



Kelly Lee
Hong Kong Exchanges and Clearing Limited
By email: [REDACTED]

1 July 2021

Dear Ms Lee

Re: Consultation Paper on the Review of the CG Code

As an institutional investor member of the Asian Corporate Governance Association (ACGA), Universities Superannuation Scheme Ltd (USS) welcomes the opportunity to endorse ACGA's response to the HKEX consultation paper on the "Review of Corporate Governance Code and Related Listing Rules".

Background to USS

The Universities Superannuation Scheme was established in 1974 as the principal pension scheme for universities and other higher education institutions in the UK. It has more than 400,000 members across more than 350 institutions and is one of the largest pension schemes in the UK, with total fund assets of approximately £80 billion.

USS Investment Management Ltd (a wholly owned subsidiary of Universities Superannuation Scheme Ltd) is the principal investment manager and advisor to the scheme. USS's investment team directly manages the majority of the scheme's assets which allows our investment approach to be tailored to the scheme's requirements and provides us with a unique perspective compared to many other institutional investors. As an institutional investor that takes seriously its fiduciary obligations, USS aims to be an active, engaged and responsible owner of the companies and assets in which it invests.

Background to ACGA

The ACGA is a non-profit membership association founded in Hong Kong in 1999. ACGA conducts independent research on corporate governance and ESG, and advocates at the regulatory and corporate level across Asia-Pacific to improve standards and practices. ACGA is entirely funded by a network of 112 member firms, of which 70% are institutional investors with more than US\$40 trillion in assets under management globally.

USS believes ACGA's consultation response addresses areas in the revised Code that take corporate governance in Hong Kong forward in a constructive way. The response also highlights reforms that USS would like to see included in the revised Code and where Hong Kong needs to rise to the challenge to ensure its corporate standards are comparable to other markets in the region.

Universities Superannuation Scheme Ltd

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Overall, we agree with ACGA that the proposals in the consultation paper are often lacking in ambition and that bolder steps are necessary to bring the governance of Hong Kong-listed companies up to international standards. This would help to reinforce Hong Kong's position as the international finance centre in China.

We hope that our endorsement of ACGA's consultation response will assist with your deliberations and please let me know if we can provide any further information.

Yours sincerely



Dr Daniel Summerfield
Head of Corporate Affairs

Tel: 