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It's my belief that diversity is good for the overall effectiveness of the boardroom – and therefore good for business. This is supported by recent research from McKinsey and company which found that ethnically diverse companies were 35% more likely to outperform their peers and gender diverse companies were 15% more likely.

Hong Kong has made progress towards greater board diversity however it is important that we do not lose momentum. It is for this reason that I urge HKEX strengthen the proposals made within it's consultation paper through the introduction of more measurable objectives and clearer guidance on company diversity policies.

Question 1: Do you agree with our proposed amendment to CP A.5.5 as described in paragraph 36? Please give reasons for your views.

NO COMMENT

Question 2: Do you agree with our proposals to upgrade CP A.5.6 to a Rule (Rule 13.92) requiring issuers to have a diversity policy and to disclose the policy or a summary of it in their corporate governance reports? Please give reasons for your views.

I agree with the proposal to upgrade CP A.5.6 to a Rule (Rule 13.92) requiring issuers to have a diversity policy and to disclose the policy or a summary of it in their corporate governance reports. However, I would urge the HKEX to provide companies with recommended best practice and guidelines for the diversity policy. That guidance should include specific reference to gender diversity and measurable objectives to achieve this. I would also like to HKEX to limit the tenure of independent directors to nine years to reduce the lack of diversity due to entrenched Boards.

Question 3: Do you agree with our proposal to amend CP A.5.5 that it requires the board to state in the circular to shareholders accompanying the resolution to elect the director:

- (i) the process used for identifying the nominee;**
 - (ii) the perspectives, skills and experience that the person is expected to bring to the board; and**
 - (iii) how the nominee would contribute to the diversity of the board.**
- Please give reasons for your views.**

I agree with the proposal. However, I would also like to see minority shareholders have a greater voice by requiring separate disclosure of minority shareholder voting for the election of independent directors and where there is not majority support from minority shareholders, that independent director is required to stand for re-election at the following AGM.

Question 4: Do you agree with our proposal to amend Mandatory Disclosure Requirement L.(d)(ii) as described in paragraph 56? Please give

reasons for your views.

Yes I agree. In addition, I would like to see HKEX asking listed companies to disclose their nomination policies.

Question 5: Do you agree with our proposal to revise Rule 3.13 (3) so that there is a three-year cooling off period for professional advisers before they can be considered independent, instead of the current one year? Please give reasons for your views.

NO COMMENT

Question 6: Do you agree with our proposal to revise CP C.3.2 so that there is a three-year cooling off period for a former partner of the issuer's existing audit firm before he can be a member of the issuer's audit committee? Please give reasons for your views.

NO COMMENT

Question 7: Do you agree with our proposal to revise Rule 3.13(4) to introduce a one-year cooling off period for a proposed INED who has had material interests in the issuer's principal business activities in the past year? Please give reasons for your views

NO COMMENT

Question 8: Do you agree with our proposal to introduce a new RBP A.3.3 to recommend disclosure of INEDs' cross-directorships or having significant links with other directors through involvements in other companies or bodies in the Corporate Governance Report? Please give reasons for your views.

NO COMMENT

Question 9: Do you agree with our proposal to introduce a Note under Rule 3.13 to encourage inclusion of an INED's immediate family members in the assessment of the director's independence? Please give reasons for your views.

NO COMMENT

Question 10: Do you agree with our proposal to adopt the same definition for "immediate family member" as Rule 14A.12(1)(a) as set out in paragraph 81? Please give reasons for your views.

NO COMMENT

Question 11: Do you agree with our proposal to amend Mandatory Disclosure Requirement L.(d)(ii) of Appendix 14 to require an issuer to disclose its nomination policy adopted during the year? Please give reasons for your views.

Yes I agree with this proposal. In addition to this I would like to see included within the circular information illustrating the composition of the incumbent board and how the composition would change following the election of the nominated individual.

I also believe the annual disclosure of the nomination policy should include how the company has progressed towards its objectives for achieving gender diversity, by disclosing proportions of men and women on the Board, in senior executive positions and across the whole organisation.

Question 12: Do you agree with our proposal to amend CP A.6.7 by removing the last sentence of the current wording? Please give reasons for your views.

NO COMMENT

Question 13: Do you agree with our proposal to revise CP A.2.7 to state that INEDs should meet at least annually with the chairman? Please give reasons for your views.

NO COMMENT

Question 14: Do you agree with our proposal to introduce CP E.1.5 requiring the issuer to disclose its dividend policy in the annual report? Please give reasons for your views.

NO COMMENT

Question 15: Do you think that the Rules should be amended to allow shareholders' consent to be implied for electronic dissemination of corporate communications by issuers? Please give reasons for your views.

NO COMMENT