

Assets & Residence Policy Team
HM Revenue and Customs
Room 3C/03
100 Parliament Street
London SW1A 2BQ

(Submitted by e-mail to asres.consult@hmrc.gov.uk)

21 February 2020

Dear Sir or Madam,

ICMA support for ICMSA response to HMRC and HM Treasury's Technical Consultation Document on Fifth Money Laundering Directive and Trust Registration Service¹

ICMA is a not-for-profit membership association, headquartered in Switzerland, that serves the needs of its wide range of member firms in global capital markets. As at October 2019 it has more than 580 members in 62 countries. Among its members are private and public sector issuers, banks and securities houses, asset managers and other investors, capital market infrastructure providers, central banks, law firms and others. See: www.icmagroup.org.

The ICMA Legal and Documentation Committee² gathers the heads and senior members of the legal transaction management teams of ICMA member banks active in lead-managing syndicated bond issues in Europe.

The ICMA Legal & Documentation Committee has seen ICMSA's response to HMRC and HMT's Technical Consultation Document on Fifth Money Laundering Directive and Trust Registration Service dated 14 February 2020³. The ICMA Legal & Documentation Committee supports the suggestions made by ICMSA in its response.

Yours faithfully,



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¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/860269/Technical_consultation_document_Fifth_Money_Laundering_Directive_and_Trust_Registration_Service.pdf

² <https://www.icmagroup.org/Regulatory-Policy-and-Market-Practice/Primary-Markets/primary-market-committees/icma-legal-and-documentation-committee/>

³ ICMA understands that the ICMSA's response will be made available on the ICMSA website in due course: <https://icmsa.org>