

Apex Asset Management Sdn Bhd

Hi Mr See,

Please find below our comment on the proposed Compliance Guidelines for Fund Managers:

1. Guideline on the vacancy of a Compliance Officer;
2. Guideline on transactions by the Compliance Officer;
3. Guideline on performance of the Compliance Officer, who to appraise the Compliance Officer;
4. Submission of monthly report by Compliance Officer to SC;
5. A notice to be put up stating the Compliance Officer's name;
6. Details on "Know you Client Rule" may need further elaboration;
7. Phone recordings to be kept for how many years?;
8. Rule 18.26 "Goods" is too subjective. Is computer hardware and software permitted and how is computer hardware and software be beneficial to the client under Rule 18.29?;
9. Propose to include rule that Fund Manager shall not be engaged/participate in any other business activity and be a director or as shareholder in any company which is formed for the purpose of dealing in share;
10. How about quarterly disclosures?;
11. The details on advertisements may need further elaboration in definition for Marketing Materials and Advertisement. What is the different between marketing materials and advertisements, sales and other forms of communication to the public?
12. Propose to include in Rule 18.69 that clients who failed to provide evidence of this identity should not be allowed to engage in business transactions.

Best regards.
Cassie