

**Notice under section 209(3) of the
Securities and Futures Ordinance (Cap.571) (SFO)**

On 20 November 2024, the Securities and Futures Commission (**Commission**) issued a notice to Soochow Securities International Brokerage Limited pursuant to sections 204 and 205 of the SFO (**Notice**).

On 11 March 2025, the Commission received a written notice under section 208(1) of the SFO from Tony Kan & Co acting on behalf of their client Harvest Leader Holdings Limited (**Applicant**), requesting the Commission to withdraw the prohibitions or requirements imposed against the account of the Applicant (account number 98001730) from the list of accounts tabulated at paragraph 1 of the Notice (**Application**).

Upon considering the Application, the Commission decided to refuse it. The reasons for the refusal are set out in the attached Statement of Reasons.

THE COMMISSION GIVES NOTICE THAT:

1. For reasons set out in the attached Statement of Reasons of this date, the Application is refused.
2. Under section 217 of the SFO, a person aggrieved by a specified decision of the Commission made in respect of him may by notice in writing given to the Securities and Futures Appeals Tribunal, apply for a review of the decision.

This Notice takes effect at the time it is served on the Applicant.

Dated this 3rd day of September 2025

For and on behalf of the Commission

Julia Leung
Chief Executive Officer

Statement of Reasons
Under section 209(3) of the Securities and Futures Ordinance
(Cap. 571) (SFO)

The Application of Harvest Leader Holdings Limited (Applicant) for removing its account from the list of accounts in the notice issued to Soochow Securities International Brokerage Limited pursuant to sections 204 and 205 of the SFO

1. On 20 November 2024, pursuant to sections 204 and 205 of the SFO, the Securities and Futures Commission (**Commission**) issued a notice (**Notice**) to Soochow Securities International Brokerage Limited, one of the Specified Corporations (as defined in the statement of reasons dated 20 November 2024), and imposed on it, *inter alia*, the following prohibitions and restrictions:
 - (a) it was prohibited from disposing of or dealing with, or assisting, counselling or procuring another person to dispose of or deal with, any assets in any way in the account of the Applicant (**Account**, with account number 98001730) up to a specified restriction amount of HK\$19,088,320 (**Restriction Amount**); and
 - (b) it was required to notify the Commission immediately upon receipt of any instruction from any authorized person of the Account, and/or by any person acting on his behalf.
2. Copies of the Notice, along with the statement of reasons dated 20 November 2024 (**Previous SOR**) stating the reasons for imposing the Notice were sent to the Applicant pursuant to section 209(4) of the SFO.
3. As explained in the Previous SOR, the Commission received reports from a brokerage firm regarding unauthorised access to various client accounts via the Internet. This resulted in a number of unauthorised stock purchases involving shares of two companies listed on The Stock Exchange of Hong Kong Limited. It is suspected that the client accounts (**Hacked Accounts**) might have been hacked by market manipulators and certain traders (**Traders**) might have collaborated with the suspected hackers in manipulative trading and/or participated in a deceptive scheme. This scheme involved inflating the share prices to an artificially high level, allowing the Traders to later sell these shares at significant profits (**Scheme**). As the Commission had reasons to suspect that market misconduct might have taken place and/or persons might have breached or committed offences under various provisions of the SFO, it considered that it is necessary to prevent the Traders and/or any person(s) connected with the Traders from operating and dealing with the accounts containing the sale proceeds of the suspected manipulative activities. This serves to preserve the status quo pending further investigation.
4. The Restriction Amount represents the proceeds received by the Applicant in the Account from suspected manipulative activities in relation to the shares of Powerwin Tech Group Limited (**Powerwin**).
5. On 11 March 2025, pursuant to section 208 of the SFO, the Applicant's legal representative, Tony Kan & Co, submitted an application for the withdrawal of the

prohibitions or requirements imposed against the Account under the Notice (**Application**).

6. In the Application, the Applicant provided the following explanations in support of its assertion that the proceeds in the Account were gains from ordinary and proper trading activities, rather than proceeds from any manipulative activities:
 - (a) The Applicant was allotted 4,272,000 Powerwin shares at HK\$0.7 through placement on the date of listing and it has been buying and selling Powerwin shares for the period between 31 March 2023 and 6 November 2024. There were no instances of irregular trading of Powerwin shares.
 - (b) Following a significant surge in the share price of Powerwin after the market opened on 6 November 2024, the Applicant proceeded to sell a cumulative total of 4,684,000 Powerwin shares at an average price of HK\$4.07. Shortly thereafter on the same day, the Applicant purchased 1.2 million Powerwin shares.
 - (c) All orders in the shares of Powerwin were placed based on prevailing market conditions with legitimate investment objectives. The Applicant did not participate in any manipulative trading or deceptive scheme.
 - (d) The Applicant had not withdrawn any assets after the disposal. Had it participated in any manipulative trading or deceptive scheme, it would have had ample time to withdraw the assets in its securities account and secure the sale proceeds before the issuance of the Notice.
7. For the reasons further elaborated below, the Commission has decided to refuse the Application. The Commission considers that the imposition of the prohibitions and requirements set out in the Notice remains desirable in the interest of the investing public or in the public interest.
8. The Commission's investigation is ongoing. To date, the Commission has found that on 6 November 2024, the Applicant and other Traders sold a substantial amount of their shares in Powerwin at high prices, with a significant portion of their disposals being taken up by the Hacked Accounts. Findings also suggest that the transactions between the Applicant and the Hacked Accounts might be coordinated. It is suspected that the Applicant might be involved in the Scheme.
9. The Applicant's explanations fail to dispel the Commission's suspicion and are inconsistent with the evidence so far gathered by the Commission. The Commission's response to the Applicant's explanations is as follows:
 - (a) The Applicant's sale of 4,684,000 Powerwin shares in a single day is inconsistent and sharply contrasts with its prior trading pattern. During the period between 31 March 2023 and 6 November 2024 prior to the substantial disposal, the Applicant had continuously traded in and maintained a stable holding of Powerwin shares, and the transacted amounts were not particularly substantial. It is equally suspicious that the Applicant bought 1.2 million Powerwin shares from the market shortly after disposing of its entire holdings. The Applicant has not offered any plausible explanation for its trading activities on 6 November 2024.

(b) The explanation that the shares sold by the Applicant on 6 November 2024 were accumulated over the preceding months is not relevant. The Commission's suspicion is not that the trading activities prior to 6 November 2024 was attributable to the price surge, nor that the purchases were part of the coordinated effort to inflate the share price.

10. Given the Applicant has confirmed that the Account contains proceeds from the sale of stock under investigation on 6 November 2024, it is even more important that the Account be protected from dissipation before the Commission concludes its investigation and rules out the Applicant's involvement in the Scheme
11. In the premises, the Commission believes that it remains necessary to prevent the Applicant and/or any person(s) connected with it from operating and dealing with the Account and to preserve the cash and securities in the Account pending further investigation.
12. As the potential risk of dissipation remains, the Commission considers that it is desirable in the interest of the investing public or in the public interest to impose on the Applicants the prohibitions and requirements as set out in the Notice.

Dated this 3rd day of September 2025

For and on behalf of the Commission

Julia Leung
Chief Executive Officer