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## **DISCLOSURE OF CLIENT IDENTITY**

At a recent educational forum, a Participant requested that Compliance & Surveillance staff clarify whether divulging the identity of a client, when in possession of that client's order, would constitute a contravention of Trading Rule TR.18 (Disclosure of information).

Compliance & Surveillance staff referred this matter to both the Exchange's Legal department for its legal opinion, and to the Market Practices Committee (MPC) as a policy issue. The Committee considered the policy issue at its August 2002 meeting and determined, that the identity of a client is captured by Trading Rule TR.18 and therefore, should not be disclosed. However, the MPC was of the view that revealing the general 'category' or general location of the client was acceptable. For instance, "an offshore fund manager".

Further, the Rule is limited in its application to orders that are being held, so the rule would not apply to what is revealed after completion of an order.

Should you have any queries regarding this matter, please contact Bronwyn Hill, Manager, Compliance & Surveillance on (02) 9256-0699 or at: [bhill@sfe.com.au](mailto:bhill@sfe.com.au).

A handwritten signature in black ink, appearing to be 'Bronwyn Hill', written over a horizontal line.

**BRONWYN HILL**  
**MANAGER, COMPLIANCE & SURVEILLANCE**

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