

**Submitted via Qualtrics**

**Company / Entity View**

**Market Represent(s): Securities Market**

**Question 1**

**Do you have any comments or concerns on the proposed arrangements for the Hong Kong securities market?**

Yes

**If the answer is "Yes", please specify your comments or concern:**

I am really disappointed about the "Proposal on Sever Weather Trading of Hong Kong Securities and Derivatives Markets". In contrast with the "Employment Ordinance", the contract of employment is an agreement on the employment condition made between employer and employee. If there is any change in the condition of employment contract(work under Typhoon no. 8 or Black Rainstorm), the employer must obtain a consent from employee, Right? There is not compulsory to work without labour insurance cover, Right?

**Question 2**

**Do you have any comments or concerns on the proposed arrangements for Northbound Trading under Stock Connect?**

No

**If the answer is "Yes", please specify your comments or concern:**

N/A

**Question 3**

**Do you have any comments or concerns on the proposed arrangements for Hong Kong derivatives market?**

No

**If the answer is "Yes", please specify your comments or concern:**

N/A

**Question 4**

**Do you have any comments or concerns on the proposed arrangements for new listings and new products?**

No

**If the answer is "Yes", please specify your comments or concern:**

N/A

**Question 5a**

**Do you have any comments or concerns on the proposed money transfer arrangements in relation to Cheque Clearing?**

Yes

**If the answer is "Yes", please specify your comments or concern:**

It is not every brokerage securities firm which has enough human resources to work without physical control. This is a huge IT set up cost for prevention of any loss or damage arising from the server weather. Also, I am wonder if the paper cheque deposited prior to bank closure or after bank reopen on a SWT day will be processed and cleared on the same day. According to the client money rules, will SFC permit the fund transfer from house bank account to client trust bank account after SWT day? This is contrast with the guideline from SFC - Client Money Rules.

**Question 5b**

**Do you have any comments or concerns on the proposed money transfer arrangements in relation to Banking Services?**

Yes

**If the answer is "Yes", please specify your comments or concern:**

I am doubt about the transaction receipt from Client - How can we ensure the money receipt from client whether is not a third party deposit transaction. (no deposit slip, only check with the e-banking record)

**Question 6**

**Do you agree with the proposed arrangements for listing applicants and listed issuers as set out in paragraphs 90 – 91?**

Yes

**If the answer is "No", please specify your comments or concern:**

N/A

**Question 7**

**Do you agree with the proposed arrangements for listing applicants and listed issuers as set out in paragraphs 92 – 94?**

Yes

**If the answer is "No", please specify your comments or concern:**

N/A

**Question 8**

**Do you envisage there being any material practical difficulty in complying with any particular Listing Rule requirements?**

No

**If the answer is "Yes", please specify your comments or concern:**

N/A

### **Question 9**

**Do you agree that consequential amendments to the Listing Rules should be made?**

No

**If the answer is "No", please specify your comments or concern:**

How to ensure the internet and electric power which are keeping safety under the severe weather. Comparing with investor benefit, I think the personnel life safety is our first priority.

### **Question 10**

**Under the proposed model, do you foresee any insurmountable difficulties for implementing SWT?**

Yes

**If the answer is "Yes", please specify your comments or concern:**

Obviously, it is not every brokerage securities firm which has enough human resources to work without physical control. This is a huge IT set up cost for prevention of any loss or damage arising from the server weather. Also, I am wonder if the paper cheese deposited prior to bank closure or after bank reopen on a SWT day will be processed and cleared on the same day. According to the client money rules, will SFC permit the fund transfer from house bank account to client trust bank account after SWT day? This is contrast with the guideline from SFC - Client Money Rules.

### **Question 11**

**Would there be adequate time to prepare for SWT to come effective in July 2024 under the proposed model?**

No

**If the answer is "No", please specify the reasonable length and reason(s):**

effective in the July 2025

