

Cross-border transactions of intermediated securities: a comparative analysis in substantive law and private international law

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Abstrak

This work aims to analyse substantive and conflict of laws rules regarding intermediated securities in a comparative way. For this purpose, it examines major jurisdictions' rules for intermediated securities and the intermediated securities holding systems, such as the rules of the German, US, Korean, Japanese and Swiss systems, as well as the relevant EU regimes and initiatives. Above all, it analyses the two international instruments related to intermediated securities, i.e. the Geneva Securities Convention and the Hague Securities Convention. Through a functional comparative approach based upon legal traditions of the various jurisdictions, this book gives readers theoretical and practical information on intermediated securities and their national and international aspects.