

SUCCESS UNIVERSE GROUP LIMITED  
實德環球有限公司

(Incorporated in Bermuda with limited liability)



SUCCESS

12<sup>th</sup> September 2016

**BY HAND**

Corporate Communications Department  
c/o Hong Kong Exchanges and Clearing Limited  
12/F., One International Finance Centre  
1 Harbour View Street  
Central, Hong Kong

Dear Sirs,

Re: Consultation paper on Proposed Enhancements to the Exchange's Decision-Making and Governance Structures for Listing Regulation

We refer to the Joint Consultation Paper on the Proposed Enhancements to the Stock Exchange of Hong Kong Limited's decision-making and Governance Structure for Listing Regulation issued in June 2016 (the "Proposed Enhancements").

Our comments on the Proposal Enhancements are as follows:-

1. The new structure will give SFC a complete control over the regulatory and listing matters. Under the Proposed Enhancements, there will be establishments of two new committees, Listing Policy Committee ("LPC") and Listing Regulatory Committee ("LRC"), and the members thereof are dominated by SFC. LPC and LRC are above the Listing Committee ("LC") and can make final decision. Although LC can also give their view and suggestions on the regulatory and listing matters but their comments are non-binding.
2. The new structure will limit the role of LC in regulatory and listing matters which will be detrimental to the overall market development. Members of LC have diverse expertise and experience and these inputs are conducive to the overall market development. Moreover, SFC is regulator-minded and tends to be risk-averse, it may probably raise the threshold to listing. At the end, less listings will be attracted to Hong Kong which ultimately affects the market development in Hong Kong.
3. As stated above, the Proposed Enhancements will give SFC a dominant control over the regulatory and listing matters without proper checks and balance and this will destroy the existing three-tier (Government, SFC and Listing Committee) regulatory structure.

In view of the above, we **oppose** the Proposed Enhancements.

Yours faithfully,

For and on behalf of  
Success Universe Group Limited

Authorized Signatory