

Submitted via Qualtrics

Hong Kong Sponsor Principal Association Limited

Company/Organisation view

Professional Body / Industry Association

Question 1.1(a)

Do you agree with our proposal to exclude securities that do not contribute to an open market in trading in Hong Kong from the calculation of the public float by requiring the public float percentage of securities new to listing be calculated normally by reference to the total number of securities of that class only (as set out in paragraph 44 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Question 1.1(b)

Do you agree with our proposal to exclude securities that do not contribute to an open market in trading in Hong Kong from the calculation of the public float by in the case of a PRC issuer with no other listed shares, requiring the numerator of its public float percentage to be calculated by reference to its H shares only, such that any shares it has in issue that are in the class to which H shares belong would only be included in the denominator (as set out in paragraph 45 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Question 1.1(c)

Do you agree with our proposal to exclude securities that do not contribute to an open market in trading in Hong Kong from the calculation of the public float by in the case of a PRC issuer with other listed shares (e.g. A shares listed on a PRC stock exchange), requiring

the numerator of its public float percentage to be calculated by reference to its H shares only, such that any other listed shares it has in issue would only be included in the denominator (as set out in paragraph 45 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Question 1.1(d)

Do you agree with our proposal to exclude securities that do not contribute to an open market in trading in Hong Kong from the calculation of the public float by in the case of an issuer with other share class(es) listed overseas, requiring the numerator of its public float percentage at listing to be calculated by reference to only the shares of the class for which listing is sought in Hong Kong, such that any shares of other classes it has in issue would only be included in the denominator (as set out in paragraph 46 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Question 1.2

Do you agree with our proposal to modify the requirement of MB Rule 8.09(1) (GEM Rule 11.23(2)(a)) to clarify that the minimum market value in public hands requirement applies to the securities for which listing is sought (as set out in paragraph 47 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Question 2.1

Do you agree that we should exclude from the definition of “the public” any person whose acquisition of securities has been financed by the

issuer and any person who is accustomed to take instructions from the issuer (as set out in paragraph 64 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Question 2.2

Do you agree with our proposal to regard shares held by an independent trustee which are granted to independent scheme participants and unvested as shares held in public hands (as set out in paragraph 65 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Question 3.1

Do you agree that we should replace the current minimum initial public float thresholds with tiered initial public float thresholds according to the expected market value of the class of securities for which listing is sought on the Exchange at the time of listing?

No

Please give reasons for your views and any alternative suggestions.

We endorse the Consultation Paper's direction to align Hong Kong's initial public float thresholds with international standards, such as those of the Singapore Exchange (SGX) and London Stock Exchange (LSE), as a means to bolster competitiveness. However, we have reservations about the proposal to lower the initial public float to 5% for issuers with market capitalizations exceeding HKD 70 billion. This could disproportionately reduce market liquidity and diminish Hong Kong's appeal to large-scale issuers. For comparison, SGX requires a minimum of 12% for issuers with market caps above SGD 1 billion, and LSE mandates 10%, suggesting that a 5% threshold may fall short of supporting an active trading market.

Instead, we propose setting the initial public float lower limit at 10%, coupled with a higher minimum market capitalization requirement, such as HKD 7 billion calculated at the 10% threshold. This approach provides issuers with

reasonable flexibility while ensuring market stability and liquidity, addressing concerns about reduced trading volume and impaired price discovery efficiency in large IPOs. For issuers with exceptionally high market caps, a 10% float still guarantees sufficient value in public hands, preserving market attractiveness in line with the objective of facilitating an open market as stated in paragraph 36 of the Consultation Paper.

Question 3.2

Do you agree with the proposed tiered initial public float thresholds (as set out in Table 5 of the Consultation Paper)?

Please give reasons for your views and any alternative suggestions.

Question 3.3(a)

Do you agree that the proposed tiered initial public float thresholds should be applied to any class of equity securities new to listing on the Exchange, except for the initial listing of A+H issuers (and other prescribed types of issuers)?

Please give reasons for your views and any alternative suggestions.

Question 3.3(b)

Do you agree that the proposed tiered initial public float thresholds should be applied to any class of equity securities new to listing on the Exchange, except for a bonus issue of a new class of securities (as set out in paragraph 79 of the Consultation Paper)?

Please give reasons for your views and any alternative suggestions.

Question 3.4

Do you agree that all issuers disclose, in their listing documents, the initial public float threshold that is applicable to the class of securities they seek to list on the Exchange?

Please give reasons for your views and any alternative suggestions.

Question 3.5

Do you agree that the same tiered initial public float thresholds (as set out in Table 5 of the Consultation Paper) should be applied to GEM issuers?

Please give reasons for your views and any alternative suggestions.

Question 4.1(a)

If our proposed initial public float thresholds (see proposals in Section I.B.1 and Section I.D.1 of Chapter 1 of the Consultation Paper) are supported by the market, we seek views on the appropriate ongoing public float requirements for issuers, subject to the initial public float tiers proposed (see Table 5 in Section I.B.1 of Chapter 1 of the Consultation Paper). Please give reasons for your views and any alternative suggestions.

We recommend an ongoing public float requirement of 10% of total issued shares, with a minimum market value of HK\$100 million (Main Board) and HK\$30 million (GEM), supplemented by a 6-month grace period and enhanced disclosure. This approach provides flexibility for issuers, aligns with international benchmarks and ensures liquidity and market integrity, supporting HKEX's goal of enhancing listing competitiveness while protecting investors. The OTC market concept further strengthens this framework by offering a fallback for non-compliant issuers.

Question 4.1(b)

If our proposed initial public float thresholds (see proposals in Section I.B.1 and Section I.D.1 of Chapter 1 of the Consultation Paper) are

supported by the market, we seek views on the appropriate ongoing public float requirements for: A+H issuers and other prescribed types of issuers (see Section I.D.1 of Chapter 1 of the Consultation Paper). Please give reasons for your views and any alternative suggestions.

We propose an ongoing public float requirement of 10% of H shares (or the listed class) for A+H issuers and other prescribed types, coupled with a minimum market value of HK\$100 million for Main Board issuers and HK\$30 million for GEM issuers. This framework ensures liquidity and market integrity in Hong Kong, aligns with international practices, and accommodates the dual-listing nature of these issuers. Supporting measures like a grace period and enhanced disclosure further strengthen the proposal, while tiered requirements or shareholder spread rules offer viable alternatives if additional granularity is desired.

Question 4.2

Should issuers be allowed the flexibility to maintain a lower public float level, after listing, than that required at listing, in view of the issues we have described in the Consultation Paper (see paragraphs 102 to 109 of the Consultation Paper)?

Yes

Please give reasons for your views.

We support introducing flexibility in ongoing public float requirements post-listing to address challenges noted in the Consultation Paper, such as issuers facing constraints from corporate actions (e.g., share repurchases) or third-party acquisitions reducing public float. However, we recommend a phased approach to lowering the threshold from 25% to 15%, such as a gradual reduction over three years (e.g., 3-4% annually), to minimize abrupt market impacts and ensure stability during the transition. This staged method offers issuers adaptability while mitigating potential disruptions to liquidity and stability, reducing the risk of market manipulation highlighted in paragraph 35 of the Consultation Paper.

Question 4.3

Should the existing regulatory approach of suspending trading of issuers with public float below a prescribed level (see paragraph 92(c) of the Consultation Paper) be maintained, in view of the issues we have described in the Consultation Paper (see paragraphs 110 to 111 of the Consultation Paper)?

Yes

Please give reasons for your views.

The existing regulatory approach of suspending trading when an issuer's public float falls below the prescribed level should be maintained, as it plays an essential role in protecting market integrity and investor confidence. However, to address the liquidity deprivation and fairness issues raised in paragraphs 110 and 111 of the consultation paper, HKEX should adopt enhancements such as a 6-month grace period, an OTC market for continued trading, and stricter disclosure requirements. These changes would create a more balanced framework, ensuring market protection without unduly harming issuers or investors.

Question 4.4

Do you agree that ongoing public float requirements should be applied to shares only (as set out in paragraph 118 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Ongoing public float requirements should apply to shares only. Shares drive ownership, voting rights, and market dynamics, making them the appropriate focus for these rules. Applying them to other securities like debt, derivatives, or structured products would be inefficient and misaligned with their purpose, adding unnecessary burdens while offering minimal benefits. This approach ensures market integrity and investor protection where it matters most.

Question 4.5

Do you agree that an OTC market should be established in Hong Kong (as set out in paragraph 119 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

We strongly endorse establishing an OTC market in Hong Kong, particularly for issuers delisted due to insufficient public float or other regulatory issues. This would offer investors flexible exit options, enhance market inclusiveness, and align with the goal of enhancing Hong Kong's appeal as outlined in Table 1, paragraph 30 of the Consultation Paper. An OTC market could serve as a trading platform for suspended shares, boosting liquidity and safeguarding investor interests.

To ensure operational efficacy, we suggest adopting a tiered system inspired by the OTC Markets Group in the U.S., notably the OTCQX and OTCQB tiers, which provide structured levels of transparency and regulatory compliance for clear investor guidance. Retail investors should be permitted to participate, subject to stringent eligibility criteria, accompanied by risk warnings and suitability assessments to ensure awareness of risks tied to delisted companies. Allowing issuers to repurchase shares at fair market value in the OTC market would further enhance liquidity for existing shareholders.

On regulation, we advocate a framework balancing transparency and flexibility, mandating basic disclosures (e.g., financial statements) while avoiding excessive compliance costs that could deter participation. To further protect retail investors, we propose safeguards such as mandatory disclosure of material events and regular performance updates.

Question 4.6(a)

What are your views on the potential benefits and risks of establishing an OTC market? Please give reasons for your views.

Establishing an OTC market in Hong Kong could bring significant benefits, such as improved liquidity for suspended or delisted shares and support for issuers in remediation, while also fostering market flexibility. However, it poses risks like weaker investor protection, market fragmentation, and potential reputational damage to HKEX. With a well-designed regulatory approach as suggested in our reply to Question 4.5 and robust investor education, HKEX could leverage the strengths of an OTC market while mitigating its drawbacks, ultimately strengthening Hong Kong's capital market ecosystem.

Question 4.6(b)

What are your views on functions that an OTC market should serve? Please give reasons for your views.

An OTC market should primarily provide a trading platform for suspended or delisted shares, facilitate issuer remediation, and support smaller or niche companies. Additionally, it should emphasize investor education, offer tiered compliance options, and integrate with the main exchange. These functions address liquidity and compliance challenges and promote inclusivity, ultimately enhancing the resilience and attractiveness of the capital market ecosystem.

Question 4.6(c)

What are your views on whether such OTC market should be open to retail investors? Please give reasons for your views.

In our view, the OTC market should be open to retail investors, but with strong safeguards like risk disclosures, investor education, and possibly a tiered access system. This approach ensures inclusivity, giving retail investors a fair chance to participate, while protecting them from the heightened risks associated with OTC trading. By striking this balance, the market can maintain both integrity and accessibility.

Question 5.1

Do you agree with our proposal to mandate disclosure of actual public float in listed issuers' annual reports?

Yes

Please give reasons for your views and any alternative suggestions.

Mandating the disclosure of actual public float in listed issuers' annual reports is a practical and valuable reform. It enhances transparency, strengthens market integrity, and equips investors with better information—all while aligning with global standards and improving regulatory oversight. The benefits far outweigh any minor costs, making this a worthwhile step toward a more robust and trustworthy market.

Question 5.2

Do you agree with the details proposed to be disclosed (as set out in paragraph 126 of the Consultation Paper), including that only persons connected at the issuer level would be required to be identified on an individually named basis in the disclosure of shareholding composition (as set out in paragraph 126(b)(i)(1) and (2) of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Question 5.3

Do you agree that issuers should be required to disclose the relevant information based on information that is publicly available to the issuer

and within the knowledge of its directors (as set out in paragraph 127 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Question 6.1

Do you agree that the Exchange should require a minimum free float in public hands at the time of listing for all new applicants (as set out in paragraph 139 of the Consultation Paper)?

Yes

Please give reasons for your views.

Question 6.2

Do you agree with our proposed initial free float thresholds (as set out in paragraph 140 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Requiring a minimum free float in public hands at the time of listing is a sensible and necessary step for the Exchange. It ensures sufficient liquidity, supports effective price discovery, and aligns Hong Kong's listing regime with international best practices. While there are potential challenges, such as burdens on smaller issuers, the proposal's flexible structure mitigates these concerns effectively. The specific thresholds (10% with HK\$50 million or HK\$600 million) strike a practical balance, though they should be finalized with stakeholder input to optimize their impact.

Thus, we support the Exchange's proposal as set out in paragraph 139 of the Consultation Paper, believing it will enhance the market's robustness and attractiveness to both issuers and investors.

Question 6.3

Do you agree with our proposed modification of the initial free float thresholds to PRC issuers (as set out in paragraphs 142 to 143 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Question 6.4

Do you agree with our proposal to apply the proposed initial free float requirement to shares only (as set out in paragraph 144 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Question 6.5

Do you agree that shares considered to be in public hands that are held by an independent trustee under a share scheme should not be counted towards the proposed initial free float requirement (as set out in paragraph 145 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Question 6.6

Do you agree that existing free float related requirements for Biotech Companies and Specialist Technology Companies should be replaced with the proposed initial free float requirement so that the same requirement applies to all issuers (as set out in paragraph 146 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Replacing the existing free float requirements for Biotech and Specialist Technology Companies with the proposed initial free float requirement is a positive step. It simplifies the regulatory framework, promotes fairness, and enhances market efficiency while maintaining adequate liquidity and investor protections. The proposed standard—10% free float with a market value of HK\$50 million or HK\$600 million—strikes a practical balance, accommodating the needs of diverse issuers, including those in high-growth sectors.

We therefore support the proposal in paragraph 146 of the Consultation Paper, as it contributes to a more transparent, equitable, and competitive listing environment in Hong Kong.

Question 7.1

Do you agree with our proposed revised minimum thresholds on shares to be listed on the Exchange for A+H issuers and other prescribed types of issuers (as set out in paragraph 162 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Question 7.2

Do you agree that the minimum initial public float thresholds for A+H issuers and other prescribed types of issuers should be the same as the minimum thresholds on shares to be listed on the Exchange (as set out in paragraph 164 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Question 7.3

Do you agree with our proposal to remove the minimum market value requirement for the class sought to be listed by issuers with other share class(es) listed overseas and H shares of PRC issuers (as set out in paragraph 166 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Question 8

In respect of the lock-up requirement on IPO securities placed to cornerstone investors, would you prefer to:

allow a staggered release of the six-month lock-up (as set out in Option B in paragraph 205 of the Consultation Paper)

Please give reasons for your views and any alternative suggestions.

We back the staggered release of the cornerstone investor lock-up period under Option B to mitigate post-listing volatility. Yet, a three-month lock-up is too brief to stabilize markets effectively, especially for large IPOs. We propose a more flexible arrangement: 75% of cornerstone shares subject to a three-month lock-up post-listing, with the remaining 25% gradually released over the next three months. This balances market stability and investor flexibility, addressing the downward price pressure concerns noted in paragraph 22 of the Consultation Paper.

Question 9.1

Do you agree that at least 50% of the total number of shares initially offered in an IPO should be allocated to investors in the bookbuilding placing tranche (as set out in paragraphs 227 and 228 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Question 9.2

Do you agree that the proposed requirement should not be applied to the initial listing of Specialist Technology Companies (as set out in paragraphs 229 of the Consultation Paper)?

Yes

Please give reasons for your views.

Question 10.1

Do you agree with the proposed removal of the guideline on minimum spread of placees, being not less than three holders for each HK\$1 million of the placing, with a minimum of 100 holders in an IPO placing tranche (as set out in paragraph 230 of the Consultation Paper)?

No

Please give reasons for your views.

We oppose eliminating the requirement for 100 placees in the placing tranche. This rule ensures broad market participation, critical to market integrity. For smaller IPOs, reducing the threshold to 50 placees could be considered, but abolishing it entirely risks undermining market credibility and stability, conflicting with the open market purpose.

Question 10.2

Do you consider that other safeguarding measures should be implemented to ensure an adequate spread of holders in the placing tranche, in light of the proposal (as set out in paragraph 230 of the Consultation Paper)?

No

Please give reasons for your views and any alternative suggestions.

Question 11.1

Do you agree with the proposal to require issuers to adopt either Mechanism A or Mechanism B with respect to a minimum allocation of offer shares to the public subscription tranche (as set out in paragraphs 248 to 250 of the Consultation Paper)?

No

Please give reasons for your views and any alternative suggestions.

We do not agree with the proposal requiring issuers to adopt either Mechanism A or Mechanism B for the minimum allocation of offer shares to the public subscription tranche, as outlined in paragraphs 248 to 250 of the

Consultation Paper. We believe the proposed mechanisms fail to address the core issues in the IPO allocation process, particularly the dominance of cornerstone investors, and may distort the market further. Currently, cornerstone investors can subscribe to an unrestricted number of shares, limiting availability for book-building investors and undermining price discovery. The proposed mechanisms do not resolve this imbalance. Additionally, since the introduction of the FINI system, oversubscription rates have soared due to reduced financial barriers, making the current clawback triggers too easily activated.

Rather than replacing the existing system, which has functioned effectively for over 20 years, we recommend setting an upper limit on cornerstone investor subscriptions and raising the clawback trigger thresholds to reflect current market conditions, such as increasing the oversubscription multiples. These adjustments would better balance the interests of retail and institutional investors while preserving the flexibility and fairness of the IPO process.

Question 11.2

Do you agree with the proposal to require Specialist Technology Companies to only adopt the existing initial allocation and clawback mechanism designed for them, i.e. Mechanism A (as set out in paragraph 251 of the Consultation Paper)?

Please give reasons for your views.

Question 12.1

Do you agree that we should retain the Allocation Cap?

Yes

Please give reasons for your views.

Question 12.2

Subject to the proposals on minimum allocation of offer shares to the public subscription tranche (as set out in paragraph 248 of the

Consultation Paper) being adopted, do you agree with the proposed consequential amendments to the triggering conditions of the restrictions on Reallocation and PO Over-allocation (as set out in paragraph 262 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Please refer to our reply to Question 11.1 for the suggestion.

Question 12.3

Subject to the proposals on minimum allocation of offer shares to the public subscription tranche (as set out in paragraph 248 of the Consultation Paper) being adopted, do you agree with the proposed consequential amendments to lower the proposed Maximum Allocation Cap Percentage Threshold from 30% to 15% (as set out in paragraph 263 of the Consultation Paper)?

No

Please give reasons for your views and any alternative suggestions.

We consider the original Allocation Cap Percentage Threshold works well for years and striking an effective balance between retail and institutional investors.

Question 13.1

Do you agree that the Existing Pricing Flexibility Mechanism should be amended to include upward pricing flexibility?

Yes

Please give reasons for your views and any alternative suggestions.

We acknowledge that the proposed upward pricing flexibility (up to 10%) enhances price discovery efficiency, particularly with FINI enabling post-pricing settlement of retail subscription funds. However, to ensure fairness, we recommend mandatory disclosure of the revised price range and a minimum 24-hour cooling-off period for retail investors to reassess subscriptions. Raising prices without delaying the IPO timetable could spark concerns over procedural fairness, potentially destabilizing the market and clashing with the stability of the market.

Question 13.2

Do you agree with our proposals to adopt an offer price adjustment limit of 10% in both directions (as set out in paragraph 281 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Up to 20% of the bottom of that range (as set out in Option B of paragraph 282 of the Consultation Paper)

Question 13.3

In respect of the initial offer price range, would you prefer adjustment to be made:

up to 20% of the bottom of that range (as set out in Option B of paragraph 282 of the Consultation Paper)

Please give reasons for your views and any alternative suggestions.

Question 13.4

Do you agree with our Proposed Opt-in Arrangement (as set out in paragraphs 283 to 284 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Question 13.5

Do you agree with our proposal to extend the current disclosure requirements (as set out in paragraph 285 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Question 14

Do you agree with our proposals to make consequential and housekeeping amendments to the Placing Guidelines (as set out in paragraphs 302 and 303 of the Consultation Paper and Appendices I and II to the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Question 15

Do you agree with our proposal to disapply the proposed initial public float requirement in the case of a bonus issue of a new class of securities involving options, warrants or similar rights to subscribe for or purchase shares (as set out in paragraph 306 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Question 16

Do you agree with our proposal to add new provisions under Appendices D1A and D1B to the Main Board Listing Rules to require disclosure of the minimum prescribed percentage of public float in listing documents (as set out in paragraph 311 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Question 17

Do you agree with our proposal to waive the initial free float requirement for overseas issuers that have, or are seeking, a secondary listing on the Exchange (as set out in paragraph 315 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Question 18

Do you agree with our proposal to repeal the requirement that PRC issuers list H-shares that have an expected market value, at the time of listing, of HK\$50 million (as set out in paragraph 319 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Question 19

Subject to the proposals on minimum allocation of offer shares to the public subscription tranche (as set out in paragraph 248 of the Consultation Paper) being adopted, do you agree with the proposed consequential amendment to enable GEM listing applicants to choose either Mechanism A or Mechanism B (as set out in paragraph 325 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Question 20.1

Do you agree with our proposals on the determination of market capitalisation for new applicants that have other classes of shares apart from the class for which listing is sought or are PRC issuers (as set out in paragraph 333 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Question 20.2

Do you agree with our proposal to introduce an equivalent GEM Listing Rule provision on the basis for determining the market value of other class(es) of shares for a new applicant (as set out in paragraph 335 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Question 21

Do you agree with our proposal to amend the Listing Rules (MB Rule 12.02 (GEM Rule 16.07)) to require issuers to publish a formal notice on the date of issue of a listing document for offers or placings where any amount placed is made available directly to the general public (as set out in paragraph 339 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Question 22.1

Do you agree with our proposal to amend Chapter 18B of the Main Board Listing Rules so that the open market requirements of MB Rule 8.08 do not apply to Successor Company's warrants (as set out in paragraph 349(a) of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Question 22.2

Do you agree with our proposal to amend Chapter 18B of the Main Board Listing Rules so that the minimum market value requirement of MB Rule 8.09(4) does not apply to SPAC Warrants and Successor Company's warrants (as set out in paragraph 349(b) of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Question 23

Do you agree with our proposal to amend MB Rule 18C.08 so that the 50% minimum requirement is to be determined by reference to the total number of shares initially offered in the IPO (as set out in paragraph 352 of the Consultation Paper)?

Yes

Please give reasons for your views and any alternative suggestions.

Overall Comments

Please provide your overall comments (if any) regarding the Consultation Paper which have not been covered in the questions above.