Consultation on Exposure Drafts of HKFRS S1 and S2 (The Bank of East Asia, Limited)

No.	Questions	Comments / Recommendations
1.	Question 1— Do you agree with the proposal to issue HKFRS S1 and S2 on a fully converged basis with IFRS S1 and S2 with an effective date of 1 August 2025?	Agree, fully aligning HKFRS S1 and S2 with IFRS S1 and S2 would ensure consistency and comparability in sustainability reporting across different jurisdictions. However, there is some confusion surrounding HKFRS S2 and the HKEX's enhanced climate disclosure under HKEX ESG Reporting Code. To aid companies in their preparation, it would be beneficial to establish a clear timeline for transitioning from the existing HKEX climate disclosure regulations to HKFRS S2. Furthermore, the difference between the effective date and the implementation date has caused confusion among companies as well.
2.	Question 2— Do you have any other comments on the HK EDs?	Recommend clarifying that HKFRS S1 and S2 are not included within the scope of HKFRS accounting standards, as the term 'HKFRS' can lead to some confusion. Additionally, it would be helpful if the Standards offer implementation guidance, complete with illustrative examples, to assist companies in adhering to the disclosure requirements. Application guidance on how company to assess insufficient skills, capabilities or resources for quantitative anticipated financial effects is suggested. Clarification and interaction on materiality assessment between HKFRS S1, S2 and other sustainability reporting framework (e.g. GRI) is suggested.