

**Submitted via Qualtrics**

**Allied Environmental Consultants**

**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.**

Tailored Solutions for Issuers. The proposal permits issuers to choose mechanisms for receiving electronic instructions, whether via email or a dedicated platform, making the system adaptable. This flexibility respects the diversity in issuers' operational capacities and allows them to adopt systems that match their current infrastructure, which minimizes disruption and implementation costs.

Authentication Flexibility. The proposal allows issuers to select the authentication method that fits their specific needs. This flexibility ensures that issuers can meet their security and authentication requirements without imposing a uniform, potentially burdensome system.

Exclusion of Certain Issuers. The proposal sensibly excludes certain types of issuers where meeting instructions or corporate communications are either not required or not relevant. This ensures that the proposal remains focused on applicable sectors, avoiding unnecessary complexity for issuers where such electronic communication options are not needed.

**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.**

Flexibility through Transitional Arrangements: The transitional arrangements provide flexibility for issuers that may face challenges in immediately implementing electronic

instructions. This flexibility is critical in ensuring a smooth transition, particularly for issuers with more complex systems or legal frameworks that may require additional time to implement changes. This allows for any issues to be addressed in a controlled manner, ultimately leading to better long-term outcomes for both issuers and securities holders.

### **Question 3**

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

Yes

**Please give reasons for your views.**

Enhanced Efficiency and Transparency: Implementing real-time electronic payments via CHATS ensures that securities holders receive corporate action proceeds faster and with greater transparency. In a global financial environment, the ability to offer near-instantaneous payments is a significant upgrade. Real-time payment systems reduce the uncertainty associated with delayed or manual payment processes, which could improve investor confidence.

### **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.**

Consistency with FINI System and Other Markets: The proposal aligns with the FINI (Fast Interface for New Issuance) system, which aims to digitize and expedite the IPO process. Additionally, many international markets have already embraced electronic payments for public offerings. Aligning with these global practices ensures that the Hong Kong market remains competitive and in step with international norms.

### **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.**

Consistency in Subscription Methods: The proposal offers a consistent approach to handling different types of securities. By mandating online-only subscriptions for public offers of equity securities and CISs, the process is standardized, reducing the confusion that can arise from having multiple subscription methods. Although debt securities continue to be offered through established channels, the consistency of

moving towards electronic solutions for equity and CIS offerings ensures clarity for issuers and investors alike.

### **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?**

Yes

**Please give reasons for your views.**

**Alignment with Technological Trends:** The proposal reflects the growing use of technology in corporate governance. E-voting and virtual meetings have become increasingly popular, especially in the wake of the COVID-19 pandemic, which necessitated remote participation in many aspects of business. By embracing these technologies, companies can modernize their governance practices, streamline processes, and reduce the logistical challenges associated with organizing and attending physical meetings.

**Flexibility and Inclusiveness:** Hybrid general meetings, which combine physical and virtual attendance, allow shareholders who are unable to attend physically to participate virtually. This is particularly useful for international investors or those with mobility issues, ensuring broader participation. The introduction of hybrid meetings strengthens corporate governance by ensuring that all stakeholders can exercise their voting rights.

### **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)?**

Yes

**Please give reasons for your views.**

**Improved Shareholder Engagement:** Offering an electronic option for attending and voting at general meetings enhances engagement, particularly for smaller shareholders who may otherwise be discouraged from attending due to time or travel constraints. This promotes a more inclusive and democratic decision-making process within the company.

### **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.**

Enhancing Corporate Reputation and ESG Practices: Adopting WCAG into the Listing Rules would reflect positively on issuers' commitment to corporate social responsibility and inclusivity. This demonstrates attention to the "Social" component of ESG (Environmental, Social, and Governance) criteria. Companies prioritizing accessibility show they value all their stakeholders, which can enhance their reputation and potentially increase investor trust.

### **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.**

Applying the same waiver conditions across all issuers, regardless of their geographical location or categorization, promotes fairness and consistency in how the Listing Rules are implemented. It ensures that all issuers, whether domestic, overseas, or PRC-based, are subject to the same standards and have equal access to waivers when appropriate.

### **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)?**

No

**Please give reasons for your views.**

We do not agree with the proposed amendment to remove the annual affirmation requirement for independent non-executive directors (INEDs). While we recognize the effort to reduce the administrative burden on issuers, the annual affirmation

serves an important function in reinforcing the independence and objectivity of INEDs.

**Preventing Conflicts of Interest:** The annual affirmation acts as a safeguard against potential conflicts of interest. Removing it could create a perception that the entity is relaxing its focus on ensuring directors remain independent, which may negatively impact investor confidence.

**Consistency in Governance:** Issuers benefit from consistent governance practices. An annual affirmation requirement helps ensure that all INEDs, regardless of whether they are overseas or PRC issuers, are held to the same high standard. Without this, there could be an uneven playing field, particularly between different types of issuers.

### **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.**

**MB Rule 9.11(33):** This rule requires issuers to submit a set of documents to the Stock Exchange of Hong Kong before the prospectus can be registered, to ensure compliance with local regulations.

**GEM Rule 12.25(2):** Similar to the MB Rule, this rule applies to companies listed on the Growth Enterprise Market (GEM) and mandates them to provide the necessary documentation for prospectus registration.

Amendment is necessary to ensure that issuers are following the correct legal procedures and submitting all necessary documents required for prospectus registration, thereby improving clarity and consistency in the listing process.

**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.**

Agreed with the explanation stated in paragraph 155. The removal of GEM Rule 18.50C avoids the redundancy of submission deadlines, given that the primary focus is on the timely publication of reports, which both rules already cover.

**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.**

By aligning the forms, both the total market capitalisation and the market capitalisation of the securities for which listing is sought will be required. This ensures that relevant market information is complete and consistent. Stakeholders can also receive clearer and more comparable data across both markets.

**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.**

Timeliness and Market Responsiveness: Allowing Professional Debt Issuers to release announcements during trading hours, under prescribed conditions, ensures that significant information reaches the market promptly. This enables issuers to communicate material developments efficiently without waiting for the close of trading, which can be critical for timely decision-making by investors.

Improved Market Transparency: By permitting real-time announcements, the market will benefit from enhanced transparency. Investors will have access to important information as it becomes available, fostering a more informed and dynamic trading environment.

### **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.**

Flexibility to Mitigate Blackout Periods: The amendment provides flexibility by allowing issuers to submit audited interim financial statements for the first six months of a financial year that ends no more than 15 months before the intended listing. This is crucial to prevent unnecessary delays in listing due to blackout periods, where issuers might otherwise be ineligible to list debt securities before their most recent financial statements are finalized.

Improved Issuer Access: By introducing this interim financial statement option, more issuers will be able to meet the eligibility criteria for listing debt securities

### **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.**

Expanding the scope of notification to include amendments beyond trust deeds enhances transparency. This ensures that investors are informed of any changes that may affect their rights, promoting greater trust and protection for debt holders.

### **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.**

Investors benefit from the submission of formal financial statements, as these provide a more comprehensive view of an issuer's financial health compared to potentially less detailed interim reports. This enhances investor confidence in the transparency and accuracy of information disclosed, supporting HKEX's broader goal of promoting market integrity.

**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.**

By requiring issuers to submit drafts of proposed amendments, the Exchange can assess whether the changes have material implications for investors. This creates a safeguard against any unilateral amendments that might adversely affect the rights of debt holders, ensuring that investor interests are considered in every decision.

**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.**

Clarifying the validity period of a debt programme under MB Rule 37.41 and GEM Rule 30.34 ensures that issuers, investors, and other stakeholders are fully aware of the time frame within which debt securities can be issued. This avoids any ambiguity and provides a clear timeline for both issuance and investment planning.

The clarification also reduces the risk of non-compliance by ensuring that issuers do not mistakenly issue debt securities outside the valid timeframe of their programme. This supports better regulatory adherence and minimizes legal or operational risks associated with invalid debt issuances.

**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.**

The proposal to revise the definition of "supranationals" by referencing the list of multilateral agencies in the Securities and Futures Ordinance (SFO) adds precision and transparency. This change ensures that market participants have a clear understanding of which entities qualify as supranationals.

### **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.**

Requiring Public Debt Issuers to publish their financial statements in both English and Chinese enhances accessibility for a broader range of investors. This dual-language requirement ensures that both local and international stakeholders can review and assess the issuer's financial position, fostering inclusivity in the market.

### **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 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.**

The proposal to replace "general meeting" with "meeting of holders of the debt securities" more accurately reflects the nature of meetings concerning debt securities. This change ensures that the terminology aligns with the specific context of debt holders.