

Exposure Paper: Abolition of Requirement for Main Board Issuers to Publish Paid Announcements in Newspapers and Related Matters (the "Exposure Paper")

Please find set out below our comments on the matters raised for consultation in the Exposure Paper.

1. Do you consider that the short-form announcement which, as an interim measure, Main Board issuers will be required to publish in the newspapers, should be a summary announcement or a notification?

We consider that the short form announcement should simply notify investors of the publication of the full announcement on the websites of the Exchange and the issuer. We believe that notifications are more likely to accustom investors to consulting these websites for announcements and will thus facilitate a smoother transition to total abolition of paid announcements. In addition, as noted in the Exposure Paper, a notification will avoid the risk of incomplete or misleading information being included in a summary announcement.

2. Do you support the proposed implementation timetable?

We agree with the proposal that issuers should be given time to prepare for the new requirements and therefore that the transitional phase requiring publication in the newspaper of a short form announcement only should start 6 months after the announcement of the finalised Rules to the market. The transitional phase should not however start any later than 6 months after such announcement. We also agree with 9 months as the proposed duration of the transitional phase.

The Law Society of Hong Kong Securities Law Committee 11 January 2006 93520