

**From:** [REDACTED]  
**Sent:** Tuesday, August 27, 2019 6:44 PM  
**To:** response <response@hkex.com.hk>  
**Subject:** Strong objection to general waiver

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

Dear Sir/Madam,

I strongly disagree with your proposed amendment to Listing Rule which enables an unqualified person to act as company secretary of an issuer (namely Note 3 to Listing Rules 3.28 for a general waiver). This amendment would open a floodgate which hampers our robust regulatory framework for listed companies. An issuer in HK must comply with HK securities listing regime. No matter how well versed an overseas professional is in his domicile jurisdiction, he would inevitably need professional advice and assistance from HK professionals. A locally qualified professional (e.g. Member of HKICPA/HKICS/HKLS) is the best person to act as company secretary.

I understand that the Exchange is eager to attract more overseas and mainland companies to be listed here, yet I don't agree that the professional standard of corporate governance should be compromised as proposed solely for business opportunities. I hope that the Exchange can appreciate that this radical proposal is not popular among both the financial and professional sectors and thus retreat from that deeply worrying proposal.

I can be contacted by email or at [REDACTED].

Regards,

CHEUNG Wing-kit

HKID no. [REDACTED]

[Sent from Yahoo Mail on Android](#)