

**Submitted via Qualtrics**

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**Personal**

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**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.**

Yes. The definitions of those concepts have clearly stated what “Specialist Technology” is. Based on companies, products and industries. By those exact definitions, a lot of companies with high growth potential will have opportunities to list.

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with the list of Specialist Technology Industries and the respective acceptable sectors set out in paragraph 4 of the Draft Guidance Letter (Appendix V to the Consultation Paper)?**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

Yes. The definitions of those concepts have clearly stated what “Specialist Technology” is. Based on companies, products and industries. By those exact definitions, a lot of companies with high growth potential will have opportunities to list.

For the respective acceptable sectors set out in paragraph 4 of the Draft Guidance Letter (Appendix V to the Consultation Paper), yes. It is reasonable to keep this non-exhaustive and keep updated from time to time.

**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.**

Those factors strictly limit the background, and the use of the proceeds are highly related to their specialist technology segments. This could be easier for the 18C to help who really need help.

**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.**

The Exchange leave flexibility so that newly emerging industries and the latest technology trends can be quickly incorporated into the scope of the Specialist Technology Regime. But also, it has principles to keep the flexibility safe enough. If an application displays attributes inconsistent with the principles.

**Question 5**

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

Yes

**Please give reasons for your views.**

Those two kinds of companies both have difficulty for the main board test

**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.**

Keeping the market safe is the Exchange's duty. The pre-commercial companies have more risk than the commercial companies. Both from the products and the financial performance.

**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.**

Yes. It is a fair decision to keep same with 18A

**Question 8**

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

Yes

**Please give reasons for your views.**

Yes. By statistics provided in the files, 32 times P/S ratio firstly shows that it is a specialist technology company. Secondly, most companies have more than 32x ratio capitalisation at their time of listing.

**Question 9**

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

Yes

**Please give reasons for your views.**

Compared with the commercial companies, pre-commercial companies have more potential. So it is reasonable to have a higher expected market capitalisation

**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.**

a revenue threshold of HK\$250 million would reflect meaningful commercialisation to investors. We agree that this threshold would be sufficient to identify Commercial Companies that have genuinely commercialised their Specialist Technology Products and ensure that Pre-Commercial Companies are subject to more stringent requirements. The proposed threshold is also close to the revenue thresholds of RMB200 million to RMB300 million imposed by the STAR Market.

**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.**

The revenue only arises from the applicant's Specialist Technology business segment should prove that the companies do commercialize their Specialist Technology product.

**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.**

Firstly, although the market has uncertainty. A commercial company should demonstrate the growth of revenue as possible as they can. To make the market feel confident to them.

**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.**

**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?**

Yes

**Please give reasons for your views.**

Continuous R&D investment is an indispensable element to support its growth.

**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.**

The numbers are based on the Exchange's analysis of issuers in the Sample Cohort and prospective listing applicants.

**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.**

The numbers are based on the Exchange's analysis of issuers in the Sample Cohort and prospective listing applicants.

**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.**

This method clearly classifies the R&D investment and the total operating expenditures.

**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?**

Yes

**Please give reasons for your views.**

This requirement is consistent with our existing Main Board Eligibility Tests<sup>46</sup>. Based on the Exchange's analysis on the issuers in the Sample Cohort, it does not foresee Specialist Technology Company applicants having any major difficulty meeting this requirement.

**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.**

This requirement is consistent with the approach for our Biotech Company listing regime. The stableness of ownership helps the company more Convincing

**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.**

Firstly, this could prove that the applicant's products or R&D is reasonable. Secondly, being approved by Sophisticated Independent Investors shows positive signals to the market.

**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.**

The key term to define the Sophisticated Independent Investors is that the Sophisticated Independent Investors cannot be a core connector to the applicant (excluding sustainable shareholder condition).

**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?**

Yes

**Please give reasons for your views.**

The definition explains what sophisticated investor is in full scale.

**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.**

It is important to identify if it is reasonable for the Exchange to approve the application, by the experience and track record of the Sophisticated Independent Investors.

### **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.**

The percentages define in table 4 show reasonableness. Because compared to commercial companies, the pre-commercial companies have more risk due to its lack of commercialisation. More percentage in pre-commercial companies helps the market to the applicant.

### **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.**

The pre-commercial company always have financial difficulties. They have to keep R&D without commercialisation products. So it is reasonable for them to keep it as their primary reason. And after listing, the proceeds should be used for R&D and the manufacturing and/or sales and marketing of, its Specialist Technology Product(s).

### **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.**

For investors, it is a great huge risk if there is no credible path of commercialisation. This requirement helps to decrease this risk. And for the market, it is significant for companies to clarify their path to meet the requirement.

**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.**

A credible path by binding contracts or non-binding framework agreements helps independent customers to understand their timetable and milestones for their incoming commercialisation products.

**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.**

Explaining and disclosing the timeframe and impediments in detail is necessary movement of risk disclosure in the listing. And that helps the companies to achieve their commercialisation revenue threshold;

**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.**

Yes. Explaining and disclosing the timeframe and impediments in detail is necessary movement of risk disclosure in the listing. And that helps the companies to achieve their commercialisation revenue threshold;

**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.**

Yes. Sufficient capital reserve is quite important for a pre-commercial company applicant to stay against the risks derive from market, industry, products and so on.

**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.**

as examples set up in recent listed 18A companies, the existence of independent institutional investors could better understand the market and have stronger risk tolerance against individual investors. Such allocation of certain portion shares of a Specialist Technology Companies could relatively stabilize the share price during the first a few months after listing and avoid the unnecessary market turbulence due to short term incident.

**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.**

Agree with the definition, which has clearly differentiate Independent Institutional Investors with other professional investors.

**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?**

Yes

**Please give reasons for your views.**

From previous understanding of some mature market such as Nasdaq, institutional investors should eventually take up approximately 80% of total shares outstanding. from this aspect, 50% seems rational.

**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?**

Yes

**Please give reasons for your views.**

as stated above, plus the De-SPAC transaction should better fully due diligenced, since such method of listing make the companies exposed to more risks.

**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.**

Agree, listing by introduction is mainly used for companies, which as listed in another major stock market. In such case, its previous investors, along with individual and institutional investors should have agreed a fair share price of such companies, in such case, a robust price discovery process has already been taken, and other investors could take reference to such companies' previous trading history and analysis based on sufficient public information

**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?**

No

**Please give reasons for your views.**

clawback mechanism set up for main board HKIPO and 18A has been relatively mature and proven by the market to deal with over demand or other circumstances.

**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.**

**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")?**

Yes

**Please give reasons for your views.**

one concern of HK stock market is lack of liquidity, such 600 million HKD free float could relatively mitigate such problem.

**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.**

from previous cases, we have found that in some case, the listed company has a relatively large market cap, however only to issue a very small percentage of shares, such as single digit. the purpose of such listing may only fulfill its previous signed QIPO terms and let primary market investors to exit, but may cause a bad influence to public investors afterwards.

**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.**

many 18C companies are pre-money companies. such targets share several features such as frequent financing history, high R&D cost etc. which requires more detailed information disclosed to public investors who have no resources to do a full due diligence. Pre-money companies, especially those in AI or software business with 2B business model, have relatively high liquidity risk, and more disclosure would help public investors get a full picture.

**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.**

suggest to include the estimation of breakeven point. those companies with negative income should disclose their reasonable estimation of when the company could breakeven, or at least a positive operating cash flow. in addition, also disclose the major criteria or assumption to achieve such circumstance.

**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.**

the participation of existing shareholders shows a strong confidence in the listing company, since the existing shareholders should understand and know the company much better than others. and such action should pass a positive effect to public.

**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.**

the proposals in 225 should be enough to achieve the fairness between the existing shareholders and other cornerstone investors. no priority should be given to any parties.

**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.**

Agree, a pre-commercial company needs more time to facilitate its business model and develop into a relatively mature status. The longer lock-up period for the controlling shareholders keep the company relatively stable and avoid the share price turbulence caused by selling from these investors. If take reference to Chinese stock market, which is more strict, shareholders owns over 5% usually been locked for 3 years.

**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.**

Agree, a pre-commercial company needs more time to facilitate its business model and develop into a relatively mature status. The longer lock-up period for the controlling shareholders keep the company relatively stable and avoid the share price turbulence caused by selling from these investors. If take reference to Chinese stock market, which is more strict, shareholders owns over 5% usually been locked for 3 years.

**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.**

cause these key persons are relatively close to the core business and inside information of the listing company. The disposal of these person should be carefully and make sure no advantages have been taken.

**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.**

as key persons may have strong influence on these “close associates”, which may act in concert eventually. As such, they should be put in same restrictions.

**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.**

Agree, as key persons may have strong influence on these “close associates”, which may act in concert eventually. As such, they should be put in same restrictions.

**Question 44(a)**

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

Yes

**Please give reasons for your views.**

Agree, Pathfinders SIIIs has already been with the listed company for a period of time and some

of them are NOT strategist investors. In such case, their lock-up period should shorter than controlling shareholders.

**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.**

Agree, Pathfinders SIIIs has already been with the listed company for a period of time and some of them are NOT strategist investors. In such case, their lock-up period should shorter than controlling shareholders.

**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?**

No

**Please give reasons for your views.**

Selling prior to an IPO should be reasonable as it is mainly defined by primary market, as long as it obey the other listing rules. However, selling in the IPO seems weird, since it causes the motivation for the existing investors to sell some portion of their shares for safety reason, and may push the companies to issue at a higher price, which may unfair for public investors come in afterwards.

**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?**

No

**Please give reasons for your views.**

It should be defined as a breach of the lock-up requirement, since such shares issued during the lock-up period, such as through allotment, should also share lock-up features, in order to avoid short-term frequent trading problem. Also if such shares are exempt from lock-up period, it provide a leakage for key persons to exit.

**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?**

Yes

**Please give reasons for your views.**

Yes, if a pre-commercial company developed well and successfully commercialized, it still needs time to increase scale, hiring people, etc. in such case its good for keep the lock-up period. From own experience, it may needs several years to grow a fully mature business model. Also keep the lock-up period unchanged, could avoid the incentive for the company managers to achieve only short time goal and only commercial for short period with no sustainability plan.

**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.**

these people may cause serious share price fluctuation especially for Specialist Technology Company. The disclosure of such information in listing documents and regular reports, could give public investors a better full picture and judgement of the company.

**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.**

paragraphs 262 and 263 have included some key features to analysis a tech companies such as R&D details etc. however, the public investors may also focus on the profitability. In paragraph 262, it says “a prominently disclosed warning that the company may not achieve the Commercialisation Revenue Threshold.” Suggest also to disclose the plan or main benchmark of how to achieve this Commercialisation Revenue Threshold.

**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.**

No Commercial companies should be subject to the requirement also. As these tech companies downstream market, especially 2B downstream market, still in the process of accept the new technologies and the how industry environment has not been fully stabilized, as such the investors should obtain its R&D detail in order to judge the risks if the whole market is going through a recession, especially during recent times.

**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.**

Agree, current business environment has been difficult for tech companies who suffers from high burn rate and stable downstream demand. Some of these companies has build up relative strong technology and market understating barriers. If a remedial period is given, it has a better chance to survive and commercialize its technology.

**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.**

Yes, as previous stated, in most cases a new technology needs time to polish. And even the technology is ready, the market needs time to accept. In such case the fundamental change in principal business may means the failure of previous technology usage, which may cause huge concern for public investors.

**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.**

because such stocks expose to more uncertainties and such more risks. The public investors should knowledge it at first place.

**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?**

No

**Please give reasons for your views.**

the pre-commercial companies' obligation should still sustain, as stated above. Such companies may meet the requirement in short time but needs longer time to develop a fully mature business model. From such aspect the disclosure is helpful for investors to get full picture.

**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.**

Agree with most of the process and requirement, but also suggest to disclose the confirmation from major independent directors, as a supportive documents to show the fairness and objectiveness.