

Part B Consultation Questions

Please indicate your preference by checking the appropriate boxes. Please reply to the questions below on the proposed change discussed in the Consultation Paper downloadable from the HKEX website at:

<https://www.hkex.com.hk/-/media/HKEX-Market/News/Market-Consultations/2016-Present/November-2020-MB-Profit-Requirement/Consultation-Paper/cp202011.pdf>

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

Capitalised terms have the same meaning as defined in the Consultation Paper unless otherwise stated.

1. Do you agree that the Profit Requirement should be increased by either Option 1 (150%) or Option 2 (200%)? Please give reasons for your views.

Yes

No

You may provide reasons for your views.

We disagree with the proposed increase targeted at the Profit Requirement. Paragraph 9.(a) noted that Option 1 and Option 2, on average would have eliminated 62% (462) of Profit Requirement Applications between 2016 and 2019 and expected to have similar future impact. Such increase will significantly affect our business as a financial document solutions provider.

2. Besides the proposed increase in the Profit Requirement, is there any other alternative requirement that should be considered? Please give reasons for your views.

Yes

No

You may provide reasons for your views.

We disagree with the proposed increase targeted Profit Requirement. The status quo should be maintained.

3. Do you agree that the Exchange should consider granting temporary relief from the increased Profit Requirement due to the challenging economic environment? Please give reasons for your views.

Yes

No

You may provide reasons for your views.

If an increase is unavoidable, relief should be given. If relief needs to be considered, we question whether the present is the appropriate time to increase the Profit Requirement by the levels proposed in Option 1 and Option 2.

4. If your answer to Question 3 is yes, do you agree with the conditions to the temporary relief as set out in paragraph 55? Please give reasons for your views.

Yes

No

You may provide reasons for your views.

We are a financial document management solutions provider. We abstain from commenting on Listing Rules details. Regarding, Paragraph 55(d) of the Consultation Paper, the validity period criteria should be expanded to start in 2019 when the social unrest in Hong Kong started and to end some time in the future when the impact of COVID-19 is expected to have substantially returned to normality.

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