

**PROSPECTUS REQUIRED PURSUANT TO DIVISION 2 PART XIII OF THE SECURITIES AND
FUTURES ACT (CHAPTER 289 OF SINGAPORE)**

relating to

SINGAPORE INDEX FUND

Registered with the Monetary Authority of Singapore on 28 October 2016

An application was made to the Singapore Exchange Securities Trading Limited ("SGX-ST") on 22 October 1996 for permission to list and deal in and for quotation of all units (the "Units") in the Singapore Index Fund (the "Fund") which may be issued from time to time. Such permission has been granted by the SGX-ST and the Fund was admitted to the Official List of the SGX-ST on 20 December 1996. The SGX-ST assumes no responsibility for the correctness of any of the statements made, opinions expressed or reports contained in this Prospectus. Admission to the Official List is not to be taken as an indication of the merits of the Fund or the Units.

SINGAPORE INDEX FUND

DIRECTORY

Managers

Singapore Consortium Investment Management Limited
(Company Registration Number: 199607548K)
51 Cuppage Road, #10-04, Singapore 229469

Directors of the Managers

Boon Swan Foo
Tan Hui Keng Martha
Richard Rokmat Magnus
See Yong Kiat
Frederick Lai Yao Long

Trustee / Registrar / Administrator

HSBC Institutional Trust Services (Singapore) Limited
(Company Registration Number: 194900022R)
21 Collyer Quay, #13-02 HSBC Building, Singapore 049320

Custodian

The Hongkong and Shanghai Banking Corporation Limited
1 Queen's Road Central, Hong Kong

Auditors

PricewaterhouseCoopers LLP
8 Cross Street, #17-00 PWC Building, Singapore 048424

Solicitors to the Managers

Tan Peng Chin LLC
30 Raffles Place, #11-00 Chevron House, Singapore 048622

Solicitors to the Trustee

Shook Lin & Bok LLP
1 Robinson Road, #18-00 AIA Tower, Singapore 048542

SINGAPORE INDEX FUND

TABLE OF CONTENTS

Contents	Page
1. Basic Information	1
2. The Managers	2
3. The Trustee	7
4. The Custodian	8
5. The Register of Holders	8
6. The Auditors	9
7. Investment Objective, Focus and Approach	9
8. Fees and Charges	12
9. Risks	13
10. Listing on SGX-ST	20
11. Subscription of Units	20
12. Realisation of Units	24
13. Compulsory Realisations	26
14. Switching of Units	27
15. Obtaining Prices of Units	28
16. Suspension of Dealing	28
17. Performance of the Fund and Benchmark	29
18. Soft Dollar Commissions/Arrangements	31
19. Market Timing	31
20. Conflicts of Interest	32
21. Reports	33
22. Distribution of income and capital	34
23. Other Material Information	34
24. Investment Restrictions	43
25. Taxation	43
26. Queries and Complaints	46
Appendix A – Investment and Borrowing Guidelines	47
Appendix B – Financial Statements	62

SINGAPORE INDEX FUND

IMPORTANT INFORMATION

We, the managers of the Singapore Index Fund (the "**Fund**"), Singapore Consortium Investment Management Limited (the "**Managers**"), and our directors (the "**Directors**"), individually and collectively accept full responsibility for the accuracy of the information contained in this prospectus ("**Prospectus**") and confirm, having made all reasonable enquiries, that to the best of our knowledge and belief, the facts stated and the opinions expressed in this Prospectus are fair and accurate in all material respects as at the date of this Prospectus and there are no material facts, the omission of which, would make any statement in this Prospectus misleading. Where information in this Prospectus has been extracted from published or otherwise publicly available sources or obtained from a named source, the sole responsibility of the Directors has been to ensure that such information has been accurately and correctly extracted from those sources and/or reproduced in this Prospectus in its proper form and context. Unless otherwise stated or the context otherwise requires, all terms not defined in this Prospectus have the same meanings as used in the deed of trust dated 12 November 1996 (as amended) relating to the Fund (the "**Deed**").

You should refer to the provisions of the Deed and note that this Prospectus may be supplemented or replaced from time to time to reflect material changes. You should obtain independent professional advice in any event of any doubt or ambiguity relating to the provisions of the Deed or this Prospectus.

Units in the Fund (the "**Units**") deposited with The Central Depository (Pte) Limited (the "**CDP**") will be traded on the SGX-ST at market prices throughout the trading day. Market prices for Units may, however, be different from their Value (as calculated in accordance with the Deed). Any listing and quotation of Units on the SGX-ST does not guarantee a liquid market for the Units.

This Prospectus does not constitute an offer, solicitation or invitation to subscribe for the Units in any jurisdiction in which such offer, solicitation or invitation is not authorised or to any person to whom it is unlawful to make such offer, solicitation or invitation. No action has been or will be taken under the requirements of the legislation or regulations of or the legal or regulatory authorities of any jurisdiction except for the registration of this Prospectus in Singapore. The distribution of this Prospectus and the offer of the Units in certain jurisdictions may be restricted by the relevant laws in such jurisdictions. Persons who may come into possession of this Prospectus are required to inform themselves about, and to observe, any such restrictions at their own expense and without liability to us or the Fund.

Copies of this Prospectus and the application forms may be obtained on request, subject to availability, from the branches of the following banks (the "**Distributing Agents**") or any other distributors as may be appointed by us from time to time:

DBS BANK LTD.
SINGAPORE ISLAND BANK LIMITED
UNITED OVERSEAS BANK LIMITED
OVERSEA-CHINESE BANKING CORPORATION LIMITED

You should seek professional advice to ascertain (a) the possible tax consequences, (b) the legal requirements or (c) any foreign exchange restrictions or exchange control requirements which you may encounter under the laws of the countries of your citizenship, residence or domicile and which may be relevant to the subscription, holding or disposal of Units, and should inform yourselves of and observe all such laws and regulations in any relevant jurisdiction that may be applicable to you.

No person, other than us, has been authorised to issue any advertisements or to give any information, or to make any representations in connection with the offering, subscription or sale of Units, other than those contained in this Prospectus and, if issued, given or made, such advertisements, information or representations must not be relied upon as having been authorised by the Fund, the Trustee or us.

You should also consider the risks of investing in the Fund which are summarised in paragraph 9 of this Prospectus.

Applications may be made in other jurisdictions to enable the Units to be marketed freely in those jurisdictions.

Prohibition against U.S. investors

The Units are being offered and sold outside the United States to persons that are not:

- (a) U.S. Persons (as defined in Regulation S promulgated under the Securities Act of 1933 of the United States of America ("**U.S.**"), as amended (the "**U.S. Securities Act**")) in reliance on Regulation S promulgated under the U.S. Securities Act; or
- (b) "United States persons" (as defined in Section 7701(a)(30) of the U.S. Internal Revenue Code, as amended, and referred to herein as "**U.S. Taxpayers**"). Currently, the term "**U.S. Taxpayer**" includes: a U.S. citizen or resident alien of the United States (as defined for U.S. federal income tax purposes); any entity treated as a partnership or corporation for U.S. tax purposes that is created or organised in, or under the laws of, the United States or any state thereof (including the District of Columbia); any other partnership that may be treated as a U.S. Taxpayer under future U.S. Treasury Department regulations; any estate, the income of which is subject to U.S. income taxation regardless of source; and any trust over whose administration a court within the United States has primary supervision and all substantial decisions of which are under the control of one or more U.S. fiduciaries. Persons who have lost their U.S. citizenship and who live outside the United States may nonetheless, in some circumstances, be treated as U.S. Taxpayers. Persons who are aliens as to the United States but who have spent 183 days or more in the United States in any of the last two years should check with their tax advisors as to whether they may be considered residents of the United States.

Units are not and may not be offered, made available, sold to or for the account of any U.S. Persons or U.S. Taxpayers. You may be required to declare that you are not U.S. Taxpayers and that you are neither acquiring Units on behalf of U.S. Taxpayers nor acquiring Units with the intent to sell or transfer them to U.S. Taxpayers.

Foreign Account Tax Compliance Act ("FATCA")

FATCA was enacted in 2010 by the United States Congress as part of the U.S. Hiring Incentives to Restore Employment (HIRE) Act to target non-compliance with tax laws by U.S. Taxpayers using overseas accounts. Under FATCA, financial institutions outside of the U.S. are required to regularly submit information on financial accounts held by U.S. Taxpayers to the U.S. tax authorities. Failure to comply with FATCA may, amongst other things, subject the Fund to U.S. withholding tax on certain types of payments made to the Fund. Accordingly, it is intended that the Fund comply with FATCA.

For the purpose of complying with FATCA, we, the Trustee and/or other service providers of the Fund may be required to report and disclose information on certain investors in the Fund to the U.S. tax authorities and/or such Singapore authority as may be required under Singapore laws and regulations implemented as part of the intergovernmental agreement ("**IGA**") entered into between the U.S. and Singapore¹ in connection with FATCA and/or withhold certain payments to such investors.

You are required to:

- (a) provide such information, documents and assistance in connection with the above as we and/or the Trustee may require from time to time; and
- (b) notify us or any of our authorised agents or distributors in writing immediately in the event that you are or have become a U.S. Taxpayer, or are holding Units for the account of or benefit of a U.S. Taxpayer.

You are also deemed to have consented to us, the Trustee and/or other service providers to the Fund carrying out our obligations in reporting and disclosing information on you and your investments to the U.S. tax authorities and/or such Singapore authority as may be required under Singapore laws and regulations implemented as part of the IGA entered into between the U.S. and Singapore.

We may compulsorily realise all or part of the Units held by you under the circumstances described at paragraph 13 of this Prospectus.

All enquiries in relation to the Fund should be directed to us, Singapore Consortium Investment Management Limited.

¹ Pursuant to the IGA entered into between Singapore and the U.S. on 9 December 2014, Singapore-based financial institutions will report information on financial accounts held by U.S. Taxpayers to the Inland Revenue Authority of Singapore (IRAS), which will in turn provide the information to the U.S. tax authorities.

Personal Data Protection

You consent and acknowledge that any personal data provided to us, the Trustee, the Custodian, the registrar and/or our respective appointed representatives, agents, service providers and/or affiliates and related corporations (“**Recipients**”, each a “**Recipient**”) whether directly or through appointed agents or Distributing Agents, or otherwise collected by a Recipient or on behalf of a Recipient (by any person including but not limited to the CDP in connection with the subscription for Units), including any personal data relating to third party individuals (e.g. beneficial owners, directors or authorised signatories of investors who are not individuals) (“**Data**”) may be collected, used, disclosed, processed and stored by a Recipient for the following purposes:

- (a) updating and maintaining the Register;
- (b) processing instructions or trades of investors or persons acting on behalf of investors;
- (c) complying with any applicable rules, laws or regulations, regulatory policies, guidelines or industry codes, orders, directions or requests issued by any court, legal or regulatory bodies including rules and regulations relating to anti-money laundering and countering the financing of terrorism and the carrying out of audit checks, surveillance and investigation;
- (d) preventing, detecting and investigating crime, offence or unlawful activity including but not limited to fraud, money-laundering, terrorist financing and bribery, and analysing and managing commercial risks;
- (e) complying with any applicable treaty or agreement with or between Singapore and a foreign jurisdiction;
- (f) fulfilling a judgment or order of court or of any other tribunal within Singapore and in an applicable foreign jurisdiction;
- (g) providing client-related services including providing customer support, responding to queries or feedback given by investors or persons acting on behalf of investors, and generating, communicating with and disseminating notices, reports, correspondence, statements, invoices, confirmations and advices to investors or persons acting on behalf of investors;
- (h) verifying the identity of investors or persons acting on behalf of investors;
- (i) reviewing and approving investors’ account(s), and the conduct of initial and anticipatory credit checks and assessments, relevant checks, ongoing assessment and verification of ongoing credit worthiness and standing;
- (j) legal claims, actions or proceedings including but not limited to drafting and reviewing documents, obtaining legal advice and facilitating dispute resolution or exercising or enforcing the rights of a Recipient under contract or pursuant to applicable laws and regulations;

- (k) administering, operating, processing or managing the Units or the Fund;
- (l) meeting or complying with the Recipient's internal policies and procedures;
- (m) handling feedback, queries or complaints;
- (n) maintaining the security of the Recipient's premises including but not limited to the use of forms of surveillance such as security cameras;
- (o) facilitating any proposed or actual business assignment, transfer, participation or sub-participation in any of the Recipient's rights or obligations in respect of the investor's relationship with the Recipient;
- (p) designing and marketing financial services or related products;
- (q) conducting general administration in relation to the above;
- (r) such other purposes as set out in the Trustee's data protection policy and data privacy statement (as each may be amended from time to time, copies of which are available at <http://www.hsbc.com.sg/1/2/miscellaneous/privacy-and-security>); and
- (s) all purposes reasonably related to one or more of the above.

Where you provide personal data relating to third party individuals to a Recipient, you warrant that the prior consent of such third party individual has been obtained, which will allow a Recipient to collect, use, disclose, process and store that personal data in the manner and for the purposes described above, and you consent and acknowledge to all such collection, use, disclosure, process and storage on behalf of that third party individual.

You consent and acknowledge that Data may be disclosed and transferred to the following parties, in Singapore or in a foreign jurisdiction, for the purposes set out above: (a) any person or entity including government authorities, regulatory bodies, courts and tribunals to whom a Recipient is under an obligation to make disclosure pursuant to any domestic or foreign legal process, legal obligation or regulatory obligation; (b) related corporations of ours, the Trustee, the Custodian or the registrar; and (c) any agent, contractor or third party service provider who provides administrative, mailing, data processing, business process, human resource, information technology or other services to a Recipient in connection with the operation of the business of a Recipient or the administration and operation of the Fund.

You may, after consenting to the collection, use, disclosure, process and storage of Data, withdraw your consent by giving notice in writing to us, whether directly or through our appointed agents or the Distributing Agents. You should note that we (in consultation with the Trustee) could deem a notice of withdrawal of consent to be a request for the redemption of all your Units.

You undertake to ensure that all information provided to the Recipient is true, accurate and complete and that changes to any such information will be notified to the Recipient in a timely manner.

SINGAPORE INDEX FUND

The Singapore Index Fund (the "Fund") offered in this Prospectus is an authorised scheme under the Securities and Futures Act, Chapter 289 of Singapore ("SFA"). A copy of this Prospectus has been lodged with and registered by the Authority. The Authority assumes no responsibility for the contents of this Prospectus. The registration of this Prospectus by the Authority does not imply that the SFA or any other legal or regulatory requirements have been complied with. The Authority has not, in any way, considered the investment merits of the Fund. The meanings of terms not defined in this Prospectus can be found in the Deed.

1. Basic Information

1.1 Singapore Index Fund

The Fund is an open-ended standalone unit trust scheme constituted in Singapore on 12 November 1996. The Fund is presently offering for subscription Units in the Fund for such periods as we may decide. Each Unit represents an undivided share in the Fund.

1.2 Date of Registration and Expiry of Prospectus

The date of registration of this Prospectus with the Authority is 28 October 2016. This Prospectus will be valid for a period of 12 months after the date of registration (i.e. up to and including 27 October 2017) and will expire on 28 October 2017.

1.3 Trust Deed and Supplemental Deeds

1.3.1 The Deed of Trust relating to the interests being offered for subscription or purchase (the "**Principal Deed**") is dated 12 November 1996 and the parties to the Principal Deed are Singapore Consortium Investment Management Limited (the "**Managers**") and HSBC Institutional Trust Services (Singapore) Limited (the "**Trustee**").

1.3.2 The Principal Deed has been amended by the following deeds (the "**Supplemental Deeds**"):

Supplemental Deed	Dated
Supplemental Deed	28 January 1999
Second Supplemental Deed	26 January 2000
Third Supplemental Deed	19 January 2001
Amending and Restating Deed	24 January 2003
Second Amending and Restating Deed	24 January 2005
Third Amending and Restating Deed	23 January 2006

Fourth Amending and Restating Deed	5 January 2007
Fifth Amending and Restating Deed	12 December 2008
Sixth Amending and Restating Deed	8 December 2009
Seventh Amending and Restating Deed	30 November 2010
Eighth Amending and Restating Deed	28 September 2011
Ninth Amending and Restating Deed	15 November 2012
Tenth Amending and Restating Deed	17 February 2014
Fourth Supplemental Deed	31 July 2015
Eleventh Amending and Restating Deed	28 October 2016

The Principal Deed as amended by the Supplemental Deeds is referred to as the "**Deed**".

- 1.3.3 The terms and conditions of the Deed are binding on each holder of Units (referred to as a "**Holder**") and persons claiming through such Holder as if (a) such Holder had been a party to the Deed and (b) the Deed contained covenants on such Holder to observe and be bound by the provisions of the Deed and an authorisation by each Holder to do all such acts and things as the Deed may require the Trustee and/or us to do.
- 1.3.4 A copy of the Deed is available for inspection free of charge at our operating office at 51 Cuppage Road, #10-04, Singapore 229469 during normal business hours (subject to such reasonable restrictions as we may impose) and will be supplied by us upon request at a charge of S\$25 per copy of the document (or such other amount as we and the Trustee may agree).
- 1.3.5 Please note that this Prospectus does not contain all of the provisions of the Deed and those stated here have, to a large extent, been summarised. ***You should refer to the Deed for details.***

1.4 Accounts and Reports

Copies of the Fund's latest semi-annual and annual reports, semi-annual and annual accounts as well as the auditors' report on the annual accounts may be obtained, upon request, during normal business hours (subject to such reasonable restrictions we may impose) from our operating office at 51 Cuppage Road, #10-04, Singapore 229469.

2. The Managers

2.1 The Managers

We, Singapore Consortium Investment Management Limited, are the Managers and our registered office is at 51 Cuppage Road, #10-04, Singapore 229469.

We hold a capital markets services licence issued by the Authority to carry on business in fund management for retail investors, and have been managing the Fund in Singapore since 1996. As of 3 October 2016, we are also the managers of Global Investments Limited ("**GIL**"), a mutual fund company listed on the Mainboard of the SGX-ST.

We were incorporated in Singapore on 18 October 1996 with an issued and paid-up share capital of S\$6. Our current issued and paid-up share capital is S\$510,000, comprising 510,000 ordinary shares.

Prior to 29 December 2015, we were owned by Nikko Asset Management International Limited, UOB Asset Management Ltd and Oversea-Chinese Banking Corporation Limited in equal shares. Pursuant to a share purchase agreement dated 25 November 2015, all the shares in our capital were sold to Allgrace Investment Management Private Limited ("**AIM**") on 29 December 2015 and we became a wholly-owned subsidiary of AIM. AIM has held a capital markets services licence issued by the Authority to carry on business in fund management for accredited and institutional investors since 2013.

Our role and responsibilities are set out in the Deed. We are responsible for, among other things, the issue, cancellation and realisation of Units, the investment management of the Deposited Property (as defined in the Deed) of the Fund, the determination of distributions by the Fund (if any) and the administration of the Fund.

We have delegated our accounting and valuation functions in respect of the Fund to the administrator whose details are set out in paragraph 5 below.

We will remain as the managers of the Fund until we retire or are removed pursuant to the Deed. A summary of the provisions relating to the retirement and removal of the Managers is set out in paragraph 23.5.

2.2 Directors of the Managers

The names, addresses, relevant experience and directorships of the Directors are as follows:

Mr Boon Swan Foo, of 51 Cuppage Road, #10-04, Singapore 229469, is our Chairman and Chief Executive Officer ("**CEO**").

Mr Boon is a Senior Advisor to Temasek International Advisors Pte Ltd. He also serves on the boards of several overseas companies which are significant and major players in their respective markets, namely Intouch Holdings Plc, a telecommunications and satellite holding company listed on the Stock Exchange of Thailand; Dongfeng Motor Corporation (China), an automobile manufacturer; China National Offshore Oil Corporation, a national oil company; and China Huadian Corporation, a power generation company. Mr Boon is also the Chairman and non-executive Director of GIL.

Mr Boon served as CEO and Deputy Chairman of ST Engineering Ltd from October 1997 to May 2001, and was the Managing Director of Agency for Science, Technology and

Research (“**A*STAR**”) from January 2002 to January 2006. For his stewardship of ST Engineering Ltd, Mr Boon was awarded one of Singapore’s most prestigious business awards, the Singapore Business Award for Outstanding CEO in 2000.

Mr Boon is a member of the Institute of Singapore Chartered Accountants and a Fellow of the Chartered Association of Certified Accountants (UK)-ACCA. He holds an MBA from the National University of Singapore and has completed Harvard’s Advanced Management Program. Presently, he holds an Adjunct Professorship at Nanyang Technological University.

Ms Tan Hui Keng Martha, of 51 Cuppage Road, #10-04, Singapore 229469, is one of our non-executive Directors. She was previously an audit partner of KPMG LLP from 1989 to 2005 and has more than 25 years of experience in the public accounting field, which includes auditing, taxation, public listings, due diligence, mergers and acquisitions, internal control reviews and general business advisory services.

She was a Director of ST Asset Management Ltd (“**STAM**”) from 2010 to 2011 and a Director of Vertex Management (II) Pte Ltd from 2007 to 2009. She is currently a non-executive Director of Singapura Finance Limited, a Finance Company licenced by the Authority and listed on the Main Board of the SGX-ST.

Ms Tan holds a Degree (Honours) in Accountancy from the University of Singapore and is a Fellow member of the Institute of Singapore Chartered Accountants.

Mr Richard Rokmat Magnus, of 51 Cuppage Road, #10-04, Singapore 229469, is one of our non-executive Directors. He was previously Senior District Judge (now termed Chief District Judge) of the State Courts of Singapore. Mr Magnus had a distinguished public service career with the Singapore Legal Service. In recognition of his sterling contributions to the nation, he was conferred the Public Administration Medal (Silver) in 1983, the Public Administration Medal (Gold) in 1994, the Public Administration Medal (Gold) (Bar) in 2003 and the Meritorious Service Medal in 2009.

Mr Magnus is currently the Chairman of the Remote Gambling Advisory Panel, The Public Transport Council, the Bioethics Advisory Committee, the Political Films Consultative Committee, the Public Guardian Board and Temasek Cares CLG Limited. Mr Magnus also serves on the boards of CapitaLand Mall Trust Management Ltd, Changi Airport Group (Singapore) Pte Ltd and Honour (Singapore) Ltd. He is a member of the Public Service Commission and UNESCO’S International Bioethics Committee and also serves as a Panel Member of the Ministry of Home Affairs’ Independent Panel Review Committee.

Mr Magnus graduated with a Bachelor of Laws (Honours) and a Masters of Laws from the National University of Singapore. He is also an alumnus of the Harvard Business School and JF Kennedy School of Government. He is an editor of five legal practitioners’ books on law: Assessment of Damages – Personal Injuries and Fatal Accidents 1st & 2nd Edition, Family Court Practice, Evidence in Criminal Trials and Sentencing Practice in the Subordinate Courts 2nd Edition.

Mr See Yong Kiat, of 51 Cuppage Road, #10-04, Singapore 229469, is one of our non-executive Directors. He is currently Managing Director (Fund Management) and a member of the Investment Committee of STAM. Mr See heads a team of fund managers and research analysts responsible for identifying, evaluating and overseeing investments in public and private equities, convertible bonds and credits in Asia and other emerging markets. He has extensive investment management experience in a broad range of asset classes and financial instruments, including investment grade and high yield credits, structured finance and asset backed securities.

From November 2010 to May 2013, Mr See held the position of Chief Operating Officer ("**COO**") of STAM and was responsible for the middle and back office operations, supervising and monitoring the day-to-day operations and ensuring that activities comply with the organisational requirements of the firm. Prior to his appointment as COO, he held the position of Chief Investment Officer, overseeing the investment portfolios managed by STAM and supervising a team of fund managers and research analysts.

Prior to joining STAM in 2002, Mr See spent 13 years in asset management with Overseas Union Bank Limited ("**OUB**") group. He began his career with Kankaku Merchant Bank where he was responsible for equity sales of Japanese securities to local and regional clients.

Mr See is currently a Manager Nominated Director of GIL.

Mr See holds a Bachelor of Business Administration (Second Class Upper Honours) degree from the National University of Singapore.

Mr Frederick Lai Yao Long, of 51 Cuppage Road, #10-04, Singapore 229469, is one of our non-executive Directors. He is Vice President, Fund Administration of STAM where he is responsible for middle office operations which include unit trust administration, clients' portfolio administration and liaising with banks, trustees as well as the registrars. From March 1967 to December 2001, Mr Lai was with the OUB group where he gained extensive experience in bills and remittances, retail branch operations and custodial services operations. He also spent seven years in OUB's London office and three years in OUB's New York office. His last held appointment was that of Chief Representative in OUB's Ho Chi Minh Representative Office, Vietnam from May 2000 to December 2001.

Mr Lai received a Bachelor of Science (Second Class Honours First Division) in Business & Management Studies from University of Bradford, London and is an Associate with the Institute of Bankers, London.

The past performance of the Directors is not necessarily indicative of their future performance.

2.3 Key Executives of the Managers

Mr Boon Swan Foo (whose details are set out in paragraph 2.2) is our Chairman and CEO. He is the principal portfolio manager managing the assets of the Fund and he also

serves as Chairman of our Investment Committee and Chairman of our Investment Division.

Mr Wong Fook Loy, of 51 Cuppage Road, #10-04, Singapore 229469, is a portfolio manager of the Fund and a member of our Investment Committee. He also serves as Vice President of our Investment Division.

Mr Wong joined AIM in January 2014 and was Vice President, Investment where he had been responsible for evaluating and monitoring investments in equities, structured finance products (residential mortgage-backed securities (“**RMBS**”) and collateralised loan obligations. Prior to this, Mr Wong was at STAM from May 2002 to January 2008 where he last held the position of Fund Manager, and was also a member of its Investment Committee. While at STAM, Mr Wong was involved in the management of developed and emerging markets equities and structured finance products, including collateralised debt obligations (“**CDO**”) and U.S. RMBS. He supervised a team of analysts which covered equities and fixed income, and was involved in selecting CDO/RMBS credits for CDO portfolios for STAM in its capacity as Collateral Manager.

From April 2001 to April 2002, Mr Wong was a research analyst with OUB Asset Management Ltd where he covered equities and fixed income and was involved in the development and modelling of Structured Financial Products, including Credit Default Swaps and CDOs.

Mr Wong holds a Bachelor of Arts (Hons in Physics) from Oxford University and is also a CFA Charter Holder.

Mr Terence Aw Hai Chien, of 51 Cuppage Road, #10-04, Singapore 229469, is a portfolio manager of the Fund and a member of our Investment Committee. He also serves as Vice President of our Investment Division.

Mr Aw joined AIM as Vice President of Investment, where he was responsible for managing AIM’s structured product portfolio, operating lease assets and macroeconomic research. From August 2013 to April 2014, he was Vice President, Risk Management & Compliance at AIM where he was responsible for developing and maintaining AIM’s system of risk management and internal controls.

Prior to joining AIM, Mr Aw was Assistant Vice President of Risk Management and Compliance at STAM from December 2011 to August 2013, where he performed quantitative risk analyses for equities and fixed-income portfolios and macro-analysis for public and private equities.

From October 2007 to April 2011 he undertook various roles at Exploit Technologies Pte Ltd, the commercial arm of A*STAR, where he performed market analysis and private equity company valuation covering technology and consumer goods markets.

Mr Aw graduated with a Bachelor of Business Management majoring in Finance from the Singapore Management University in 2007.

Ms Yeo Shann Wei, of 51 Cuppage Road, #10-04, Singapore 229469, is the principal Finance Manager of the Fund and Vice President of our Finance & Fund Administration Division.

Ms Yeo joined AIM in August 2012 and was Vice President, Finance & Fund Administration where she was, among other things, in charge of the day-to-day financial operations, financial and statutory reporting as well as the submission of various regulatory returns for both AIM and GIL.

Prior to joining AIM, she was a Vice President, Finance, of Mapletree Investments Pte Ltd, where she was involved in the financial and management reporting of a business unit and in system implementation. Before that, she was a finance manager for a closed-end real estate fund in ING Real Estate Investment Management Pte Ltd from October 2006 to October 2008. She started her career at KPMG as an auditor before joining PSA Corporation Limited as an accountant.

Ms Yeo holds a Bachelor of Accountancy (Honours) degree from the Nanyang Technological University, Singapore and is a non-practising member of the Institute of Singapore Chartered Accountants.

The past performance of the key executives is not necessarily indicative of their future performance.

3. The Trustee

The Trustee of the Fund is HSBC Institutional Trust Services (Singapore) Limited whose registered address is at 21 Collyer Quay, #13-02 HSBC Building, Singapore 049320. The Trustee was incorporated in Singapore on 24 February 1949. As at 22 August 2016, it has an issued capital of S\$10,300,000, consisting of 1,030,000 ordinary shares of S\$10.00 each, and a paid-up capital of S\$5,150,000. The Trustee is regulated in Singapore by the Authority.

The Trustee is responsible for, among other things, keeping and maintaining the register of Holders (the "**Register**") and the safe custody of the Deposited Property of the Fund.

The Trustee does not have any material conflict of interest with its position as trustee of the Fund. Please refer to paragraph 20 for more information on conflicts of interest.

Under and subject to the terms of the Deed, the Trustee is entitled (for the purpose of indemnity against any actions, costs, claims, damages, expenses or demands to which it may be put as Trustee) to have recourse to the assets of the Fund.

Please refer to the Deed for details on the Trustee's role and responsibilities.

4. The Custodian

The custodian of the Fund (“**Custodian**”) is The Hongkong and Shanghai Banking Corporation Limited. It was incorporated in Hong Kong on 14 August 1866 and its registered office is at 1 Queen's Road Central, Hong Kong.

The Custodian was established and has been based in Hong Kong since 1865 and is a wholly owned subsidiary of HSBC Holdings plc, the holding company of the HSBC Group. It is regulated by the Hong Kong Monetary Authority and the Securities and Futures Commission of Hong Kong.

As at 23 August 2016, the issued and fully paid-up ordinary share capital of the Custodian is HK\$114,358,729,495 comprising 45,743,491,798 ordinary shares of HK\$2.50 each and the issued and fully paid-up preference share capital is US\$3,453,000,000 comprising 3,253,000,000 non-cumulative irredeemable preference shares of US\$1.00 each and 200,000,000 cumulative irredeemable preference shares of US\$1.00 each.

The Trustee has appointed the Custodian as the global custodian to provide custodial services to the Fund globally. The Custodian is entitled to appoint sub-custodians to perform any of the Custodian's duties in specific jurisdictions where the Fund invests.

The Custodian is a global custodian with direct market access in certain jurisdictions. In respect of markets for which it uses the services of selected sub-custodians, the Custodian will act in good faith and use reasonable care in the selection and monitoring of its selected sub-custodians.

The criteria upon which a sub-custodian is appointed is pursuant to all relevant governing laws and regulations and subject to satisfying all requirements of the Custodian in its capacity as global custodian. Such criteria may be subject to change from time to time and may include factors such as the financial strength, reputation in the market, systems capability, operational and technical expertise. All sub-custodians appointed will be licensed and regulated under applicable law to carry out the relevant financial activities in the relevant jurisdiction.

The Custodian will remain as custodian of the Fund until its appointment is terminated in accordance with the terms of its appointment.

5. The Register of Holders

The registrar of the Fund is the Trustee and the Register is kept and maintained at 20 Pasir Panjang Road (East Lobby), #12-21 Mapletree Business City, Singapore 117439. The Register is accessible to the Holders during normal business hours subject to such reasonable restrictions as the registrar may impose. The Trustee may appoint any other party (including, without limitation, the Managers) to carry out and administer the Trustee's duties in relation to keeping and maintaining the Register.

The Register is conclusive evidence of the number of Units held by each Holder and the details in the Register will prevail in the event of any discrepancy between the entries in the Register and the details appearing on any statement of holding, unless the Holder proves to the satisfaction of the Trustee and us that the Register is incorrect.

For so long as the Units are listed, quoted and traded on the SGX-ST, the Trustee will procure that the CDP maintains a record of the depositors having Units credited into their respective Securities Accounts. This record is made available to us.

The Administrator

The administrator of the Fund is HSBC Institutional Trust Services (Singapore) Limited, whose registered office is at 21 Collyer Quay, #13-02 HSBC Building, Singapore 049320.

6. The Auditors

The auditors of the accounts relating to the Fund are PricewaterhouseCoopers LLP (the "**Auditors**"), whose registered address is at 8 Cross Street, #17-00 PWC Building, Singapore 048424.

7. Investment Objective, Focus and Approach

Investment Objective

- 7.1 The main objective of the Fund is to achieve medium to long-term capital appreciation by investing in the component securities of the Straits Times Index (which securities are listed on the SGX-ST). There is no target industry or sector. The Fund will track the respective weightings of the component securities of the Straits Times Index.

The Index

- 7.2 The Straits Times Index is the index calculated by FTSE International Limited ("**FTSE**") in conjunction with SPH Data Services Pte Ltd and data from SGX-ST (such parties, together with The London Stock Exchange Plc, The Financial Times Limited and Singapore Press Holdings Ltd, are referred to as the "**Index Sponsors**") to provide a benchmark index representing the performance of **the top 30 companies listed on the SGX-ST ranked by market capitalisation.**
- 7.3 As at 29 September 2016, the 10 largest constituents of the Straits Times Index are as follows:

	Company	Net market capitalisation (in billions of Singapore dollars)	Index weight (%)
(1)	Singapore Telecommunications Limited	63.93	11.74
(2)	Oversea-Chinese Banking	36.30	11.45

Corporation

(3) DBS Group Holdings Limited	38.84	11.01
(4) United Overseas Bank Limited	30.38	9.10
(5) Jardine Matheson Holdings Limited	58.93	6.82
(6) Hongkong Land Holdings Limited	22.56	4.5
(7) Thai Beverage PCL	24.61	3.83
(8) Capitaland Limited	13.61	3.26
(9) Keppel Corporation Limited	9.78	3.09
(10) Wilmar International Limited	20.53	2.71

Please note that the composition and the respective weightings of the component securities of the Straits Times Index may change from time to time. You should consider the risks associated with the use of the Straits Times Index as set out in paragraph 9.2.

- 7.4** The Index Sponsors determine the composition of the Straits Times Index in accordance with their rules and procedures (which may change from time to time), and publish information regarding the composition, investment characteristics and return of the Straits Times Index. The latest information on the Straits Times Index including the index methodology may be obtained from www.ftse.com. None of the Index Sponsors are related to us.

Investment Focus and Approach

- 7.5** A full replication strategy or similar strategy is intended to be employed for the Fund. In other words, generally all or substantially all of the Fund's assets will be invested in the constituent securities of the Straits Times Index, broadly in proportion to the respective weightings of the constituent securities in the index.
- 7.6** While the Fund will aim to follow the Straits Times Index as closely as possible, the Fund's performance will not be able to match exactly the performance of the Straits Times Index. Various circumstances may make it impossible or impracticable to purchase each component security with the same weightings and other investment techniques to track the index may be employed. As the constituents of the Straits Times Index changes over time, the Fund's portfolio of investment will be rebalanced and this may include selling securities that are represented in the index, or purchase securities that are not yet represented in the index, in anticipation of their removal from or addition to the index (as the case may be).
- 7.7** As at 29 September 2016, the 10 largest investments of the Fund (including 5 of which value is greater than 5% of the Fund's Value) are as follows:

	Security	Number of shares held by the Fund	Market value of shares	Percentage of market value over Value of the Fund
(1)	Singapore Telecommunications Limited	1,272,090	5,113,801.80	11.92%

(2) Oversea-Chinese Banking Corporation	573,143	4,974,881.24	11.59%
(3) DBS Group Holdings Limited	310,266	4,802,917.68	11.19%
(4) United Overseas Bank Limited	209,097	3,964,479.12	9.24%
(5) Jardine Matheson Holdings Limited	26,200	2,170,449.20	5.06%
(6) Hongkong Land Holdings Limited	204,000	1,959,907.05	4.57%
(7) Thai Beverage PCL	1,698,600	1,664,628.00	3.88%
(8) Capitaland Limited	441,000	1,420,020.00	3.31%
(9) Keppel Corporation Limited	248,750	1,348,225.00	3.14%
(10) Wilmar International Limited	361,500	1,164,030.00	2.71%

Authorised Investments

7.8 Subject to the Code, the Fund is authorised to invest in the following authorised investments ("**Authorised Investments**"):

7.8.1 any Investment (as defined in the Deed) in or over the component securities of the Straits Times Index (including but not limited to instruments used in tracking the Straits Times Index), subject always to the investment restrictions as set out in paragraph 24; and

7.8.2 for hedging and/or efficient portfolio management purposes only, any foreign exchange transactions.

We do not intend to use financial derivatives in our management of the Fund and do not carry out securities lending and repurchase transaction for the Fund. In addition, there is currently no intention to invest the assets of the Fund in commodities, unlisted equity or debt securities or precious metals.

7.9 An Investment (as defined in the Deed) which may be selected by us for the purpose of investment does not require the Trustee's prior approval or consent so long as such Investment falls within the definition of an Authorised Investment as set out above.

7.10 The Deed further provides that, subject to Clause 16(C) of the Deed, any requisite consents from the competent authorities, any borrowing limits set out in the Code and any statutory requirements for the time being in force, the Trustee will at any time as we may from time to time request, make and vary arrangements for the borrowing by the Trustee for the account of the Fund, of any currency, for the purposes of meeting redemptions and short term (not more than 1 month) bridging requirements including, without limitation, the purpose of enabling us to acquire Authorised Investments for the account of the Fund. The terms and conditions of any borrowing are subject to determination by the Trustee with our written approval and to certain limitations set out in the Deed and the Code, such as the requirement that borrowings, taken together with any collateral (in the form of cash) obtained from any securities lending transaction pursuant to Clause 15(E) of the Deed.

7.11 Product Suitability

The Fund is only suitable for investors who:

- 7.11.1 seek medium to long term capital appreciation;
- 7.11.2 seek an investment that tracks the component securities of the Straits Times Index;
- 7.11.3 believe that the Straits Times Index will increase in value; and
- 7.11.4 are comfortable with the volatility and risks of an equity fund.

8. Fees and Charges

Fees payable by a Holder ⁽¹⁾	
Preliminary charge:	Currently 2%; maximum 5%.
Realisation charge:	Currently nil; maximum 2%.

- (1) Please refer to your brokers for the fees and charges payable by you if you deal or trade in the Units on the SGX-ST. This may include clearing fees and trading fees of the SGX-ST and the brokerage fees and charges of the broker.

Fees payable by the Fund to the Managers, the Trustee and other parties	
Annual management fee: (payable to the Managers)	Currently 0.625% p.a.; maximum 1% p.a.
Annual trustee fee: (payable to the Trustee)	Currently up to 0.07% p.a.; maximum 0.1% p.a. Subject always to a minimum of S\$20,000 p.a.
Registrar fee: (payable to the Trustee)	S\$15,000 p.a. plus transaction based fees (at normal commercial rates) and reimbursement of out-of-pocket expenses
Audit fee ⁽²⁾ (payable to the Auditors), custodian fee ⁽³⁾ (payable to the Custodian), transaction costs ⁽⁴⁾ and other fees and charges ⁽⁵⁾	Subject to agreement with the relevant parties. Each fee or charge may amount to or exceed 0.1% p.a., depending on the proportion that each fee or charge bears to the Value of the Fund.

- (2) The audit fee is subject to agreement with the Auditors for the relevant financial year. Based on the audited accounts and the average Value of the Fund for the financial year ended 30 June 2016, the audit fee did not amount to or exceed 0.1% in that financial year.

- (3) The custodian fee payable is subject to agreement with the Custodian and will depend on the number of transactions carried out and the place at which such transactions are effected in relation to the Fund. Based on the audited accounts and the average Value of the Fund for the financial year ended 30 June 2016, the custodian fee did not amount to or exceed 0.1% in that financial year.
- (4) Transaction costs include all expenses relating to the purchase and sale of financial instruments. Based on the audited accounts and the average Value of the Fund for the financial year ended 30 June 2016, the transaction costs did not amount to or exceed 0.1% in that financial year.
- (5) Other fees and charges include professional fees, goods and services tax and other out-of-pocket expenses. Based on the audited accounts and the average Value of the Fund for the financial year ended 30 June 2016, the other fees and charges amounted to 0.21% in that financial year.

8.1 As required by the Code, all marketing, promotional and advertising expenses in relation to the Fund will be borne by us and not charged to or borne by the Deposited Property of the Fund.

8.2 Any Preliminary Charge and Realisation Charge will be retained by us for our own benefit, and will not form part of the Deposited Property of the Fund. We may pay a fee or commission to the Distributing Agents to sell or procure the Units to be sold. Any commission, remuneration or other sum payable to agents in respect of the issue or sale of any Units will be paid by us. Please note that the Distributing Agents may (depending on the specific nature of services provided) impose other fees and charges that are not disclosed in this Prospectus, and you should check with the relevant Distributing Agent on such fees and charges, if any.

8.3 We may at any time differentiate between investors as to the amount of the Preliminary Charge, Realisation Charge and other charges (if any) payable to us upon the issue or realisation of Units of the Fund, or allow discounts on such basis and to such extent as we may think fit (such discounts will not be borne by the Fund), or to waive such fees and charges.

9. Risks

9.1 General risks

You should consider and satisfy yourselves as to the risks of investing in the Fund. Generally, some of the risk factors that should be considered by you are market, derivatives, liquidity, political, currency and investment risks.

An investment in the Fund is meant to produce returns over the medium to long-term. You should not expect to obtain short-term gains from such investment.

You should note that the value of Units, and the income accruing to the Units, may fall or rise and that you may not get back your original investment. There is no guarantee that the investment objectives of the Fund will be achieved.

9.2 Risks associated with an index trading fund

The information on the Straits Times Index has been extracted from publicly available documents that have not been prepared or independently verified by us or the Trustee in connection with the offer and listing of Units and neither of us makes any representation as to or takes any responsibility for the accuracy or completeness of the information. The information on the Straits Times Index may be changed by the Index Sponsors from time to time.

9.2.1 Concentration risk

The Straits Times Index is concentrated on the SGX-ST and accordingly, the Singapore market. Changes in the financial condition and changes in economic or political conditions that affect a particular issuer or the SGX-ST can affect the value of the issuer's securities or of the securities that are being traded on the SGX-ST. Any change to the value of such securities may affect the value of Units.

9.2.2 Composition of Index

Indices are not actively managed and the selection of the component indices, assets or securities will be made in accordance with the relevant index composition rules and eligibility criteria and by reference to performance criteria or performance outlook. Accordingly, the composition of an index is not designed to follow recommendations or research reports issued by the index provider / sponsor or any other person. No index provider / sponsor has any obligation to take the needs of the Fund or the investors of the Fund into consideration in determining, composing or calculating the relevant index.

The Units are not in any way sponsored, endorsed, sold or promoted by the Index Sponsors. The Index Sponsors make no warranty or representation whatsoever, either expressly or impliedly, either as to the results to be obtained from the Straits Times Index and/or the figure at which the Straits Times Index stands at any particular time on any particular day or otherwise.

The Index Sponsors further do not warrant nor represent nor guarantee to any broker or Holder or any member of the public as to the accuracy or completeness of the Straits Times Index and its computation or any information related thereto. No warranty or representation or guarantee of any kind whatsoever relating to the Straits Times Index or the Units is given by the Index Sponsors. The Units are not issued, endorsed, sold or promoted by the Index Sponsors and the Index Sponsors bear no liability in connection with the administration, marketing or trading of the Units.

The Straits Times Index is calculated by FTSE. The accuracy and completeness of the computation may be affected by, without limitation, the availability and accuracy of prices for constituent securities, market forces and errors in its compilation. The Index Sponsors accept no liability (whether in negligence or otherwise) towards any person for any error in the Straits Times Index and will not be under any obligation to advise any person of any error. The compilation or composition of the Straits Times Index or the constituent stocks and factors may be altered or changed by the Index Sponsors without notice.

Singapore Press Holdings Ltd is entitled to all relevant intellectual property rights in the Straits Times Index.

9.2.3 **Passive Investment**

The Fund is not actively managed. Accordingly, the Fund may be affected by a decline in the market segments that affect the Straits Times Index. Since the Fund will track the respective weightings of the component securities of the Straits Times Index, adverse changes in the financial condition or share performance of any company included in the Straits Times Index may not result in the sale of the shares of such company, and such adverse changes will likely adversely affect the Fund's Value. We do not attempt to select stocks individually or to take defensive positions in declining markets. We may lack the discretion to adapt to market changes. ***A fall in the Straits Times Index may result in a corresponding fall in the Value of the Fund.***

9.2.4 **Use of the Straits Times Index**

We have been granted a licence by FTSE to use the Straits Times Index in connection with the issue, operation, marketing and promotion of the Fund. The Fund may be terminated if the index licence agreement is terminated or the Straits Times Index is no longer available for benchmarking and we are unable to identify or agree with FTSE or any other index provider terms for the use of a suitable replacement index that uses, in our opinion, the same or substantially similar formula for the method of calculation as the Straits Times Index. Any such replacement index will be notified to Holders. Accordingly, please note that the ability of the Fund to track the Straits Times Index depends on the continuation in force of the index licence agreement in respect of the Straits Times Index or a suitable replacement.

During the transition period when a replacement index is not available, we will continue to manage the Fund's portfolio in a manner consistent with the passive style of an index-tracking fund and in accordance with the methodology of the Straits Times Index to the extent that we are able to determine.

9.2.5 Tracking Error Risk

There is no assurance that the Fund will be able to fully track the performance of the Straits Times Index.

“**Tracking error**” is the difference between the performance of a fund’s portfolio and that of its underlying index. The Value of the Fund may not correlate exactly with the Straits Times Index and changes in the Value of the Fund are unlikely to replicate exactly changes in the Straits Times Index. Factors such as the fees, costs and expenses of the Fund, imperfect correlation between the Fund’s assets and the securities constituting the Straits Times Index, rounding of share prices, changes to the Straits Times Index, regulatory policies, investment and regulatory constraints, foreign currency valuation, unexpected financing costs in the event of severe market movements, inability to rebalance in response to changes in the Straits Times Index and the existence of a cash position held by the Fund may affect our ability to achieve close correlation with the performance of the Straits Times Index. The Fund’s returns may therefore deviate from the Straits Times Index resulting in a tracking error. However, such tracking errors are not expected to be significant. As far as possible, we will seek to minimise tracking errors by minimising the cash holdings of the Fund.

9.3 Other risks

9.3.1 Market risk

The usual risks of investing and participating in securities apply. Issuers whose securities make up the Straits Times Index may have businesses and operations in various markets. Prices of such securities may go up or down in response to changes in economic conditions, interest rates, and the relevant market’s perception of such securities. These may cause the price of Units to go up or down as the price of Units is based on the current market value of the investments of the Fund.

9.3.2 Equity risk

The Fund invests in stocks and other equity securities which are subject to market risks that historically have resulted in greater price volatility than experienced by bonds and other fixed income securities. This in turn may affect the Value or volatility of the Fund.

9.3.3 Political risk

Global political situations may have an impact on companies in the Asian region. This may affect the value of the securities of companies involved, which may in turn impact on the value of the Units.

9.3.4 Foreign exchange / currency risk

The Straits Times Index is computed in Singapore Dollars but some of its component securities are quoted in foreign currencies. The Value of the Fund will therefore be affected by fluctuations of the exchange rates of foreign currencies against the Singapore Dollar. Additionally, the Fund will invest in companies with foreign currency earnings. There is therefore the risk that any fluctuations in these foreign currencies may also affect the income, the valuation of the assets of the Fund and the gains and losses realised upon the sale of assets. We may, if we deem fit, employ currency hedging techniques to manage the impact of foreign currency fluctuations on the Fund. However, we do not currently intend to hedge against foreign currency fluctuations.

9.3.5 Investment risk

An investment in unit trusts is subject to investment risks, including possible loss of the principal amount invested.

9.3.6 Liquidity risk

Some of the securities that the Fund may invest in may have limited liquidity and may therefore affect the Fund's ability to acquire or dispose of such securities at the time and price it desires.

9.3.7 Operating cost

There is no assurance that the performance of the Fund will achieve its investment objective. The level of fees and expenses payable by the Fund will fluctuate in relation to its Value. Although the amounts of certain ordinary expenses of the Fund can be estimated, the growth rate of the Fund, and hence its Value, cannot be anticipated. Please also note that we and the Trustee have the discretion to increase our respective fees up to the maximum level as provided in paragraph 8. The expenses of the Fund (such as, legal, audit and other professional fees) may also increase from time to time in line with market conditions. Accordingly, no assurance can be given as to the performance of the Fund or the actual level of its expenses.

9.3.8 Actions of institutional investors

We may accept subscriptions from institutional investors and such subscriptions may constitute a large portion of the total investments in the Fund. Whilst these institutional investors will not have any control over our investment decisions, the actions of such investors may have a material effect on the Fund. For example, substantial realisations of Units by an institutional investor over a short period of time could necessitate the liquidation of the Fund's assets at a time and in a manner which does not provide the most economic advantage to the Fund and which could therefore adversely affect the value of the Fund's assets.

9.3.9 Risk of exceptional market conditions

Under certain market conditions, it may be difficult or impossible to liquidate or rebalance positions. For example, this may occur during volatile markets or crisis situations or where trading under the rules of the relevant stock exchange is suspended, restricted or otherwise impaired. During such times, the Fund may be unable to dispose of certain assets due to thin trading or lack of a market or buyers. Placing a stop-loss order may not necessarily limit a Fund's losses to intended amounts as market conditions may make it impossible to execute such an order at the ideal price. In addition, such circumstances may force the Fund to dispose of assets at reduced prices, thereby adversely affecting the Fund's performance. Further, such investments may be difficult to value with any degree of accuracy or certainty. The dumping of securities in the market could further deflate prices. If the Fund incurs substantial trading losses, the need for liquidity could rise sharply at the same time that access to liquidity is impaired. Additionally, in a market downturn, the Fund's counterparties' financial conditions could be weakened, thereby increasing the Fund's credit risk.

9.3.10 Trading in Units on the SGX-ST

(a) Trading may be suspended and Units may be delisted

You will not be able to purchase or sell Units on the SGX-ST during any period when trading in the Units is suspended by the SGX-ST. The SGX-ST may suspend the trading of Units whenever the SGX-ST determines that it is appropriate in the interests of a fair and orderly market to protect investors. The creation and realisation of Units may also be suspended in the event that the trading of Units on the SGX-ST is suspended.

The SGX-ST imposes certain requirements for the continued listing of securities, including the Units, on the SGX-ST. There is no assurance that the Fund will continue to meet the requirements necessary to maintain the listing of Units on the SGX-ST or that the SGX-ST will not change the listing requirements. The Fund may be terminated if Units are delisted from the SGX-ST.

Dealings of Units on the SGX-ST may not necessarily be suspended in the event that the issue and realisation of Units is temporarily suspended by us or the Trustee in accordance with the terms of the Deed. If the issue and realisation of Units is temporarily suspended, the trading price of the Units may be adversely affected and may differ from the Value of the Fund.

(b) Units may trade at prices other than Value

The Value per Unit of the Fund represents the fair price for buying or selling Units. As with any listed fund, the secondary market price of Units may sometimes trade above or below this Value per Unit. The deviation from this Value is dependent on a number of factors but will be accentuated when there is a large imbalance between market supply and demand for Units on the SGX-ST. There is a risk,

therefore, that Holders may not be able to buy or sell Units listed on the SGX-ST at a price close to the Value per Unit of the Fund. The "bid/ask" spread (being the difference between the prices being bid by potential purchasers and the prices being asked by potential sellers) is another source of deviation from this Value per Unit. The bid/ask spread can widen during periods of market volatility or market uncertainty, thereby increasing the deviation from this Value per Unit.

(c) Trading and realisation of Units

Not all Units issued are listed on the SGX-ST. Unlisted Units will have to be realised by us in accordance with the realisation provisions under paragraph 12.

Please be aware that there may be no liquid trading market for Units which are listed on the SGX-ST. There can be no assurance that active trading markets for such Units will develop, nor is there a certain basis for predicting the actual price levels at, or sizes in, which Units may trade. If you are unable to sell your Units on the SGX-ST, you may apply to have your Units transferred out of your Securities Account and realised by us.

9.3.11 Broker risk

We may engage the services of third party securities brokers and dealers to acquire or dispose the investments of the Fund and to clear and settle its exchange traded securities trades. In selecting brokers and dealers and in negotiating any commission involved in its transactions, we consider, amongst other things, the range and quality of the professional services provided by such brokers and dealers, the credit standing of such brokers and dealers, and the licensing or regulatory status of such brokers and dealers.

It is possible that the brokers or dealers with which the Fund do business may encounter financial difficulties that may impair the operational capabilities of the Fund. In the event that one of these brokers or dealers were to fail or become insolvent, there is a risk that the Fund's orders may not be transmitted or executed and its outstanding trades made through the broker or dealer may not be settled.

9.3.12 Counterparty risk

Where the Fund enters into over-the-counter transactions, the Fund is exposed to the risk that a counterparty may default on its obligations to perform under the relevant contract. In the event of a bankruptcy or insolvency of a counterparty, the Fund could experience delays in liquidating an investment and may therefore incur significant losses, including losses resulting from a decline in the value of the investment during the period in which the Fund seeks to enforce its rights. The Fund may also be unable to realise any gains on the investment during such period and may incur fees and expenses to enforce its rights. There is also a possibility that the contracts may be terminated due to, for instance, bankruptcy, supervening illegality or change in the tax or accounting laws relative to those laws existing at the time the agreement was entered into.

The above should not be considered to be an exhaustive list of the risks which you should consider before investing in the Fund. Please be aware that an investment in the Fund may be exposed to other risks of an exceptional nature from time to time.

10. Listing on SGX-ST

The Fund was admitted to the Official List of the SGX-ST on 20 December 1996.

Units credited into a Securities Account may be traded on SGX-ST via the CDP's electronic book-entry (scripless) clearance and settlement system on the basis of a price between a willing seller and a willing buyer. For the purpose of trading on the SGX-ST, a board lot for the Units will comprise 100 units. Units credited into a Securities Account may also be transferred to any other Securities Account with the CDP subject to a transfer fee payable to CDP and the terms and conditions of the operation of the Securities Account.

Units credited into a Securities Account may also be realised through us after such Units have been transferred out of the Securities Account of the Holder by the completion of the necessary transfer forms available from the branches/offices of the Distributing Agents. Any individual Holder wishing to transfer S\$1,000,000 or more of Units for the purpose of realisation will be required to attend personally at the CDP to have his signature verified before proceeding with the transfer and realisation. Any direct corporate Holder wishing to transfer any number of Units will be required to have its authorised signatory attend personally at a broker, a depository agent or the CDP to have his signature verified before proceeding with the transfer and realisation.

All persons trading in the Units through the SGX-ST should ensure that the relevant Units have been credited into their Securities Accounts, prior to trading in such Units, since no assurance can be given that the Units can be credited into the Securities Accounts in time for settlement following a dealing. If the Units have not been credited into the Securities Accounts by the due date for settlement of the trade, the buy-in procedures of the SGX-ST will be implemented.

Other terms and conditions may be imposed by the CDP in respect of the operation of the Securities Accounts. You should check with the CDP for details or if you have any doubt or uncertainty.

11. Subscription of Units

11.1 Subscription procedure

Applications for Units may be made by way of printed application form through the Distributing Agents from time to time, or any other sales channels, if applicable.

You may submit one or more applications for Units and joint applications by two applicants may be accepted. Each application will be subject to the terms and conditions of the Deed. Care must be taken to follow the notes printed on the reverse of the application form and

in this Prospectus. Applications which do not comply with the notes or which are illegible, incomplete, incorrectly completed or which are accompanied by improperly drawn remittances may be rejected.

The acceptance or non-acceptance of applications for Units will, subject to the Deed, be at our absolute discretion acting in consultation with the Trustee. We reserve the right to issue fewer Units than the number applied for without assigning any reason.

Applications will not be accepted from any undischarged bankrupts, sole proprietorships, partnerships, non-corporate bodies and any person under the age of 18 years except if the application is made with a joint applicant of 18 years and above.

Applications should be accompanied by such documents as may be required, with the subscription monies in full, failing which we reserve the right to reject the relevant application. In particular, an application by a corporation must be accompanied by a copy of its Memorandum and Articles of Association, relevant corporate resolutions, a list of authorised signatories and their respective specimen signatures.

Each application must be accompanied by a remittance in Singapore currency for the full amount payable in respect of the Units applied for, by way of instruction to debit the applicant's bank account with any of the relevant Distributing Agents who are banks or by crossed cheque, cashier's order or banker's draft made payable to "Singapore Consortium Investment Management Limited" or by cash (which must be made in person at any branch of the Distributing Agents who are banks).

If you wish to make payment by telegraphic transfer, you should contact us for details regarding such form of payment. All bank charges incurred in respect of a telegraphic transfer will be borne by you.

You have a choice of paying for Units with cash or Supplementary Retirement Scheme ("**SRS**") monies. If you wish to use your SRS monies to purchase Units, you should indicate this on the relevant application form which contains your instructions to the SRS operator bank to withdraw from your account the subscription monies in respect of Units applied for. No transfer is permitted in respect of Units purchased by a Holder with SRS monies.

You may apply for Units to be held outside the CDP, in which case Units issued will be registered in the Register. You may also, when applying for Units, request that we credit your Units into your Securities Account.

Unaccepted applications will be returned to the applicant by ordinary post at the risk of the applicant within 10 Business Days of the application. Unsuccessful applicants will have their application moneys returned within 10 Business Days after their applications are received by cheque or such other means, by post at the applicants' risk at the same time as the returned application. All application moneys will be returned without any interest or any other connected benefit.

11.2 Tax residency disclosure

You will be required to state on the application form whether your tax residency status is Singapore. Under the Income Tax Act, a Singapore tax resident is:

- (a) in relation to an individual, a person who, in the year preceding the year of assessment, resides in Singapore except for such temporary absences during that period as may be reasonable and not inconsistent with a claim by such person to be resident in Singapore, and includes a person who is physically present or who exercises an employment (other than as a director of a company) in Singapore for 183 days or more during the year preceding the year of assessment; and
- (b) in relation to a company or body of persons, a company or body of persons the control and management of whose business is exercised in Singapore.

11.3 Minimum Initial Subscription and Minimum Subsequent Subscription

Minimum Initial Subscription	Minimum Subsequent Subscription
S\$1,000	S\$1,000

Please note that the Distributing Agents may impose a higher minimum initial or subsequent subscription amount. You should therefore check with the relevant Distributing Agent before submitting your application for subscriptions.

11.4 Dealing deadline and pricing basis

11.4.1 The Units were offered at an initial issue price of S\$1.00 for each Unit (including a Preliminary Charge of 3 cents for each Unit), during the initial launch period which commenced on 18 November 1996 and ended on 18 December 1996.

11.4.2 Subsequent to the initial launch period, the issue price is determined on a forward pricing basis. As such, the issue price of Units will not be ascertainable at the time of application.

In buying Units, you pay a fixed amount of money e.g., S\$1,000, which will buy you the number of Units² obtained from dividing that sum by the issue price when it has been ascertained later.

The dealing deadline is 3.00 p.m. Singapore time on a Dealing Day³. Units in respect of applications received and accepted by us before 3.00 p.m. Singapore

² Under the provisions of the Deed, no fractions of a Unit will be issued and in issuing such number of Units as correspond to the relevant subscription proceeds, we will truncate but not round off to the nearest whole Unit and the Fund will retain any balance arising from such truncation.

³ A "Dealing Day" in connection with the issuance, cancellation, valuation and realisation of units, means every Business Day or such Business Day or Business Days at such intervals as we may from time to time determine and reasonable notice of any such determination will be given by us to

time on a Dealing Day will be issued at that Dealing Day's issue price calculated in accordance with paragraph 11.4.3.

For applications received after 3.00 p.m. Singapore time on a Dealing Day or on a day which is not a Dealing Day will be treated as having been received on the next Dealing Day.

11.4.3 The issue price of a Unit will be ascertained (a) by calculating the Value (calculated as set out in paragraph 23.3) of the proportion of the Deposited Property of the Fund representing one Unit at the Valuation Point⁴ in respect of the Dealing Day on which such issue occurs; and (b) by adding to it the Preliminary Charge. The resultant figure will be determined up to 4 decimal places. The amount of any adjustment resulting from such determination will be retained by the Fund.

11.5 Numerical example of how Units are allotted:

Units are allotted on a dual pricing system. The number of Units allotted for an investment of S\$1,000 based on a notional issue price of S\$1.0200 is calculated as follows:

S\$1,000	/	S\$1.0200	=	980 Units
Investment amount		Issue price (including 2% preliminary charge)		Number of Units allotted

The above example is hypothetical and is not indicative of the issue price on any Dealing Day or of the future or likely performance of the Fund.

11.6 Confirmation of purchase

A confirmation note detailing the investment amount and the number of Units allocated to you will be sent within 10 Business Days for cash applications, and within 11 Business Days for SRS applications, from the date of issue of the Units.

If you wish to have the Units credited into your Securities Account, a notification will be sent by the CDP, indicating the number of Units which have been credited into your Securities Account. It is expected that the Units will be credited to your Securities Accounts within 10 market days after the date of application for the Units.

No certificate for the Units will be issued to you.

all Holders at such time and in such manner as the Trustee may approve. A "**Business Day**" means a day (other than Saturday, Sunday or a gazetted public holiday) on which commercial banks are open for business in Singapore and the SGX-ST is open for trading.

⁴ "**Valuation Point**" means the close of business of the last relevant market to close on a Dealing Day or such other day as we with the approval of the Trustee may from time to time determine and we will notify the Holders of such change if required by the Trustee.

11.7 Minimum fund size

In order for the Fund to remain viable, its size must be sufficient to cover at least its fixed operating costs. As provided under paragraph 23.6.3(a), we may terminate the Fund if at any time on or after five years from the date of the Deed, the aggregate Value of the Deposited Property is less than S\$5 million.

12. Realisation of Units

12.1 Realisation procedure

You may realise your Units on any Dealing Day by submitting a realisation request to us through the relevant Distributing Agent through whom the Units were originally purchased. You may realise your Units in full or partially, subject to paragraph 12.2.

You should indicate on the realisation form whether the Units to be realised are to be debited from your Securities Account or from the Register.

If your Units were not credited into a Securities Account with the CDP and your realisation request is accepted, you will receive payment by cheque with a confirmation note from us indicating the confirmed realisation price and the amount of sale proceeds.

If your Units were credited into a Securities Account with the CDP, you must have your Units transferred out of your Securities Account before your Units are realised by us, and if your realisation request is accepted, you will receive payment by cheque with a payment advice from the CDP or any other method as may be imposed by the CDP.

12.2 Minimum holding and minimum realisation amount

You must maintain a holding of at least one whole Unit.

The minimum realisation amount is 1,000 Units.

Please note that the Distributing Agents may impose a higher minimum holding or minimum realisation amount. You should therefore check with the relevant Distributing Agents before submitting your realisation requests.

12.3 Dealing deadline and pricing basis

12.3.1 Units in respect of realisation requests received and accepted by us by 3.00 p.m. Singapore time on a Dealing Day will be realised at that Dealing Day's realisation price calculated in accordance with paragraph 12.3.2. Realisation requests received and accepted by us after 3.00 p.m. on a Dealing Day or on a day which is not a Dealing Day will be treated as having been received on the next Dealing Day.

As Units are realised on a forward pricing basis, the realisation price will not be ascertainable at the time of receipt by us of the realisation form.

12.3.2 The realisation price of a Unit will, subject to the provisions of the Deed, be ascertained by (a) calculating the Value (calculated as set out in paragraph 23.3) of the proportion of the Deposited Property of the Fund representing one Unit as at the Valuation Point in respect of the Dealing Day on which the realisation request is received; and (b) by deducting from it the realisation charge (if any). The resultant figure will be determined up to 4 decimal places. The amount of any adjustment resulting from such determination will be retained by the Fund.

12.3.3 If you are resident outside Singapore, we will be entitled to deduct from the total amount of realisation proceeds which would otherwise be payable to you on realisation an amount equal to the excess of the expenses actually incurred over the amount of expenses which would have been incurred if you had been resident in Singapore.

12.4 Numerical example of how the amount paid to a Holder is calculated, based on the sale of 1,000 Units and a notional realisation price of S\$1.1500:

1,000 Units	X	S\$1.1500	=	S\$1,150.00
Number of Units		Realisation price*		Realisation proceeds

*There is currently no realisation charge imposed.

The above example is hypothetical and is not indicative of the realisation price on any Dealing Day or of the future or likely performance of the Fund.

12.5 Payment of realisation proceeds

Realisation proceeds will normally be paid by cheque or credited to the Holder's SRS account, as applicable, within 6 Business Days in Singapore (or such other period as may be allowed by the Authority) from the Dealing Day following the receipt and acceptance of the realisation form by us or by the relevant Distributing Agent, unless the realisation of Units has been limited in accordance with paragraph 12.6 or suspended in accordance with paragraph 16. All bank charges incurred in respect of a telegraphic transfer of realisation proceeds to you will be borne by you.

12.6 Limit on realisation

We may, with the approval of the Trustee, limit the total number of Units which Holders may realise and which we are entitled to have cancelled on any Dealing Day to 10% of the total number of Units then in issue (disregarding any Units which have been agreed to be issued), such limitation to be applied pro rata to all Holders who have validly requested realisations on such Dealing Day and us, so that the proportion realised of each holding so requested to be realised or cancelled is the same for the all Holders and us.

Any Units which are not realised or cancelled (as the case may be) will be realised or cancelled (subject to any further application of the provisions of this paragraph) on the next succeeding Dealing Day provided that if on such next succeeding Dealing Day, the total number of Units to be cancelled or realised (as the case may be), including those carried forward from any earlier Dealing Day, exceeds such limit, we may further carry forward the requests for realisation or cancellation (as the case may be) until such time as the total number of Units to be realised or cancelled (as the case may be) on a Dealing Day falls within such limit.

If realisation requests are carried forward as described, we will, within 7 calendar days, give notice to the affected Holders that such Units have not been realised or cancelled and that (subject as described) they will be realised or cancelled on the next succeeding Dealing Day.

13. Compulsory Realisations

13.1 We have the right (in consultation with the Trustee) to compulsorily realise any holdings of Units in the Fund held by:

- (a) any Holder:
 - (i) whose subscription for or holding of Units, in our opinion, is or may be in breach of any applicable law or regulation in any jurisdiction; or
 - (ii) where such realisation is, in our opinion, necessary or desirable for our or the Fund's compliance with any applicable law or regulation in any jurisdiction (including any regulatory exemption conditions); or
- (b) any Holder whose holdings, in our opinion:
 - (i) may cause the Fund to lose its authorised or registered status with any regulatory authority in any jurisdiction; or
 - (ii) may cause the offer of the Units of the Fund, the Fund, this Prospectus, the Deed, the Trustee, or us to become subject to any authorisation, recognition, approval or registration requirements under any law or regulation in any other jurisdiction; or
- (c) any Holder whose holdings, in our opinion:
 - (i) may cause a detrimental effect on the tax status of the Fund in any jurisdiction or on the tax status of the Holders of the Fund; or
 - (ii) may result in the Fund or other Holders of the Fund suffering any other legal or pecuniary or administrative disadvantage which the Fund or Holders might not otherwise have incurred or suffered; or

- (d) any Holder who fails any anti-money laundering, anti-terrorist financing or know-your-client checks, or where information and/or documentary evidence requested by the Trustee and/or us for the purposes of any anti-money laundering, anti-terrorist financing or know-your-client checks cannot be obtained from the Holder (or the Holder has failed to provide the same) in a timely manner; or
- (e) any Holder, where information (including but not limited to information regarding tax status, identity or residency), self-certifications or documents as may be requested by the Trustee and/or us pursuant to laws, regulations, guidelines, directives or contractual obligations with other jurisdictions' authorities (including, without limitation, the FATCA and/or any Singapore laws, regulations, guidelines and directives implemented as part of any IGA entered into between the U.S. and Singapore in connection with FATCA) cannot be obtained from the Holder, or the Holder has failed to provide the same, in a timely manner; or
- (f) any Holder who does not consent, or withdraws his consent, for the Trustee or us to collect, use and/or disclose information or data relating to the Holder, where (in our or the Trustee's opinion) such information or data is necessary or desirable for us, the Trustee, our or its respective related corporations and/or other service providers to perform the respective services and/or duties to or in respect of the Fund and/or the Holder.

Any compulsory realisation under this paragraph may be carried out by us on any Dealing Day, with prior notice to the relevant Holder, and will be carried out in accordance with, and at the realisation price determined under, the applicable provisions on realisations in the Deed.

13.2 If we and/or the Trustee are required to account to any duly empowered fiscal authority of Singapore or elsewhere for any income or other taxes, charges or assessments whatsoever on the value of any Units held by a Holder, we (in consultation with the Trustee) will be entitled, at any time with prior notice to that Holder, to realise such number of Units held by that Holder as may be necessary to discharge the liability arising. We and/or the Trustee (as the case may be) will be entitled to apply the proceeds of such realisation in payment, reimbursement and/or set-off against the liability.

13.3 We, the Trustee and our or its respective delegates, agents or associates will not be liable for any loss (whether direct or consequential and including, without limitation, loss of profit or interest) or damage suffered by any Holder or any party arising out of or caused in whole or in part by any actions which are taken by us, the Trustee and/or any of our or its respective delegates, agents or associates under this paragraph 13.

14. Switching of Units

Currently, you are not permitted to switch your Units for units in any other collective investment schemes.

15. Obtaining Prices of Units

The Fund will be valued on each Dealing Day. The indicative prices of the Units are quoted on a forward pricing basis and are available from the Distributing Agents. They will also be published daily on our website at www.sicim.com.sg, on the Business Times website at http://www.btinvest.com.sg/markets/fund_search, and such other local or foreign modes of publications as we may decide upon. The actual prices quoted will generally be published after the close of business on the Business Day following the relevant Dealing Day in Singapore Dollars.

Please note that the frequency of the publication of the prices is dependent on the publication policies of the publisher concerned. Save for our publications, we do not accept any responsibility for errors on the part of the publisher for the prices published in the newspapers or such other publication or for any non-publication or late publication of prices by such publisher, and will incur no liability in respect of any action taken or loss suffered by you upon such publication, non-publication or late publication by such publisher.

The market prices of Units which are listed on the SGX-ST (which may not be equal to the Value of the Fund) may be obtained from the SGX-ST's website at www.sgx.com.

16. Suspension of Dealing

16.1 Subject to the provisions of the Code and the Deed, we or the Trustee may, with the prior written approval of the other, suspend the issue, realisation, cancellation and valuation of Units during:

16.1.1 any period when the SGX-ST or any other Recognised Stock Exchange is closed (otherwise than for ordinary holidays) or during which dealings are restricted or suspended;

16.1.2 the existence of any state of affairs which, in our opinion might seriously prejudice the interests of the Holders as a whole or of the Deposited Property;

16.1.3 any breakdown in the means of communication normally employed in determining the price of any of such Authorised Investments or the current price thereof on the SGX-ST or any other Recognised Stock Exchange or when for any reason the prices of any of such Authorised Investments cannot be promptly and accurately ascertained (including any period when the fair value of a material portion of the Authorised Investments cannot be determined);

16.1.4 any period when remittance of moneys which will or may be involved in the realisation of such Authorised Investments or in the payment for such Authorised Investments cannot, in our opinion, be carried out at normal rates of exchange;

16.1.5 any 48 hour-period (or such longer period as we and the Trustee may agree) prior to the date of any meeting of Holders (or any adjournment thereof);

16.1.6 any period where dealing of Units is suspended pursuant to any order or direction of the Authority;

16.1.7 any period when our or the Trustee's business operations in relation to the operations of the Fund are substantially interrupted or closed as a result of or arising from pestilence, acts of war, terrorism, insurrection, revolutions, civil unrest, riots, strikes or acts of God;

16.1.8 exceptional circumstances, where we have determined that such suspension is in the best interest of the Holders; or

16.1.9 such other circumstances, as may be required under the provisions of the Code.

16.2 Subject to the provisions of the Code, we and/or the Trustee may from time to time also suspend the issue and/or realisation of Units in certain situations as set out in the Deed.

16.3 Subject to the provisions of the Code, there is no maximum period of suspension under this paragraph 16 and such suspension will take effect forthwith upon the declaration in writing of the suspension to the Trustee by us (or, as the case may be, to us by the Trustee). The suspension will terminate as soon as practicable when the condition giving rise to the suspension has ceased to exist and no other conditions under which suspension is authorised under this paragraph 16 exist, upon the declaration in writing of the termination by us (or, as the case may be, by the Trustee), and in any event, within such period as may be prescribed by the Code. The period of suspension may be extended in accordance with the Code.

17. Performance of the Fund and Benchmark

Past performance, benchmark performance, expense ratio and turnover ratio of the Fund

Inception date: 18 December 1996	1 year (%)	3 years (%)	5 years (%)	10 years (%)	Since inception (%)	Expense ratio (%) ⁽³⁾	Turnover ratio (%) ⁽⁴⁾
(NAV-NAV) ⁽¹⁾	-0.88	0.01	1.80	3.59	3.65	1.04	13.38
(NAV-NAV [^]) ⁽²⁾	-2.86	-0.66	1.39	3.38	3.54		
Benchmark (in SGD): Straits Times Index ⁽⁵⁾	0.52	1.14	2.93	4.35	3.03		

[^] Taking into account the Preliminary Charge.

⁽¹⁾ Calculated in Singapore Dollars on an NAV-to-NAV basis as at 31 August 2016, with all dividends and distributions reinvested (net of reinvestment charges).

Figures for one year show the percentage change, while figures for more than one year show the average annual compounded return.

- (2) Calculated in Singapore Dollars on an NAV-to-NAV basis as at 31 August 2016, taking into account any applicable charges set out in paragraph 8 (i.e. offer-to-bid basis) with all dividends and distributions reinvested (net of reinvestment charges). Figures for one year show the percentage change, while figures for more than one year show the average annual compounded return.
- (3) The expense ratio is calculated in accordance with the requirements in the Investment Management Association of Singapore's guidelines on the disclosure of expense ratios (the "**IMAS Guidelines**") and based on the audited accounts of the Fund for the financial year ended 30 June 2016. The following expenses (where applicable) as set out in the IMAS Guidelines (as may be updated from time to time), are excluded from the calculation of the expense ratio:
- (a) brokerage and other transaction costs associated with the purchase and sales of investments (such as registrar charges and remittance fees);
 - (b) interest expense;
 - (c) foreign exchange gains and losses of the Fund, whether realised or unrealised;
 - (d) front-end loads, back-end loads and other costs arising from the purchase or sale of a foreign unit trust or mutual fund;
 - (e) tax deducted at source or arising from income received, including withholding tax; and
 - (f) dividends and other distributions paid to Holders.
- (4) The turnover ratio for the financial year ended 30 June 2016 is calculated based on the lesser of purchases or sales of the Fund's underlying investments expressed as a percentage of the daily average Value of the Fund.
- (5) The benchmark against which the Fund's performance is measured since 26 January 2001 is the Straits Times Index in total returns. The benchmark performance figures are calculated in Singapore Dollars and on the basis of dividends (if any) reinvested. The benchmark of the Fund since inception up to 23 January 2001 was the Business Times – Singapore Regional Index. The change in benchmark was due to the change in the investment policy of the Fund to track the Straits Times Index instead of the Business Times – Singapore Regional Index.

Please note that the past performance of the Fund is not necessarily indicative of the future performance of the Fund.

18. Soft Dollar Commissions/Arrangements

Subject to the provisions of the Code, we may from time to time, receive or enter into soft-dollar commissions or arrangements in respect of the management of the Fund. We will comply with applicable regulatory and industry standards on soft-dollars. The soft-dollar commissions or arrangements may include specific advice as to the advisability of dealing in, or of the value of any investments, research and advisory services, economic and political analyses, portfolio analyses including valuation and performance measurements, market analyses, data and quotation services, computer hardware and software or any other information facilities to the extent that they are used to support the investment decision making process, the giving of advice, or the conduct of research or analysis, and custodial service in relation to the investments managed for our clients.

Soft-dollar commissions or arrangements received will not include travel, accommodation, entertainment, general administrative goods and services, general office equipment or premises, membership fees, employees' salaries or direct money payment.

We may not accept or enter into soft dollar commissions or arrangements unless: (a) such soft-dollar commissions or arrangements can reasonably be expected to assist us in our management of the Fund; (b) best execution is carried out for the transactions; and (c) no unnecessary trades are entered into in order to qualify for such soft-dollar commissions or arrangements.

We do not, and are not entitled to, retain cash rebates for our own account in respect of rebates earned when transacting in securities for the account of the Fund.

19. Market Timing

The Fund is designed and managed to support medium to long-term investments. In this regard, we take a serious view of, and strongly discourage the practice of market timing (that is, investors conducting short-term buying or selling of Units to gain from inefficiencies in pricing) as such practices may cause an overall detriment to the long-term interest of other investors. In addition, short-term trading in Units increases the total transaction costs of the Fund, such as trading commission and other costs which are absorbed by all other investors. Moreover, the widespread practice of market timing may cause large movements of cash in the Fund which may disrupt the investment strategies to the detriment of long-term investors. For the reasons set out above, we strongly discourage the practice of market timing and may implement internal measures to monitor and control such practice. If any internal measure to restrict the practice of market timing amounts to a significant change to the Fund (as provided in the Code), we will inform Holders of such internal measure not later than one month before its implementation. We intend to review our policy on market timing from time to time in a continuous effort to protect the long-term interests of investors in the Fund.

20. Conflicts of Interest

Should a material conflict of interest arise in relation to the allocation of investments, we and the Directors will use our best efforts to ensure that it is resolved fairly. We, the Directors and our connected persons and the Custodian and its connected persons, will (in relation to the Units that such persons may hold) refrain from voting at, or being part of a quorum for, any meeting to approve any matter in which such person believes it or he has a material interest.

We, the Directors, the Trustee and our or their respective associates (collectively the "**Parties**") are or may be involved in other financial, investment and professional activities which may on occasion cause conflict of interest with the management of the Fund. These include, inter alia, the management of other funds, purchases and sales of securities, investment and management counselling, brokerage services, trustee and custodial services and serving as directors, officers, advisers or agents of other funds or other companies, including companies in which the Fund may invest. Each of the Parties will respectively ensure that the performance of their respective duties will not be impaired by any such involvement that they might have. In the event that a conflict of interest does arise, the Parties will endeavour to ensure that it is resolved fairly and in the interest of Holders.

We are of the view that there is no conflict of interest in managing our other funds (if any) and the Fund because of the following structures in place:

- (a) We are a member of the Investment Management Association of Singapore ("**IMAS**") and subscribe and adhere to the IMAS Code of Ethics and Standards of Professional Conduct. The Code of Ethics and Standards of Professional Conduct are in place to ensure high ethical and professional standards of investment professionals as well as fair treatment of the investing public.
- (b) All investment ideas are shared equally among the portfolio managers.
- (c) Investment decisions for each fund are made impartially. There are no preferred customers or funds and all accounts are treated equally.
- (d) Interests of clients receive priority over the interests of the employees (including the Directors). This will mean satisfying client transactions before dealing for employee accounts and avoiding any conflict between the interests of clients and those of our employees (including the Directors). Where there is a deemed potential conflict of interest, our employees, including the Directors should report immediately to the senior compliance officer as well as an appropriate senior director who will either resolve the potential conflict or ensure proper disclosure to the affected clients.
- (e) Investments are allocated between various funds which place the same orders simultaneously on a pro rata basis as far as possible, taking into account the availability of cash and the relevant investment guidelines of these funds.

- (f) Cross trades between staff personal accounts and client accounts are prohibited. Cross trades between a “house account” controlled by us and a client account are also prohibited, where “house account” means an account owned by us or any of our connected persons over which we can exercise control or influence.

We, our related entities, officers or employees may from time to time invest and deal in Units relating to the Fund for our respective individual accounts or (in our case and our related entities) for the account of another person (including, without limitation, our other clients). If we do so, we will have regard to our obligations to the Fund and, in particular, our obligation to act in the best interests of the Fund and the Holders so far as practicable, having regard to applicable laws and our obligations to our other clients. In the event that a conflict of interest does arise, we will endeavour to ensure that such conflict is resolved fairly.

We, the Directors and our associates are not entitled to receive any part of any brokerage charged to the Fund, or any part of any fee, allowances, benefits, etc. received on purchases charged to the Fund.

We and the Trustee will conduct all transactions for and on behalf of the Fund at arm's length.

Associates of the Trustee may be engaged to provide financial, banking or brokerage services to the Fund or buy, hold and deal in any investments, enter into contracts or other arrangements with the Trustee and make profits from these activities. Such services to the Fund, where provided, and such activities with the Trustee, where entered into, will be on an arm's length basis.

21. Reports

Financial year-end and distribution of reports

The financial year-end for the Fund is 30 June. The annual report, annual audited accounts and the Auditors' report on the annual accounts will be sent or made available to the Holders (by post or by such electronic means as may be provided under the Code) within three months of the financial year-end to which the reports and accounts relate (or such other period as may be permitted by the Authority). The semi-annual report and semi-annual accounts of the Fund will be sent or made available to the Holders (by post or by such electronic means as may be provided under the Code) within two months of the financial half-year end, i.e., 31 December (or such other period as may be permitted by the Authority).

If such accounts and reports are sent or made available to Holders by electronic means, the Trustee will also make available or cause to be made available hardcopies of the accounts and reports to any Holder who requests for them within two weeks of such request (or such other period as may be permitted by the Authority). Holders may also at any time choose to receive hardcopies of all future accounts and reports at no additional charge by notifying the relevant Distributing Agent in writing.

A copy of the annual report to Holders together with the financial statements of the Fund for the financial year ended 30 June 2016 is attached as Appendix B.

22. Distribution of income and capital

We have the absolute discretion to determine whether a distribution is to be made of all or part of the income of the Fund and (if we deem fit) all or part of the net capital gains realised on the sale of authorised investments of the Fund which are available for distribution. **Please note that distributions will be determined at our absolute discretion and will only be made to the extent that they are covered by the income of the Fund and by distributable net capital gains realised on the sale of Investments of the Fund. Please also note that any distribution will be automatically reinvested** in further Units of the Fund by a deemed automatic distribution reinvestment mandate unless such mandate is withdrawn by the Holder upon giving us written notice at least 30 days in advance.

Any distributions made will reduce the Value of the Fund.

23. Other Material Information

The following sections, extracted from the Deed, are set out for your information.

23.1 Information on investments

At the end of each quarter, Holders will receive a statement showing the value of their investment. However, if there is any transaction within a particular month, Holders will receive an additional statement at the end of that month.

23.2 Exemptions from liability

23.2.1 The Trustee and the Managers shall incur no liability in respect of any action taken or thing suffered by them in reliance upon any notice, resolution, direction, consent, certificate, affidavit, statement, certificate of stock, plan of reorganisation or other paper or document believed to be genuine and to have been passed, sealed or signed by the proper parties.

23.2.2 The Trustee and the Managers shall incur no liability to the Holders for doing or (as the case may be) failing to do any act or thing which by reason of any provision of any present or future law or regulation made pursuant thereto, or of any decree, order or judgment of any court, or by reason of any request, announcement or similar action (whether of binding legal effect or not) which may be taken or made by any person or body acting with or purporting to exercise the authority of any government (whether legally or otherwise) either they or any of them shall be directed or requested to do or perform or to forbear from doing or performing. If for any reason it becomes impossible or impracticable to carry out

any of the provisions of the Deed neither the Trustee nor the Managers shall be under any liability therefor or thereby.

- 23.2.3 Neither the Trustee nor the Managers shall be responsible for any authenticity of any signature or of any seal affixed to any endorsement on any transfer or form of application, endorsement or other document (whether sent by mail, facsimile, electronic means or otherwise) affecting the title to or transmission of Units or be in any way liable for any forged or unauthorised signature on or any seal affixed to such endorsement, transfer or other document or for acting upon or giving effect to any such forged or unauthorised signature or seal. The Trustee and the Managers respectively shall nevertheless be entitled but not bound to require that the signature of any person to any document required to be signed by him under or in connection with the Deed shall be verified to its or their reasonable satisfaction.
- 23.2.4 Any indemnity expressly given to the Trustee or the Managers in the Deed is in addition to and without prejudice to any indemnity allowed by law; Provided Nevertheless That any provision of the Deed shall be void insofar as it would have the effect of exempting the Trustee or the Managers from or indemnifying them against any liability for breach of trust or any liability which by virtue of any rule of law would otherwise attach to them in respect of any negligence, default, breach of duty or trust of which they may be guilty in relation to their duties where they fail to show the degrees of diligence and care required of them having regard to the provisions of the Deed.
- 23.2.5 Nothing herein contained shall be construed so as to prevent the Managers and the Trustee in conjunction or the Managers or the Trustee separately from acting as managers or trustees of trusts separate and distinct from the Fund and neither of them shall in any way be liable to account to the Fund or any other person for any profit or benefit made or derived hereby or in connection therewith.
- 23.2.6 Neither the Trustee nor the Managers shall be responsible for acting upon any resolution purported to have been passed at any meeting of the Holders in respect whereof minutes shall have been made and signed even though it may be subsequently found that there was some defect in the constitution of the meeting or the passing of the resolution or that for any reason the resolution was not binding upon all the Holders.
- 23.2.7 The Trustee and the Managers may accept as sufficient evidence of the Value of any Authorised Investment or the cost price or sale price thereof or of any market quotation a certificate by a Stockbroker or any other person, firm or association qualified in the opinion of the Managers to provide such a certificate.
- 23.2.8 At all times and for all purposes of the Deed the Trustee and the Managers may rely upon the established practice and rulings of the SGX-ST or any other Recognised Stock Exchange and any committees and officials thereof on which any dealing in any Authorised Investment or other property is from time to time effected in determining what shall constitute a good delivery and any similar

matters and such practice and rulings shall be conclusive and binding upon all persons under the Deed.

23.2.9 The Trustee and the Managers shall not be liable for the acts or omissions of each other.

23.2.10 Before making any payment to a Holder, any distribution or other payment in respect of any Unit or in respect of Management Fee or the remuneration of the Trustee, the Managers and/or the Trustee may make such deductions as by the law of Singapore or by any law, regulation or contractual obligation with any other country may require or allow in respect of any Income (as defined in the Deed) or other taxes, charges or assessments whatsoever (including any deduction for any tax liability imposed on the Fund that is attributable to such Holder) and the Managers and/or the Trustee may also deduct the amount of any stamp duties or other governmental taxes or charges payable by any of them or for which any of them might be made liable in respect of such payment or distribution or any documents signed by any of them in connection therewith. The Managers and the Trustee shall not be liable to account to any Holder or otherwise for any payment made or suffered by any of them in good faith to any duly empowered fiscal authority of Singapore or elsewhere for taxes or other charges in any way arising out of or relating to any transaction of whatsoever nature under the Deed notwithstanding that any such payments ought not to be or need not have been made or suffered.

23.3 Valuation

23.3.1 The Value, except where otherwise expressly stated and subject always to the requirements of the Code, with reference to any Authorised Investment which is:

- (a) a Quoted Investment, shall be calculated, as the case may be, by reference to the official closing price, the last known transacted price or the last transacted price on the SGX-ST or such Recognised Stock Exchange or OTC Market on which the Investment is traded before the Valuation Point in respect of the Dealing Day on which the Value is to be determined. Where such Quoted Investment is listed, dealt or traded in more than one Recognised Stock Exchange or OTC Market, the Managers (or such person as the Managers may appoint for the purpose) may in their absolute discretion select any one of such Recognised Stock Exchange or OTC Market for the foregoing purposes and, if there is no such official closing price, last known transacted or last transacted price, the value shall be calculated by reference to the last available price(s) quoted by responsible firms, corporations or associates on a Recognised Stock Exchange or an OTC market at the Valuation Point in respect of the Dealing Day on which the Value is to be determined;
- (b) an Unquoted Investment, shall be calculated by reference to, where applicable: (i) the initial value thereof being the amount expended in the acquisition thereof; (ii) the price of the relevant Investment as quoted by a

person, firm or institution making a market in that Investment, if any (and if there shall be more than one such market maker, then such market maker as the Managers may designate), as may be determined by the Managers to represent the fair value of such Investment; (iii) the sale prices of recent public or private transactions in the same or similar Investments, valuations of comparable companies or discounted cash flow analysis, as may be determined by the Managers to represent the fair value of such Investment. In the valuation of such Investment, the Managers may take into account relevant factors including, without limitation, significant recent events affecting the issuer such as pending mergers and acquisitions and restrictions as to saleability or transferability;

- (c) cash, deposits and similar assets shall be valued (by a person approved by the Trustee as qualified to value such cash, deposits and similar assets) at their face value (together with accrued interest) unless, in the opinion of the Managers, any adjustment should be made to reflect the value thereof;
- (d) a foreign exchange transaction, a forward rate transaction or a currency option, shall be valued in accordance with generally accepted methods or such other method as the Managers after consultation with the Trustee and the Auditors shall from time to time determine;
- (e) a unit or share in a unit trust scheme or mutual fund or collective investment scheme shall be valued at the latest published or available net asset value per unit or share, or if no net asset value per unit or share is published or available, then at their latest available realisation price; and
- (f) an Investment other than as described above, shall be valued (by a person approved by the Trustee as qualified to value such an Investment) in such manner and at such time as the Managers after consultation with the Trustee shall from time to time determine.

PROVIDED THAT, if the quotations referred to in (a), (b), (c), (d), (e) and (f) above are not available, or if the value of the Authorised Investment determined in the manner described in (a), (b), (c), (d), (e) or (f) above, in the opinion of the Managers, is not representative, then the value shall be such value as the Managers may with due care and in good faith consider in the circumstances to be fair value and is approved by the Trustee and the Managers shall notify the Holders of such change if required by the Trustee. For the purposes of this proviso, the "fair value" shall be determined by the Managers in consultation with a stockbroker or an approved valuer and with the approval of the Trustee in accordance with the Code. Where the fair value of a material portion of the Deposited Property cannot be determined, the Managers shall, subject to the provisions of the Code, suspend valuation and dealing in the Units of the Fund.

In exercising in good faith the discretion given by the proviso above, the Managers shall not, subject to the provisions of the Code, assume any liability towards the

Fund, and the Trustee shall not be under any liability in accepting the opinion of the Managers, notwithstanding that the facts may subsequently be shown to have been different from those assumed by the Managers.

The Managers may, to the extent permitted by the Authority, and subject to the prior approval of the Trustee, change the method of valuation as described above, and the Trustee shall determine if the Holders should be informed of such change.

23.3.2 In calculating the Value of the Deposited Property or any proportion thereof:

- (a) every Unit agreed to be issued by the Managers shall be deemed to be in issue and the Deposited Property shall be deemed to include not only cash or other assets in the hands of the Trustee but also the value of any accrued interest on bonds or other interest-bearing instruments or other assets to be received in respect of Units agreed to be issued after deducting therefrom or providing thereout the Preliminary Charge and (in the case of Units issued against the vesting of Authorised Investments) any moneys payable out of the Deposited Property pursuant to Clause 10 of the Deed;
- (b) where Authorised Investments have been agreed to be purchased or otherwise acquired or sold but such purchase, acquisition or sale has not been completed, such Authorised Investments shall be included or excluded and the gross purchase, acquisition or net sale consideration excluded or included as the case may require as if such purchase, acquisition or sale had been duly completed;
- (c) where in consequence of any notice or request in writing given pursuant to Clause 11 or 12 of the Deed a reduction of the Fund by the cancellation of Units is to be effected but such reduction has not been completed the Units in question shall not be deemed to be in issue and any amount payable in cash and the value of any Authorised Investments to be transferred out of the Deposited Property after deducting therefrom or providing thereout the Realisation Charge (if any) in pursuance of such reduction shall be deducted from the Value of the Deposited Property;
- (d) there shall be deducted any amounts not provided for above which are payable out of the Deposited Property including:
 - (i) any amount of Management Fee, the remuneration of the Trustee and any other expenses accrued but remaining unpaid;
 - (ii) the amount of tax, if any, on capital gains (including any provision made for unrealised capital gains) accrued up to the end of the last accounting period and remaining unpaid;

- (iii) the amount in respect of tax, if any, on net capital gains realised during a current accounting period prior to the valuation being made as in the estimate of the Managers will become payable;
 - (iv) the aggregate amount for the time being outstanding of any borrowings effected under Clause 16(C) of the Deed together with the amount of any interest and expenses thereon accrued pursuant to paragraph (v) of the said Clause 16(C) of the Deed and remaining unpaid; and
 - (v) all such costs, charges, fees and expenses as the Managers may have determined pursuant to the provisions of the Deed;
- (e) there shall be taken into account such sum as in the estimate of the Managers will fall to be paid or reclaimed in respect of taxation related to Income up to the time of calculation of the Value of the Deposited Property;
 - (f) there shall be added the amount of any tax, if any, on capital gains estimated to be recoverable and not received;
 - (g) any Value (whether of an Authorised Investment, cash or a liability) otherwise than in Singapore Dollars and any non-Singapore Dollar borrowing shall be converted into Singapore Dollars at the rate (whether official or otherwise) which the Managers shall after consulting with or in accordance with a method approved by the Trustee deem appropriate to the circumstances having regard inter alia to any premium or discount which may be relevant and to the costs of exchange; and
 - (h) where the current price of an Authorised Investment is quoted "ex" dividend, interest or other payment but such dividend, interest or other payment has not been received the amount of such dividend, interest or other payment shall be taken into account.

The Managers may, subject to the prior approval of the Trustee and to the extent permitted by the Authority, change the method of valuation as described above, and the Trustee shall determine if the Holders should be informed of such change.

23.4 Appointment, Removal or Retirement of Trustee

23.4.1 Retirement of Trustee

The Trustee shall not be entitled to retire voluntarily except upon the appointment of a new trustee. In the event of the Trustee desiring to retire, it shall give notice in writing to that effect to the Managers and the Managers shall use their best endeavours to appoint another person (duly approved as may be required by the law for the time being applicable to the Deed) as the new trustee of the Fund.

If no new trustee is appointed by the Managers as aforesaid within a period of three months after the date of receipt by the Managers of the Trustee's notice of retirement, the Trustee shall be entitled to appoint such person selected by it (duly approved as aforesaid) as a new trustee of the Fund.

23.4.2 Removal of Trustee

The Trustee may be removed by notice in writing given by the Managers in any of the following events:

- (a) if the Trustee goes into liquidation (except a voluntary liquidation for the purpose of reconstruction or amalgamation) or if a receiver is appointed over any of its assets or if a judicial manager is appointed in respect of the Trustee;
- (b) if the Trustee fails or neglects after reasonable notice from the Managers to carry out or satisfy any duty imposed on the Trustee by the Deed;
- (c) if the Holders by extraordinary resolution duly passed at a meeting of Holders held in accordance with the provisions contained in the Schedule to the Deed and of which not less than 21 days' notice has been given to the Trustee and the Managers shall so decide; and
- (d) if the Authority directs that the Trustee be removed.

In any of such events the Managers shall appoint another person (duly approved as may be required by the law for the time being applicable to the Deed) as the new trustee of the Fund.

23.5 Removal or Retirement of Managers

23.5.1 Retirement of Managers

The Managers shall have power to retire in favour of a corporation approved by the Trustee upon and subject to such corporation entering into such deed or deeds supplemental to the Deed to replace the Managers.

The retiring Managers shall be absolved and released from all further obligations under the Deed after a deed has been entered into to secure the due performance by the new managers of their obligations under the Deed, and after the retiring Managers have paid all amounts payable to the Trustee. However, this will not prejudice the rights of the Trustee or of any Holder, former Holder or other person in respect of any act or omission of the Managers prior to their retirement.

23.5.2 Removal of Managers

Subject to Section 295 of the SFA, the Managers shall be subject to removal by notice in writing given by the Trustee in any of the following events:

- (a) if the Managers go into liquidation (except a voluntary liquidation for the purpose of reconstruction or amalgamation upon terms previously approved in writing by the Trustee) or if a receiver is appointed over any of its assets or a judicial manager is appointed in respect of the Managers;
- (b) if the Managers cease to carry on business;
- (c) if the Managers fail or neglect after reasonable notice from the Trustee to carry out or satisfy any obligations imposed on the Managers by the Deed;
- (d) if for good and sufficient reason the Trustee is of the opinion, and so states in writing, that a change of Managers is desirable in the interests of the Holders. If the Managers within one month states in writing that it is dissatisfied with the Trustee's opinion, the matter shall be referred to arbitration in accordance with the provisions of the Arbitration Act, Chapter 10, of Singapore;
- (e) if the Holders by extraordinary resolution passed at a meeting of Holders duly convened and held in accordance with the provisions of the Schedule to the Deed decide to remove the Managers; and
- (f) if the Authority directs the Trustee to remove the Managers.

In any of such events the Trustee shall appoint another corporation as the new managers of the Fund.

23.6 Termination of the Fund

The Deed provides that the Fund may be terminated in the following circumstances:

- 23.6.1 Either the Trustee or the Managers may in their absolute discretion terminate the Fund at any time after three years from the date of commencement of the initial launch period of the Fund by giving to the other not less than six months' written notice given so as to expire at the end of the accounting period current at the end of the third year after the date of the Deed or any year thereafter. Either the Trustee or the Managers shall be entitled by notice in writing as aforesaid to make the continuation of the Fund beyond any such date conditional on the revision to its or their satisfaction at least three months before the relevant date of its or their remuneration under the provisions of the Deed. In the event that the Fund shall fall to be terminated or discontinued the Managers shall give notice thereof to all Holders not less than three months in advance. Subject as aforesaid the Fund shall continue until terminated in the manner set out in this paragraph 23.6.

23.6.2 Subject to Section 295 of the SFA, the Fund may be terminated by the Trustee by notice in writing in any of the following events:

- (a) if the Managers shall go into liquidation (except a voluntary liquidation for the purpose of reconstruction or amalgamation upon terms previously approved in writing by the Trustee) or if a receiver is appointed over any of their assets or if a judicial manager is appointed in respect of the Managers or if any encumbrancer shall take possession of any of their assets or if they shall cease business;
- (b) if any law shall be passed, any authorisation withdrawn or revoked or the Authority issues any direction which renders it illegal or in the Trustee's opinion, impracticable or inadvisable to continue the Fund; and
- (c) if within the period of three months from the date of the Trustee expressing in writing to the Managers that it wishes to retire the Managers shall have failed to appoint a new trustee within the terms of the Deed.

23.6.3 By the Managers in their absolute discretion by notice in writing in any of the following events:

- (a) if the aggregate Value (as defined in paragraph 23.3) of the Deposited Property (defined in the Deed to mean all the assets, including cash, for the time being held or deemed to be held upon the trusts of the Deed excluding any amount for the time being standing to the credit of the Distribution Account) shall be less than S\$5,000,000 at any time on or after five years from the date of the Deed; or
- (b) if any law shall be passed, any authorisation withdrawn or revoked or the Authority issues any direction which renders it illegal or, in the Managers' opinion, impracticable or inadvisable to continue the Fund.
- (c) By extraordinary resolution of a meeting of the Holders duly convened and held in accordance with the provisions of the Schedule to the Deed at any time after five years from the date of the Deed.

23.7 Holders' right to vote

A meeting of Holders duly convened and held in accordance with the provisions of the Schedule of the Deed shall be competent by Extraordinary Resolution:

23.7.1 to sanction any modification, alteration or addition to the provisions of the Deed which shall be agreed by the Trustee and the Managers as provided in Clause 37 of the Deed;

23.7.2 to sanction a supplemental deed increasing the maximum permitted percentage of the management fee and/or the trustee fee;

- 23.7.3 to terminate the Fund as provided in Clause 34(F) of the Deed;
- 23.7.4 to remove the Auditors as provided in Clause 30(D) of the Deed;
- 23.7.5 to remove the Trustee as provided in Clause 31(C)(iii) of the Deed;
- 23.7.6 to remove the Managers as provided in Clause 32(A)(v) of the Deed;
- 23.7.7 to sanction any change in the investment policy based on the Authorised Investments within the period of 3 years from the date of commencement of the initial launch period of the Fund as provided in Clause 15(A) of the Deed;
- 23.7.8 to direct the Trustee to take any action (including the termination of the Fund) pursuant to Section 295 of the SFA; and
- 23.7.9 to sanction such other matters as may be proposed by the Managers or the Trustee,
- but shall not have any further or other powers.

"**Extraordinary Resolution**" is defined in the Deed to mean a resolution proposed and passed as such by a majority consisting of 75% or more of the total number of votes cast for and against such resolution.

24. Investment Restrictions

The Fund is subject to the investment and borrowing guidelines under Appendices 1 and 5 of the Code (the "**Investment and Borrowing Guidelines**"). The latest version of the Code may be found at the Authority's website: www.mas.gov.sg. Please note that the Authority may, from time to time, update or amend the Code.

Please refer to the Appendix A for a summary of the Investment and Borrowing Guidelines which apply to the Fund.

In addition, please note that the Units are Excluded Investment Products (as defined in the Notice on the Sale of Investment Products issued by the Authority, as the same may be modified, amended or revised from time to time) ("**EIPs**") and that the Fund does not invest and will not invest in any product and does not engage and will not engage in any transaction which may cause the Units not to be regarded as EIPs.

25. Taxation

As a designated unit trust ("**DUT**") within the meaning of Section 35(12) of the Income Tax Act, Chapter 134, of Singapore (the "**Income Tax Act**"), the following treatment will apply in relation to Singapore income tax:

The following amounts earned by the Fund ("**Designated Income**") are exempt from income tax in the hands of the trustees:

- Interest (other than interest from which Singapore income tax has been withheld under Section 45 of the Income Tax Act), including interest from qualifying debt securities;
- Dividends derived from outside Singapore and received in Singapore;
- Gains or profits derived from Singapore or elsewhere from the disposal of securities;
- Rental and any other income derived from any immovable properties situated outside Singapore and received in Singapore;
- Discount income derived from outside Singapore and received in Singapore;
- Discount income from qualifying debt securities issued during the period from 17 February 2006 to 31 December 2018;
- Distributions from foreign unit trusts derived from outside Singapore and received in Singapore;
- Fees and compensatory payments derived (other than fees and compensatory payments for which tax has been deducted under Section 45A) from securities lending or repurchase arrangements with certain specified persons;
- Gains derived from disposal of debentures, stocks, shares, bonds or notes issued by supranational bodies;
- Gains or profits derived from:
 - (i) foreign exchange transactions;
 - (ii) transactions in future contracts;
 - (iii) transactions in interest rate or currency forwards, swaps or option contracts; and
 - (iv) transactions in forwards, swaps or option contracts relating to any securities or financial index;
- Prepayment fee, redemption premium and break cost from qualifying debt securities issued during the period from 15 February 2007 to 31 December 2018; and
- Such other income directly attributable to qualifying debt securities issued on or after a prescribed date, as may be prescribed by regulations.

Unless otherwise exempt from tax, any income that is not within the prescribed list of Designated Income ("**non-Designated Income**") will generally be subject to tax at the prevailing corporate income tax rate, currently at 17%. Such income will be taxed at the Fund level.

The Fund would not be taxable in respect of dividends paid by Singapore tax resident companies and tax exempt distributions from real estate investment trusts listed on the Singapore Exchange and registered business trusts.

No tax is withheld from distributions made by a DUT.

Dividends, interest income, gains from the disposal of investments and other income received by the Fund on its investments in some foreign countries may be liable to the imposition of withholding tax or other tax in the foreign country.

Holders level – Distributions

Individuals

Any distribution made by a DUT and received by an individual (whether resident or not) is exempt from Singapore income tax, except where such income is derived through a partnership in Singapore or is derived from the carrying on of a trade, business or profession.

Non-individuals

Any distribution made by a DUT and received by a foreign investor (other than an individual) is exempt from Singapore income tax provided that the distribution is not connected with a permanent establishment that the foreign investor may have in Singapore.

Foreign investor:

- (a) in relation to an individual, means an individual who is not resident in Singapore;
- (b) in relation to a company, means a company which is neither resident in Singapore nor carrying on business through a permanent establishment in Singapore, and not less than 80% of the total number of the issued shares of which are beneficially owned, directly or indirectly, by persons who are not citizens of Singapore and not resident in Singapore; and
- (c) in relation to a trust fund, means a trust fund where at least 80% of the value of the fund is beneficially held, directly or indirectly, by foreign investors referred to above and, unless waived by the Singapore Minister for Finance or such person as he may appoint, where:
 - (i) the trust fund is created outside Singapore; and
 - (ii) the trustees of the trust fund are neither citizens of Singapore nor resident in Singapore, nor do they carry out duties as such trustees through a permanent establishment in Singapore.

Other Holders

Other Holders (i.e. those who are neither individuals nor foreign investors) are generally subject to Singapore income tax on the gross amount of the distributions paid out of Designated Income by the Fund. Such distributions are deemed to be income of, and will be taxed in the hands of such Holders at their applicable tax rates. In the case of a corporate Holder, the current income tax rate is 17%. Where the Designated Income is specified income from qualifying debt securities (as defined in the Income Tax Act), any distribution made out of such income will, based on the current practice of the Inland Revenue Authority of Singapore ("**IRAS**"), be taxed at the concessionary rate of 10%.

In general, any non-Designated Income is subject to final tax at the Fund's level. Any distributions made out of non-Designated Income will not be subject to further Singapore income tax in the hands of such Holders.

Distributions made by the Fund out of any tax-exempt income, such as dividends paid by a Singapore tax resident company, are also exempt from Singapore income tax in the hands of such Holders.

Holders level – Disposal or redemption of Units

Singapore currently does not impose tax on capital gains. However, there are no specific laws or regulations which deal with the characterization of gains. In general, gains from the disposal or redemption of the Units may be construed to be of an income nature and subject to Singapore income tax if they arise from activities which the IRAS regards as the carrying on of a trade or business in Singapore.

In addition, Holders of Units who apply, or who are required to apply, the Singapore Financial Reporting Standard 39 Financial Instruments - Recognition and Measurement ("**FRS 39**") for the purposes of Singapore income tax may be required to recognize gains or losses (not being gains or losses in the nature of capital) in accordance with the provisions of FRS 39 (as modified by the applicable provisions of Singapore income tax law) even though no sale or disposal of Units is made.

26. Queries and Complaints

All enquiries and complaints about the Fund should be directed to us at:

Hotline No	:	6908 4477
Operating hours	:	9.30 a.m. to 5.30 p.m. daily (Singapore time)
Fax No	:	6908 4478
Email	:	contact@sicim.com.sg

Appendix A – Investment and Borrowing Guidelines

1 Permissible Investments

1.1 The scheme's underlying investments may only consist of the following permissible investments:

- a) transferable securities;
- b) money market instruments;
- c) eligible deposits;
- d) units in other schemes;
- e) financial derivatives; and
- f) shares or securities equivalent to shares that are not listed for quotation or quoted and have not been approved for listing for quotation or quotation on an organised exchange.

1.2 For the purpose of paragraph 1.1,

- a) "transferable securities" refer to:
 - i) shares or securities equivalent to shares; and
 - ii) bonds or other securitised debt instruments, that meet the requirements of paragraph 1.3 but do not include:
 - A) money market instruments; or
 - B) any security the title to which cannot be transferred or can be transferred only with the consent of a third party.
- b) "eligible deposits" refer to deposits with banks licensed under the Banking Act (Cap. 19), finance companies licensed under the Finance Companies Act (Cap. 108), merchant banks approved as financial institutions under section 28 of the Monetary Authority of Singapore Act (Cap. 186) or any other deposit-taking institution licensed under an equivalent law in a foreign jurisdiction.

Requirements of transferable securities

1.3 Transferable securities should meet the following requirements:

- a) the maximum potential loss which may be incurred as a result of the investment is limited to the amount paid for it;
- b) the investment is liquid;
- c) the investment is subject to reliable and verifiable valuation on a daily basis; and
- d) there is appropriate information available to the market on the investment or, where relevant, on the portfolio.

Requirements on investments in other schemes

1.4 A scheme may invest in other schemes only if the underlying scheme is:

- a) an authorised or recognised scheme;
- b) a scheme which:
 - i) is constituted and regulated in a jurisdiction where the laws and practices afford to participants in Singapore protection at least equivalent to that afforded to participants of schemes which are wholly managed in Singapore;

- ii) adheres to investment and borrowing guidelines which are substantially similar to those set out in the relevant Appendices of the Code; and
 - iii) has a manager that is reputable and supervised by an acceptable financial supervisory authority; or
- c) a scheme which is invested in permissible investments, commodities or real estate, meets the requirements set out in paragraph 1.3(a) to (d) and, for the purposes of this paragraph, the units in the scheme are listed for quotation and traded on an organised exchange.

1.5 A scheme may feed substantially into an underlying fund-of-funds but the underlying fund-of-funds should invest in other schemes directly and not through another fund-of-funds.

Requirements of financial derivatives

1.6 Financial derivatives should meet the following requirements:

- a) the underlying consists of instruments referred to in paragraph 1.1, commodities, indices which meets the requirements in paragraphs 4 and 5 of Appendix 5 of the Code on Collective Investment Schemes (which are respectively stated in paragraphs 8 and 9 of this Appendix A), interest rates, foreign exchange rates or currencies. In the case of financial derivatives on commodities, such transactions should be settled in cash at all times;
- b) the financial derivatives are liquid;
- c) the financial derivatives are subject to reliable and verifiable valuation on a daily basis and can be sold, liquidated or closed by an offsetting transaction at any time at their fair value; and
- d) the financial derivatives should not result in the delivery of investments other than those described in paragraph 1.1(a) to (f).

OTC financial derivatives

1.7 In the case of OTC financial derivatives, reliable and verifiable valuation stated in paragraph 1.6(c) refers to:

- a) a valuation made by the manager based on a current market value; or
- b) where such value is not available, a fair value based on an appropriate valuation model which is checked at an appropriate frequency by an independent party.

The valuation by the manager should not be based solely on a valuation provided by the counterparty to the transaction.

2 Spread of Investments

Single entity limit and group limit

2.1 A scheme should comply with the following limits:

- a) Investments in:
 - i) transferable securities; or
 - ii) money market instruments
 issued by a single entity should not exceed 10% of the scheme's net asset value ("**single entity limit**").

- b) Aggregate investments in, or exposures to, a group of entities through:
 - i) transferable securities;
 - ii) money market instruments;
 - iii) eligible deposits; and
 - iv) counterparty risk exposures arising from the use of OTC financial derivativesshould not exceed 20% of the scheme's net asset value ("**group limit**"). For the purposes of this paragraph, a group of entities refers to an entity, its subsidiaries, fellow subsidiaries and its holding company.

Short-term deposits

- 2.2 The group limit does not apply to placements of eligible deposits arising from:
 - a) subscription monies received at any point in time pending the commencement of investment by the scheme; or
 - b) liquidation of investments prior to the termination or maturity of a scheme, where the placing of these monies with various institutions would not be in the interests of participants.

Benchmark limit

- 2.3 Where the scheme and its reference benchmark comply with paragraphs 4 and 5 of Appendix 5 of the Code on Collective Investment Schemes (which are respectively stated in paragraphs 8 and 9 of this Appendix A), the scheme may invest in a transferable security that is a constituent of the reference benchmark, up to a single entity limit as specified in paragraph 2.1(a) of this Appendix A or two percentage points above the benchmark weight, whichever is higher. Where the foregoing single entity limit is in excess of the limit in paragraph 2.1(a) of this Appendix A, the group limit of 20% may be raised to 25% of the scheme's net asset value.

Government and other public debt securities / money market instruments

- 2.4 The single entity limit of 10% may be raised to 35% of the scheme's net asset value where:
 - a) the issuing entity or trust is, or the issue is guaranteed by, either a government, government agency or supranational, that has a minimum long-term rating of BBB by Fitch, Baa by Moody's or BBB by Standard and Poor's (including such sub-categories or gradations therein); and
 - b) except for schemes with a fixed maturity, not more than 20% of the scheme's net asset value may be invested in any single issue of transferable securities or money market instruments by the same entity or trust.
- 2.5 If there is a downgrade in rating to that below the minimum rating as stated in paragraph 2.4(a), or if the rating agencies no longer rate the entity or the guarantor, the single entity limit should revert to 10%.
- 2.6 The single entity limit of 10% does not apply where:
 - a) the issuing entity or trust is, or the issue is guaranteed by, either a government, government agency or supranational, that has a minimum long-term rating of AA by Fitch, Aa by Moody's or AA by Standard and Poor's (including such sub-categories or gradations therein); and

- b) except for schemes with a fixed maturity, not more than 20% of the scheme's net asset value may be invested in any single issue of transferable securities or money market instruments by the same entity or trust.

2.7 If there is a downgrade in rating to that below the minimum rating as stated in paragraph 2.6(a), or if the rating agencies no longer rate the entity or the guarantor, the single entity limit as specified in paragraph 2.1(a) or 2.4, as the case may be, should apply accordingly.

Unrated and non-investment grade corporate debt securities

2.8 The single entity limit of 10% in paragraph 2.1(a) for bonds and other securitised debt instruments is lowered to 5% of the scheme's net asset value if the issuing entity or trust:

- a) is not rated; or
- b) has a long-term rating below that of BBB by Fitch, Baa by Moody's or BBB by Standard and Poor's (including such sub-categories or gradations therein).

2.9 Notwithstanding paragraph 2.8(a), the manager may rely on:

- a) the rating of an unrated issuer's parent company provided that an explicit guarantee by the parent company for the issuer is in place; or
- b) its internal rating of an unrated issuer if the manager has satisfied the trustee that its internal rating is comparable to a rating issued by Fitch, Moody's or Standard & Poor's.

Commodity-backed debt securities

2.10 A scheme may invest in debt securities that are undated, secured by physical commodities, listed for quotation and traded on an organised exchange, subject to the limit in paragraph 2.13.

Investment in other schemes

2.11 A scheme may invest up to 100% of its net asset value in another scheme only if the underlying scheme satisfies paragraph 1.4(a) or (b).

2.12 Investments in an underlying scheme which does not satisfy paragraph 1.4(a) or (b) but satisfies:

- a) paragraph 1.4(c) and is invested in permissible investments or real estate should not exceed 10% of the scheme's net asset value; or
- b) paragraph 1.4(c) and is invested directly in commodities is subject to the limit in paragraph 2.13.

Alternative exposure limit

2.13 Investments in:

- a) shares or securities equivalent to shares that are not listed for quotation or quoted, and have not been approved for listing for quotation or quotation, on an organised exchange;
- b) debt securities which are undated, secured by physical commodities, listed for quotation and traded on an organised exchange; and
- c) underlying schemes which do not satisfy paragraph 1.4(a) or (b) but satisfy paragraph 1.4(c) and are invested directly in commodities, are subject to an aggregate limit of 10% of a scheme's net asset value.

Concentration limit

- 2.14 A scheme should not invest in more than:
- a) 10% of the total outstanding shares, or securities equivalent to shares, of any single entity or trust;
 - b) 10% of each individual issuance of debt securities of any single issuing entity or trust, where such issuance is not part of a debt issuance programme; or where debt securities are issued under a debt issuance programme, 20% of each tranche, subject to a limit of 10% of the overall programme size; and
 - c) 10% of the money market instruments of a single issuing entity or trust.

3 Global Exposure

- 3.1 The global exposure of a scheme to financial derivatives or embedded financial derivatives should not exceed 100% of the scheme's net asset value at all times.
- 3.2 The manager should calculate the global exposure of a scheme based on the:
- a) Commitment Approach; or
 - b) Value at Risk (VaR) Approach (including any other variants of the VaR Approach), subject to prior consultation with the Authority.

Commitment Approach

- 3.3 The global exposure of a scheme is calculated as the sum of:
- a) the absolute value of the exposure of each individual financial derivative not involved in netting or hedging arrangements;
 - b) the absolute value of the net exposure of each individual financial derivative after netting or hedging arrangements; and
 - c) the sum of the values of cash collateral received pursuant to:
 - i) the reduction of exposure to counterparties of OTC financial derivatives; and
 - ii) EPM techniques relating to securities lending and repurchase transactions, and that are reinvested.

Netting arrangements

- 3.4 Netting arrangements may be taken into account to reduce a scheme's exposure to financial derivatives.
- 3.5 A scheme may net positions between:
- a) financial derivatives on the same underlying assets, even if the maturity dates are different; or
 - b) financial derivatives and the same corresponding underlying asset, if those underlying assets are transferable securities, money market instruments or units in other schemes.

Hedging arrangements

- 3.6 Hedging arrangements may be taken into account to reduce a scheme's exposure to financial derivatives.

- 3.7 The marked-to-market value of transferable securities, money market instruments or units in schemes involved in hedging arrangements may be taken into account to reduce a scheme's exposure to financial derivatives.
- 3.8 For the purposes of paragraphs 3.6 and 3.7, the hedging arrangement should:
- a) not be aimed at generating a return;
 - b) result in an overall verifiable reduction of the risk of the scheme;
 - c) offset the general and specific risks linked to the underlying being hedged;
 - d) relate to the same asset class being hedged; and
 - e) be able to meet its hedging objective in all market conditions.
- 3.9 Notwithstanding paragraph 3.8, financial derivatives used for the purposes of hedging currency exposure may be netted when calculating the global exposure.

Exposure arising from reinvestment of cash collateral

- 3.10 A scheme which reinvests cash collateral received from counterparties of OTC financial derivatives, securities lending or repurchase transactions to generate a return in excess of high quality 3-month government bonds should include in its global exposure calculations the cash amount reinvested.

VaR Approach or its variants

- 3.11 The manager may apply to the Authority to use the VaR Approach or its variants to calculate the global exposure of a scheme instead of the Commitment Approach.
- 3.12 The global exposure of the scheme should also take into account exposures arising from the reinvestment of cash collateral.
- 3.13 The manager should comply with guidelines in Annex 1B to Appendix 1 of the Code on Collective Investment Schemes in lieu of paragraphs 4.9 to 4.14 of this Appendix A.

4 Use of Financial Derivatives

Spread of underlying assets

- 4.1 The exposure of a scheme to the underlying assets of financial derivatives should be sufficiently diversified on a portfolio basis.
- 4.2 In the case where the underlying assets are:
- a) transferable securities, money market instruments, eligible deposits or units in other schemes, the limits in section 2 of this Appendix A, except for the concentration limits, apply;
 - b) commodities, the limits in paragraph 4 of Appendix 5 of the Code on Collective Investment Schemes (which is stated in paragraph 8 of this Appendix A) apply; and
 - c) indices, paragraphs 4.2(a) and (b) of this Appendix A apply to each constituent of the index, where applicable, on a portfolio basis.

Embedded financial derivatives

- 4.3 Where a transferable security or money market instrument embeds a financial derivative, the requirements in sections 3 and 4 apply to the embedded financial derivative.
- 4.4 Where the counterparty risk of the embedded derivative is or may be transferred to the scheme, the requirements in section 5 also apply to the embedded financial derivative.
- 4.5 A transferable security or money market instrument is considered to be embedding a financial derivative if it contains a component which fulfils the following criteria:
- a) the component results in some or all of the cash flows that otherwise would be required by the transferable security or money market instrument which functions as host contract to be modified according to a variable including but not limited to a specified interest rate, price of a financial instrument, foreign exchange rate, index of prices or rates, credit rating or credit index, and therefore vary in a way similar to a stand-alone financial derivative;
 - b) the component's economic characteristics and risks are not closely related to the economic characteristics and risks of the host contract; and
 - c) the component has a significant impact on the risk profile and pricing of the transferable security or money market instrument.
- 4.6 A transferable security or a money market instrument should not be regarded as embedding a financial derivative where it contains a component which is contractually transferable independently of the transferable security or the money market instrument. Such a component should be deemed to be a separate financial instrument.
- 4.7 Where an instrument is structured as an alternative to an OTC financial derivative or tailor-made to meet the specific needs of a scheme, the instrument should be deemed as embedding a financial derivative.

Cover

- 4.8 A transaction in financial derivatives which gives rise, or may give rise, to a future commitment on behalf of a scheme should be covered as follows:
- a) in the case of financial derivatives which will, or may at the option of the scheme, be cash settled, the scheme should hold, at all times, liquid assets sufficient to cover the exposure;
 - b) in the case of financial derivatives which will, or may at the option of the counterparty, require physical delivery of the underlying assets, the scheme should hold the underlying assets in sufficient quantities to meet the delivery obligation at all times. If the manager deems the underlying assets to be sufficiently liquid, the scheme may hold as coverage other liquid assets in sufficient quantities, provided that such alternative assets may be readily converted into the underlying asset at any time to meet the delivery obligation.

Exposure to financial derivatives - Commitment Approach

- 4.9 The exposure of the scheme to financial derivatives under the Commitment Approach in paragraph 3.3 of this Appendix A is described below. Exposure is determined by converting the positions in financial derivatives into equivalent positions in the underlying assets.

Calculation methods

- 4.10 Table 1 below sets out the methods for calculating the exposure of various financial derivatives under the Commitment Approach.
- 4.11 The exposure to financial derivatives under the Commitment Approach should be converted into the base currency of the scheme by using the spot rate.
- 4.12 Where a currency financial derivative has two legs that are not in the base currency of the scheme, the exposure to both legs should be accounted for under the Commitment Approach.
- 4.13 For financial derivatives not covered in Table 1 below or where the methods do not provide an adequate and accurate assessment of the risks relating to the financial derivatives, the manager should inform and justify to the Authority of the alternative method applied.
- 4.14 The calculation methodology of the alternative method referred to in paragraph 4.13 should be based on the market value of the equivalent position in the underlying asset, although the notional value or price of the financial derivative may be used if it is more conservative. Where a more conservative calculation is used, hedging and netting arrangements, as set out in paragraphs 3.4 to 3.9, should not be taken into account to reduce the exposure to the financial derivative involved if it results in an underestimation of the global exposure.

Types of financial derivatives	Method for calculating exposure
Plain Vanilla Options (Include bought/sold puts and calls)	
Bond option	No. of contracts x face value x underlying price x delta
Currency option	Contract's notional value (of currency leg) x delta
Equity option	No. of contracts x no. of equity shares x underlying price x delta
Index option	No. of contracts x contract's notional value x index level x delta
Interest rate option	Contract's notional value x delta
Warrant and Rights	No. of shares/bonds x market value of underlying referenced asset x delta
Futures	
Bond future	No. of contracts x contract's notional value x market value of the future; or No. of contracts x contract's notional value x market price of the cheapest bond to deliver, adjusted by the conversion factor
Currency future	No. of contracts x contract's notional value
Equity future	No. of contracts x contract's notional value x market price of underlying equity share
Index future	No. of contracts x value of 1 point x index level
Interest rate future	No. of contracts x contract's notional value

Commodity future	No. of contracts x contract's notional value
Swaps	
Contract for differences	No. of shares/bonds x market value of underlying referenced instrument
Credit default swap	Protection buyer: market value of the underlying reference asset Protection seller: the higher of the market value of the underlying reference asset or the notional value of the credit default swap
Currency swap	Notional value of currency leg(s)
Interest rate swap	Market value of underlying; or Notional value of the fixed leg
Total return swap	Underlying market value of reference asset(s)
Forwards	
Forward rate agreement	Notional value
FX forward	Notional value of currency leg(s)

5 Counterparty of Financial Derivatives

OTC financial derivatives

- 5.1 The counterparty of an OTC financial derivative should be subject to prudential supervision by a financial supervisory authority in its home jurisdiction.
- 5.2 Subject to the group limit in paragraph 2.1, the maximum exposure of a scheme to the counterparty of an OTC financial derivative may not exceed:
- in the case of an eligible financial institution described in paragraph 5.3, 10% of the scheme's net asset value; or
 - in any other case, 5% of the scheme's net asset value ("**counterparty limits**").
- 5.3 For purpose of paragraph 5.2, an eligible financial institution should have a minimum long-term rating of A by Fitch, A by Moody's or A by Standard and Poor's (including sub-categories or gradations therein). Alternatively, where the financial institution is not rated, the scheme should have the benefit of a guarantee by an entity which has a long-term rating of A (including sub-categories or gradations therein).
- 5.4 The exposure to a counterparty of an OTC financial derivative should be measured based on the maximum potential loss that may be incurred by the scheme if the counterparty defaults and not on the basis of the notional value of the OTC financial derivative.

Calculation method

- 5.5 The exposure to a counterparty of an OTC financial derivative should be calculated as follows:
- Stage 1: Determine the current replacement cost of each OTC financial derivative by carrying out a valuation at market price.
- Stage 2: Derive the "add-on factor" by multiplying the notional principal amount or the market value of the underlying asset of the OTC financial derivative, whichever

is more conservative, by the percentages in the table below to reflect the potential credit risk:

Residual Term	Interest rate contracts	Exchange rate contracts	Equity derivative contracts	Other contracts
1 year or less	0%	1%	6%	10%
> 1 year and < 5 years	0.5%	5%	8%	12%
> 5 years	1.5%	7.5%	10%	15%

- i) For total return swaps and credit default swaps, the relevant percentage is 10% regardless of the residual term.
- ii) In the case of credit default swaps where the scheme acts as protection seller, the relevant percentage may be set at 0% unless the credit default swap contract incorporates a provision on closeout upon insolvency. In the latter case, the amount to be taken into account for the add-on factor will be limited to the premium or interest to be received (i.e. unpaid premium at the time of the calculation).
- b) The counterparty exposure arising from an OTC financial derivative contract is the sum of the positive replacement cost computed in Stage 1 and the add-on factor computed in Stage 2.
- c) The total exposure to a single counterparty, or group of counterparties, is calculated by summing the exposures arising from all OTC financial derivative transactions entered into with the same counterparty or group.

Recognition of collateral

5.6 The exposure to a counterparty may be construed as being lower if collateral is tendered to the scheme. The collateral should meet the following requirements:

- a) it is marked-to-market daily;
- b) it is liquid;
- c) it is taken into account, on a portfolio basis, for the purposes of the requirements on spread of investments in section 2 of this Appendix A;
- d) it is not issued by the counterparty or its related corporations;
- e) it is held by a custodian which is:
 - i) a financial institution subject to prudential supervision by a financial supervisory authority in its home jurisdiction; and
 - ii) independent of the counterparty;
- f) it is legally secured from the consequences of the failure of the custodian, counterparty and their related corporations;
- g) it can be fully enforced by the trustee at any time;
- h) it is free from all prior encumbrances; and
- i) it cannot be sold or given as security interests.

5.7 Collateral may only consist of:

- a) cash;
- b) money market instruments; or
- c) bonds.

- 5.8 For the purpose of paragraph 5.7, money market instruments and bonds should be issued by, or have the benefit of a guarantee from, a government, government agency or supranational, that has a long-term rating of AAA by Fitch, Aaa by Moody's or AAA by Standard and Poor's (including sub-categories or gradations therein).
- 5.9 Notwithstanding paragraph 5.7, securitised debt instruments as well as money market instruments or bonds with embedded financial derivatives are not eligible as collateral.
- 5.10 The manager should ensure that it has the appropriate legal expertise to put in place proper collateral arrangements, as well as appropriate systems and operational capabilities for proper collateral management.
- 5.11 Additional collateral should be provided to the scheme no later than the close of the next business day if the current value of the collateral tendered is insufficient to satisfy the counterparty limits in paragraph 5.2.

Reinvestment of collateral

- 5.12 Collateral obtained in the form of cash by the scheme may be reinvested subject to the following requirements:
- a) it is invested in financial instruments consistent with paragraphs 5.7 and 5.8;
 - b) the investments are taken into account, on a portfolio basis, for the purposes of the requirements on spread of investments in section 2 of this Appendix A;
 - c) the investments are held by a custodian which is:
 - i) a financial institution subject to prudential supervision by a financial supervisory authority in its home jurisdiction; and
 - ii) independent of the counterparty;
 - d) the investments are legally secured from the consequences of the failure of the custodian, counterparty and their related corporations;
 - e) the investments cannot be sold or given as security interests; and
 - f) the manager is reasonably satisfied that any investment of cash collateral by the scheme will enable the scheme to meet its redemption obligations and other payment commitments.
- 5.13 Notwithstanding paragraph 5.12, the cash collateral obtained should not be invested in transferable securities issued by, or placed on deposit with, the counterparty or its related corporations.
- 5.14 Non-cash collateral obtained by the scheme may not be reinvested.

Recognition of netting

- 5.15 For the purpose of paragraph 5.2 of this Appendix A, a scheme may net its OTC financial derivative positions with the same counterparty through bilateral contracts for novation or other bilateral agreements between the scheme and its counterparty provided that such netting arrangements satisfy the following conditions:
- a) in the case of a bilateral contract for novation, mutual claims and obligations are automatically amalgamated in such a way that this novation fixes one single net amount each time novation applies and thus creates a legally binding, single new contract extinguishing former contracts;

- b) the scheme has a netting arrangement with its counterparty which creates a single legal obligation, covering all included transactions, such that, in the event of the counterparty's failure to perform owing to default, bankruptcy, liquidation or any other similar circumstance, the scheme would have a claim to receive or an obligation to pay only the net sum of the positive and negative mark-to-market values of the individual included transactions;
- c) the manager obtains written and reasoned legal opinions to the effect that, the netting arrangement is legally enforceable by the scheme against its counterparty, and in particular, in the event of a legal challenge, the relevant courts and administrative authorities would find that the scheme's claims and obligations would be limited to the net sum, as described in paragraph 5.15(b), under:
 - i) the law of the jurisdiction in which the counterparty is incorporated and, if a foreign branch of an entity is involved, also under the law of the jurisdiction in which the branch is located;
 - ii) the law that governs the individual included transactions; and
 - iii) the law that governs the netting agreement;
- d) the manager has procedures in place to ensure that the legal validity of the netting arrangement is kept under review in the light of possible changes in the relevant laws; and
- e) the manager is reasonably satisfied that the netting arrangement is legally valid under the law of each of the relevant jurisdictions.

Exchange-traded financial derivatives

- 5.16 Financial derivatives which:
- a) are transacted on an exchange where the clearing house performs a central counterparty role; and
 - b) have trades which are characterised by a daily marked-to-market valuation of the financial derivative positions and subject to at least daily margining, would not be subject to the counterparty limits in paragraph 5.2.

Margins

- 5.17 Any exposure arising from initial margin posted and the variation margin receivable from a counterparty relating to OTC or exchange-traded financial derivatives, which is not protected against insolvency of the counterparty, is to be included in the counterparty limit.

6 Efficient Portfolio Management Techniques

Securities lending and repurchase transactions

- 6.1 A scheme may carry out the following activities for the sole purpose of EPM:
- a) securities lending; and
 - b) repurchase transactions.
- 6.2 The scheme may lend transferable securities and money market instruments:
- a) directly;
 - b) through a standardised lending system facilitated by a clearing house which performs a central counterparty role; or
 - c) through securities lending agents, who are recognised as specialists in securities lending.

- 6.3 Securities lending and repurchase transactions should be effected in accordance with good market practice.

Counterparty

- 6.4 The counterparty to a securities lending agreement or repurchase transaction should:
- a) be a financial institution subject to prudential supervision by a financial supervisory authority in its home jurisdiction; and
 - b) have a minimum long-term rating of A by Moody's, A by Standard and Poor's or A by Fitch (including sub-categories or gradations therein). Alternatively, where the counterparty is not rated, it is acceptable if an entity which has and maintains a rating as stated above indemnifies the scheme against losses suffered as a result of the counterparty's failure.
- 6.5 Where the manager engages in securities lending and repurchase transactions with any of its related corporations, the manager should have effective arrangements in place to manage potential conflicts of interest.
- 6.6 The agreement between the scheme and the counterparty, either directly or through its agent, should require the counterparty to provide additional collateral to the scheme or its agent no later than the close of the next business day if the current value of the eligible collateral tendered is insufficient.

Recognition of collateral

- 6.7 The collateral should meet the following requirements:
- a) it is marked-to-market daily;
 - b) it is liquid;
 - c) it exceeds the value of the transferable securities or money market instruments transferred;
 - d) it is taken into account, on a portfolio basis, for the purposes of the requirements on spread of investments in section 2 of this Appendix A;
 - e) it is not issued by the counterparty or its related corporations;
 - f) it is held by a custodian or agent which is:
 - i) a financial institution subject to prudential supervision by a financial supervisory authority in its home jurisdiction; and
 - ii) independent of the counterparty;
 - g) it is legally secured from the consequences of the failure of the custodian, counterparty or agent and their related corporations;
 - h) it can be fully enforced by the trustee at any time;
 - i) it is free from all prior encumbrances; and
 - j) it cannot be sold or given as security interests.
- 6.8 For the purposes of securities lending and repurchase transactions, collateral may only consist of:
- a) cash;
 - b) money market instruments; or
 - c) bonds.

6.9 For the purpose of paragraph 6.8, money market instruments and bonds should be issued by, or have the benefit of a guarantee from, an entity or trust that has a minimum long-term rating of A by Fitch, A by Moody's or A by Standard and Poor's (including sub-categories or gradations therein) (collectively, "eligible collateral").

6.10 Notwithstanding paragraph 6.8, securitised debt instruments as well as money market instruments or bonds with embedded financial derivatives are not eligible as collateral.

Settlement

6.11 The scheme or its agent should receive eligible collateral before, or simultaneously with, the transfer of ownership of the transferable securities lent.

6.12 Upon termination of the securities lending or repurchase transaction, the eligible collateral may be remitted by the scheme or its agent after, or simultaneously with the restitution of the transferable securities lent.

Reinvestment of collateral

6.13 Collateral obtained in the form of cash by the scheme or its agent may be reinvested subject to the following requirements:

- a) it is invested in financial instruments consistent with paragraphs 6.8 and 6.9;
- b) the investments are taken into account, on a portfolio basis, for the purposes of the requirements on spread of investments in section 2 of this Appendix A;
- c) the investments are held by a custodian which is:
 - i) a financial institution subject to prudential supervision by a financial supervisory authority in its home jurisdiction; and
 - ii) independent of the counterparty;
- d) the investments are legally secured from the consequences of the failure of the custodian, counterparty or agent and their related corporations;
- e) the investments cannot be sold or given as security interests; and
- f) the manager is reasonably satisfied that any investment of cash collateral by the scheme or its agent, will enable the scheme to meet its redemption obligations and other payment commitments.

6.14 Notwithstanding paragraph 6.13, the cash collateral obtained should not be invested in transferable securities issued by, or placed on deposit with, the counterparty or its related corporations.

6.15 Non-cash collateral obtained by the scheme or its agent may not be reinvested.

Liquidity

6.16 The manager should ensure that:

- a) the volume of securities lending or repurchase transactions is kept at an appropriate level; and
- b) the scheme or its agent is entitled to terminate the securities lending or repurchase transaction and request the immediate return of its transferable securities lent without penalty, in a manner which enables the scheme to meet its redemption obligations and other payment commitments.

7 Borrowings

- 7.1 The scheme may borrow, on a temporary basis, for the purposes of meeting redemptions and bridging requirements.
- 7.2 The scheme may only borrow from banks licensed under the Banking Act (Cap. 19), finance companies licensed under the Finance Companies Act (Cap. 108), merchant banks approved as financial institutions under section 28 of the Monetary Authority of Singapore Act (Cap. 186) or any other deposit-taking institution licensed under an equivalent law in a foreign jurisdiction.
- 7.3 The borrowing period should not exceed one month.
- 7.4 Aggregate borrowings for the purposes of paragraph 7.1 should not exceed 10% of the scheme's net asset value at the time the borrowing is incurred.

8 Acceptable Indices

The underlying index should meet the following characteristics:

- a) it has a clearly defined objective or the market or sector which it aims to represent is clearly defined;
- b) it adequately reflects the characteristics of the market or sector which it aims to represent in an appropriate manner;
- c) be investable;
- d) price movements or trading activities of each constituent should not unduly influence the performance of the whole index;
- e) be sufficiently diversified such that:
 - i) the maximum weighting per constituent does not exceed 20%, or
 - ii) where an index is composed solely of constituents which are non-entities, the maximum weighting of a single constituent does not exceed 35% with the remaining constituents each not exceeding 20%; and
- f) be transparent and information on the index is published in an appropriate manner.

9 Use of Related Party Indices

Where the index is constructed by an index provider which is a related corporation of the manager, the manager should have effective arrangements in place to manage potential conflicts of interest.

Appendix B – Financial Statements

SINGAPORE INDEX FUND

(Constituted under a Trust Deed in the Republic of Singapore)

Annual Report to Unitholders for the financial year ended 30 June 2016

A) Fund Performance

Fund Performance/ Benchmark Returns	3 mth % Growth	6 mth % Growth	1 yr % Growth	3 yr Ann Comp Ret	5 yr Ann Comp Ret	10 yr Ann Comp Ret	Since Inception 18 December 1996 Ann Comp Ret
Singapore Index Fund ¹	1.08	- 0.44	- 12.28	- 1.21	0.24	3.82	3.64
Benchmark ²	1.53	0.28	- 11.11	- 0.10	1.35	4.46	3.00

Note: Returns for period in excess of 1 year are annualised. Past performance is not indicative of future performance.

- ¹⁾ The performance returns of the Fund are in Singapore dollars based on a bid-to-bid basis with net dividends reinvested.
- ²⁾ The performance return of the Benchmark is in Singapore dollars with net dividends reinvested. The Benchmark of Singapore Index Fund since inception up to 23 Jan 2001 was the Business Times - Singapore Regional Index. The Benchmark of the Fund since 26 Jan 2001 is the Straits Times Index. The Benchmark was changed due to the change in the investment policy of the Fund to track the Straits Times Index instead of the Business Times - Singapore Regional Index.

For the twelve months ended 30 June 2016, the net asset value of the Fund lost 12.3% in Singapore Dollar terms, compared with the benchmark FTSE Strait Times Index (STI), which fell 11.1% on a total return basis.

Market and Portfolio Review

FY2016 was a turbulent year for the Singapore equity market, with the STI declining from a high of 3373 in July 2015 to a low of 2787 in September 2015, before rising and falling again to a period low of 2533 in January 2016, and recovering to 2841 at the end of June 2016.

For the first half of FY2016, Singapore investor sentiment was buffeted by a slower growth outlook for Singapore, with concerns arising from weak commodity prices and the health of the Chinese economy. The start of the year saw the local market decline amidst increased volatility when Chinese regulatory authorities took steps to rein in margin and other types of leveraged trading in June 2015, and again when the Chinese engineered an unexpected, albeit limited depreciation in the Renminbi later

in August 2015. A market rebound came in the first week of October 2015 when the STI gained 7.4% on the back of a short term rally in crude oil price. However, concerns over the timing of the impending US federal fund rate hike – that eventually took place in December 2015 – and a worsening rout in global commodities reversed any recovery, and continued to weigh on the performance of the equity market over the remaining period.

The second half of the financial year began with a sharp contraction in the markets, as the introduction of ‘market-stabilizing’ circuit breakers by the Chinese authorities in January 2016 led to a sell-off in the A-shares market, followed by a plunge in crude oil prices to the lowest levels in 8 years. In response to heightened global uncertainty and a weakened inflation outlook due to falling oil prices, major central banks stepped in with additional stimulus. The Bank of Japan (BoJ) introduced negative borrowing rates for the first time, while the European Central Bank (ECB) expanded their quantitative easing program to include purchases of corporate bonds, along with further cuts in the Eurozone’s interest rates. As crude oil and commodity prices stabilized, the local equity market recovered and was further buoyed by improving US economic data. The positive momentum however, failed to carry through to May 2016, as investors fretted over the increased likelihood of further Fed rate hikes in June 2016, the rising US Dollar strength, as well as softer Chinese economic data. Towards the end of June 2016, the unexpected Brexit triggered a knee-jerk sell off across major global equity markets. However, investors took advantage of the sell-off to snap up assets, with markets rebounding as a result. Comments by US Fed Chair Janet Yellen saw expectations for additional hikes in US interest rates significantly pushed back.

On the domestic front, Singapore reported economic growth of 2.0% in 2015, largely in line with earlier forecasts by the Ministry of Trade and Industry (“MTI”). On a year-on-year (“YoY”) basis, the economy expanded by 1.8% in 4Q2015 largely due to the growth in the public construction and whole trade segments. For the first three months of 2016, Singapore’s GDP grew by 2.1% YoY, slightly faster than the previous quarter. From the April 2016 Monetary Policy Review, the Singapore economy was projected to expand at a slower pace for 2016 as compared to expectations laid out in the October 2015 policy review. In view of the weakening growth prospects, the Monetary Authority of Singapore (“MAS”) decided to remove the modest and gradual appreciation path of the SGD Nominal Effective Exchange Rate (“S\$NEER”) policy band, in an attempt to maintain price stability and reduce pressure on both inflation and exports. For 2Q2016, the domestic economy expanded by 2.1% YoY, unchanged from 1Q2016. The manufacturing sector, which suffered from six consecutive quarters of contraction, surprised with a growth of 1.1% YoY as compared to a 0.5% decline in the previous quarter. However, growth was largely moderated due to a slowdown in private sector construction activities. The services producing industries grew 1.7% YoY, similar to the rate registered in the preceding quarter.

During the financial year, the STI underwent index reviews in September 2015 and March 2016. In September 2015, due to stricter liquidity requirement, three counters – Jardine Matheson Holdings, Jardine Strategic Holdings and Olam International, were replaced by UOL Group, Yangzijiang Shipbuilding Holdings and SATS Ltd. In the March 2016 review, Noble Group was replaced by CapitaLand Commercial Trust following Noble Group’s failure to meet the required market capitalization eligibility requirements.

In terms of constituent performance over the 12-month reporting period, 5 counters advanced while 25 counters declined. The top 3 performers were Thai Beverage PCL, Jardine Cycle and Carriage and SATS Ltd, which saw gains of 18.95%, 10.27% and 8.16% respectively. The bottom 3 performers were Sembcorp Marine Limited – down 45.42%, Keppel Corp Limited – down 33.09%, and Global Logistics Properties Limited – down 28.66%. Increasing deferrals in contract deliveries, declining order books as well as major clients’ defaults kept both Sembcorp Marine Limited and Keppel Corp Limited share prices under pressure. The domestic banking sector remained under stress on the back of rising pressures on asset quality and profitability. DBS, UOB and OCBC fell by 23.83%, 20.16%, and 14.64% respectively, contributing significantly to the downward movement in the STI. Despite seeing a contraction in exposure to China and receding pressure on Chinese Yuan hedges, the outlook for the local banks remained threatened by the uncertainty surrounding the oil and gas sector.

Market Outlook

In Singapore, the MTI has narrowed its 2016 GDP forecast to 1 – 2%, down from 1 – 3% previously, on the back of weaker global growth outlook. Domestically, the softening of global economic conditions, as well as the continued sluggishness in global trade, could weigh on externally-oriented sectors such as manufacturing, finance and wholesale trade. High oil supply overhang could also threaten a further recovery in oil prices, which would hit the energy as well as the banking industries. However, growth in the infocomm, education as well as health and social services sectors are likely to remain resilient and supportive of the GDP outlook.

The global economic environment is expected to remain difficult for investors in the near term due to volatility in the financial markets as well as geopolitical conflicts and terrorism. In particular, the upcoming US Presidential Elections, the highly awaited rate hike from the US Fed, along with uncertainties from Brexit, a weak macro outlook for China and other emerging economies could impact market confidence.

SINGAPORE INDEX FUND

(Constituted under a Trust Deed in the Republic of Singapore)

B) Investments at fair value and as a percentage of NAV as at 30 June 2016 under review classified by

i) Country	Fair Value \$	% of NAV
Quoted Equities		
China	339,205	0.81
Hong Kong	1,759,795	4.18
Singapore	38,337,888	90.98
Thailand	1,630,174	3.87
	<hr/>	
	42,067,062	99.84
	<hr/>	
Portfolio of investments	42,067,062	99.84
Other net assets	69,081	0.16
	<hr/>	
Total	42,136,143	100.00
	<hr/>	
ii) Industry	Fair Value \$	% of NAV
Quoted Equities		
Consumer Discretionary	2,685,637	6.38
Consumer Staple	3,295,894	7.82
Financials	23,588,957	55.98
Industrials	6,562,534	15.58
Telecommunications	5,934,040	14.08
	<hr/>	
	42,067,062	99.84
	<hr/>	
Portfolio of investments	42,067,062	99.84
Other net assets	69,081	0.16
	<hr/>	
Net assets attributable to unitholders	42,136,143	100.00
	<hr/>	

B) Investments at fair value and as a percentage of NAV as at 30 June 2016 under review classified by

iii) Asset Class

	Fair value at 30 June 2016 \$	Percentage of total net assets at 30 June 2016 %	Percentage of total net assets at 30 June 2015 %
Quoted Equities	42,067,062	99.84	100.02
Quoted Derivatives	-	-	0.03
Other net assets	69,081	0.16	(0.05)
Total	42,136,143	100.00	100.00

iv) Credit rating of debt securities

Not Applicable

C) Top Ten Holdings

The top ten holdings as at 30 June 2016 and 30 June 2015

10 largest holdings at 30 June 2016

	Fair Value \$	Percentage of total net assets attributable to unitholders %
Singapore Telecommunications Limited	5,526,312	13.12
Oversea-Chinese Banking Corporation	5,167,448	12.26
DBS Group Holdings Limited	5,135,648	12.19
United Overseas Bank Limited	4,048,661	9.61
Hongkong Land Holdings Limited	1,759,795	4.18
Thai Beverages PCL	1,630,174	3.87
Keppel Corporation Limited	1,434,125	3.40
Capitaland Limited	1,424,787	3.38
Wilmar International Limited	1,254,774	2.98
Singapore Press Holdings Limited	1,150,240	2.73

C) Top Ten Holdings (continued)

10 largest holdings at 30 June 2015

	Fair Value \$	Percentage of total net assets attributable to unitholders %
DBS Group Holdings Limited	10,112,569	12.87
Oversea-Chinese Banking Corporation	8,796,904	11.20
Singapore Telecommunications Limited	8,450,691	10.76
United Overseas Bank Limited	7,606,110	9.68
Jardine Matheson Holdings Limited	5,127,371	6.53
Hongkong Land Holdings Limited	3,556,403	4.53
Keppel Corporation Limited	3,216,075	4.09
Jardine Strategic Holdings Limited	2,506,651	3.19
Capitaland Limited	2,436,350	3.10
Global Logistic Properties Limited	2,116,851	2.69

D) Exposure to Derivatives

i) Fair value of derivative contracts and as a percentage of NAV as at 30 June 2016

Not applicable

ii) Net gain/(loss) on derivative contracts realised during the financial year ended 30 June 2016

Not applicable

iii) Net gain/(loss) on outstanding derivative contracts marked to market as at 30 June 2016

Not applicable

E) Investments in other unit trusts, mutual funds and collective investment schemes as at 30 June 2016

	Fair value at 30-Jun-16 \$	Percentage of total net assets attributable to unitholders at 30-Jun-16 %
Ascendas Real Estate Investment Trust	994,232	2.36
Capitaland Commercial Trust	540,587	1.28
Capitamall Trust Real Estate Investment Trust	1,034,648	2.46

F) Amount and percentage of borrowings to net asset value (NAV) as at 30 June 2016

Not applicable

G) Amount of subscriptions and redemptions for the period 01 July 2015 to 30 June 2016

Total amount of subscriptions	SGD	-
Total amount of redemptions	SGD	26,238,592

H) Amount of related party transactions for the period 01 July 2015 to 30 June 2016

Please refer to Note 9 of the Notes to the Financial Statements on page 31.

I) Expense Ratios

30 June 2016	1.04%
30 June 2015	0.91%

Note: The expense ratio has been computed based on the guidelines laid down by the Investment Management Association of Singapore ("IMAS"). The calculation of the expense ratio at 30 June 2016 was based on total operating expenses of \$683,231 (2015: \$734,084) divided by the average net asset value of \$65,677,251 (2015: \$80,691,001) for the year. The total operating expenses do not include (where applicable) brokerage and other transactions costs, performance fee, interest expense, distribution paid out to unitholders, foreign exchange gain/loss, front or back end loads arising from the purchase or sale of other funds and tax deducted at source or arising out of income received. The Fund does not pay any performance fee. The average net asset value is based on the daily balances.

J) Turnover ratios

30 June 2016	13.38%
30 June 2015	6.28%

Note: The portfolio turnover ratio is calculated in accordance with the formula stated in the Code on Collective Investment Schemes. The calculation of the portfolio turnover ratio was based on the lower of the total value of purchases or sales of the underlying investments, being purchases of \$8,789,095 (2015: purchases of \$5,065,763) divided by the average daily net asset value of \$65,677,251 (2015: \$80,691,001).

K) Other material information

There is no material information that will adversely impact the valuation of the Fund.

L) Supplemental information on underlying sub-funds where the scheme invests more than 30% of its deposited property in another scheme

Not applicable

M) Soft dollar commissions/arrangements received by the Manager

Under the Code, the Manager may receive soft dollar commissions or arrangements when such commissions or arrangements can reasonably be expected to assist in providing investment advice to the customer, when best execution is carried out for the transaction, and provided the Manager does not enter into unnecessary trades to achieve a sufficient volume of transactions to qualify for soft dollars.

The soft dollar commissions / arrangements which the Manager may receive or enter into are limited to the following kinds of services: specific advice as to the advisability of dealing in, or of the value of any investments; research and advisory services; economic and political analysis; portfolio analysis including valuation and portfolio measurements; market analysis; data and quotation services; computer hardware or software that are used to support the investment decision making process, the giving of advice, or the conduct of research or analysis; and custodial services in relation to the investments managed for clients.

The receipt of goods and services such as travel, accommodation and entertainment that does not meet the conditions above is prohibited.

The Manager confirms that they are fully compliant with the Code and other relevant industry standards.

N) Where the scheme offers pre-determined payouts, an explanation on the calculation of the actual payouts received by participants and any significant deviation from the pre-determined payouts

Not applicable

SINGAPORE INDEX FUND

(Constituted under a Trust Deed in the Republic of Singapore)

REPORT OF THE TRUSTEE

The Trustee is under a duty to take into custody and hold the assets of Singapore Index Fund (the "Fund") in trust for the unitholders. In accordance with the Securities and Futures Act (Cap. 289), its subsidiary legislation and the Code on Collective Investment Schemes, the Trustee shall monitor the activities of the Manager for compliance with the limitations imposed on the investment and borrowing powers as set out in the Trust Deed in each annual accounting period and report thereon to unitholders in an annual report.

To the best knowledge of the Trustee, the Manager has, in all material respects, managed the Fund during the year covered by these financial statements, set out on pages 13 to 32, in accordance with the limitations imposed on the investment and borrowing powers set out in the Trust Deed.

For and on behalf of the Trustee
HSBC INSTITUTIONAL TRUST SERVICES (SINGAPORE) LIMITED

Authorised signatory

Date

SINGAPORE INDEX FUND

(Constituted under a Trust Deed in the Republic of Singapore)

STATEMENT BY THE MANAGER

In the opinion of the directors of Singapore Consortium Investment Management Limited, the accompanying financial statements set out on pages 13 to 32, comprising the Statement of Total Return, Statement of Financial Position, Statement of Movements of Unitholders' Funds, Statement of Portfolio and Notes to the Financial Statements are drawn up so as to present fairly, in all material respects, the financial position of the Singapore Index Fund (the "Fund") as at 30 June 2016 and the total deficit and changes in unitholders' funds for the year then ended in accordance with the recommendations of Statement of Recommended Accounting Practice 7 "Reporting Framework for Unit Trusts" issued by the Institute of Singapore Chartered Accountants. At the date of this statement, there are reasonable grounds to believe that the Fund will be able to meet its financial obligations as and when they materialise.

For and on behalf of the Manager
SINGAPORE CONSORTIUM INVESTMENT MANAGEMENT LIMITED

CHAIRMAN & CEO

Date

SINGAPORE INDEX FUND

(Constituted under a Trust Deed in the Republic of Singapore)

INDEPENDENT AUDITOR'S REPORT TO THE UNITHOLDERS OF SINGAPORE INDEX FUND

We have audited the financial statements of Singapore Index Fund (the "Fund"), which comprise the Statement of Financial Position and Statement of Portfolio as at 30 June 2016, the Statement of Total Return and Statement of Movements of Unitholders' Funds for the year then ended, and a summary of significant accounting policies and other explanatory information, as set out on pages 13 to 32.

Manager's Responsibility for the Financial Statements

The Fund's Manager (the "Manager") is responsible for the preparation and fair presentation of these financial statements in accordance with the recommendations of Statement of Recommended Accounting Practice 7 "Reporting Framework for Unit Trusts" issued by the Institute of Singapore Chartered Accountants, and for such internal control as the Manager determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these financial statements based on our audit. We conducted our audit in accordance with Singapore Standards on Auditing. Those standards require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgement, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the Fund's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Fund's internal control. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of accounting estimates made by the Manager, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, the financial statements present fairly, in all material respects, the financial position of the Fund as at 30 June 2016 and the total deficit for the year then ended in accordance with the recommendations of Statement of Recommended Accounting Practice 7 "Reporting Framework for Unit Trusts" issued by the Institute of Singapore Chartered Accountants.

PricewaterhouseCoopers LLP
Public Accountants and Chartered Accountants

Singapore,

Date

SINGAPORE INDEX FUND

(Constituted under a Trust Deed in the Republic of Singapore)

STATEMENT OF TOTAL RETURN

For the financial year ended 30 June 2016

	Note	2016 \$	2015 \$
Income			
Dividends		2,588,318	2,682,337
Less: Expenses			
Audit fee		25,569	27,001
Bank charges		1,293	55
Custody fees	9	29,014	36,438
Management fees	9	418,499	506,491
Printing expenses		16,986	12,001
Professional fees		72,271	37,152
Registrar fees	9	29,893	29,854
Trustee fees	9	43,211	49,820
Accounting and Valuation fees	9	4,375	-
Transaction cost		51,966	31,960
Miscellaneous expenses		42,120	35,282
		735,197	766,054
Net income		1,853,121	1,916,283
Net gain or loss on value of investments			
Net (loss)/gain on investments		(11,956,539)	1,443,479
Net foreign exchange loss		(46,646)	(12,285)
		(12,003,185)	1,431,194
Total (deficit)/return for the year before income tax		(10,150,064)	3,347,477
Less: Income tax	3	(35,616)	(33,273)
Total (deficit)/return for the year		(10,185,680)	3,314,204

The accompanying notes form an integral part of these financial statements.

SINGAPORE INDEX FUND

(Constituted under a Trust Deed in the Republic of Singapore)

STATEMENT OF FINANCIAL POSITION

As at 30 June 2016

	Note	2016 \$	2015 \$
ASSETS			
Portfolio of investments		42,067,062	78,600,258
Receivables	5	-	21,595
Cash and bank balances	9	251,611	154,519
Total Assets		42,318,673	78,776,372
LIABILITIES			
Payables	6	182,530	215,957
Total Liabilities		182,530	215,957
EQUITY			
Net assets attributable to unitholders	7	42,136,143	78,560,415

The accompanying notes form an integral part of these financial statements.

SINGAPORE INDEX FUND

(Constituted under a Trust Deed in the Republic of Singapore)

STATEMENT OF MOVEMENTS OF UNITHOLDERS' FUNDS

For the financial year ended 30 June 2016

	Note	2016 \$	2015 \$
Net assets attributable to unitholders at the beginning of the financial year		78,560,415	81,824,479
Operations			
Change in net assets attributable to unitholders resulting from operations		(10,185,680)	3,314,204
Unitholders' contributions/(withdrawals)			
Cancellation of units		(26,238,592)	(6,578,268)
Change in net assets attributable to unitholders resulting from net creation and cancellation of units		(26,238,592)	(6,578,268)
Total decrease in net assets attributable to unitholders		(36,424,272)	(3,264,064)
Net assets attributable to unitholders at the end of the financial year	7	42,136,143	78,560,415

The accompanying notes form an integral part of these financial statements.

SINGAPORE INDEX FUND

(Constituted under a Trust Deed in the Republic of Singapore)

STATEMENT OF PORTFOLIO

As at 30 June 2016

	Holdings at 30 June 2016	Fair value at 30 June 2016 \$	Percentage of total net assets attributable to unitholders at 30 June 2016 %
By Industry - (Primary)*			
Quoted Equities			
Consumer Discretionary			
Genting Singapore Public Limited Company	1,097,500	795,688	1.89
Jardine Cycle & Carriage Limited	20,266	739,709	1.76
Singapore Press Holdings Limited	291,200	1,150,240	2.73
Total		2,685,637	6.38
Consumer Staple			
Golden Agri-Resources Limited	1,174,132	410,946	0.97
Thai Beverages PCL	1,791,400	1,630,174	3.87
Wilmar International Limited	384,900	1,254,774	2.98
Total		3,295,894	7.82
Financials			
Ascendas Real Estate Investment Trust	400,900	994,232	2.36
Capitaland Commercial Trust	366,500	540,587	1.28
Capitaland Limited	464,100	1,424,787	3.38
Capitamall Trust Real Estate Investment Trust	485,750	1,034,648	2.46
City Developments Limited	108,080	879,771	2.09
DBS Group Holdings Limited	325,866	5,135,648	12.19
Global Logistic Properties Limited	546,700	986,794	2.34
Hongkong Land Holdings Limited	214,700	1,759,795	4.18
Oversea-Chinese Banking Corporation	594,643	5,167,448	12.26
Singapore Exchange Limited	150,600	1,147,572	2.72
United Overseas Bank Limited	219,797	4,048,661	9.61
UOL Group Limited	85,900	469,014	1.11
Total		23,588,957	55.98

* The classification by industry sector is based upon Global Industry Classification Standard (GICS) developed by Morgan Stanley Capital International (MSCI).

The accompanying notes form an integral part of these financial statements.

SINGAPORE INDEX FUND

(Constituted under a Trust Deed in the Republic of Singapore)

STATEMENT OF PORTFOLIO

As at 30 June 2016

	Holdings at 30 June 2016	Fair value at 30 June 2016 \$	Percentage of total net assets attributable to unitholders at 30 June 2016 %
By Industry - (Primary)* (continued)			
Quoted Equities			
Industrials			
ComfortDelgro Corporation Limited	372,800	1,025,200	2.43
Hutchison Port Holdings Trust	924,000	565,843	1.34
Keppel Corporation Limited	260,750	1,434,125	3.40
SATS Limited	115,200	473,472	1.13
Sembcorp Industries Limited	163,040	459,773	1.09
Sembcorp Marine Limited	152,100	235,755	0.56
SIA Engineering Company Limited	40,800	150,144	0.36
Singapore Airlines Limited	92,140	982,212	2.33
Singapore Technologies Engineering Yangzijiang Shipbuilding Holdings Limited	284,700 379,000	896,805 339,205	2.13 0.81
Total		6,562,534	15.58

* The classification by industry sector is based upon Global Industry Classification Standard (GICS) developed by Morgan Stanley Capital International (MSCI).

The accompanying notes form an integral part of these financial statements.

SINGAPORE INDEX FUND

(Constituted under a Trust Deed in the Republic of Singapore)

STATEMENT OF PORTFOLIO

As at 30 June 2016

	Holdings at 30 June 2016	Fair value at 30 June 2016 \$	Percentage of total net assets attributable to unitholders at 30 June 2016 %
By Industry - (Primary)* (continued)			
Quoted Equities			
Telecommunications			
Singapore Telecommunications Limited	1,338,090	5,526,312	13.12
Starhub Limited	107,580	407,728	0.96
Total		5,934,040	14.08
Total Quoted Equities		42,067,062	99.84
Portfolio of investments		42,067,062	99.84
Other net assets		69,081	0.16
Net assets attributable to unitholders		42,136,143	100.00

* The classification by industry sector is based upon Global Industry Classification Standard (GICS) developed by Morgan Stanley Capital International (MSCI).

The accompanying notes form an integral part of these financial statements.

SINGAPORE INDEX FUND

(Constituted under a Trust Deed in the Republic of Singapore)

STATEMENT OF PORTFOLIO

As at 30 June 2016

	Percentage of total net assets attributable to unitholders at 30 June 2016 %	Percentage of total net assets attributable to unitholders at 30 June 2015 %
By Industry (Primary)* (Summary)		
Quoted Equities		
Consumer Discretionary	6.38	5.45
Consumer Staple	7.82	6.27
Financials	55.98	51.98
Industrials	15.58	24.76
Telecommunications	14.08	11.56
	99.84	100.02
Quoted Derivatives		
Consumer Discretionary	-	0.03
Portfolio of investments	99.84	100.05
Other net assets/(liabilities)	0.16	(0.05)
Net assets attributable to unitholders	100.00	100.00

* The classification by industry sector is based upon Global Industry Classification Standard (GICS) developed by Morgan Stanley Capital International (MSCI).

The accompanying notes form an integral part of these financial statements.

SINGAPORE INDEX FUND

(Constituted under a Trust Deed in the Republic of Singapore)

STATEMENT OF PORTFOLIO*As at 30 June 2016*

	Fair value at 30 June 2016 \$	Percentage of total net assets attributable to unitholders at 30 June 2016 %	Percentage of total net assets attributable to unitholders at 30 June 2015 %
By Geography - Secondary* Quoted Equities			
China	339,205	0.81	-
Hong Kong	1,759,795	4.18	15.47
Singapore	38,337,888	90.98	81.93
Thailand	1,630,174	3.87	2.62
	42,067,062	99.84	100.02
Quoted Derivatives			
Singapore	-	-	0.03
Portfolio of investments	42,067,062	99.84	100.05
Other net assets/(liabilities)	69,081	0.16	(0.05)
Net assets attributable to unitholders	42,136,143	100.00	100.00

* The geography classification is based on country of domicile of the investee companies.

The accompanying notes form an integral part of these financial statements.

SINGAPORE INDEX FUND

(Constituted under a Trust Deed in the Republic of Singapore)

NOTES TO THE FINANCIAL STATEMENTS

For the financial year ended 30 June 2016

These notes form an integral part of and should be read in conjunction with the accompanying financial statements.

1. GENERAL

Singapore Index Fund (the "Fund") is a Singapore registered trust fund constituted by a Trust Deed dated 12 November 1996 together with its Supplemental Deeds thereon (hereafter referred to as "Trust Deed") between Singapore Consortium Investment Management Limited (the "Manager") and HSBC Institutional Trust Services (Singapore) Limited (the "Trustee"). The Trust Deed is governed by the laws of the Republic of Singapore.

On 29 December 2015, the Manager was acquired by Allgrace Investment Management Private Limited

The primary activity of the Fund is investment trading. The Fund's investment objective is to achieve medium to long term capital appreciation by investing in the component securities of the Straits Times Index (STI). While the Fund will aim to follow the STI as closely as possible, the Fund's performance will not be able to exactly match the performance of the STI due to, among others, operating expenses.

Subscriptions and redemptions of the units are denominated in Singapore Dollars.

2. SIGNIFICANT ACCOUNTING POLICIES

(a) Basis of accounting

The financial statements have been prepared under the historical cost convention, modified by the revaluation of financial assets at fair value through profit or loss, and in accordance with the recommendations of Statement of Recommended Accounting Practice 7 "Reporting Framework for Unit Trusts" (RAP7) issued by the Institute of Singapore Chartered Accountants.

(b) Recognition of income

Dividend income is recognised when the right to receive payment is established. Interest income is recognised on a time proportion basis using the effective interest method.

2. SIGNIFICANT ACCOUNTING POLICIES (continued)

(c) Investments

Investments are classified as financial assets at fair value through profit or loss.

(i) Initial recognition

Purchase of investments are recognised on the trade date. Investments are recorded at fair value on initial recognition.

(ii) Subsequent measurement

Investments are subsequently carried at fair value. Net changes in fair value on investments are included in the Statement of Total Return in the year in which they arise.

(iii) Derecognition

Investments are derecognised on the trade date of disposal. The resultant realised gain and loss on the sale of investments are computed on the basis of the difference between the weighted average carrying amount and selling price gross of transaction costs, and are taken up in the Statement of Total Return.

(d) Basis of valuation of investments

The fair value of financial assets and liabilities traded in active markets is based on quoted market prices at the close of trading on the reporting date. The quoted market price used for investments held by the Fund is the last traded market price for both financial assets and financial liabilities where the last traded price falls within the bid-ask spread. In circumstances where the last traded price is not within the bid-ask spread, the Manager will determine the point within the bid-ask spread that is most representative of fair value.

The fair value of investments held in underlying funds is the quoted net asset value of the underlying fund as determined by the underlying fund's administrator. Net changes in fair value of investments are included in the Statement of Total Return in the year in which they arise.

(e) Foreign currency translation

(i) Functional and presentation currency

The Fund operates from Singapore with the subscriptions and redemptions of the units denominated in Singapore Dollars.

The performance of the Fund is measured and reported to the investors in Singapore Dollars. The Manager considers the Singapore Dollars as the currency of the primary economic environment in which the Fund operates. The financial statements are presented in Singapore Dollars ('\$'), which is the Fund's functional and presentation currency.

2 SIGNIFICANT ACCOUNTING POLICIES (continued)

(e) Foreign currency translation (continued)

(ii) Transactions and balances

Foreign currency transactions are translated into the functional currency using the exchange rates prevailing at the dates of the transactions. Foreign exchange gain and loss resulting from the settlement of such transactions and from the translation at year-end exchange rates of monetary assets and liabilities denominated in foreign currencies are recognised in the Statement of Total Return. Translation differences on non-monetary financial assets and liabilities such as equity are also recognised in the Statement of Total Return within the net gain or loss on investments.

(f) Receivables

Receivables are non-derivative financial assets with fixed or determinable payments that are not quoted in an active market. Receivables are classified within "Cash and bank balances" and "Receivables". Receivables are initially recognised at fair value plus transaction cost and subsequently carried at amortised cost using the effective interest method less impairment.

(g) Payables

Payables are initially recognised at fair value, and subsequently carried at amortised cost, using the effective interest method.

3. INCOME TAX

	2016 \$	2015 \$
Singapore income tax	35,616	33,273

The Fund was granted the status of a Designated Unit Trust ("DUT") in Singapore. Under the DUT Scheme, subject to certain conditions and reporting obligations being met, certain income of the DUT Fund is not taxable in accordance with Sections 35(12) and 35(12A) of the Income Tax Act. Such income includes:

- (i) gains or profits derived from Singapore or elsewhere from the disposal of securities;
- (ii) interest (other than interest for which tax has been deducted under Section 45 of the Singapore Income Tax Act);
- (iii) dividends derived from outside Singapore and received in Singapore;

3. INCOME TAX (continued)

- (iv) gains or profits derived from foreign exchange transactions, transactions in future contracts, transactions in interest rate or currency forwards, swaps or option contracts and transactions in forwards, swaps or option contracts relating to any securities or financial index;
- (v) discount, prepayment fee, redemption premium and break cost from qualifying debt securities issued during the prescribed period; and
- (vi) distributions from foreign unit trusts derived from outside Singapore and received in Singapore.

The Singapore income tax represents tax deducted at source for Singapore sourced dividends.

4. DISTRIBUTION

The Manager has not proposed any distribution to unitholders for the financial year ended 30 June 2016 and 30 June 2015.

5. RECEIVABLES

	2016 \$	2015 \$
Other receivables	-	21,595

6. PAYABLES

	2016 \$	2015 \$
Amount due to Manager	97,527	136,093
Amount due to Trustee	10,345	13,734
Other accruals for operating expenses	74,658	66,130
	182,530	215,957

7. UNITS IN ISSUE

During the year ended 30 June 2016 and 2015, the number of units issued, redeemed and outstanding were as follows:

	2016	2015
Units at the beginning of the financial year	35,696,918	38,734,283
Units cancelled	(13,870,738)	(3,037,365)
Units at the end of the financial year	21,826,180	35,696,918
Net assets attributable to unitholders (\$)	42,136,143	78,560,415
Net asset value per unit (\$)	1.930	2.200

7. UNITS IN ISSUE (continued)

A reconciliation of the net assets attributable to unitholders per unit per the financial statements and the net assets attributable per unit for issuing/redeeming units at the financial year end date is presented below:

	2016 \$	2015 \$
Net assets attributable to unitholders per financial statements	1.930	2.200
Effect for movement in the net asset value between the last dealing date and the end of the reporting period*	-	0.000#
Net assets attributable to unitholders for issuing/redeeming	<u>1.930</u>	<u>2.200</u>

* The net asset value for the purpose of processing unit subscription and redemption was established in accordance with the methodology indicated in the Fund's Prospectus. This item reflects the movement in net asset value between such date and the end of the reporting period.

indicates an effect of less than \$0.001 per unit.

8. FINANCIAL RISK MANAGEMENT

The Fund's activities expose it to a variety of financial risk (including currency risk, interest rate risk and price risk), credit risk and liquidity risk. The Fund's overall risk management programme seeks to minimise potential adverse effects on the Fund's financial performance. The Fund may use financial futures contracts, financial options contracts and/or currency forward contracts subject to the terms of the Prospectus to moderate certain risk exposures.

The Fund's assets principally consist of financial instruments such as equity investments, money market investments and cash. They are held in accordance with the published investment policies of the Fund. The allocation of assets between the various types of investments is determined by the Manager to achieve their investment objectives.

8. FINANCIAL RISK MANAGEMENT (continued)

(a) Market risk

Market risk is the risk of loss arising from uncertainty concerning movements in market prices and rates, including observable variables such as interest rates, credit spreads, exchange rates, and others that may be only indirectly observable such as volatilities and correlations. Market risk includes such factors as changes in economic environment, consumption pattern and investor's expectation etc. which may have significant impact on the value of the investments. The Fund's investments are substantially dependent on changes in market prices. The Fund's investments are monitored by the Manager on a regular basis so as to assess changes in fundamentals and valuation. Although the Manager makes reasonable efforts in the choice of investments, events beyond reasonable control of the Manager could affect the prices of the underlying investments and hence the asset value of the Fund.

(i) Foreign exchange risk

The Fund has monetary financial assets and liabilities denominated in currencies other than Singapore Dollars and it may be affected favourably or unfavourably by exchange rate regulations or changes in the exchange rates between Singapore Dollars and such other currencies. The Manager may at his discretion, implement a currency management strategy either to reduce currency volatility or to hedge the currency exposures of the Fund.

The table below summarises the Fund's exposure to foreign currencies as at the end of the financial year.

As at 30 June 2016	SGD \$	USD \$	Total \$
<u>ASSETS</u>			
Portfolio of investments	39,741,424	2,325,638	42,067,062
Cash and bank balances	146,926	104,685	251,611
Total Assets	39,888,350	2,430,323	42,318,673
<u>LIABILITIES</u>			
Payables	182,530	-	182,530
Total Liabilities	182,530	-	182,530
Net currency exposure		2,430,323	

8. FINANCIAL RISK MANAGEMENT (continued)

(a) Market risk (continued)

(i) Foreign exchange risk (continued)

As at 30 June 2015	SGD \$	USD \$	Total \$
<u>ASSETS</u>			
Portfolio of investments	66,233,587	12,366,671	78,600,258
Receivables	21,595	-	21,595
Cash and bank balances	154,519	-	154,519
Total Assets	66,409,701	12,366,671	78,776,372
<u>LIABILITIES</u>			
Payables	215,957	-	215,957
Total Liabilities	215,957	-	215,957
Net currency exposure		12,366,671	

Investments, which is the significant item in the Statement of Financial Position, is exposed to currency risk and other price risk. The other price risk sensitivity analysis includes the impact of currency risk on non-monetary investments. The Fund's net financial assets comprise significantly non-monetary investments. Hence, currency risk sensitivity analysis has not been performed on the remaining financial assets.

(ii) Price risk

Price risk is the risk of potential adverse changes to the value of financial investments because of changes in market conditions and volatility in security prices. The Fund is designated to track the performance of the Straits Times Index, therefore the exposure to price risk in the Fund will be substantially the same as the Straits Times Index. As an exchange traded fund, the Manager manages the Fund's exposure to price risk by ensuring the key characteristics of the portfolio, such as security weight and industry weight, is closely aligned to the Straits Times Index characteristics.

If the Straits Times Index at 30 June 2016 had increased or decreased by 20% (30 June 2015: 20%) with all other variables held constant, this would have increased or decreased respectively the net asset value and return for the year by approximately 20% (30 June 2015: 20%).

8. FINANCIAL RISK MANAGEMENT (continued)

(a) Market risk (continued)

(iii) Interest rate risk

Interest rate risk is the risk that the value of a financial instrument will fluctuate due to changes in market interest rates.

Investment funds that invest in equity securities may be subject to interest rate risk as any interest rate change may affect the equity risk premium though at varying degrees. However, the effects of changes in interest rates on the Fund's portfolio may not be quantified as the relationship between the interest rates and the value of equity securities is indirect.

Other than cash and bank balances which are subjected to insignificant interest rate risk, the Fund's financial assets and liabilities are largely non-interest bearing.

Hence, no sensitivity analysis has been presented separately.

(b) Liquidity risk

The Fund is exposed to daily cash redemptions and disbursements for the settlements of purchases. The Manager therefore ensures that the Fund maintains sufficient cash and cash equivalents and that it is able to obtain cash from the sale of investments held to meet its liquidity requirements. Reasonable efforts will be taken to invest in securities which are traded in a relatively active market and which can be readily disposed of.

The Fund's investments in listed securities are considered to be readily realisable as they are listed on established regional stock exchanges.

The Manager may from time to time employ derivatives to implement a portfolio strategy to reduce risk or for the purpose of efficient portfolio management. Market liquidity of complex derivatives are significantly less than traditional investment instruments and such positions may therefore require a longer time to reverse than what would be typically expected for traditional investment instruments. No such instruments were held as at the end of the financial year.

The maturity profile of payables and net assets attributable to unitholders based on undiscounted cash flows is less than 1 year (30 June 2015: less than 1 year). The units are redeemable on demand at the holder's option subject to terms and conditions for redemption.

8. FINANCIAL RISK MANAGEMENT (continued)

(c) Credit risk

The Fund takes on exposure to credit risk, which is the risk that a counterparty will be unable to pay amounts in full when due. The Fund's credit risk is concentrated on cash and bank balances, and amounts or securities receivable on the sale and purchase of investments respectively. In order to mitigate exposure to credit risk, all transactions in listed securities are settled/paid for upon delivery and transacted with approved counterparties using an approved list of brokers that are regularly assessed and updated by the Manager.

As the Fund does not hold any collateral, the maximum exposure to credit risk for each class of financial instruments is the carrying amount of that class of financial instruments presented on the Statement of Financial Position.

The Fund's financial assets are neither past due nor impaired, representing cash and bank balances and receivables. Bank deposits and all the investments are held with a bank and a custodian respectively, that are part of HSBC Group with a credit rating assigned by Fitch at 30 June 2016 is aa- (30 June 2015: aa-). The credit rating is based on the Viability rating published by the rating agency. Receivables are substantially from companies with good collection track record with the Fund.

(d) Capital management

The Fund's capital is represented by the net assets attributable to unitholders as the Fund does not have any gearing. The Fund strives to invest the subscriptions of redeemable participating units in investments that meet the Fund's investment objectives.

(e) Fair value estimation

The Fund classifies fair value measurements using a fair value hierarchy that reflects the significance of the inputs used in making the measurements. The fair value hierarchy has the following levels:

- Quoted prices (unadjusted) in active markets for identical assets or liabilities (Level 1).
- Inputs other than quoted prices included within level 1 that are observable for the asset or liability, either directly (that is, as prices) or indirectly (that is, derived from prices) (Level 2).
- Inputs for the asset or liability that are not based on observable market data (that is, unobservable inputs) (Level 3).

8. FINANCIAL RISK MANAGEMENT (continued)

(e) Fair value estimation (continued)

The following table analyses within the fair value hierarchy the Fund's financial assets and liabilities (by class) measured at fair value at 30 June 2016 and 2015:

As at 30 June 2016	Level 1	Level 2	Level 3	Total
	\$	\$	\$	\$
Assets				
Financial assets at fair value through profit or loss				
- Quoted equities	42,067,062	-	-	42,067,062
<hr/>				
As at 30 June 2015	Level 1	Level 2	Level 3	Total
	\$	\$	\$	\$
Assets				
Financial assets at fair value through profit or loss				
- Quoted equities	78,577,808	-	-	78,577,808
- Quoted derivatives	-	22,450	-	22,450
	78,577,808	22,450	-	78,600,258
<hr/>				

Investments whose values are based on quoted market prices in active markets, and therefore classified within level 1, comprise active listed equities. The Fund does not adjust the quoted price for these instruments.

Financial instruments that trade in markets not considered to be active but are valued based on quoted market prices, dealer quotations or alternative pricing sources supported by observable inputs are classified within level 2.

9. RELATED PARTY TRANSACTIONS

- (a) The Manager and the Trustee of the Fund are Singapore Consortium Investment Management Limited and HSBC Institutional Trust Services (Singapore) Limited respectively. HSBC Institutional Trust Services (Singapore) Limited is a subsidiary of HSBC Holdings plc.

Management fee is paid to the Manager. Trustee fee is paid to the Trustee. These fees paid or payable by the Fund are shown in the Statement of Total Return and are on terms set out in the Trust Deed. All other related party transactions are shown elsewhere in the financial statements.

- (b) As at the end of the financial year, the Fund maintained current accounts with HSBC Group as follows:

	2016	2015
	\$	\$
Bank balances	251,611	154,519

- (c) In addition to related party information shown elsewhere in the financial statements, the following significant transactions took place during the financial year between the Fund and related parties at terms agreed between the parties and within the provisions of the Trust Deed.

	2016	2015
	\$	\$
Accounting and valuation fee expense charged by a related company of the Trustee	4,375	-
Transaction fee expense charged by the Trustee and its related company	7,710	11,280
Custody fee expense charged by a related company of the Trustee	29,014	36,438
Interest expense paid to a bank which is the related company of the Trustee	-	10
Registration fee expense charged by a related company of the Trustee	29,893	29,854

10. FINANCIAL RATIOS

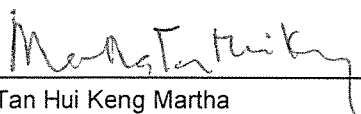
	2016	2015
Expense ratio ¹	1.04%	0.91%
Turnover ratio ²	13.38%	6.28%

- The expense ratio has been computed based on the guidelines laid down by the Investment Management Association of Singapore (“IMAS”). The calculation of the expense ratio at 30 June 2016 was based on total operating expenses of \$683,231 (2015: \$734,084) divided by the average net asset value of \$65,677,251 (2015: \$80,691,001) for the year. The total operating expenses do not include (where applicable) brokerage and other transactions costs, performance fee, interest expense, distribution paid out to unitholders, foreign exchange gain/loss, front or back end loads arising from the purchase or sale of other funds and tax deducted at source or arising out of income received. The Fund does not pay any performance fee. The average net asset value is based on the daily balances.
- The portfolio turnover ratio is calculated in accordance with the formula stated in the Code on Collective Investment Schemes. The calculation of the portfolio turnover ratio was based on the lower of the total value of purchases or sales of the underlying investments, being purchases of \$8,789,095 (2015: purchases of \$5,065,763) divided by the average daily net asset value of \$65,677,251 (2015: \$80,691,001).

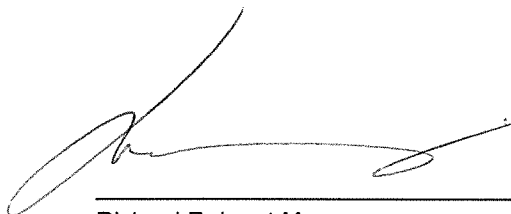
Singapore Index Fund
Prospectus lodged with the Monetary Authority of Singapore on or about 30 September 2016



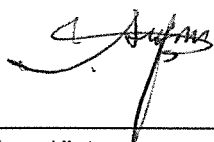
Boon Swan Foo
Director



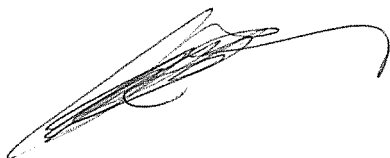
Tan Hui Keng Martha
Director



Richard Rokmat Magnus
Director



See Yong Kiat
Director



Frederick Lai Yao Long
Director
