



Hong Kong SFC Suspends Licensed Representative for Undisclosed Personal Trading

On 23 January 2026, the Hong Kong Securities and Futures Commission (**SFC**) [announced the 27-month suspension of the licence of Mr. Wong Chi Fai](#) until 22 April 2028 for failing to disclose his personal trading activities through securities accounts in the name of his niece while employed as a licensed representative at two SFC-licensed brokerage firms. The breaches spanned nearly a decade, from May 2011 to January 2022, and involved 11,300 personal trades amounting in aggregate to over HK\$3.4 billion. Mr. Wong had also made repeated false declarations to both employers denying any beneficial interest in external accounts.

The results of the SFC's action under section 194 of the Hong Kong Securities and Futures Ordinance (the **SFO**) are set out in its [Statement of Disciplinary Action](#).

Employment History of SFC-licensed Representative

Mr. Wong Chi Fai joined Open Securities Limited (**OSL**) (formerly TC Concord Securities Limited and Taiwan Concord Capital Securities (Hong Kong) Limited) as an account executive in December 2005 and facilitated the opening of a securities account at OSL in the name of his niece. Wong was a licensed representative for regulated activity Type 1 (dealing in securities) from December 2005 to December 2018. He was also licensed for Type 2 (dealing in futures contracts) regulated activity from March 2011 to December 2018, when he left OSL.

In June 2019, Wong joined Fulbright Securities Limited and Fulbright Futures Limited (together, **Fulbright**) and was licensed for securities and futures dealing from July 2019 to January 2026. Shortly after joining Fulbright, Wong arranged for his niece to open a securities account at another licensed broker, Glory Sun Securities Limited.

OSL Staff Dealing Policies Compliant with SFC Code of Conduct

At the material time, OSL required employees and account executives, including Wong, to observe the personal trading policies set out in its Compliance Manual. These policies required employees to disclose all accounts in which they had a personal financial interest, a legal right to effect transactions, or which they controlled. These were designated as Employee Associated Accounts. Employees were required to disclose their interests by submitting a prescribed declaration form to their department head and the Legal and Compliance Department (**OSL LCD**).

Employees were also required to confirm the accuracy and completeness of their Employee Associated Account

information through an annual acknowledgement form. OSL retained discretion to deny approval of an Employee Associated Account if confirmations and statements were not provided on time. Employees proposing to conduct dealing in these accounts were required to apply for approval to their department head and OSL LCD. All transactions in Employee Associated Accounts had to be reported to, and actively monitored by, OSL LCD.

During his employment, Wong signed multiple Receipt and Acknowledgement forms confirming he had received, read, understood and agreed to comply with OSL's Compliance Manual and the relevant policies.

Staff Dealing Policies at Fulbright Securities and Fulbright Futures

Fulbright's staff dealing policy and procedures applied to all staff members and account executives, including Wong. Under these policies, staff members and account executives were required to identify all accounts in which they had beneficial interests, designated as Related Accounts, and report them to Fulbright's senior management. Approval from a responsible officer or senior management was required to open a securities account with another intermediaries. Where this approval was granted, the staff member was required to arrange for copies of all trade confirmations and account statements to be provided to the Compliance Department. Fulbright retained full discretion to prohibit or limit staff dealing activities. All dealings in Related Accounts were subject to regular review by a responsible officer.

Wong acknowledged receipt of and agreed to comply with the Fulbright Policies on 13 June 2019.

SFC Findings of Breaches of Open Securities Limited's Staff Dealing Policies

The SFC's investigation revealed that Wong breached OSL's policies between May 2011 and December 2018. Between 1 January 2015 and 31 December 2018, Wong conducted approximately 10,000 transactions with an aggregate value of HK\$2.8 billion in the OSL account. He did so without seeking approval from, or providing duplicate trade confirmations and account statements to, his department head and OSL LCD. OSL was unable to provide monthly statements for the period before January 2015 due to the expiration of the retention period. The SFC was therefore unable to ascertain whether Wong conducted personal dealings in the OSL Account before 1 January 2015.

Despite his financial interests in and control over the OSL Account, Wong did not disclose these to OSL or obtain the required approval. On five separate occasions between May 2011 and December 2018, he falsely declared to OSL that there were no trading accounts held by other persons in which he had a beneficial interest or influence.

SFC Findings of Breaches of Fulbright's Policies

Wong arranged for his niece to open the GS Account on 29 October 2019 for his personal use. He did not obtain approval from Fulbright's responsible officer or senior management. He also did not arrange for copies of trade confirmations and account statements to be delivered to Fulbright's Compliance Department.

Between 1 November 2019 and 31 January 2022, Wong conducted approximately 1,300 transactions with an aggregate value of HK\$670 million in the GS Account. Fulbright had no knowledge of these activities. Despite his beneficial interest in the account, Wong failed to disclose this to Fulbright. He submitted three written annual declarations to Fulbright between September 2019 and June 2021 falsely confirming that he held no Related Accounts outside the firm.

Mr. Wong admitted to the SFC that he knew that, as a licensed representative, he was obliged to report his trading activities to his principal. He acknowledged that he should not have used another person's account to conduct personal dealings and admitted that he conducted personal dealings in the GS Account to avoid having to disclose his dealings to Fulbright.

SFC's Assessment of Fitness and Propriety

The SFC alleged that Mr. Wong's failures to comply with OSL and Fulbright policies circumvented both firms' internal controls as his conduct evaded their monitoring of his personal trading activities. The SFC noted that his repeated false declarations, coupled with his own admissions, indicated that his failures were wilful and dishonest.

The OSL and Fulbright policies reflected the regulatory requirements under paragraph 12.2 of the SFC's Code of Conduct for Persons Licensed by or Registered with the SFC. This provision requires licensed corporations to implement procedures and policies on employee trading and mandates active monitoring of trading activities in employees' accounts and their related accounts, including accounts in which employees hold beneficial interests.

The SFC concluded that Wong was not a fit and proper person to remain licensed. His conduct cast serious doubts on his character, reliability and ability to carry on regulated activities competently, honestly and fairly.

Factors the Hong Kong SFC Considered in Determining Suspension length

The SFC took into account all relevant circumstances including Wong's breaches which spanned almost 10 years. He conducted approximately 11,300 personal trades with an aggregate value exceeding HK\$3.4 billion. These trades were primarily attributable to frequent day trading and short-term margin trading activities.

The SFC acknowledged that there is no evidence his trading activities in the OSL Account and GS Account prejudiced the interests of OSL and Fulbright's clients or market integrity. The SFC also noted that a deterrent message needs to be sent to the market that deliberate circumvention of internal control policies by licensed individuals will not be tolerated. Wong cooperated with the SFC in resolving its concerns and had an otherwise clean disciplinary record.

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