

**Summary of Amendments to the
Guidelines on Compliance Function for Fund Management Companies (Compliance Guidelines)
(Revised: 5 January 2018)**

The following table provides a summary of amendments made to the *Guidelines on Compliance Function for Fund Management Companies* revised on 5 January 2018:

| A. Specific amendments | | | |
|-------------------------------|---|---|---|
| No | Reference in the Compliance Guidelines | | Comments |
| | Prior to 5 January 2018 | Revised version dated 5 January 2018 | |
| 1. | Para. 2.01 - | Para. 2.01 cross trade IMA | Inclusion of the definition of 'cross trade' and 'IMA'. |
| 2. | Para. 4.04 (o) | Para. 4.04 (p) | Renumbering of existing paragraph and redrafting on submissions to be made to the SC where reference to specific reports to be made has been moved under the common reporting platform. |
| 3. | Para. 4.04 (p) | Para. 4.04 (o) | Renumbering of existing paragraph. |
| 4. | Para. 11.14 (a) – (c) | Para. 11.14 (a) and (b) | Redrafting to provide clarity on utilisation of soft commission. |
| 5. | Para. 11.27 | Para. 11.27 | Redrafting to provide clarity on the expectations relating to the policies and procedures. |
| 6. | Para. 11.28 (a) – (e) | Para. 11.28 (a) – (d) | Redrafting to provide clarity on the consent/disclosure to be made and renumbering of sub-paragraphs (b) and (c) in order of execution. |
| 7. | - | Para. 11.30 | Inclusion of requirement for compliance officer to verify cross trades undertaken. |