

28th May 2018

Sent by Email and by Post

Securities and Futures Commission
35/F Cheung Kong Center
2 Queen's Road Central
Hong Kong

Dear Sirs/Madams,

Re: Further Consultation on Offline Requirements Applicable to Complex Products

In general, HKSFA believes that the proposed amendments to the Code of Conduct is reasonable. In order to protect the interest of the general public, complex products should follow a stricter standard of information disclosure as detailed in the proposed amendment to the Code of Conduct.

It is advised that the SFC should regularly update its practical guidelines and FAQs on examples of complex products so as to cater for the fast-changing investment products coming to the market.

We believe that a 12-month transition period could be more flexible to cater for the diversity of financial institutions in Hong Kong.

Yours sincerely,
For and on behalf of
The Hong Kong Society of Financial Analysts

Charles Chui, CFA
Co-chair, Advocacy Committee

Claudius Tsang, CFA
Co-chair, Advocacy Committee