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**To:** [P.T. Comment Letter](#)  
**Cc:** [Cheng, Kary](#)  
**Subject:** HKICPA INVITATION TO COMMENT ON EXPOSURE DRAFTS OF HKFRS S1 AND HKFRS S2  
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Dear Standard Setting Department of Hong Kong Institute of Certified Public Accountants,

I am writing to respond to Invitation to Comment on Exposure Draft HKFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information; and Exposure Draft HKFRS S2 Climate-related Disclosures published on 16 September 2024.

**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?**

Yes, we 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. As an active asset manager and member of the IFRS Sustainability Alliance, Matthews Asia believes that a standardized sustainability-related disclosure reporting framework would provide investors with comparable, high-quality reporting on sustainability issues, across time and markets.

In APAC region, we have responded and engaged in different consultations on sustainability disclosure including China, Hong Kong SAR, Japan, South Korea, Malaysia and India this year. The full alignment with the ISSB Standards is also an important step to maintain Hong Kong's status as an International Financial Centre and remain competitive. As we actively engage with local markets regulators and invest in Asia and Emerging Markets, we expect the adoption to align with the ISSB Standards to the fullest extent possible in order to ensure the availability of accurate and comparable sustainability information. These sustainability information are important for assisting us to better understand the sustainability risks and opportunities of our potential and portfolio companies for decision-making.

**Question 2: Do you have any other comments on the HK EDs?**

We understand that currently there are no concrete timelines for different authorities/regulators in Hong Kong including the HKEX, HKMA, SFC, MFPA, AND IA to determine the approach and timing of adopting HKFRS S1 and S2. Thus, we encourage the HKICPA to continue working with relevant authorities/regulators to promote and implement HKFRS S1 and S2 Standards. Furthermore, we suggest HKICPA to continue raising awareness and providing capacity building for relevant stakeholders to prepare for the HKFRS S1 and S2.

Thank you,  
Katie

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