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21 November 2012

By email: hytchiu@legco.gov.hk

Mr. Hugo Chiu Legislative Council Legislative Council Complex 1 Legislative Council Road Central Hong Kong

Dear Mr Chiu

Banking (Capital) (Amendment) Rules 2012

Thank you for your letter dated 16 November 2012 inviting our further comments on the implementation of Basel III standards in Hong Kong.

As stated in our letter of 15 November 2012, we do believe it is imperative that a level regulatory playing field is created and that the Basel III proposals are implemented globally. While the timetable for the implementation of the Basel III proposals will vary across jurisdictions, the major jurisdictions across the globe are heading in the same direction over the longer term. We believe that authorized institutions in Hong Kong have been consulted and are prepared for the implementation of Basel III standards. Furthermore, we believe that Hong Kong banks are overall well capitalised and should not have issues in fulfilling the new minimum capital standards. We will continue to work closely with the HKMA to monitor further developments in other major jurisdictions going forward.

We believe that by adopting Basel III standards from 1 January 2013, Hong Kong will reinforce its position as a leading financial centre, firstly by showing leadership in the implementation of the new standards, and also by giving authorized institutions clarity and stability with regard to the regulatory environment and their capital requirements.

I hope you would find our above comments helpful. Should you require any further information, please contact me at 2521 1160.

Yours sincerely

Ronie Mak

Secretary

Vice Chairmen

Chairman The Hongkong and Shanghai Banking Corporation Ltd

Bank of China (Hong Kong) Ltd

Standard Chartered Bank (Hong Kong) Ltd

Secretary Ronie Mak

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