



## **Consultation Paper on Proposed Amendments to the Securities and Futures Ordinance and the Anti-Money Laundering and Counter-Terrorist Financing Ordinance Relating to the Use of Certain Titles**

### **The Law Society's Submissions**

The Securities and Futures Commission (SFC) released a consultation paper on “Proposed Amendments to the Securities and Futures Ordinance and the Anti-Money Laundering and Counter-Terrorist Financing Ordinance Relating to the Use of Certain Titles” (“Consultation Paper”) on 12 June 2025.

In response, the Law Society provides the following submissions. Unless otherwise defined, the same abbreviations and definitions appearing in the Consultation Paper are used in this paper.

*Q1. Do you agree with the proposal to amend section 34 of the SFO as described in paragraphs 12(a), 13 to 16 of the Consultation Paper? If no, please explain why.*

#### **Law Society's response:**

Yes, we agree.

*Q2. Do you agree with the proposal to add a new provision under Part 5B of the AMLO as described in paragraphs 12(b), 13 to 16 of the Consultation Paper. If no, please explain why.*

#### **Law Society's response:**

Yes, we agree.

At paragraphs 13, 15 and 16 of the Consultation Paper, the SFC explains that titles which imply a connection to both “securities” and “non-securities” will be restricted under both section 34 of the SFO and Part 5B of the AMLO, and use of those titles will require authorisations under both SFO and AMLO provisions. We agree with this

approach, and that this approach is consistent with the concurrent licensing and regulation of VATPs under both the SFO and AMLO.

We also note that it would be appropriate to include in AMLO a similar offence provision to section 34(2) of the SFO. The offence under AMLO should be separate and in addition to the existing offence under section 34(2) of the SFO.

*Q3. Do you have any comments or concerns about any of the proposed titles set out in Table A or Table B in paragraph 13 of the Consultation Paper? If yes, please elaborate.*

**Law Society's response:**

We do not have any comments or concerns.

*Q4. Do you have any other comments regarding the proposals discussed in paragraphs 12 to 16 of the Consultation Paper? If yes, please elaborate.*

**Law Society's response:**

We have no other comments.

**The Law Society of Hong Kong  
22 July 2025**