

Comments on the Consultation Document on the Proposed Revisions to the Code of Conduct for Persons Registered with the Securities and Futures Commission

1. Schedules 3 and 4 – Additional Requirements for Licensed or Registered Persons Dealing in Securities Listed or Traded on The Stock Exchange of Hong Kong Limited and Additional Requirements for Licensed or Registered Persons Dealing in Futures Contracts and/or Options Contracts Traded on Hong Kong Futures Exchange Ltd.

Paragraphs 15 and 20 of Schedules 3 and 4 respectively list out circulars, specific provisions in the relevant rules and procedures which an exchange participant of SEHK or HKFE should comply with other than the requirements set out in these Schedules applicable to all intermediaries. In view of changes which may take place in relation to the relevant circulars, rules and procedures from time to time, anonymity considers it inappropriate to list out particular circulars and provisions in the Revised Code. Consideration may be given to set out the actual requirements or procedures expected for compliance by an exchange participant of SEHK or HKFE.

2. Schedule 4 – Additional Requirements for Licensed or Registered Persons Dealing in Futures Contracts and/or Options Contracts Traded on Hong Kong Futures Exchange Ltd.

Paragraph 20(c) - anonymity is aware that a Guidance Note on Contract Limits and Reportable Position Rules will be issued by the SFC. This Guidance Note may necessitate amendment to this paragraph.

3. Schedule 5 and 6 – Additional Requirements for Licensed Persons Providing Margin Lending and Additional Requirements for Licensed Persons Engaging in Leveraged Foreign Exchange Trading.

Given one of the objectives of introducing changes to the current Code is to ensure a level playing field, anonymity queries whether there is any exception for these two Schedules for not applying to registered persons.