RESPONSE TO CONSULTATION PAPER

Consultation topic:	Proposed Amendments to Code on Collective Investment Schemes
Name[1]/Organisation: [1]if responding in a personal capacity	Legg Mason Asset Management Singapore Pte. Limited

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.

<Please fill in your response to each question in the blank space below the question.>

NA

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

We hope the MAS can understand that only a summary can be provided in the Prospectus. Description of the process in full detail would not be feasible due to the length of the full process in the prospectus.

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.

We seek the MAS's understanding to give us more transition time in order to incorporate the new requirements to our reports.

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

The disclosure requirements that are proposed to be applied to the recognised scheme are generally fine from Irish law perspective. However, there are some requirements

that are not Irish requirements and may have the impact of incurring additional cost to ensure compliance. E.g. paragraph 8.6 of Appendix 1 of the Code of CIS requires the prospectus to include a statement that legal opinions has been obtained where a scheme nets its OTC financial derivative positions. It will be good to remove this additional requirement given recognition is done on the basis of the laws and regulations of the relevant jurisdiction of the funds being substantially the same as those in Singapore. There will be cases where they are different and the preference is to minimise additional compliance requirements to the interest of investors.

For other areas, we will do our best to meet the additional disclosures for our Recognised funds but we hope the MAS will give us more transition time in order to allow the background works to take place.

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.

We would like to seek clarification on the RDPA 2(g) on how should we disclose the information for funds which are less than 1 year?

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

NA

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

NA

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.

Operationally, there should be no issue since the intention is to align the periods for payment of redemption proceeds, and to allow all funds to pay out redemption proceeds within 7 business days from the receipt of the redemption request.

This is based on the feedback MAS received that current 4 business day redemption periods for bond and money market funds presents operationally difficulties.

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.

NA

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.

NA

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

NA