



21 April 2008

Corporate Communications Department Hong Kong Exchanges and Clearing Limited 12th Floor, One International Finance Centre 1 Harbour View Street, Central Hong Kong

Dear Sirs

Re: Combined Consultation Paper on Proposed Changes to the Listing Rules (January 2008) ("Consultation Paper")

- Issue 1: Use of website for communication with shareholders

We, being a professional service provider for provision of corporate secretarial and share registration services to listed issuers, would like to raise our comment on the following practical aspect of the above issue as discussed in the Consultation Paper.

Existing Main Board Rule 13.56 and GEM rule 17.60 require issuers to send copies of corporate communications to any non registered holders i.e. person or company whose listed securities are held in CCASS and who has notified the issuer from time to time, through HKSCC, that such person or company wishes to receive corporate communications.

For many listed issuers, the number of non registered holders is much larger than that of the holders on their Registers of Members. The cost savings and environmental protection purposes by greater use of electronic communication may only be achieved after the current practices of sending printed copies of corporate communications to non registered holders are removed or altered. The Exchange may consider to modify the proposed new Listing Rules and to procure to amend the relevant rules of HKSCC/CCASS so that the proposed new deeming rules would also be applicable to the non registered holders.

Thank you for your attention.

Yours faithfully For and on behalf of TRICOR SERVICES LIMITED

Natalia Seng Executive Director

Business, Corporate and Investor Services 商務、企業、投資者服務

Member of BEA Group 東亞銀行集團成員