

MEMO# 13751

July 20, 2001

INSTITUTE LETTER TO SINGAPORE MINISTRY OF FINANCE REGARDING SECURITIES BENEFICIAL OWNERSHIP REPORTING REQUIREMENTS

[13751] July 20, 2001 TO: INTERNATIONAL COMMITTEE No. 45-01 RE: INSTITUTE LETTER TO SINGAPORE MINISTRY OF FINANCE REGARDING SECURITIES BENEFICIAL OWNERSHIP REPORTING REQUIREMENTS On July 20, 2001, the Institute submitted a letter, a copy of which is attached, to the Ministry of Finance in Singapore regarding the Institute's request for relief from the beneficial ownership disclosure requirements under Singapore law for members investing in Singaporean securities. The Singapore Companies Act requires an investor holding voting shares of a listed company to disclose its holdings to that issuing company upon the investor attaining five percent or more interest of the voting shares. After reaching this initial threshold percentage level, the investor must make supplemental disclosures for each change in ownership within two days of the change. Moreover, for purposes of reporting, a parent company must aggregate the holdings of its subsidiaries in determining its interest in a security. In the attached letter, the Institute is requesting that institutional investors be required to make additional disclosures (after reaching the initial threshold level for reporting) only upon reaching a subsequent threshold or upon holdings changing by at least one percent. We also are requesting that institutional investors be provided relief from the aggregation requirement similar to that provided by the SEC under Regulation 13D-G. Finally, we are requesting that the requirement to report ownership in listed companies within two calendar days be amended to provide global investors a reasonable opportunity to submit their reports. Jennifer S. Choi Assistant Counsel Attachment Attachment (in .pdf format)