. That information shall be posted on a central website operated or supervised by the relevant competent authority. The competent authorities shall communicate the address of that website to ESMA, which, in turn, shall put a link to all such central websites on its own website".



Singapore SG

A person with a reportable short position must report his short position to MAS by lodging a Short Position Reporting Form within two business days after position day. This means that if the position day is a Friday, the form should be lodged by the following Tuesday; assuming that there are no public holidays in that week.

MAS publishes aggregate short position information of each security on its website every week.

Country Code

Spain ES

Article 9(2) of the Short Selling Regulation establishes that "The relevant time for calculation of a net short position shall be at midnight at the end of the trading day on which the natural or legal person holds the relevant position. That time shall apply to all transactions irrespective of the means of trading used, including transactions executed through manual or automated trading, and irrespective of whether the transactions have taken place during normal trading hours. The notification or disclosure shall be made not later than at 15.30 on the following trading day. The times specified in this paragraph shall be calculated according to the time in the Member State of the relevant competent authority to whom the relevant position must be notified".

Article 9(4) of the Short-Selling Regulation determines that "The public disclosure of information set out in Article 6 shall be made in a manner ensuring fast access to information on a non-discriminatory basis. That information shall be posted on a central website operated or supervised by the relevant competent authority. The competent authorities shall communicate the address of that website to ESMA, which, in turn, shall put a link to all such central websites on its own website".



Sweden SE

Article 9(2) of the Short Selling Regulation establishes that "The relevant time for calculation of a net short position shall be at midnight at the end of the trading day on which the natural or legal person holds the relevant position. That time shall apply to all transactions irrespective of the means of trading used, including transactions executed through manual or automated trading, and irrespective of whether the transactions have taken place during normal trading hours. The notification or disclosure shall be made not later than at 15.30 on the following trading day. The times specified in this paragraph shall be calculated according to the time in the Member State of the relevant competent authority to whom the relevant position must be notified".

Article 9(4) of the Short-Selling Regulation determines that "The public disclosure of information set out in Article 6 shall be made in a manner ensuring fast access to information on a non-discriminatory basis. That information shall be posted on a central website operated or supervised by the relevant competent authority. The competent authorities shall communicate the address of that website to ESMA, which, in turn, shall put a link to all such central websites on its own website".

As explained in ESMA's Consultation Paper there are certain aspects of the SSR which provide a flexible approach. The deadline is 15:30 for publications of net short positions, this applies to both the notification and the disclosure. Competent authorities can receive notifications at this time, and they should then publish immediately.

### Country Code

Taiwan TW

The TWSE takes a proactive approach to disclose short selling balances on daily basis; short sellers do not need to report it.

Availability on TWSE website: "The information provided here is updated each trading day around 20:30 and 22:30, respectively. Actual renewal time may differ due to daily closing procedures."

### Country Code

Thailand TH

The company shall prepare a report of the head office and branch (if any) in accordance with the form prescribed by the Exchange every end of business day and made through the Members Supervision and Examination Department, The Stock Exchange of Thailand, by BRS (Broker Reporting System) within 8.00 p.m. of each business day. In case that has not short sale items which have not yet been covered, the company shall file the report.

The company shall report for short selling for both the company's account and its customers which classified according to each individual security after less number of shares of each securities which have been covered for both purchasing in return securities of own company and other company.



Turkey TR

From the SE website: "Short selling transactions are announced on the Daily Bulletin on equity basis, stating the amount and contract quantity at each price level."

"No need to report any short sale transactions. Since Borsa Istanbul is the only trading venue in Turkey, all short sale transactions are realized in Exchange in normal order book."

Country Code

United Kingdom GB

Article 9(2) of the Short Selling Regulation establishes that "The relevant time for calculation of a net short position shall be at midnight at the end of the trading day on which the natural or legal person holds the relevant position. That time shall apply to all transactions irrespective of the means of trading used, including transactions executed through manual or automated trading, and irrespective of whether the transactions have taken place during normal trading hours. The notification or disclosure shall be made not later than at 15.30 on the following trading day. The times specified in this paragraph shall be calculated according to the time in the Member State of the relevant competent authority to whom the relevant position must be notified".

Article 9(4) of the Short-Selling Regulation determines that "The public disclosure of information set out in Article 6 shall be made in a manner ensuring fast access to information on a non-discriminatory basis. That information shall be posted on a central website operated or supervised by the relevant competent authority. The competent authorities shall communicate the address of that website to ESMA, which, in turn, shall put a link to all such central websites on its own website".

As explained in ESMA's Consultation Paper there are certain aspects of the SSR which provide a flexible approach. The deadline is 15:30 for publications of net short positions, this applies to both the notification and the disclosure. Competent authorities can receive notifications at this time, and they should then publish immediately.

Country Code

United States US

Firstly, firms are obligated to report short positions to FINRA twice a month. The short positions reflect a firm's accumulated short position in a security in effect at the end of the day on the settlement date, 15<sup>th</sup> of the month (or prior settlement date if the 15<sup>th</sup> falls on a weekend or holiday) and on the last settlement date of the month.

Secondly, when a broker-dealer executes a sale, it has an obligation to report the transaction within 10 seconds of execution and to indicate if the sale was long or short. The total number of shares sold short are compiled and published on a daily and monthly basis by the Exchanges, including FINRA, which reports the data for securities traded over-the- counter. The daily short sale transaction data includes all trades reported to the consolidated tape as a short sale during regular trading hours, i.e., 9:30 a.m. to 4 p.m. and reflects the total number of shares sold short that day.



# **Historical Dates**

Country Code	Market Name	Frequency	Start Date
AT	Austria_sint	Daily	2012-11-01
AU	Australia	Daily	2019-11-22
BE	Belgium_sint	Daily	2012-10-31
BR	Brazil	Daily	2020-01-10
CA	Canada	Monthly	2019-12-31
CA	Canada_CSE	Monthly	2019-05-15
CN	Shenzhen	Daily	2019-11-22
CN	Shanghai	Daily	2019-11-22
DE	Germany_sint	Daily	2012-10-26
DK	Denmark_sint	Daily	2012-11-01
ES	Spain_sint	Daily	2010-06-10
FI	Finland_sint	Daily	2012-10-31
FR	France_sint	Daily	2012-10-03
GB	UK_sint	Daily	2012-10-31
GR	Greece_sint	Daily	2016-06-14
HK	HongKong	Weekly	2019-11-22
HU	Hungary_sint	Daily	2017-09-11
IE	Ireland_sint	Daily	2012-11-01
IL	Israel	Weekly	2019-11-28
IT	Italy_sint	Daily	2012-11-06
JP	Japan_sint	Daily	2018-08-01
KR	Korea	Daily	2019-11-22
MX	Mexico	Daily	2019-11-22
MY	Malaysia	Daily	2019-11-21
NL	Netherlands_sint	Daily	2014-04-17
NO	Norway	Daily	2019-11-22
NZ	New_Zealand	Daily	2019-11-22
PL	Poland_sint	Daily	2012-11-01
PT	Portugal_sint	Daily	2017-03-08
SE	Sweden_sint	Daily	2012-11-01
SG	Singapore	Daily	2019-11-22
TH	Thiland	Daily	2020-03-22
TR	Turkey	Daily	2019-08-21
TW	Taiwan	Daily	2019-12-06
US	Finra	Daily	2014-11-22
US	Finra_OTC	Monthly	2014-03-13



### **United Kingdom - Headquarters**

5 Highgate Road, London, NW51JY

**United States** 

NJ 07724, USA

Exchange Data International Inc 106 Apple Street, Suite 102, Trinton Falls

**Telephone:** +1 607-238-4438

**Telephone:** +44(0) 2073 240 020

# Jonathan Bloch

Chief Executive Officer

**Cell:** +44(0) 7785 550 043

**Email**: j.bloch@exchange-data.com

### **Andrew Sabourin**

Head of Sales - UK, Europe and Asia

Work: +44(0) 2073 240 048 Cell: +44(0) 7931 906 569

**Contact Information** 

**Email:** a.sabourin@exchange-data.com

### Fiona Morf

Business Development Manager

**Cell:** +44(0) 7533 172 244

**Email:** f.morf@exchange-data.com

### **Ian Sissons**

Business Development Manager

**Cell:** +44(0) 7900 003 832

Email: i.sissons@exchange-data.com

### Nora Cervara

Head of Sales - North America

**Cell:** +1 732-670-1935

**Email:** n.cervara@exchange-data.com

### William Cowen

Business Development Manager

Cell: +1 267-670-2443

Email: w.cowen@exchange-data.com

### John Kirk

Business Development Manager

**Cell:** +1 908-768-7815

**Email:** j.kirk@exchange-data.com

### Latin America & South East USA

### **Nick Castro**

Business Development Manager

**Cell:** +1 954-261-1628

**Email:** n.castro@exchange-data.com

### South Africa

PO Box 2176

Cape Town 8000

## **Ilze Gouws**

Head of Economic Data & Sales

**Cell:** +27 (0) 82 782 3750

**Cell:** +44(0) 7517 857 896

**Email**: i.gouws@exchange-data.com

Director, International Business Strategy

**Email:** p.rajendran@exchange-data.com

### Morocco

Lot Founty imm Founty Plaza

**Telephone:** +212 528 262 013

### Michael Abraham

Samy Rajendran

Business Development Manager

**Cell:** +49 160 7188 340

**Email:** m.abraham@exchange-data.com

1er étage Agadir Morocco

Other Locations

(Incl. Austria, Bulgaria, Croatia, Czech Republic, Estonia, Germany, Hungary, Latvia, Lithuania, Moldova, Poland)