

Submitted via Qualtrics

(Anonymous)

Company/Organisation view

Listed Company

Question 1

Do you agree with the Electronic Instructions Proposal as detailed in paragraphs 29 to 45 of the Consultation Paper?

Yes

Please give reasons for your views.

Yes agreed.

However, there are a wide variety of Non-Meeting Instructions and some may not be easy to digitise (for example corporate actions where a share certificate is required to be surrendered). Therefore, the exception provided may need to go further than just provisional allotment letters.

Question 2

Do you agree with the implementation timeline (including the availability of transitional arrangements) for the Electronic Instructions Proposal as set out in paragraphs 47 to 54 of the Consultation Paper?

Yes

Please give reasons for your views.

Question 3

Do you agree with the Real-time Electronic Payment Proposal as detailed in paragraphs 69 to 74 of the Consultation Paper?

No

Please give reasons for your views.

- Issuers should not be forced to give CHATS as a payment option. We agree that issuers should have an electronic payment service, but this should not be mandated to be CHATS, when other electronic payment methods are available like Autopay.

- [REDACTED] had 29,321 shareholders use Autopay for the September 2024 dividend (50% of registered shareholders) and we see no advantage to offering CHATs as an additional means of payment.
- Computershare have also questioned if they would be able to process dividends through CHATs for issuers and may need issuers to do this themselves. Issuers would not want to separate the payment of dividends between the registrar and a manual process they have to run themselves.
- Per our understanding internally at [REDACTED], CHATS will be more difficult to process with Computershare than Autopay and CHATS charges are higher than Autopay. Most of our current Autopay payments are already sent out via Faster Payment Service (FPS), FPS should be more convenient and efficient.
- We would support issuers being mandated to have an electronic payment system in place, but do not feel that a specific system like CHATS should be mandated.

Question 4

Do you agree with the Electronic Subscription Monies Proposal as detailed in paragraphs 83 to 89 of the Consultation Paper?

Yes

Please give reasons for your views.

- Yes agreed.
- However, the implementation timeline does not match those of question 2 in the consultation, regarding Electronic Instructions. These timelines should align so that Electronic Instructions and Electronic Payments match.

Question 5

Do you agree that MMOs should no longer be available to issuers as set out in paragraph 99 of the Consultation Paper?

Yes

Please give reasons for your views.

Question 6

Do you agree with the Hybrid General Meeting and E-voting Proposal as detailed in paragraphs 129 to 134 of the Consultation Paper?

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Yes

Please give reasons for your views.

Question 7

Should issuers be required to provide securities holders with an option to attend general meetings remotely and vote via electronic means (as set out in paragraph 135 of the Consultation Paper)?

No

Please give reasons for your views.

██████ has held a Hybrid meeting for the past four years which includes the ability for shareholders to watch the meeting live online and vote via electronic means during the meeting. This set-up requires the use of technology which can be very expensive and can also bring technology risk to the meeting if the technology fails. These costs and risks may not be appropriate for small issuers who have low attendance to their shareholder meetings. The holding of Hybrid meetings should remain a choice for issuers.

Question 8

Should web accessibility guideline(s) (e.g. WCAG) be incorporated into, or referred to, in the Listing Rules (for example, the CG Code) or the Exchange's guidance, such that any corporate communications made available on issuers' website under the Rules should conform to such guideline(s), as set out in paragraph 146 of the Consultation Paper?

Yes

Please give reasons for your views.

Yes agreed as this is market standard. This should maybe be guidance and recommendation rather than mandated.

Question 9

Do you agree with adding a new note to MB Rule 13.46(1) to clarify that the conditions for granting waivers from the publication and distribution requirements of annual results/reports also apply to issuers that are neither overseas issuers nor PRC issuers (see paragraph 151 of the Consultation Paper)?

Yes

Please give reasons for your views.

Ticked Yes, but have no comment on this question

Question 10(a)

Do you agree with the following proposed amendments to align requirements:

To amend paragraph 12B of Appendix D2 to the MB Rules (GEM Rule 18.39B) to remove the annual affirmation requirement for independent non-executive director (see paragraph 152 of the Consultation Paper)?

Yes

Please give reasons for your views.

Question 10(b)

Do you agree with the following proposed amendments to align requirements:

Amend MB Rule 9.11(33) (GEM Rule 12.25(2)) to more accurately reflect the documentary requirements for the registration of a prospectus of C(WUMP)O (see paragraph 154 of the Consultation Paper)?

Yes

Please give reasons for your views.

Ticked Yes, but have no comment on this question

Question 10(c)

Do you agree with the following proposed amendments to align requirements:

To remove GEM Rule 18.50C to align the requirement on the timeframe for submission of annual report with the MB Rules (see paragraph 155 of the Consultation Paper)?

Yes

Please give reasons for your views.

Ticked Yes, but have no comment on this question

Question 10(d)

Do you agree with the following proposed amendments to align requirements:

To align the market capitalisation information required on Main Board and GEM listing application forms (see paragraph 157 of the Consultation Paper)?

Yes

Please give reasons for your views.

Ticked Yes, but have no comment on this question

Question 11

Do you agree with the proposal to amend MB Rule 2.07C to cover the types of announcements mentioned in paragraphs 158 and 159 of the Consultation Paper?

Yes

Please give reasons for your views.

Ticked Yes, but have no comment on this question

Question 12

Do you agree with the proposal to amend MB Rule 37.06 as mentioned in paragraphs 161 to 164 of the Consultation Paper?

Yes

Please give reasons for your views.

Ticked Yes, but have no comment on this question

Question 13

Do you agree with the proposal to clarify the scope of Professional Debt Issuers' continuing obligation to notify the Exchange of their proposals to amend trust deed (see paragraphs 165 and 166 of the Consultation Paper)?

Yes

Please give reasons for your views.

Ticked Yes, but have no comment on this question

Question 14

Do you agree with the proposal to clarify the scope of Professional Debt Issuers' continuing obligation to submit financial statements to the Exchange (see paragraphs 167 and 168 of the Consultation Paper)?

Yes

Please give reasons for your views.

Ticked Yes, but have no comment on this question

Question 15

Do you agree with the proposal to revise the scope of Public Debt Issuers' continuing obligation to inform and submit drafts to the Exchange with respect to their proposal to amend documents that affect the rights of the holders of their listed debt securities (see paragraphs 169 to 171 of the Consultation Paper)?

Yes

Please give reasons for your views.

Ticked Yes, but have no comment on this question

Question 16

Do you agree with the proposal to clarify the validity period of a debt programme under MB Rule 37.41 (GEM Rule 30.34) (see paragraphs 172 and 173 of the Consultation Paper)?

Yes

Please give reasons for your views.

Ticked Yes, but have no comment on this question

Question 17

Do you agree with the proposal to revise the definition of supranationals under the MB Rules (see paragraphs 174 and 175 of the Consultation Paper)?

Yes

Please give reasons for your views.

Ticked Yes, but have no comment on this question

Question 18

Do you agree with the proposal to require all Public Debt Issuers (except States and supranationals) to publish the English and Chinese versions of their financial statements (see paragraphs 176 to 178 of the Consultation Paper)?

Yes

Please give reasons for your views.

Ticked Yes, but have no comment on this question

Question 19

Do you agree with the proposal to replace references to “general meeting” with “meeting of holders of the debt securities” in paragraph 9 of Appendix A2

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to the MB Rules (paragraph 9 of Appendix A2 to the GEM Rules) (see paragraphs 179 and 180 of the Consultation Paper)?

Yes

Please give reasons for your reviews.

Ticked Yes, but have no comment on this question