

Disclosure of Interests Online (DION) System Frequently Asked Questions

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Section 1: Background

1.1 What is the DION System?

The Disclosure of Interests Online System (“DION System”) is developed to facilitate the mandatory electronic filing and publication of DI notices under Part XV of the Securities and Futures Ordinance (Cap. 571). Filers should file disclosure of interests notifications (“DI Forms”) electronically through the DION System available on the HKEXnews website (<https://sdinotice.hkex.com.hk>).

To know more about the use of DION System, you may access about DION System webpage (https://www2.hkexnews.hk/Shareholding-Disclosures/Disclosure-of-Interests-Online-DION-System?sc_lang=en) where you can find interactive training program, video tutorials and other useful materials.

1.2 What is the software requirement for the DION System?

The DION System is best viewed under the following software specifications:

	For Windows	For Mac
Operating System	Microsoft Windows 10/11	Mac OS X 11
Browser	Microsoft Edge 124 Chrome 124 Firefox 99	Safari 16
PDF Forms input	Acrobat Reader DC	Acrobat Reader DC
Excel Forms input	Microsoft Excel 2016/ Microsoft Office 365	Not applicable (Excel DI Forms cannot be used in Excel for Mac)

(Updated in Oct 2024)

1.3 What is the operation hour of the DION System?

The DION System operates seven days a week and 24 hours a day (except during the system maintenance period).

1.4 Who should register as a DION System user?

Individual/corporate substantial shareholders, directors, chief executives of listed corporations and listed corporations (collectively “filers”) who are required to complete and file DI Forms pursuant to Part XV of the Securities and Futures Ordinance (Cap. 571) (the “SFO”) should register as DION System users.

Section 2: User Registration – for filing DI Forms

2.1 When and how can I register as a DION System user?

Filer needs to register online through the [DION System](#) before he/she can make his/her first DI Form submission.

2.2 What information will be required for the registration?

User is required to provide profile information (e.g. name, contact details) and an email address for account activation and maintenance. User will also need to create a user name (“User ID”) and password.

2.3 How long will the registration take and when can I start using the account?

It will take only a few minutes to complete the online registration process. As soon as the registration is completed, the DION System will send an account activation email to the registered email address. User is

required to activate the account within three days through the link provided on the activation email. The account can be used immediately after activation.

2.4 Is it necessary for a shareholder to register as a DION System user if such shareholder does not have any duty to file a DI Form?

No. Only those shareholders/directors/listed corporations that are required to file DI Forms under the SFO should register as a DION System user.

2.5 There is a user type “Listed corporations”. What is its use?

“Listed corporation” User ID is for submitting DI Form 4 or special notification (for listed corporations exempted under s.309 SFO).

2.6 During registration, there are two different fields requiring user to input email address. What is the reason for asking the user to provide two email addresses?

The email address provided by the user in the user profile page will be used to pre-fill the DI Form when the user downloads the DI Form after logging onto the DION System. This email address will also be used for identification purpose while the other email address called “Registered email address” will be used for account maintenance and User ID activation. These two email addresses can be the same.

2.7 Can an agent register as an agent user type and submit DI Forms on behalf of substantial shareholder(s) or submit DI Form 4 pursuant to section 330/333 of the SFO on behalf of listed corporations?

No. The DION System only allows three types of users to register as DION System users for filing DI Forms, namely (i) Individual substantial shareholders/Directors/Chief Executives (ii) Corporate substantial shareholders/Directors/Chief Executives and (iii) Listed corporations. The individual or corporation with disclosure obligation is expected to register their own account separately using one of the three user types as appropriate.

Same as the current practice, an individual or corporation who/which has disclosure obligation may authorise an agent to file DI Forms on behalf of the individual or corporation concerned. It is the responsibility of the individual or corporation who/which has an obligation to file the DI Forms to ensure the information on the DI Forms is correct and the forms are submitted within the time allowed.

2.8 I am the company secretary of a listed corporation. Should each of the directors register his/her own User ID?

Each director is required to have his/her own DION System account before he/she can submit DI Forms through the DION System. The DION System will validate whether the uploaded DI Form(s) is/are relating to the logged in User ID and will reject the submission if any exceptions are found in the DI Forms.

2.9 Can the same filer register for more than one account?

We strongly advise that an individual or a corporation who/which has a disclosure obligation under Part XV of the SFO to register only one account in the DION System so that filings made by such individual or corporation can be grouped and displayed properly on the HKEXnews website. However, the system does not prohibit the same filer from registering more than one account with the same profile information (such as the name of a substantial shareholder or director).

2.10 Should a DION System user register for a new account if there is a change in certain key profile information, e.g. name and/or passport number?

No. It is not necessary to register for a new account. Instead, registered DION System user should update his/her/its profile information by using “User Profile Maintenance” function. Please also refer to [Question 3.5](#).

2.11 During the registration process, I was asked to indicate whether I have previously registered. What should I choose if I cannot remember?

If you select “Yes”, you will need to provide your previously registered User ID and related information. If you are not sure whether you have registered before and would like to create an account anyway, you can proceed by selecting “No”. In case you subsequently find that you have registered for more than one account(s), you may use “User Profile Maintenance” function to merge the account(s) under one User ID.

2.12 I have forwarded the email containing the activation link from the registered email account to another email account. When I click on the activation link in the forwarded email, it cannot bring me to the activation page. What can I do?

When an activation email is forwarded to another email address, the activation link may become invalid as the format of the activation email may have been altered. User should use the activation link provided in the email received directly from the DION System. **(Updated in May 2018)**

2.13 What should I do if I did not receive the activation email?

If you did not receive the activation email, please first check your mailbox folder for spam email as it may possibly be identified as spam by your email server. In case you need HKEX to resend the activation email, you can send an email request to DI-Filings@hkex.com.hk. Please note that the email must be sent from (or copied to) the registered email address. Please also quote your registration reference number in your email request for identification purpose. **(Updated in May 2018)**

Section 3: User Account Maintenance

3.1 What can I do if I forgot my User ID?

You can use the “Forgot User ID” function on the DION System login page. Follow the instructions and the DION System will send the User ID(s) to your registered email address.

3.2 What can I do if I forgot my user password or my account was locked?

You can use the “Forgot User Password” function on the DION System login page. Follow the instructions and the DION System will send a link to your registered email address for resetting password and unlocking your account.

3.3 How do I change my User password?

You can change your password by using “Change Password” function which can be found in the menu located at the top left-hand corner of the webpage after logging onto the DION System.

3.4 Will user password be expired?

Yes, user password will be expired after 90 calendar days. Upon password expiry, users must change their passwords on next login. Users will be redirected to the “Change Password” page where they can change their passwords for gaining access to the DION System. **(Added in Oct 2022)**

3.5 How do I update my user profile information?

You can update your profile information by using “User Profile Maintenance” function which can be found in the menu located at the top left-hand corner of the webpage after logging onto the DION System.

3.6 Will my account be removed if I have not filed DI Forms for a long period of time?

User account will not be removed as long as DI Forms have been submitted through this User account within the first 90 days after its activation. To improve system efficiency, User account will be removed if no DI Form is submitted through this User account within the first 90 days after its activation.

3.7 When does one use the function “Deactivate this user account” under “User Profile Maintenance” function?

If you consider that you will no longer be a filer of DI Forms, you can use this function to deactivate your account including your own User ID (but not other filers’ User IDs). Once you have confirmed the deactivation, you will be logged out of the system immediately and can no longer log onto the system again with that User ID. Also, the deactivated User ID cannot be reactivated or merged with any other User IDs.

3.8 There is a “Merge User ID” feature in the DION System. What is it and how does it work?

This function allows users to merge multiple User IDs created for the same individual or corporation with disclosure obligation. If the same filer uses different User IDs to file DI Forms in respect of interests in the same listed corporation, the DI Forms will be shown as having been filed by different users. This will affect the HKEXnews website’s search results as the reported interests filed by different User IDs will not be consolidated. To address this issue, the DION System has a “Merge User ID” feature to allow the user to merge User IDs. By merging the User IDs, DI Forms filed under different User IDs will be processed and shown as if they were filed by the same individual or corporation.

3.9 For listed corporation user account, will this type of account be automatically removed when the concerned corporation is delisted from the Exchange?

No. Users should deactivate their accounts by themselves through the “User Profile Maintenance” function. (Updated in May 2018)

Section 4: Excel/PDF Form

4.1 Where can I find the DI Forms and instructions?

The DI Forms and instructions can be downloaded from the [SFC website](#) or the [DION System](#). (Updated in May 2018)

4.2 Where can I find a list of new codes?

The list of codes can be found in each DI Form together with its accompanying directions and instructions for completion. A list of new codes can also be found on the [SFC website](#).

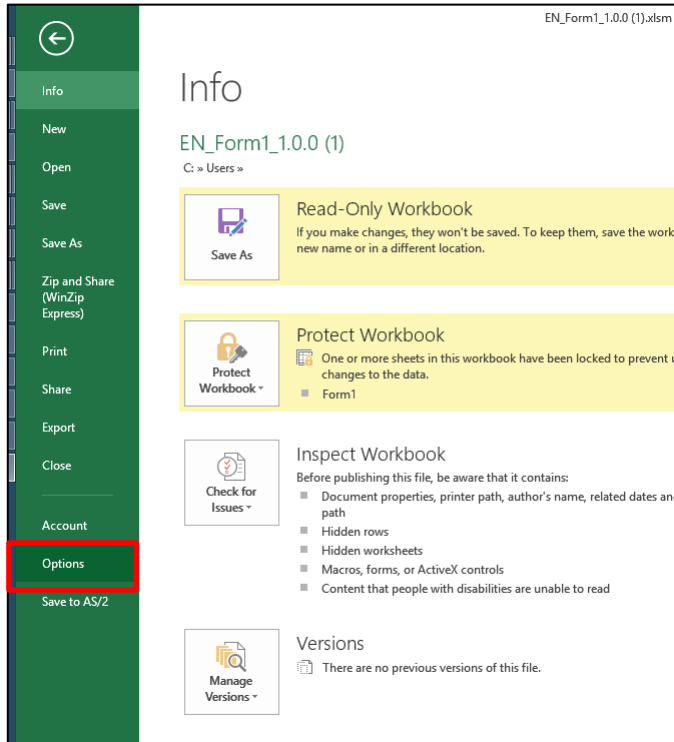
4.3 I have questions on how to fill in the new DI Forms. Should I contact SFC or HKEX?

Neither the SFC nor HKEX advises the public on how to fill in the DI Forms or answer queries on individual cases. SFC has published an [Outline of Part XV](#) on its website (under section of “Guidelines on Disclosure of Interests”) which gives extensive guidance on the situations in which a DI Form will have to be filed, and all related matters. You may refer to the directions and instructions therein for detailed guidance and examples on how to complete the boxes on each form. You should consult your professional advisers if you have questions when completing the new DI Forms.

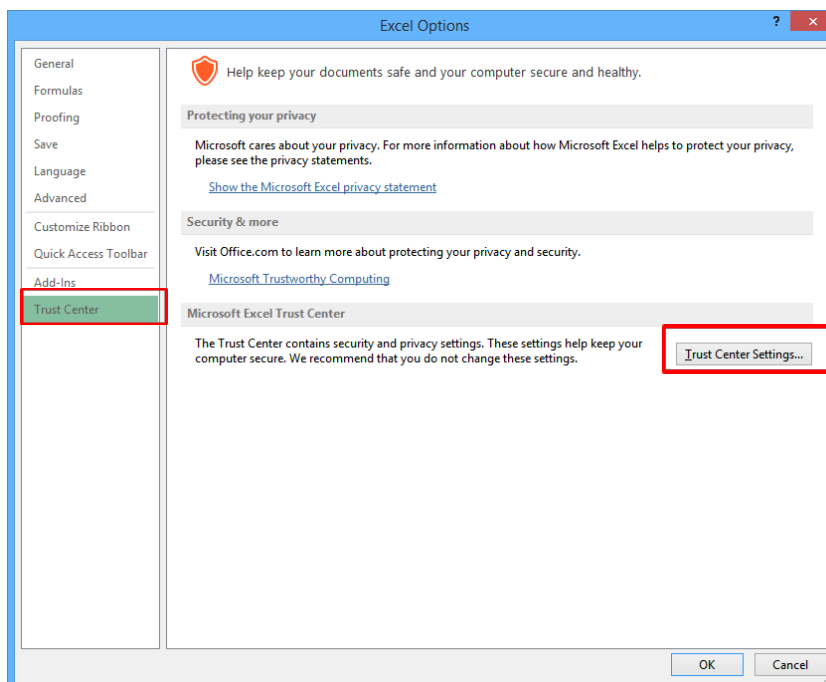
4.4 No validation was performed when I was filling in the Excel version of the DI Forms. Also, there was no response when I double clicked on the standard code input fields. How can I enable these features?

You need to enable macros in your Excel to turn on features of the DI Forms. To enable macros in your Excel, please follow the steps below **BEFORE** opening the DI Form.

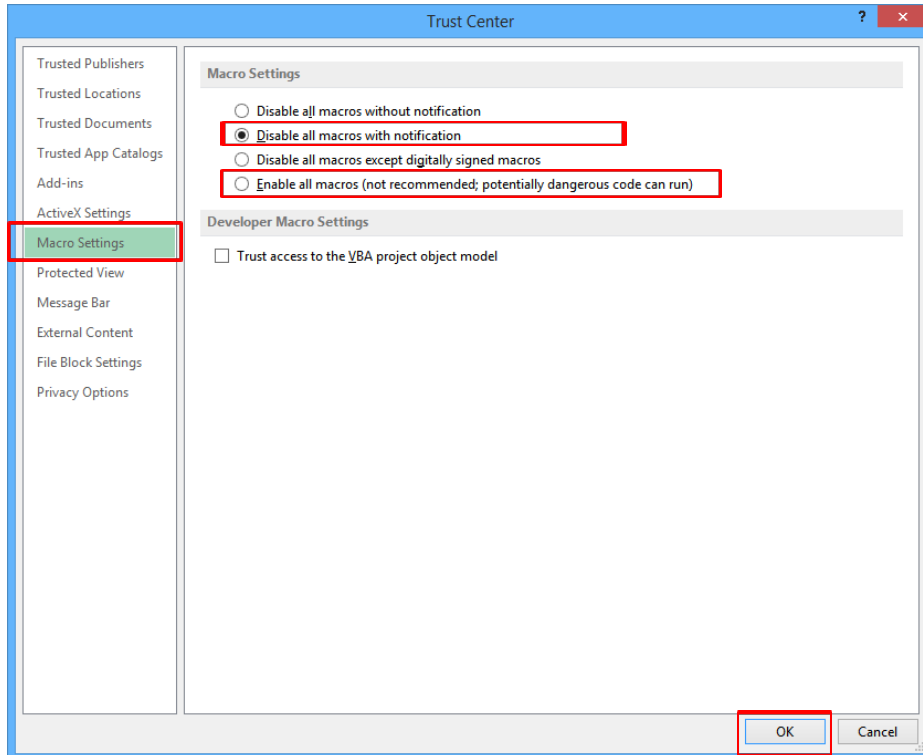
Click "File" -> "Options" in your Excel program.



Then, click "Trust Center" and "Trust Center Settings"



Under "Macro Settings", you should choose "Disable all macros with notification" or "Enable all macros".



If you choose **"Disable all macros with notification"**- the 2nd choice on the above screen, you will see a yellow bar when you open the DI Form. You need to click "Enable content" when you open the DI Form.
If you choose **"Enable all macros"** - the 4th choice on the above screen, macros will automatically be turned on when you open the DI Form.

4.5 (Removed in May 2022)

4.6 (Removed in May 2022)

4.7 Why is there a problem when I open an Excel form in Mac OS?

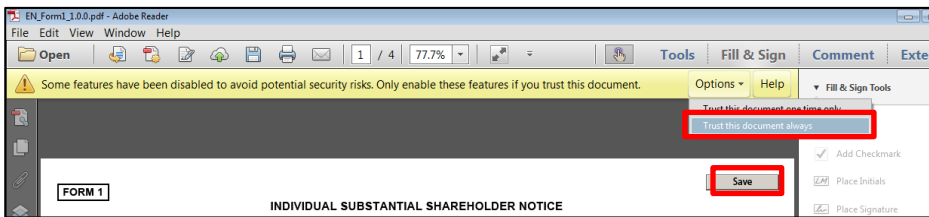
The DION System does not support Excel forms in Mac OS. Users may use PDF form for submission of DI Forms through the DION System if he/she is a Mac OS user.

4.8 Does the DION System support alternative third party software for editing the DI Forms?

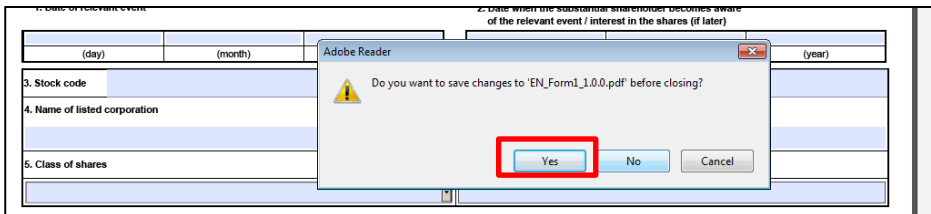
No. We advise users not to use third party software to edit the DI Forms. If third party software is used (e.g. third party PDF readers), it is likely that certain features in the PDF DI Form will be affected and will not function properly. It is recommended that users should follow the best viewed configuration setting without installing any third party software to the same computer. Please also refer to [Question 1.2](#).

4.9 There is a yellow message bar on the screen when I opened PDF DI Form, what should I do?

If your PDF DI Forms were downloaded from the DION System or SFC website, you should choose "Trust this document always" from the yellow message bar.



In the pop-up box on the 2nd screenshot below, please choose “Yes”. You will see validation errors as the form will go through form validation once it is saved.



After you have clicked “Trust this document always” from the yellow message bar, this PDF is enabled by the system to (i) retrieve the name of listed corporation, and (ii) check if the form version is the latest one. Otherwise, these two features will be disabled while you may still continue to use the PDF forms.

4.10 When I open the DI Forms (Excel / PDF), a message box displaying "There is no connection to the server. You may still continue to complete the form in an off-line mode." pops up. What does it mean?

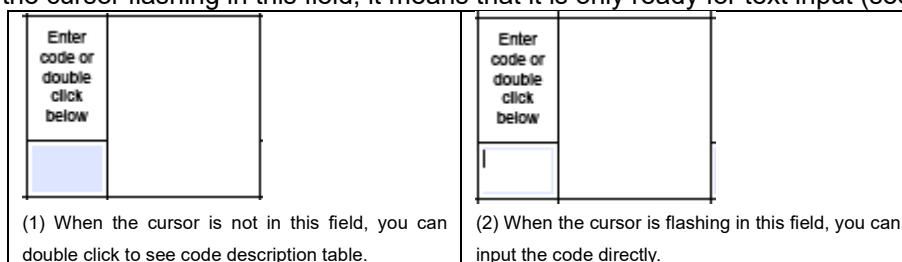
DI Forms (both Excel and PDF) contain online features. This message will be shown if your computer is not connected to the Internet. You may still complete the DI Form without Internet connection. However, the online features of the DI Forms will be disabled. Therefore, you will need to input the “Name of Listed Corporation” manually as autofill feature in this field will be disabled. Also, there will not be any alert messages if you are using the older version of DI Forms.

4.11 When I download the PDF DI Forms with Chrome, the message "The document you are trying to load requires Adobe Reader 8 or higher. You may not have the Adobe Reader installed or your viewing environment may not be properly configured to use Adobe Reader" pops up, what should I do?

Since the Chrome browser opens PDF document by its bundled "Chrome PDF Viewer" by default, the PDF DI Forms cannot be viewed in this mode. Instead of opening the DI Form directly, you should save the DI Form in your computer and open it in Adobe Reader version suggested in [Question 1.2](#) in order to view the form.

4.12 Why is there no response when I double click on the standard code input fields in the PDF forms?

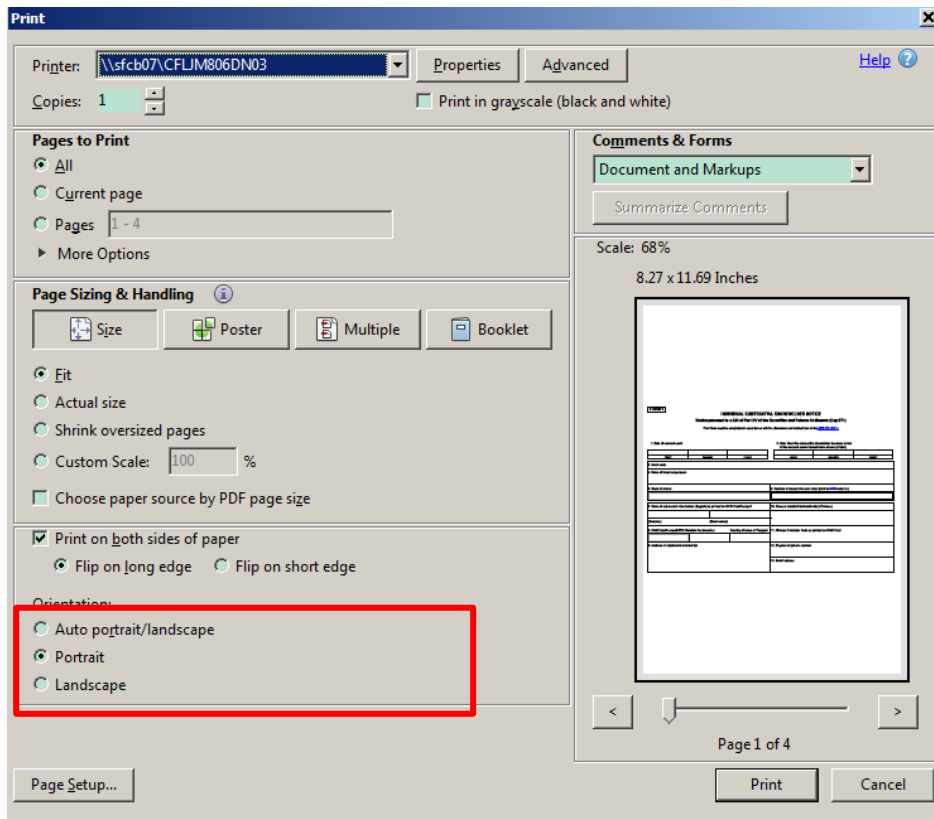
You can only get a response when you double click while the cursor is not in the input field (see left image below). If you see the cursor flashing in this field, it means that it is only ready for text input (see right image below).



Please also make sure you are using the PDF reader which the system supports as described in [Question 1.2](#).

4.13 Why are the PDF forms printed out in portrait?

You can configure the printout orientation in the print setup page. You should select "Landscape" in "Orientation" to print it out in landscape.



4.14 What is expected to be provided in the “Supplementary information” box of the DI Forms? Will the information provided in the “Supplementary information” box be publicly available?

Supplementary information such as the class of shares has to be provided if user selects “Other” in the “Class of shares” box. Other supplementary information may include the reason for the change in percentage level of interest in shares if none of the event code is applicable. In this case, the percentage level of interest in shares may be reduced solely because of a change in the issued share capital of the listed corporation. All information provided in the “Supplementary information” box will be displayed on HKEXnews website.

You may refer to the directions and instructions for completion of the relevant DI Forms with details on how to complete the “Supplementary information” box.

4.15 The “date of filing this Form” box is not in the DI Forms, how do I record my filing date?

Users are not required to fill in the date of filing in the DI Forms. The system will record the “Date/Time of Filing” in the acknowledgement page which is generated by the DION System. **(Updated in May 2022)**

4.16 After I input the stock code of a listed corporation, there was an alert saying “No matching results are found for the inputted stock code”. What does it mean?

The alert message means that the DION system cannot find a matched listed corporation name based on the relevant event date and stock code input into the system. Please check and re-input a correct stock code and a relevant event date (note: the stock code of a newly listed corporation will become valid with effect from its listing date). **(Updated in May 2018)**

4.17 How can I make revision to a previously submitted DI Form?

To revise a previously submitted DI Form, you should use the same User ID to log onto DION System and submit a revised DI Form. Please note that the revised DI Form should be checked with the box “check this box if this is a revision of a previously submitted form” and input with the serial number of the DI Form you are going to revise. **(Added in Feb 2020)**

4.18 A revised DI Form is submitted before the publication of the DI Form to be revised, can the DI Form to be revised be withheld from publication? How will the DI Form be indicated as a revised one?

No, all DI Forms received through DION System will be published on HKEXnews website according to the publication schedule (refer to [Question 6.2](#)). If you manage to submit a revised DI Form before the DI Form being revised is published, it is possible that both DI Forms are published at the same time.

Once there is a revised DI Form published on HKEXnews website, a remark of “Amendment to [serial number of DI Form being revised]” will be displayed next to the serial number of the revised DI Form. Similarly, another remark of “Superseded by [serial number of the revised DI Form]” will be displayed next to the serial number of the DI Form being revised. **(Updated in May 2022)**

Section 5: Form Submission

5.1 How do I download and submit DI Forms after I logged onto the DION System?

A menu bar will be shown after you clicked on this symbol "≡" located at the top left-hand corner of the page. You can then choose the desired function from the dropdown menu to continue with the submission process.



5.2 During DI Form submission, the warning message popped up only once. But when I clicked on the submit button again, there was no response. What should I do?

You should not set to prohibit the pop-up message boxes from displaying on the screen. Some browsers (such

as Chrome or Firefox) offer the option to users to prevent the error message from creating additional dialogs by checking the checkbox shown below:

Number of investigation report(s) uploaded does not match with the number stated in the DI form. You may still proceed if no correction is needed. Do you want to continue?

Warning: Inconsistent information - You have uploaded 0 concert party document(s). However, the "Number of concert party document(s)" box in the form is 2.

Confirm to submit?

☐ Prevent this page from creating additional dialogs.

OK Cancel

Do not check this box, otherwise, the error message will not display again. If the setting of your computer prohibits pop-up message boxes from displaying on the screen, you need to reload the page to allow the display of the alert messages or restart the submission process again.

5.3 (Removed in May 2022)

5.4 I received error messages, such as "Please fill in up to 20 Chinese characters" and "Invalid data is found in the form. Please note that "Tab", "Enter", and "Return" keys are not allowed for input" when completing the DI Forms. What do these error messages mean?

The general rule is that Chinese input fields accept only Traditional Chinese or Simplified Chinese characters. No English or punctuation marks are accepted. For all input boxes, "Tab", "Enter" and "Return" keys are not allowed. For instance, if you use "Enter" key to separate your input data into two rows in supplementary information box, the error message will pop-up to remind you not to do so. Please read the error message and update the form accordingly.

5.5 After I uploaded a DI Form, a warning message "You are using an outdated form. Please download the latest version from DION System" popped up. What does it mean?

This means that there is a new version of DI Form available. You should download the latest version of DI Form from the [SFC website](#) or the [DION System](#) for submission. (Updated in May 2018)

5.6 Is there any file name restriction on files submitted through the DION System?

Yes. Please avoid using symbols or special characters when creating a file name. Unacceptable symbols and special characters include but not limited to the following: '!#\$%^&*+=-[]';,/{}|":<>?. (Updated in May 2018)

5.7 Can I check my submission status in the DION System?

No. You can only check if your submission has been published on the [HKEXnews](#) website (refer to [Question 6.2](#)). If you could not find your submission on the HKEXnews website, you may contact the DION System enquiry telephone line at (852) 2295 4811 during office hours for assistance. (Updated in Feb 2020)

5.8 Is there a session timeout set in the DION System?

Yes. Users will be automatically logged out after 15 minutes of inactivity. (Updated in May 2018)

Section 6: Publication of DI Forms

6.1 Where can I find the published DI Forms?

DI Forms are published in the Disclosure of Interests page of the [HKEXnews](#) website. If you have problem in searching the DI Form, you may contact DION System enquiry telephone line at (852) 2295 4811 during office hours for assistance. **(Updated in May 2022)**

6.2 I have just submitted a DI Form through the DION System, when will it be published on the HKEXnews website?

DI Forms are published on the HKEXnews website at 5:00 p.m. (HK time) on every normal business day. If a DI Form was successfully submitted before 5:00 p.m. (HK time) on a normal business day through the DION System, it will be published on the HKEXnews website at 5:00 p.m. (HK time) on the same day.

For half-day trading day, the publication time will be advanced from 5:00 p.m. to 1:00 p.m. (HK time). This means that DI Forms successfully submitted before 1:00 p.m. on half-day trading day will be published on the same day. **(Updated in Feb 2020)**

6.3 How do I view the concert party document(s) filed together with the DI Form?

Concert party document(s) filed together with the DI Forms can be viewed by clicking the hyperlink provided in the DI Forms published on the HKEXnews website. Such DI Forms can be viewed by clicking the relevant event date or the serial number on the designated page in the HKEXnews website.

Regarding the Concert party agreements and related papers filed with the Stock Exchange under s.326(6) of the SFO (in respect of notices filed through means other than DION System from 1 April 2003 to 2 October 2017), online viewing is not available. Public enquirers should contact HKEX at (852) 2295 4811 prior to onsite inspection at HKEX office. **(Updated in May 2022)**

6.4 (Removed in May 2022)

6.5 How do I search for the DI Forms filed for domestic shares (applicable for H-share corporations) on the HKEXnews website?

You can input the H share stock code or stock name to make a search. The search results would return with filings made in respect of its domestic shares (if any). **(Updated in May 2018)**

Section 7: Email Notification to Listed Issuers and Access to the DION System

7.1 I received email notification about new DI Forms filed through the DION system concerning my company. Who may logon to the DION System to view and download such DI Forms?

Each existing listed issuer should have been registered in the E-Submission System (ESS) with an Authorised Person (AP) or a DI user (as applicable) with access rights to the DION System to view or download the complete set of DI Forms and related documents received by the SEHK through the DION System. The ESS AP or DI user (as applicable) can log onto the [DION System](https://sdinotice.hkex.com.hk/notification) (<https://sdinotice.hkex.com.hk/notification>) by using its ESS user ID and password. When a DI Form is received through the DION System, The Stock Exchange of Hong Kong Limited (SEHK) will notify the ESS AP or DI user (as applicable) by sending an email notification.

For issuers that are going to be listed on the Exchange, their ESS AP or DI user (as applicable) will be registered online through ESS. Please visit [ESS website](#) or contact ESS hotline at (852) 2840 3460 for more details about the registration. (Updated in May 2022)

7.2 I am the company secretary of a listed issuer. As all DI Forms will be published on HKEXnews website, what is the purpose for the listed issuer to maintain an ESS AP user / DI user account to receive DI email notification and access the DION System to view/download the DI Forms? Are there any differences between the DI Forms published on the website and those viewed/ downloaded by the listed issuer in the DION System?

SFC and HKEX have worked out such arrangement pursuant to the requirements under Part XV of the SFO.

Personal information will be removed from DI Forms when the forms are published on the HKEXnews website. DI Forms that can be viewed / downloaded by the listed issuers will, however, contain all information that can be found in the electronic copies filed through the DION System.

7.3 I am a representative of a listed derivatives issuer. Will my company receive email notifications from the DION System and is it necessary for my company to access the DION System?

In the event that the DION System receives DI Form(s) that is/are filed in relation to the derivative securities issued by your company, the DION System will send an email notification to either to the ESS AP or DI user (as applicable). The ESS AP or DI user (as applicable) can then access to the [DION System](https://sdinotice.hkex.com.hk/notification) (<https://sdinotice.hkex.com.hk/notification>) to view/download the DI Forms and related documents concerning these derivative securities.

7.4 I would like to have the email notification sent by HKEX to a group of persons instead of the designated ESS AP/ DI user only. What can I do to accomplish this?

Email notifications will be sent to the ESS AP's or DI user's (as applicable) email addresses recorded in the ESS. If a listed issuer considers that the email notification should reach more than one person, it may (i) create a group email account and add the group email address to the ESS user account email address field; or (ii) input multiple email accounts in the ESS user account email address field by separating different email addresses with a semicolon (maximum input is 60 characters) (e.g. inputting two email addresses in the format of A@A.com; B@B.com). (Updated in Feb 2020)

7.5 How long will the DI Form(s) be available for viewing in or downloading from the DION

System?

The DI Forms and related documents will be available for viewing and downloading for 90 days from the date of receipt of such form(s) and document(s) by the Exchange.

7.6 I have wrongly input my ESS AP/DI user password when I tried to log onto the DION System and the account is locked, how do I reset the password and unlock the account?

You should ask your company's security officer to unlock your user account through online [ESS](#) function.

If you forgot your password, you can reset your password through "Forgot User Password" function on the [ESS](#) login page. For more details, you may refer to the ESS User Manuals. **(Updated in Feb 2020)**

7.7 Why is the number of email notifications less than the number of DI Forms received through the DION System?

Email notification is sent on a regular time interval (currently set as every five minutes if new filing is received for the concerned listed issuer) regardless of the number of DI Forms. This means that the concerned listed corporation will only receive one email notification for one or more DI Forms received within the prescribed time interval. **(Updated in May 2018)**

7.8 If a listed corporation has transferred its listing from GEM to Main Board, can such listed corporation continue to submit Form 4 to the DION System through the previously created GEM listed corporation user account?

Yes, you may continue to use the GEM listed corporation user account to submit any Form 4 which is related to the then GEM listed corporation. **(Updated in May 2018)**

Section 8: Severe Weather

8.1 Will there be any impact to the operation hours of the DION System and the DI enquiry line during severe weather conditions?

No, both the operation hours of DION System and telephone enquiry line service will be the same as in a normal working day under severe weather conditions. Please refer to [Question 1.3](#) and [Question 9.1](#) for DION System operation hour and telephone enquiry line service hours respectively. **(Updated in Mar 2024)**

8.2 (Removed in Mar 2024)

Section 9: Contact Information

9.1 How do I contact HKEX if there are other issues about the use of the DION System?

DION System user guide which can be found on the [HKEXnews](#) website has provided sufficient information on the DION System functions. In case you have any other DION System operational issues, please contact the DION System enquiry telephone line at (852) 2295 4811 during office hours from 9:00 a.m. to 6:00 p.m. (HK time), or email to DI-Filings@hkex.com.hk. Please also refer to [Question 4.3](#) for other issues. **(Updated in Feb 2020)**