

Date : 25 September 2019

By Email to: response@hkex.com.hk  
Corporate Communications Department  
Hong Kong Exchanges and Clearing Limited  
8th Floor, Two Exchange Square,  
8 Connaught Place, Central Hong Kong

Dear Sirs,

Re: Strong objection to proposed Note 3 to Rule 3.28 and the general grant of waivers from strict compliance with Rule 3.28

I am a Company Secretary, having been Chartered by the ICS as early as 1995.

I perceive that the ultimate motion of the proposal is to violate and finally to lose the indispensable qualities of skills, integrity, professionalism and competence of company secretaries, and to sentence the following valuable properties of chartered secretaries to death :-

Properness, Accuracy, Efficiency, Effectiveness and, the most importance of all chartered practitioners' Independence and Insistence in the compliance of the Codes as well as the Rules, Regulations and Procedures of HKEX.

It will also lead to a complete surrender and total sacrifice of the equivalent long built social and professional values of all other professionals and commercial communities of Hong Kong.

Therefore, I strongly object to the codification of the general principles for waiver from strict compliance with Rule 3.28 of the Listing Rules set out under paragraphs 66-71 of the Consultation Paper and the general grant of waivers from strict compliance with Rule 3.28 going forward.

Your kind attention, as well as concrete and effective response to this objection will highly be appreciated.

Yours faithfully,

  
CHOW Man Yee Bony  
Chartered Secretary  
(FCIS, FCS) Membership # : 4016281  
Email: 