STATEMENT OF DISCIPLINARY ACTION

The Disciplinary Action

1. The Securities and Futures Commission (**SFC**) has suspended the licence of Ms Choi Sau Wai (**Choi**), a former account executive (**AE**) of Glory Sun Securities Limited (**GSSL**)[1], for 7 months from 23 January 2026 to 22 August 2026 pursuant to section 194 of the Securities and Futures Ordinance (**SFO**).

2. The SFC's investigation found that between October 2019 and January 2022, Choi breached the internal written policies of GSSL by allowing a third party (**TP**), who is an account executive of another brokerage firm[2], to operate and carry out personal trades in the securities account of a client (**Client**) at GSSL (**Client Account**), without obtaining the Client's written authorization and written consent from TP's employer.

Summary of facts

3. During the SFC's investigation into a suspected ramp-and-dump scheme, the SFC looked into certain securities transactions that were conducted in the Client Account.

4. TP is the Client's uncle. After acquainting Choi, TP made arrangements for the Client to open the Client Account at GSSL for TP to conduct personal trading. Following TP's instructions and introduction, the Client opened the Client Account on 29 October 2019.

5. Choi liaised with TP in handling the account opening process for the Client and became the AE for the Client Account. Choi knew, or ought to have known, that the mobile phone number and email address stated in the account opening documents belonged to TP.

6. At the material time, the Operations Manual of GSSL provided that:

   (a) if a client intended to authorize a third party to operate and place orders in his/her account, he/she was required to sign a "Third Party Trade Authorization Form" (**Authorization Form**), specifying his/her relationship

[1] Choi is licensed under the SFO to carry on Type 1 (dealing in securities) and Type 2 (dealing in futures contracts) regulated activities. She was formerly accredited to GSSL (formerly known as China Goldjoy Securities Limited) as a licensed representative for Type 1 regulated activity from 14 January 2019 to 6 June 2023 and Type 2 regulated activity from 14 January 2019 to 27 September 2022. Since 19 September 2023, Choi has been accredited to SinoPac Securities (Asia) Limited as a licensed representative for Type 1 and Type 2 regulated activities.

[2] The SFC has suspended the TP, Mr Wong Chi Fai, for 27 months. Please refer to the SFC's press release dated 26 January 2026.

with the authorized person, the reason for the authorization, and whether the authorized person was a person licensed by the SFC;

(b) if the authorized person was a SFC licensee, the client must submit a consent letter from the licensed person's employer;

(c) the Authorization Form must be approved by two responsible officers of GSSL; and

(d) verbal authorization would not be accepted.

7. Between 2019 and 2022, GSSL sent a number of emails to its staff members (including Choi), reminding them to comply with the Operations Manual and the Code of Conduct for Persons Licensed by or Registered with the SFC (**Code of Conduct**).

8. According to GSSL's records, the Client did not sign any Authorization Form authorizing TP to trade in the Client Account. During her interview with the SFC, Choi confirmed that there was no such authorization associated with the Client Account.

9. Nonetheless, the SFC's investigation revealed that TP conducted approximately 1,300 transactions with an aggregate value of HK$670 million in the Client Account during the period from 1 November 2019 to 31 January 2022. TP admitted to the SFC that he conducted his personal trading in the Client Account in order to avoid disclosure to his then employer.

10. The evidence shows that, after the Client Account was opened, Choi communicated directly with TP via WhatsApp messages to assist TP in setting up the account and trading line. Choi also answered a number of queries from TP in relation to the operation of the Client Account. The WhatsApp messages showed that Choi was aware that TP controlled the Client Account and had arranged for multiple deposits of funds into it.

11. Although Choi knew that TP was an AE of another licensed corporation, she allowed and facilitated TP to trade in the Client Account, without obtaining written authorization from the Client and a consent letter from TP's employer. In doing so, Choi not only breached the internal policies of GSSL, but also hindered GSSL's ability to comply with:

(a) paragraph 7.1(a)(i) of the Code of Conduct, which provides that a licensed person should not effect a transaction for a client unless before the transaction is effected, the client, or a person designated in writing by the client, has specifically authorized the transaction; and

(b) paragraph 12.2(c) of the Code of Conduct, which provides that a licensed person should not knowingly deal in securities for another licensed corporation's employee unless it has received written consent from that licensed corporation.

12. Furthermore, as GSSL had no knowledge of TP's involvement with the Client Account, Choi's failures prevented GSSL from discharging its obligations under paragraph 5.4 of the Code of Conduct, which requires a licensed person to be satisfied on reasonable grounds about the identity, address and contact details of the person or entity ultimately responsible for originating the instruction in relation to a transaction and the person or entity that stands to gain the commercial or economic benefit of the transaction and/or bear its commercial or economic risk.

13. Choi's conduct also exposed the Client to the risk of losses arising from TP's personal trades, and GSSL to potential liability in case the Client disputes the trades in the Client Account. The SFC is concerned that Choi has failed to act with due skill, care and diligence and in the best interests of her client, in breach of General Principle 2 of the Code of Conduct, which requires a licensed person to act with due skill, care and diligence, in the best interests of its clients and the integrity of the market in conducting its business activities.

Conclusion

14. Having considered all the circumstances, the SFC is of the view that Choi is guilty of misconduct and not a fit and proper person to remain licensed.

15. In reaching the decision to take the disciplinary action set out in paragraph 1 above, the SFC has taken into account all relevant circumstances, including:

    (a) Choi's breaches of GSSL's internal policies facilitated TP's large number of personal trades in the Client Account over a period of more than 2 years, thereby enabling TP to circumvent his principal's internal controls and evade its monitoring of his personal trading activities;

    (b) Choi cooperated with the SFC in resolving the SFC's concerns; and

    (c) Choi has an otherwise clean disciplinary record with the SFC.