# RESPONSE TO CONSULTATION PAPER

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1. **their whole submission or part of it (but not their identity), or**
2. **their identity along with their whole submission,**

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| **Consultation topic:** | CONSULTATION PAPER ON THE PROPOSED FRAMEWORK FOR VARIABLE CAPITAL COMPANIES PART 2 |
| **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 your whole submission to be kept confidential. Your contact information will not be published.)* |

**General comments:**

**Question 1: MAS seeks comments on the draft Variable Capital Companies (Composition of Offences) Regulations 2019 at Annex B and the draft Variable Capital Companies (Composition of Offences – Part 7) Regulations 2019 in Annex C.**

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

**Question 2: MAS seeks comments on the draft Variable Capital Companies (Fees and Late Lodgment Penalties) Regulations 2019 at Annex D.**

**Question 3:** **MAS seeks comments on the procedure for the registration of a sub-fund.**

**Question 4: MAS seeks comments on the additional confirmations that must be lodged electronically for VCCs.**

**Question 5: MAS seeks comments on the particulars to be provided in a VCC’s annual return and the documents referred to in the regulations.**

**Question 6: MAS seeks comments on the draft Variable Capital Companies (Filing of Documents) Regulations 2019 at Annex E.**

**Question 7: MAS seeks comments on the proposed set of criteria to be used in determining whether a director or proposed director of a VCC would be considered “fit and proper”.**

**Question 8: MAS seeks comments on the draft Variable Capital Companies (Fit and Proper) Regulations 2019 at Annex F.**

**Question 9: MAS seeks comments on the draft Variable Capital Companies (Identical Names) Regulations 2019 at Annex G.**

**Question 10: MAS seeks comments on the draft Variable Capital Companies (Prescribed Accounting Standards) Regulations 2019 at Annex H.**

**Question 11: MAS seeks comments on the prescribed minimum period of contravention of section 46 of the VCC Act of 3 months by a VCC, upon which the Court may order the winding up of a VCC under section 130(8)(n) of the VCC Act.**

**Question 12: MAS seeks comments on the draft Variable Capital Companies Regulations 2019 at Annex I.**

**Question 13: MAS seeks comments on the draft Variable Capital Companies (Revision of Defective Financial Statements, or Consolidated Financial Statements or Balance-sheet) Regulations 2019 at Annex J.**

**Question 14: MAS seeks comments on the draft Variable Capital Companies (Transfer of Registration) Regulations 2019 at Annex K.**

**Question 15: MAS seeks comments on the list of documents to be provided at registration and whether any issues are envisaged for foreign corporate entities to provide these documents.**

**Question 16: MAS seeks comments on the minimum requirements for registration of foreign corporate entities as VCCs under the VCC Act.**

**Question 17: MAS seeks comments on the draft Variable Capital Companies (Striking Off) Regulations 2019 at Annex L.**

**Question 18: MAS seeks comments on the proposed amendments to the SFR(CIS) at Annex M.**

**Question 19: MAS seeks comments on the proposed amendments to the CIS Code at Annex N.**