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From: [REDACTED]
Sent: Friday, October 9, 2020 10:55 AM
To: response
Subject: Comments on Consultation Paper on Review of Listing Rules Relating to Disciplinary Powers and Sanctions

WARNING: External email, please exercise caution.

To whom it may concern

I, as a practicing company secretary for our clients in a professional firm, would like to give some comments on the above Consultation Paper Aug 2020.

First of all, our role as a company secretary is of supporting in nature as stated under Section F of the Corporate Governance Code. "The company secretary plays an important role in supporting the board by ensuring good information flow within the board and that board policy and procedures are followed."

We are also of advisory role under "Guidance for Boards and Directors" published by the Exchange in July 2018.

However, the example mentioned under paragraph 93(c) of the Consultation Paper, that the board secretary, presumably the named company secretary, is proposed for secondary liability and sanctions for "failure to identify the missing information in the announcement partly contributed to the listed issuer's breach."

The board secretary (company secretary) is mainly involved in the announcement production and authorization process, and he/she may not have all the details in regard to the underlying transaction.

These restrictions also apply to external company secretary as I am.

We are, in actual fact, in the same position offering services to the public as other service providers, such as accountants and lawyers. No different.

The "Guidance for Boards and Directors" also recognizes that an external service provider may not have day-to-day knowledge of the issuer's affairs.

Thank you.

PLEASE DO NOT DISCLOSE MY NAME TO THE PUBLIC. THANK YOU!

Yours truly

[REDACTED]

[REDACTED]