

**Responses to Consultation Questions
HKEX Consultation Paper on Listing Regime for Overseas Issuers**

**Swire Pacific Limited
(stock codes: 00019 & 00087)**

Question 1

Do you agree that the Equivalence Requirement and the concept of "Recognised Jurisdictions" and "Acceptable Jurisdictions" should be replaced with one common set of Core Standards for all issuers?

Yes

No

Please give reasons for your views.

We agree with the reasons in the consultation paper.

Question 3

Do you agree to codify the current practice that all issuers must conform their constitutional documents to the Core Standards or else demonstrate, as necessary for each standard, how the domestic laws, rules and regulations to which the issuer is subject and its constitutional documents, in combination, provide the relevant shareholder protection under the Core Standards?

Yes

No

Please give reasons for your views.

We agree with the reasons in the consultation paper, on the footing that, as indicated in the paper, we will not be required to amend our constitutional document.

Question 4

Do you believe any other standards or Listing Rules requirements, other than those set out in paragraphs 79 to 137 or Schedule C of the Consultation Paper, should be added or repealed?

Yes

No

Please provide these other standards with reasons for your views.

Question 5

Do you agree that existing listed issuers should be required to comply with the Core Standards?

Yes

No

Please give reasons for your views.

We agree with the reasons in the consultation paper.

All other questions

We are in favour of simplification of the listing regime for overseas issuers. We believe that such simplification will benefit Hong Kong as an international financial centre. Insofar as the proposals in the consultation paper are directed towards such simplification, we support them.