

# IMAS 15<sup>th</sup> REGULATORY ROUNDTABLE

## Breakout Session Grouping Topics

### **Group 1: MAS Guidelines on EnRM and Information Paper on EnRM**

- Applicability of Requirements
  - The requirements would apply in a way that is commensurate with the asset manager's size, nature of business and materiality of the environmental risk with respect to total assets managed. How do members determine "materiality" and if any thresholds are applied?
- Best Practices
  - Can members share best practices they have adopted and how they are implemented?
    - Promote desired environmental risk management conduct through remuneration framework
    - Monitoring of greenwashing
    - Any others?

### **Group 2: MAS Guidelines on EnRM and Information Paper on EnRM**

- Challenges and Pain Points
  - What are the challenges members faced in addressing the requirements?
    - Talent and knowledge gap within the firm?
    - Embed environmental risk responsibilities in job scopes of second line of defence- practicality?
    - Limitations of data sources?
    - Keeping pace with evolving national and international reporting standards and frameworks?
    - Any others?
- Capacity Building
  - What approaches do members adopt for capacity building and training requirements?
    - E.g. Hiring qualified staff, regular updates to board and senior management, inhouse/external trainings, customised training for specific business lines, general training to all staff, relevant staff to pursue accreditation/certification?

### **Group 3: Disclosure and Reporting Guidelines for Retail ESG Funds**

- Lodgment of Updated Prospectus
  - At the recent MAS engagement session, MAS has clarified that the updated prospectuses of all existing in-scope ESG funds lodged on or after 1st Jan 2023 (the effective date of the MAS circular) will be subject to the requirements in the MAS circular which include among others the enhanced disclosure requirements and the need for the responsible person to indicate in the respective OPERA form 1, 2, 1-A or 2-A that the scheme is an ESG Fund. MAS has also clarified that the circular will not apply to supplementary and replacement prospectus of existing funds lodged on and after 1 Jan 2023.
    - Would this pose any other concerns for your firm?
    - Are there particular questions we need to clarify with the MAS?
    - E.g. Will the OPERA forms be made available prior to 1st Jan 2023 to facilitate lodging funds' updated prospectus expiring in Jan 2023?

### **Group 4: Disclosure and Reporting Guidelines for Retail ESG Funds**

- Disclosure Requirements
  - The MAS Circular provided a list of additional disclosure requirements in Para 14 and clarified that by the date of lodgment of the prospectus, these disclosures should be made on the manager's website or by other appropriate means.
    - Does your firm face any concerns/issues with meeting Para 14 disclosures?
    - What are the issues and which disclosures?
- ESG Fund Naming Convention
  - At the recent MAS engagement session, MAS has clarified that if a fund is deemed as a non-ESG fund under the Circular, MAS considered that it would be inappropriate for the fund name to contain ESG-related terms. MAS further said that it will require the fund to change its name or be represented by another name (without the ESG related terms) when offered to Singapore investors.
    - Does your firm have funds falling in this category? If yes, by changing the fund's name or represented by non-ESG related or similar terms, what are the issues faced by your firm?