## 槓桿交易監理創新的國際經驗介紹

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## 摘 要

本文綜述了美國、新加坡、英國、澳洲,在槓桿交易產品定義上的差異性。本文發現我國的槓桿交易法規設計上主要參考美國經驗,而在實際運營中則採國際通用,以期貨商兼營槓桿交易商的方式。在監理發展上,我國的槓桿交易商環境相對自由,並無嚴格的槓桿倍數限制;而在槓桿交易產品的開發上,由於我國不允許做本幣以及和中國大陸資本市場連結的槓桿交易產品,因而較其他國家保守。這使得我國槓桿交易商在產品開發上,除需結合本國實體經濟需求外,也必須與其他國家既有優勢產品作差異化區別,以滿足國內業者使用槓桿交易產品進行避險以服務實體經濟的需求。

關鍵詞:槓桿交易、金融監理、創新沙盒、監理科技、資訊透明

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## Introduction to the New International Experience of Supervising Leverage Trading

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## **Abstract**

This article summarized the definition differences of leverage trading between U.S., Singapore, U.K. and Australia. We discover that our design of regulations on leverage trade is primarily based on U.S. experience, yet international standard is adopted in the actual operation, futures dealers acting as leverage traders. In terms of the development of supervision, our trading environment for leverage has relative freedom without a strict limit on leverage's multiples. In terms of leverage trade's product development, it is more conservative than other countries since our country forbids creating leverage products that link our currency to Mainland China's capital market. It forces our country to combine the needs of our economy and to create differentiation from other countries' featured products in the leverage trade dealer's product development in order to satisfy the industry need of using leverage trade product to service the market by performing hedge.

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Keywords: Leveraged Transaction, Financial Supervision, Regulatory Sandbox, RegTech, Information Transparency