

**From:** [REDACTED]  
**Sent:** Wednesday, September 18, 2019 10:03 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/ Madam,

I strongly disagree with the HKEX proposal on the codification of the waiver of company secretary requirements. It would allow persons with no relevant experience, with assistance by a qualified company secretary, to be a company secretary for up to 3 years at a listed company. At the end of the 3-year waiver period, the unqualified company secretary will presumably be deemed to have the relevant experience required under Rule 3.28. Within and after the waiver period, there is no formal assessment on such appointed company secretary. I consider it is time to fill a loophole, rather than the codification of the waiver.

Thank you.

Regards,  
Chris Siu