

Swedish Securities Dealers Association

Finnish Association of Securities Dealers

**Response to December consultation paper on Code of Conduct for
Interest Representatives**

15th February 2008

The Swedish Securities Dealers Association, SSSA, represents banks and firms providing investment services in Sweden.

The Finnish Association of Securities Dealers, FASD, is the co-operation and self-regulatory organisation of the Finnish investment services industry.

SSSA and FASD have a formal cooperation arrangement, on EU policy matters, with the London Investment Banking Association, LIBA. SSSA and FASD are therefore aware of the contents of LIBA's response to the Commission's consultation on the Code of Conduct for Interest Representatives. SSSA and FASD agree with what LIBA states in sections 3 to 6 in the response. In addition to LIBA'S section 5, Financial disclosure, SSSA and FASD want to stress that trade associations should be able as an alternative to disclosing estimated direct cost of lobbying, to provide information about the sources of funding of the association.