



25 June 2013

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Corporate and Investor Communications  
Hong Kong Exchanges and Clearing Limited  
12<sup>th</sup> Floor, One International Finance Centre  
1 Harbour View Street  
Central  
Hong Kong

Dear Sirs,

**Re: Consultation Paper on Review of Connected Transaction Rules**

SHINEWING Risk Services Limited ("SHINEWING") is pleased to respond to your consultation paper on review of connected transaction Rules and our comments on it are set out in this letter.

SHINEWING is a leading proponent of good governance both for our clients and the firm. Drawing on the wide range of our services, such as compliance procedures review, risk management, internal control review and corporate governance review services, and practical experiences, SHINEWING has maintained its leadership in the markets of China and Hong Kong over the years.

**Comments on the Review**

SHINEWING agrees to simplify the language of the connected transaction Rules by replacing the current Chapter 14A of the Listing Rules with the "Guide on Connected Transaction Rules" issued in April 2012. During our training provided to the directors of certain issuers, some of the directors reflected that the current Chapter 14A is hard to understand. By using diagrams to present the relationships and definitions, directors can master the idea with ease.

Moreover, SHINEWING generally agrees on the amendments proposed in the consultation paper. We believe that such initiatives can promote higher disclosure and ethical standard and improve the corporate governance image of Hong Kong issuers.

We trust that these comments are useful and we would be pleased to discuss any of the points above with you in more detail. Please do not hesitate to contact [REDACTED]. We wish you every success with the rest of the consultation process, and for the avoidance of any doubt this is not a confidential reply.

Yours faithfully,

SHINEWING Risk Services Limited

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