

Part B Consultation Questions

Please reply to the questions below that are raised in the Concept Paper downloadable from the HKEX website at:

<http://www.hkex.com.hk/eng/newsconsul/mktconsul/Documents/cp2017061.pdf>

Please indicate your preference by checking the appropriate boxes.

Where there is insufficient space provided for your comments, please attach additional pages.

1. What are your views on the need for Hong Kong to seek to attract a more diverse range of companies and, in particular, those from New Economy industries to list here? Do you agree that the New Board would have a positive impact on Hong Kong's ability to attract additional New Economy issuers to our market?

Please give reasons for your views.

New Board will shapren the competitive edge of HKEX as a top-tier financial market and such New Board will definitely attract New Economy industries to HK and thus benefit the makret and overall econmy as a whole.

2. What are your views on whether the targeted companies should be segregated onto a New Board, rather than being included on the Main Board or GEM?

Please give reasons for your views.

New Economy is a different story from traditional indsutries and herein judging from a traditional perspective is not reasonable. The value of New Economy can not be simply assessed via cash flow and New Board actually bestows them a chance to contribute to the economy.

3. If a New Board is adopted, what are your views on segmenting the New Board into different segments according to the characteristics described in this paper (e.g. restriction to certain types of investor, financial eligibility etc.)? Should the New Board be specifically restricted to particular industries?

Please give reasons for your views.

Segmentation according to types of investors and financial eligibility is strongly agreed as potential issuers on New Board are far different from the ones on GEM and Main Board. Restriction to specific industries are not necessary from my viewpoint as current worlds are so volatile and it's hard to define which industries are new and traditional industries may also reborn with revolutionary techs .

4. What are your views on the proposed roles of GEM and the Main Board in the context of the proposed overall listing framework?

Please give reasons for your views.

Main Board and GEM together act as an indispensable fundraising channel in HK and much more like main courses in a meal, while New Board, at least temporarily, much more plays as dessert and appetitizer. A restaurant must guarantee the quality of main courses, but it may become popular due to special flavors of desserts and appetizers.

5. What are your views on the proposed criteria for moving from New Board PRO to the other boards? Should a public offer requirement be imposed for companies moving from New Board PRO to one of the other boards?

Please give reasons for your views.

Agreed at least for moving to Main Board since the Main Board is open to public investors and regulatory institutions should guarantee the consistency and suitability of listed ones for protecting these investors.

6. What are your views on the proposed financial and track record requirements that would apply to issuers on New Board PRO and New Board PREMIUM? Do you agree that the proposed admission criteria are appropriate in light of the targeted investors for each segment?

Please give reasons for your views.

Financial and track record requirements are not necessary as many New Economies are still on the way to monetize its technological developments. As for proposed admission criteria for each segment due to targeted investors, I think it's appropriate .

7. What are your views on whether the Exchange should reserve the right to refuse an application for listing on New Board PRO if it believes the applicant could meet the eligibility requirements of New Board PREMIUM, GEM or the Main Board?

Please give reasons for your views.

Agreed on this matter, otherwise such companies will occupy the market and squeeze out those entities which cannot meet the requirements to list on the other three boards yet in need for fundraising in market for long-term growth.

8. What are your views on the proposed requirements for minimum public float and minimum number of investors at listing? Should additional measures be introduced to ensure sufficient liquidity in the trading of shares listed on New Board PRO? If so, what measures would you suggest?

Please give reasons for your views.

Minimum public float and minimum numbers of investors requirements are necessary

9. What are your views on whether companies listed on a Recognised US Exchange that apply to list on the New Board should be exempted from the requirement to demonstrate that they are subject to shareholder protection standards equivalent to those of Hong Kong? Should companies listed elsewhere be similarly exempted?

Please give reasons for your views.

Listed companies in recognised exchange including but not limited to Recognised US Exchange should also be taken into consideration for automatically suitable for listing in Hong Kong New Board.

10. What are your views on whether we should apply a “lighter touch” suitability assessment to new applicants to New Board PRO? If you are supportive of a “lighter touch” approach, what relaxations versus the Main Board’s current suitability criteria would you recommend?

Please give reasons for your views.

In regard of "lighter touch", different share categories and slightly loose financial requirements are suggestale, while corporation management and other criteria in relation to corporate governance should not be applicable to "lighter touch" since solid corporate strcuture is the cornerstone for sustaible growth in whatsoever industry.

11. What are your views on whether the New Board PRO should be restricted to professional investors only? What criteria should we use to define a professional investor for this purpose?

Please give reasons for your views.

Professional investors can be defined and assessed by length of trading period, professional qualifications etc.

12. Should special measures be imposed on Exchange Participants to ensure that investors in New Board PRO-listed securities meet the eligibility criteria for both the initial placing and secondary trading?

Yes

No

Please give reasons for your views.

13. What are your views on the proposal for a Financial Adviser to be appointed by an applicant to list on New Board PRO, rather than applying the existing sponsor regime? If you would advocate more prescriptive due diligence requirements, what specific requirements would you recommend be imposed?

Please give reasons for your views.

14. What are your views on the proposed role of the Listing Committee in respect of each segment of the New Board?

Please give reasons for your views.

15. Do you agree that applicants to listing on New Board PRO should only have to produce a Listing Document that provided accurate information sufficient to enable professional investors to make an informed investment decision, rather than a Prospectus? If you would advocate a more prescriptive approach to disclosure, what specific disclosures would you recommend be required?

Yes

No

Please give reasons for your views.

Prospectus can be applicable when such listed entities try to move from New Board to Main Board.

16. What are your views on the proposed continuous listing obligations for the New Board? Do you believe that different standards should apply to the different segments?

Please give reasons for your views.

17. For companies that list on the New Board with a WVR structure, should the Exchange take a disclosure-based approach as described in paragraph 153 of this Concept Paper? Should this approach apply to both segments of the New Board?

Please give reasons for your views.

Agreed since investors have the right to know the corporate governance in whatsoever industries.

18. If, in addition, you believe that the Exchange should impose mandatory safeguards for companies that list on the New Board with a WVR structure, what safeguards should we apply? Should the same safeguards apply to both segments of the New Board?

Please give reasons for your views.

Existence of WVR structure and thereof different rights should be defined and limited clearly in Corporate chapter or similar docs and founders of New Economy who are ususally bestowed with WVR structure should have a boundary in corporate governance.

19. Do you agree that the SEHK should allow companies with unconventional governance features (including those with a WVR structure) to list on PREMIUM or PRO under the “disclosure only” regime described in paragraph 153 of the Concept Paper, if they have a good compliance record as listed companies on NYSE and NASDAQ? Should companies listed elsewhere be similarly exempted?

Please give reasons for your views.

Yes, since it's common in New Economy industries, and the allowance and openness to unconventional governance feautres are the prominent features that make US Exchange attractive to New Economy.

20. What are your views on the suspension and delisting proposals put forward for the New Board?

Please give reasons for your views.

Agree since such proposals is applicable and suggestable in volatile New Economy industries.

21. Should New Board-listed companies have to meet quantitative performance criteria to maintain a listing? If so, what criteria should we apply? Do you agree that companies that fail to meet these criteria should be placed on a “watchlist” and delisted if they fail to meet the criteria within a set period of time?

Please give reasons for your views.

The criteria can be defined and customized for different industries. For example, for fintech, the traffic, NPL, all these criteria should be factored into. "Watchlist" and delisting measures are highly recommend from personal view since New Economy is born with the volatility and unpredictability, and such measures to some extent mitigate the risk that some wiped-out New Economy occupy market.

22. Do you consider that an even “lighter touch” enforcement regime should apply to the New Board (e.g. an exchange-regulated platform)?

Yes

No

Please give reasons for your views.

Since potential participants of New Board are limited to professional investors, appropriate lighter touch of enforcement regime is acceptable since these participants are more mature.

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