May 8th, 2026

RE: Consultation Paper on Competitiveness Review of Listing Framework

By email: response@hkex.com.hk

Dear Sirs/Madams,

Response to Consultation Paper on the Listing Framework Competitiveness Review

The HKVCA ("we") welcomes the opportunity to respond to the captioned Consultation Paper (the "Paper") issued by The Stock Exchange of Hong Kong Limited (the "Exchange") on 13 March 2026.

We are greatly encouraged by the Exchange's proactive move to further enhance the attractiveness of listing in Hong Kong. As a key participant in the private capital markets, we strongly support initiatives that reinforce Hong Kong's status as a premier international financial centre and a listing destination of choice for high-quality growth companies.

We believe that the proposals set out in the Paper are well-calibrated and will be useful in attracting more innovation and technology-based companies to consider listing in Hong Kong. The proposed reforms strike a reasonable balance between broadening market access and maintaining robust standards of investor protection.

Our specific comments on the key proposals are set out below.

1. Optimising the Weighted Voting Rights (WVR) Regime

We generally support the proposed amendments to the WVR regime, including lowering the financial eligibility thresholds and allowing a higher WVR ratio cap of up to 20:1 for applicants with a market capitalisation of at least HK$40 billion at the time of listing. These changes will help Hong Kong remain competitive with other major listing venues, particularly in attracting WVR-structured companies currently listed in the US.

Caveat: While we agree with the lowering of eligibility requirements, we believe it is equally important to balance the protection of public investors by enhancing monitoring on corporate governance. The Exchange should consider introducing additional governance safeguards for WVR issuers that benefit from the relaxed thresholds, such as enhanced disclosure obligations, periodic reviews of WVR arrangements, or reinforced independent non-executive director oversight. Such measures would help maintain investor confidence while allowing greater flexibility for innovative companies.

2. Ownership Continuity and Control

We consider the proposal on ownership continuity and control to be a pragmatic response to market needs. The relaxation of ownership continuity requirements will provide greater flexibility for companies undergoing pre-IPO fundraising, which is particularly relevant for fast growing innovation and technology-based issuers that frequently engage in multiple financing rounds.

3. Commercialised Biotechnology and Specialist Technology Companies

The proposal to allow commercialised biotechnology companies and specialist technology companies to elect to list under the applicable Chapter 18A or 18C pathways, as summarised in the Paper, is a welcome refinement. This change provides greater clarity and optionality for qualifying issuers and demonstrates the Exchange's responsiveness to industry feedback. We fully support this proposal.

4. Enhancing the Accessibility of Chapter 18A for Medtech Companies

While HKEX maintains that the definition of 'biotech' under Chapter 18A encompasses 'medtech,' the historical lack of successful medtech listings under this chapter remains a concern. Consequently, we first seek formal confirmation that HKEX views medtech companies as viable candidates for this route.

To that end, we would also like to confirm that the proposed changes allowing commercial-stage biotech companies to utilize the Chapter 18A pathway also apply to medtech companies. This flexibility would be highly welcomed, as many medtech firms possess commercial-stage products while continuing to invest heavily in their R&D pipelines.

Furthermore, as Chapter 18A has historically seen limited use by medtech applicants due to their distinct business profiles compared to drug R&D companies, we strongly recommend that the final Consultation Conclusions explicitly include a medtech-specific example. In conjunction with these modifications, it would be highly beneficial for HKEX to reaffirm that pre-revenue medtech companies remain fully welcome to apply under the traditional Chapter 18A framework.

5. Expansion of Confidential Filing

We strongly support the proposal to extend confidential filing of listing applications to all new applicants, as highlighted in the Paper. This measure brings Hong Kong into closer alignment with international best practices (e.g., the US, UK, and Singapore) and reduces the commercial risks associated with public disclosure of sensitive information during the listing process. We agree that this is a well-calibrated proposal that responds directly to the needs of innovation and technology-based issuers.

6. Return Mechanism

The proposed refinement of the return mechanism—including the disclosure of all professional parties involved in the preparation of listing materials upon return of an application—is a constructive measure that enhances accountability among market participants. We support this proposal as it promotes quality control without unduly burdening bona fide applicants.

Concluding Remarks

In summary, we are supportive of the Exchange's proposals as set out in the Paper. The proposed reforms represent a significant step forward in enhancing the competitiveness of Hong Kong's listing framework, and we are confident that they will achieve their stated objectives.

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Should you wish to discuss any of the above comments further, please do not hesitate to contact the undersigned.

Yours faithfully,

[redacted]

About HKVCA

Established in 1987, the Hong Kong Venture Capital and Private Equity Association (HKVCA) represents over 550 members, including 380 private equity managers operating out of Hong Kong. Its mission is to stimulate a vibrant venture capital and private equity industry in Asia while representing the views of its members before governmental and relevant bodies.

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