

**Submitted via Qualtrics**

**Slaughter and May  
Company / Organisation  
Law Firm**

**Question 1**

**Do you agree with the proposed definitions of “Specialist Technology Company”, “Specialist Technology Products” and “Specialist Technology”?**

Yes

**Please give reasons for your views. If your answer is “No”, please provide alternative suggestions.**

We agree with the Exchange’s rationale for the proposal. The Exchange may consider simplifying the definition of “Specialist Technology Company” by deleting the reference to “within an acceptable sector of a Specialist Technology Industry” (which is incorporated through the cross-reference to “Specialist Technology Product” which in turn cross-refers to “Specialist Technology” which contains the phrase “within an acceptable sector of a Specialist Technology Industry”).

**Question 2**

**Do you agree with the list of Specialist Technology Industries and the respective acceptable sectors set out in paragraph 4 of the Draft Guidance Letter (Appendix V to the Consultation Paper)?**

Yes

**Please give reasons for your views. If your answer is “No”, please provide alternative suggestions.**

We agree with the Exchange’s rationale for the proposal. Note 3 to draft Rule 18C.03(1) provides that a Biotech Company relying on a Regulated Product (as defined in Chapter 18A) must submit an application under Chapter 18A. Further clarity on whether a Biotech Company whose Biotech Products are not Regulated Products may submit an application under Chapter 18C would be helpful.

Further clarity on whether a listing applicant may immediately proceed with a listing application on the basis of the Exchange’s affirmative guidance in response to a pre-IPO enquiry confirming eligibility to apply for listing under Chapter 18C (without having to wait for the Guidance Letter to be updated), would also be helpful.

**Question 3**

**Do you agree that the Exchange should take into account the factors set out in paragraph 107 of the Consultation Paper to determine whether a company is “primarily engaged” in the relevant business as referred to in the definition of “Specialist Technology Company”?**

Yes

**Please give reasons for your views.**

We generally agree with the Exchange’s rationale for the proposal. Further clarity on the meaning of “a substantial portion of the total operating expenditure of the Company” in paragraph 7(a) of the Draft Guidance Letter would be helpful. In this connection, we note that a Chapter 18C listing applicant would already be required to satisfy the requirement under draft Rule 18C.03(5) that its investment in the research and development of its Specialist Technology Product(s) must amount to at least 15% (in the case of a Commercial Company) or 50% (in the case of a Pre-Commercial Company) of its total operating expenditure for each of the three financial years prior to listing.

**Question 4**

**Do you agree that the Exchange should retain the discretion to reject an application for listing from an applicant within an acceptable sector if it displays attributes inconsistent with the principles referred to in paragraph 101 of the Consultation Paper?**

Yes

**Please give reasons for your views.**

We agree with the Exchange’s rationale for the proposal. In light of the proposal, we expect that a large number of potential Chapter 18C listing applicants would consider making pre-IPO submissions at an early stage to obtain guidance from the Exchange on their eligibility to list under Chapter 18C.

We note cases such as the electric vehicle manufacturer in LD138-2022 which failed to qualify for WVR due to a lack of a new business model / technology. It would be helpful to understand if there are any substantive differences between the requirement to demonstrate new business model / technology under the WVR regime and the Specialist Technology regime (which we note are phrased similarly). We also note certain acceptable sectors are arguably no longer emerging sectors and the application of the principles referred to in paragraph 101 of the Consultation Paper to such sectors are unclear. Further elaboration would be helpful.

**Question 5**

**Do you agree that the Specialist Technology Regime should accommodate the listings of both Commercial Companies and Pre-Commercial Companies?**

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Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 6**

**Do you agree with the proposed approach to apply more stringent requirements to Pre-Commercial Companies?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 7**

**Do you agree with the proposal that all investors, including retail investors, should be allowed to subscribe for, and trade in, the securities of Pre-Commercial Companies?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 8**

**Do you agree that a Commercial Company applicant must have a minimum expected market capitalisation of HK\$8 billion?**

**Please give reasons for your views.**

We acknowledge the Exchange's rationale for the proposal. We would urge the Exchange to further consider feedback from market participants and stakeholders with a view to striking the right balance between investor protection and the competitiveness of the regime.

**Question 9**

**Do you agree that a Pre-Commercial Company applicant must have a minimum expected market capitalisation of HK\$15 billion at listing?**

**Please give reasons for your views.**

We acknowledge the Exchange's rationale for the proposal. We would urge the Exchange to

further consider feedback from market participants and stakeholders with a view to striking the right balance between investor protection and the competitiveness of the regime.

**Question 10**

**Do you agree that a Commercial Company must have revenue of at least HK\$250 million for the most recent audited financial year?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 11**

**Do you agree that only the revenue arising from the applicant's Specialist Technology business segment(s) (excluding any inter-segmental revenue from other business segments of the applicant), and not items of revenue and gains that arise incidentally, or from other businesses, should be recognised for the purpose of the Commercialisation Revenue Threshold?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal. Revenue arising from products / services that are, or are expected to be, discontinued, should also be excluded. The Exchange may also consider whether adjustments should be required to be made where a listing applicant's revenue for its most recent audited financial year is exceptionally high (e.g. as a result of a one-off geopolitical, social or economic event) and not representative of the listing applicant's revenue levels under normal circumstances.

**Question 12(a)**

**Do you agree that a Commercial Company must demonstrate year-on-year growth of revenue derived from the sales of Specialist Technology Product(s) throughout the track record period, with allowance for temporary declines in revenue due to economic, market or industry-wide conditions?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 12(b)**

**Do you agree that the reasons for, and remedial steps taken (or to be taken) to address, any downward trend in a Commercial Company's annual revenue must be explained to the Exchange's satisfaction and disclosed in the Listing Document?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 13**

**Do you agree that a Specialist Technology Company listing applicant must have been engaged in R&D of its Specialist Technology Product(s) for a minimum of three financial years prior to listing?**

**Please give reasons for your views.**

We acknowledge the Exchange's rationale for the proposed period of three financial years prior to listing. We also note that the Exchange has the discretion to accept a two year trading record period in the circumstances described in the Note to draft Rule 18C.03(2). We would urge the Exchange to further consider feedback from market participants and stakeholders with a view to striking the right balance between ensuring that eligibility is limited to genuine Specialist Technology Companies with a consistent focus on R&D and not discouraging high-quality, fast-growing potential listing applicants with a shorter R&D track record from seeking a listing under the regime.

**Question 14(a)**

**Do you agree that, for a Commercial Company, its total amount of R&D investment must constitute at least 15% of its total operating expenditure for each of its three financial years prior to listing?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposed 15% threshold.

We acknowledge the Exchange's rationale for the proposed period of three financial years prior to listing. We would urge the Exchange to further consider feedback from market participants and stakeholders with a view to striking the right balance between ensuring that eligibility is limited to genuine Specialist Technology Companies with a consistent focus on R&D and not automatically ruling out high-quality, fast-growing potential listing applicants with a shorter R&D track record.

**Question 14(b)**

**Do you agree that, for a Pre-Commercial Company, its total amount of R&D investment must constitute at least 50% of its total operating expenditure for each of its three financial years prior to listing?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposed 50% threshold.

We acknowledge the Exchange's rationale for the proposed period of three financial years prior to listing. We would urge the Exchange to further consider feedback from market participants and stakeholders with a view to striking the right balance between ensuring that eligibility is limited to genuine Specialist Technology Companies with a consistent focus on R&D and not automatically ruling out high-quality, fast-growing potential listing applicants with a shorter R&D track record.

**Question 15**

**Do you agree with the proposed method for determining the amount of qualifying R&D investment and the total operating expenditure as set out in paragraph 141 of the Consultation Paper?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 16**

**Do you agree that a Specialist Technology Company listing applicant must have been in operation in its current line of business for at least three financial years prior to listing under substantially the same management?**

**Please give reasons for your views.**

We acknowledge the Exchange's rationale for the proposal. We would urge the Exchange to further consider feedback from market participants and stakeholders with a view to striking the right balance between ensuring sufficient information is made available for investors to evaluate the performance of the listing applicant and the competitiveness of the regime.

**Question 17**

**Do you agree that there must be ownership continuity and control for a Specialist**

**Technology Company listing applicant in the 12 months prior to the date of the listing application?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 18**

**Do you agree that an applicant applying to list under the proposed regime must have received meaningful investment from Sophisticated Independent Investors (SIIs)?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 19**

**Do you agree with the independence requirements for a Sophisticated Independent Investor as set out in paragraphs 155 to 157 of the Consultation Paper?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 20**

**Do you agree with the proposed definition of a sophisticated investor (including the definition of investment portfolio) as set out in paragraphs 159 to 162 of the Consultation Paper?**

**Please give reasons for your views.**

We acknowledge the Exchange's rationale for the proposed HK\$15 billion and HK\$5 billion thresholds set out in paragraph 160 of the Consultation Paper. We would urge the Exchange to further consider feedback from market participants and stakeholders with a view to striking the right balance between ensuring that the listing applicant has been the subject of extensive research and rigorous due diligence, and the competitiveness of the regime.

**Question 21**

**Do you agree that as an indicative benchmark for meaningful investment, an applicant should have received third party investment from at least two Sophisticated Independent**

**Investors who have invested at least 12 months before the date of the listing application, each holding such amount of shares or securities convertible into shares equivalent to 5% or more of the issued share capital of the listing applicant as at the date of listing application and throughout the pre-application 12-month period?**

Yes

**Please give reasons for your views.**

We generally agree with the Exchange's rationale for the proposal. Given the stated rationale for requiring a Chapter 18C listing applicant to demonstrate meaningful investment from Pathfinder SII's (i.e. to help ensure that the listing applicant has been subject to extensive due diligence checks, prior to listing, by investors who have taken on significant investment risk), an investor who would otherwise qualify as a Pathfinder SII should not be disqualified solely by virtue of a drop of its shareholding (on an as-converted basis) to below 5% for a short period of time within the pre-application 12-month period as a result of dilution, provided that: (a) its shareholding is 5% or above as at the date of listing application; and (b) its daily / monthly average shareholding throughout the pre-application 12-month period is 5% or above.

#### **Question 22**

**Do you agree that as an indicative benchmark for meaningful investment, the aggregate investment from all Sophisticated Independent Investors should result in them holding such amount of shares or securities convertible into shares equivalent to at least such percentage of the issued share capital of the applicant at the time of listing as set out in Table 4 and paragraph 168 of the Consultation Paper?**

Yes

**Please give reasons for your views.**

We generally agree with the Exchange's rationale for the proposal. We note that the Exchange proposes to count offer shares issued to Sophisticated Independent Investors in the IPO towards the minimum aggregate investment requirement under paragraph 167(b) of the Consultation Paper. Further clarity on whether, in a scenario where the pre-IPO and cornerstone investments from Sophisticated Independent Investors are insufficient to satisfy such requirement, the Exchange would be prepared to allow a Chapter 18C listing applicant to proceed to listing on the basis of undertakings by the listing applicant, the overall coordinator and/or the sponsor to ensure that sufficient offer shares would be allocated to Sophisticated Independent Investors participating as placees under the placing tranche to satisfy the minimum aggregate investment requirement, would be helpful.

The Exchange may also consider clarifying that the issued share capital at the time of listing does not include shares issued pursuant to any over-allotment option.

**Question 23**

**Do you agree that a Pre-Commercial Company applicant must have as its primary reason for listing the raising of funds for the R&D of, and the manufacturing and/or sales and marketing of, its Specialist Technology Product(s) to bring them to commercialisation and achieving the Commercialisation Revenue Threshold?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 24**

**Do you agree that a Pre-Commercial Company applicant must demonstrate to the Exchange, and disclose in its Listing Document, a credible path to the commercialisation of its Specialist Technology Products, appropriate to the relevant Specialist Technology Industry, that will result in it achieving the Commercialisation Revenue Threshold?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 25**

**Do you agree with the examples proposed in paragraphs 176 to 179 (including the definition of "highly reputable customer") of the Consultation Paper that a Pre-Commercial Company applicant could use to demonstrate a credible path to achieving the Commercialisation Revenue Threshold?**

Yes

**Please give reasons for your views.**

We generally agree with the Exchange's rationale for the proposal. Further guidance on how the Exchange would assess the credibility of the path to commercialisation of listing applicants the Specialist Technology Product(s) of which are proposed to be sold directly to end customers and which therefore may not enter into contracts or framework agreements, would be helpful.

**Question 26(a)**

**Do you agree that a Pre-Commercial Company applicant must explain and disclose, in detail, the timeframe for, and impediments to, achieving the Commercialisation Revenue Threshold?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 26(b)**

**Do you agree that a Pre-Commercial Company applicant must, if its working capital (after taking into account the listing proceeds) is insufficient to meet its needs before it achieves the Commercialisation Revenue Threshold, describe the potential funding gap and how it plans to further finance its path to achieving the Commercialisation Revenue Threshold after listing?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 27**

**Do you agree that a Pre-Commercial Company applicant must have available working capital to cover at least 125% of its group's costs for at least the next 12 months (after taking into account the IPO proceeds of the applicant), and these costs must substantially consist of the following: (a) general, administrative and operating costs; and (b) R&D costs?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal. Note 1 to draft Rule 18C.06 sets out the Exchange's expectation that an issuer listed under Chapter 18C would use a substantive portion of the IPO proceeds to cover the group's: (a) general, administrative and operating costs (including any production costs); and (b) R&D costs. Further clarity and quantitative guidance on what is meant by "substantive" and the proportion that would satisfy this requirement would be helpful.

**Question 28**

**Do you agree that Independent Institutional Investors should be given a minimum allocation of offer shares in the IPO of Specialist Technology Companies to help ensure a robust price discovery process?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 29**

**Do you agree with the definition of Independent Institutional Investors as set out in**

**paragraphs 201 to 202 of the Consultation Paper?**

Yes

**Please give reasons for your views. Please provide any alternative definition you believe appropriate with reasons for your suggestions.**

We agree with the Exchange's rationale for the proposal.

**Question 30**

**Do you agree that a Specialist Technology Company must, in addition to meeting the existing requirements on public float, ensure that at least 50% of the total number of shares offered in the initial public offering (excluding any shares to be issued pursuant to the exercise of any over-allotment option) must be taken up by Independent Institutional Investors?**

**Please give reasons for your views.**

We acknowledge the Exchange's rationale for the proposal. We would urge the Exchange to further consider feedback from market participants and stakeholders with a view to striking the right balance between ensuring a robust price discovery process, and not unduly restricting participation in the IPO by other investors such as existing or connected shareholders and individual professional investors.

**Question 31**

**Do you agree that in the case where a Specialist Technology Company is listed by way of a De-SPAC Transaction, at least 50% of the total number of shares issued by the Successor Company as part of the De-SPAC Transaction (excluding any shares issued to the existing shareholders of the De-SPAC Target as consideration for acquiring the De-SPAC Target) must be taken up by Independent Institutional Investors?**

**Please give reasons for your views.**

Please refer to our response to Question 30.

**Question 32**

**Do you agree that in the case of a Specialist Technology Company seeking to list by introduction, the Exchange will consider granting waivers, on a case-by-case basis, from the requirement for the minimum allocation of offer shares to Independent Institutional Investors, if the applicant is able to demonstrate that it is expected to meet the applicable minimum market capitalisation at the time of listing (see paragraph 120 of the Consultation Paper), having regard to its historical trading price (for at least a six-month period) on a Recognised Stock Exchange with sufficient liquidity and a large investor**

**base (a substantial portion of which are independent Institutional Professional Investors)?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 33**

**Do you agree that there should be a new initial retail allocation and clawback mechanism for Specialist Technology Companies to help ensure a robust price discovery process?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 34**

**Do you agree with the proposed initial allocation and clawback mechanism for Specialist Technology Companies as set out in paragraph 205 of the Consultation Paper?**

**Please give reasons for your views. If your answer is "No", please provide alternative suggestions and provide reasons for your suggestions.**

We acknowledge the Exchange's rationale for the proposal. We would urge the Exchange to further consider feedback from market participants and stakeholders with a view to striking the right balance between ensuring a robust price discovery process and a sufficient supply of securities to satisfy retail investor demand.

**Question 35**

**Do you agree that a Specialist Technology Company seeking an initial listing must ensure that a portion of its issued shares with a market capitalisation of at least HK\$600 million is free from any disposal restrictions (whether under: contract; the Listing Rules; applicable laws; or otherwise) upon listing (referred to as its "free float")?**

**Please give reasons for your views.**

We acknowledge the Exchange's rationale for the proposal. In respect of the meaning of "disposal restrictions", a listing applicant should not be expected to carry out due diligence on every subscriber to ascertain whether or not it is subject to disposal restrictions under, for example, its internal policies or contractual instruments (other than contractual instruments to

which the listing applicant or any of its subsidiaries is a party). The Exchange should consider whether disposal restrictions, for this purpose, should be limited to disposal restrictions under: (a) the Listing Rules; (b) applicable Hong Kong law and regulation; and (c) instruments to which the listing applicant or any of its subsidiaries is party.

**Question 36**

**Do you agree that the Exchange should reserve the right not to approve the listing of a Specialist Technology Company if it believes the company's offer size is not significant enough to facilitate post-listing liquidity, or may otherwise give rise to orderly market concerns?**

Yes

**Please give reasons for your views.**

We generally agree with the Exchange's rationale for the proposal. Quantitative guidance from the Exchange on the size of an offer that would normally be regarded as significant enough to facilitate post-listing liquidity would be helpful.

**Question 37**

**Do you agree that a Specialist Technology Company applicant's Listing Document must include the additional information set out in paragraph 32 of the Draft Guidance Letter (Appendix V of the Consultation Paper) due to it being a Specialist Technology Company?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 38**

**Do you have any other suggestions for additional information that a Specialist Technology Company should include in its Listing Document in order to allow an investor to properly assess and value the company?**

No

**If so, please provide your suggestion.**

We agree with the Exchange's proposal.

**Question 39**

**Do you agree that existing shareholders should be allowed to participate in the IPO of a Specialist Technology Company provided that the company complies with the existing public float requirement under Rule 8.08(1), the requirement for minimum allocation to Independent Institutional Investors (see paragraph 200 of the Consultation Paper) and**

**the minimum free float requirement (see paragraph 207 of the Consultation Paper)?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 40**

**Do you agree with the proposals set out in paragraph 225 of the Consultation Paper regarding the conditions for existing shareholders subscribing for shares in an IPO?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 41(a)**

**Do you agree that the controlling shareholders of a Commercial Company should be subject to a lock-up period of 12 months?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 41(b)**

**Do you agree that the controlling shareholders of a Pre-Commercial Company should be subject to a lock-up period of 24 months?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 42**

**Do you agree with the scope of key persons (as described in paragraph 242 of the Consultation Paper) that should be subject to a restriction on the disposal of their holdings after listing?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 43(a)**

**Do you agree with the proposed lock-up periods on the securities of such key persons and their close associates of 12 months for a Commercial Company?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 43(b)**

**Do you agree with the proposed lock-up periods on the securities of such key persons and their close associates of 24 months for a Pre-Commercial Company?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 44(a)**

**Do you agree with the proposed lock-up period on the securities of Pathfinder SII's of six months for a Commercial Company?**

Yes

**Please give reasons for your views.**

We generally agree with the Exchange's rationale for the proposal. However, we note that: (a) the lock-up would apply to all Pathfinder SII's; and (b) an investor would automatically qualify as a Pathfinder SII if: (i) it is a sophisticated independent investor ("SII"); (ii) its investment is made at least 12 months before the date of the listing application; and (iii) it holds shares or securities convertible into shares equivalent to 5% or more of the issued share capital of the listing applicant as at the date of its listing application and throughout the pre-application 12-month period.

In a scenario where a listing applicant has more than two Pathfinder SII's and only need to rely upon two of them to satisfy the meaningful investment requirement, the other "non-essential" Pathfinder SII's (who would nonetheless be subject to the lock-up) are effectively "penalised" for holding 5% or more of the issued share capital and for making the investment 12 months before the date of the listing application, when compared to SII's who hold a <5% investment or who make their investments less than 12 months before the date of the listing application (who would not be subject to the lock-up). The application of the lock-up to all Pathfinder SII's would therefore serve as a disincentive for SII's to make 5%+ investments in Specialist Technology

Companies at an early stage, and would make it more difficult for such companies to attract early investment from SIIIs.

**Question 44(b)**

**Do you agree with the proposed lock-up period on the securities of Pathfinders SIIIs of 12 months for a Pre-Commercial Company?**

Yes

**Please give reasons for your views.**

We generally agree with the Exchange's rationale for the proposal. Please also refer to our response to Question 44(a).

**Question 45**

**Do you agree that controlling shareholders, key persons and Pathfinder SIIIs should be permitted (in accordance with current Rules and guidance) to sell their securities prior to an IPO and offer them for sale in the IPO, such that only the securities retained by them after listing would be subject to the lock-up restrictions?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 46**

**Do you agree that any deemed disposal of securities by a person resulting from the allotment, grant or issue of new securities by a Specialist Technology Company during a lock-up period would not constitute a breach of the lock-up requirements?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 47**

**Do you agree that a lock-up period in force at the time of the removal of designation as a Pre-Commercial Company should continue to apply unchanged?**

No

**Please give reasons for your views.**

While we acknowledge the Exchange's rationale for the proposal, to be consistent with the treatment of the other requirements specific to Pre-Commercial Companies, the Exchange

should consider whether the lock-up requirement should also be adjusted upon the removal of designation as a Pre-Commercial Company. We believe the Exchange's concern that the public would have placed reliance upon the lock-ups when investing in the company can be addressed by requiring appropriate disclosures to be made in the listing document. A possible formulation would be to provide that the relevant lock-up period would end on the later of: (a) the date on which such lock-up period would end had the listing applicant applied for listing as a Commercial Company; and (b) the date falling a fixed period of time (e.g. 30 days) after the removal of designation as a Pre-Commercial Company.

**Question 48**

**Do you agree that a Specialist Technology Company must disclose in its Listing Document the total number of securities in the issuer held by the persons (as identified in the Listing Document) that are subject to the lock-up requirements under the Listing Rules, and that the same information must also be disclosed in the interim and annual reports of the Specialist Technology Company for so long as such persons remain as a shareholder?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 49**

**Do you agree with the scope of the additional disclosure in the interim and annual reports of Pre-Commercial Companies as set out in paragraphs 262 and 263 of the Consultation Paper?**

Yes

**Please give reasons for your views. If your answer is "No", please provide alternative suggestions and provide reasons for your suggestions.**

We agree with the Exchange's rationale for the proposal. We note that "updates on the amount of contract value realised and/or realisable in respect of the agreements with customers" is proposed to be a disclosure requirement under draft Rule 18C.18 (2). As discussed in our response to Question 25, customer contracts may not be relevant in all cases and may not have been previously disclosed in the listing document.

**Question 50**

**Do you agree that only Pre-Commercial Companies should be subject to the ongoing disclosure requirements referred to in Question 49?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 51**

**Do you agree that Pre-Commercial Companies should be subject to a remedial period of 12 months to re-comply with the sufficiency of operations and assets requirement before delisting, in the event that the Exchange considers that a Pre-Commercial Company has failed to meet its continuing obligation to maintain sufficient operations or assets?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 52**

**Do you agree that Pre-Commercial Companies must not effect any transaction that would result in a fundamental change to their principal business without the prior consent of the Exchange?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 53**

**Do you agree that Pre-Commercial Companies must be prominently identified through a "PC" marker at the end of their stock names?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 54**

**Do you agree that the continuing obligations for Pre-Commercial Companies no longer apply once a Pre-Commercial Company has met the requirements in paragraph 270 of the Consultation Paper and ceases to be regarded as a Pre-Commercial Company?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal.

**Question 55**

**Do you agree with the proposed requirements for Pre-Commercial Companies to demonstrate to the Exchange that they should no longer be regarded as a Pre-Commercial Company (see paragraphs 269 to 272 of the Consultation Paper)?**

Yes

**Please give reasons for your views.**

We agree with the Exchange's rationale for the proposal. Please also refer to our response to Question 11.