

**Submitted via Qualtrics**

**Anonymous  
Company / Organisation  
Listed Company**

**Question 1**

**Do you agree with our proposal to remove the documents identified in Table 1 in Schedule II of the Consultation Paper and that doing so will not jeopardise market quality?**

Yes

**Please give reasons for your views.**

**Question 2**

**Do you agree with our proposal to codify the relevant obligations into the Listing Rules or Guidance Materials and repeal the undertakings, confirmations and declarations as set out in Table 2 in Schedule II of the Consultation Paper?**

Yes

**Please give reasons for your views.**

**Question 3**

**Do you agree with our proposal to repeal the requirement for listing agreements for listing of debt securities (except for debt issues to professional investors), structured products and interests in CIS and investment companies by codifying the relevant obligations as set out in Table 3 in Schedule II of the Consultation Paper?**

Yes

**Please give reasons for your views.**

**Question 4**

**Do you agree with our proposal to incorporate in the Listing Rules an issuer's obligation to obtain necessary authorisations and consents for its actions set out in Part (e) of Table 1 in Schedule II of the Consultation Paper?**

Yes

**Please give reasons for your views.**

**Question 5**

**Do you agree with our proposal to require the submission of the overarching undertakings from new applicants and sponsors in the Form A1 referred to in paragraph 38 of the Consultation Paper?**

Yes

**Please give reasons for your views.**

**Question 6**

**Do you agree with our proposal to consolidate the requirement for personal particulars of directors/ supervisors in Form FF004?**

Yes

**Please give reasons for your views.**

**Question 7**

**Do you agree with our proposal to remove signature and/or certification requirements for documents set out in Table 5 in Schedule II of the Consultation Paper?**

Yes

**Please give reasons for your views.**

**Question 8**

**Do you agree with our proposal to remove from the Listing Rules any requirement for submission of multiple copies of the same document and to require submission of one electronic copy only in respect of the documents set out in Table 6 in Schedule II of the Consultation Paper?**

Yes

**Please give reasons for your views.**

**Question 9**

**Do you agree with our proposal to mandate electronic means as the only mode of submission to the Exchange unless otherwise specified in the Listing Rules or required by the Exchange?**

Yes

**Please give reasons for your views.**

**Question 10**

**Do you agree with our proposal to mandate the digitalisation of the prospectus authorisation and registration processes?**

Yes

**Please give reasons for your views.**

**Question 11**

**Do you agree with our proposal to amend the Listing Rules to mandate that listed issuers must disseminate corporate communications to their securities holders electronically if this is permitted by their applicable laws and regulations and their constitutional documents?**

Yes

**Please give reasons for your views.**

We agree with the proposal and consider that such mandate will significantly reduce the use of papers and promote the principles of ESG among listed issuers. It would also provide greater certainty for securities holders when such standard is mandated across all listed issuers on the Exchange.

To promote better certainty and clarity to securities holders, we suggest that in the event where a listed issuer is restricted by its applicable laws and regulations or its constitutional documents to disseminate corporate communications to its securities holders electronically, it shall disclose such fact in its annual reports.

**Question 12**

**Do you agree with our proposal to allow the consent of holders of a listed issuer's securities to be implied for the electronic dissemination of its corporate**

**communications, to the extent permitted under applicable laws and regulations and its constitutional documents?**

Yes

**Please give reasons for your views.**

We agree with the proposal and consider that an implied consent would provide greater certainty and reduce the administrative burden on listed issuers in implementing the proposal.

**Question 13**

**Do you agree with our proposal to state in the Rules that Actionable Corporate Communications must be sent to the securities holders individually and in electronic form if the holders provide functional electronic contact details?**

Yes

**Please give reasons for your views.**

We agree with the proposal and recommend further clarifications and guidance on what constitutes “Actionable Corporate Communications” as the definition currently proposed under paragraph 90 of the consultation paper may create ambiguity. For instance, while paragraphs 91 and 92 state that notices of general meeting and proxy forms are not considered “Actionable Corporate Communications”, the position for the circulars that are usually disseminated alongside such notices and proxy statements on whether they are considered “Actionable Corporate Communications” is not clear under the consultation paper. It may confuse securities holders when certain documents (especially those relating to the same general meeting) are received individually while others have to be viewed separately on the websites of the listed issuer or the Exchange. On this basis, we suggest that listed issuers be provided with a detailed list of documents that would constitute “Actionable Corporate Communications” to avoid any potential confusion.

**Question 14**

**Do you agree that where a listed issuer does not have functional electronic contact details of a securities holder, an Actionable Corporate Communication must be sent to the holder in hard copy form including a request for the security holder’s electronic contact details to facilitate electronic dissemination of Actionable Corporate Communications in future?**

Yes

**Please give reasons for your views.**

Subject to a clear scope and definition of “Actionable Corporate Communication” as elaborated in our response to Question 13 above, we agree with the proposal and

suggest to further clarify as to what constitutes “electronic contact details” given the popularity of certain social media channels.

We also suggest that the Exchange provide guidance to listed issuers in situations where (i) the electronic contact details provided by the shareholders are invalid, obsolete or duplicated; or (ii) there is an electronic delivery failure (such as returned or bounced e-mails).

**Question 15**

**As your answer to Question 13 above is yes, do you agree that we should define Actionable Corporate Communications as “any corporate communication that seeks instructions from an issuer’s securities holders on how they wish to exercise their rights as the issuer’s securities holders”?**

Yes

**Please give reasons for your views.**

Please refer to our response to Question 13 above.

**Question 16**

**We invite comments on the manner in which the Appendices to the Listing Rules are proposed to be categorised/amended and whether they will give rise to any ambiguities or unintended consequences.**

**Question 17**

**Do you agree with our proposal to remove the requirement for physical attendance by members to meet the quorum needed for meetings of the Listing Committee and Listing Review Committee?**

Yes

**Since your answer is “no”, please give reasons for your views.**

**Question 18**

**Do you agree with our proposal to make minor changes to the Listing Rules described in paragraph 122 to reflect current practices and requirements?**

Yes

**Since your answer is “no”, please give reasons for your views.**

