

[REDACTED]

From: Angela Tsang [REDACTED]
Sent: Friday, October 9, 2020 12:49 PM
To: response; Angela Tsang
Subject: Fwd: FW: IMPORTANT - HKICS/Consultation Paper on Review of Listing Rules relating to Disciplinary Powers and Sanctions

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Dear Sirs,

I refer to your Consultation Paper regarding the above captioned in August 2020. I, being a member of The Hong Kong Institute of Chartered Secretaries, would like to express my disagreement with the proposed imposition of secondary disciplinary liability

on the company secretary and hereby lodge my objection.

My view is as a company secretary only serves the function as an advisory and supporting role within the board, it seems unreasonable for the company secretary to be held liable for material inaccuracy of the information in announcements so long as he or she has not failed to meet the professional standards as a company secretary in discharging his or her roles and duties. It is not fair to regard a company secretary having participated in a contravention of the Listing Rules solely by being involved in the announcement preparation and issuance approval process, since he or she may not always be in a position to have details of the transaction.

If a company secretary is found having failed to meet the professional standard. I recommend [disciplinary issue should be dealt with by our Institute which will determine the appropriate action to be taken.](#)

Thank you for your attention.

Regards,

Angela Tsang