

Question 1

Do you agree with our proposal to introduce a code provision ("CP") requiring an issuer's board to set culture in alignment with issuer's purpose, value and strategy?

是

Please give reasons for your views.

文化有助于公司战略实现落到精神层面。

Question 2a

Do you agree with our proposal to introduce a CP requiring establishment of an anti-corruption policy?

是

Please give reasons for your views.

有助于公司经营合规。

Question 2b

Do you agree with our proposal to upgrade a Recommended Best Practice ("RBP") to CP requiring establishment of a whistleblowing policy?

是

Please give reasons for your views.

大多公司已设置，更应当注意安全性。

Question 3

Do you agree with our proposal to introduce a CP requiring disclosure of a policy to ensure independent views and input are available to the board, and an annual review of the implementation and effectiveness of such policy?

否

Please give reasons for your views.

专家意见容易增加企业负担。

同意其他确保独立性修改。

Question 4a

Do you agree with our proposal regarding re-election of an independent non-executive director serving more than nine years ("Long Serving INEDs") to revise an existing CP to require (i) independent shareholders' approval; and (ii) additional disclosure on the factors considered, the process and the board or nomination committee's discussion in arriving at the determination in the explanation on why such Long Serving INED is still independent and should be re-elected?

是

Please give reasons for your views.

有助于公司董事会增加新的意见。

Question 4b

Do you agree with our proposal to introduce a CP requiring an issuer to appoint a new independent non-executive director ("INED") at the forthcoming annual general meeting where all the INEDs on the board are Long Serving INEDs, and disclosing the length of tenure of the Long Serving INEDs on the board on a named basis in the shareholders' circular?

是

Please give reasons for your views.

同意有助于强制实现独董任期规定。

Question 5

Do you agree with our proposal to introduce a new RBP that an issuer generally should not grant equity-based remuneration (e.g. share options or grants) with performance-related elements to INEDs as this may lead to bias in their decision-making and compromise their objectivity and independence?

是

Please give reasons for your views.

独立性应当具备的。

Question 6a

Do you agree with our proposal to highlight that diversity is not considered to be achieved by a single gender board in the note of the Rule?

是

Please give reasons for your views.

有助于董事会观点多样，促进性别平等

Question 6b

Do you agree with our proposal to introduce a Mandatory Disclosure Requirement ("MDR") requiring all listed issuers to set and disclose numerical targets and timelines for achieving gender diversity at both: (a) board level; and (b) across the workforce (including senior management)?

是

Please give reasons for your views.

有助于性别平等

Question 6c

Do you agree with our proposal to introduce a CP requiring the board to review the implementation and effectiveness of its board diversity policy annually?

是

Please give reasons for your views.

有助于实施。

Question 6d

Do you agree with our proposal to amend the relevant forms to include directors' gender information?

是

Please give reasons for your views.

有助于多元化

Question 7

Do you agree with our proposal to upgrade a CP to Rule requiring issuers to establish a nomination committee chaired by an INED and comprising a majority of INEDs?

否

Please give reasons for your views.

同意独立性，但外部董事往往不了解公司内部管理层情况，最后还是听取内部董事意见。

Question 8

Do you agree with our proposal to upgrade a CP to a MDR to require disclosure of the issuer's shareholders communication policy (which includes channels for shareholders to communicate their views on various matters affecting issuers, as well as steps taken to solicit and understand the views of shareholders and stakeholders) and annual review of such policy to ensure its effectiveness?

是

Please give reasons for your views.

有助于股东沟通

Question 9

Do you agree with our proposal to introduce a Rule requiring disclosure of directors' attendance in the poll results announcements?

是

Please give reasons for your views.

有助于董事出席保障。

Question 10

Do you agree with our proposal to delete the CP that requires issuers to appoint non-executive directors for a specific term?

否

Please give reasons for your views.

没有本质区别。都可以重选连任

Question 11

Do you agree with our proposal to elaborate the linkage in the Code by (a) setting out the relationship between corporate governance and environmental, social and governance ("ESG") in the introductory section; and (b) including ESG risks in the context of risk management under the Code?

是

Please give reasons for your views.

有助于理解不同概念关系

Question 12

Do you agree with our proposal to amend the Rules and the ESG Guide to require publication of ESG reports at the same time as publication of annual reports?

否

Please give reasons for your views.

时间较紧，印刷商及公司修改压力大，涉及有关财务数据修订更新。建议可以调整为年报后 7-15 日内。

Question 13

Do you have any comments on how the re-arranged Code is drafted in the form set out in Appendices III and IV to the Consultation Paper and whether it will give rise to any ambiguities or unintended consequences?

否

Please give reasons for your views.

无，合并有关表述更有助于理解。

Question 14

In addition to the topics mentioned in the Consultation Paper, do you have any comments regarding what to be included in the new guidance letter on corporate governance (i.e. CG GL) which may be helpful to issuers for achieving the Principles set out in the Code?

是

Please give reasons for your views.

- 1.具体披露指标和要求。
- 2.建议公司做法，具体要求。

Question 15a

Do you agree with our proposed implementation dates for all proposals (except the proposals on Long Serving INED): the financial year commencing on or after 1 January 2022?

是

Please give reasons for your views.

同意有过渡时间。

Question 15b

Do you agree with our proposed implementation dates for proposals on Long Serving INED: the financial year commencing on or after 1 January 2023?

是

Please give reasons for your views.

同意