

Consultation on Exposure Drafts HKFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information and Exposure Draft HKFRS S2 Climate-related Disclosures

No.	Questions / Relevant Excerpt	Concerns / Recommendations / Your Comments <i>(please provide detailed rationale and suggested alternatives where appropriate)</i>
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?	While we echo the importance for the full adoption of ISSB, we believe phased approach is needed to ensure high-quality and responsible disclosure. This is especially important in areas that are also highlighted during the Technical Feasibility Study (Appendix 3 of the Explanatory Memorandum), namely anticipated financial effect, Scope 3 GHG emission and financed emission and facilitated emission. More detailed guidelines, practices, data platforms and methodologies suitable to Hong Kong are needed to be developed before listed companies are ready for disclosure.
2.	Do you have any other comments on the HK EDs?	No comments.