Nikko AM

This Fund Summary is for the following ILP Sub-Funds and should be read in conjunction with the Product Summary

Nikko AM Global Green Bond RP/SP
Nikko AM Shenton Asia Pacific RP/SP
Nikko AM Shenton Income RP/SP
Nikko AM Shenton Short Term Bond RP/SP

Structure of ILP Sub-Fund

The above ILP sub-funds are feeder funds investing in the underlying Nikko AM Global Green Bond Fund, Nikko AM Shenton Asia Pacific Fund, Nikko AM Shenton Income Fund, which are open-ended stand-alone unit trust established under the laws of Singapore and is denominated in Singapore Dollars.

Lastly, Nikko AM Shenton Short Term Bond is ILP sub-fund which is a feeder fund investing in the underlying Nikko AM Shenton Short Term Bond Fund (S$), a Singapore Dollar denominated open-ended unit trust and a sub-fund of Nikko AM Shenton Short Term Bond Funds umbrella, established under the laws of Singapore. Nikko AM Shenton Short Term Bond is included under the CPF Investment Scheme but is closed to new subscription and it is classified as Broadly Diversified with Low to Medium risk.

The units in the ILP Sub-Funds are not classified as Excluded Investment Products except for Nikko AM Shenton Short Term Bond Fund (S$).

Information on the Managers

<u>Investment Manager of the underlying funds</u>

The Managers of the Schemes are Nikko Asset Management Asia Limited. The Managers are domiciled in the Republic of Singapore and are licensed and regulated by the Authority. The Managers have managed collective investment schemes or discretionary funds in Singapore since 1982.

Other Parties

The Trustee for the Schemes is BNP Paribas Trust Services Singapore Limited (Company Registration No: 200800851W) and its registered address is 20 Collyer Quay, #01-01, Singapore 049319. The Trustee is approved and regulated by the Authority.

Investment Objectives, Focus & Approach

The investment objectives and policies of the underlying Nikko AM sub-funds are described in the "Investment Objectives and Policies" section in the Nikko AM Prospectus.

The Registrar for the Schemes is BNP Paribas Trust Services Singapore Limited. Holders of each Scheme may inspect the Register for the relevant Scheme at 20 Collyer Quay, #01-01, Singapore 049319 during usual business hours subject to such reasonable closure of the Register and such restrictions as the Managers or Trustee may impose. The Register is conclusive evidence of the number of Units held by each Holder.

The custodian for the Schemes is BNP Paribas Securities Services, operating through its Singapore branch (Company Registration No.: T08FC7287D) (the "Custodian") and its registered address is at 20 Collyer Quay, #01-01, Singapore 049319. The Custodian is licensed and regulated by the Authority.

Risks

In addition to the risks stated in the Product Summary, please refer to "Specific risks particular to certain Schemes are set out below" section in the Nikko AM Prospectus for a description of the risk factors associated with investing in the Underlying Funds. The risks may include:

General Risks

Investment in a collective investment scheme is meant to produce returns over the long term and is not suitable for short term speculation. The prices of units in a collective investment scheme, and the income from them, may go up as well as down, and past performance of the collective investment scheme is not necessarily a guide to the future performance of the collective investment scheme. A possible loss of the principal invested cannot be ruled out. While the Managers believe that the Schemes offer potential for capital appreciation, no assurance can be given that this objective will be achieved. You should read this Prospectus and discuss all the risks with your financial and legal advisors before making an investment decision. The risks of investments made by a collective investment scheme include economic, political, foreign exchange, liquidity, regulatory, interest rate, defaults and repatriation risks.

Risks specific to the Schemes

(a) Market risk in the region in which the Scheme invests

The price of the securities comprised in the portfolio of a Scheme and the Units, and the income from them, may be influenced by political and economic conditions, changes in interest rates, the earnings of the corporations whose securities are comprised in the portfolio, and the market's perception of the securities.

(b) Liquidity risk

The extent of market liquidity is dependent on the size and state of the markets and therefore affects a Scheme's ability to acquire or dispose of assets at the price and time it so desires. Securities listed on the smaller emerging markets are generally less liquid in comparison to those listed on more developed markets and may therefore affect a Scheme's ability to acquire or dispose of securities at the price and time desired. There may also be state regulations governing the outward remittance by foreign investors of their share of net profits and dividends and the repatriation of their investments in a foreign currency.

In addition, the Schemes are not listed on any stock exchange and there is no ready secondary market for the Units. Holders can only redeem their Units by completing a realisation request and forwarding the same to the Managers through their approved distributors. If there is a surge in realisations at any particular time, the Managers may impose a gate on realisations. If that happens, realisation of Units and/or the payment of realisation proceeds may be delayed. In addition, holders may not realise their Units during any period when realisation is suspended.

(c) Currency risk

As investments of a Scheme may be denominated in foreign currencies other than the base currency of the Scheme or the Class Currency of the relevant Class within the Scheme, fluctuations in the exchange rates of these foreign currencies may have an impact on the value of the Units of the relevant Scheme.

A Scheme may also invest in securities that are denominated in a wide range of currencies, some of which may not be freely convertible. The net asset value of a Scheme as expressed in its base currency or the net asset value of a Class as expressed in its Class Currency will fluctuate in accordance with the changes in the foreign exchange rates between the base currency of such Scheme or the Class Currency of such Class (as the case may be) and the currency in which the relevant Scheme's investments are denominated. The relevant Scheme may therefore be exposed to foreign exchange/currency risks.

The Managers reserve the discretion to hedge, whether fully, partially or not at all, the foreign currency exposure of a Scheme, and if partial or no hedging is made, the value of the Units may be affected. If currency exposure is hedged, a passive hedging policy is usually adopted.

In respect of the foreign currency exchange rate movements, it may affect the returns to investors in Singapore, and investors in Singapore may be exposed to exchange rate risks.

(d) Currency hedged Class risk

If the Class Currency of a Class within a Scheme is different from the base currency of the Scheme, fluctuations in exchange rates may affect the NAV of the Class irrespective of performance and therefore substantially impact the performance of such Class expressed in its Class Currency. For Schemes that offer currency hedged Classes (each referred to in this sub-paragraph as a "Hedged Class" and collectively the "Hedged Classes"), the Managers may seek to reduce such exchange rate fluctuations by engaging in currency hedging transactions between the Class Currency of the relevant Hedged Class and the base currency of the relevant Scheme. However, there is no assurance that the hedging objective can be achieved. In the case of a net flow to or from such Hedged Classes, the hedging may not be adjusted and reflected in the NAV of the relevant Hedged Class until the following or a subsequent Business Day following the valuation day on which the instruction was accepted. To the extent these hedging transactions are imperfect or only placed over a portion of the foreign exchange exposure, the resulting gains/losses will be reflected in the NAV of such Hedged Classes. The cost of using FDIs such as currency forwards to implement these hedging strategies with respect to the Hedged Classes may also be reflected in the NAV of such Hedged Classes. You should note that in extreme cases, there is a risk that currency hedging transactions that are attributed to specific Hedged Classes may adversely affect the NAV of other Classes within the relevant Scheme due to a lack of segregated liabilities between Classes of the Scheme.

(e) Interest rate and credit risk

Investments in debt securities are subject to interest rate fluctuations and credit risks, such as risk of default by the issuer, and are subject to adverse changes in general economic conditions, the financial condition of the issuer, or both, or an unanticipated rise in interest rates, which may impair the issuer's ability to make payments of interest and principal, resulting in a possible default by the issuer. Where a Scheme, based on its investment objective and/or investment strategy, is permitted to invest in debt securities that are non-investment grade, such Scheme will be subject to increased credit risk.

(f) Equity risk

A Scheme may invest in stocks and other equity securities, which are subject to market risks and are in general more volatile than investment-grade fixed income securities. Units may therefore be subject to greater price volatility.

(g) Emerging markets risk

Certain Schemes may invest in emerging markets securities which are in general more volatile than those of developed countries, with the result that Units may be subject to greater price volatility.

Some emerging markets do not have well-developed or consolidated bodies of securities laws and regulatory frameworks. There may be less public information on companies listed on such markets as compared to other stock markets. The auditing and financial reporting methods used in some emerging markets may differ from internationally recognised standards, and information on the accounts of some companies listed on such markets may not be an accurate reflection of their financial strength.

You would also have to take into account that trading volume in emerging markets may be substantially less than in the world's leading stock markets and may have to be conducted at unfavourable prices. Securities of companies domiciled in emerging markets are less liquid and more volatile than those domiciled in more developed stock markets and this may result in fluctuations in the price of the Units. Emerging markets may not have fully developed custodian and settlement services and therefore investments in such markets are subject to a greater degree of risk.

There may also be state regulations governing the outward remittance by foreign investors of their share of net profits and dividends and the repatriation of their investments in a foreign currency.

(h) Foreign securities risks

The investments of certain Schemes may be affected by political instability as well as exchange controls, changes in taxation, foreign investment policies and other restrictions and controls which may be imposed by the relevant authorities in the other countries.

The legal infrastructure and accounting, auditing, and reporting standards in certain countries in which an investment may be made may not provide the same degree of investor protection or information to investors as would generally apply in major securities markets. Foreign ownership restrictions in some markets may mean that corporate action entitlements in relation to any collective investment schemes or other investments the relevant Scheme is invested in, may not always be secured or may be restricted.

(i) Country specific risk

Certain Schemes may invest in securities of a limited number of countries. Where the Scheme invests in a few, select countries, it will be exposed to fluctuations in the economies of these countries, and the market, currency, political, social environment, and other risks related specifically to these countries, which may affect the market price of its investments in these countries. Exposure to a limited number of countries also increases the potential volatility of the relevant Scheme due to the increased concentration risk as they are less diversified compared to exposure to specific regional or global markets.

(j) Sector risk

Certain Schemes may invest in specific industry sectors, which may result in greater than usual risks and prices may also be subject to above-average volatility. You should be aware that there can be no assurance that the relevant Scheme's investments will be successful or that the investment objectives of the relevant Scheme will be attained.

(k) Smaller companies risk

Certain Schemes may invest in smaller companies. Although smaller companies present more potential for growth, investing in smaller companies may involve greater risks in comparison to investing in larger and more established companies. Securities in smaller companies may be less liquid and more volatile than the securities of larger companies due to inadequate trading volume or restrictions on trading, resulting in fluctuations in the price of the Units.

(l) Income distribution

You should note that income of certain Schemes (if any) may be distributed to Holders at the absolute discretion of the Managers. Sources of income for distribution include dividend and/or interest income and/or capital gains derived from the investments of the relevant Scheme. Such dividend and/or interest income may be adversely affected by events such as but are not limited to companies suffering unexpected losses, having lower than expected dividends and adverse exchange rate fluctuations. In addition to distributions to Holders out of distributable income and/or capital gains, the Managers may make capital distributions to Holders at such time as they deem fit where permitted and in accordance with the provisions of the relevant Deed. Where distributions are paid out of the capital of the relevant Scheme or Class, the capital and the NAV of the relevant Scheme or Class will be reduced and this will be reflected in the Realisation Price of the Units of the relevant Scheme or Class. Holders redeeming their Units of the relevant Scheme or Class may therefore receive an amount less than their initial investment. Such distributions may also result in reduced future returns to Holders of the relevant Scheme or Class.

(m) Risks of investing in Underlying Fund(s)

In respect of a Scheme which invests partially or wholly in an Underlying Fund, the performance of such Scheme will be subject to the performance of the relevant Underlying Fund(s) which it invests in and also to the proportion of its assets allocated to the relevant Underlying Fund(s). Holders should be aware that the Managers have limited discretion to vary a Scheme's allocation(s) to its Underlying Fund(s) which will in turn limit the Managers' ability to react to changes in market conditions.

(n) Sustainability risk

Certain Schemes may invest in Underlying Fund(s) which are exposed to sustainability risk. Sustainability risk is the risk arising from any environmental, social or governance events or conditions that, were they to occur, could cause material negative impact on the value of the relevant Underlying Fund's investments. Specific sustainability risk can vary for each product and asset class, and include but are not limited to:

(i) Transition risk

The risk posed by the exposure to issuers that may potentially be negatively affected by the transition to a low carbon economy due to their involvement in exploration, production, processing, trading and sale of fossil fuels, or their dependency upon carbon intensive materials, processes, products, and services. Transition risk may result to several factors, including rising costs and/or limitation of greenhouse gas emissions, energy-efficiency requirements, reduction in fossil fuel demand or shift to alternative energy sources, due to policy, regulatory, technological and market demand changes. Transition risk may negatively affect the value of the relevant Underlying Fund's investments by impairing assets or by increasing liabilities, capital expenditures, operating and financing costs.

(ii) Physical risk

The risk posed by the exposure to issuers that may potentially be negatively affected by the physical impacts of climate change. Physical risk includes acute risks arising from extreme weather events such as storms, floods, droughts, fires or heatwaves, and chronic risks arising from gradual changes in the climate, such as changing rainfall patterns, rising sea levels, ocean acidification, and biodiversity loss. Physical risk may negatively affect the value of the relevant Underlying Fund's investments by impairing assets, productivity, revenues or by increasing liabilities, capital expenditures, operating and financing costs.

(iii) Social risk

The risk posed by the exposure to issuers that may potentially be negatively affected by social factors such as poor labour standards, human rights violations, damage to public health, data privacy breaches, or increased inequalities. Social risk may negatively affect the value of the relevant Underlying Fund's investments by impairing assets, productivity, revenues or by increasing liabilities, capital expenditures, operating and financing costs.

(iv) Governance risk

The risk posed by the exposure to issuers that may potentially be negatively affected by weak governance structures. For companies, governance risk may result from malfunctioning boards, inadequate remuneration structures, abuses of minority shareholders or bondholders rights, deficient controls, aggressive tax planning and accounting practices, or lack of business ethics. For countries, governance risk may include governmental instability, bribery and corruption, privacy breaches and lack of judicial independence. Governance risk may negatively affect the value of the relevant Underlying Fund's investments due to poor strategic decisions, conflict of interest, reputational damages, increased liabilities or loss of investor confidence.

Financial derivatives risk

(i) In respect of each Scheme, the Managers may in their absolute discretion, invest in FDIs, including, but not limited to, options on securities, forward contracts, over-the counter options, interest rate swaps and swaptions, credit default swaps and swaptions, index futures and options, futures or options of any kind of financial instrument or structured notes such as credit-linked notes, equity-linked notes and index-linked notes for the purposes of (in the case of each Scheme except for the Nikko AM Shenton Short Term Bond Funds – Nikko AM Shenton Short Term Bond Fund (S$)) optimising returns, hedging and/or efficient portfolio management and (in the case of the Nikko AM Shenton Short Term Bond Funds – Nikko AM Shenton Short Term Bond Fund (S$)) hedging and efficient portfolio management. As at the date of registration of this Prospectus, in respect of each Scheme the Managers only use FDIs for purposes of hedging and/or efficient portfolio management. As at the date of registration of this Prospectus, the Managers currently do not use or intend to use FDIs. The Managers may make use of FDIs as allowed in the Code.

(ii) Where FDIs are used, the global exposure of a Scheme to FDIs or embedded financial derivatives instruments should not exceed 100% of the NAV of the relevant Scheme at all times. The Schemes will use the commitment approach, as described in and calculated in accordance with the provisions of the Code, to determine their exposure to FDIs. Where a Scheme invests in financial derivatives on commodities, such transactions shall be settled in cash at all times.

(iii) The Managers employ a risk management process in the investment of FDIs. The risks related to each FDI the Managers invest in are duly measured, monitored and managed on an ongoing basis. All open positions/exposure in FDIs will be marked to market at a frequency at least equal to the frequency of the calculation of the net asset value of a Scheme. The Managers have a dedicated team which is responsible for oversight of, amongst other things, the monitoring of the Schemes for compliance with the relevant investment guidelines. This team will be responsible for setting up and maintaining the checks on the investment guidelines and restrictions on both the automated and manual compliance systems, which cover pre-trade and on-going review of the Schemes. The Managers also have an established procedure to report breaches of the investment guidelines, if any.

(iv) The Managers will ensure that the risk management and compliance procedures are adequate and have been or will be implemented and that they have the necessary expertise to control and manage the risks relating to the use of financial derivatives.

(v) Risks associated with the use of FDIs

While the prudent and judicious use of derivatives by investment professionals can be beneficial, derivatives involve risks different from, and in some cases, greater than, the risks presented by more traditional investments. Some of the risks associated with derivatives are market risk, management risk, credit risk, liquidity risk, moratorium risk, capital control risk, tax risk and leverage risk. The Managers have the necessary expertise and controls for investments in derivatives and have in place systems to monitor the derivative positions for the Schemes, if any. The viability of exercising derivative instruments depends on the market price of the investments to which they relate, and accordingly, the Managers may from time to time decide that it is not viable to exercise certain derivatives held by a Scheme within the prescribed period, in which case, any costs incurred in obtaining the derivatives will not be recoverable. Additionally, the market price of the relevant investment may not exceed the exercise price attached to the derivative instrument at any time during the exercise period or at the time at which the warrants or options are exercised and if this happens, there may be an immediate loss to the relevant Scheme. The Schemes may invest into underlying funds which use or invest in FDIs, and it is possible that the relevant Scheme's NAV may be subject to volatility due to the relevant Scheme's or the relevant underlying fund's usage or investment in FDIs.

The above should not be considered as an exhaustive list of the risks which potential policyholders should consider before investing in the Nikko AM Funds. Potential policyholders should be aware that an investment in Nikko AM Funds may be exposed to other risks of an exceptional nature from time to time.

Fees and Charges

In addition to the fees and charges shown in the Product Summary and Factsheet, the following fees are payable through deduction from the asset value of the ILP sub-fund:

Fees Payable by the Underlying Funds, which the ILP sub-fund invests into	
Underlying Funds Name	**Annual Trustee's Fee***
Nikko AM Global Green Bond Fund	Current: Up to 0.125% p.a. Always subject to minimum of S$20,000 p.a.
Nikko AM Shenton Asia Pacific Fund	Current: Up to 0.1% p.a. (The Annual Trustee's Fee is payable out of the Management Fee and is therefore borne by the Managers)
Nikko AM Shenton Income Fund	Current: Up to 0.075% p.a. (The Annual Trustee's Fee is payable out of the Management Fee and is therefore borne by the Managers)
Nikko AM Shenton Short Term Bond Fund (S$)	Current: Up to 0.1% p.a.

*The Trustee of the above underlying Nikko AM Fund is BNP Paribas Trust Services Singapore Limited.

Past Performance and Benchmark of the Underlying Fund: as at 30 June 2021

NOTE: PAST PERFORMANCE IS NOT NECESSARILY INDICATIVE OF FUTURE PERFORMANCE.

Fund / Benchmark**	3 Months	6 Months	1 Year	3 Year*	5 Year*	10 Year*	Since Inception* (30 Nov 2002)
Nikko AM Global Green Bond (RP)	0.73%	-3.98%	-0.72%	-1.12%	-2.60%	-2.91%	-3.12%
Nikko AM Global Green Bond (SP)	0.83%	-3.80%	-0.33%	-0.65%	-2.13%	-2.44%	-2.64%

**With effect from 1 April 2017, the existing benchmark for the Underlying Fund has been removed because the Manager is of the view that it is not representative of the Fund's strategy. The performance of the Underlying Fund will therefore not be measured against any benchmark on and after 1 April 2017.

Fund / Benchmark**	3 Months	6 Months	1 Year	3 Year*	5 Year*	10 Year*	Since Inception* (5 Jan 2006)
Nikko AM Shenton Asia Pacific (RP)	3.22%	4.16%	32.78%	13.16%	13.04%	5.27%	3.10%
Nikko AM Shenton Asia Pacific (SP)	3.34%	4.40%	33.33%	13.71%	13.64%	5.82%	3.61%
Benchmark: MSCI AC Asia Pacific ex Japan Index (Net Total Return)	4.06%	8.66%	34.25%	11.34%	13.87%	7.65%	6.25%

Fund / Benchmark**	3 Months	6 Months	1 Year	3 Year*	5 Year*	10 Year*	Since Inception* (18 Jul 2003)
Nikko AM Shenton Income (RP)	0.64%	-0.08%	2.71%	3.12%	1.40%	2.01%	1.25%
Nikko AM Shenton Income (SP)	0.81%	0.22%	3.32%	3.66%	1.93%	2.54%	1.76%

**With effect from 2 January 2013, there is no benchmark for the Underlying Fund as it is managed on an absolute return basis.

Fund / Benchmark**	3 Months	6 Months	1 Year	3 Year*	5 Year*	10 Year*	Since Inception* (5 Jan 2006)
Nikko AM Shenton Short Term Bond (RP)	-0.29%	-0.38%	0.67%	0.48%	-0.06%	0.12%	0.30%
Nikko AM Shenton Short Term Bond (SP)	-0.18%	-0.18%	1.07%	0.96%	0.45%	0.62%	0.80%
Benchmark: 3-months SIBOR	0.11%	0.21%	0.43%	1.26%	1.20%	0.88%	1.11%

*Annualised Performance

Total Expense Ratio and Turnover Ratio

Fund	**Expense Ratio^**	**Turnover Ratio^**
Nikko AM Global Green Bond (RP)	3.50%	1.45%
Nikko AM Global Green Bond (SP)	2.99%	1.45%
Nikko AM Shenton Asia Pacific (RP)	2.71%	84.24%
Nikko AM Shenton Asia Pacific (SP)	2.71%	84.24%
Nikko AM Shenton Income (RP)	2.61%	65.75%
Nikko AM Shenton Income (SP)	2.09%	65.75%
Nikko AM Shenton Short Term Bond (RP)	2.58%	25.94%
Nikko AM Shenton Short Term Bond (SP)	2.08%	25.94%

^ The expense ratios stated in the table above are for the period ended 30 June 2021.
^ The turnover ratios stated in the table above are for the period ended 31 December 2020 except for Nikko AM Shenton Short Term Bond (RP) and Nikko AM Shenton Short Term Bond (SP) which are for the period ended 30 June 2021.

Soft Dollar Commissions or Arrangements

In their management of the respective Schemes and Underlying Funds, the Managers currently do not receive or enter into any soft dollar commissions or arrangements.

Conflicts of Interest

The Managers are part of a financial group, and the Managers and their affiliates provide the full suite of financial services to clients, and act simultaneously for a number and range of clients with various interests, requirements and positions.

Other than the Schemes comprised in this Prospectus, the Managers are also the managers of other collective investment schemes including but not limited to:
(a) Nikko AM Shenton Horizon Investment Funds
(b) Nikko AM Shenton Eight Portfolios
(c) ABF Singapore Bond Index Fund
(d) The Solidarity Fund
(e) Nikko AM Singapore STI ETF
(f) Nikko AM Japan Dividend Equity Fund
(g) Nikko AM Asia High Yield Bond Fund
(h) MSIG Asian Bond Fund
(i) Nikko AM Global Multi Asset Conservative Fund
(j) Nikko AM Asia Healthcare Fund
(k) Nikko AM China Onshore Fund Series
(l) Nikko AM All China Equity Fund
(m) Nikko AM ASEAN Equity Fund
(n) NikkoAM-StraitsTrading Asia ex Japan REIT ETF
(o) Nikko AM Asia Limited Investment Fund Series

(p) Nikko AM SGD Investment Grade Corporate Bond ETF
(q) NikkoAM-ICBCSG China Bond ETF

The Managers may from time to time have to deal with competing or conflicting interests arising from such other funds managed by the Managers. For example, the Managers may make a purchase or sale decision on behalf of some or all of the other funds managed by the Managers without making the same decision on behalf of all or any of the Schemes, as a decision whether or not to make the same investment or sale for any Scheme depends on factors such as the cash availability and portfolio balance of that Scheme. However, the Managers will use their reasonable endeavours at all times to act fairly and in the interests of the relevant Scheme. In particular, after taking into account the availability of cash and the relevant investment guidelines of the other funds managed by the Managers and the relevant Scheme, the Managers will endeavour to ensure that securities bought and sold will be allocated proportionately as far as possible among the other funds managed by the Managers and the relevant Scheme. The Managers may also transact on each Scheme’s behalf with their affiliates. The Managers intend to deal with any conflicts of interests in a manner consistent with any applicable guidelines which may be issued from time to time by the Investment Management Association of Singapore.

The Managers are of the view that they are not in a position of conflict in managing their other funds as these funds and the Schemes have different investment universes and investment restrictions. To the extent that there are overlapping investment objectives, the Managers will, as far as practicable, endeavour to have the same securities holdings for such overlapping areas with such securities allocated on a pro-rata basis among the relevant funds. The Managers will conduct all transactions with or for the Schemes at arm’s length. Subject to the relevant investment guidelines of the Schemes, the Schemes may also invest in other funds managed by the Managers and/or its affiliates.

In respect of voting rights where the Managers may face a conflict between its own interest and that of the Holders of the relevant Scheme, the Managers shall cause such voting rights to be exercised in consultation with the Trustee.

The Managers or their affiliates (together the “Parties”) are or may be involved in other financial, investment and professional activities (including but not limited to providing discretionary investment management or investment advisory services to other clients) which may on occasion cause conflicts of interest with the management of a Scheme. Notwithstanding paragraph 19.2 above, the Parties will be free, in their absolute discretion, to make recommendations to others, or effect transactions on behalf of themselves or for others which may be the same as or different from those effected for the Scheme, and to do so prior to, at the same time as, or after effecting such transactions. The Parties shall not be obliged to purchase, retain or sell for the Scheme any security which the Parties may purchase, retain or sell on behalf of themselves or for others, or which the Parties may recommend to others to purchase, retain or sell. Furthermore, the Parties shall be free to purchase, sell, deal in or compete for the same financial instruments as the Scheme or to take positions opposite to the positions of the Scheme, on behalf of themselves or for others, or to recommend others to take positions opposite to the position of the Scheme. Each of the Parties will ensure that the performance of their respective duties will not be impaired by any such involvement. If a conflict of interest does arise, the Parties will endeavour to ensure that it is resolved fairly and in the interest of the Holders.

Associates of the Trustee (the “Trustee’s Associates”) may be engaged to provide financial, banking and brokerage services to the Schemes. Such services where provided, will be on an arm's length basis and the Trustee’s Associates shall not be liable to account to any person for any profits or benefits made or derived by them in connection with any such services. If there is a conflict of interest, the Trustee will endeavour to resolve such conflict quickly and in the interest of the Holders in an equitable manner.

The Managers or the Trustee may acquire, own, hold, dispose or otherwise deal with Units as though they were not a party to the relevant Deed. If any conflict of interest arises as a result of such dealing, the Managers and the Trustee, following consultation with the other, will resolve such conflict in a just and equitable manner as they shall deem fit. Such dealings, where entered into will be on an arm’s length basis.

The Trustee is presently also offering registrar services to the Schemes while the Custodian (which is a party related to the Trustee) is presently also providing fund administration and valuation services to the Schemes. These services are provided on an arm’s length basis and the fees for these services are permitted to be paid out of the relevant Deposited Property of the relevant Scheme under the provisions of the relevant Deed. Each Deed also provides that the Trustee and the Managers shall conduct all transactions with or for the relevant Scheme on an arm’s length basis. The Managers may also transact on the relevant Scheme’s behalf with its affiliates.

Reports

The financial year-end of the ILP Sub-Fund is 30 June. Singapore Life Ltd. will make available semi-annual report and annual audited report of the ILP Sub-Fund within 2 months and 3 months respectively from the relevant reporting periods.

In addition, Singapore Life Ltd. will make available financial reports of the Underlying Fund as they become available from the Investment Manager. Policyholders can access these reports via the website at www.singlife.com.

Specialised ILP Sub-Fund

The ILP Sub-Fund is not a specialised Sub-Fund as set out in MAS Notice 307 on Investment-Linked Policies issued by the Monetary Authority of Singapore.