Hi

Thank you for the opportunity to comment.

Please find below our comments in italics:

- **Do you agree that the eight effective practices identified in this report foster market participants' preparedness for above-average VM calls through the efficient collection and distribution of VM in centrally cleared markets?**

  We believe the eight practices may increase the awareness of the VM calls. There are limitations in terms of understanding what the thresholds are when the CCP will call for ITD . VM calls are made at present at EOD for settlement on T+1; netting of VM and IM calls currently do exist, which allows for better liquidity.

- **Are there any other effective practices, mechanisms or changes that would streamline VM processes in centrally cleared markets which have not been covered in this report? If so, please describe such practices.**

  Early Valuations between the CCP and Clearing Member – then to the client. This will provide sight of the possible cover requirement.

- **For each effective practice identified in this report:**

  - **Do you agree that it is an effective practice?**

    It should improve VM calls

  - **Please discuss any drawbacks or hurdles to implementing the effective practice.**

    The main drawback remains in the automation of the payment with the Clearing Member ability to directly automate the collection from clients' accounts irrespective of the bank.

Please contact us if you require anything further.

Kind regards

Sivakalay Pillay
Regulatory Lead
Corporate and Investment Banking

Absa, 1st Floor, North Building, Sandton Campus, 15 Alice Ln, Sandton, 2196, South Africa
cib.absa.africa