



October 25, 2024.

Delivered via email: commentletters@hki CPA.org.hk

Dear Sir/Madam,

Re: Consultation on Exposure Drafts HKFRS S1 and HKFRS S2

British Columbia Investment Management Corporation (BCI) is an investment manager with over CAD \$250 billion in assets under management, and one of the largest institutional investors in Canada. Our investment activities help finance the pensions of approximately 725,000 people in our province, including university and college instructors, teachers, health care workers, firefighters, police officers, municipal and other public sector workers. On behalf of these pension beneficiaries, we provide long term capital to companies around the world that we believe will deliver strong and stable financial returns.

As a long-time supporter of the Sustainability Accounting Standards Board (SASB), and subsequently the International Sustainability Standards Board (ISSB), BCI welcomes the opportunity to provide feedback to the Hong Kong Institute of Certified Public Accountants (HKICPA) on its Exposure Drafts released in September 2024. This development is a significant milestone in the establishment of a global baseline of climate and sustainability-related financial disclosures for the capital markets in Hong Kong.

Global alignment of sustainability-related financial disclosures

As a large institutional investor, with a globally diversified portfolio, BCI strongly believes in the benefit of globally consistent, comparable, and reliable sustainability-related financial disclosures. This information is crucial to support investment decision making and allows investors to confidently assess and manage associated risk exposure. BCI agrees that the best way to achieve the desired global baseline across jurisdictions is through full alignment with the ISSB's standards. These standards, IFRS S1 and S2 specifically, build on existing and broadly accepted frameworks and standards, such as the Task Force for Climate-Related Financial Disclosures (TCFD) recommendations and the SASB industry-specific standards.

The IFRS standards have been endorsed by the International Organization of Securities Commissions (IOSCO) enhancing the prospect of global consistency, and success hinges upon the extent to which global jurisdictions adopt the standards as they are. Deviations from both the climate and sustainability standards, such as carve-outs, introduce the likelihood of reduced comparability and increase the burden and cost on issuers. We note that the ISSB's approach includes the phasing in of requirements which allow companies time to prepare for the new requirements.

August 30, 2024

With that view, we are pleased to see and fully support the full alignment between the ISSB standards and the proposed standards from the HKICPA.

Thank you again for the opportunity to opine on this important endeavour. We appreciate the attention that the HKICPA is paying to this with the release of these exposure drafts. Strong alignment between IFRS S1 and S2 and the KSSB Exposure Drafts can place Hong Kong in a leadership position and will be attractive to global investors like BCI.

For any clarifications related to this submission please contact Susan Golyak, Director, ESG at [**susan.golyak@bci.ca**](mailto:susan.golyak@bci.ca)

Sincerely,

A handwritten signature in blue ink that reads "Daniel Garant". The signature is fluid and cursive, with a long horizontal stroke at the end.

Daniel Garant
EVP & Global Head, Public Markets
cc Susan Golyak, Director, ESG