

Signature (with Company Chop if the response represents company view)

Part B Consultation Questions

Please indicate your preference by checking the appropriate boxes. Please reply to the questions below on the proposed change discussed in the Consultation Paper downloadable from the HKEx website at: <http://www.hkex.com.hk/eng/newsconsul/mktconsul/Documents/cp201209q.doc>.

Where there is insufficient space provided for your comments, please attach additional pages.

1. Do you agree that the Exchange should promote board diversity?

Yes

No

Please give reasons for your views.

Hong Kong, being an international financial centre, should take a more active role in implementing diversity in the board. We agree to the consultation papers in that diversity improves board performance in various aspects. We have 3 female directors out of 8 board members. In addition, our board comprises members from different professions, education background and disciplines.

2. If your answer to Q.1 is “yes”, do you agree that our Corporate Governance Code and Corporate Governance Report is the appropriate place for the new measures on board diversity?

Yes

No

Please give reasons for your views.

To include the new measures in Code Provisions is better than mere recommendations in recommended best practices to give more force in pushing listed issuers to comply.

3. Do you agree with our proposal to introduce CP A.5.6 (*the nomination committee or the board should have a policy concerning diversity of board members, and should disclose the policy or a summary of the policy in the corporate governance report*)? Please give reasons for your views.

Yes

No

Please give reasons for your views.

Nomination committee is the appropriate forum to consider and implement this policy. We prefer more transparency in making prompt disclosure to shareholders and other investors.

4. Do you agree (i) with our proposal to introduce a note under CP A.5.6 to clarify what we mean by diversity; and (ii) with the content of the note? Please give reasons for your views.

(i)

Yes

No

(ii)

Yes

No

Please give reasons for your views.

There should be a guideline as to what diversity means. However, consistent with the "One size does not fit all" approach in the Corporate Governance Code, we should not mandatorily define what particular aspects of diversity that all listed issuers should achieve. Rather, we should permit greater flexibility and leave it to individual listed issuers themselves to decide what aspects of diversity suit them most based on their particular circumstances.

5. Do you agree with our proposal to introduce a new mandatory disclosure provision in the Code stating that if the issuer has a policy concerning diversity, it should disclose details of the board's policy or a summary of the policy on board diversity, including any measurable objectives that it has set for implementing the policy, and progress on achieving the objectives? Please give reasons for your views.

Yes

No

Please give reasons for your views.

Please refer to our answer to question no 3 above.

6. Which of the following would you prefer as the implementation date of the amendments set out in this paper?

- 1 January 2013
- 1 April 2013
- 1 June 2013
- 1 September 2013
- Other, please specify and give reasons.

Listed issuers should be allowed enough time to discuss and prepare for the change, such as amending the terms of reference of their Nomination Committee, formulating policies with reference to their individual circumstances, and devising and taking substantive actions to implement such policies. As such, we believe 1 September 2013 is the appropriate implementation date.

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