RESPONSE TO CONSULTATION PAPER

Consultation topic:	Proposed Amendments to Code on Collective Investment Schemes
Name[1]/Organisation: [1]if responding in a personal capacity	Respondent D

General comments:

Question 1: MAS seeks comments on the proposed requirements for Precious Metals Funds. MAS also seeks views on (i) imposing an NAV cap on Precious Metals Fund's investments in silver and/or platinum; or (ii) only allowing a Precious Metals Fund to invest in gold, for a start.

-

Question 2: MAS seeks comments on the proposed disclosure requirements on a fund manager's credit assessment practices.

-

Question 3: MAS seeks comments on the proposal to require additional disclosures on securities lending or repo in the fund's semi-annual and annual reports.

-

Question 4: MAS seeks comments on the proposal to extend the additional disclosure requirements under the CIS Code to Recognised funds.

-

Question 5: MAS seeks comments on the proposal to require managers of Authorised and Recognised funds to ensure that advertisement on such funds are prepared in accordance with the CBPA and the RDPA.

-

Question 6: MAS seeks comments on the proposal to require a REIT to calculate WALE based on the date of commencement of the leases.

-

Question 7: MAS seeks comments on the proposed requirement for a REIT to hold its first AGM within 18 months of its authorisation.

-

Question 8: MAS seeks comments on the proposal to allow all funds, except property funds and hedge funds, to pay out redemption proceeds within 7 business days from the receipt of the redemption request.

-

Question 9: MAS seek comments on the proposal to replace the phrase "passing rents of the underlying sub-leases" in the CIS Code with the phrase "market rents of the underlying sub-leases at the time of entry or renewal of the master lease arrangement", where "market rent" is defined using existing valuation standards.

Must the REIT obtain valuation reports each time a master lease is entered into to justify that the master lease rent is at market to avoid being classified as income support? For commercially negotiated master lease with master tenants that are not related to the vendor of the property, it might not be necessary to incur expenses to conduct a valuation. Such leases are not intended to be income support as the tenant is not related to the vendor of the property. Such unrelated parties are also unlikely to agree to disclose their end rents to the REIT as these may be their trade secrets. Secondly, does MAS intend to amend the PFA to provide that the disclosure of income support is on the difference between master lease rent and the market rent rather than the underlying sub lease rent?

Question 10: MAS seeks comments on the proposal to allow an SGX-listed REIT to issue summary financial statements to unitholders in place of full financial statements and report.

This should not be restricted to accounts and reports and can be expanded to any notices or documents, minus takeover and rights issue documents, e.g. EGM circulars could be covered.

Question 11: MAS seeks comments on the proposals to allow a REIT to also send its accounts and reports to unitholders by electronic means.

-