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 B

General comments:

NIL.

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.

No comments.

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

No comments.

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.

No comments.

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

No comments.

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.

No comments.

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

No comments.

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

No comments.

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.

We do not have any 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.

However, Para 3.2 (a) of the Code on Collective Investment Schemes requires a manager to pay out, or cause to be paid out, redemption proceeds to the scheme's participants within certain timeframes and the proceeds are deemed to be paid only on the day the participant's account is credited or a cheque is mailed to the participant. The Guidance note to this paragraph further states that " A participant refers to the end-investor who is a beneficial owner of the units and excludes a distributor or a Central Provident Fund ("CPF") Agent Bank." We would like to request that MAS relook at this paragraph and its guidance note. It is not practical to place on the manager this obligation to ensure that the redemption proceeds are credited to the end investor's account or a cheque is mailed out to the end investor within the set timeframes. The manager can only ensure that the redemptions proceeds are paid out to its customer within the set timeframes. Where the manager's customer on record is a distributor, a trustee or other nominee of the end investor, the manager cannot be held responsible for any delay in payment by such distributor, trustee or nominee to the end investor and is in no position to ensure that the proceeds are credited to the end investor's account or a cheque is mailed to the end investor within the set timeframes.

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.

No comments.

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.

No comments.

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

No comments.