

Submitted via Qualtrics

Anonymous
Personal
Accountant

Question 1

Do you agree to upgrade climate-related disclosures to mandatory from "comply or explain"?

Yes

Please provide reasons for your views.

Agree. The upgraded disclosure could ensure greater transparency and accountability in terms of issuers' climate-related risks and opportunities

Question 2

Do you agree to introduce new governance disclosures focusing on climate-related issues as set out in paragraph 1 of Part D of the Proposed Appendix 27?

Yes

Please provide reasons for your views.

Agree. The current disclosures already have similar practices (i.e. ESG committee or working group). The new disclosures are more detail and specify in terms of climate-related concerns.

Question 3

Do you agree to require disclosure of climate-related risks as set out in paragraph 2 of Part D of the Proposed Appendix 27?

Yes

Please provide reasons for your views.

Agree. The new disclosures could further consummate the current requirement (i.e. A4-Climate Change)

Question 4

Do you agree that issuers may opt to disclose the actual and potential effects of climate-related opportunities they may have identified in response to climate-related risks disclosed as set out in paragraph 3 of Part D of the Proposed Appendix 27?

Yes

Please provide reasons for your views.

Agree. There could be an interim period for those issuers who have not yet identified their climate-related risks and opportunities

Question 5

Do you agree that an issuer shall consider the applicability of and disclose the metrics when assessing and making disclosure of climate-related risks and opportunities as set out in paragraph 4 of Part D of the Proposed Appendix 27?

Yes

Please provide reasons for your views.

Agree. It could increase the credibility of the information the issuer disclosed. Also, investors and other stakeholders could be better informed, so as to help them to make investment decisions.

Question 6

Do you agree to require disclosure of how the issuer is responding to climate-related risks and, where an issuer chooses to, any climate-related opportunities as set out in paragraph 5 of Part D of the Proposed Appendix 27?

Yes

Please provide reasons for your views.

Agree. Issuers should demonstrate their commitment to mitigating these risks and their ability to adapt to changing environmental and social conditions. It also provides a better insight for investors and other stakeholders into how the company is going to manage these risks and opportunities.

Question 7

Do you agree to require disclosure of climate-related targets set by the issuer as set out in paragraph 6 of Part D of the Proposed Appendix 27?

Yes

Please provide reasons for your views.

Agree. It provides a clearer guidance and requirement that how could an issuer set targets and what to include in those targets

Question 8

Do you agree that where an issuer has yet to disclose climate-related targets, it should make alternative disclosures as set out in note 2 to paragraph 6 of Part D of the Proposed Appendix 27?

Yes

Please provide reasons for your views.

Agree. The issuer should show their commitment and intention to set up climate-related targets.

Question 9

Do you agree to require disclosure of progress made in the most recent reporting year in respect of plans disclosed as set out in paragraph 7 of Part D of the Proposed Appendix 27?

Yes

Please provide reasons for your views.

Agree. So that investors and other stakeholders could monitor how well the company is implementing its transition plan.

Question 10

Do you agree to require discussion of the issuer's climate resilience as set out in paragraph 8 of Part D of the Proposed Appendix 27?

Yes

Please provide reasons for your views.

Agree. It provides investors with insight into how the company is managing climate-related risks and opportunities, which help to make investment decisions and mitigate risks. It is suggested that the risks assessment process should be revealed as well

Question 11

Do you agree to require issuers to apply a climate-related scenario analysis that is commensurate with the issuer's circumstances, and to require disclosure of information on climate-related scenario analysis as set out in paragraph 9 of Part D of the Proposed Appendix 27?

Yes

Please provide reasons for your views.

Agree. It helps issuers to identify potential climate-related risks and opportunities, develop strategies to manage these risks, and capitalize on emerging opportunities.

Question 12

Do you agree to require disclosure of the current financial effects of climate-related risks, and where applicable, climate-related opportunities as set out in paragraph 10 of Part D of the Proposed Appendix 27?

Yes

Please provide reasons for your views.

Partial agree. Not only do the issuer need to identify the climate-related risks on its financial performance, but the investors and other stakeholders also need to be informed, as it would influence their investment decisions. It is suggested that the HKEx could guide how to disclose relevant information

Question 13

Do you agree that during the Interim Period, where an issuer has yet to provide quantitative disclosures pursuant to paragraph 10(a) of Part D of the Proposed Appendix 27, it should make the interim disclosures as set out in the paragraph immediately following paragraph 10 of Part D of the Proposed Appendix 27?

Yes

Please provide reasons for your views.

Agree. The issuer should show their commitment and intention to provide relevant information.

Question 14

Do you agree to require disclosure of anticipated financial effects of climate-related risks and, where applicable, climate-related opportunities as set out in paragraph 11 of Part D of the Proposed Appendix 27?

Yes

Please provide reasons for your views.

Partial agree. The issuer should identify the potential climate-related risks on its financial performance, so as to establish business plans and strategies. Investors and other stakeholders also need to be informed, as it would influence their investment decisions. However, we wonder how is the information disclosed? Are they quantitative or qualitative?

Question 15

Do you agree that during the Interim Period, where an issuer has yet to provide information required in paragraph 11 of Part D of the Proposed Appendix 27, it should make the interim disclosures as set out in the paragraph immediately following paragraph 11 of Part D of the Proposed Appendix 27?

Yes

Please provide reasons for your views.

Agree. The issuer should show their commitment and intention to provide relevant information.

Question 16

Do you agree to require disclosure of the process an issuer uses to identify, assess and manage climate-related risks as set out in paragraph 12(a) of Part D of the Proposed Appendix 27?

Yes

Please provide reasons for your views.

Agree. It ensures the credibility of the information disclosed. But also, it is suggested that the HKEx could publish guide on how to carry out the risk assessment

Question 17

Do you agree that issuers may opt to disclose the process used to identify, assess and manage climate-related opportunities as set out in paragraph 12(b) of Part D of the Proposed Appendix 27?

Yes

Please provide reasons for your views.

Agree. There could be an interim period for those issuers who have not yet set up the required process to get prepared.

Question 18(a)

Do you agree with the proposed approach for the disclosure of scope 1 and scope 2 emissions and the related information as set out in paragraphs 13 to 14 of Part D of the Proposed Appendix 27?

Yes

Please provide reasons for your views.

Agree. They are similar to current practices.

Question 18(b)

Do you agree with the proposed approach for the disclosure of scope 3 emissions and the related information as set out in paragraphs 13 to 15 of Part D of the Proposed Appendix 27?

Yes

Please provide reasons for your views.

Partial agree. The disclosure of scope 3 is needed, however, the coverage of scope 3 is too broad. It is suggested that the HKEx could define a reasonable scope for the disclosure of

scope 3, in order to ensure a fair and comparable information.

Question 19

Do you agree with the proposed approach for the interim disclosures in respect of scope 3 emissions during the Interim Period as set out in the paragraph immediately following paragraph 15 of Part D of the Proposed Appendix 27?

Yes

Please provide reasons for your views.

Partial agree. The disclosure of scope 3 is needed, however, the coverage of scope 3 is too broad. It is suggested that the HKEx could define a reasonable scope for the disclosure of scope 3, in order to ensure a fair and comparable information.

Question 20(a)

Do you agree to require disclosure of the amount and percentage of assets or business activities vulnerable to transition risks as set out in paragraph 16 of Part D of the Proposed Appendix 27?

No

Please provide reasons for your views.

Disagree. Relevant disclosure is still controversial and unclear at this stage. Most companies are not ready.

Question 20(b)

Do you agree with the proposed interim disclosures during the Interim Period in respect of the metric regarding transition risks as set out in the paragraph immediately following paragraph 16 of Part D of the Proposed Appendix 27?

No

Please provide reasons for your views.

Disagree. Relevant disclosure is still controversial and unclear at this stage. Most companies are not ready.

Question 21(a)

Do you agree to require disclosure of the amount and percentage of assets or business activities vulnerable to physical risks as set out in paragraph 17 of Part D of the Proposed Appendix 27?

No

Please provide reasons for your views.

Disagree. Relevant disclosure is still controversial and unclear at this stage. Most companies are not ready.

Question 21(b)

Do you agree with the proposed interim disclosures during the Interim Period in respect of the metric regarding physical risks as set out in the paragraph immediately following paragraph 17 of Part D of the Proposed Appendix 27?

No

Please provide reasons for your views.

Disagree. Relevant disclosure is still controversial and unclear at this stage. Most companies are not ready.

Question 22(a)

Do you agree to require disclosure of the amount and percentage of assets or business activities aligned with climate-related opportunities as set out in paragraph 18 of Part D of the Proposed Appendix 27?

No

Please provide reasons for your views.

Disagree. Relevant disclosure is still controversial and unclear at this stage. Most companies are not ready. Also, it may need audit and valuation personnel to get involve

Question 22(b)

Do you agree with the proposed interim disclosures during the Interim Period in respect of metrics regarding climate-related opportunities as set out in the paragraph immediately following paragraph 18 of Part D of the Proposed Appendix 27?

No

Please provide reasons for your views.

Disagree. Relevant disclosure is still controversial and unclear at this stage. Most companies are not ready.

Question 23(a)

Do you agree to require disclosure of the amount of capital expenditure, financing or investment deployed towards climate-related risks and opportunities as set out in paragraph 19 of Part D of the Proposed Appendix 27?

Yes

Please provide reasons for your views.

Agree. As relevant disclosure is in relation to the issuer's financial performance. Noteworthy that relevant disclosure may require the collaboration with audit and valuation personals.

Question 23(b)

Do you agree with the proposed interim disclosures during the Interim Period in respect of the metric regarding capital deployment as set out in the paragraph immediately following paragraph 19 of Part D of the Proposed Appendix 27?

Yes

Please provide reasons for your views.

Agree. It provides a transition period for issuers to get prepared for the new requirements. Also showing the commitment and intention of the issuer to provide quantitative disclosure.

Question 24

Do you agree that where an issuer maintains an internal carbon price, it should disclose the information as set out in paragraph 20 of Part D of the Proposed Appendix 27?

Yes

Please provide reasons for your views.

Partial agree. Internal carbon pricing help companies to reduce emissions, however, this is a relatively new idea in Hong Kong and issuers may find it difficult to implement.

Question 25

Do you agree with the proposed approach for the disclosure of how climate-related considerations are factored into remuneration policy as set out in paragraph 21 of Part D of the Proposed Appendix 27?

Yes

Please provide reasons for your views.

Agree. It could raise the management's attention on climate-related issues.

Question 26

Do you agree with the proposed approach for the industry-based disclosure requirements prescribed under other international ESG reporting frameworks such as the SASB Standards and the GRI Standards as set out in paragraph 22 of Part D of the Proposed Appendix 27?

Yes

Please provide reasons for your views.

Agree. Depending on the industry sector of an issuer, climate-related risks faced vary.

Question 27

Do you have any comments regarding whether the manner in which the proposed consequential amendments are drafted will give rise to any ambiguities or unintended consequences?

Yes

Please elaborate.

We would expect more guidance on those disclosures related to financial performance

Question 28

Do you have any comments regarding the topics/matters that we intend to give guidance on?

Yes

Is there any particular topic/matter you consider further guidance to be helpful?

Yes

Please elaborate.

Overall, the disclosure requirements are well-presented, but we would expect more details/explanation for scope 3 disclosure

Question 29

Do you have any feedback on the new developments announced by the ISSB subsequent to the publication of this paper that may impact on the proposals in this paper?

Yes

Please share your views with us.

It is expected that the HKEx should further discuss and analyse the new ISSB updates, which might help fill the existing gaps