

**From:** [REDACTED]  
**Sent:** Wednesday, August 28, 2019 1:53 PM  
**To:** response <response@hkex.com.hk>  
**Subject:** Strong Objection to Rule 3.28 Waivers

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

To whom it may concern,

I strongly objects to the proposed codification of the waiver from strict compliance with Rule 3.28 of the Listing Rules set out under paragraphs 66-71 of the Consultation Paper.

The chartered company secretary is the professional qualified person to the company. If the company can appoint an unqualified person to become a company secretary with hand-holding by a qualified company secretary for up to 3 years, it will undermine the status of the chartered company secretary. It is also extremely unfair to those registered student members who strive to become a chartered company secretary because lots of effort had been put for taking the HKICS professional exams. In other words, the importance of a chartered company secretary is much underestimated by this proposed listing rule.

Yours sincerely,  
A member of HKICS