

**From:** [REDACTED]  
**Sent:** Monday, September 16, 2019 10:12 AM  
**To:** response <response@hkex.com.hk>  
**Subject:** Re: Consultation Paper on Codification of General Waivers and Principles Relating to IPOs and Listed Issuers and Minor Rule Amendments

**WARNING: External email, please exercise caution.**

Dear Sir

I refer to the above consultant paper published in August 2019. From the perspective of a Hong Kong stock investor, I am supportive to the general waivers and principles relating to IPOs. However, I strongly object the proposed codification on waiver of appointment of a qualified company secretary.

HKEX is one of the largest stock market globally and it is understandable for it to grant some waivers to issuers so as to increase its competitiveness. It is a common interest for HKEX and market participants to maintain high market quality and sustainability. From an investor perspective, I would rely on issuers' management team to run the business; qualified company secretary to ensure listing rules compliance; qualified accountants to ensure financial disclosures. They are the 3 key fundamentals to run a "healthy" company. With these personnel in place, investors can then analysis the financial performance and make investment decision.

The intention of appointing a qualified company secretary in Hong Kong is to ensure listed issuers will have an in-house personnel to comply with the Hong Kong listing rules. As such, HKEX should only grant the waiver on a very limited occasion. I believe the proposed 3 conditions for waivers are not relevant factors to ensure listing rules compliance.

According to the 2018 annual report of HKEX, there are 2,315 listed companies. As stated in the 2018 annual report of HKICS, there are 5,800 members. Therefore, there are plenty of supply of qualified company secretary in Hong Kong. These HKICS members are familiar with good governance policies and Hong Kong listing rules compliance. Similar to other professionals, they are also required to attend at least 15 hours of CPD every year in order to keep their knowledge updated. As an investor, I will be more comfortable to have a qualified company secretary personnel to take care the listing rules compliance. Thank you for consideration.

Regards

An investor in Hong Kong