# RESPONSE TO CONSULTATION PAPER

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| **Consultation topic:** | Consultation Paper on Proposed Revisions to the Regulatory Framework for Large Exposures of Singapore-Incorporated Banks |
| **Name1/Organisation:**  1if responding in a personal capacity |  |
| **Contact number for any clarifications:** |  |
| **Email address for any clarifications:** |  |
| **Confidentiality** | |
| I wish to keep the following confidential: | *(Please indicate any parts of your submission you would like to be kept confidential, or if you would like your identity along with the whole submission to be kept confidential. Your contact information will not be published.)* |

**General comments:**

**Question 1. MAS seeks comments on the proposal to tighten the large exposures limit from 25% of eligible total capital to 25% of Tier 1 capital.**

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

**Question 2. MAS seeks comments on the proposal to subject exposures to banks (except for intraday interbank exposures) to the large exposures limit.**

**Question 3. MAS seeks comments on the proposal to exempt exposures to a related corporation of the Singapore-incorporated bank that is a bank or its parent financial holding company, except exposures to the Singapore-incorporated bank’s subsidiaries which are banks with residual maturity exceeding one year.**

**Question 4. MAS seeks comments on the proposed limit of 15% of Tier 1 capital for a Singapore-headquartered G-SIB’s exposures to another G-SIB, and the requirement to set internal limits for exposures to other systemically important financial institutions.**

**Question 5. MAS seeks comments on the proposal to require a bank to assess possible financially-dependent counterparties in all cases where the exposures to a counterparty exceeds 5% of Tier 1 capital.**

**Question 6. MAS seeks comments on the proposed criteria under paragraphs 4.4 and 4.6 for assessing connectedness by financial dependence and control.**

**Question 7. MAS seeks comments on the disaggregation conditions for counterparties in a connected counterparty group and substantial shareholder group, set out in paragraph 4.8. MAS seeks feedback on cases or circumstances where disaggregation of counterparties would be appropriate.**

**Question 8. MAS seeks comments on the proposed aggregation of non-exempt exposures to related corporations as illustrated in Diagram 1.**

**Question 9. MAS seeks comments on the definition of a substantial exposure and the proposal to retain the substantial exposures limit on all exposures except for exposures to banks and other exempt exposures outlined in Section 6.**

**Question 10. MAS seeks comments on the proposed scope of exempt exposures.**

**Question 11. MAS seeks comments on the proposed exposures measurement approach set out in Annex C.**

**Question 12. MAS seeks comments on the proposed treatment of exposures to structures such as investment funds and securitisation vehicles.**

**Question 13. MAS seeks comments on the proposed removal of the limit on banks’ investments in individual index or investment funds.**

**Question 14. MAS seeks comments on the proposed treatment of exposures arising from covered bond holdings.**

**Question 15. MAS seeks comments on the implementation approach for the measurement of exposures arising from derivatives and other instruments that give rise to counterparty credit risk.**

**Question 16. MAS seeks comments on the scope of application.**

**Question 17. MAS seeks comments on the proposed scope of reporting requirements and reporting schedule in Annex D.**

**Question 18. MAS seeks comments on the proposed implementation timeline of 1 January 2019.**