

From: [REDACTED]
Sent: Tuesday, August 27, 2019 9:35 AM
To: response <response@hkex.com.hk>
Subject: Consultation Paper on Codification of General Waivers and Principles Relating to IPOs and Listed Issuers and Minor Rule Amendments (Consultation Paper)

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This is a personal view. I do not represent the Institute in the views herein.

I am a qualified Solicitor, and Chartered Secretary and Chartered Governance Professional.

The proposed introduction of Note 3 to Rule 3.28 Listing Rules is in my view not the codification of a general waiver. There are only few cases where this was done - including a recent case in which the Institute wrote to object upon learning of the same - given the fundamental objectionable nature of an unqualified person being able to do a regulated job in my humble view.

In any event to elevate these few and far between waivers - which are frankly devoid of basis to grant in the first place - to a general waiver is not to a logical jump but rather a leap. When the impact of this - which again is that unqualified persons can become Chartered Secretaries is factored in, the proposal is wholly unacceptable – especially when there is no prior consultation.

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