

# SCHEME INFORMATION DOCUMENT

# **SECTION I**

# MAHINDRA MANULIFE DYNAMIC BOND FUND

(An open ended dynamic debt scheme investing across duration. A relatively high interest rate risk and moderate credit risk.)

This product is suitable for investors who are seeking*	Scheme Riskometer <sup>#</sup>	Benchmark Riskometer <sup>#</sup> :	
<ul> <li>To generate regular returns and capital appreciation through active management of portfolio;</li> <li>Investment in debt and money market instruments across duration</li> </ul>	Moderate Risk Moderately High Risk Low to Moderate Risk Low Risk RISKOMETER The risk of the scheme is Moderate	As per AMFI Tier 1 Benchmark i.e CRISIL Dynamic Bond A-III Index	

\* Investors should consult their financial advisers if in doubt about whether the product is suitable for them.

<sup>#</sup> The Risk-o-Meter specified above is based on the Scheme portfolio/Benchmark data, as on April 30, 2025. For latest riskometer(s), investors are requested to refer periodical portfolio disclosure(s) available on the website of the Fund viz. <u>www.mahindramanulife.com</u>

Potential Risk Class Matrix			
Credit Risk $\rightarrow$	<b>Relatively Low (Class A)</b>	Moderate (Class B)	Relatively High (Class C)
Interest Rate Risk↓			
<b>Relatively Low (Class I)</b>			
Moderate (Class II)			
<b>Relatively High (Class III)</b>		B-III	

Name of Mutual Fund	Mahindra Manulife Mutual Fund	
Name of Asset Management Company	Mahindra Manulife Investment Management Private Limited	
Name of Trustee Company	Mahindra Manulife Trustee Private Limited	
Addresses, Website of the Entities	Registered Office: 4th Floor, A-wing, Mahindra Towers, Dr. G M	
	Bhosale Marg, P K Kurne chowk, Mumbai – 400018	
	<b>Corporate Office</b> : Unit No. 204, 2 <sup>nd</sup> Floor, Amiti Building, Piramal	
	Agastya Corporate Park, LBS Road, Kamani Junction, Kurla (West)	
	Mumbai - 400070.	
	Website: www.mahindramanulife.com	

#### Continuous offer for Units at NAV based prices:

The particulars of the Scheme have been prepared in accordance with the Securities and Exchange Board of India (Mutual Funds) Regulations 1996, (herein after referred to as SEBI (MF) Regulations or the Regulations) as amended till date, and circulars issued thereunder filed with SEBI, along with a Due Diligence Certificate from the Asset Management Company (AMC). The units being offered for public subscription have not been approved or recommended by SEBI nor has SEBI certified the accuracy or adequacy of the Scheme Information Document

The Scheme Information Document sets forth concisely the information about the scheme that a prospective investor ought to know before investing. Before investing, investors should also ascertain about any further changes to this Scheme Information Document after the date of this Document from the Mutual Fund / Investor Service Centres / Website / Distributors or Brokers.

The investors / unitholders are advised to refer to the Statement of Additional Information (SAI) for details of Mahindra Manulife Mutual Fund, Standard Risk Factors, Special Considerations, Tax and Legal issues and general information on <a href="https://www.mahindramanulife.com">www.mahindramanulife.com</a>

SAI is incorporated by reference (is legally a part of the Scheme Information Document). For a free copy of the current SAI, please contact your nearest Investor Service Centre or log on to our website. The Scheme Information Document (Section I and II) should be read in conjunction with the SAI and not in isolation.

This Scheme Information Document is dated May 26, 2025.

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## PART I HIGHLIGHTS / SUMMARY OF THE SCHEME

Sr.	Title	Description		
No. I.	Name of the scheme	Mahindra Manulife Dynamic Bond Fund		
I. II.	Category of the Scheme	Dynamic Bond		
III.	Scheme type	An open ended dynamic debt s relatively high interest rate risk and	cheme investing across duration. A	
IV.	Scheme Code	MAHM/O/D /DBF/18/05/0007	i moderate credit fisk.	
V.	Investment Objective	The investment objective of the Scheme is to generate regular returns and capital appreciation through an active management of a portfolio constituted of money market and debt instruments across duration. However, there is no assurance that the investment objective of the Scheme will be realized and the Scheme does not assure or guarantee any returns.		
VI.	Liquidity	prices on all Business Days on an o	ription and Redemption at NAV based ongoing basis. The AMC shall dispatch working days from date of receipt of older/ investor.	
VII.	Benchmark (Total Return Index)	CRISIL Dynamic Bond A-III Index (First Tier Benchmark). Justification for use of benchmark		
		The composition of the CRISIL Dynamic Bond A-III Index is such that it is most suited in line with the investment strategy and portfolio construct of the Scheme for comparing performance of the Scheme. The constituents and weights of CRISIL Dynamic Bond A-III Index are as under:		
		ConstituentsApplicable Weight as on January 2025		
		AAA 3 to 5 Years Bonds	2023	
		AAA 5 Years & Above Bonds	28%	
		CRISIL Dynamic Gilt Index	50%	
		Total	100%	
		1000	10070	
VIII.	NAV Disclosure	The AMC will calculate and disclose the NAVs on all the Business Days. The AMC shall update the NAVs on its website (www.mahindramanulife.com) and of the Association of Mutual Funds in India - AMFI (www.amfiindia.com) before 11.00 p.m. on every Business Day. Further, in case NAV of Corporate Debt Market Development Fund ("CDMDF") units is not available by 9:30 p.m. of same Business Day, NAV declaration timing shall be 10 a.m. on next Business Day instead of 11 p.m. on same Business Day.		
IX.	Applicable timelines	<ul> <li>For further details on NAV Disclosure, kindly refer Section II of the SID.</li> <li>Dispatch of Redemption proceeds: The redemption proceeds shall be dispatched to the unitholders within 3 working days from the date of receipt of redemption application, complete / in good order in all respects. However, pursuant to Clause 14.1.3 of SEBI Master Circular,</li> </ul>		

X.	Plans and Options         Plan/Options       and	<ul> <li>AMFI vide its communication no. AMFI/35P/MEM-COR/74/2022-23 dated January 16, 2023, has provided certain exceptional circumstances wherein the additional timelines shall be applicable (please refer Statement of Additional Information "SAI" for further details.)</li> <li>Dispatch of Income Distribution cum Capital Withdrawal (IDCW) proceeds: The payment of IDCW proceeds shall be made within 7 working days from the record date.</li> <li>The Scheme offers two plans viz. Regular Plan and Direct Plan with a common portfolio and separate NAVs.</li> </ul>			
	options under the	PLAN	PLAN OPTIONS DEFAULT OPTION		
	Scheme		AVAILABLE		
		Regular Plan Direct Plan	<ol> <li>Growth Option</li> <li>Income Distribution cum Capital Withdrawal Option / IDCW Option.</li> <li>Growth Option</li> <li>Income Distribution cum Capital Withdrawal Option / IDCW Option.</li> </ol>	Sub-Opti Discretio 3. Default b & Reinve under ID Reinvestu Income cum Withdraw Reinvestu Under IDCV 'Payout' faci by the inv indicating th the applicat processed Discretionary of Income Di	val/IDCW on – nary etween Payout estment facility CW Option – ment of Distribution Capital val/ IDCW ment Facility W Option, if lity is selected estor without e Sub-Option, ion will be under the
		Sub-Ont	ion / Facilities	Frequency	Record
		Discretio Distributi (IDCW Reinvesti cum Ca	nary (Payout of Income ion cum Capital Withdrawal Payout facility) and ment of Income Distribution pital Withdrawal (IDCW) ment facility)	NA	Date* NA

		Quarterly(Payout of Income Distribution cum Capital Withdrawal (IDCW Payout Facility) and Reinvestment of Income Distribution cum Capital Withdrawal (IDCW Reinvestment facility).QuarterlyThird Friday of March, June, September and December*** Immediately preceding business day if the record date happens to be non-business day.Image: Comparison of the second date happens to be non-business day.		
		** Or such other date as decided by the Trustees. Further, the Trustees/AMC reserves the right to change the record date from time to time.		
XI.	Load Structure	For detailed disclosure on default plans and options, kindly refer SAI. Exit Load – Nil		
лі.	Loau Structure	Exit Loau – Mi		
		For more details on Load Structure, refer to the paragraph 'Load		
XII.	Minimum Application	Structure' in Part III of Section I <ul> <li>During NFO: Not Applicable</li> </ul>		
<b>A</b> 11.	Amount/Switch in	• During NFO. Not Applicable		
		On Continuous basis:		
		Minimum Application Amount: Rs. 1,000 and in multiples of Re. 1/-		
		thereafter		
		Minimum Amount for Switch in: Rs. 1,000/- and in multiples of Re.		
		0.01/- thereafter.		
		Note: The requirements w.r.t minimum application amount will not be		
		applicable for investment(s) made in the Scheme, pursuant to Clause 6.10 of the SEBI Master Circular on 'Alignment of interest of Designated		
		Employees of Asset Management Companies (AMCs) with the		
		Unitholders of the Mutual Fund Schemes'		
XIII.	Minimum Additional Purchase Amount	Rs. 1,000 and in multiples of Re. 1/- thereafter		
XIV.	Minimum	Rs. 1,000/- or 100 unit or account balance, whichever is lower in respect		
	Redemption/switch out amount	of each Option.		
		Note: The requirements w.r.t minimum redemption amount will not be		
		applicable for investment(s) made in the Scheme, pursuant to Clause 6.10 of SEBI Master Circular on 'Alignment of interest of Key		
		Employees('Designated Employees') of Asset Management Companies		
		(AMCs) with the Unitholders of the Mutual Fund Schemes'.		
		The requirements w.r.t minimum redemption units or account balance		
XV.	New Fund Offer	shall not be applicable for Units held in Demat mode. The New Fund Offer of the Scheme opened on July 27, 2018 and closed		
	Period	on August 10, 2018. The units under the Scheme were allotted on August		
	This is the period during which a new scheme	20, 2018.		
	sells its units to the			
	investors.			

XVI.	New Fund Offer Price:	Not Applicable
<b>AVI.</b>	This is the price per	not Applicable
	unit that the investors	
	have to pay to invest	
	during the NFO.	
XVII.		In case of a credit event at issuer level, the AMC may create a segregated
	disclosure	portfolio of rated and unrated debt and money market instruments under
		the Scheme in compliance with clause 4.4 of the SEBI Master Circular
		For detailed disclosure on segregated portfolio, kindly refer SAI.
XVIII	Swing pricing	Pursuant to the provisions of Clause 4.10 of SEBI Master Circular on
	disclosure	"Swing pricing framework for mutual fund schemes" SEBI had
		introduced swing pricing framework for open ended debt mutual fund
		schemes (except Overnight funds, Gilt funds and Gilt with 10-year
		maturity funds).
		'Swing pricing' refers to a process for adjusting a scheme's net asset value
		(NAV) to effectively pass on transaction costs stemming from net capital
		activity (i.e., flows into or out of the scheme) to the investors associated
		with that activity during the life of a scheme, excluding ramp-up period or
		termination. In a liquidity-challenged environment, quoted bid/ask
		spreads and overall trading cost can widen and may not be representative
		of the executed prices that can be achieved in the market.
		For detailed disclosure on swing pricing, kindly refer SAI.
XIX.	Stock Lending/ Short	The Scheme shall not engage in Short Selling and Securities Lending and
	Selling	Borrowing.
XX.	How to Apply and	New investors can purchase units of the Scheme by using an application
АЛ.	other details	form, whereas, existing Unit holders may use a transaction slip or
	other actumb	application form. Application forms or transaction slips will be available
		at the Investor Service Centres (ISCs)/ Official Points of Acceptance of
		transactions during Business Hours on Business Days. The same can also
		be downloaded from the website of the Mutual Fund viz.
		www.mahindramanulife.com. For details on updated list of ISCs / Official
		Points of Acceptance, investors may log on to 'Contact Us' section on our
		website <u>www.mahindramanulife.com</u> .
		Investors may also undertake transactions viz. purchase / redemption /
		switch through the AMC's online transaction portal available on its website viz., www.mahindramanulife.com and such other
		website viz., <u>www.mahindramanulife.com</u> and such other online/electronic modes / sources as communicated by the AMC from
		time to time. Further, the investors may also submit transactions in
		electronic modes offered by specified banks, financial institutions,
		distributors etc., with whom the AMC has entered or may enter into
		specific arrangements including through secured internet sites operated by
		CAMS.
		The duly completed application form/transaction slip as the case maybe,
		can be submitted at the designated ISCs / Official Points of Acceptance
		and will be subject to verification.
i		and win be subject to verification.

		Please refer	
		https://www.mahindramanulife.com/downloads#MANDATORY-	
		DISCLOSURES-+-Offer-Document-Related-Disclosures for list on	
		official points of acceptance or refer the back cover page.	
		For further detail, refer Section II.	
XXI.	Investor services	<ol> <li>For any General enquiries and/or queries kindly contact the Toll Free No. – 1800-419-6244 or email mfinvestors@mahindramanulife.com</li> <li>For any complaints including complaints with respect to any terms and conditions of/investments in this Scheme, the investors are advised to address a suitable communication to the AMC marked to the attention of Investor Relations Officer – Ms. Pooja Deherkar at 022 - 66327900 and mfinvestors@mahindramanulife.com. Written communications may also be forwarded to Mahindra Manulife Investment Management Private Limited at Unit No. 204, 2nd Floor, Amiti Building, Piramal Agastya Corporate Park, LBS Road, Kamani</li> </ol>	
XXII	Special	Junction, Kurla (West) 400070. <b>During the NFO</b> – Not Applicable	
~~~	product/facility		
	available during the	Ongoing basis:	
	NFO and on ongoing	Ongoing bubbs	
	basis	(I) Systematic Investment Plan (SIP): This facility enables the investors to save and invest at regular intervals over a longer period of time. It is convenient way to start investing, regular investment not only helps to reduce average unit acquisition cost (this concept is called 'Rupee Cost Averaging.') but also helps to inculcate discipline when it comes to investing. This facility gives the investor an opportunity to invest regularly thereby averaging the acquisition cost of units. Investors may register for SIP using a prescribed enrollment form or register through online modes.	
		a. SIP through Direct Debit / NACH Investors may also enroll for SIP facility through NACH (Debit Clearing) of the RBI or for SIP Direct Debit Facility available with specified Banks / Branches. In order to enroll for SIP Debit facility or NACH or Direct Debit Facility, an Investor must fill-up the Application Form for SIP NACH/ Direct Debit facility.	
		Note: Direct Debit facility will be offered at the discretion of the AMC and through select banks with whom AMC may have an arrangement, from time to time.	
		<b>b. SIP Top-up Facility</b> SIP Top-up Facility is a facility which provides flexibility to the investors to increase the amount of the SIP instalment by a fixed amount or by a fixed percentage at pre-defined intervals during the tenure of the SIP.	
		<b>c. Pause SIP facility</b> Pause SIP Facility is a facility under which the investor has an option to temporarily pause their registered SIP by submitting the prescribed form at any of the Official Points of Acceptance (OPATs) of the Fund or by submitting an application through the online transaction portal available on the Fund's website viz., <u>www.mahindramanulife.com</u>	

<b>d.</b> Micro Systematic Investment Plan ("MICRO SIP"): Investment in mutual fund schemes [including through Systematic Investment Plan (SIP)] upto Rs. 50,000 per year per investor, are exempt from the requirement of PAN. Such PAN exempt SIPs are referred to as Micro SIP.
e. Power SIP Facility ("the Facility") The Facility allows an investor to register an SIP (Systematic Investment Plan) cum SWP (Systematic Withdrawal Plan) in the eligible scheme(s) of the Fund for a specified duration. SWP instalments would commence on completion of the SIP tenure. The investor has the option to register the SIP and SWP in the same scheme or different scheme.
(II) Systematic Transfer Plan (STP): This facility enables the Unit holder to transfer fixed amount periodically from one scheme of the Mutual Fund ("Transferor Scheme") to another ("Transferee Scheme") by redeeming units of the Transferor Scheme at the Applicable NAV, subject to Exit Load, if any and investing the same amount in Transferee Scheme at the Applicable NAV, on a recurrent basis for a specified period at specified frequency as per the investor's STP mandate. Investors may register for STP using a prescribed enrollment form.
<b>a.</b> Capital Appreciation Systematic Transfer Plan (CASTP): "Capital Appreciation Systematic Transfer Plan (CASTP)" is a facility wherein unit holder(s) of "Transferor Scheme(s)" and in "Growth Option" of the Fund can opt to automatically invest regularly the capital appreciation amount, subject to a minimum capital appreciation amount of Rs 500 into the "Transferee Scheme(s)" of the Fund which is/are available for investment at that time. CASTP facility will be available to unit holder(s) holding units in non-demat form of the Transferor Scheme(s). Investors may register for CASTP using a prescribed enrollment form.
<b>b.</b> Flex Systematic Transfer Plan (Flex STP): Flex Systematic Transfer Plan (Flex STP) is a facility wherein unit holder(s) of designated open-ended scheme(s) of the Fund can opt to transfer variable amount(s) linked to value of investments, at pre- determined intervals from designated open-ended Scheme(s) of the Fund (hereinafter referred to as "Transferor Scheme") to the Growth Option of designated open-ended scheme(s) of the Fund (hereinafter referred to as "Transferee Scheme"). Investors may register for Flex STP using a prescribed enrollment form.
(III)Systematic Withdrawal Plan (SWP): SWP is a facility that enables Unitholders to withdraw specified amounts from the Scheme on a recurrent basis for a specified period at specified frequency by providing a single mandate/ standing instruction. The amount thus withdrawn by redemption will be converted into Units at Applicable NAV based prices and the number of Units so arrived at will be subtracted from the Units balance to the credit of that Unitholder. The provision of "Minimum Redemption Amount" of the Scheme shall not be

	applicable to SWP transactions. Investors may register for SWP using a prescribed enrollment form.
	(IV) Switching Options:
	<ul> <li>a) Inter - Scheme Switching option         Unitholders under the Scheme have the option to Switch part or all of their Unitholdings in the Scheme to any other Scheme offered by the Mutual Fund from time to time. The Mutual Fund also provides the Unitholders the flexibility to Switch their investments from any other scheme(s) / plan (s) offered by the Mutual Fund to this Scheme. This option will be useful to Unitholders who wish to alter the allocation of their investment among the scheme(s) / plan(s) of the Mutual Fund in order to meet their changed investment needs.     </li> </ul>
	The Switch will be effected by way of a Redemption of Units from the Scheme at Applicable NAV, subject to Exit Load, if any and reinvestment of the Redemption proceeds into another Scheme offered by the Mutual Fund at Applicable NAV and accordingly the Switch must comply with the Redemption rules of the Switch out Scheme and the Subscription rules of the Switch in Scheme.
	<ul> <li>b) Intra -Scheme Switching option         Unitholders under the Scheme have the option to Switch their Unit holding from one plan/option to another plan/option (i.e. Regular Plan to Direct Plan and Growth option to IDCW option and vice-a-versa), of respective units. The Switches would be done at the Applicable NAV based prices and the difference between the NAVs of the two options will be reflected in the number of Unit allotted.     </li> </ul>
	Switching shall be subject to the applicable "Cut off time and Applicable NAV" stated elsewhere in the Scheme Information Document. In case of "Switch" transactions from one scheme to another, the allocation shall be in line with Redemption payouts.
	(IV) Application / Transactions through Fax mode: Subject to the investor fulfilling certain terms and conditions as stipulated by the AMC from time to time, the AMC, Mutual Fund, or any other agent or representative of the AMC, Mutual Fund ("the Recipient") may accept and process any application, supporting documents and / or instructions submitted by an investor / Unit holder by facsimile ("Fax Submission") and the investor / Unit holder voluntarily and with full knowledge takes and assumes any and all risk associated therewith.
XXIII Weblink	<ul> <li>For further details and terms and conditions of above special products / facilities, kindly refer SAI.</li> <li>For details on Total Expense Ratio ('TER') and Scheme Factsheet please</li> </ul>
	refer below mentioned links: TER:
	For last 6 months and daily TER: https://www.mahindramanulife.com/downloads#mandatory-disclosures-+-Total- Expense-Ratio-of-Mutual-Fund-Schemes-+-Total-Expense-Ratio Factsheet:https://www.mahindramanulife.com/downloads#Investors-+- <u>Fund-Factsheet</u>

## **INTERPRETATION**

For all purposes of this Scheme Information Document, except as otherwise expressly provided or unless the context otherwise requires:

- All references to the masculine shall include the feminine and all references, to the singular shall include the plural and vice-versa.
- All references to "dollars" or "\$" refer to United States Dollars and "Rs" refer to Indian Rupees. A "crore" means "ten million" and a "lakh" means a "hundred thousand".
- All references to timings relate to Indian Standard Time (IST).
- References to a day are to a calendar day including a non-Business Day.

## DUE DILIGENCE BY THE ASSET MANAGEMENT COMPANY

It is confirmed that:

- i. The Scheme Information Document submitted to SEBI is in accordance with the SEBI (Mutual Funds) Regulations, 1996 and the guidelines and directives issued by SEBI from time to time.
- ii. All legal requirements connected with the launching of the Scheme as also the guidelines, instructions, etc., issued by the Government and any other competent authority in this behalf, have been duly complied with.
- iii. The disclosures made in the Scheme Information Document are true, fair and adequate to enable the investors to make a well informed decision regarding investment in the Scheme.
- iv. The intermediaries named in the Scheme Information Document and Statement of Additional Information are registered with SEBI and their registration is valid, as on date.
- v. The contents of the Scheme Information Document including figures, data, yields etc. have been checked and are factually correct.
- vi. The AMC has complied with the compliance checklist applicable for Scheme Information Documents and that there are no deviations from the regulations.
- vii. Notwithstanding anything contained in this Scheme Information Document, the provisions of the SEBI (Mutual Funds) Regulations, 1996 and the guidelines there under shall be applicable.
- viii. The Trustees have ensured that the Mahindra Manulife Dynamic Bond Fund approved by them is a new product offered by Mahindra Manulife Mutual Fund and is not a minor modification of any existing scheme/fund/product.

Date: May 26, 2025Signed: Sd/-Place: MumbaiName: Ravi DaymaDesignation: Head –Compliance & Legal, Company Secretary

## Part II. INFORMATION ABOUT THE SCHEME

## A. HOW WILL THE SCHEME ALLOCATE ITS ASSETS?

The Asset Allocation Pattern of the Scheme under normal circumstances would be as under:

Instruments	Indicative Allocation (% of total assets)	
	Minimum	Maximum
Debt* & Money Market instruments	0%	100%
Units issued by REITs & InvITs	0%	10%

\* Includes securitized debt and debt instruments having structured obligations/credit enhancements (such as corporate / promoter guarantee, conditional and contingent liabilities, covenants, pledge and / or Non Disposal Undertaking of shares etc) upto 35% of the net assets of the Scheme.

Further, the investment by the Scheme in the following instruments shall not exceed 10% of the debt portfolio of the Scheme and the group exposure in such instruments shall not exceed 5% of the debt portfolio of the Scheme:

- a. Unsupported rating of debt instruments (i.e. without factoring-in credit enhancements) is below investment grade and
- b. Supported rating of debt instruments (i.e. after factoring-in credit enhancement) is above investment grade.

For the purpose of this provision, 'Group' shall have the same meaning as defined in Clause 12.9.3.3 of SEBI Master Circular.

These limits shall not be applicable on investments in securitized debt instruments, as defined in SEBI (Public Offer and Listing of Securitized Debt Instruments) Regulations 2008.

Investment in debt instruments, having credit enhancements backed by equity shares directly or indirectly, shall have a minimum cover of 4 times considering the market value of such shares.

Investment in Derivatives – up to 50% of the net assets of the Scheme. Investment in derivatives shall be for hedging, portfolio balancing and such other purposes as maybe permitted from time to time.

The Scheme may invest in Credit Default Swaps (CDS) in accordance with Clause 12.28 of SEBI Master Circular.

Pursuant to the provisions of Clause 4.6 of SEBI Master Circular read with AMFI Best Practice Guidelines circular ref. no. 135/BP/117/2024-25 dated November 13, 2024, the Scheme shall hold (i) at least 10% of its net assets in liquid assets; OR (ii) liquid assets basis Liquidity Ratio based on 30 - day Redemption at Risk (i.e LR – RaR) whichever is higher. For this purpose, "liquid assets" for (LR-RaR) shall include Cash, net settlement receivables, Government Securities, T-bills and Repo on Government Securities.

In addition to the above, the Scheme shall also maintain the Liquidity ratio based on 30-day Conditional Redemption at Risk (LR-CRaR) in eligible assets for LR-CRaR, in accordance with the guidelines / computation methodology (including definition of eligible assets for this purpose), as provided in the AMFI Best Practices Guidelines circular dated November 13, 2024..

It shall be ensured that the liquid assets / eligible assets are maintained to the extent of the LR-RaR and LR-CRaR ratios. In case, the exposure in such liquid assets / eligible assets falls below the prescribed threshold levels of net assets of the Scheme, the AMC shall ensure that the LR-RaR and LR-CRaR ratios are restored

to 100% of the required level(s) by ensuring that the net inflows (through net subscription/accruals/ maturity & sale proceeds) into the Scheme are used for restoring the ratios before making any new purchases outside 'Liquid Assets / Eligible Assets' as specified in the above referred circular(s).

The Scheme shall not invest in Foreign Securities. The Scheme shall not engage into Securities Lending and borrowing.

The Scheme may undertake repo / reverse repo transactions in corporate debt securities in accordance with the directions issued by RBI and SEBI from time to time. Such investment shall be made subject to the guidelines which may be prescribed by the Board of Directors of the AMC and Trustee Company and subject to following exposure limits:

- a. The gross exposure of the Scheme to repo transactions in corporate debt securities shall not be more than 10 % of the net assets of the Scheme.
- b. the cumulative gross exposure through repo transactions in corporate debt securities alongwith investments in debt securities, money market instruments, units issued by REITs & InvITs and exposure in derivatives' positions shall not exceed 100% of the net assets of the Scheme.

All of the Scheme's assets will be invested in transferable securities. The corpus of the Scheme shall not in any manner be used in option trading, short selling or carry forward transactions as stipulated in SEBI Regulations and amended from time to time.

## **Investment in CDMDF**

In accordance with the requirement of Regulation 43A of SEBI (Mutual Funds) Regulations, 1996 read with read with Chapter 16A on 'Investment by Mutual Fund Schemes and AMCs in units of Corporate Debt Market Development Fund' of SEBI Master Circular', the Scheme shall invest 25 bps of its AUM as on December 31, 2022 in the units of the Corporate Debt Market Development Fund ('CDMDF') within 10 working days from the request of CDMDF. Further, an incremental contribution to CDMDF shall be made every six months within 10 working days from the end of half year starting from December 2023 to ensure 25 bps of the Scheme's AUM is invested in units of CDMDF. However, if AUM decreases, there shall be no return or redemption from CDMDF. Contribution made to CDMDF, including the appreciations on the same, if any, shall be locked-in till winding up of the CDMDF.

However, in case of winding up of contributing scheme, inter-scheme transfers within the same Mutual Fund or across Mutual Funds may be undertaken.

Further, investments in CDMDF units shall not be considered as violation while considering maturity restriction as applicable for various purposes (including applicable Investment limits) and the calculations of Potential Risk Class (PRC) Matrix, Risk-o-meter, Stress testing and Duration for various purposes shall be done after excluding investments in units of CDMDF. CDMDF shall not be considered as an "associate" of the Fund and investment made in units of CDMDF in accordance with the above referred regulatory requirements, shall not be considered as investment in associate or group company of the Fund. Pursuant to the Clause 2.10 of SEBI Master circular for calculation of asset allocation limits of the Scheme in terms of the applicable regulatory guidelines, investment in units of CDMDF shall be excluded from base of net assets.

All the investments by the Mutual Fund under the scheme shall be guided by investment restrictions as specified in SEBI (Mutual Funds) Regulations, 1996 from time to time.

Cash and cash equivalents with residual maturity of less than 91 days may be treated as not creating any exposure. SEBI vide its letter dated November 3, 2021 issued to AMFI, has clarified that for the purpose of Clause 12.25 of SEBI Master Circular, cash equivalent shall consist of :-

- 1. Government Securities;
- 2. T-Bills; and
- 3. Repo on Government Securities.

As per Clause 12.24 of SEBI Master Circular, the cumulative gross exposure through repo transactions in corporate debt securities alongwith investments in debt securities, money market instruments, units issued by REITs & InvITs and exposure in derivatives' positions shall not exceed 100% of the net assets of the Scheme.

Since the investments in short term deposits of scheduled commercial banks is allowed pending deployment of funds of a scheme, the same shall also be excluded while calculating sector exposure.

Pending deployment of the funds in securities in terms of investment objective of the Scheme, the AMC may in terms of Clause 12.16 of SEBI Master Circular, park the funds of the Scheme in short term deposits of the Scheduled Commercial Banks.

The Scheme retains the flexibility to invest across all the securities in the debt and Money Market Instruments. The portfolio may hold cash depending on the market condition. The fund manager can use Derivative instruments to protect the downside risk.

The Scheme may review the above pattern of investments based on views on interest rates and asset liability management needs. However, at all times the portfolio will adhere to the overall investment objectives of the Scheme.

## Securities/ Instruments in which scheme shall not invest are as follows:

Sr. No.	Security/Instrument	
1.	Overseas securities / Foreign Securities	
2.	Debt instruments with special features (AT1 & AT2 Bonds) in terms	
	of the Clause 12.2 of SEBI Master Circular	
3.	Securities Lending and borrowing	

## Indicative Table (Actual instruments/percentages may vary subject to applicable SEBI circulars):

Sr. No.	• 1	Percentage of Exposure	Circular references		
	Instrument				
1.	Units issued by REITs & InvITs	Upto 10% of net assets of the Scheme.	Clause 13 of Seventh Schedule of SEBI (Mutual Funds) Regulations, 1996		
2.	Derivatives	Up to 50% of Net Asset of the Scheme	Clause 12.25 of SEBI Master Circular.		
3.	Repo /Reverse repo transactions in corporate debt securities	Upto 10 % of net assets of the Scheme	Clause 12.18 of SEBI Master Circular.		
4.	Securitized debt	Upto 35% of net assets of the Scheme.	Clause 12.15 of SEBI Master circular		

5.	Debt instruments having Structured Obligations /Credit Enhancements	Please refer details provided under the Asset Allocation para above for the additional limits pertaining to Debt instruments having Structured Obligations /	Clause 12.3 of SEBI Master Circular
6.	Units of Mutual Fund schemes	Credit Enhancements. Subject to applicable regulatory limits.	Clause 4 of the Seventh Schedule of SEBI (Mutual Funds) Regulations,
	T und senemes		1996
7.	Credit Default Swaps	In accordance with Clause 12.28 of SEBI Master Circular	Clause 12.28 of SEBI Master Circular.
8.	Units of Corporate Debt Market Development Fund	Subject to applicable regulatory limits. Please refer the para 'Investment in CDMDF' above for details.	Regulation 43A of SEBI (Mutual Funds) Regulations, 1996 read with Chapter 16A on 'Investment by Mutual Fund Schemes and AMCs in units of Corporate Debt Market Development Fund' of SEBI Master Circular

## **Portfolio rebalancing:**

#### **Rebalancing due to Short Term Defensive Consideration**

Due to market conditions, the AMC may deviate the range set out in the asset allocation. Such deviations shall normally be for a short term and defensive considerations as per Clause 1.14.1.2.b of the SEBI Master Circular, and the fund manager will rebalance the portfolio within 30 calendar days from the date of deviation.

#### **Rebalancing due to Passive Breaches**

Further, as per Clause 2.9 of the SEBI Master Circular, as may be amended from time to time, in the event of deviation from mandated asset allocation due to passive breaches (occurrence of instances not arising out of omission and commission of the AMC), the fund manager shall rebalance the portfolio of the Scheme within 30 Business Days. In case the portfolio of the Scheme is not rebalanced within the period of 30 Business Days, justification in writing, including details of efforts taken to rebalance the portfolio shall be placed before the Investment Committee of the AMC. The Investment Committee, if it so desires, can extend the timeline for rebalancing up to sixty (60) Business Days from the date of completion of mandated rebalancing period. Further, in case the portfolio is not rebalanced within the aforementioned mandated plus extended timelines the AMC shall comply with the prescribed restrictions, the reporting and disclosure requirements as specified in Clause 2.9 of SEBI Master Circular.

## **B. WHERE WILL THE SCHEME INVEST?**

Subject to the Regulations, the corpus of the Scheme can be invested in any (but not exclusively) of the following securities as permitted by SEBI/ RBI from time to time:

#### 1. Debt & Money Market Instruments:

- i. Certificate of Deposits (CD)
- ii. Commercial Paper (CP)
- iii. Bills Rediscounting (BRD)

- iv. Securities issued by the Central and State Governments as may be permitted by RBI, securities guaranteed by the Central and State Governments (including but not limited to coupon bearing bonds, zero coupon bonds and treasury bills).
- v. Treasury Bills (T-Bills)
- vi. Repos/reverse repos in Government Securities as may be permitted by RBI (including but not limited to coupon bearing bonds, zero coupon bonds and treasury bills).
- vii. Repos/reverse repo transactions in Corporate Debt securities.
- viii. Triparty Repo (TREPS).
  - ix. Debt securities of domestic Government agencies and statutory bodies, which may or may not carry a Central/State Government guarantee.
  - x. Corporate debt and securities (of both public and private sector undertakings) including Bonds, Debentures, Notes, Strips etc.
  - xi. Money market instruments permitted by SEBI/RBI, including TREPS (Tri-Party Repo) market or in alternative investment for the TREPS market as may be provided by the RBI to meet the short term liquidity requirements.
- xii. Investment in Structured Obligations (such as corporate / promoter guarantee, conditional and contingent liabilities, covenants, pledge and / or Non Disposal Undertaking of shares etc).
- xiii. Securitised Debt Instruments.
- xiv. Pass through, Pay through or other Participation Certificates, representing interest in a pool assets including receivables.
- xv. Debt Derivative instruments like Interest Rate Swaps, Forward Rate Agreements and such other derivative instruments permitted by SEBI/RBI.
- xvi. Investment in CDMDF.
- 2. Investment in Short Term Deposits.
- 3. Investments in units of mutual fund schemes
- 4. Investment in Units issued by REITs & InvITs.
- 5. Any other like instruments as may be permitted by RBI/SEBI/ such other Regulatory Authority from time to time.

For detailed definition and applicable regulations/guidelines for each instrument, kindly refer Section II of the SID.

The securities / instruments mentioned above and such other securities the Scheme is permitted to invest in could be listed, unlisted, privately placed, secured, unsecured, rated or unrated and of any maturity.

The securities may be acquired through initial public offering (IPOs), secondary market, private placement, rights offers, negotiated deals. Further investments in debentures, bonds and other fixed income securities will be in instruments which have been assigned investment grade rating by the Credit Rating Agency.

Investment in unrated debt instruments shall be subject to complying with the provisions of the Regulations and within the limit as specified in Seventh Schedule to the Regulations. Pursuant to Clause 12.12.1 of SEBI Master Circular, the AMC may constitute committee(s) to approve proposals for investments in unrated debt instruments. The AMC Board and the Trustee shall approve the detailed parameters for such investments. However, in case any unrated debt security does not fall under the parameters, the prior approval of Board of AMC and Trustee shall be sought.

For applicable regulatory investment limits please refer paragraph "Investment Restrictions".

The Fund Manager reserves the right to invest in such securities as maybe permitted from time to time and which are in line with the investment objectives of the Scheme.

## C. WHAT ARE THE INVESTMENT STRATEGIES?

The Scheme seeks to generate returns for its investors through an active management of its portfolio of debt and money market instruments. The active management would involve changing the duration of the portfolio, changing the allocation between corporate debt securities and gilts and positioning for exploiting any anomalies in the term structure of the yield curve.

The Fund Manager will initiate and manage the portfolio after analyzing the macro-economic environment including future course of system liquidity, interest rates and inflation along with other considerations in the economy and markets. The Fund Manager will also seek to play the movement in the credit spreads and also look at the term structure of the credit curve while deciding on the portfolio allocation. The Fund Manager may also initiate tactical allocation in the portfolio according to the prevalent market conditions in order to generate alpha in the Scheme.

The investment team of the AMC will, as a mitigation and risk control procedure, carry out rigorous credit evaluation of the issuer company proposed to be invested in. The credit evaluation will analyse the operating environment of the issuer, the sector analysis, business model, management, governance practices, quality of the financials, the past track record as well as the future prospects of the issuer and the financial health of the issuer.

The investment team follows Risk Guard process - an internal research and process framework that focusses on the quality of business, financial and management, for security selection and monitoring. Also as a part of the risk mitigation framework, the investment team would keep adequate liquidity buffers in form of liquid securities to manage any drawdowns.

## **Derivatives Strategy:**

The Scheme may use Derivative instruments like interest rate swaps like Overnight Indexed Swaps ("OIS"), forward rate agreements, interest rate futures (as and when permitted) or such other Derivative instruments as may be permitted under the applicable regulations. Derivatives will be used for the purpose of hedging, and portfolio balancing or such other purpose as may be permitted under the regulations and Guidelines from time to time.

The Fund will be allowed to take exposure in interest rate swaps only on a non-leveraged basis. A swap will be undertaken only if there is an underlying asset in the portfolio. In terms of Circular No. MFD.BC.191/07.01.279/1999-2000 and MPD.BC.187/07.01.279/1999-2000 dated November 1, 1999 and July 7, 1999 respectively issued by RBI permitting participation by Mutual Funds in interest rate swaps and forward rate agreements, the Fund will use Derivative instruments for the purpose of hedging and portfolio balancing. The Fund may also use derivatives for such purposes as maybe permitted from time to time. Further, the guidelines issued by RBI from time to time for forward rate agreements and interest rate swaps and other derivative products would be adhered to by the Mutual Fund.

IRS and FRA do also have inherent credit and settlement risks. However, these risks are substantially reduced as they are limited to the interest streams and not the notional principal amounts.

Investments in Derivatives will be in accordance with the extant Regulations / guidelines. Presently Derivatives shall be used for hedging and / or portfolio balancing purposes, as permitted under the Regulations. The circumstances under which such transactions would be entered into would be when,

for example using the IRS route it is possible to generate better returns / meet the objective of the Scheme at a lower cost. e.g. if buying a 2 Yr FBIL Mibor based instrument and receiving the 2 Yr swap rate yields better return than the 2 Yr AAA corporate, the Scheme would endeavor to do that. Alternatively, the Scheme would also look to hedge existing fixed rate positions if the view on interest rates is that it would likely rise in the future.

For details of various derivative strategies/examples of use of derivatives, please refer SAI of the Fund.

#### **Portfolio Turnover:**

The Scheme being an open-ended Scheme, it is expected that there would be a number of Subscriptions and Redemptions on a daily basis. Further, in the debt market, trading opportunities may arise due to changes in system liquidity, interest rate policy announced by RBI, shifts in the yield curve, credit rating changes or any other factors. In the opinion of the fund manager these opportunities can be played out to enhance the total return of the portfolio, which will result in increase in portfolio turnover. There may be an increase in transaction cost such as brokerage paid, if trading is done frequently. However, the cost would be negligible as compared to the total expenses of the Scheme. Frequent trading may increase the profits which will offset the increase in costs. The fund manager will endeavour to optimize portfolio turnover to maximize gains and minimize risks keeping in mind the cost associated with it. However, it is difficult to estimate with reasonable measure accuracy, the likely turnover in the portfolio of the Scheme. The Scheme has no specific target relating to portfolio turnover.

**Derivative market:** Derivatives markets have grown over the year. There are mainly three types of derivatives in the Indian market.

- 1. **Interest Rate Swap** An Interest Rate Swap ("IRS") is a financial contract between two parties exchanging or swapping a stream of interest payments for a "notional principal" amount on multiple occasions during a specified period.
- 2. **Forward Rate Agreement** A Forward Rate Agreement ("FRA") is a financial contract between two parties to exchange interest payments for a notional principal amount on settlement date, for a specified period from start date to maturity date.
- 3. **Interest Rate Futures:** A futures contract is a standardized, legally binding agreement to buy or sell a commodity or a financial instrument in a designated future month at a market determined price (the futures price) by the buyer and seller.

## **Risk Control:**

Risk is an inherent part of the investment function. Effective risk management is critical to fund management for achieving financial soundness. Since investing requires disciplined risk management, the AMC would incorporate adequate safeguards for controlling risks in the portfolio construction process. The risk control process involves reducing risks through portfolio diversification; The AMC believes that this diversification would help achieve the desired level of consistency in returns. The AMC aims to identify securities, which offer superior levels of yield at lower levels of risks. With the aim of controlling risks, rigorous in-depth credit evaluation of the securities proposed to be invested in will be carried out by the investment team of the AMC. Risk control would involve managing risk in order to keep it in line with the investment objective of the Scheme. AMC has implemented a robust Front Office System (FOS) for this purpose. The system has incorporated all the investment restrictions as per SEBI guidelines and "soft" warning alerts at appropriate levels for preemptive monitoring.

The system enables identifying & measuring the risk through various risk measurement tools like various risk ratios, average duration and analyzes the same and acts in a preventive manner.

#### **Risk Management Framework to mitigate Liquidity Risk**

Liquidity is a measure of ease with which an asset can be liquidated without experiencing material exit barriers or considerable loss of value. Further, Liquidity Risk or mismatch for the Scheme could be defined as a situation where meeting its financial obligations could be uncertain. The AMC has adopted a comprehensive liquidity risk management framework in accordance with the extant regulatory framework, to mitigate potential mismatches between the Scheme's assets and liabilities in order to protect the interest of investors of the Scheme.

Some of the liquidity management tools which also encompass applicable regulatory requirements, implemented by the AMC are listed below:

**Liquidity Ratios** – One of the factors determining the liquidity of the Scheme is the composition of its portfolio in terms of its assets as different types of instruments exhibit different market depths. The AMC endeavors to ensure that the Scheme is invested in securities with sufficient liquidity by maintaining prescribed liquidity ratios. The asset size, potential heightened redemptions evolving from historical redemption statistics and concentrations of investors and distributors determine these liquidity ratios thus looking at the asset side liquidity in conjunction with the liability side. The ratios are reset and monitored on timely basis by the AMC in line with the applicable regulatory requirements.

Calculating and monitoring the Liquidity Ratios defines Liquidity Risk arising from the liability side and covers all potential liquidity risk scenarios upto 99% confidence interval. It also has remedial measures both for managing this risk on an ongoing basis (LR-RaR & LR-CRaR) as well as action plan in case there is a difference between actual outcome and projected outcome.

For more details, please refer Point no. A "HOW WILL THE SCHEME ALLOCATE ITS ASSETS? of Part II – "INFORMATION ABOUT THE SCHEME" under Section I.

#### Potential Risk Class (PRC) Matrix and Risk-o-meter

The liquidity of the fund is also impacted by its duration and credit profile. The fund is classified in terms of the PRC matrix and risk-o-meters for the fund and its benchmark. This is done considering the allowable thresholds of interest rate risk and credit risk as per regulations. The PRC matrix and risk-o-meter of the fund are monitored on timely basis to ensure that the fund is operating within its interest rate and credit risk appetite. Remedial measures to treat exceptions have been put in place by the AMC.

**Stress Testing** – The ability of the fund to generate liquidity is impacted by the dynamic liquidity conditions in the market. Hence it is not prudent to assume that normal stress-free environment shall always prevail in the market. The AMC monitors impact of adverse events in terms of interest rate risk, liquidity risk and credit risk on the NAV of the fund. The portfolio of the fund is subjected to stress defined by the above and the impact on the fund NAV is compared against dynamic thresholds on timely basis. Deviations if any are addressed according to the regulations to ensure the portfolio is sufficiently prepared to better handle such unprecedented shocks.

**Bucketing of Assets and Liabilities** – Liquidity of the fund is subject to test if there is a mismatch between the residual maturity of its assets and the redemptions faced by the fund. Therefore, the assets of the fund are segregated into maturity buckets are compared against the thresholds determined in accordance with maximum drawdown experienced by the fund.

**Concentration Monitoring** – Higher concentration of investors or distributors in a Scheme could culminate into sizable redemptions which may be difficult to manage if the Scheme portfolio is not prepared. The AMC monitors the concentration at investor and distributor level and its trend over a period of time to detect potential concerns of large redemptions.

**Swing Pricing** – Since the nature of the market is dynamic and sensitive to macroeconomics there could be phases of extreme liquidity stress in the market. In such situations the bid-ask spreads of any of the assets could widen beyond expectations which may impact the indicative prices in the market. In such scenarios subject to the applicable regulatory requirements, swing pricing framework could be invoked to adjust the NAVs of the Scheme(s) for fair treatment to all investors of the Scheme(s).

With all the above-mentioned tools and processes in place which aim to protect the interest of the investors of the fund, the AMC has incorporated a robust liquidity risk management framework.

## D. HOW WILL THE SCHEME BENCHMARK ITS PERFORMANCE?

**Benchmark (Total Returns Index):** The Scheme performance would be benchmarked against the CRISIL Dynamic Bond A-III Index (First Tier Benchmark).

The Trustee may change the benchmark in future if a benchmark better suited to the investment objective of the Scheme is available.

## Justification for use of benchmark

The composition of the CRISIL Dynamic Bond A-III Index is such that it is most suited in line with the investment strategy and portfolio construct of the Scheme for comparing performance of the Scheme.

The constituents and weights of CRISIL Dynamic Bond A-III Index are as under:

Constituents	Applicable Weight as on January 2025
AAA 3 to 5 Years Bonds	22%
AAA 5 Years & Above Bonds	28%
CRISIL Dynamic Gilt Index	50%

The Trustee reserves the right to change the benchmark for the evaluation of the performance of the Scheme from time to time, keeping in mind the investment objective of the Scheme and the appropriateness of the benchmark, subject to the Regulations and other prevalent guidelines.

## E. WHO MANAGES THE SCHEME?

The Scheme will be managed by Mr. Rahul Pal.

Name of the Fund Manager	Age and Educational Qualification	Tenure for which the Fund Manager has been managing the Scheme	Experience of the Fund Manager in the last 10 years	Names of other schemes under his management
Mr. Rahul	49 years	6 Years and 10	• Chief Investment	• Fund Manager of
Pal	B.Com (H), ACA	Months (Managing since August 20,2018)	Officer – Fixed Income, Mahindra Manulife Investment Management Pvt. Ltd. (MMIMPL), (June 2022 - until date) • Head – Fixed Income, MMIMPL (September 2015 – May 2022);	<ul> <li>Low Duration Fund and Mahindra Manulife Short Duration Fund.</li> <li>Co – Fund Manager of Mahindra Manulife Liquid</li> </ul>

• Head Fixed Income,	Duration Fund and
Taurus Asset	Mahindra Manulife
Management Co. Ltd.	Overnight Fund.
(May 2010 –	• Fund Manager of the
September 2015);	Debt portion of
• Fund Manager – Fixed	Mahindra Manulife
Income, Sundaram	Equity Savings Fund,
Asset Management	Mahindra Manulife
Co. Ltd. (May 2004 -	Aggressive Hybrid
May 2010).	Fund, Mahindra
-	Manulife Arbitrage
	Fund ,Mahindra
	Manulife Balanced
	Advantage Fund and
	Mahindra Manulife
	Multi Asset
	Allocation Fund.

## F. HOW IS THE SCHEME DIFFERENT FROM EXISTING SCHEMES OF THE MUTUAL FUND?

Sr. No.	Scheme Name	Website Link for detailed comparative
		table
1	Mahindra Manulife Dynamic Bond Fund	Please Refer
2	Mahindra Manulife Short Duration Fund	https://www.mahindramanulife.com/down
3	Mahindra Manulife Low Duration Fund	loads#MANDATORY-DISCLOSURES-
4	Mahindra Manulife Ultra Short Duration Fund	+-Offer-Document-Related-Disclosures
5	Mahindra Manulife Liquid Fund	for detailed comparative table for scheme
6	Mahindra Manulife Overnight Fund	differentiation.

## G. HOW HAS THE SCHEME PERFORMED?



## 1. Absolute Returns of the Scheme for each financial year for the last 5 years:

Compounded Annualised Returns	Mahindra Manulife Dynamic Bond Fund (Scheme Returns %)		Benchmark Returns (%)	
	Regular Plan Direct Plan		CRISIL Dynamic Bond A-III Index	
Returns for the last 1 year	10.38%	11.68%	10.97%	
Returns for the last 3 year	6.85%	8.07%	7.76%	
Returns for the last 5 year	5.16%	6.35%	6.73%	
Returns since inception	5.47%	6.66%	8.11%	
Date of allotment/inception		2	0-Aug-18	

2. Compounded Annualized Returns of the scheme as on April 30, 2025:-

Note: The "since inception" returns are calculated on Rs 10/- invested at inception. For this purpose, inception date is deemed to be the date of allotment. The "returns" shown above are for the growth option. Past performance may or may not be sustained in future and should not be used as a basis for comparison with other investments.

## H. ADDITIONAL SCHEME RELATED DISCLOSURES

## i. Scheme's portfolio holdings:

Please visit <u>https://www.mahindramanulife.com/downloads#MANDATORY-</u> <u>DISCLOSURES-+-Additional-portfolio-disclosure</u> for details on Scheme's portfolio holdings (top 10 holdings by issuer and fund allocation towards various sectors)

## ii. Latest Fortnightly/Monthly/ Half Yearly portfolio holdings of the Scheme:

Fortnightly Portfolio Holdings:

https://www.mahindramanulife.com/downloads#mandatory-disclosures-+-Fortnightly-Debt-Portfolio-Disclosures

Monthly Portfolio Holdings: <u>https://www.mahindramanulife.com/downloads#mandatory-disclosures-+-Monthly-Portfolio-Disclosure</u>

Half Yearly portfolio holdings of the Scheme: <u>https://www.mahindramanulife.com/downloads#Financials-+-Mutual-Fund-Financials-+-</u> <u>Half-Yearly-Unaudited-Financials-and-Portfolio-Disclosure</u>

Portfolio Turnover Rate of the Scheme as on April 30, 2025: Not applicable

## iii. Aggregate Investment in The Scheme

	Aggregate Investment in the Scheme as on April 30, 2025					
Sr.	Sr. Category of Persons		Net Value			
No.	No.		(in Rs.)			
	Concerned scheme's Fund	Units	NAV per unit*			
	Manager(s)					
1.	Mr. Rahul Pal	12759.173	15.3976	196,460.64		

\*NAV per unit of the Scheme/ Plan in which investments have been made.

For any other disclosure w.r.t investments by key personnel and AMC directors including regulatory provisions in this regard kindly refer SAI.

## iv. Investments by the AMC in the Scheme:

Subject to the Regulations and to the extent permitted by SEBI from time to time, the AMC may invest in the Scheme. However, the AMC will not charge investment management fee on such investment in the Scheme.

Further, in accordance with Regulation 25(16A) of the SEBI (Mutual Funds) Regulations 1996 read with clause 6.9 SEBI Master Circular, the AMC shall invest such amount in the Scheme, based on the risk associated with the scheme, as may be specified by SEBI from time to time.

The AMC shall also conduct a quarterly review to ensure compliance with the requirement of investment of minimum amount in the Scheme which may change either due to change in value of the AUM or in the risk value assigned to the Scheme. Further, based on review of quarterly average AUM, shortfall in value of the investment in Scheme, if any, shall be made good within 7 days of such review. Such details of investment shall be disclosed on the website of the AMC and AMFI.

For further details, please visit <u>https://www.mahindramanulife.com/downloads#mandatory-disclosures</u>.

## **Investment by the AMC in units of CDMDF**

Pursuant to Regulation 43A of SEBI (Mutual Funds) Regulations, 1996 and read with Chapter 16A on 'Investment by Mutual Fund Schemes and AMCs in units of Corporate Debt Market Development Fund' of SEBI Master Circular, the AMC shall make a one-time contribution equivalent to 2 bps of the AUM of the specified debt oriented schemes of the Fund as on December 31, 2022 in the units of the Corporate Debt Market Development Fund ('CDMDF') within 10 working days of request from CDMDF. Contribution made to CDMDF, including the appreciations on the same, if any, shall be locked-in till winding up of the CDMDF.

In case of delay in contribution by the Scheme and AMC, the AMC shall be liable to pay interest at fifteen percent (15%) per annum for the period of delay.

## PART III- OTHER DETAILS

## A. COMPUTATION OF NAV

The Net Asset Value (NAV) per unit of the Scheme for each option will be computed by dividing the net assets of the Scheme by the number of units outstanding on the valuation day. The Mutual Fund will value its investments according to the valuation norms, as specified in Eighth Schedule of the SEBI (MF) Regulations, or such norms as may be specified by SEBI from time to time.

The NAV of the Units under the Scheme will be calculated on a daily basis as shown below:

NAV per unit (Rs.) =	(Market / Fair Value of Scheme's Investments + Current Assets including Accrued Income - Current Liabilities and Provisions)
	No. of units outstanding under the Scheme / Option on the valuation day

The NAV shall be calculated/rounded up to four decimal places. However, the AMC reserves the right to declare the NAVs up to additional decimal places as it deems appropriate. Separate NAV will be calculated and disclosed for each Plan/Option. The NAVs of the Growth Option and the Income Distribution cum Capital Withdrawal/IDCW Option will be different after the declaration of the first IDCW. The AMC will calculate and disclose the NAV of the Scheme on all the Business Days.

#### Illustration on Computation of NAV for a Scheme has been provided below:

Particulars	Amount in Rs
Market or Fair Value of Scheme's investments	8,66,42,94,753.00
Current Assets including accrued income	15,00,000.00
Current Liabilities and Provisions	5,00,000.00

No. of Units outstanding under the Scheme = 33,81,85,338.724

The NAV per unit will be computed as follows: NAV per unit (Rs.) =  $\frac{8,66,42,94,753.00+15,00,000.00}{33,81,85,338.724}$ 

NAV per unit (Rs.) = 25.6229

Note : The aforesaid provisions pertaining to "Calculation of NAV" shall apply in respect of each individual Scheme and/or plan as the case may be. The NAV per unit above is rounded off to four decimals.

## • Methodology of calculating the sale price

The price or NAV a unitholder is charged while investing in an open-ended scheme is called sale / subscription price. Pursuant to Clause 10.4.1.(a) of the SEBI Master Circular, no entry load will be charged by the Scheme to the unitholders.

Therefore, Sale / Subscription price = Applicable NAV

## • Methodology of calculating the repurchase price

Repurchase or redemption price is the price or NAV at which an open-ended scheme purchases or redeems its units from the Unitholders. It may include exit load, if applicable. The exit load, if any, shall be charged as a percentage of Net Assets Value (NAV) i.e. applicable load as a percentage of NAV will be deducted from the "Applicable NAV" to calculate the repurchase price.

Therefore, Repurchase / Redemption Price = Applicable NAV \*(1 - Exit Load, if any)

For example, If the Applicable NAV of the Scheme is Rs. 10 and the Exit Load applicable at the time of investment is 2% if redeemed before completion of 1 year from the date of allotment of units and the Unitholder redeems units before completion of 1 year, then the repurchase/redemption price will be:

= Rs. 10\*(1-0.02) = Rs. 9.80

As per Regulation 49 (3) of the SEBI (MF) Regulations, while determining the price of the units, the mutual fund shall ensure that the repurchase price of an open ended scheme is not lower than 95 per cent of the Net Asset Value.

For other details such as policies w.r.t computation of NAV, rounding off, investment in Foreign Securities, procedure in case of delay in disclosure of NAV etc. refer to SAI.

## **B.** NEW FUND OFFER (NFO) EXPENSES

These expenses are incurred for the purpose of various activities related to the NFO like sales and distribution fees, paid marketing and advertising, Registrar and Transfer Agent expenses, printing and stationary, bank charges etc.

In accordance with regulatory guidelines, the NFO expenses were borne by the AMC.

## C. ANNUAL SCHEME RECURRING EXPENSES

These are the fees and expenses for operating the Scheme. These expenses include Investment Management and Advisory Fee charged by the AMC, Registrar and Transfer Agents' fee, marketing and selling costs etc. as given in the table below:

The AMC has estimated that upto 2.00 % of the daily net assets of the Scheme will be charged to the Scheme as expenses on an AUM since upto Rs. 500 crores. For the actual current expenses being charged, the Investor should refer to the website of the Fund/AMC.

Sr. No	Expense Head	% p.a of daily Net Assets*(Estimated p.a)
(i)	Investment Management and Advisory Fees	
(ii)	Audit Fees / Fees and expenses of Trustees	
(iii)	Custodial Fees	
(iv)	Registrar & Transfer Agent Fees including cost of providing Account statements / IDCW / redemption cheques/ warrants	
(v)	Marketing & Selling Expenses including Agents Commission and Statutory advertisement	Upto 2.00%
(vi)	Costs related to investor communications	
(vii)	Costs of fund transfer from location to location	
(viii)	Cost towards investor education & awareness	
(ix)	Brokerage & transaction cost pertaining to distribution of units	
(x)	Goods & Services Tax on expenses other than investment and advisory fees	
(xi)	Goods & Services Tax on brokerage and transaction cost	
(xii)	Other Expenses# (to be specified as per Reg 52 of SEBI MF Regulations)	
(A)	Maximum total expense ratio (TER) permissible under Regulation 52 (6) (c)	Upto 2.00%
(C)	Additional expenses for gross new inflows from specified cities	Upto 0.30%*

#Any other expenses which are directly attributable to the Scheme, may be charged with approval of the Trustee within the overall limits as specified in the SEBI (MF) Regulations except those expenses which are specifically prohibited.

\* In line with AMFI communication no.35P/MEM-COR/85-a/2022-23 dated March 2, 2023 and SEBI letter no. SEBI/H0/IMD/IMD-SEC-3/P/OW/2023/5823/1 dated February 24, 2023, the B-30 incentive structure is kept in abeyance from March 1, 2023, till appropriate re-instatement of incentive structure by SEBI with necessary safeguards.

The purpose of the above table is to assist the investor in understanding the various costs & expenses that the investor in the Scheme will bear directly or indirectly. These estimates have been made in good faith as per the information available to the AMC and the above expenses (including investment management and

advisory fees) are subject to inter-se change and may increase/decrease as per actual and/or any change in the Regulations, as amended from time to time.

The total expenses of the Scheme including Investment Management and Advisory Fees under Regulation 52 (2) and the various sub-heads of recurring expenses mentioned under Regulation 52 (4) shall not exceed the limits stated in Regulation 52(6) of SEBI (MF) Regulations. Thus, there shall be no internal sub-limits within the expense ratio for expense heads mentioned under Regulation 52 (2) and (4) respectively.

All scheme related expenses including commission paid to distributors, by whatever name it may be called and in whatever manner it may be paid, shall necessarily be paid from the Scheme only within the regulatory limits and not from the books of the AMC, its Associate, Sponsors, Trustee or any other entity through any route. However, expenses that are very small in value but high in volume^ (^A list of such miscellaneous expenses is provided by AMFI in consultation with SEBI) may be paid out of AMC's books at actuals or not exceeding 2 bps of the Scheme's AUM, whichever is lower.

Expense Structure for Direct Plan - Direct Plan will have lower expense ratio than Regular Plan of the Scheme. The expenses under Direct Plan shall exclude the distribution and commission expenses and additional expenses for gross new flows from specified cities under Regulation 52(6A)(b). All fees and expenses charged in a direct plan (in percentage terms) under various heads including the investment and advisory fee shall not exceed the fees and expenses charged under such heads in a Regular Plan.

The trusteeship fees shall be subject to a maximum of 0.01% per annum of the daily Net Assets of the schemes of the Mutual Fund. Such fee shall be paid to the Trustee Company at monthly frequency. The Trustee Company may charge further expenses as permitted from time to time under the Trust Deed and SEBI (MF) Regulations.

GST on expenses other than the investment management and advisory fees, if any, shall be charged to the Scheme within the maximum limit of total expense ratio as prescribed under regulation 52 of the SEBI (MF) Regulations. GST on brokerage and transaction cost paid for execution of trade, if any, shall be within the limit prescribed under Regulation 52 of the SEBI (MF) Regulations.

In terms of Clause 10.1.16.(a) of SEBI Master circular, the AMC shall annually set apart at least 0.02% on daily net assets within the maximum limit of recurring expenses as per Regulation 52 for investor education and awareness initiatives.

The total expenses of the Scheme including the investment management and advisory fee shall not exceed the limits stated in Regulation 52(6) which are as follows:

- (i) On the first Rs.500 crores of the daily net assets 2.00%;
- (ii) On the next Rs.250 crores of the daily net assets -1.75%;
- (iii) On the next Rs. 1,250 crores of the daily net assets 1.50%;
- (iv) On the next Rs. 3,000 crores of the daily net assets 1.35%;
- (v) On the next Rs. 5,000 crores of the daily net assets 1.25%;
- (vi) On the next Rs. 40,000 crores of the daily net assets TER reduction of 0.05% for every increase of Rs. 5,000 crores of daily net assets or part thereof.
- (vii) On balance of the assets -0.80%

In addition to the limits specified in Regulation 52(6), the following costs or expenses may be charged to the Scheme as per Regulation 52 (6A), namely-

(a) Brokerage and Transaction costs incurred for the execution of trades shall be charged upto 0.12 per cent of the value of trades in case of cash market transactions and 0.05 per cent of the value of trades in case of derivatives transactions.

- (b) Expenses not exceeding of 0.30 per cent of daily net assets, if the new inflows from retail investors of such cities as specified by SEBI/AMFI from time to time are at least
  - (i) 30 per cent of gross new inflows from retail investors in the Scheme, or;
  - (ii) 15 per cent of the average assets under management (year to date) of the Scheme, whichever is higher:

Provided that if inflows from retail investors from such cities is less than the higher of sub-clause (i) or sub- clause (ii), such expenses on daily net assets of the Scheme shall be charged on proportionate basis:

Provided further that expenses charged under this clause shall be utilised for distribution expenses incurred for bringing inflows from retail investors from such cities.

Provided further that amount incurred as expense on account of inflows from retail investors of such cities shall be credited back to the Scheme in case the said inflows are redeemed within a period of one year from the date of investment;

For the purpose of this clause - inflows of amount upto Rs. 2 Lacs per transaction, by individual investors shall be considered as inflow from "retail investor".

Note: In line with AMFI communication no.35P/MEM-COR/85-a/2022-23 dated March 2, 2023 and SEBI letter no. SEBI/H0/IMD/IMD-SEC-3/P/OW/2023/5823/1 dated February 24, 2023, the B-30 incentive structure is kept in abeyance from March 1, 2023, till appropriate re-instatement of incentive structure by SEBI with necessary safeguards.

Further, GST on investment management and advisory fees shall be charged to the Scheme, in addition to the above expenses, as prescribed under the SEBI (MF) Regulations.

The total expense ratios of the schemes of the Fund are available in downloadable spreadsheet format on the AMC website and AMFI website. Any change in the current expense ratios will be updated at least three working days prior to the effective date of the change. For the total expense ratio details of the Scheme, investors may visit <u>https://www.mahindramanulife.com/downloads#mandatory-disclosures</u> available on the website of the AMC viz. <u>www.mahindramanulife.com</u>, and AMFI's website viz., <u>www.amfiindia.com</u>.

Further, any change in the base TER (i.e. TER excluding additional expenses provided in Regulation 52 (6A) (b) and 52 (6A) (c) of SEBI (Mutual Funds) Regulations, 1996 and Goods & Services Tax on investment and advisory fees) in comparison to previous base TER charged to the Scheme/ Plan shall be communicated to investors of the Scheme/ Plan through notice via email or SMS and will be uploaded on the website <u>https://www.mahindramanulife.com/downloads#mandatory-disclosures</u> at least three working days prior to effective date of such change.

Provided that any increase or decrease in TER of the Scheme/Plan due to change in AUM and any decrease in TER in the Scheme/Plan due to various other regulatory requirements would not require issuance of any prior notice/communication to the investors.

#### <u>Illustration on impact of expense ratio</u>

Impact of expense ratio on scheme's returns						
Particulars	Regular Plan			Direct Plan		
	Amount (Rs)	NAV (Rs per unit)	Units	Amount (Rs)	NAV (Rs per unit)	Units
Investment as on March 31, 2024 (A)	100,000	10.0000	10,000	100,000	10.0000	10,000
Value of Investment as on March 31, 2025 before expenses on Gross basis (B)	109,250	10.9250	10,000	109,250	10.9250	10,000
Expenses @ 1.25% per annum other than distribution expenses charged to the scheme (C)	1,250	0.1250		1,250	0.1250	
Distribution expenses @ 0.75% per annum charged under Regular Plan (D)	750	0.0750		-	-	
Value of above investment as on March 31, 2025 (net of all expenses) (E) = (B-C- D)	107,250	10.7250	10,000	108,000	10.8000	10,000
Gross return before charging any expenses ((B-A) /A)%	9.25%			9.25%		
Net return under each plan earned by the Investor ((E-A) $/$ A)%	7.25%			8.00%		

## <u>Notes</u>

- a. The above computation assumes no investment/redemption made during the year. The investment is assumed to be made in the Growth option of the scheme.
- b. The above computation is simply to illustrate the impact of expenses of the schemes. The actual expenses charged to the schemes will not be more than the amount that can be charged to the scheme as mentioned in this SID.
- c. It is assumed that expenses charged are evenly distributed throughout the year. Tax impact on customers has not been considered due to the individual nature of this impact.
- **d.** The expenses of the Direct Plan under the Scheme may vary with that of the Regular Plan under the Scheme.
- e. Calculations are based on assumed NAVs and expenses. Actual returns may differ from those considered above.

#### **D. LOAD STRUCTURE**

Exit Load is an amount which is paid by the investor to subscribe to the units or to redeem the units from the Scheme. Load amounts are variable and are subject to change from time to time. For the current applicable structure, please refer to the website of the AMC (<u>www.mahindramanulife.com</u>) or may call at *1800-419-6244* or your distributor.

Type of Load#	Load chargeable# (as %age of NAV)
Exit Load #	Nil

# Applicable for normal subscriptions / redemptions including transactions under special products such as SIP, STP, SWP, switches, etc. offered by the AMC.

There shall be no exit load levied in case of switch of investments i) between the Plans (i.e. Regular and Direct Plans); and/or ii) between the options (i.e. IDCW and Growth options), within the Scheme/Plan.

There shall be no load on issue of units allotted on reinvestment of IDCW for existing as well as prospective investors.

GST on exit load, if any, shall be paid out of the exit load proceeds. The entire exit load (net of GST), charged, if any, shall be credited to the Scheme.

The AMC/Trustee reserves the right to change / modify the Load structure of the Scheme, subject to maximum limits as prescribed under the Regulations. However, the Redemption/Repurchase Price will not be lower than 95% of the NAV or as permitted / prescribed under the SEBI Regulations from time to time.

Any imposition or enhancement of Load in future shall be applicable on prospective investments only. At the time of changing the Load Structure:

- 1. An Addendum detailing the changes will be attached to Scheme Information Document (s) and Key Information Memorandum. The addendum may be circulated to all the distributors / brokers so that the same can be attached to all Scheme Information Documents and Key Information Memoranda already in stock.
- 2. The addendum will be displayed on the website of the AMC and arrangements will be made to display the addendum in the form of a notice in all the Investor Service Centres and distributors / brokers office.
- 3. The introduction of the Exit Load along with the details may be stamped in the acknowledgement slip issued to the investors on submission of the application form and may also be disclosed in the statement of accounts issued after the introduction of such Load.
- 4. A public notice shall be given in respect of such changes in one English daily newspaper having nationwide circulation as well as in a newspaper published in the language of region where the Head Office of the Mutual Fund is situated.
- 5. Any other measure which the Mutual Fund may consider necessary.

The investors / unitholders are requested to check the prevailing load structure of the Scheme before investing. For the current applicable exit load structure, please refer to the website of the AMC (www.mahindramanulife.com) or may call at 1800-419-6244 (toll free no.) or your distributor.

## **SECTION II**

## I. INTRODUCTION

## A. DEFINITIONS

For details refer <u>https://www.mahindramanulife.com/downloads#MANDATORY-</u> <u>DISCLOSURES-+-Offer-Document-Related-Disclosures</u>

## **B. RISK FACTORS**

## i. STANDARD RISK FACTORS

- Investment in Mutual Fund Units involves investment risks such as trading volumes, settlement risk, liquidity risk, default risk including the possible loss of principal.
- As the price / value / interest rates of the securities in which the Scheme invests fluctuates, the value of your investment in the Scheme may go up or down.
- Past performance of the Sponsors/AMC/Mutual Fund does not guarantee future performance of the Scheme.
- The name of the Scheme does not in any manner indicate either the quality of the Scheme or its future prospects and returns.
- The Sponsors is not responsible or liable for any loss resulting from the operation of the Scheme beyond the initial contribution of Rs. 1 lakh made by it towards setting up the Fund.
- The present scheme is not a guaranteed or assured return scheme.

## ii. SCHEME SPECIFIC RISK FACTORS

Some of the specific risk factors related to the Scheme include, but are not limited to the following:

## Risks associated with investments in Fixed Income Securities

- Interest-Rate Risk: Fixed income securities such as government bonds, corporate bonds, and money market instruments and fixed income derivatives run price-risk or interest-rate risk. Generally, when interest rates rise, prices of existing fixed income securities fall and when interest rates drop, such prices increase. The extent of fall or rise in the prices depends upon the coupon and maturity of the security. It also depends upon the yield level at which the security is being traded.
- **Re-investment Risk:** Investments in fixed income securities carry re-investment risk as interest rates prevailing on the coupon payment or maturity dates may differ from the original coupon of the bond.
- **Basis Risk**: Basis risk arises due to an identifical difference in the price movement of the derivative vis-à-vis that of the security being hedged.
- **Spread Risk:** In a floating rate security the coupon is expressed in terms of a spread or mark up over the benchmark rate. In the life of the security this spread may move adversely leading to loss in value of the portfolio. The yield of the underlying benchmark might not change, but the spread of the security over the underlying benchmark might increase leading to loss in value of the security.
- Liquidity Risk: The liquidity of a bond may change, depending on market conditions leading to changes in the liquidity premium attached to the price of the bond. At the time of selling the security, the security can become less liquid, leading to loss in value of the portfolio.
- **Credit Risk:** This is the risk associated with the issuer of a debenture/bond or a money market instrument defaulting on coupon payments or in paying back the principal amount on maturity. Even when there is no default, the price of a security may change with expected changes in the credit rating of the issuer. It is to be noted here that a Government Security is a sovereign security and is the safest. Corporate bonds carry a higher amount of credit risk than Government securities.

- Liquidity Risk on account of unlisted securities: The liquidity and valuation of the Scheme investments due to their holdings of unlisted securities may be affected if they are required to be sold prior to their target date of divestment. The unlisted security can go down in value before the divestment date and selling of these securities before the divestment date can lead to losses in the portfolio.
- **Counterparty Risk:** This is the risk of failure of counterparty to a transaction to deliver securities against consideration received or to pay consideration against securities delivered, in full or in part or as per the agreed specification. There could be losses to the Scheme in case of a counterparty default.
- Settlement Risk: Fixed income securities run the risk of settlement which can adversely affect the ability of the fund house to swiftly execute trading strategies which can lead to adverse movements in NAV.
- **Risks associated with unrated instruments:** Investments in unrated instruments are subject to the risk associated with investments in any other fixed income securities, as referred above. However, investments in unrated instruments are considered to be subject to greater risk of loss of principal and interest than rated instruments.
- **Duration Risk**: Duration risk refers to the movement in price of the underlying invested money market / debt instruments due to movement/change in interest rates over different durations of maturity of instruments. In a portfolio of debt assets, the duration risk is measured by the average duration of the portfolio. Duration, expressed in years, is used as a measure of the sensitivity of the fixed income instrument to a change in interest rates. Usually Individual duration of the fixed average of such individual instrument duration. A longer portfolio duration is associated with greater price fluctuations. A rise in interest rates could normally lead to decrease in prices and generally negatively affects portfolios having longer duration vis-a-vis portfolios having shorter duration. A fall in interest rate generally benefits portfolio having longer duration. A longer duration portfolio is also generally associated with greater volatility vis-a-vis a shorter duration portfolio.
- **Performance Risk** Performance risk refers to the risk of a scheme being unable to generate returns matching / above the returns of the scheme's benchmark. It would also mean the scheme underperforming against its peer set of other mutual fund schemes having similar portfolios, scheme classification, objective, benchmark and asset allocation. The performance risk is a function of various variables which include interest rate movement and the associated price movement of the invested debt/money market instruments, the duration risk, the credit quality movement and the liquidity of the invested instruments. These risks could arise due to a variety of market and economic activities, government policies, global economic changes, currency fluctuations, tax policies, political changes, corporate actions and investors' behaviour.

#### **Risks associated with Structured Obligations/ Credit Enhancements**

#### **Counterparty Risk**

This is the risk of failure of counterparty to a transaction to deliver securities against consideration received or to pay consideration against securities delivered, in full or in part or as per the agreed specification. Counterparty risk also includes (not limited to) non-performance of the servicer, the designated bank, swap counterparties, guarantor, etc. There could be losses to the Scheme in case of a counterparty default.

**Counterparty risk associated with credit enhancement**: Credit enhancement can be provided by guarantee or cash collateral. For instance, in case of guarantee, the investors are exposed to the credit quality risk of corporate entity providing the guarantee. Similarly, if the cash collateral is the fixed deposit of a financial institution, the investor is exposed to the credit risk associated with that financial institution.

#### Credit Risk

This is the risk associated with the issuer, defaulting on coupon payments or in paying back the principal amount on maturity. The price of a security may change with expected changes in the credit rating of the issuer.

#### Market Risk

Market Risk arises on account of factors external to structured transactions. Prepayment of loans, movement in interest rates, and other macro-economic factors are type of market risk. Market risk may also arise because of a possible impairment in the market value of the underlying collateral/security.

#### Legal Risk

Legal risk may arise in a situation where if the underlying borrower or guarantor goes bankrupt, there is a possibility that the bankruptcy court may attach the receivables/security, and may decide that the cash flows should not be specifically earmarked to the investors in the structured transaction.

#### **Collateral Risk**

Collateral in form of equity shares have an embedded risk of sharp price volatility which may potentially lead to erosion in value of collateral affecting the ability of the fund to recover capital and interest obligations. Further underlying liquidity of the equity shares may vary leading to a lower recovery and a higher impact cost of liquidation. Also there is a possibility of guarantor going insolvent which also can impact the recovery value of exposure. In case of other assets provided recovery value and enforce ability of asset can also be a risk factor which can lower the recovery value.

## Risks associated with investments in Securitized Debt

The Scheme may invest in domestic securitized debt such as Asset Backed Securities (ABS) or Mortgage Backed Securities (MBS). ABS are securitized debts where the underlying assets are receivables arising from various loans including automobile loans, personal loans, loans against consumer durables, etc. MBS are securitized debts where the underlying assets are receivables arising from loans backed by mortgage of residential / commercial properties.

At present in Indian market, following types of loans are securitized:

- 1. Auto Loans (cars / commercial vehicles /two wheelers)
- 2. Residential Mortgages or Housing Loans
- 3. Consumer Durable Loans
- 4. Personal Loans
- 5. Corporate Loans

In terms of specific risks attached to securitization, each asset class would have different underlying risks. Residential Mortgages generally have lower default rates than other asset classes, but repossession becomes difficult. On the other hand, repossession and subsequent recovery of commercial vehicles and other auto assets is fairly easier and better compared to mortgages. Asset classes like personal loans, credit card receivables are unsecured and in an economic downturn may witness higher default. A corporate loan/receivable, depend upon the nature of the underlying security for the loan or the nature of the receivable and the risks correspondingly fluctuate.

The rating agencies define margins, over collateralization and guarantees to bring risk in line with similar AAA rated securities. The factors typically analyzed for any pool are as follows:

a. Assets securitized and Size of the loan: This indicates the kind of assets financed with the loan and the average ticket size of the loan. A very low ticket size might mean more costs in originating and servicing of the assets.

- b. Diversification: Diversification across geographical boundaries and ticket sizes might result in lower delinquency.
- c. Loan to Value Ratio: Indicates how much % value of the asset is financed by borrower's own equity. The lower this value the better it is. This suggests that where the borrowers own contribution of the asset cost is high; the chances of default are lower.
- d. Average seasoning of the pool: This indicates whether borrowers have already displayed repayment discipline. The higher the number, the more superior it is. The other main risks pertaining to Securitized debt are as follows:
  - **Prepayment Risk**: This arises when the borrower pays off the loan sooner than expected. When interest rates decline, borrowers tend to pay off high interest loans with money borrowed at a lower interest rate, which shortens the average maturity of ABSs. However, there is some prepayment risk even if interest rates rise, such as when an owner pays off a mortgage when the house is sold or an auto loan is paid off when the car is sold.
  - **Reinvestment Risk:** Since prepayment risk increases when interest rates decline, this also introduces reinvestment risk, which is the risk that the principal can only be reinvested at a lower rate.

# Risks associated with Real Estate Investment Trust (REIT) and Infrastructure Investment Trust (InvIT)

- 1. **Risk of lower than expected distributions**: The distributions by the REIT or InvIT will be based on the net cash flows available for distribution. The amount of cash available for distribution principally depends upon the amount of cash that the REIT/InvIT receives as dividends or the interest and principal payments from portfolio assets. The cash flows generated by portfolio assets from operations may fluctuate based on, among other things:
  - success and economic viability of tenants and off-takers
  - economic cycles and risks inherent in the business which may negatively impact
  - valuations, returns and profitability of portfolio assets
  - force majeure events related such as earthquakes, floods etc. rendering the portfolio assets inoperable
  - debt service requirements and other liabilities of the portfolio assets
  - fluctuations in the working capital needs of the portfolio assets
  - ability of portfolio assets to borrow funds and access capital markets
  - changes in applicable laws and regulations, which may restrict the payment of dividends by portfolio assets
  - amount and timing of capital expenditures on portfolio assets
  - insurance policies may not provide adequate protection against various risks associated with operations of the REITs/InvITs such as fire, natural disasters, accidents.
  - taxation and other regulatory factors
- 2. **Price-Risk**: The valuation of the REITs/InvITs units may fluctuate based on economic conditions, fluctuations in markets (eg. real estate) in which the REITs/InvITs operates and the resulting impact on the value of the portfolio of assets, regulatory changes, force majeure events etc. REITs & InvITs may have volatile cash flows. As an indirect shareholder of portfolio assets, unit holders rights are subordinated to the rights of creditors, debt holders and other parties specified under Indian law in the event of insolvency or liquidation of any of the portfolio assets.
- 3. **Interest-Rate Risk**: Generally, there would be inverse relationship between the interest rates and the price of units i.e. when interest rates rise, prices of units fall and when interest rates drop, such prices increase.

4. Liquidity Risk: This refers to the ease with which REITs/InvITs units can be sold. There is no assurance that an active secondary market will develop or be maintained. Hence there would be time when trading in the units could be infrequent. The subsequent valuation of illiquid units may reflect a discount from the market price of comparable securities for which a liquid market exists.

#### **Risks associated with investments in Derivatives**

- **Market Risk:** Derivatives are traded in the market and are exposed to losses due to change in the prices of the underlying and/or other assets and, change in market conditions and factors. The volatility in prices of the underlying may impact derivative instruments differently than its underlying.
- **Basis Risk:** This risk arises when the derivative instrument used to hedge the underlying asset does not match the movement of the underlying being hedged for example, when a bond is hedged using a derivative, the change in price of the bond and the change in price of the derivative may not be fully correlated leading to basis risk in the portfolio. The underlying benchmark of a floating rate security might become less active or may cease to exist and thus may not be able to capture the exact interest rate movements, leading to loss of value of the portfolio. Example: Where swaps are used to hedge an underlying fixed income security, basis risk could arise when the fixed income yield curve moves differently from that of the swap benchmark curve or if there is a mismatch in the tenor of the swap and the fixed income security.
- **Credit Risk:** The Credit Risk is the risk that the counter party will default in its obligations and is generally small as in a derivative transaction there is generally no exchange of the principal amount.
- Liquidity Risk: This risk arises from the inability to exit derivatives positions at prices that reflect the underlying assets/ rates/ indices, lack of availability of derivative products across different maturities and with various risk appetite.
- Valuation Risk: This is the risk of mis-pricing or improper valuation of derivatives due to inadequate trading data with good volumes.
- **Operational / Systemic Risk:** This is the risk arising due to failure of operational processes followed by the exchanges and Over The Counter (OTC) participants for the derivatives trading.
- **Counterparty Risk:** Counterparty risk is the risk that losses will be incurred due to the default by the counterparty for OTC derivatives.
- **Exposure Risk:** An exposure to derivatives in excess of the hedging requirements can lead to losses. An exposure to derivatives can also limit the profits from a plain investment transaction.
- **Interest Rate Risk:** This risk arises from the movement of interest rates in adverse direction. As with all the debt securities, changes in the interest rates will affect the valuation of the portfolios.

Derivative products are leveraged instruments and can provide disproportionate gains as well as disproportionate losses to the investor. Execution of such strategies depends upon the ability of the fund manager to identify such opportunities. Identification and execution of the strategies to be pursued by the fund manager involve uncertainty and decision of fund manager may not always be profitable. No assurance can be given that the fund manager will be able to identify or execute such strategies.

The risks associated with the use of derivatives are different from or possibly greater than, the risks associated with investing directly in securities and other traditional investments.

#### **Risk factors with respect to imperfect hedging**

**Basis Risk**: The risk arises when the price movements in derivative instrument used to hedge the underlying assets does not match the price movements of the underlying assets being hedged. Such difference may potentially amplify the gains or losses, thus adding risk to the position.

**Price Risk**: The risk of mispricing or improper valuation and the inability of derivatives to correlate perfectly with underlying assets, rates and indices.

**Risk of mismatch between the instruments**: The risk arises if there is a mismatch between the price movements in derivative instrument used to hedge, compared to the price movement of the underlying assets being hedged. For example, when IRF which has government security as underlying is used, to hedge a portfolio that contains corporate debt securities.

**Correlation weakening and consequent risk of regulatory breach:** SEBI Regulations mandates minimum correlation criterion of 0.9 (calculated on a 90-day basis) between the portfolio being hedged and the derivative instrument used for hedging. In cases where the correlation falls below 0.9, a rebalancing period of 5 working days has been permitted. Inability to satisfy this requirement to restore the correlation level to the stipulated level, within the stipulated period, due to difficulties in rebalancing would lead to a lapse of the exemption in gross exposure computation. The entire derivative exposure would then need to be included in gross exposure, which may result in gross exposure in excess of 100% of net asset value.

#### **Risk factors associated with repo transactions in Corporate Debt Securities:**

**Counterparty Risk:** This refers to the inability of the seller to meet the obligation to buy back securities at the contracted price. Fund Manager will endeavor to manage counterparty risk by dealing only with counterparties having strong credit profiles assessed through in-house credit analysis and / or with regulated entities. In the event of default by the repo counterparty, the Scheme will have recourse to the corporate debt securities given as collateral to recover the investment by selling the collateral in the market. However, selling of collateral will also be subject to liquidity risk in the market and the Scheme may incur impact cost at the time of selling the collateral.

**Collateral Risk:** Collateral risk arises when the market value of the securities is inadequate to meet the repo obligations or there is downward migration in rating of collateral. Further if the rating of collateral goes below the minimum required rating during the term of repo or collateral becomes ineligible for any reason, counterparty will be expected to substitute the collateral. In case of failure to do so, the AMC / Scheme will explore the option for early termination of the trade.

## Risks associated with 'Right to limit redemptions'

Subject to the approval of Board of Directors of the AMC and Trustee Company and immediate intimation to SEBI, a restriction on redemptions may be imposed by the Scheme under certain exceptional circumstances, which the AMC / Trustee believe that may lead to a systemic crisis or event that constrict liquidity of most securities or the efficient functioning of markets. Please refer to the paragraph "Right to Limit Redemptions" for further details including the procedure to be followed while imposing restriction on redemptions.

## Risks associated with investing in Tri-party Repo (TREPS) through CCIL

The Mutual Fund is a member of securities segment and Tri-party Repo trade settlement of the Clearing Corporation of India Limited (CCIL). All transactions of the Mutual Fund in government
securities and in Tri-party Repo trades are settled centrally through the infrastructure and settlement systems provided by CCIL; thus reducing the settlement and counterparty risks considerably for transactions in the said segments. The members are required to contribute an amount as communicated by CCIL from time to time to the default fund maintained by CCIL as a part of the default waterfall (a loss mitigating measure of CCIL in case of default by any member in settling transactions routed through CCIL). CCIL shall maintain two separate Default Funds in respect of its Securities Segment, one with a view to meet losses arising out of any default by its members from outright and repo trades and the other for meeting losses arising out of any default by its members from Triparty Repo trades. The Mutual Fund is exposed to the extent of its contribution to the default fund of CCIL at any given point in time i.e. in the event that the default waterfall is triggered and the contribution of the Mutual Fund is called upon to absorb settlement/default losses of another member by CCIL, the Scheme may lose an amount equivalent to its contribution to the default fund.

Further, it may be noted that, CCIL periodically prescribes a list of securities eligible for contributions as collateral by members. Presently, all Central Government securities and Treasury bills are accepted as collateral by CCIL. The risk factors may undergo change in case the CCIL notifies securities other than Government of India securities as eligible for contribution as collateral.

#### **Risks associated with segregated portfolio**

The unitholders may note that no redemption and subscription shall be allowed in segregated portfolio. However, in order to facilitate exit to unitholders in segregated portfolio, the AMC shall enable listing of units of segregated portfolio on the recognized stock exchange. The risks associated in regard to the segregated portfolio are as follows:

- The investors holding units of the segregated portfolio may not be able to liquidate their holdings till the time of recovery of money from the issuer.
- The security comprising the segregated portfolio may not realize any value
- Listing of units of the segregated portfolio on a recognized stock exchange does not necessarily guarantee their liquidity. There may not be active trading of units of the segregated portfolio on the stock exchange.

The trading price of units on the stock exchange may be significantly lower than the prevailing Net Assets Value (NAV) of the segregated portfolio

### **Risks Factors associated with transaction in Units through stock exchange(s)**

In respect of transaction in Units of the Scheme through BSE and / or NSE, allotment and redemption of Units on any Business Day will depend upon the order processing / settlement by BSE and / or NSE and their respective clearing corporations on which the Fund has no control. Further, there is no guarantee about sufficient liquidity of units of the Scheme on stock exchange platforms(s).

### **Backstop facility in form of investment in CDMDF:**

CDMDF is set up as a scheme of the Trust registered as an Alternative Investment Fund ('AIF') in accordance with the SEBI (Alternative Investment Funds) Regulations, 2012 ("AIF Regulations"). The objective of the CDMDF is to help to develop the corporate debt market by providing backstop facility to instill confidence amongst the market participants in the corporate debt/bond market during times of market dislocation and to enhance the secondary market liquidity. In times of market dislocation, CDMDF shall purchase and hold eligible corporate debt securities from the participating investors (i.e., specified debt-oriented MF schemes to begin with) and sell as markets recover. The CDMDF will thus act as a key enabler for facilitating liquidity in the corporate debt market and to respond quickly in times of market dislocation. The trigger and period for which the backstop facility

will be open shall be as decided by SEBI. Thus, this backstop facility will help Fund Manager(s) of the Scheme to better generate liquidity during market dislocation to help the Scheme fulfill liquidity obligations under stress situation.

In accordance with the requirement of regulation 43A of SEBI (Mutual Funds) Regulations, 1996 read with Chapter 16A on 'Investment by Mutual Fund Schemes and AMCs in units of Corporate Debt Market Development Fund' of SEBI Master Circular, the Scheme shall invest 25 bps of its AUM as on December 31, 2022, in the units of the Corporate Debt Market Development Fund ('CDMDF'). An incremental contribution to CDMDF shall be made every six months to ensure 25 bps of the Scheme's AUM is invested in units of CDMDF. However, if AUM decreases, there shall be no return or redemption from CDMDF. Contribution made to CDMDF, including the appreciations on the same, if any, shall be locked-in till winding up of the CDMDF.

Investors are requested to read the detailed disclosure on investment of the Scheme in the CDMDF as listed in point "A. Where will the Scheme Invest" under sub-section "II - Information about the scheme" in Section II.

# C. RISK MITIGATION STRATEGIES

Risk is an inherent part of the investment function. The AMC has incorporated adequate safeguards to manage risk in the fund management process. The risk control process involves identifying & measuring the risk through various Risk Measurement Tools.

The Scheme would invest in a diversified portfolio of equity and equity related securities which would help alleviate the credit, sector/market capitalization related concentration risk.

Nature of Risk	Risk mitigation measures	
Risks associated with Debt Securities and Money Market Securities		
Market Risk / Interest Rate Risk	In expectation of a rising interest rate scenario, the Scheme may increase its investment in money market securities whereas if the interest rates are expected to fall the allocation to debt securities with longer maturity may be increased thereby mitigating risk to that extent. The funds' duration could be actively managed, taking into account the investment strategy, applicable regulations, scheme objectives, and prevailing market and interest rate conditions.	
Liquidity Risk	Liquidity Risk shall be addressed by monitoring the asset side secondary market liquidity in conjunction with the concentration and the profile of the liability side on timely basis. The liquidity risk will be managed and/or sought to be addressed by creating a portfolio which has adequate access to liquidity in the secondary market. The portfolio construction and management shall be executed in line with the Regulatory and internal guidelines for liquidity risk management. Creating portfolios that are diversified across maturities, ratings, types of assets, etc. in accordance with the fund objectives, regulations, and investing strategy could be a way to decrease liquidity risk.	
Credit Risk	In addition to external ratings by the accredited credit rating agencies, the credit analyst will undertake independent credit assessment that would capture the quantitative (financial statements) and qualitative aspects (accounting policies, management quality, off-balance sheet exposures, notes, auditors' comments, disclosure standards etc.) of a company to assess its fundamental credit strength and guide the investment decisions in the schemes. There is also a regulatory cap	

	based on issuer ratings on exposure to each issuer to ensure a	
	diversified portfolio and reduced credit risk in the portfolio. Further,	
	there are firm wide issuer limits to keep credit risk under control	
	through diversification.	
Re-investment Risk	Reinvestment risk on intermittent cashflows received by the Scheme	
	manifests during a falling interest rate scenario. While the Scheme	
	would be subjected to reinvestment risk, it is also expected to benefit	
	from the capital appreciation in fixed income instruments driven by	
	falling interest rates. Reinvestment risk and interest rate risk for fixed	
	income securities mitigate each other.	
	<b>Risks associated with REITs/ InvITs</b>	
Price Risk	The maximum exposure to units of REITs and InvITs is capped	
	in accordance with the regulatory limit. Further, there is also an	
	issuer based limit.	
Liquidity Risk	Regular monitoring of the REITs and InvITs liquidity/ trading	
	volume & changes in market conditions/ regulatory changes may	
	help mitigate this risk.	
InterestRate Risk	Regular monitoring and evaluating the portfolio structure with	
	respect to changing interest rate scenario.	
Risks associated with Fixed Income Derivatives		
The Scheme may invest	t in derivative for the nurnose of hedging, portfolio halancing and other	

The Scheme may invest in derivative for the purpose of hedging, portfolio balancing and other purposes as may be permitted under the Regulations.

Derivatives will be used in the form of instruments as may be permitted by regulations.

Exposure with respect to derivatives shall be in line with regulatory limits and the limits specified in the SID and such exposure shall be monitored on timely basis.

### **II. INFORMATION ABOUT THE SCHEME:**

### A. WHERE WILL THE SCHEME INVEST?

Subject to the Regulations, the corpus of the Scheme can be invested in any (but not exclusively) of the following securities as permitted by SEBI/ RBI from time to time:

- 1. Debt and Money market Instruments
- i. Certificate of Deposits (CD) CD is a negotiable money market instrument issued by scheduled commercial banks and select all-India Financial Institutions that have been permitted by the RBI to raise short term resources. The maturity period of CDs issued by the Banks is between 7 days to one year, whereas, in case of FIs, maturity is between one year to 3 years from the date of issue. CDs may be issued at a discount to face value.
- ii. Commercial Paper (CP) CP is an unsecured negotiable money market instrument issued in the form of a promissory note, generally issued by the corporates, primary dealers and all India Financial Institutions as an alternative source of short term borrowings. They are issued at a discount to the face value as may be determined by the issuer. CP is traded in secondary market and can be freely bought and sold before maturity.
- iii. Bills Rediscounting (BRD) BRD is the rediscounting of trade bills which have already been purchased by / discounted with the bank by the customers. These trade bills arise out of supply of goods / services.
- iv. Securities issued by the Central and State Governments as may be permitted by RBI, securities guaranteed by the Central and State Governments (including but not limited to coupon bearing bonds,

zero coupon bonds and treasury bills). Central Government securities are sovereign debt obligations of the Government of India with zero-risk of default and issued on its behalf by RBI. They form part of Government's annual borrowing programme and are used to fund the fiscal deficit along with other short term and long term requirements. Such securities could be fixed rate, fixed interest rate with put/call option, zero coupon bond, floating rate bonds, capital indexed bonds, fixed interest security with staggered maturity payment etc. State Government securities are issued by the respective State Government in co-ordination with the RBI.

- v. Treasury Bills (T-Bills) are issued by the Government of India to meet their short term borrowing requirements. T-Bills are issued for maturities of 91 days, 182 days and 364 days. T-bills are issued at a discount to their face value and redeemed at par.
- vi. Repos/reverse repos in Government Securities as may be permitted by RBI (including but not limited to coupon bearing bonds, zero coupon bonds and treasury bills). Repo (Repurchase Agreement) or Reverse Repo is a transaction in which two parties agree to sell and purchase the same security with an agreement to purchase or sell the same security at a mutually decided future date and price.
- vii. Repos/reverse repo transactions in Corporate Debt securities The Scheme may undertake repo / reverse repo transactions in corporate debt securities by ensuring compliance with clause 12.18 of SEBI Master Circular and such other directions as issued by RBI and SEBI from time to time.
- viii. Triparty Repo (TREPS) "Triparty repo" means a repo contract where a third entity (apart from the borrower and lender), called a Tri- Party Agent, acts as an intermediary between the two parties to the repo to facilitate services like collateral selection, payment and settlement, custody and management during the life of the transaction. TREPS facilitates, borrowing and lending of funds, in Triparty Repo arrangement.
- ix. Debt securities of domestic Government agencies and statutory bodies, which may or may not carry a Central/State Government guarantee These are instruments which are issued by various government agencies and bodies. They can be issued at discount, par or premium.
- x. Corporate debt and securities (of both public and private sector undertakings) including Bonds, Debentures, Notes, Strips etc. These are instruments issued by corporate entities for their business requirements. They are generally rated by credit rating agencies, higher the rating lower the risk of default.
- xi. Money market instruments permitted by SEBI/RBI, including TREPS (Tri-Party Repo) market or in alternative investment for the TREPS market as may be provided by the RBI to meet the short term liquidity requirements. The non-convertible part of convertible securities Convertible securities are securities which can be converted from Debt to Equity shares. The non-convertible part cannot be converted into Equity shares and work like a normal debt instrument.
- xii. Investment in Structured Obligations (such as corporate / promoter guarantee, conditional and contingent liabilities, covenants, pledge and / or Non Disposal Undertaking of shares etc) Structured Obligations carry a layer of credit enhancement as compared to the conventional bond issuances. This credit enhancement supports the payment of interest and principal on the instrument and such enhancement may be internal or external. Enhancement can be in the form of, but not limited to, equity shares as collateral, full or partial corporate guarantee, escrowing revenue account, etc.
- xiii.Securitised Debt Instruments Securitization is a structured finance process which involves pooling and repackaging of cash-flow producing financial assets into securities that are then sold to investors. They are termed as Asset Backed Securities (ABS) or Mortgage Backed Securities (MBS). ABS are backed by other assets such as credit card, automobile or consumer loan receivables, retail installment loans or participations in pools of leases. MBS is an asset backed security whose cash flows are backed by the principal and interest payments of a set of mortgage loans. Such Mortgage could be either residential or commercial properties.
- xiv. Pass through, Pay through or other Participation Certificates, representing interest in a pool assets including receivables. It represents beneficial interest in an underlying pool of cash flows. These cash flows represent dues against single or multiple loans originated by the sellers of these loans.

The following are certain additional disclosures w.r.t. investment in securitized debt:

## i. How the risk profile of securitized debt fits into the risk appetite of the scheme

Securitized debt is a form of conversion of normally non-tradable loans to transferable securities. This is done by assigning the loans to a special purpose vehicle (a trust), which in turn issues Pass-Through-Certificates (PTCs). These PTCs are transferable securities with fixed income characteristics. The risk of investing in securitized debt is similar to investing in debt securities. However it differs in two respects.

- a) Typically the liquidity of securitized debt is less than similar debt securities.
- b) For certain types of securitized debt (backed by mortgages, personal loans, credit card debt, etc.), there is an additional pre-payment risk. Pre-payment risk refers to the possibility that loans are repaid before they are due, which may reduce returns if the re-investment rates are lower than initially envisaged.

Because of these additional risks, securitized debt typically offers higher yields than debt securities of similar credit rating and maturity. If the fund manager judges that the additional risks are suitably compensated by the higher returns, he may invest in securitized debt up to the limits specified in the asset allocation table above.

# ii. Policy relating to originators based on nature of originator, track record, NPAs, losses in earlier securitized debt, etc

The originator is the person who has initially given the loan. The originator is also usually responsible for servicing the loan (i.e. collecting the interest and principal payments). An analysis of the originator is especially important in case of retail loans as this affects the credit quality and servicing of the PTC. The key risk is that of the underlying assets and not of the originator. For example, losses or performance of earlier issuances does not indicate quality of current series. However such past performance may be used as a guide to evaluate the loan standards, servicing capability and performance of the originator.

Originators may be: Banks, Non Banking Finance Companies, Housing Finance Companies, etc. The fund manager / credit analyst evaluates originators based on the following parameters

- Track record.
- Willingness to pay, through credit enhancement facilities etc.
- Ability to pay.
- Business risk assessment, wherein following factors are considered:
  - Outlook for the economy (domestic and global).
  - Outlook for the industry.
  - Company specific factors.

In addition a detailed review and assessment of rating rationale is done including interactions with the originator as well as the credit rating agency.

The following additional evaluation parameters are used as applicable for the originator / underlying issuer for pool loan and single loan securitization transactions:

- Transaction structure including Par versus premium and credit enhancement
- Reputation of Originator in the market
- Proportion of overdue assets of the pool or the underlying loan, as the case may be
- Track record of servicing of the pool or the loan, as the case may be
- Any disputes or litigations in the originated pools
- Credit quality and rating
- Loan to Value ratio
- Liquidity facility

### iii. Risk mitigation strategies for investments with each kind of originator

Risk would be mitigated to a large extent by the critical evaluation parameters mentioned above. Further, Risk mitigation strategies typically include additional credit enhancement, overcollateralization, interest subvention, presence of subordinate tranches, analysing ageing of the pools i.e. how long the loan has been with Originator before securitization etc.

Some of the risks with securitized debt investments and the corresponding risk mitigating strategies are listed below:

## **Risk mitigation strategy**

#### Limited Recourse, Delinquency and Credit Risk

In addition to careful scrutiny of credit profile of borrower/pool additional security in the form of adequate cash collaterals and other securities may be obtained to ensure that they all qualify for similar rating.

### **Bankruptcy of the Originator or Seller**

Normally, specific care is taken in structuring the securitization transaction so as to minimize the risk of the sale from the Originator not being construed as a 'true sale'. It is also in the interest of the originator to demonstrate the transaction as a true sale to get the necessary revenue recognition and tax benefits.

### Liquidity and Price risk

Securitized debt instruments are relatively illiquid in the secondary market and hence they are generally held to maturity. The liquidity risk and HTM (Held To Maturity) nature is taken into consideration at the time of analyzing the appropriateness of the securitization.

### **Prepayment Risk**

A certain amount of prepayments is assumed in the calculations at the time of purchase based on historical trends and estimates. Further, a stress case estimate is calculated and additional margins are built in.

# iv. The level of diversification with respect to the underlying assets, and risk mitigation measures for less diversified investments

In case of securitization involving single loans or a small pool of loans, the credit risk of the borrower is analyzed. In case of diversified pools of loans, the overall characteristic of the loans is analyzed to determine the credit risk.

The credit analyst looks at ageing (i.e. how long the loan has been with the originator before securitization) as one way of judging the performance potential of the PTC. Additional risk mitigants may include interest subvention, over collateralization, presence of an equity / subordinate tranche and / or guarantees. The credit analyst also uses analyses by credit rating agencies on the risk profile of the securitized debt.

Currently, the following parameters are used while evaluating investment decision relating to a pool securitization transaction. The Investment Committee may revise the parameters from time to time.

Characteristics /Type of Pool	Mort gage Loan	Comme rcial Vehicle and Constr uction Equip ment	CAR	Two wheelers	Micro Finance Pools	Personal Loans	Single Sell Downs	Others
Approximate Average maturity (in Months)	Up to 10 years	Up to 5 years	Up to 5 years	Up to 3 years	Up to 80 Weeks	Up to 3 Years	Refer Note 1	Refer Note 2
Collateral Margin (including Cash, guarantees, excess Interest spread, subordinate tranche)	>5%	>5%	>4%	>4%	>4%	>4%		
Average Loan To Value Ratio	<90%	<90%	<90%	<90%	Unsecure d	Unsecure d	"	"
Average seasoning of the Pool	>3 mont hs	>3 months	>3 months	>3 months	>3 months	>3 months	"	"
Maximum Single exposure range	<5%	<7%	Retail	Retail	Retail	Retail	"	"
Average Single exposure range %	<5%	<5%	Retail	Retail	Retail	Retail	"	"

Note 1: In case of securitization involving single loans or a small pool of loans, the credit risk of the borrower is analyzed. The investment limits applicable to the underlying borrower are applied to the single loan sell-down.

Note 2: Other investments will be decided on a case-to-case basis.

The credit analyst may consider the following risk mitigating measures in his analysis of the securitized debt:

- Size of the loan The size of the loan is generally analysed on a sample basis and an analysis of the static pool of the originator is undertaken to ensure that the same matched with static pool characteristics. It also indicates whether there is high reliance on very small ticket size borrower which could result in delayed and expensive recoveries.
- Average original maturity of the pool the analysis of the average maturity of the pool is undertaken to evaluate whether the tenor of the loans are generally in line with the average loan in the respective industry and repayment capacity of the borrower.
- Loan to value ratio, average seasoning of the pool of underlying assets these parameters will be evaluated based on the asset class as mentioned in the table above.
- Default rate distribution the credit team generally ensures that all the contracts in the pool are current to ensure zero default rate distribution.

- Geographical distribution the analysis of geographical distribution of the pool is undertaken to ensure prevention of concentration risk.
- Credit enhancement facility credit enhancement facilities in the form of cash collateral, such as fixed deposits, bank guarantee etc. could be obtained as a risk mitigation measure.
- Liquid facility these parameters will be evaluated based on asset class as mentioned in the table above.
- Structure of the pool of the underlying assets The structure of the pool of the underlying asset class or combination of various asset classes as mentioned in the table above. We could add new asset class depending upon the securitization structure and changes in market acceptability of asset classes.

### v. Minimum retention period of the debt by originator prior to securitization

Issuance of securitized debt is governed by the Reserve Bank of India. RBI norms cover the "true sale" criteria including credit enhancement and liquidity enhancements. In addition, RBI has proposed minimum holding period before they can be securitized. The minimum holding period depends on the tenor of the securitization transaction. The Fund will invest in securitized debts that are compliant with the laws and regulations.

### vi. Minimum retention percentage by originator of debts to be securitized

RBI has prescribed the minimum retention percentage as 5% or 10% of the book value of the loans being securitised depending on the original maturity of the loans and the features of the securitisation transaction.

# vii. The mechanism to tackle conflict of interest when the mutual fund invests in securitized debt of an originator and the originator in turn makes investments in that particular scheme of the fund

The key risk is securitized debt relates to the underlying borrowers and not the originator. In a securitization transaction, the originator is the seller of the debt(s) and the fund is the buyer. However, the originator is also usually responsible for servicing the loan (i.e. collecting the interest and principal payments). As the originators may also invest in the scheme, the fund manager shall ensure that the investment decision is based on parameters as set by the Investment Committee of the asset management company and committee shall review the same at regular interval.

# viii. The resources and mechanism of individual risk assessment with the AMC for monitoring investment in securitized debt

The fund management team has the required experience to analyse and monitor investments in securitised debts. On an on-going basis the rating movement of the securitised debts will be monitored. Credit research agencies also provide analysis of individual instruments and pools. The periodic reports received by the AMC on pool performance will be scanned to check for any change in asset quality and related impact on debt servicing and any impact that it can have on the credit ratings.

**Note:** The information contained herein is based on current market conditions and may change from time to time based on changes in such conditions, regulatory changes and other relevant factors. Accordingly, our investment strategy, risk mitigation measures and other information contained herein may change in response to the same.

xv. Debt Derivative instruments like Interest Rate Swaps, Forward Rate Agreements and such other derivative instruments permitted by SEBI/RBI.

**Interest Rate Swap** - An Interest Rate Swap ("IRS") is a financial contract between two parties exchanging or swapping a stream of interest payments for a "notional principal" amount on multiple occasions during a specified period. Such contracts generally involve exchange of a "fixed to floating" or "floating to fixed" rate of interest. Accordingly, on each payment date that occurs during the swap period, cash payments based on fixed/ floating and floating rates are made by the parties to one another.

**Forward Rate Agreement** - A Forward Rate Agreement ("FRA") is a financial contract between two parties to exchange interest payments for a notional principal amount on settlement date, for a specified period from start date to maturity date. Accordingly, on the settlement date, cash payments based on contract (fixed) and the settlement rate, are made by the parties to one another. The settlement rate is the agreed bench-mark/ reference rate prevailing on the settlement date.

### **Interest Rate Futures:**

A futures contract is a standardized, legally binding agreement to buy or sell a commodity or a financial instrument in a designated future month at a market determined price (the futures price) by the buyer and seller. The contracts are traded on a futures exchange. An Interest Rate Future is a futures contract with an interest bearing instrument as the underlying asset.

### Characteristics of Interest Rate Futures

- 1. Obligation to buy or sell a bond at a future date.
- 2. Standardized contract.
- 3. Exchange traded.
- 4. Physical/Cash settlement.
- 5. Daily mark to market.
- xvi. Investment in CDMDF- In accordance with the requirement of regulation 43A of SEBI (Mutual Funds) Regulations, 1996 read with Chapter 16A on 'Investment by Mutual Fund Schemes and AMCs in units of Corporate Debt Market Development Fund' of SEBI Master Circular', the Scheme shall invest 25 bps of its AUM.

## CDMDF Framework-

CDMDF shall comply with the Guarantee Scheme for Corporate Debt (GSCD) as notified by Ministry of Finance vide notification no. G.S.R. 559(E) dated July 26, 2023 and Chapter 16A on 'Investment by Mutual Fund Schemes and AMCs in units of Corporate Debt Market Development Fund' of SEBI Master Circular and circulars / guidelines/ Letters issued by SEBI and AMFI from time to time, which includes the framework for corporate debt market development fund. The framework will inclusive of following points-

- a) The CDMDF shall deal only in following securities during normal times:
  - Low duration Government Securities
  - Treasury bills
  - Tri-party Repo on G-sec
  - Guaranteed corporate bond repo with maturity not exceeding 7 days
- b) The fees and expenses of CDMDF shall be as follows:
  - During Normal times: (0.15% + tax) of the Portfolio Value charged on daily pro-rata basis.
  - During Market stress: (0.20% + tax) of the Portfolio Value charged on daily pro-rata basis.
  - "Portfolio Value" means the aggregate amount of portfolio of investments including cash balance without netting off of leverage undertaken by the CDMDF.

- c) Corporate debt securities to be bought by CDMDF during market dislocation include listed money market instruments. The long-term rating of issuers shall be considered for the money market instruments. However, if there is no long-term rating available for the same issuer, then based on credit rating mapping of Credit Rating Agencies between short term and long-term ratings, the most conservative long term rating shall be taken for a given short term rating. The securities purchased by CDMDF would be from secondary market, having investment grade credit rating and residual maturity not exceeding 5 years on the date of purchase. The utilization of such facility by the Scheme shall be voluntary.
- d) During market dislocation, CDMDF shall not buy any unlisted, below investment grade or defaulted debt securities or securities in respect of which there is a material possibility of default or adverse credit news or views.
- e) The sellers of debt securities shall be paid 90% of the consideration in cash and 10% in terms of units of CDMDF. Such units paid as consideration (different class of units than units allotted in lieu of contribution made) shall bear the risk of first loss, if any to CDMDF, and can be redeemed during the tenure of the Scheme, subject to certain conditions.
- f) CDMDF shall follow the Fair Pricing document, while purchase of corporate debt securities during market dislocation as specified in read with Chapter 16A on 'Investment by Mutual Fund Schemes and AMCs in units of Corporate Debt Market Development Fund' of SEBI Master Circular, and circulars / guidelines/ Letters issued by SEBI and AMFI from time to time.
- g) CDMDF shall follow the loss waterfall accounting and guidelines w.r.t. purchase allocation and trade settlement of corporate debt securities bought by CDMDF, specified under Chapter 16A on 'Investment by Mutual Fund Schemes and AMCs in units of Corporate Debt Market Development Fund' of SEBI Master Circular, and circulars / guidelines/ Letters issued by SEBI and AMFI from time to time.
- 2. Investment in Short Term Deposits Pending deployment of funds as per the investment objective of the Scheme, the Funds may be parked in short term deposits of the Scheduled Commercial Banks, subject to guidelines and limits specified by SEBI.
- 3. Investments in units of mutual fund schemes The Scheme may invest in other schemes managed by the AMC or in the schemes of any other mutual funds in conformity with the investment objective of the Scheme and in terms of the prevailing SEBI (MF) Regulations.
- 4. Investment in Units issued by REITs & InvITs The Scheme may invest in the units issued by REITs & InvITs subject to requirements specified under SEBI (MF) Regulations.
- 5. Any other like instruments as may be permitted by RBI/SEBI/ such other Regulatory Authority from time to time.

The securities / instruments mentioned above and such other securities the Scheme is permitted to invest in could be listed, unlisted, privately placed, secured, unsecured, rated or unrated and of any maturity.

The securities may be acquired through initial public offering (IPOs), secondary market, private placement, rights offers, negotiated deals. Further investments in debentures, bonds and other fixed income securities will be in instruments which have been assigned investment grade rating by the Credit Rating Agency.

Investment in unrated debt instruments shall be subject to complying with the provisions of the Regulations and within the limit as specified in Seventh Schedule to the Regulations. Pursuant to clause 12.12.1 of SEBI Master Circular, the AMC may constitute committee(s) to approve proposals for investments in unrated debt instruments. The AMC Board and the Trustee shall approve the detailed parameters for such investments. However, in case any unrated debt security does not fall under the parameters, the prior approval of Board of AMC and Trustee shall be sought.

The Fund Manager reserves the right to invest in such securities as maybe permitted from time to time and which are in line with the investment objectives of the Scheme.

### **Fixed Income Markets in India**

The Fixed Income markets in India can be broken down into three parts:

- 1. Debt Market.
- 2. Money Market.
- 3. Derivatives Market.

**Debt Market:** The debt market is active since the mid 1990s with the introduction of major reforms in the debt market such as the auction system for sale of dated government securities, establishing the system of primary dealers to name a few reforms. This market is predominantly gilt oriented and corporate papers became a part of it since late 1990s. Even today, the Government Securities (G-sec) segment is the largest segment in the debt market with an outstanding stock of Rs. 1,08,19,471.81 crore in March 2025. The Government securities market had a volume of Rs. 10,23,830 crore in March 2025. (Source: The Clearing Corporation of India Ltd.).

The debt market consists of the following instruments:

- Government securities Issued by the Government of India.
- State government securities Issued by the State Government.
- Debt securities Issued by various Corporate, Banks, Financial Institutions.
- Other approved securities like government guaranteed papers.

The nature of instruments is in the form of plain vanilla bonds, Floaters, Zero coupon bonds/deep discounted bonds, securitized papers and structured debt papers.

The major players in Indian debt market are Banks, Mutual Funds, Financial Institutions, Foreign Portfolio Investors, Primary Dealers, Insurance companies and others.

**Money Market**: The money market is a key component of the financial system as it is the fulcrum of monetary operations conducted by the Central Bank in its pursuit of monetary policy objectives. It is a market for short-term funds with maturity ranging from overnight to one year and includes financial instruments that are deemed to be close substitutes of money. Money market instruments facilitate borrowing for relatively short periods of time. They are generally issued at a discount to the maturity value.

The money market in India mainly consists of the following instruments:

- Call money market.
- Tri-party Repo (Treps)
- Treasury bills.
- Commercial papers.
- Certificates of deposits.
- Short Non-Convertible Debentures-fixed and floaters and term lending instruments.

RBI has been taking active steps to develop the money market in India with the objective to improve the signaling mechanism for monetary policy while ensuring financial stability. Various reform measures have resulted in a relatively deep, liquid and vibrant money market with a shift from administered and direct to indirect market based instruments of monetary management. For e.g. the call money market was transformed into a pure interbank market, while other money market instruments such as market repo and TREPS were developed to provide avenues to non-banks, including mutual funds, for managing their short-term liquidity mismatches. For the fortnight ended 30<sup>th</sup> April 2025, the total amount outstanding of commercial papers (at face value) issued was Rs. 545587 crore, whereas the total amount outstanding of certificates of deposits issued by Banks was Rs. 518760 crore for the fortnight ended 18<sup>th</sup> April 2025 (Source-RBI).

The yield ranges (as on May 06, 2025) of various instruments mentioned above, and the factors affecting prices of such securities are given hereunder:

Instrument	Current Yield range (%)
Treps	5.75%-5.80%
Repo	5.90%-6.00%
3m Tbill	5.88%-5.92%
1Y Tbill	5.86%-5.91%
10Y Gsec	6.33%-6.38%
3m PSU Bank CD	6.48%-6.53%
3m Manufacturing Co. CP	6.65%-6.75%
1Y PSU Bank CD	6.72%-6.78%
1YNBFC CP	7.00%-7.10%
1Y Manufacturing Co. CP	6.85%-6.95%
5Y AAA Institutional Bond	6.90%-6.95%
10Y AAA Institutional Bond	6.90%-6.95%

Source: CCIL, Bloomberg

These yields are indicative and do not indicate yields that may be obtained in future as interest rates keep changing consequent to changes in macroeconomic conditions and RBI policy. The price and yield on various debt instruments fluctuate from time to time depending upon the macro economic situation, inflation rate, overall liquidity position, foreign exchange scenario etc. Also, the price and yield vary according to maturity profile, credit risk etc.

### **B. WHAT ARE THE INVESTMENT RESTRICTIONS?**

Pursuant to Regulations, specifically the Seventh Schedule and amendments thereto, the following investment restrictions are currently applicable to the Scheme:

1. The Scheme shall not invest more than 10% of its NAV in debt instruments comprising money market instruments and non-money market instruments issued by a single issuer, which are rated not below investment grade by a credit rating agency authorized to carry out such activities under the SEBI Act, 1992. Such investment limit may be extended to 12% of the NAV of the Scheme with the prior approval of the Board of Trustee and the Board of AMC.

Provided that such limit shall not be applicable for investment in Government Securities, treasury bills and Triparty Repo on Government securities or treasury bills.

Investments within such limit can be made in the mortgaged backed securitised debt, which are rated not below investment grade by a credit rating agency, registered with SEBI.

Further, pursuant to Clause 12.8.3 SEBI Master Circular,

- i. The Scheme shall not invest more than:
  - a. 10% of its NAV in debt and money market securities rated AAA; or
  - b. 8% of its NAV in debt and money market securities rated AA; or
  - c. 6% of its NAV in debt and money market securities rated A and below

issued by a single issuer;

- ii. Such investment limits may be extended by up to 2% of the NAV of the Scheme with the prior approval of the Board of Trustee and the Board of AMC, subject to compliance with overall limit of 12% of the NAV of the scheme as specified above in the first para.
- 2. The Scheme shall not invest in unlisted debt instruments including commercial papers, other than Government Securities, other money market instruments and derivative products such as Interest Rate Swaps (IRS), Interest Rate Futures (IRF), etc which are used by mutual funds for hedging.

Provided that the Scheme may invest in unlisted non-convertible debentures up to a maximum of 10% of the debt portfolio of the Scheme subject to such conditions and requirements as prescribed under Clause 12.1 of the SEBI Master Circular, as amended by SEBI from time to time.

For the purpose of investment in debt instruments, listed debt instruments shall include listed and to be listed debt instruments.

3. The Scheme shall not invest more than 5% of its net assets in unrated debt and money market instruments, other than government securities, treasury bills, derivative products such as IRS, IRF etc.;

Provided that all such investments shall be made with the prior approval of the Board of AMC and the Board of Trustees and shall be subject to such conditions and requirements as prescribed under Clause 12.1.5 of the SEBI Master Circular, as amended by SEBI from time to time.

- 4. The investment by the Scheme in the following instruments shall not exceed 10% of the debt portfolio of the scheme and the group exposure in such instruments shall not exceed 5% of the debt portfolio of the scheme:
  - a. Unsupported rating of debt instruments (i.e. without factoring-in credit enhancements) is below investment grade and
  - b. Supported rating of debt instruments (i.e. after factoring-in credit enhancement) is above investment grade.

For the purpose of this provision, 'Group' shall have the same meaning as defined in Clause 12.9.3.3 of SEBI Master Circular.

These limits shall not be applicable on investments in securitized debt instruments, as defined in SEBI (Public Offer and Listing of Securitized Debt Instruments) Regulations 2008.

Investment in debt instruments, having credit enhancements backed by equity shares directly or indirectly, shall have a minimum cover of 4 times considering the market value of such shares.

5. The Mutual Fund under all its schemes shall own not more than 10% of the debt instruments having special features\* issued by a single issuer.

\*subordination to equity (absorbs losses before equity capital) and/or convertible to equity upon trigger of a pre-specified event for loss absorption.

- 6. The Scheme shall not invest
  - a. more than 10% of Net Assets Value of the debt portfolio of the Scheme, in debt instruments having special features; and
  - b. more than 5% of Net Assets Value of the debt portfolio of the Scheme in debt instruments having special features issued by a single issuer.

The above investment limit for the Scheme shall be within the overall limit for debt instruments issued by a single issuer, as specified at Clause 1 of the Seventh Schedule of the Regulations (refer point no. 1 above), and other prudential limits with respect to the debt instruments.

- 7. The Scheme may invest in other schemes of the Mutual Fund or any other mutual fund without charging any fees, provided the aggregate inter-scheme investment made by all the schemes under the same management or in schemes under the management of any other asset management company shall not exceed 5% of the Net Asset Value of the Fund.
- 8. The Scheme shall not make any investment in
  - Any unlisted security of an associate or group company of the Sponsors; or
  - Any security issued by way of private placement by an associate or group company of the Sponsors; or
  - The listed securities of group companies of the Sponsors which is in excess of 25 percent of the net assets of the Scheme.
- 9. Transfer of investments from one scheme to another scheme in the Mutual Fund is permitted provided:
  - Such transfers are done at the prevailing market price for quoted instruments on Spot Basis (Spot Basis shall have the same meaning as specified by a stock exchange for spot transactions); and in line with the process laid down under the Valuation Policy of the Mutual Fund; and
  - The Securities so transferred shall be in conformity with the investment objective of the Scheme to which such transfer has been made.

However, in terms of Clause 12.30.2.2 of SEBI Master Circular, inter scheme transfers (ISTs) are allowed only in case of raising liquidity and for duration/Issuer/Sector/Group rebalancing with the following conditions:

In case of raising liquidity, ISTs permitted if:

- a. Use of scheme cash & cash equivalent
- b. Use of market borrowings
- c. Selling of scheme securities in the market
- d. After attempting all the above, if there is still a scheme level liquidity deficit, then out of the remaining securities, outward Inter Scheme Transfers (ISTs) of the optimal mix of low duration paper with highest quality shall be effected. The use of market borrowing before ISTs will be optional and Fund Manager may at his discretion take decision on borrowing in the best interest of unitholders.

In case of Duration/Issuer/Sector/Group rebalancing, ISTs permitted if:

- a. ISTs shall be allowed only to rebalance the breach of regulatory limit.
- b. ISTs can be done where any one of duration, issuer, sector and group balancing is required in both the transferor and transferee schemes.

No ISTs of a security shall be allowed, if there is negative news or rumors in the mainstream media or an alert is generated about the security, based on internal credit risk assessment in terms of Clause 4.3 of SEBI Master Circular during the previous four months.

- 10. The Mutual Fund shall get the securities purchased transferred in the name of the Fund on account of the concerned Scheme, wherever investments are intended to be of a long-term nature.
- 11. The Mutual Fund shall buy and sell securities on the basis of deliveries and shall in all cases of purchases, take delivery of relevant securities and in all cases of sale, deliver the securities.

Provided further that the Mutual Fund may enter into derivatives transactions in a recognized stock exchange, subject to the framework specified by SEBI.

Provided further that sale of government security already contracted for purchase shall be permitted in accordance with the guidelines issued by the Reserve Bank of India in this regard.

- 12. The Scheme shall not make any investment in any fund of funds scheme.
- 13. Save as otherwise expressly provided under SEBI (Mutual Funds) Regulations, 1996, the Scheme shall not advance any loans.
- 14. The Fund shall not borrow except to meet temporary liquidity needs of the Fund for the purpose of repurchase/redemption of Units or payment of interest and/IDCW to the Unit holders.

Provided that the Fund shall not borrow more than 20% of the net assets of the individual Scheme and the duration of the borrowing shall not exceed a period of 6 month.

- 15. SEBI, vide Clause 12.24 & 12.25 of the SEBI Master Circular has prescribed the following investment restrictions with respect to investment in derivatives:
  - a. The cumulative gross exposure through repo transactions in corporate debt securities alongwith investments in debt securities, money market instruments, units issued by REITs & InvITs and exposure in derivatives' positions shall not exceed 100% of the net assets of the Scheme.Cash or cash equivalents with residual maturity of less than 91 days may be treated as not creating any exposure.
  - b. Mutual Fund shall not write options or purchase instruments with embedded written options.
  - c. The total exposure related to option premium paid must not exceed 20% of the net assets of the Scheme.
  - d. Exposure due to hedging positions may not be included in the above mentioned limits subject to the following:
    - i. Hedging positions are the derivative positions that reduce possible losses on an existing position in securities and till the existing position remains;
    - ii. Hedging positions cannot be taken for existing derivative positions. Exposure due to such positions shall have to be added and treated under limits mentioned in Point (a) above.
    - iii. Any derivative instrument used to hedge has the same underlying security as the existing position being hedged.

- iv. The quantity of underlying associated with the derivative position taken for hedging purposes does not exceed the quantity of the existing position against which hedge has been taken.
- e. Mutual Fund may enter into plain vanilla interest rate swaps for hedging purposes. The counter party in such transactions has to be an entity recognized as a market maker by RBI. Further, the value of the notional principal in such cases must not exceed the value of respective existing assets being hedged by the Scheme. Exposure to a single counterparty in such transactions should not exceed 10% of the net assets of the Scheme. However, if the Mutual Fund is transacting in interest rate swaps through an electronic trading platform offered by the Clearing Corporation of India Ltd. (CCIL) and CCIL is the central counterparty for such transactions guaranteeing settlement, the single counterparty limit of 10% shall not be applicable.
- f. Exposure due to derivative positions taken for hedging purposes in excess of the underlying position against which the hedging position has been taken, shall be treated under the limits mentioned in Point (a) above.

#### **Exposure limit for Hedging of Interest Rate Risk**

In addition to the above, the exposure limits for trading in Interest Rate Futures by Mutual Funds specified under Clause 12.25.9 of SEBI Master Circular are as follows:

i. To reduce interest rate risk in a debt portfolio, mutual funds may hedge the portfolio or part of the portfolio (including one or more securities) on weighted average modified duration basis by using Interest Rate Futures (IRFs). The maximum extent of short position that may be taken in IRFs to hedge interest rate risk of the portfolio or part of the portfolio, is as per the formula given below:

(Portfolio Modified Duration \* Market Value of the Portfolio) (Futures Modified Duration \* Future Price/ PAR)

- ii. In case the IRF used for hedging the interest rate risk has different underlying security(s) than the existing position being hedged, it would result in imperfect hedging.
- iii. Imperfect hedging using IRFs may be considered to be exempted from the gross exposure, upto maximum of 20% of the net assets of the scheme, subject to the following:
  - a) Exposure to IRFs is created only for hedging the interest rate risk based on the weighted average modified duration of the bond portfolio or part of the portfolio.
  - b) Mutual Funds are permitted to resort to imperfect hedging, without it being considered under the gross exposure limits, if and only if, the correlation between the portfolio or part of the portfolio (excluding the hedged portions, if any) and the IRF is atleast 0.9 at the time of initiation of hedge. In case of any subsequent deviation from the correlation criteria, the same may be rebalanced within 5 working days and if not rebalanced within the timeline, the derivative positions created for hedging shall be considered under the gross exposure computed in terms of clause 12.25.9.3 of SEBI Master Circular. The correlation should be calculated for a period of last 90 days.

Explanation: If the fund manager intends to do imperfect hedging upto 15% of the portfolio using IRFs on weighted average modified duration basis, either of the following conditions need to be complied with:

i. The correlation for past 90 days between the portfolio and the IRF is at least 0.9 or

- ii. The correlation for past 90 days between the part of the portfolio (excluding the hedged portions, if any) i.e. at least 15% of the net asset of the scheme (including one or more securities) and the IRF is at least 0.9.
- c) At no point of time, the net modified duration of part of the portfolio being hedged should be negative.
- d) The portion of imperfect hedging in excess of 20% of the net assets of the scheme should be considered as creating exposure and shall be included in the computation of gross exposure in terms of Clause 12.25.9.3 of SEBI Master Circular.
- iv. The basic characteristics of the scheme should not be affected by hedging the portfolio or part of the portfolio (including one or more securities) based on the weighted average modified duration.

Explanation: In case of long term bond fund, after hedging the portfolio based on the modified duration of the portfolio, the net modified duration should not be less than the minimum modified duration of the portfolio as required to consider the fund as a long term bond fund.

- v. The interest rate hedging of the portfolio should be in the interest of the investors.
- 16. The Scheme's total exposure in a particular sector (excluding investments in Bank CDs, TREPS, Government Securities, T-Bills and AAA rated securities issued by Public Financial Institutions and Public Sector Banks) shall not exceed 20% of the net assets of the Scheme;

Provided that an additional exposure to financial services sector (over and above the limit of 20%) not exceeding 10% of the net assets of the Scheme shall be allowed by way of increase in exposure to Housing Finance Companies (HFCs) only. Further, an additional exposure of 5% of the net assets of the scheme has been allowed for investments in securitized debt instruments based on retail housing loan portfolio/ an affordable housing loan portfolio;

Provided further that the additional exposure to such securities issued by HFCs are rated AA and above and these HFCs are registered with National Housing Bank (NHB) and the total Investment/exposure in HFCs shall not exceed 20% of the net assets of the Scheme.

Since the investments in short term deposits of scheduled commercial banks is allowed pending deployment of funds of a scheme, the same shall also be excluded while calculating the sector exposure.

17. The Scheme's total exposure in a group (excluding investments in securities issued by Public Sector Units, Public Financial Institutions and Public Sector Banks) shall not exceed 20% of the net assets of the Scheme. Such investment limit may be extended to 25% of the net assets of the Scheme with the prior approval of the Board of Trustee.

The investments by the Scheme in debt and money market instruments of group companies of both the Sponsors and the AMC shall not exceed 10% of the net assets of the scheme. Such investment limit may be extended to 15% of the net assets of the scheme with the prior approval of the Board of Trustees.

For this purpose, a group means a group as defined under regulation 2 (mm) of the Regulations and shall include an entity, its subsidiaries, fellow subsidiaries, its holding company and its associates.

- 18. Pending deployment of funds of the Scheme in terms of the investment objective of the Scheme, the AMC may invest the funds of the Scheme in short term deposits of scheduled commercial banks in accordance with the guidelines set out by SEBI under the Regulations. The Scheme will comply with the following guidelines/restrictions for parking of funds in short term deposits:
  - a. "Short Term" for parking of funds shall be treated as a period not exceeding 91 days.
  - b. Such short-term deposits shall be held in the name of the Scheme.
  - c. The Scheme shall not park more than 15% of the net assets in short term deposit(s) of all the scheduled commercial banks put together. However, such limit may be raised to 20% with the approval of the Trustee.
  - d. Parking of funds in short term deposits of associate and Sponsors scheduled commercial banks together shall not exceed 20% of total deployment by the Mutual Fund in short term deposits.
  - e. The Scheme shall not park more than 10% of the net assets in short term deposit(s), with any one scheduled commercial bank including its subsidiaries.
  - f. The Scheme shall not park funds in short-term deposit of a bank which has invested in the said Scheme. Further, it shall also be ensured that the bank in which the Scheme has short term deposit does not invest in the Scheme until the Scheme has short term deposit with such bank.
  - g. The AMC shall not charge any investment management and advisory fees for parking of funds in short term deposits of scheduled commercial banks.

However, the above provisions will not apply to term deposits placed as margins for trading in cash and derivatives market.

- 19. The Mutual Fund under all its schemes shall not invest more than 10% of units issued by a single issuer of REITs and InvITs.
- 20. The Scheme shall not invest:
  - more than 10% of its NAV in the units of REITs and InvITs; and
  - more than 5% of its NAV in the units of REITs and InvITs issued by a single issuer.

All the investment restrictions will be applicable at the time of making investments.

There are no internal norms prescribed vis-à-vis limiting exposure to a particular scrip, issuer or sector, etc. The AMC/Trustee may alter these above stated restrictions from time to time to the extent the Regulations change, so as to permit the Scheme to make its investments in the full spectrum of permitted investments for mutual funds to achieve its respective investment objective.

## C. FUNDAMENTAL ATTRIBUTES

Following are the Fundamental Attributes of the Scheme, in terms of clause 1.14 of SEBI Master Circular for Mutual Funds Dated June 27, 2024:

- i. Type of scheme An open ended dynamic debt scheme investing across duration. A relatively high interest rate risk and moderate credit risk.
- ii. Investment Objective
  - Main Objective Refer Section I, Part I
  - Investment pattern Refer Section I, Part II Point A
- iii. Terms of Issue:-
  - Liquidity provisions such as listing, repurchase, redemption. Refer Section I, Part I and Section II, Sub- Section II Point no. D

- Aggregate maximum fees and expenses charged to the Scheme. Refer Section I, Part III, Point no. C Annual Scheme Recurring Expenses;
- Any safety net or guarantee provided **Not Applicable.** The Scheme does not provide any guaranteed or assured return.

In accordance with Regulation 18(15A) of the SEBI (MF) Regulations and clause 1.14 of the SEBI Master Circular, the Trustees shall ensure that no change in the fundamental attributes of the Scheme and the Plan(s)/Option(s) thereunder, or the trust or the fees and expenses payable or any other change which would modify the Scheme the Plan(s)/Option(s) thereunder and and affect the interest of the unit holders is carried out by the AMC, unless it complies with sub-regulation (26) of regulation 25 of SEBI (MF) Regulations.

Pursuant to Regulation 25(26) of the SEBI (MF) Regulations and Clause 1.14.1.4 of SEBI Master Circular the AMC shall ensure that no change in the fundamental attributes of the Scheme and the Plan(s)/Option(s) thereunder or the trust or the fees and expenses payable or any other change which would modify the Scheme and the Plan(s)/Option(s) thereunder and affect the interest of unit holders, shall be carried out unless-

- SEBI has reviewed and provided its comments on the proposal
- A written communication about the proposed change is sent to each Unit holder and an advertisement is given in one English daily newspaper having nationwide circulation as well as in a newspaper published in the language of the region where the Head Office of the Mutual Fund is situated; and
- The Unit holders are given an option for a period of 30 calendar days to exit at the prevailing Net Asset Value without any Exit Load.

Change(s) in fundamental attributes will not cover any changes to be carried out in the Scheme in order to comply with any amendment(s) in the Regulations and/or changes resulting out of requirement(s) laid down under any SEBI circular(s) / regulatory guidelines and hence the abovementioned process for carrying out changes in the fundamental attributes, will not apply for such cases where changes are required to be carried out in the Scheme as a result of any regulatory notifications.

# D. OTHER SCHEME SPECIFIC DISCLOSURES:

Listing and transfer of units	Listing:
	The Scheme is an open ended debt scheme under which sale and repurchase will be made on a continuous basis and therefore listing on stock exchanges is not envisaged. However, the Trustee may at their discretion list the units on any Stock Exchange.
	Transfer:
	Units of all schemes of the Fund which are held in demat form shall be freely transferable under the depository system and in accordance with the provisions of the SEBI (Depositories and Participants) Regulations, 1996.
	Further, if a person becomes a holder of the units consequent to operation of law, or upon enforcement of a pledge, the Mutual Fund will, subject to production of satisfactory evidence, effect the transfer, if the transferee is otherwise eligible to hold the units.

	The AMC shall, on production of instrument of transfer together with relevant unit certificates, register the transfer and return the unit certificate to the transferee within 30 days from the date of such production. However, investors are requested to note that issuance of Unit Certificates or request for Unit Certificate transfer to any transferee thereof, would attract Stamp Duty/Statutory levies as stipulated by the Government authorities from time to time. <b>Transfer of units held in Non-Demat/Statement of Account (SoA)</b> <b>mode:</b>
	Pursuant to AMFI Best Practices Guidelines Circular No. 135/BP/116/2024-25 dated August 14, 2024, read with AMFI Circular No. 135/BP/119/2025-26 dated May 08, 2025, the facility for transfer of units held in Non-Demat/SoA mode shall be made available to all the Investors/Unitholders falling under resident/non-resident Individual category including the unitholders falling under the following three categories –
	<ul> <li>a. Surviving joint unitholder, who wants to add new joint holder(s) in the folio upon demise of one or more joint unitholder(s).</li> <li>b. A nominee of a deceased unitholder, who wants to transfer the units to the legal heirs of the deceased unitholder, post the transmission of units in the name of the nominee.</li> <li>c. A minor unitholder who has turned a major and has changed his/her status from minor to major, wants to add the name of the parent / guardian, sibling, spouse etc. in the folio as joint holder(s).</li> </ul>
	For detailed disclosure / process on transfer of units held in Non-Demat mode (SoA), kindly refer SAI.
Dematerialization of units	Option to hold units in dematerialised (demat) form:
	The Unit holders would have an option to hold the Units in electronic i.e. demat form (except for investments under IDCW Option with less than monthly frequency). The Applicants intending to hold Units in demat form will be required to have a beneficiary account with a Depository Participant (DP) of the NSDL/CDSL and will be required to mention in the application form DP's Name, DP ID No. and Beneficiary Account No. with the DP at the time of purchasing Units. The AMC/ RTA will endeavour to credit the units in the demat account of the investor within 2 working days from the date of receipt of valid request with complete details.
	In case investors desire to convert their existing physical units (represented by statement of account) into dematerialized form or vice versa, the request for conversion of units held in physical form into Demat (electronic) form or vice versa should be submitted along with a Demat/Remat Request Form to their Depository Participants. In case the units are desired to be held by investor in dematerialized form, the KYC performed by Depository Participant shall be considered compliance of the applicable SEBI norms.

<b>Minimum Target amount</b> This is the minimum amount required to operate the scheme and if this is not collected during the NFO period, then all the investors would be refunded the amount invested without any return.	Investors desirous of having the Units of the Scheme in dematerialized form should contact the ISCs of the AMC/Registrar. For details, Investors may contact any of the Investor Service Centres of the AMC. <b>Account Statement for demat account holders</b> In case of Unit Holders holding units in the dematerialized mode, the AMC will not send the account statement to the Unit Holders. The demat statement issued by the Depository Participant would be deemed adequate compliance with the requirements in respect of dispatch of statements of account. Not Applicable
Maximum Amount to be raised (if any) This is the maximum amount which can be collected during the NFO period, as decided by the AMC.	Not Applicable.
Income Distribution Cum Capital Withdrawal (IDCW) Policy	Under the Income Distribution cum Capital Withdrawal/IDCW option, the Trustee will have discretion to declare the IDCW, subject to availability of distributable surplus calculated in accordance with the Regulations. The actual declaration of IDCW and frequency will inter- alia, depend on availability of distributable surplus calculated in accordance with SEBI (MF) Regulations and the decisions of the Trustee shall be final in this regard. There is no assurance or guarantee to the Unitholder as to the rate of IDCW nor that will the IDCW be paid regularly.
	IDCW Distribution Procedure
	In accordance with Clause 11.6 of SEBI Master Circular, the procedure for IDCW distribution would be as under:
	1. Quantum of IDCW and the record date will be fixed by the Trustee. IDCW so decided shall be paid, subject to availability of distributable surplus.
	2. Within one calendar day of the decision by the Trustees, the AMC shall issue notice to the public communicating the decision including the record date. The record date shall be 2 working days from the date of publication in at least one English newspaper or in a newspaper published in the language of the region where the Head Office of the mutual fund is situated, whichever is issued earlier.

	<ol> <li>Record date shall be the date, which will be considered for the purpose of determining the eligibility of Unitholders whose names appear on the register of Unitholder for receiving IDCWs.</li> <li>The notice will, in font size 10, bold, categorically state that pursuant to payment of IDCW, the NAV of the Scheme would fall to the extent of payout and statutory levy (if applicable).</li> <li>The NAV will be adjusted to the extent of IDCW distribution and statutory levy, if any, at the close of Business Hours on record date.</li> <li>Before the issue of such notice, no communication indicating the probable date of IDCW declaration in any manner whatsoever will be issue of the IDCW declaration in any manner whatsoever</li> </ol>
	will be issued by Mutual Fund.
	The requirement of giving notice shall not be applicable for IDCW options having frequency upto one month.
Allotment (detailed procedure)	On acceptance of the application for subscription, an allotment confirmation specifying the number of units allotted by way of e-mail and/or SMS within 5 business days from the date of closure of NFO period will be sent to the Unitholders/ investors registered e-mail address and/or mobile number.
	In cases where the email does not reach the Unitholder/ investor, the Fund / its Registrar & Transfer Agents will not be responsible, but the Unitholder/ investor can request for fresh statement/confirmation. The Unitholder/ investor shall from time to time intimate the Fund / its Registrar & Transfer Agents about any changes in his e-mail address.
	Applicants under both the Direct and Regular Plan(s) offered under the Scheme will have an option to hold the Units either in physical form (i.e. account statement) or in dematerialized form.
	Where investors / Unitholders, have provided an email address, an account statement reflecting the units allotted to the Unitholder shall be sent by email on their registered email address.
	However, in case of Investors/ Unit Holders holding units in the dematerialized mode, the Fund will not send the account statement to the Unit Holders. The statement provided by the Depository Participant will be equivalent to the account statement.
	For further details, refer section on "Account Statement"
Refund	Not Applicable
(During NFO)	**
Who can invest This is an indicative list and investors are requested to consult your financial advisor to ascertain whether the scheme is suitable to your risk profile.	The following persons (subject, wherever relevant, to purchase of Units, being permitted and duly authorized under their respective constitutions / bye-laws, charter documents and relevant statutory regulations) are eligible and may apply for purchase Subscription to the Units under the Scheme:
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	1. Desident adalt individuals side a simple on initial (not see a disc
	1. Resident adult individuals either singly or jointly (not exceeding
	three) or on an Anyone or Survivor basis;
	2. Hindu Undivided Family (HUF) through Karta;
	3. Minor through parent / legal guardian;
	4. Partnership Firms including limited liability partnership firms;
	5. Proprietorship in the name of the sole proprietor;
	6. Companies, Bodies Corporate, Public Sector Undertakings (PSUs.),
	Association of Persons (AOP) or Bodies of Individuals (BOI) and
	societies registered under the Societies Registration Act, 1860;
	7. Banks (including Co-operative Banks and Regional Rural Banks) and
	Financial Institutions;
	8. Religious and Charitable Trusts, Wakfs or endowments of private trusts (subject to receipt of necessary approvals as "Public Securities"
	as required) and Private trusts authorised to invest in mutual fund
	schemes under their trust deeds;
	9. Non-Resident Indians (NRIs) / Persons of Indian origin (PIOs)
	residing abroad on repatriation basis or on non-repatriation basis;
	10. Foreign Portfolio Investors (FPIs) registered with SEBI;
	11. Army, Air Force, Navy and other para-military units and bodies
	created by such institutions;
	12. Scientific and Industrial Research Organisations;
	13. Multilateral Funding Agencies / Bodies Corporate incorporated
	outside India with the permission of Government of India / RBI;
	14. Provident/ Pension/ Gratuity Fund to the extent they are permitted;
	15. Other schemes of Mahindra Manulife Mutual Fund or any other
	mutual fund subject to the conditions and limits prescribed by SEBI
	Regulations;
	16. Trustee, AMC or Sponsors or their associates may subscribe to Units
	under the Scheme;
	17. Such other person as maybe decided by the AMC from time to time.
Who cannot invest	It should be noted that the following persons cannot invest in the Scheme:
	1. Any individual who is a foreign national or any other entity that is
	not an Indian resident under the Foreign Exchange Management Act,
	1999 (FEMA Act) except where registered with SEBI as a FPI or
	otherwise explicitly permitted under FEMA Act/ by RBI/ by any
	other applicable authority, or as stated in the exception in point no. 5
	hereunder; 2 Overseas Corporate Bodies (OCBs)
	<ol> <li>Overseas Corporate Bodies (OCBs)</li> <li>NRIs residing in Non-Compliant Countries and Territories (NCCTs)</li> </ol>
	as determined by the Financial Action Task Force (FATF), from time
	to time.
	4. Residents of Canada as defined under the applicable laws of Canada;
	5. U.S. Person* (including all persons residing in U.S., U.S.
	Corporations or other entities organised under the laws of U.S),
	except lump sum subscriptions, switch transaction requests and
	requests for registration of systematic transactions received from
	Non-resident Indians / Persons of Indian origin who at the time of
	such investment / registration of systematic transaction, are
	physically present in India and submit only a physical transaction
	request along with such documents / undertakings, etc. as may be
	prescribed by the AMC / Mutual Fund from time to time. The AMC
	shall accept such investments/transaction requests subject to

	compliance with the applicable laws and such other terms and
	conditions as may be notified by the AMC/Mutual Fund.
	*The term "U.S. Person" means any person that is a U.S. Person within the meaning of Regulation S under the Securities Act of 1933 of the United States or as defined by the U.S. Commodity Futures Trading Commission or as per such further amended definitions, interpretations, legislations, rules etc., as may be in force from time to time.
	The physical application form(s) for transactions (in non-demat mode) from such U.S. person will be accepted only at the official points of acceptance of transactions of the Fund in India. Additionally, such transactions in physical application form(s) will also be accepted through Distributors of the AMC and other platforms in India, subject to receipt of such additional documents/undertakings, etc., as may be stipulated by the AMC / Trustee from time to time.
	The investor shall be responsible for complying with all applicable laws for such investments. The AMC/Trustee reserves the right to put the application form/transaction request on hold/reject the subscription/transaction request and redeem the units, if already allotted, as the case may be, as and when identified by the AMC that the same is not in compliance with the applicable laws, the terms and conditions stipulated by the AMC/Trustee from time to time and/or the documents/undertakings provided by such investors are not satisfactory. Such redemption will be processed at the applicable Net Asset Value and subject to applicable taxes and exit load, if any
	If an existing Unit Holder(s) subsequently becomes a U.S. Person or Resident of Canada, then such Unit Holder(s) will not be able to purchase any additional Units in any of the Schemes of the Fund except in the manner stated in point no. 5 above.
	The Mutual Fund reserves the right to include/exclude new/existing categories of investors to invest in the Scheme from time to time, subject to SEBI Regulations and other prevailing statutory regulations, if any. The Mutual Fund / Trustee / AMC may redeem Units of any Unitholder in the event it is found that the Unitholder has submitted information either in the application or otherwise that is false, misleading or incomplete or Units are held by any person in breach of the SEBI Regulations, any law or requirements of any governmental, statutory authority.
How to Apply and other details	New investors can purchase units of the Scheme by using an application form, whereas, existing Unit holders may use a transaction slip or application form. Application forms or transaction slips will be available at the Investor Service Centres (ISCs)/ Official Points of Acceptance of transactions during Business Hours on Business Days. The same can also be downloaded from the website of the Mutual Fund viz. www.mahindramanulife.com. For details on updated list of ISCs / Official Points of Acceptance, investors may log on to 'Contact Us' section on our website <u>www.mahindramanulife.com</u> .

The duly completed application form/transaction slip as the case maybe, can be submitted at the designated ISCs / Official Points of Acceptance and will be subject to verification.
Investors may also undertake transactions viz. purchase / redemption / switch through the AMC's online transaction portal available on its website viz., <u>www.mahindramanulife.com</u> and such other online/electronic modes / sources as communicated by the AMC from time to time. Further, the investors may also submit transactions in electronic modes offered by specified banks, financial institutions, distributors etc., with whom the AMC has entered or may enter into specific arrangements including through secured internet sites operated by CAMS.
Further, Investor may also transact through RTA inter-operable platform viz. MFCentral. It is created with an intent to be a one stop portal / mobile app for all mutual fund investments and service-related needs that significantly reduces the need for submission of physical documents by enabling various digital / physical services to mutual fund investors across fund houses subject to applicable Terms & Conditions of the Platform. MFCentral has enabled execution of various types of Financial and Non-financial transactions on their platform. For more details, investors may access the MFCentral website using https://mfcentral.com/and/or access the MF Central Mobile App.
The investors can subscribe to / switch / redeem the Units of the Scheme vide the Stock Exchange Infrastructure Facility viz. MFSS & NMF II platform of National Stock Exchange(NSE) and "BSEStAR MF" platform of Bombay Stock Exchange (BSE) through trading members of the NSE and BSE respectively, who are registered with AMFI OR SEBI- Registered Investment Advisors (RIAs)/ SEBI-Registered Portfolio Managers and AMFI-registered Mutual Fund Distributors who are empaneled with NSE and BSE. Please contact any of the Investor Service Centers of the Mutual Fund to understand the detailed process of transacting through this facility.
All applicants for Purchase of Units /Redemption of Units must provide a bank name and, bank account number, branch address, and account type in the Application Form.
For updated list of AMC branch offices, please visit <u>https://www.mahindramanulife.com/contact-us</u>
Please refer <u>https://www.mahindramanulife.com/downloads#MANDATORY-</u> <u>DISCLOSURES-+-Offer-Document-Related-Disclosures</u> for details for list of official points of acceptance of AMC and RTA or. refer the back cover page.
Details of Registrar & Transfer Agent:
Name: Computer Age Management Services Limited

The policy regarding reissue	Address: 'C' Block, 2 <sup>nd</sup> Floor, Hanudev Info Park P Ltd, Sf No 558/2, Udayampalayam Road, Nava India, Coimbatore-64102 Contact no.: 1800-419-2267 (Toll-free no.)/044 66073600 Email id:enq_mm@camsonline.com Website address: www.camsonline.com For further details (including Collecting Banker details), please refer SAI and application form for the instructions. Units once redeemed will be extinguished and will not be reissued.
of repurchased units, including the maximum extent, the manner of reissue, the entity (the Scheme or the AMC) involved in the same.	
Restrictions, if any, on the right to freely retain or dispose of units being offered.	<ul> <li>Pledge of Units:-</li> <li>The Units under the Scheme may be offered as security by way of a pledge / charge in favour of scheduled banks, financial institutions, non-banking finance companies ("NBFC's), or any other body. The AMC/RTA will note and record such Pledged Units. A standard form for this purpose is available on request at all ISCs and the Mutual Fund website (www.mahindramanulife.com). The AMC shall mark a lien on the specified units only upon receiving the duly completed form and documents as it may require. Disbursement of such loans will be at the entire discretion of the bank / financial institution / NBFC or any other body concerned and the Mutual Fund assumes no responsibility thereof.</li> <li>The Pledgor will not be able to redeem/switch Units that are pledged until the entity to which the Units are pledged provides a written authorisation to the Mutual Fund that the pledge / lien/ charge may be removed. As long as Units are pledged, the Pledge ewill have complete authority to redeem such Units. IDCW declared on Units under lien will be paid / reinvested to the credit of the Unit Holder and not the lien holder unless specified otherwise in the lien letter.</li> <li>For units of the Scheme held in electronic (Demat) form, the rules of Depository applicable for pledge will be applicable for Pledge/Assignment of units of the Scheme. Pledgor and Pledgee must have a beneficial account with the Depository. These accounts can be with the same DP or with different DPs.</li> <li>Lien on Units:-</li> <li>On an ongoing basis, when existing and new investors make Subscriptions, pending clearance of the payment instrument, a temporary hold (lien) will be created on the Units allotted and such Units shall not be available for redemption/switch out until the payment proceeds are realised by the Fund. In case the cheque/draft is dishonoured during clearing process by the bank, the transaction will be reversed and the Units allotted there against shall be cancelled under intimation to the applicant.</li></ul>

FIRC/Account debit letter) have not been submitted along with the application form and before the submission of the redemption request. The AMC reserves the right to change the operational guidelines for temporary lien on Units from time to time.
<b>Right to Limit Redemptions:</b> - Subject to the approval of Board of Directors of the AMC and Trustee Company and immediate intimation to SEBI, a restriction on redemptions may be imposed by the Scheme when there are circumstances, which the AMC / Trustee believe that may lead to a systemic crisis or event that constrict liquidity of most securities or the efficient functioning of markets such as:
<ol> <li>Liquidity issues - when market at large becomes illiquid affecting almost all securities rather than any issuer specific security.</li> <li>Market failures, exchange closures - when markets are affected by unexpected events which impact the functioning of exchanges or the regular course of transactions. Such unexpected events could also be related to political, economic, military, monetary or other emergencies.</li> <li>Operational issues – when exceptional circumstances are caused by force majeure, unpredictable operational problems and technical failures (e.g. a black out). Such cases can only be considered if they are reasonably unpredictable and occur in spite of appropriate diligence of third parties, adequate and effective disaster recovery procedures and systems.</li> </ol>
Such restriction on redemption may be imposed for a specified period of time not exceeding 10 working days in any 90 days period. However, if exceptional circumstances / systemic crisis referred above continues beyond the expected timelines, the restriction may be extended further subject to the prior approval of Board of Directors of the AMC and Trustee Company giving details of circumstances and justification for seeking such extension shall also be informed to SEBI in advance.
<ul> <li>Procedure to be followed while imposing restriction on redemptions</li> <li>a. No redemption requests upto INR 2 lacs per request shall be subject to such restriction;</li> <li>b. Where redemption requests are above INR 2 lacs: <ol> <li>The AMC shall redeem the first INR 2 lacs of each redemption request, without such restriction;</li> </ol> </li> </ul>
ii. Remaining part over and above INR 2 lacs shall be subject to such restriction and be dealt as under:
<ul> <li>Any Units which are not redeemed on a particular Business Day will be carried forward for Redemption to the next Business Day, in order of receipt.</li> <li>Redemptions so carried forward will be priced on the basis of the Applicable NAV (subject to the prevailing Load, if any) of the subsequent Business Day(s) on which redemptions are being processed.</li> </ul>

	Under such circumstances, to the extent multiple redemption requests are received at the same time on a single Business Day, redemptions will be made on a prorata basis based on the size of each redemption request, the balance amount being carried forward for redemption to the next Business Day.
Cut off timing for	Subscriptions/Purchases including Switch – ins of any amount
subscriptions / redemptions /	Substriptions, raionases morading owner and or any amount
switches	• In respect of valid applications received upto 3.00 p.m. on a Business
Switches	• In respect of valid applications received upto 5.00 p.m. of a Business Day at the Official Point(s) of Acceptance and where the funds for
This is the time before which your application (complete in all respects) should reach the official points of acceptance.	<ul> <li>the entire amount of subscription / purchase as per the application / switch-in request, are credited to the bank account of the Scheme before the cut-off time i.e. available for utilization before the cut-off time - the closing NAV of the day on which application is received shall be applicable.</li> <li>In respect of valid applications received after 3.00 p.m. on a Business Day at the Official Point(s) of Acceptance and where the funds for the entire amount of subscription / purchase as per the application / switch-in request, are credited to the bank account of the Scheme before the cut-off time of the next Business Day i.e. available for utilization before the cut-off time of the next Business Day - the closing NAV of the next Business Day shall be applicable.</li> <li>Irrespective of the time of receipt of applications at the Official Point(s) of Acceptance, where the funds for the entire amount of subscription/purchase as per the application.</li> </ul>
	<ul> <li>credited to the bank account of the Scheme before the cut-off time on any subsequent Business Day i.e. available for utilization before the cut-off time on any subsequent Business Day - the closing NAV of such subsequent Business Day shall be applicable.</li> <li>For determining the applicability of NAV for allotment of units in respect of Subscriptions/Purchases including Switch –ins to the Scheme the following shall be ensured:</li> </ul>
	<ol> <li>Subscription/Purchase application/switch-in request is received before the applicable cut-off time</li> <li>Funds for the entire amount of subscription/purchase (including switch-in) as per the application should be credited to the bank account of the Scheme before the cut-off time and the funds are available for utilisation before the cut-off time without availing any credit facility whether intra-day or otherwise, by the Scheme</li> <li>In case of 'switch' transactions from one scheme to another, the switch-out will be processed on the date of receipt of transaction, if received before cut-off time and corresponding Switch-In transaction will be processed based on the pay out / settlement date of the respective Switch-Out Scheme</li> </ol>
	Further, it may be noted that:
	<ul> <li>Where funds are transferred/received first and application is submitted thereafter, the date and time of receipt of the application shall be considered for NAV applicability</li> <li>In case of investments through systematic investment routes such as</li> </ul>
	Systematic Investment Plans, Systematic Transfer Plans, etc, the

	units will be allotted as per the closing NAV of the day on which the funds are available for utilisation by the Scheme irrespective of amount and installment date of the systematic transactions.
	Redemptions including Switch–Outs:
	• In respect of valid applications received upto 3 p.m. on a business day by the Mutual Fund – the closing NAV of the day of receipt of application, shall be applicable.
	• In respect of valid applications received after 3 p.m. on a business day by the Mutual Fund – the closing NAV of the next business day shall be applicable.
	The above mentioned cut off timing shall also be applicable to transactions through the online trading platform. The Date of Acceptance will be reckoned as per the date & time; the transaction is entered in stock exchange's infrastructure for which a system generated confirmation slip will be issued to the unitholder.
Minimum amount for	Minimum Amount for Subscription / Purchase:
purchase/redemption/switches	Rs. 1,000/- and in multiples of Re. 1/- thereafter.
F	
	Minimum Amount for Switch in:
	Rs. 1,000/- and in multiples of Re. 0.01/- thereafter.
	RS. 1,000/ und in multiples of Re. 0.01/ thereafter.
	Minimum Additional Purchase Amount:
	Rs. 1,000/- and in multiples of Re.1/- thereafter.
	Minimum Amount for Redemption / Switch-outs: Rs. 1,000/- or 100 unit or account balance, whichever is lower in respect of each Option. In case the Investor specifies both the number of units and amount, the number of Units shall be considered for Redemption. In case the unitholder does not specify the number or amount, the request will not be processed.
	Where Units under a Scheme are held under both Plans and the redemption / Switch request pertains to the Direct Plan, the same must clearly be mentioned on the request (along with the folio number), failing which the request would be processed from the Regular Plan. However, where Units under the requested Option are held only under one Plan, the request would be processed under such Plan.
	<b>Note:</b> The requirements w.r.t minimum application amount and minimum redemption amount will not be applicable for investment(s) made in the Scheme, pursuant to Clause 6.10 of the SEBI Master Circular on 'Alignment of interest of Designated Employees of Asset Management Companies (AMCs) with the Unitholders of the Mutual Fund Schemes'.
	The requirements w.r.t minimum redemption units or account balance shall not be applicable for Units held in Demat mode.

Account Statements	The AMC shall send an allotment confirmation specifying the units allotted by way of email and/or SMS within 5 working days of receipt of valid application/transaction to the Unit holders registered e-mail address and/ or mobile number (whether units are held in demat mode or in account statement form).
	A Consolidated Account Statement (CAS) detailing all the transactions across all mutual funds (including transaction charges paid to the distributor) and holding at the end of the month shall be sent to the Unit holders in whose folio(s) transaction(s) have taken place during the month by mail or email on or before 15 <sup>th</sup> of the succeeding month.
	Half-yearly CAS shall be issued at the end of every six months (i.e. September/ March) on or before 21 <sup>st</sup> day of succeeding month, to all investors providing the prescribed details across all schemes of mutual funds and securities held in dematerialized form across demat accounts, if applicable
	For further details, refer SAI.
Income Distribution cum	The payment of IDCW proceeds to the unitholders shall be made within
Capital Withdrawal (IDCW) / Delay in payment of IDCW	7 working days from the record date.
Delay in payment of IDC W	The IDCW proceeds will be paid by way of ECS / EFT / NEFT / RTGS
	/ Direct credits/ any other electronic manner if sufficient banking details are available with the Mutual Fund for the Unitholder.
	In the event of failure of payment of IDCW proceeds within the stipulated time of 7 working days period from the record date, the AMC shall be liable to pay interest @ 15 percent per annum calculated from the record date till the date of dispatch of IDCW proceeds, to the Unit holders.
	In case of specific request for IDCW by warrants/cheques/demand drafts or unavailability of sufficient details with the Mutual Fund, the IDCW will be paid by warrant/cheques/demand drafts and payments will be made in favour of the Unit holder (registered holder of the Units or, if there are more than one registered holder, only to the first registered holder) with bank account number furnished to the Mutual Fund.
Redemption	The redemption or repurchase proceeds shall be dispatched to the unitholders within 3 working days from the date of receipt of redemption/repurchase application, complete / in good order in all respects.
	However, pursuant to Clause 14.1.3 of SEBI Master Circular AMFI vide its communication no. AMFI/35P/MEM-COR/74/2022-23 dated January 16,2023 has provided certain exceptional circumstances wherein the additional timelines shall be applicable (please refer Statement of Additional Information "SAI" for further details.)
Bank Mandate	It is mandatory for every applicant to provide the name of the bank, branch, address, account type and number as per SEBI requirements and any Application Form without these details will be treated as incomplete. Such incomplete applications may be liable to be rejected.

	The Registrar / AMC may ask the investor to provide a blank cancelled cheque or its photocopy for the purpose of verifying the bank account number.
Delay in payment of redemption / repurchase proceeds	For detailed process in relation to bank mandate, kindly refer SAI. The redemption or repurchase proceeds shall be dispatched to the unitholders within 3 working days from the date of redemption or repurchase. However, pursuant to Clause 14.1.3 of SEBI Master Circular, AMFI vide its communication no. AMFI/35P/MEM- COR/74/2022-23 dated January 16,2023 has provided certain exceptional circumstances wherein the additional timelines shall be applicable (please refer Statement of Additional Information "SAI" for further details.)
	The AMC shall be liable to pay interest to the Unit holders @ 15% p.a. or such other rate as may be prescribed by SEBI from time to time, in case the redemption / repurchase proceeds are not dispatched within 3 working days from the date of receipt of the valid redemption/repurchase application, complete in all respects.
	However, the AMC shall not be liable to pay any interest or compensation in case of any delay in processing the redemption application beyond 3 working days, in case of any deficiency in the redemption application or if the AMC/RTA is required to obtain from the Investor/Unit holders any additional details for verification of identity or bank details or such additional information under applicable regulations or as may be requested by a Regulatory Agency or any government authority, which may result in delay in processing the application.
Unclaimed Redemption and Income Distribution cum Capital Withdrawal Amount	In accordance with Clause 14.3 of SEBI Master circular, the unclaimed redemption amount and IDCW amount that are allowed to be deployed by the Mutual Fund in call money market or money market Instruments, shall also be allowed to be invested in a separate plan of only Overnight scheme / Liquid scheme / Money Market Mutual Fund scheme floated by Mutual Funds specifically for deployment of the unclaimed amounts. Further, no exit load shall be charged in this plan and TER (Total Expense Ratio) of such plan shall be capped as per the TER of direct plan of eligible scheme(s) or at 0.50%, whichever is lower.
	Provided that such schemes where the unclaimed redemption and IDCW amounts are deployed shall be only those eligible schemes which are placed in A-1 cell (Relatively Low Interest Rate Risk and Relatively Low Credit Risk) of Potential Risk Class matrix.
	Accordingly, redemption/dividend amounts remaining unclaimed based on expiry of payment instruments will be identified periodically and amounts of unclaimed redemption/dividend would be deployed by the Scheme in the respective Unclaimed Plan(s) as follows:
	i. Mahindra Manulife Overnight Fund - Unclaimed Redemption / Income Distribution cum Capital Withdrawal (IDCW) Option Upto 3 years; and

	ii. Mahindra Manulife Overnight Fund - Unclaimed Redemption / Income Distribution cum Capital Withdrawal (IDCW) Option Beyond 3 years.
	Investors who claim these amounts during a period of three years from the due date shall be paid initial unclaimed amount along with the income earned on its deployment. Investors who claim these amounts after 3 years, shall be paid initial unclaimed amount along with the income earned on its deployment till the end of the third year. After the third year, the income earned on such unclaimed amounts shall be used for the purpose of investor education.
Disclosure w.r.t investment by minors	For further details regarding Unclaimed Plan(s), investors are requested to refer the Statement of Additional Information available on our website <u>www.mahindramanulife.com</u> . Pursuant to Clause 17.6 of SEBI Master Circular following process shall be followed for investments made on behalf of minors:
	<ul> <li>i. The minor shall be the sole Unitholder in a folio. Joint holders will not be registered.</li> <li>ii. The minor Unitholder should be represented either by a natural parent (i.e. father or mother) or by a legal guardian i.e., a court appointed guardian</li> <li>iii. Payment for investment by any mode shall be accepted from the bank account of the minor, parent or legal guardian of the minor, or from a joint account of the minor with parent or legal guardian. For existing folios, the AMCs shall insist upon a Change of Pay-out Bank mandate before redemption is processed.</li> <li>iv. Irrespective of the source of payment for subscription, all redemption proceeds shall be credited only in the verified bank account of the minor i.e. the account the minor may hold with the parent/ legal guardian after completing all KYC formalities</li> <li>v. Change of Status from Minor to Major shall be registered by AMC/Registrar post submission of the documents including KYC details, updated bank account and any such other documents as may be necessary and as desired by the AMC/Mutual Fund/Registrar, in connection with the request for Change of Status from Minor to Major.</li> </ul>
	For more information kindly read para "Investments on Behalf of Minor" and "Change of Status from Minor to Major" in Statement of Additional Information
Cash Investments in mutual funds	In order to help enhance the reach of mutual fund products amongst small investors, who may not be tax payers and may not have PAN/bank accounts, such as farmers, small traders/businessmen/workers, SEBI has permitted receipt of cash transactions for fresh purchases/ additional purchases to the extent of Rs.50,000/- per investor, per financial year shall be allowed subject to: i. compliance with Prevention of Money Laundering Act, 2002 and Rules framed there under; the SEBI Circular(s) on Anti Money Laundering (AML) and other applicable Anti Money Laundering Rules, Regulations and Guidelines; and

	ii. sufficient systems and procedures in place.
	However, payment towards redemptions, IDCW, etc. with respect to aforementioned investments shall be paid only through banking channel.
	The Fund/ AMC is currently in the process of setting up appropriate systems and procedures for the said purpose. Appropriate notice shall be displayed on its website viz. as well as at the Investor Service Centres, once the facility is made available to the investors.
Any other disclosure in terms of Consolidated Checklist on Standard Observations	Not Applicable

# **III. OTHER DETAILS**

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# A. PERIODIC DISCLOSURES

Fortnightly, Monthly and Half yearly Disclosures: Portfolio This is a list of securities	The AMC shall disclose portfolio (along with ISIN and yield of the instruments) of the Scheme in the prescribed format, as on the last day of the fortnight on its website viz. www.mahindramanulife.com within 5 days from the end of each fortnight (i.e. for the periods from 1st day of the month to the 15th day of the same month and from 16th day of the month till the last day of the same month).
where the corpus of the scheme is currently invested. The market value of these investments is also stated in portfolio disclosures advertisement.	Further, the AMC shall disclose portfolio of the Scheme along with ISIN as on the last day of each month / half year on its website viz. <u>www.mahindramanulife.com</u> and on the website of AMFI viz. <u>www.amfiindia.com</u> within 10 days from the close of each month/ half-year respectively in a user-friendly and downloadable spreadsheet format.
	In case of Unitholders whose e-mail addresses are registered, the AMC shall send via e-mail the fortnightly, monthly and half-yearly statement of the Scheme's portfolio within 5 days from the close of each fortnight and within 10 days from the close of each month/ half-year respectively. Further, the AMC shall publish an advertisement in all India edition of at least two daily newspapers, one each in English and Hindi, every half year disclosing the hosting of the half-yearly statement of the schemes' portfolio(s) on the AMC's website and on the website of AMFI. The AMC shall provide a physical copy of the statement of the Scheme portfolio, without charging any cost, on specific request received from a Unitholder.
	Please refer <u>https://www.mahindramanulife.com/downloads#mandatory-disclosures-+-Fortnightly-Debt-Portfolio-Disclosures</u> for Fortnightly Portfolio Disclosures,
	https://www.mahindramanulife.com/downloads#mandatory-disclosures-+- Monthly-Portfolio-Disclosure for Monthly Portfolio Disclosures
	and <u>https://www.mahindramanulife.com/downloads#Financials-+-Mutual-Fund-Financials-+-Half-Yearly-Unaudited-Financials-and-Portfolio-Disclosure</u> for Half yearly Portfolio Disclosures.

Half Yearly Results	The Mutual Fund shall within one month from the close of each half year (i.e. 31st March and 30th September), host a soft copy of its unaudited financial results on its website <u>www.mahindramanulife.com</u> . The Mutual Fund shall also publish an advertisement disclosing the hosting of such financial results on its website, in at least one English daily newspaper having nationwide circulation and in a newspaper having wide circulation published in the language of the region where the Head Office of the Mutual Fund is situated. The unaudited financial results shall also be displayed on the website of AMFI.
	https://www.mahindramanulife.com/downloads#Financials-+-Mutual-
	<u>Fund-Financials-+-Half-Yearly-Unaudited-Financials-and-Portfolio-</u> Disclosure for Half yearly Financial Results
Annual Report	Disclosure for Half yearly Financial Results. The scheme wise annual report shall be hosted on the website of the AMC / Mutual Fund (www.mahindramanulife.com) and AMFI (www.amfiindia.com) not later than four months (or such other period as may be specified by SEBI from time to time) from the date of closure of the relevant accounting year (i.e. 31 <sup>st</sup> March each year). Further, the physical copy of the scheme wise annual report shall be made available to the Unitholders at the registered / corporate office of the AMC at all times. In case of Unitholders whose e-mail addresses are registered with the Fund, the AMC shall e-mail the annual report or an abridged summary thereof to such Unitholders. The Unitholders whose e-mail addresses are not registered with the Fund may submit a request to the AMC / Registrar & Transfer Agent to update their email ids or communicate their preference to continue receiving a physical copy of the scheme wise annual report or an abridged summary thereof. Unitholders may also request for a physical or electronic copy of the annual report / abridged summary, by writing to the AMC at mfinvestors@mahindramanulife.com from their registered email ids or calling the AMC on the toll free number 1800 419 6244 or by submitting a written request at any of the nearest investor service centers of the Fund.
	Further, the AMC shall publish an advertisement in all India edition of at least two daily newspapers, one each in English and Hindi, every year disclosing the hosting of the scheme wise annual report on its website and on the website of AMFI. The AMC shall provide a physical copy of the abridged summary of the annual report, without charging any cost, on specific request received from a Unitholder.
	Please       refer <u>https://www.mahindramanulife.com/downloads#Financials-+-</u>
Product Labelling/ Risk-o- meter	In terms of Clause 17.4 of the SEBI Master Circular and clarifications issued by SEBI in this regard, the Mutual Fund/AMC shall evaluate the Risk-o- meter of the Scheme on a monthly basis and shall disclose the same along with portfolio disclosure of the Scheme on its website viz. <u>www.mahindramanulife.com</u> and on the website of AMFI viz. <u>www.amfiindia.com</u> within 10 days from the close of each month. Further, any change in Risk-o-meter of the Scheme or its benchmark shall be communicated by way of Notice-cum-Addendum and by way of an e-mail or SMS to unitholders of the Scheme. Further, in accordance with Clause

	5.16.1 of the SEBI Master Circular, the AMC shall disclose risk-o-meter of the scheme and benchmark wherever the performance of the Scheme vis-à-vis that of the benchmark is disclosed.
	Please refer
	https://www.mahindramanulife.com/downloads#mandatory-
	disclosures-+-Monthly-Portfolio-Disclosure for Product Labelling as
	disclosed under monthly portfolio disclosures of the Scheme.
	Further, in accordance with Clause 5.16.1 of SEBI Master Circular, the AMC shall disclose risk-o-meter of the scheme and benchmark wherever the
	performance of the Scheme vis-à-vis that of the benchmark is disclosed.
Potential Risk Class (PRC)	Pursuant to the provisions of Clause 17.5 'Potential Risk Class Matrix' of
Matrix	the SEBI Master Circular, all debt schemes are required to be classified in terms of a Potential Risk Class matrix consisting of parameters based on maximum interest rate risk (measured by Macaulay Duration (MD) of the scheme) and maximum credit risk (measured by Credit Risk Value (CRV) of the scheme). Mutual Funds are required to disclose the PRC matrix (i.e. maximum risk that a fund manager can take in a scheme) along with the mark for the cell in which the scheme resides, on the front page of initial offering application form, SID, KIM, common application form and scheme advertisements in the manner as prescribed in the said circular. The scheme(s) would have the flexibility to take interest rate risk and credit risk below the maximum risk as stated in the PRC matrix.
	Please refer the front cover page of the SID of the Scheme for the PRC matrix classification chosen by the Scheme.
	Subsequently, any change in the positioning of the Scheme into a cell resulting in a risk (in terms of credit risk or duration risk) which is higher than the maximum risk specified for the chosen PRC cell, shall be considered as a fundamental attribute change of the Scheme in terms of Regulation 18(15A) of SEBI (Mutual Fund) Regulations, 1996.
	The AMC shall inform the unitholders about subsequent PRC classification changes, if any, through SMS and by providing a link on their website referring to the said change.
	Further, the Mutual Fund/ AMC shall also publish the PRC Matrix in the scheme wise Annual Reports and Abridged summary.
Scheme Summary Document (SSD)	In accordance with SEBI letter dated December 28, 2021 and AMFI emails dated March 16, 2022 and March 25, 2022, Scheme Summary Document for all schemes of the Fund in the requisite format (pdf, spreadsheet and machine readable format) shall be uploaded on a monthly basis i.e. 15 <sup>th</sup> of every month or within 5 working days from the date of any change or modification in the scheme information on the website(s) of the Fund i.e www.mahindramanulife.com, AMFI i.e. www.amfiindia.com and Registered Stock Exchanges i.e. National Stock Exchange of India Limited and BSE Limited.
	Please       refer <u>https://www.mahindramanulife.com/downloads#mandatory-</u>

# B. TRANSPARENCY/NAV DISCLOSURES (DETAILS WITH REFERENCE TO INFORMATION GIVEN IN SECTION I)

This is the value per unit of the scheme on a particular day. You can ascertain the value of your investments by multiplying the NAV with your unit balance.

The AMC will calculate and disclose the NAVs on all the Business Days. The AMC shall update the NAVs on its website (www.mahindramanulife.com) and of the Association of Mutual Funds in India - AMFI (www.amfiindia.com) before 11.00 p.m. on every Business Day. Further, in case NAV of Corporate Debt Market Development Fund ("CDMDF") units is not available by 9:30 p.m. of same Business Day, NAV declaration timing shall be 10 a.m. on next Business Day instead of 11 p.m. on same Business Day. In case of any delay, the reasons for such delay would be explained to AMFI in writing. If the NAVs are not available before the commencement of Business Hours on the following day (or following day of the next Business Day, if applicable) due to any reason, the Mutual Fund shall issue a press release giving reasons and explaining when the Mutual Fund would be able to publish the NAV.

Unitholders may also avail a facility of receiving latest NAVs through SMS on their registered mobile numbers, by submitting a specific request in this regard to the AMC / Registrar & Transfer Agent.

# C. TRANSACTION CHARGES AND STAMP DUTY

### **Transaction Charges:**

In accordance with clause 10.5 of SEBI Master Circular, the AMC/ Fund shall deduct a Transaction Charge on per purchase /subscription of Rs. 10,000/- and above, as may be received from new investors (an investor who invests for the first time in any mutual fund schemes) and existing investors. The distributors shall have an option to either "Opt-in / Opt-out" from levying transaction charge based on the type of product. Therefore, the "Opt-in / Opt-out" status shall be at distributor level, basis the product selected by the distributor.

However, investors are requested to note that, pursuant to Addendum No. 17/2023 dated April 26, 2023, it was decided by the AMC to discontinue the payment of transaction charges to the distributors. Accordingly, no transaction charges shall be deducted from the investment amount for transactions/applications received from the investor and routed through any mutual fund distributor (i.e., for investment in Regular Plan) and the entire subscription amount will be invested in the Scheme.

# **Stamp Duty:**

Pursuant to Notification No. S.O. 4419(E) dated December 10, 2019 and subsequent notifications issued in this regard, by Department of Revenue, Ministry of Finance, Government of India, read with Part I of Chapter IV of Notification dated February 21, 2019 issued by Legislative Department, Ministry of Law and Justice, Government of India on the Finance Act, 2019:

i. a stamp duty @ 0.005% of the transaction value would be levied on all mutual fund purchase transactions (including fresh / additional purchases, switch-in transactions, all SIP / STP-in instalments and IDCW re-investments) at the time of allotment of units;

Pursuant to levy of stamp duty, the number of units allotted on such purchase transactions to the unitholders would be reduced to that extent.

ii. a stamp duty @0.015% of the transaction value would be levied on transfer of mutual fund units.

Further, it is hereby clarified that stamp duty shall not be levied on redemption of units by unitholders.
## D. ASSOCIATE TRANSACTIONS

Please refer to Statement of Additional Information (SAI)

## E. TAXATION:

For details please refer to clause on Taxation in SAI apart from the following:

Mahindra Manulife Mutual Fund is a Mutual Fund registered with the Securities and Exchange Board of India and hence the entire income of the Mutual Fund is exempt from the Income tax in accordance with the provisions of section 10(23D) of the Income Tax Act, 1961 ('the Act').

The following summary outlines the key tax implications applicable to unit holders based on the relevant provisions under the Act and on the understanding of current tax legislations.

### **Category of this Scheme:**

As the Scheme shall be primarily investing in debt and money market securities, the Scheme shall be classified as "Debt scheme -Specified Mutual Fund" (in case units are acquired on or after April 01, 2023). The Scheme shall be classified as Debt scheme - other than Specified Mutual Fund in case units were acquired before April 01, 2023, as per the provisions mentioned in the Act.

"Specified Mutual Fund" means (a) Mutual Funds which invests more than 65 per cent of its total proceeds in debt and money market instruments; or (b) a fund which invests 65 per cent or more of its total proceeds in units of a fund referred to in above sub-clause (a). The gains/losses from units of Specified Mutual Fund would be deemed to be short term capital gain/loss irrespective of period of holding. This is applicable for all such units which are acquired on or after Apr 1, 2023.

Category of Units	<b>Resident Investors</b>	Non-Resident Investors
Units of Specified Mutual Fund Schemes acquired on or after 1 April 2023		
Capital Gain (Short	Taxable at normal	In respect of non-resident
term -irrespective of	rates of tax applicable	non corporate, taxable at
period of holding)	to the unitholder.	normal rates of tax
		applicable to the unitholder.
		In respect of non-resident
		corporate – 35%%
Units of Debt schemes i.e. other than Equity Oriented Schemes and Units		
of Specified Mutual Fu	nd (acquired on or afte	r 1 April 2023).
Short Term Capital	Taxable at normal	In respect of non-resident
Gain (period of holding	rates of tax applicable	non corporate, taxable at
less than or equal to 24	to the unitholder.	normal rates of tax
months^)		applicable to the unitholder.
	Resident Companies:	In respect of non-resident
	30%/25%\$/ 22%\$	corporate – 35%
	/15%\$	
Long Term Capital	12.50% without	12.50% without indexation
Gain (period of holding	indexation (u/s 112)	(u/s 112)
more than 24 months^)		
Dividend / Income	Taxable at normal	In respect of non-resident
distribution by mutual	rates of tax applicable	non corporate, taxable at
fund	to the unitholder.	_

#### I) Income Tax Rates (\*)

Resident Companies*: 30%/25%\$/ 22%\$ / 15%\$	normal rates of tax applicable to the unitholder. In respect of non-resident corporate – 35%. If units are purchased in foreign currency, taxable @ 20% under section 115A for both.
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#### II) TDS Rates \*\*

Category of Units	Resident Investors	Non-Resident Investors *
Units of Specified Mutual Fund Schemes acquired on or after 1 April 2023		
Capital Gain (Short term -	Nil	30% for non-residents non
irrespective of period of		corporates, 35% for non-
holding)		resident corporates (u/s 195)
Units of Debt scheme i.e other than Equity Oriented Schemes and units of		
Specified Mutual Fund (ac	quired on or after 1	April 2023).
Short Term Capital Gain	Nil	30% for non-residents non
(period of holding less than		corporates, 35% for non-
or equal to 24 months^)		resident corporates (u/s 195)
Long Term Capital Gain	Nil	12.50% without indexation
(period of holding more		(u/s 112)
than 24 months^)		
Dividend / Income	10%	20%
distributed by mutual fund		

(\*) plus surcharge and Health & Education Cess ('HEC') as applicable: - The applicable HEC rate is 4% on income-tax and surcharge.

^ for mutual fund units listed on recognised stock exchange, period of holding of 12 months for nature of gain (short term or long term) is to be considered.

#### The applicable surcharge rate is:

#### a. In case of Companies: -

Net Income	Domestic companies @	Foreign Companies
Above Rs 1 crore and upto Rs 10 crore	7%	2%
Above Rs 10 crore	12%	5%

@ - Surcharge at the flat rate of 10% to be levied on income tax for the companies opting for lower rate of tax under section 115BAA or 115BAB.

b. In case of Individuals/HUFs/BOIs/AOPs and Artificial juridical persons (other than co-operative society) under section 115BAC (i.e., new tax regime): -

Net Income	Surcharge on amount of	Surcharge on
	income tax on dividend	amount of income
	income and income which is	tax on other
	taxable under section 111A,	incomes
	112 and 112A of the Act	
Above Rs 50 lakh and upto Rs 1 crore	10%	10%
Above Rs 1 crore and upto Rs 2 crore	15%	15%
Above Rs 2 crore	15%	25%

c. In case of Individuals/HUFs/BOIs/AOPs and Artificial juridical persons under old tax regime: -

Net Income	Surcharge on amount of	Surcharge on
	income tax on dividend	amount of income
	income and income which is	tax on other
	taxable under section 111A,	incomes
	112 and 112A of the Act	
Above Rs 50 lakh and upto Rs 1 crore	10%	10%
Above Rs 1 crore and upto Rs 2 crore	15%	15%
Above Rs 2 crore and upto Rs 5 crore	15%	25%
Above Rs 5 crore	15%	37%

- d. In case of firms, and local authorities, @ 12% (if their net income exceeds Rs. 1 crore).
- e. In case of co-operative society (other than resident co-operative society opting under section 115BAD)
  @ 7% (if their net income exceeds Rs. 1 crore but does not exceed 10 core) and @12%, where net income exceeds 10 crore. In case of resident co-operative society opting under section 115BAD, @10%.
- f. The marginal relief in case of surcharge is also applicable.

\$ - The applicable tax rates are as under: -

a. A domestic company is taxable at the rate of 30%. However, tax shall be levied at 25% if the total turnover or gross receipts for the financial year 2023-24 does not exceed Rs. 400 crores.

b. A domestic company can opt for new tax regime provided under section 115BA (taxable at 25% with surcharge and cess) or section 115BAA (taxable at 22% with reduced surcharge rate of 10% on income tax and 4% health & education cess on income tax and surcharge) or section 115BAB (taxable at 15% with reduced surcharge rate of 10% on income tax and 4% health & education cess on income tax and 4% health & education cess on income tax and surcharge).

\*\* The higher rate of TDS may apply in following cases: -

1. As per Section 206AA, a recipient who fails to furnish PAN to the person making a payment would suffer TDS at the higher rate of 20%. This requirement would not apply to such non-resident recipient if the details and documents are furnished to the payer under Rule 37BC inserted vide Notification No. 53/2016.

2. PAN Aadhaar linking: TDS at the higher rate of 20% shall be applicable in case PAN and Aadhaar is not linked.

For further details on taxation, please refer to the Section on 'Taxation on investing in Mutual Funds' in 'Statement of Additional Information ('SAI'). Investors should be aware that the fiscal rules/ tax laws may change and there can be no guarantee that the current tax position may continue indefinitely.

#### F. RIGHTS OF UNITHOLDERS:- Please refer to SAI for details.

### G. LIST OF OFFICIAL POINTS OF ACCEPTANCE

For Details of official points of acceptance, kindly refer <u>https://www.mahindramanulife.com/downloads#MANDATORY-DISCLOSURES-+-Offer-</u> Document-Related-Disclosures

### H. PENALTIES, PENDING LITIGATION OR PROCEEDINGS, FINDINGS OF INSPECTIONS OR INVESTIGATIONS FOR WHICH ACTION MAY HAVE BEEN TAKEN OR IS IN THE PROCESS OF BEING TAKEN BY ANY REGULATORY AUTHORITY

For detailed disclosure on Penalties, Pending Litigation Or Proceedings, Findings Of Inspections Or Investigations please refer <u>https://www.mahindramanulife.com/downloads#MANDATORY-DISCLOSURES-+-Offer-Document-Related-Disclosures</u>

The Scheme under this Scheme Information Document was approved by the Board of Directors of Mahindra Manulife Trustee Private Limited (Trustee to Mahindra Manulife Mutual Fund) on December 5, 2017. The Trustee has ensured that the Scheme is a new product offered by Mahindra Manulife Mutual Fund and is not a minor modification of its existing schemes.

Notwithstanding anything contained in this Scheme Information Document, the provisions of the SEBI (Mutual Funds) Regulations, 1996 and the guidelines there under shall be applicable.

For and on behalf of

Mahindra Manulife Investment Management Private Limited

Sd/-Anthony Heredia Managing Director & Chief Executive Officer

Date: May 26, 2025

## LIST OF BRANCH OFFICES OF MAHINDRA MANULIFE INVESTMENT MANAGEMENT PRIVATE LIMITED

### For updated list of AMC branch offices, please visit www.mahindramanulife.com

# LIST OF OFFICIAL POINTS OF CONTACTS / ACCEPTANCE OF TRANSACTIONS DURING NEW FUND OFFER & ONGOING OFFER PERIOD

## OFFICES OF MAHINDRA MANULIFE INVESTMENT MANAGEMENT PRIVATE LIMITED:

Mumbai-HO	Unit No. 204, 2 <sup>nd</sup> Floor, Amiti Building, Piramal Agastya Corporate Park, LBS Road,	
	Kamani Junction, Kurla (W), Mumbai – 400 070	
Mumbai	Shop No 16 & 17, Ground Floor, Star Trade Center, Opposite Chamunda	
Borivali	Cirle,Sodawala Lane, Borivali – West, Mumbai – 400092	
Mumbai	ZBS 2 FLR 201, Mahatma Gandhi Road, Near Doshi Nursing Home, Ghatkopar East,	
Ghatkopar	Mumbai, Maharashtra 400077	
Mumbai -	103, Veena Chambers, 21, Dalal Street, Opp. BSE Building, Fort, Mumbai- 400001	
Fort		
Mumbai -	Shop No. 5, Konark Tower, Ghantali Devi Road, Thane West, Thane - 400602	
Thane		
New Delhi	608-609, 6th Floor, Prakash Deep Building, Tolstoy Marg, New Delhi - 110001	
Pune	Office No. 4, 1st Floor, Dinkar Baug Apartment, CTS No 852, FP No.188,	
	Bhandarkar Road,Pune – 411004	
Lucknow	101, First Floor, Bhalla Chambers, 10 Park Lane, 5 Park Road, Hazratganj, Lucknow	
	- 226001.	
Ahmedabad	202, 2 <sup>nd</sup> Floor, Majestic, Near Swati Snacks, Opp. Law Garden BRTS, Law Garden,	
	Panchvati, Ahmedabad – 380006.	
Vadodara	342, 343 & 347, 3 <sup>rd</sup> Floor, Emreald One, Nr. Gujarat Kidney Hospital, Jetalpur Bridge,	
	Jetalpur Road, Vadodara – 390007.	
Kolkata	403 Kankaria Centre, 2/1 Russel Street, Kolkata 700 071	
Chennai	Suite 1B, 1st Floor, Riaz Garden, No.29 Kodambakkam High Road, (Near Hotel Palm	
	Grove) Nungambakkam, Chennai 600 034	
Bangalore	S - 317, 319, 321 ,3 <sup>rd</sup> Floor, South Block, Manipal Center, 47, Dickenson Road,	
	Bangalore – 560042.	
Patna	609, 6th Floor, Hari Niwas Complex, Dakbunglow Crossing, Patna- 800 001.	
Ernakulam	New Door No: 66/4588, 3rd Floor, MG Square, Padma Jn, MG Road. Ernakulam –	
	682035	
Indore	215/215-A, 2nd Floor, D M Tower, Near Janjeerwala Sqaure, 21/2,	
	Race Course Road, New Palasia, Indore – 452 001	
Surat	HG-17, International Trade Center, Majura Gate, Surat – 395002	
Jaipur	Office No. 115, 1 <sup>st</sup> Floor V-Jai City Point, Ashok Marg, C-Scheme, Jaipur – 302001.	
Guwahati	5E, Dihang Arcade, 5th Floor, Tarun Nagar, Near ABC Bus Stop, G. S. Road,	
	Guwahati – 781005	
Kanpur	Office No. 411, 4th Floor, Kan Chambers Civil Lines, Kanpur-208001	
Chandigarh	SCO 333-334, 1st Floor, Cabin No - 216, Sector - 35B, Chandigarh - 160022	
West Bengal	Room No - 21, 3rd Floor, Suhatta Mall, City Centre, Durgapur 713216	
-Durgapur		
Nagpur	1st Floor, Plot No 6, Fortune Business Centre, Vasant Vihar Complex, WHC Road,	
	Shankar Nagar, Nagpur, 440010	

Hyderabad	3B, Third Floor, B-Block, GS Mall, Somajiguda Circle, Above Domino's Pizza,
	Hyderabad, Telangana-500082.
Chhattisgarh	Shop No. F-12, 1st Floor Raheja Towers, Opp. Crime Branch, Near Fafadih Chowk,
	Jail Road, Raipur, Chhattisgarh – 492001
Dehradun	3rd Floor, Soshil Tower, Curzon Road, Near Dalanwala Thana, Dehradun - 248001

#### **OFFICES OF COMPUTER AGE MANAGEMENT SERVICES LIMITED**

Andhra Pradesh: 40-1-68, Rao & Ratnam Complex, Near Chennupati Petrol Pump, M.G Road, Labbipet, Vijayawada - 520010. Flat No GF2, D NO 47-3-2/2, Vigneswara Plaza, 5th Lane, Dwarakanagar Visakhapatnam- 530 016. D No 31-13-1158, 1st Floor, 13/1 Arundelpet, Ward No. 6, Guntur - 522002. Shop No. 2, 1st Floor, NSR Complex, James Garden, Near Flower Market, Nellore - 524001. Door No: 6-2-12, 1st Floor, Rajeswari Nilayam, Near Vamsikrishna Hospital, Nyapathi Vari Street, T Nagar, Rajahmundry - 533101. Shop No: 6, Door No: 19-10-8, (Opp to Passport Office), AIR Bypass Road, Tirupati - 517501. Bandi Subbaramaiah Complex, D. No: 3/2151/2152, Shop No 4, Near Food Nation, Raja Reddy Street, Kadapa - 516001. AGVR Arcade, 2<sup>nd</sup> Floor, Plot No. 37(Part), Layout No. 466/79 Near: Canara Bank, Sangamesh Nagar, Anantpur – 515001. H.No. Shop Nos. 26 and 27, Door No. 39/265A and 39/265B, Second Floor, Skanda Shopping Mall, Old Chad Talkies, Vaddageri, 39th Ward, Kurnool – 518 001. No.33-1, 44 Sri Sathya Complex, Main Road, Kakinada - 533001. Door No 4-4-96, 1st Floor, Vijaya Ganapathi Temple Back Side, Nanubala Street, Srikakulam - 532001. No.22b-3-9, Karl Marx Street, Powerpet, Eluru - 534002. Shop No 1128, First floor, 3rd Line, Sri Bapuji Market Complex, Ongole 523001.Door No. 4-8-73, Beside Sub Post Office, Kothagraharam, Vizianagaram - 535001 Assam: Piyali Phukan Road, K. C. Path, House No -1, Rehabari, Guwahati - 781008. Bangiya Vidyalaya RoadNear Old post office, Durgabari, Tinsukia - 786125. G.N.B.Road, Bye Lane, Prakash Cinema, Po & Dist. Bongaigaon -783380. Amba Complex, Ground Floor, H S Road, Dibrugarh-786001. Singh Building, Ground Floor, C/O-Prabhdeep Singh Punjabi Gali, Opp. V-Mart, Gar Ali, PO & PS-Jorhat, Jorhat -785001 Utaplendu Chakraborthy, Amulapathy, V.B.Road, House No.315, Nagaon -782003. House No. 18B, 1st Floor, C/o. Lt. Satyabrata Purkayastha, Opposite to Shiv Mandir, Ambicapatty, Silchar -788004. Kanak Tower -1st Floor Opp. IDBI Bank/ ICICI Bank C.K. Das Road, Tezpur Sonitpur - 784001 Bihar: 301-B, Third Floor, Patna One Plaza, Near Dak Bungalow Chowk, Patna – 800001. Brahman Toli, Durgasthan Gola Road, Muzaffarpur - 842001. Ground Floor, Gurudwara Road, Near Old Vijaya Bank, Bhagalpur -812001. Ground Floor, Belbhadrapur, Near Sahara Office, Laheriasarai Tower Chowk, Laheriasarai, Darbhanga - 846001, Old NCC Office, Ground Floor, Club Road, Arrah-802301. R-C Palace, Amber Station Road, Opp Mamta Complex, Biharsharif - 803101. C/o Sri Vishwanath Kunj Ground Floor, Tilha Mahavir Asthan Gaya -823001. C/C Muneshwar Prasad, Sibaji Colony, SBI Main Branch Road, Near - Mobile Tower, Purnea-854301. C/o Rice Education and IT Centre, Near Wireless Gali, Amla Tola, Katihar-854105. Chattisgarh: First Floor, Plot No. 3, Block No. 1, Priyadarshini Parisar West, Behind IDBI Bank Nehru Nagar, Bhilai - 490020. HIG, C-23 Sector - 1, Devendra Nagar, Raipur -492004. Shop No. B - 104, First Floor, Narayan Plaza, Link Road, Bilaspur - 495001 Goa:Office no 103, 1st Floor, Unitech City Centre, M.G. Road, Panaji - 403 001. F4- Classic Heritage, near Axis Bank, Opp. BPS Club, Pajifond Margao - 403601. Office no. CF-8, 1st Floor, Business Point, Above Bicholim Urban Co-op Bank, Angod, Mapusa - 403507. No DU 8, Upper Ground Floor, Behind Techoclean Clinic, Suvidha Complex Near ICICI Bank, Vasco - 403802. 1st Floor, MIG-25, Blessed Villa, Lochan Nagar, Raigarh-496001. Gujarat: 111- 113, 1st Floor - Devpath Building, Off C G Road, Behind Lal Bungalow, Ellis Bridge, Ahmedabad - 380006. Shop No-G-5, International Commerce Center, Nr. Kadiwala School, Majura Gate, Ring Road, Surat -395002. 103 Aries Complex, BPC Road, Off R.C.Dutt Road, Alkapuri, Vadodara - 390007. 101, A.P. Tower, B/H, Sardhar Gunj, Next to Nathwani Chambers, Anand - 388001.501 - 503, Bhayani Skyline, Behind Joggers Park, Atabhai Road, Bhavnagar - 364001 . 207, Manek Centre, P N Marg, Jamnagar - 361001. Office 207 - 210, Everest Building, Harihar Chowk, Opp Shastri Maidan, Limda Chowk, Rajkot - 360001. 3rd floor, Gita Nivas, Opp Head Post Office, Halar Cross Lane, Valsad - 396001. 214-215,2nd floor, Shivani Park, Opp. Shankheswar Complex, Kaliawadi, Navsari –396445. Office No. 4-5, First Floor RTO, Relocation Commercial Complex –B Opp. Fire Station, Near RTO Circle, Bhuj -370001. "Aastha Plus", 202-A, 2nd Floor, Sardarbag Road, Near. Alkapuri, Opp. Zansi Rani Statue, Junagadh - 362001. Shop No - F - 56, First Floor, Omkar Complex, Opp Old Colony, Near Valia Char Rasta, GIDC, Ankleshwar -393002. 1st Floor, Subhadra Complex, Urban Bank Road, Mehsana - 384002. 208, 2nd Floor, HEENA ARCADE, Opp. Tirupati Tower, Near G.I.D.C. Char Rasta, Vapi - 396195. F-108, A-111, First Floor, R K Casta, Behind Patel Super Market, Station Road, Bharuch -392001. F-142, First Floor, Ghantakarna Complex, Gunj Bazar, Nadiad - 387001. A/177, Kailash Complex, Opp. Khedut Decor Gondal - 360311. Shyam Sadan, First Floor, Plot No 120, Sector 1/A, Gandhidham -370201. Unit No. 326, Third Floor, One World - 1, Block - A, Himmatnagar - 383001. Gopal Trade Center, Shop No. 13-14, 3rd Floor, Nr. BK Mercantile Bank, Opp. Old Gunj, Palanpur -385001. Shop No. 12, M.D. Residency, Swastik Cross Road, Surendranagar - 363001. B 1, 1st Floor, Mira Arcade, Library Road, Opp SBS Bank, Amreli-365601. F-10, First Wings, Desai Market, Gandhi Road, Bardoli-394601. No.507, 5Th Floor, Shree Ugati Corporate Park, Opp Pratik Mall, Nr Hdfc Bank, Kudasan, Gandhinagar-382421. 1st Floor, Prem Praksh TowerB/H B.N. Chambers, Ankleshwar, Mahadev Road, Godhra - 389001. Haryana: LG3, SCO 12 Sector 16, Behind Canara Bank, Faridabad – 121002. Unit No-115, First Floor Vipul Agora Building Sector -28, Mehrauli Gurgaon Road Chakkar Pur, Gurgaon - 122001. SCO 83-84, First Floor, Devi Lal Shopping Complex, Opp RBL Bank, G.T.Road, Panipat - 132103. SCO 06, Ground Floor, MR Complex, Near Sonipat Stand Delhi Road, Rohtak-124 001. 124-B/R, Model Town, Yamuna Nagar - 135001. 12, Opp. Bank of Baroda, Red Square Market, Hisar - 125001. Opposite Peer, Bal Bhawan Road, Ground Floor, Ambala - 134 003. M G Complex, Bhawna Marg, Beside Over Bridge, Sirsa - 125055. 29, Avtar Colony, Behind Vishal Mega Mart, Karnal - 132001. SCO-12, 1st Floor, Pawan Plaza, Atlas Road, Subhas Chowk, Sonepat-131001. Himachal Pradesh: I Floor, Opp. Panchayat Bhawan Main gate, Bus stand, Shimla - 171001. 1st Floor, Above Sharma General Store, Near Sanki Rest house, The Mall, Solan - 173212. Collage Road, Kangra, Dis Kangra-176001. No.328/12, Ram Nagar, 1st Floor, Above Ram Traders, Mandi-175001. Jammu & Kashmir: JRDS Heights, Lane Opp. S&S Computers, Near RBI Building, Sector 14, Nanak Nagar Jammu - 180004. Guru Nanak Institute NH-1A,Udhampur - 182101. Near New ERA Public School, Rajbagh, Srinagar, Jammu & Kashmir - 190008. Jharkhand: 1st Floor, Plot No. HE-7 City Centre, Sector 4, Bokaro Steel City, Bokaro- 827004. Urmila Towers, Room No: 111 (1st Floor) Bank More, Dhanbad - 826001. Tee Kay Corporate Towers, 3rd Floor, S B Shop Area, Main Road, Bistupur, Jamshedpur. 4, HB RoadNo: 206, 2nd Floor Shri Lok Complex, H B Road, Near Firavalal, Ranchi - 834001. S S M Jalan Road, Ground floor, Opp. Hotel Ashoke, Caster Town, Deoghar - 814112. Municipal Market, Annanda Chowk, Hazaribag - 825301. AT; Gram-Gutusahi Under the Nimdih, Panchayat, PO Chaibasa, Thana: Muffasil, Dist-West Singhbhum, Jharkhand – 833201. Karnataka: Trade Centre, 1st Floor45, Dikensen Road (Next to Manipal Centre), Bengaluru - 560042.14-6-674/15(1), SHOP No - UG11-2, Maximus Complex, Light House Hill Road, Mangalore- 575001. Classic Complex, Block no 104, 1st Floor, Saraf Colony, Khanapur Road, Tilakwadi, Belgaum - 590 006. 13, Ist Floor, Akkamahadevi Samaj Complex, Church Road, P.J.Extension, Davangere - 577002. No.204 - 205, 1st Floor' B ' Block, Kundagol Complex, Opp. Court, Club Road, Hubli - 580029. No.1, 1st Floor, CH.26 7th Main, 5th Cross (Above Trishakthi Medicals), Saraswati Puram, Mysore - 570009. 18/47/A, Govind Nilaya, Ward No 20, Sangankal Moka Road, Gandhinagar, Bellary - 583102. No.65, 1st Floor, Kishnappa Compound, 1st Cross, Hosmane Extn, Shimoga - 577201. Pal Complex, Ist Floor, Opp. City Bus Stop, SuperMarket, Gulbarga - 585101. Shop No A2, Basement Floor, Academy Tower, Opp. Corporation Bank, Manipal – 576104. First Floor, 17/1, (272) 12th Cross Road, Wilson Garden, Bengaluru-560027. Shop No.02 1st Floor, Shreyas Complex, near Old Bus Stand Bagalkot – 587101. Padmasagar Complex, 1<sup>st</sup> floor, 2<sup>nd</sup> Gate, Ameer Talkies Road, Vijayapura (Bijapur) - 586101. Vidya Bhavan Building, 1st Floor, Old Bus Stand Road, Hassan - 573201. PID No 88268, 2nd Floor, 2nd Cross, M G Road, Tumkur-572101 Kerala: Building Name: - Modayil Doorx No. :- 39/2638 DJ, 2nd Floor, 2A, M. G. Road, Cochin - 682 016, Door No.42/227-B, Chittoor Road, Opp. North Town Police Station, Kacheripadym, Cochin - 682018. 29/97G 2nd Floor, S A Arcade, Mavoor Road, Arayidathupalam, Calicut - 673016. 1307 B, Puthenparambil Building KSACS Road, Opp. ESIC office Behind Malayala Manorama Muttambalam P O, Kottayam 686501. Room No. 26 & 27, Dee Pee Plaza, Kokkalai, Trichur - 680001. TC NO: 22/902, 1st - Floor "Blossom" Bldg., Opp. NSS Karayogam Sasthamangalam Village P.O, Thiruvananthapura Trivandrum-695010 Uthram Chambers (Ground Floor) Thamarakulam, Kollam - 691 006. Room No.PP.14/435, Casa Marina Shopping Centre, Talap, Kannur - 670004. Door No.18/507(3) Anugraha, Garden Street, College Road, Palakkad -678 001. 1st Floor, Room No - 61(63) International Shopping Mall, Opp. St. Thomas Evangelical Church, Above Thomson Bakery, Manjady, Thiruvalla – 689105. Doctor's Tower Building, Door No. 14/2562, 1st floor, North of Iorn Bridge, Near Hotel Arcadia Regency, Alleppey - 688001. KMC XXv/88, I, 2nd Floor, Stylo Complex, Above Canara Bank, Bank Road, Kasaragod-671121. Kadakkadan Complex, Opp central school, Malappuram-676505. 2nd Floor, AFFAS Building, Kalpetta, Wayanad-673121.Madhya Pradesh: 101, Shalimar Corporate Centre8-B, South Tukogunj, Opp.Greenpark, Indore - 452001. Plot no 10, 2nd Floor, Alankar Complex, Near ICICI Bank, MP Nagar, Zone II, Bhopal - 462011. G-6 Global Apartment, Kailash Vihar Colony, Opp. Income Tax Office, City Centre, Gwalior - 474002. 8, Ground Floor, Datt Towers, Behind Commercial Automobiles, Napier Town, Jabalpur - 482001.2nd Floor, Parasia Road, Near Surva Lodge, Sood Complex, Above Nagpur CT Scan, Chhindwara – 480001. 1st Floor, Gurunanak Dharmakanta, Jabalpur Road, Bargawan, Katni - 483501. Dafria & Co, No.18, Ram Bagh, Near Scholar's School, Ratlam - 457001. Opp. Somani Automobile, S Bhagwanganj Sagar - 470002. 109, 1st Floor, Siddhi Vinayak Trade Center, Shahid Park, Ujjain – 456010. 11 Ram Nagar - 01st Floor, A. B. Road, Near Indian- Allahabad Bank, Dewas – 455001. 1st Floor, Shri Ram Market, Beside Hotel Pankaj, Satna-485001. Shop No 112, First Floor, Anant Vaibhav, University Road, Rewa -486001. Maharashtra: Rajabahdur Compound, Ground Floor, Opp Allahabad Bank, Behind ICICI Bank, 30, Mumbai Samachar Marg, Fort, Mumbai - 400023. 501 - Tiara, CTS 617, 617/1-4,Off Chandavarkar Lane, Maharashtra Nagar, Borivali – West, Mumbai – 400092. 145, Lendra, New Ramdaspeth, Nagpur - 440010. Vartak Pride, 1st floor, Survay No 46, City Survay No 1477, Hingne Budruk, D. P Road, Behind Dinanath Mangeshkar Hospital, Karvenagar, Pune - 411 052. 81, Gulsham Tower, 2nd Floor 81, Gulsham Tower, 2nd Floor 81, Near Panchsheel Talkies, Amaravati - 444601. 2nd Floor, Block No. D-21-D-22, Motiwala Trade Center, Nirala Bazar, New Samarth Nagar, Opp. HDFC Bank, Aurangabad - 431001. Rustomji Infotech Services, 70, Navipeth, Opp. Old Bus Stand, Jalgaon - 425001. 2 B, 3rd Floor, Ayodhya Towers, Station Road, Kolhapur - 416001.1st Floor, "Shraddha Niketan", TilakWadi, Opp. Hotel City Pride, Sharanpur Road, Nasik - 422 002. Flat No 109, 1st FloorA Wing, Kalyani Tower, 126 Siddheshwar Peth, Near Pangal High School, Solapur - 413001. 117 / A / 3 / 22, Shukrawar Peth, Sargam Apartment, Satara - 415002. Opp. RLT Science College, Civil Lines, Akola - 444001. Dev Corpora, 1st floor, Offce no. 102, Cadbury Junction, Eastern Express way, Thane (West) – 400 601.351, Icon, 501,

5th floor, Western Express Highway, Andheri East, Mumbai - 400069. Jiveshwar Krupa Bldg, Shop. NO.2, Ground Floor, Tilak Chowk, Harbhat Road, Sangli - 416416. Shop No 6, Ground Floor, Anand Plaza Complex, Bharat Nagar, Shivaji Putla Road, Jalna - 431203. 3, Adelade Apartment, Christain Mohala, Behind Gulshan-E-Iran Hotel, Amardeep Talkies Road, Bhusawal - 425201.Office no 3, 1st Floor, Shree Parvati, Plot no 1/175, Opp. Mauli Sabhagruh, Zopadi Canteen, Savedi, Ahmednagar - 414 003. House No 3140, Opp Liberty Furniture, Jamnalal Bajaj Road, Near Tower Garden, Dhule - 424001. Orchid Tower, Gr'Floor, Gala No 06, S.V.No.301/Paiki 1/2, Nachane Munciple Aat, Arogya Mandir, Nachane Link Road, At, Post, Tal. Ratnagiri, Dist. Ratnagiri - 415612. Pushpam, Tilakwadi, Opp. Dr. Shrotri Hospital, Yavatmal -445001.BSEL Tech Park, B-505, Plot no 39/5 & 39/5A, Sector 30A, Opp. Vashi Railway Station, Vashi, Navi Mumbai - 400705. Platinum Mall, Office No.307, 3rd floor, Jawahar Road, Ghatkopar East, February 22, 2018 Mumbai 400 077. Opp Mustafa décor, Behind Bangalore Bakery, Kasturba Road, Chandrapur – 442402. Shop No.8,9 Cellar "Raj Mohammed Complex" Main Road Shri Nagar, Nanded-431605. Opp. Raman Cycle Industries, Krishna Nagar, Wardha -442001. Office No 413, 414, 415, 4th Floor, Seasons Business Centre, Opp. KDMC (Kalyan Dombivli Municipal Corporation) Shivaji Chowk, Kalyan (W) - 421 301. Shop No. 5 & 6, B2B Elite, Ground Floor, Near Deshikendra School, Signal Camp, Latur, Maharashtra - 413512. 12/179, Bairagdar Building, Behind Congress Committee Office, Ichalkaranji - 416115. Meghalaya: 3rd Floor RPG Complex, Keating Road, Shillong - 793001 Nagaland: MM Apartment, House No.436(Ground Floor), Dr. Hokeshe Sema Road, Near Bharat Petroleum, Opp. T.K.Complex, Dimapur -797112.New Delhi: 401 to 404, 4th Floor, Kanchan Junga Building, Barakhamba Road, New Delhi 110001. Number G-8, Ground Floor, Plot No C-9, Pearls Best Height - II, Netaji Subhash Place, Pitampura, New Delhi – 110034. Office Number 112, 1st Floor, Mahatta Tower, B Block Community Centre, Janakpuri, New Delhi -110058 Odisha: Plot No-501/1741/1846, Premises No-203, 2nd Floor, Kharvel Nagar, Unit-3, Bhubaneswar-751001. Ground Floor, Kalika Temple Street, Beside SBI Bazar Branch, Berhampur- 760 002. Near Indian Overseas Bank, Cantonment Road, Mata Math, Cuttack - 753001. J B S Market Complex, 2nd Floor, Udit Nagar, Rourkela -769012. C/o Raj Tibrewal & Associates, Opp. Town High School, Sansarak Sambalpur - 768001. B C Sen Road, Balasore - 756001. Similipada, Near Sidhi Binavak +2 Science Collage, Angul-759122. Das & Das Complex, 1st Floor, Bypass Road, opposite to Vishal Mega Mart, Chhapulia, Bhadrak, Odisha. PIN-756100. Darji Pokhari Chakka, Above om Jewellers, Hospital Square, Puri Town, Puri-752001. Pondicherry: S-8, 100, Jawaharlal Nehru Street (New Complex, Opp. Indian Coffee House), Pondicherry - 605001. Punjab: Deepak Tower, SCO 154-155, 1st Floor-Sector 17, Chandigarh - 160017. U/GF, Prince Market, Green Field, Near Traffic Lights, Sarabha Nagar Pulli, Pakhowal Road, Ludhiana - 141002. 3rd Floor Bearing Unit no- 313, Mukut House, Amritsar – 143001. 144, Vijay Nagar, Near Capital Small Finance Bank, Football Chowk Jalandhar City – 144001.35 New Lal Bagh, Opposite Polo Ground, Patiala: 147001. 2907 GH, GT Road, Near Zila Parishad, Bhatinda - 151001. Near Archies Gallery, Shimla Pahari Chowk, Hoshiarpur - 146001.Street No 8-9 Center, Aarya Samaj Road, Near Ice Factory, Moga -142001. Opp Bank of Bikaner and Jaipur, Harchand Mill Road, Motia Khan, Mandi Gobindgarh -147301. 13 - A, Ist Floor, Gurjeet Market, Dhangu Road, Pathankot -145001. Shop No.2, Model Town, Near Joshi Driving School, Phagwara-144401. Rajasthan: R-7, Yudhisthir Marg, C-Scheme, Behind Ashok Nagar Police Station, Jaipur - 302001. AMC No. 423/30 Near Church, Opp T B Hospital, Jaipur Road, Ajmer - 305001. 256A, Scheme No:1, Arya Nagar, Alwar - 301001. C/o Kodwani Associtates, Shop No 211-213, 2nd floor, Indra Prasth Tower, Syam Ki Sabji Mandi, Near Mukerjee Garden Bhilwara - 311001. 1/5, Nirmal Tower, 1st Chopasani Road, Jodhpur - 342003. B-33 'Kalyan Bhawan, Triangle Part, Vallabh Nagar, Kota -324007. 32, Ahinsapuri, Fatehpura circle, Udaipur- 313001. Behind Rajasthan Patrika, in front of Vijaya Bank, 1404, Amar Singh Pura, Bikaner - 334001. 3, Ashok Nagar, Near Heera Vatika,

Chittorgarh - 312001. C/O Gopal Sharma & Company, Third Floor, Sukhshine Complex, Near Geetanjali Book depot, Tapadia Bagichi, Sikar 332001. Sikkim: Hotel Haritage Sikkim, Ground Floor, Diesel Power House Road (D.P.H.Road), Near Janta Bhawan, P.O & P.S.Gangtok, Dist East -737101 Tamilnadu: Ground Floor No.178/10, Kodambakkam High Road, Opp. Hotel Palmgrove, Nungambakkam-Chennai - 600034. No 1334; Thadagam Road, Thirumoorthy Layout, R.S.Puram, Behind Venkteswara Bakery, Coimbatore – 641002. Shop No 3, 2nd Floor, Suriya Towers 272/273 - Goodshed Street, Madurai - 625001. 197, Seshaiyer Complex, Agraharam Street, Erode - 638001. No. 2, I Floor Vivekananda Street, New Fairlands, Salem -636016. 1(1), Binny Compound, II Street, Kumaran Road, Tirupur, - 641601.No. F4, Magnem Suraksaa Apartments Tiruvananthapuram Road Tirunelveli-627 002. No 8, 1st Floor, 8th Cross West Extn, Thillainagar, Trichy - 620018. DOOR NO 86, BA Complex, 1st Floor Shop No 3, Anna Salai (Officer Line) Tollgate, Vellore - 632 001. No.28/8, 1st Floor, Balakrishna Colony Pachaiappa Street, Near VPV Lodge, Kumbakonam - 612001. 126 G, V.P.Towers, Kovai Road, Basement of Axis Bank, Karur - 639002. 16A/63A, Pidamaneri Road, Near Indoor Stadium, Dharmapuri - 636701. Survey No.25/204, Attibele Road, HCF Post, Mathigiri, Above Time Kids School, Opposite to Kuttys Frozen Foods, Hosur - 635 110. 156A / 1, First Floor, Lakshmi Vilas Building, Opp. District Registrar Office, Trichy Road, Namakkal - 637001. No 59 A/1, Railway Feeder Road (Near Railway Station) Rajapalayam - 626117. 4B/A16, Mangal Mall Complex, Ground Floor, Mani Nagar, Tuticorin - 628003. No.158, Rayala Tower-1, Anna salai, Chennai -600002.III Floor, B R Complex, No.66, Door No. 11A, Ramakrishna Iyer Street, Opp. National Cinema Theatre, West Tambaram, Chennai – 600 045. Shop No 1&2 Saradaram complex door no 6-7Theradi kadai street, Chidambaram - 608001. IV Floor, Kalluveettil Shyras Center, 47, Court Road, Nagercoil - 629001. Telangana: HNo.7-1-257, Upstairs S B H Mangammathota, Karimnagar - 505001. Shop No: 11 - 2 - 31/3, 1st floor, Philips Complex, Balajinagar, Wyra Road, Near Baburao Petrol Bunk, Khammam - 507001. 208, II FloorJade Arcade Paradise Circle, Hyderabad - 500003. Hno. 2-4-641, F-7, 1st Floor, A.B.K Mall, Old Bus Depot Road, Ramnagar, Hanamkonda, Warangal - 506001. No. 15-31-2M-1/41st Floor, 14-A, MIG KPHB Colony, Kukatpally, Hyderabad - 500072. H. No.: 14-3-178/1B/A/1, Near Hanuman Temple, Balaji Nagar, Boothpur Road, Mahabubnagar - 509001. No-6-4-80, 1st Floor, Above Allahabad Bank, Opp. Police Auditorium, V T Road, Nalgonda-508001. 5-6-208, Saraswathi nagar, Opposite Dr. Bharathi Rani Nursing Home, Nizamabad - 503001. 3-407/40-4, Basement floor, Royal Enfield Show Room Building, Bellampally Road, Mancherial – 504302. Tripura: Nibedita 1st floor, JB Road Palace Compound Agartala, Near Babuana Tea and Snacks, Tripura west - 799001. Uttarakhand: 204/121 Nari Shilp Mandir Marg, Old Connaught Place, Dehradun - 248001. 22, Civil Lines, Ground Floor, Hotel Krish Residency, Roorkee - 247667. Dev Bazar, Bazpur Road, Kashipur-244713. Uttar Pradesh: 1st Floor 106 to 108, City Centre Phase II, 63/2, The Mall, Kanpur -208001. First Floor C-10 RDC Rajnagar, Opp Kacheri Gate No.2, Ghaziabad - 201002. Office no,107,1st floor, Vaishali Arcade Building, Plot no 11, 6 Park Road, Lucknow-226001. No. 8, 2nd Floor, Maruti Tower Sanjay Place, Agra - 282002. 18/18A, FF-3, Gayatri Dham Milan Tower, MG Marg, Civil Lines, Prayagraj, Allahabad - 211 001. Shop No. 5 & 6, 3rd Floor, Cross Road The Mall, A D Tiraha, Bank Road, Gorakhpur – 273001. 108 1st Floor, Shivam Plaza, Opp Eves Cinema, Hapur Road, Meerut - 250002. H 21-22, Ist Floor, Ram Ganga Vihar Shopping Complex, Opposite Sale Tax Office, Moradabad - 244001. Office no 1, Second floor, Bhawani Market, Building No. D-58/2-A1, Rathyatra Beside Kuber Complex, Varanasi - 221010. Opp SBI Credit Branch, Babu Lal Kharkana Compound, Gwalior Road, Jhansi - 284001. City Enclave, Opp. Kumar Nursing Home, Ramghat Road, Aligarh - 202001. F-62 - 63, Second Floor, Butler Plaza, Civil Lines, Bareilly- 243001 . 1st Floor, Krishna Complex, Opp. Hathi Gate, Court Road, Saharanpur - 247001.Commercial Shop No.GF 10 & GF 38, Ground Floor, Ansal Fortune Arcad Plot No. K-82, Sector -18, Noida - 201301.Near JCB Office, Noida - 201301. CAMS C/O Rajesh Mahadev & Co, Shop No 3, Jamia Comlex Station Road, Basti - 272002. 9/1/51, Rishi Tola, Fatehganj, Ayodhya, Faizabad - 224001. Durga City Centre, Nainital Road, Haldwani - 263139. Gopal katra, 1st Floor, Fort Road, Jaunpur-222001. 159/160 Vikas Bazar Mathura - 281001. 17, Anand Nagar Complex, Opposite Moti Lal Nehru Stadium, SAI Hostel, Jail Road, Rae Bareilly -229001. Bijlipura, Near Old Distt Hospital, Jail Road, Shahjahanpur - 242001. Arya Nagar, Near Arya Kanya School, Sitapur - 261001. 967, Civil Lines, Near Pant Stadium, Sultanpur - 228001. 53, 1st Floor, Shastri Market, Sadar Bazar, Firozabad, Uttarpradesh-283203. F-3, Hotel Shaurya, New Model Colotpny, Haridwar-249 408. Ground Floor, Canara Bank Building, Dhundhi Katra, Mirzapur - 231001. F26/27-Kamadhenu Market, Opp. LIC Building, Ansari Road, Muzaffarnagar – 251001. Opp Dutta Traders Near Durga Mandir Balipur Pratapgarh – 230001. West Bengal: Plot No. 3601, Nazrul Sarani, City Centre, Durgapur - 713216. Kankaria Centre, 2/1, Russell Street, (2nd Floor), Kolkata - 700071. Block - G 1st Floor, P C Chatterjee Market Complex, Rambandhu Talab PO, Ushagram, Asansol - 713303. 399 G T Road, Basement, Building Name :- Talk of the Town., Burdwan-713101. 78, Haren Mukherjee Road, 1st floor, Beside SBI Hakimpara, Siliguri 734001. A - 1/50, Block A, Kalyani - 741235. "Silver Palace", OT Road, Inda- Kharagpur, G.P-Barakola, P.S - Kharagpur Local - 721305, Dist-West Midnapore. 3/1, R.N. Mukherjee Road, 3rd Floor, Office space -3C, "Shreeram Chambers" Kolkata -700 001. Mouza-Basudevpur, J. L. NO.126, Haldia Municipality, Ward No 10, Durgachak, Haldia -721602. Daxhinapan Abasan, Opp Lane of Hotel, Kalinga, SM Pally, Malda - 732101. 1st Floor, Central Bank Building Machantala, PO Bankura, Dist Bankura, West Bengal - 722101, 47/5/1, Raja Rammohan Roy Sarani PO. Mallickpara, Dist. Hoogly Seerampore -712203. Mukherjee Building, First Floor, Beside MP Jewellers, Next to Mannapuram, Ward No. 5, Link Road, Arambagh, Hooghly – 712601. RBC Road, Ground Floor, Near Barasat Kalikrishna girls High School, Barasat-700124. No.107/1, A C Road, Ground Floor, Bohorompur, Murshidabad, -742103. Bhubandanga, Opposite Shiv, Shambhu Rice Mill, 1st Floor, Bolpur 731204. Nipendra Narayan Road (N.N Road) Opposite Udichi Market Near - Banik Decorators PO & Dist, Cooch Behar - 736101. Babu Para, Beside Meenaar Apartment ,Ward No VIII, Kotwali Police Station -735101.KH. No. 183/2G, opposite Hotel Blue Diamond, T.P. Nagar, Korba, - 495677 . R.N Tagore Road, In front of Kotawali P.S.Krishnanagar Nadia-741101. Rabindra Pally Beside of Gitanjali Cenema Hall P O & P S Raiganj, Dist North Dijajpur Raiganj – 733134. Police Line, Ramakrishnapally, Near Suri Bus Stand, Suri - 731101. Apurba Market, Ground Floor, Vill Mirjapur, Opp: Basirhat College, PO: Basirhat College, Dist: 24PGS (north), Basirhat, Pin- 743412. Anand Plaza, Shop No. 06 2nd Floor, Sarbananda Sarkar Street, Munsifdanga, Purulia 723101. Holding No-58, 1st Floor, Padumbasan Ward No 10, Tamluk Maniktala More, Beside HDFC Bank, Tamluk, Purba Medinipur, Tamluk- 721636. Santinagar Ward No-14, Near Upal Mukhar Puja Ground, P.O. Alipurduar, District - Alipurduar, Pin -736121.

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