

Dear Sirs,

**Re: Consultation Paper on Proposed enhancements to the Exchange's
Decision-Making and Governance Structure for Listing Regulation**

I refer to the Consultation Paper on the proposed changes to the Decision-Making and Governance Structure for Listing Regulation of the Stock Exchange of Hong Kong Limited (the "Exchange").

The proposed structures of Listing Policy Committee ("LPC") and Listing Regulatory Committee ("LRC") have failed to take into account the fundamental principles of separation of powers and check-and-balance. Under the proposed structures, the authority to make final decisions on IPO applications or Listing Rules or Policies will be concentrated under the hand of a few persons. Although the Listing Committee ("LC") will be invited to give opinions to matters considered by LPC, its views are non-binding. LC comprises a group of 28 market practitioners with diverse expertise, experience and market perspectives. As there are no clear definitions of novelty or suitability for listing, it is very likely that the Listing Department will incline to transfer all cases to LRC and accordingly LC will be sidelined. I think it is unwise to substitute the well operated platform of LC for the two new committees that have no check-and-balance at all.

In view of the above, I recommend the SFC and the Stock Exchange to withdraw the proposal. Thank you for your kind attention.

Yours faithfully,