

## STATEMENT OF ADDITIONAL INFORMATION (SAI)

### ABAKKUS MUTUAL FUND

This Statement of Additional Information (SAI) contains details of Abakkus Mutual Fund, its constitution, and certain tax, legal and general information. It is incorporated by reference (is legally a part of the Scheme Information Document).

**This SAI is dated November 27, 2025.**

<b>Name of the Sponsor</b>	Abakkus Asset Manager Private Limited (formerly known as Abakkus Asset Manager LLP) CIN: U70200MH2024PTC432609
<b>Name of Mutual Fund</b>	Abakkus Mutual Fund Registration Code: MF/088/25/14
<b>Name of Asset Management Company</b>	Abakkus Investment Managers Private Limited CIN: U66301MH2025PTC446708
<b>Name of Trustee Company</b>	Abakkus Trustee Private Limited CIN: U66190MH2025PTC446966
<b>Registered Office Address</b>	Abakkus Corporate Centre, 6 <sup>th</sup> Floor, Param House, Shanti Nagar, Near Grand Hyatt, Santacruz (East), Mumbai – 400055, Maharashtra, India
<b>Website</b>	<a href="https://www.abakkusmf.com/">https://www.abakkusmf.com/</a>
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## **I. INFORMATION ABOUT SPONSOR, AMC AND TRUSTEE COMPANIES**

### **A. Constitution of the Mutual Fund**

Abakkus Mutual Fund (the “Mutual Fund”) has been constituted as a trust in accordance with the provisions of the Indian Trusts Act, 1882 (2 of 1882) as per the terms of the deed of trust dated May 28, 2025, with Abakkus Asset Manager Private Limited as the Sponsor and Abakkus Trustee Private Limited as the Trustee.

The Trust Deed has been registered under the Indian Registration Act, 1908. Abakkus Mutual Fund is registered with SEBI under Registration Code. MF/088/25/14 dated August 29, 2025.

No amendments to the Trust Deed shall be carried out without the prior approval of SEBI and Unit holders’ approval/ consent will be obtained where it affects the interests of Unit holders as per the procedure/provisions laid down in the Regulations.

#### **The Registered Office:**

Abakkus Corporate Centre, 6<sup>th</sup> Floor, Param House, Shanti Nagar, Near Grand Hyatt, Santacruz (East), Mumbai - 400055, Maharashtra, India.

### **B. Sponsor**

Abakkus Mutual Fund is sponsored by Abakkus Asset Manager Private Limited (formerly known as Abakkus Asset Manager LLP). The Sponsor is the Settlor of the Mutual Fund Trust. The Sponsor has entrusted a sum of Rs. 10,000/- to the Trustee as the initial contribution towards the corpus of the Mutual Fund.

#### **Financial Performance of the Sponsor (past three years):**

**(Rs. in Crores)**

<b>Particulars</b>	<b>2024-2025</b>	<b>2023-2024</b>	<b>2022-2023</b>
Net Worth	Rs. 330.22	Rs. 213.14	Rs. 102.89
Total Income	Rs. 699.04	Rs. 424.65	Rs. 230.27
Profit after tax	Rs. 251.60	Rs. 155.33	Rs. 72.29
Assets Under Management	Rs. 32,542.90	Rs. 27,619.17	Rs. 13,419.06

### **C. The Trustee**

Abakkus Trustee Private Limited (the “Trustee”), through its Board of Directors, shall discharge its obligations as trustee of the Abakkus Mutual Fund. The Trustee ensures that the transactions entered into by the AMC are in accordance with the SEBI Regulations and will also review the activities carried on by the AMC.

#### **i. Details of Trustee Directors:**

<b>Name</b>	<b>Age</b>	<b>Educational Qualifications</b>	<b>Brief Experience</b>
<b>Mr. Mohan Tanksale (Independent Director)</b>	72 Years	Bachelors in Science, Masters in English Literature, a Fellow Member of the Institute of Cost Accountants of India, Certified Associate of the Indian Institute of Banking and Finance	Mr. Mohan Tanksale has a career as a banker having spent over four decades in the Indian banking industry. He is one of the most senior and respected bankers in India, having served as the Chairman & Managing Director of Central Bank of India and the CEO of Indian Banks’ Association (IBA) and held senior positions with Union Bank of India and Punjab National Bank. He was a Banking & Fintech Advisor to Federation of Indian Chambers of Commerce and Industry (FICCI) and advisor and mentor to Experian Credit Information Company of India Private Limited.

			Besides serving on various Company Boards, he is also Strategic Consultant of SWIFT India Domestic Messaging Services Limited and a Council member to MelJol (NGO). Conferred with several awards, distinctions and accolades during his rich career, he has won the GOLDEN PEACOCK HR EXCELLENCE AWARD 2012, PERSON OF THE YEAR for his contribution to Financial Inclusion by SKOCH Foundation.
<b>Mr. Chandru Badrinarayanan (Independent Director)</b>	58 Years	Senior Executive Leadership Program, INSEAD Business School, Certified Associate, Indian Institute of Bankers, Chartered Financial Analyst, ICFAI (India), Bachelor of Science, Osmania University	Mr. Chandru Badrinarayanan has 4 decades of experience across Banking, Global Equities, Fixed Income markets, Risk Management, ESG and Climate Analytics. He was Executive Director & Head of MSCI's India business and played a key role in catalyzing ESG Investments and Passive investing in India. At Crisil Ltd (a S&P company) he was a founding member of the Risk Solutions business and headed various other businesses as a Senior Director. He has also contributed to national policy on sustainable finance regulations. Mr. Badrinarayanan is also an Independent Director on the Board of Brickworks Ratings India Private Limited, a full service credit rating firm.
<b>Dr. Brinda Jagirdar (Independent Director)</b>	72 Years	Bachelors in Arts, Ferguson College, Pune, Masters in Arts, Gokhale College, Pune, MS, University of California, Davis, USA Ph.D. in Economics, University of Mumbai	Dr. Brinda Jagirdar is a senior economist specialising in areas relating to the Indian economy and banking. She is an Independent Director on several corporate boards. She is a member of RBI's Depositor Education and Awareness Fund Committee and is on the Governing Council of Treasury Elite, a knowledge-sharing platform for finance professionals. She is on the Banking and Finance Committee of the Indian Merchants Chamber. She was a member of the Research Advisory Committee of the Indian Institute of Banking and Finance. She retired as Chief Economist, at State Bank of India. As part of the Bank's Top Management team, her work at SBI involved tracking developments in the Indian and global economy and analysing implications for policy, participating in the Bank's Asset Liability Committee and Central Management Committee meetings as an invitee and conducting research studies on relevant issues. She was a member of Banking, Finance & Economics Committee of the Bombay Chamber of Commerce, member of the Monetary Policy Group of Indian Banks' Association and editorial committee member of the journal of the Indian Banks' Association.
<b>Mr. Biharilal Deora (Associate Director)</b>	43 Years	Chartered Financial Analyst (CFA)	Mr. Biharilal Deora is an investment professional with over 20 years of experience

		Certified Financial Planner (CFPCM) Chartered Accountant (FCA), Masters in Commerce (M Com)	<p>in credit research, strategy, and business analysis. He is a certified International Wealth Manager (CIWM), AIWM and Credit Research Analyst (CCRA), NISM.</p> <p>Prior to joining the founding team of Abakkus, Mr. Deora served as advisor to various single-family offices on credit investments. He also serves as an advisor to various education and industry associations and provides perspectives on policy, governance and market issues related to banking, capital markets, insurance, pensions to regulators across the globe.</p> <p>Mr. Deora has worked at global firms such as Sutherland, Fidelity, Credit Suisse and Reliance Industries. Mr. Deora also serves as visiting faculty to various higher education institutes. Besides on the Board of Abakkus Group Companies, he is a Director of Association of Portfolio Managers in India and Association of Registered Investment Advisers.</p>
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**ii. Rights, obligations, responsibilities and duties of the Trustee under the deed of Trust and the SEBI (Mutual Funds) Regulations, 1996:**

1. The trustees and the asset management company shall with the prior approval of the Board enter into an Investment Management Agreement.
2. The Investment Management Agreement shall contain such clauses as are mentioned in the Fourth Schedule and such other clauses as are necessary for the purpose of making investments.
3. The trustees shall have a right to obtain from the asset management company such information as is considered necessary by the trustees.
4. The trustees shall ensure that an asset management company has been diligent in empaneling the brokers, in monitoring securities transactions with brokers and avoiding undue concentration of business with any broker. The Trustees shall approve the policy for empanelment of brokers by the AMC.
5. The trustees shall ensure that the asset management company has not given any undue or unfair advantage to any associates or dealt with any of the associates of the asset management company in any manner detrimental to interest of the unitholders.
6. The trustees shall ensure that the transactions entered into by the asset management company are in accordance with SEBI Mutual Fund regulations and the scheme.
7. The trustees shall ensure that the asset management company has been managing the mutual fund schemes independently of other activities and have taken adequate steps to ensure that the interest of investors of one scheme are not being compromised with those of any other scheme or of other activities of the asset management company.
8. The trustees shall ensure that all the activities of the asset management company are in accordance with the provisions of these regulations.
9. Where the trustees have reason to believe that the conduct of business of the mutual fund is not in accordance with SEBI Mutual Fund regulations and the scheme they shall forthwith take such remedial steps as are necessary by them and shall immediately inform the Board of the violation and the action taken by them.
10. Each trustee shall file the details of his transactions of dealing in securities with the Mutual Fund, within the time and manner as may be specified by the Board from time to time.
11. The trustees shall be accountable for, and be the custodian of, the funds and property of the respective schemes and shall hold the same in trust for the benefit of the unitholders in accordance with these regulations and the provisions of trust deed.
12. The trustees shall take steps to ensure that the transactions of the mutual fund are in accordance with the provisions of the trust deed.

13. The trustees shall ensure that the income calculated by the asset management company under sub-regulation (25) of regulation 25 of these regulations is in accordance with these regulations and the trust deed.
14. The trustees shall obtain the consent of the unitholders—
  - a) whenever required to do so by the Board in the interest of the unitholders; or
  - b) whenever required to do so on the requisition made by three-fourths of the unit- holders of any scheme; or
  - c) when the majority of the trustees decide to wind up a scheme in terms of clause (a) of sub regulation (2) of regulation 39 or prematurely redeem the units of a close ended scheme.
- (14A) The trustees shall ensure that no change in the fundamental attributes of any scheme or the trust or fees and expenses payable or any other change which would modify the scheme and affects the interest of unitholders, shall be carried out by the asset management company, unless it complies with sub-regulation (26) of regulation 25 of these regulations.
15. The trustees shall call for the details of transactions in securities by the key personnel of the asset management company in his own name or on behalf of the asset management company and shall report to the Board, as and when required.
16. The trustees shall quarterly review all transactions carried out between the mutual funds, asset management company and its associates.
17. The trustees shall on a quarterly basis review the net worth of the asset management company to ensure compliance with the threshold provided in clause (f) of sub-regulation (1) of regulation 21 on a continuous basis.
18. The trustees shall periodically review all service contracts such as custody arrangements, transfer agency of the securities and satisfy itself that such contracts are executed in the interest of the unitholders.
19. The trustees shall ensure that there is no conflict of interest between the manner of deployment of its network by the asset management company and the interest of the unit- holders.
20. The trustees shall periodically review the investor complaints received and the redressal of the same by the asset management company.
21. The trustees shall abide by the Code of Conduct as specified in Part - A of the Fifth Schedule.
22. The trustees shall furnish to the Board on a half-yearly basis,—
  - a) a report on the activities of the mutual fund;
  - b) a certificate stating that the trustees have satisfied themselves that there have been no instances of self-dealing or front running by any of the trustees, directors and key personnel of the asset management company;
  - c) a certificate to the effect that the asset management company has been managing the schemes independently of any other activities and in case any activities of the nature referred to in clause (b) of regulation 24 have been undertaken by the asset management company and has taken adequate steps to ensure that the interests of the unitholders are protected.
23. The independent trustees referred to in sub-regulation (5) of regulation 16 shall give their comments on the report received from the asset management company regarding the investments by the mutual fund in the securities of group companies of the sponsor.
24. Trustees shall exercise due diligence as under :
  - A. General Due Diligence:**
    - i. The Trustees shall be discerning in the appointment of the directors on the Board of the asset management company.
    - ii. Trustees shall review the desirability or continuance of the asset management company if substantial irregularities are observed in any of the schemes and shall not allow the asset management company to float new schemes.
    - iii. The Trustee shall ensure that the trust property is properly protected, held and administered by proper persons and by a proper number of such persons.
    - iv. The Trustee shall ensure that all service providers are holding appropriate registrations from the Board or concerned regulatory authority.
    - v. The Trustees shall arrange for test checks of service contracts.
    - vi. Trustees shall immediately report to the Board of any special developments in the mutual fund.

**B. Specific due diligence:**

The Trustees shall:

- i. obtain internal audit reports at regular intervals from independent auditors appointed by the Trustees,
- ii. obtain compliance certificates at regular intervals from the asset management company,
- iii. hold meeting of trustees more frequently,

- iv. consider the reports of the independent auditor and compliance reports of asset management company at the meetings of trustees for appropriate action,
  - v. maintain records of the decisions of the Trustees at their meetings and of the minutes of the meetings,
  - vi. prescribe and adhere to a code of ethics by the Trustees, asset management company and its personnel,
  - vii. communicate in writing to the asset management company of the deficiencies and checking on the rectification of deficiencies.
25. Notwithstanding anything contained in sub-regulations (1) to (24), the trustees shall not be held liable for acts done in good faith if they have exercised adequate due diligence honestly.
- The independent directors of the trustees or asset management company shall pay specific attention to the following, as may be applicable, namely:—
- i. the Investment Management Agreement and the compensation paid under the agreement,
  - ii. service contracts with associates—whether the asset management company has charged higher fees than outside contractors for the same services,
  - iii. selections of the asset management company’s independent directors,
  - iv. securities transactions involving associates to the extent such transactions are permitted,
  - v. selecting and nominating individuals to fill independent directors vacancies,
  - vi. code of ethics must be designed to prevent fraudulent, deceptive or manipulative practices by insiders in connection with personal securities transactions,
  - vii. the reasonableness of fees paid to sponsors, asset management company and any others for services provided,
  - viii. principal underwriting contracts and their renewals,
  - ix. any service contract with the associates of the asset management company.

### **C. Core Responsibilities of the Trustees:**

As per Regulation 18(25)(C) of MF Regulations, the Trustees shall exercise due diligence on such matters as may be specified by the SEBI from time to time. In terms of the said Regulation 18 (25)(C), the Trustees shall exercise independent due diligence on certain “core responsibilities”, which are specified as under:

- a) The Trustees shall ensure the fairness of the fees and expenses charged by the AMCs.
- b) The Trustees shall review the performance of AMC in its schemes vis-à-vis performance of peers or the appropriate benchmarks.
- c) The Trustees shall ensure that the AMCs have put in place adequate systems to prevent mis-selling to increase assets under their management and valuation of the AMCs.
- d) The Trustees shall ensure that operations of AMCs are not unduly influenced by the AMCs Sponsor, its associates and other stakeholders of AMCs.
- e) The Trustees shall ensure that undue or unfair advantage is not given by AMCs to any of their associates/group entities.
- f) The Trustees shall be responsible to address conflicts of interest, if any, between the shareholders /stakeholders /associates of the AMCs and unitholders.
- g) The Trustees shall ensure that the AMC has put in place adequate systems to prevent misconduct including market abuse/ misuse of information by the employees, AMC and connected entities of the AMCs.
  - The Trustees shall take steps to ensure that there are system level checks in place at AMCs’ end to prevent fraudulent transactions including front running by employees, form splitting/ mis-selling by distributors etc. The Trustees shall review such checks periodically.
  - The Trustees and their resource persons shall independently evaluate the extent of compliance by AMCs vis-à-vis the identified key areas and not merely rely on AMCs’ submissions/external assurances.
  - AMCs shall put in place suitable mechanisms/systems to generate system based information/data/reports for evaluation and effective due diligence by the Trustees. AMCs shall provide alerts based automated reports to the Trustees as may be required by the Trustees.
  - The Trustees shall ensure that suitable mechanisms/systems are put in place by the AMCs to generate system-based information/data/reports for evaluation and effective due diligence by the Trustees. The Trustees shall also ensure that the AMCs periodically review such systems.

- AMCs shall submit exception reports/analytical information to the Trustees, that add value to the process of exercising their oversight role. The Trustees shall evaluate the nature and adequacy of the alerts and the manner of dealing with such alerts by AMCs.

The trustees shall also exercise due diligence on such matters as may be specified by the Board from time to time.

#### **E. Supervisory Role of the Trustee**

The supervisory role of Trustee will be discharged inter alia by reviewing the information and operations of the Mutual Fund based on the internal audit reports/compliance reports received on a periodical basis. The Compliance Officer has direct reporting line to the Board of Directors of the Trustee. The Board meeting of the Trustee shall be held at least once in every two calendar months and at least six such meetings shall be held in every year or at such frequency as may be prescribed under the Regulations. Further, the quorum for a Board meeting of the Trustee shall not be constituted unless such number of independent directors as may be prescribed by SEBI from time to time, are present at the meeting.

Further the Audit Committee chaired by an independent director of the Trustee is responsible for:

- Review of the periodic financial statements of the Trustee and Mutual Fund including audit observations;
- Review of internal audit systems and internal and statutory audit reports and
- Recommending appointment of auditors.

#### **iii. Trustee – Fees and Expenses**

In accordance with the Deed of Trust constituting the Mutual Fund, The Trustee Company shall be entitled to charge fees upto 10 bps per annum on the daily net assets of the funds subject to a maximum of Rs. 5,00,00,000 per annum at Mutual Fund Scheme level; plus taxes.

The Trustee fees shall be as ascertained and payable in the manner set out in the Scheme's Offer Document/s. Further, the actual fees shall be decided by the Board of Directors of the Trustee Company from time to time. The aforesaid remuneration is in addition to all costs, charges and expenses incurred in or in connection with the administration and execution of the Mutual Fund.

Trusteeship fees will be paid at such intervals as may be determined from time to time by the board of directors of the Trustee Company. The trusteeship fee shall be subject to the limits if any prescribed under the Regulations.

## **II. Asset Management Company**

Abakkus Investment Managers Private Limited is a private limited company incorporated under the Companies Act, 2013 on April 24, 2025, having its Registered Office at Abakkus Corporate Center, 6<sup>th</sup> Floor, Param House, Shanti Nagar, Near Grand Hyatt, Santacruz (East), Mumbai – 400055. Abakkus Investment Managers Private Limited has been appointed as the Asset Management Company of Abakkus Mutual Fund by the Trustee vide Investment Management Agreement (IMA) dated June 04, 2025, entered between Abakkus Trustee Private Limited and Abakkus Investment Managers Private Limited.

Abakkus Asset Manager Private Limited along with its nominees holds 100% of the share capital of the AMC.

The appointment of the AMC for the Mutual Fund can be terminated by majority of the directors of the Trustee or by 75% of the Unit holders of the Scheme.

#### **A. Details of AMC Directors:**

Name	Age	Educational Qualifications	Brief Experience
<b>Mr. Mrugank Paranjape</b>	59 Years	PGD-Management (Information Systems)	Mrugank Paranjape has over 34 years of experience at CXO levels in the financial services industry in India and overseas, specialising in banking, asset management, commodities exchange and technology.



<b>(Independent Director)</b>		Bachelor of Electrical Engineering (Telecommunications)	Paranjape was the MD & CEO of NCDEX e Markets Ltd. and, prior to that, the MD & CEO of Multi Commodity Exchange of India (MCX), India's first listed and leading commodity exchange. Earlier, he had successful stints in India and abroad with global financial institutions, including Deutsche Bank, ICICI Prudential, W.I. Carr Securities, ING Barings, and Citibank. He is an expert and consultant in the field of capital and commodity markets. He also serves on several boards. He is a Non-Executive Independent Director on the Central Board of the State Bank of India, Chairman of the Board of Trustees of Sewa International, and Chair of the Board of the Mumbai School of Economics and Public Policy. He is an alumnus of the Indian Institute of Technology, Bombay, and the Indian Institute of Management, Ahmedabad.
<b>Dr. Nirakar Pradhan (Independent Director)</b>	64 Years	CCRA, CFP, CFA, PHD (Business Administration), FRM, CAIIB, MA	<p>Dr. Nirakar Pradhan is a distinguished finance professional holding notable certifications including CFA, FRM, PRM and CAIIB, brings over three decades of experience in the financial industry across diverse cultural landscapes in India and Europe. Adept leadership and strategic acumen, with consistency in delivering pioneering solutions in Treasury, Investment, and Risk Management domains. Proficient in spearheading strategic endeavours that optimize financial processes, mitigate risks, and drive sustainable growth while promoting innovation and excellence in the financial sector. Driven by a relentless passion for advancing financial education and fostering best market practices, exploring challenging leadership role, to leverage extensive expertise in Treasury, Investment, and Enterprise Risk Management to lead transformative initiatives within global financial institutions or industry associations.</p> <p>He has held key leadership roles in prestigious organizations such as State Bank of India (SBI), Generali Group, and as the first CEO of PRMIA India, showcasing adaptability and expertise in multi-cultural environments and recognized for strategic acumen and vision, notably as the first Chief Investment Officer at Future Generali India Life Insurance, where successfully devised and executed ambitious plans, achieving top quartile investment returns. He is known for fostering dynamic and adaptable cultures within teams. Successfully transformed operational losses into significant profits, achieving multi-million-dollar turnarounds through strategic investments.</p> <p>Further, he is the Founding Director of Finkasturi Nivesh Pvt Ltd, a SEBI registered Investment Advisor, showcasing entrepreneurial spirit and commitment to delivering tailored investment advisory solutions. He is also an author, multi-lingual speaker, actively involved in advocating financial education, innovation, and best market practices.</p>
<b>Mr. Sunil Singhania (Associate Director)</b>	58 Years	Chartered Accountant, Chartered Financial Analyst, B. Com	<p>Mr. Singhania has more than 25 years of experience in garnering and managing business across asset management vertical including Alternative Investment Fund and Portfolio Management Services.</p> <p>In 2018, he founded Abakkus Asset Manager LLP (now Abakkus Asset Manager Private Limited), reflecting his investment principles. He was rated among the Best fund managers by Outlook Business in 2016 and 2017 over a 10 year time frame. He was the first Indian to be appointed on the Global Board of CFA institute, USA (2013-2019). Currently he is the only Indian to be appointed on the IFRS Capital Market Advisory Committee (CMAC) (2020-2023). He was the Chief Investment Officer (CIO), Equities of Reliance Nippon Asset Management (now Nippon India Mutual Fund) overseeing – USD 11 billion of equity asset. He was also an Honorary Chairman of</p>

			Investment committee of CFA Institute (2018-2019) managing – USD 450 million.
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**Asset Management Company and its obligations as specified in the SEBI (Mutual Funds) Regulations 1996 are as under:**

1. The asset management company shall take all reasonable steps and exercise due diligence to ensure that the investment of funds pertaining to any scheme is not contrary to the provisions of the SEBI (Mutual Funds) Regulations and the Trust Deed.
2. The asset management company shall exercise due diligence and care in all its investment decisions as would be exercised by other persons engaged in the same business.
- 2A. The asset management company shall obtain, wherever required under these regulations, prior in-principle approval from the recognized stock exchange(s) where units are proposed to be listed.
3. The asset management company shall be responsible for the acts of commission or omission by its employees or the persons whose services have been procured by the Asset Management Company.
4. The asset management company shall submit to the trustees quarterly reports of each year on its activities and the compliance with these regulations.
5. The trustees at the request of the Asset Management Company may terminate the assignment of the Asset Management Company at any time:

Provided that such termination shall become effective only after the trustees have accepted the termination of assignment and communicated their decision in writing to the Asset Management Company.

6. Notwithstanding anything contained in any contract or agreement or termination, the Asset Management Company or its directors or other officers shall not be absolved of liability to the mutual fund for their acts of commission or omission, while holding such position or office.
- (6A) (a) The Chief Executive Officer of the AMC shall ensure that the Mutual Fund complies with all the provisions of the SEBI (Mutual Funds) Regulations and the guidelines or circulars issued in relation thereto from time to time and that the investments made by the fund managers are in the interest of the unit holders and shall also be responsible for the overall risk management function of the mutual fund.
- (b) Chief Executive Officer whatever be the designation shall also ensure that the Asset Management Company has adequate systems in place to ensure that the Code of Conduct for Fund Managers and Dealers specified in PART - B of the Fifth Schedule of these regulations are adhered to in letter and spirit. Any breach of the said Code of Conduct shall be brought to the attention of the Board of Directors of the Asset Management Company and Trustees.
- (6B) (a) The Fund Managers shall ensure that the funds of the schemes are invested to achieve the objectives of the scheme and in the interest of the unit holders.
- (b) The Fund Managers shall abide by the Code of Conduct for Fund Managers and Dealers specified in PART - B of the Fifth Schedule of Securities and Exchange Board of India (Mutual Funds) Regulations, 1996 and submit a quarterly self-certification to the Trustees that they have complied with the said code of conduct or list exceptions, if any.
- Explanation:** - For the purposes of this sub-regulation, the phrase —Fund Managers shall include Chief Investment Officer (whatever be the designation).
- (6C) (a) The Dealers whatever be the designation shall ensure that orders are executed on the best available terms, taking into account the relevant market at the time for transactions of the kind and size concerned to achieve the objectives of the scheme and in the best interest of all the unit holders.
- (b) The Dealers whatever be the designation shall abide by the Code of Conduct for Fund Managers and Dealers specified in PART - B of the Fifth Schedule of the Securities and Exchange Board of India (Mutual Funds) Regulations, 1996 and submit a quarterly self-certification to the Trustees that they have complied with the said code of conduct or list exceptions, if any.
- (6D) The board of directors of the Asset Management Company shall ensure that all the activities of the Asset Management Company are in accordance with the provisions of Mutual Fund regulations.
7. (a) An Asset Management Company shall not through any broker associated with the sponsor, purchase or sell securities, which is average of 5 per cent or more of the aggregate purchases and sale of securities made by the mutual fund in all its schemes.

Provided that for the purpose of this sub-regulation, the aggregate purchase and sale of securities shall exclude sale and distribution of units issued by the mutual fund:

Provided further that the aforesaid limit of 5 per cent shall apply for a block of any three months.

(b) An Asset Management Company shall not purchase or sell securities through any broker [other than a broker referred to in clause (a) of sub-regulation (7) which is average of 5 per cent or more of the aggregate purchases and sale of securities made by the mutual fund in all its schemes, unless the Asset Management Company has recorded in writing the justification for exceeding the limit of 5 per cent and reports of all such investments are sent to the trustees on a quarterly basis:

Provided that the aforesaid limit shall apply for a block of three months.

8. An Asset Management Company shall not utilise the services of the sponsor or any of its associates, employees or their relatives, for the purpose of any securities transaction and distribution and sale of securities:

Provided that an Asset Management Company may utilise such services if disclosure to that effect is made to the unitholders and the brokerage or commission paid is also disclosed in the half-yearly annual accounts of the mutual fund.

Provided further that the mutual funds shall disclose at the time of declaring half-yearly and yearly results:

- i. any underwriting obligations undertaken by the schemes of the mutual funds with respect to issue of securities associate companies,
  - ii. devolvement, if any,
  - iii. subscription by the schemes in the issues lead managed by associate companies,
  - iv. subscription to any issue of equity or debt on private placement basis where the sponsor or its associate companies have acted as arranger or manager.
9. The Asset Management Company shall file with the trustees the details of transactions in securities by the key personnel of the asset management company in their own name or on behalf of the asset management company and shall also report to the Board, as and when required by the Board.
  10. In case the Asset Management Company enters into any securities transactions with any of its associates a report to that effect shall be sent to the trustees at its next meeting.
  11. In case any company has invested more than 5 per cent of the net asset value of a scheme, the investment made by that scheme or by any other scheme of the same mutual fund in that company or its subsidiaries shall be brought to the notice of the trustees by the asset management company and be disclosed in the half-yearly and annual accounts of the respective schemes with justification for such investment provided the latter investment has been made within one year of the date of the former investment calculated on either side.
  12. The asset management company shall file with the trustees and the Board—
    - a) detailed bio-data of all its directors along with their interest in other companies within fifteen days of their appointment;
    - b) any change in the interests of directors every six months; and
    - c) a quarterly report to the trustees giving details and adequate justification about the purchase and sale of the securities of the group companies of the sponsor or the asset management company, as the case may be, by the mutual fund during the said quarter.
  13. Each director of the asset management company shall file the details of his transactions of dealing in securities with the trustees on a quarterly basis in accordance with guidelines issued by the Board.
  14. The asset management company shall not appoint any person as key personnel who has been found guilty of any economic offence or involved in violation of securities laws.
  15. The asset management company shall appoint registrars and share transfer agents who are registered with the Board:
 

Provided if the work relating to the transfer of units is processed in-house, the charges at competitive market rates may be debited to the scheme and for rates higher than the competitive market rates, prior approval of the trustees shall be obtained and reasons for charging higher rates shall be disclosed in the annual accounts.
  16. The asset management company shall abide by the Code of Conduct as specified in PART-A of the Fifth Schedule of the SEBI (Mutual Funds) Regulations, 1996.
 

(16A.) The asset management company shall invest such amounts in such schemes of the mutual fund, based on the risks associated with the schemes, as may be specified by the Board from time to time.

(16B.) The asset management company shall invest a percentage of the remuneration of such employees as specified by the Board in units of mutual fund schemes based on the designation or roles of the designated employees in the manner as may be specified by the Board.
  17. The asset management company shall not invest in any of its scheme, unless full disclosure of its intention to invest has been made in the offer documents, in case of schemes launched after the notification of Securities and Exchange Board of India (Mutual Funds) (Amendment) Regulations, 2011:

Provided that an asset management company shall not be entitled to charge any fee on its investment in that scheme.

18. The asset management company shall not carry out its operations including trading desk, unit holder servicing and investment operations outside the territory of India.
19. The asset management company shall compute and carry out valuation of investments made by its scheme(s) in accordance with the investment valuation norms specified in Eighth Schedule, and shall publish the same.
20. The asset management company and the sponsor of the mutual fund shall be liable to compensate the affected investors and/or the scheme for any unfair treatment to any investor as a result of inappropriate valuation.
21. The asset management company shall report and disclose all the transactions in debt and money market securities, including inter scheme transfers, as may be specified by the Board.
22. The board of directors of the asset management company shall exercise due diligence as follows:
  - a) The board of directors of the asset management company shall ensure before the launch of any scheme that the asset management company has-
    - i. systems in place for its back office, dealing room and accounting;
    - ii. appointed all key personnel including fund manager(s) for the scheme(s) and submitted their bio-data which shall contain the educational qualifications and past experience in the securities market with the Trustees, within fifteen days of their appointment;
    - iii. appointed auditors to audit its accounts;
    - iv. appointed a compliance officer who shall be responsible for monitoring the compliance of the Act, rules and regulations, notifications, guidelines, instructions, etc., issued by the Board or the Central Government and for redressal of investors grievances;
    - v. appointed a registrar to an issue and share transfer agent registered under the Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 and laid down parameters for their supervision;
    - vi. prepared a compliance manual and designed internal control mechanisms including internal audit systems;
    - vii. specified norms for empanelment of brokers and marketing agents;
    - viii. obtained, wherever required under these regulations, prior in principle approval from the recognized stock exchange(s) where units are proposed to be listed.
  - b) The board of directors of the asset management company shall ensure that –
    - i. the asset management company has been diligent in empanelling the brokers, in monitoring securities transactions with brokers and avoiding undue concentration of business with specific brokers;
    - ii. the asset management company has not given any undue or unfair advantage to any associate or dealt with any of the associate of the asset management company in any manner detrimental to interest of the unit holders;
    - iii. the transactions entered into by the asset management company are in accordance with these regulations and the respective schemes;
    - iv. the transactions of the mutual fund are in accordance with the provisions of the trust deed;
    - v. the networth of the asset management company are reviewed on a quarterly basis to ensure compliance with the threshold provided in clause (f) of sub regulation (1) of regulation 21 on a continuous basis;
    - vi. all service contracts including custody arrangements of the assets and transfer agency of the securities are executed in the interest of the unit holders;
    - vii. there is no conflict of interest between the manner of deployment of the networth of the asset management company and the interest of the unit holders;
    - viii. the investor complaints received are periodically reviewed and redressed;
    - ix. all service providers are holding appropriate registrations with the Board or with the concerned regulatory authority;
    - x. any special developments in the mutual fund are immediately reported to the trustees;
    - xi. there has been exercise of due diligence on the reports submitted by the asset management company to the trustees;
    - xii. there has been exercise of due diligence on such matters as may be specified by the Board from time to time.
23. The compliance officer appointed under sub-clause (iv) of clause (a) of sub regulation (22) shall independently and immediately report to the Board any noncompliance observed by him
24. The asset management company shall constitute a Unit Holder Protection Committee in the form and manner and with a mandate as may be specified by the Board.

25. The asset management company shall be responsible for calculation of any income due to be paid to the mutual fund and also any income received in the mutual fund, for the unit holders of any scheme of the mutual fund, in accordance with these regulations and the trust deed.
26. The asset management company shall ensure that no change in the fundamental attributes of any scheme or the trust, fees and expenses payable or any other change which would modify the scheme and affect the interest of unit holders, shall be carried out unless—
  - i. a written communication about the proposed change is sent to each unit holder and an advertisement is issued 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; and
  - ii. the unit holders are given an option to exit at the prevailing Net Asset Value without any exit load.
27. The asset management company shall put in place an institutional mechanism, as may be specified by the Board, for the identification and deterrence of potential market abuse including front-running and fraudulent transactions in securities.
28. The Chief Executive Officer or Managing Director or such other person of equivalent or analogous rank and Chief Compliance Officer of the asset management company shall be responsible and accountable for implementation of such an institutional mechanism for deterrence of potential market abuse, including front-running and fraudulent transactions in securities.
29. The asset management company shall establish, implement and maintain a documented whistle blower policy that shall —
  - a) provide for a confidential channel for employees, directors, trustees, and other stakeholders to raise concerns about suspected fraudulent, unfair or unethical practices, violations of regulatory or legal requirements or governance vulnerability, and
  - b) establish procedures to ensure adequate protection of the whistle blowers.
30. An asset management company shall ensure compliance with the Investor Charter specified by the Board from time to time
31. The asset management company shall conduct stress testing for such schemes as specified by the Board and disclose the results of the stress testing in the form and manner, as may be specified by SEBI.

**B. Information on Key Personnel:**

Name	Designation	Age	Educational Qualification	Nature of past experience including assignments held during the last 10 years
<b>Mr. Vaibhav Chugh</b>	Chief Executive Officer	46 Years	Bachelor in Arts - Economics, Public Ad – Punjab University, Chandigarh, Punjab, India PGDM - Finance and Marketing - Institute of Management & Technology (IMT), Ghaziabad, India	Vaibhav comes with rich experience over 25 years in the financial services sector.  Prior to joining Abakkus as Chief Executive Officer, Vaibhav worked with Whiteoak Capital Asset Management Limited as Head Sales managing the retail distribution partnerships across India. He worked with Aditya Birla Sun Life AMC for 14 years and served in various roles across North, South and West India. He has experience in retail sales and distribution and has worked with organisations like ICICI Prudential AMC, IDBI Principal AMC and Franklin Templeton (erstwhile Kothari Pioneer Mutual Fund).
<b>Mr. Suresh Rajgor</b>	Chief Operations Officer	41 Years	B. Com, Chartered Accountant	Suresh is a finance professional with over 17 years of experience in Operations, Finance, and Treasury functions within the mutual fund industry. As Chief Operations Officer at Abakkus Investment Managers Private Limited, he leads the AMC's Mutual Fund Operations and Customer Service functions, playing a pivotal role in the operationalization and scaling of the AMC setup. His core responsibilities include managing fund accounting, unit administration, treasury operations, and investor servicing. Prior to joining Abakkus, Suresh held leadership roles at Aditya Birla Sun Life AMC Ltd., where he contributed significantly across Mutual Fund Treasury Operations, Financial Planning, and Accounts.
<b>Mr. Rambabu Peddireddi</b>	Chief Information Security Officer	58 Years	PGDBA (MBA), IIM Ahmedabad, B.E. Computer Science & Engineering,	Mr. P Rambabu is an experienced IT management professional with about 32 years of experience leading Information Technology in large banks (in India and Middle East) and manufacturing sectors. He is an Engineering graduate in Computer Science and Engineering from College of Engg. Guindy, Chennai. He has extensive experience in IT management, Governance, Application Development, Infrastructure Management, Information and Cyber Security, large program management, leading large scale Digital transformations in financial services. Prior to joining Abakkus, Ram served as Chief Information Officer (CIO) for one of the largest Islamic Bank in Qatar where he contributed to the success of the largely acclaimed Digital Transformation initiative. Ram has worked at global firms such as CIO at First Gulf Bank (now FAB) in UAE, Standard Chartered Bank in India and Asian Paints.



<b>Mr. Sanjay Doshi</b>	Head of Investments & Research	45 Years	CFA, CFA Institute MBA Finance, NMIMS, Chartered Accountant, B. Com	Mr. Sanjay Doshi has over 20 years of experience in Equity Research and Fund Management. Prior to joining Abakkus Mutual Fund, Sanjay has worked with leading financial institutions like Nippon Life India Asset Management, Macquarie Securities and J.P. Morgan. He has managed and was associated with flexi cap, midcap and thematic mandates at Nippon Life India Asset Management. He has covered varied sectors like autos, cap goods, building material, aviation, information technology, metals, utilities, and others at Nippon Life India Asset Management, Macquarie Securities and JP Morgan over the last two decades.
<b>Mr. Yash Dave</b>	Chief Risk Officer	32 Years	M. Com, University of Mumbai	Mr. Yash is a Risk, compliance and Finance professional with nearly 10 years of experience in the risk management, regulatory compliance, taxation, audits, and financial operations. His prior experience spans across Portfolio Management Services (PMS) and Alternate Investment Funds (AIF), and Consultancy firms where he was involved in regulatory compliances, risk monitoring, audit, and financial oversight. He has also worked extensively in the domains of statutory, tax audits, direct and indirect taxation, with a strong focus on regulatory adherence and operational efficiency. In his current role as Chief Risk Officer of a mutual fund, he is responsible for overseeing the overall risk across the AMC and Investments.
<b>Mr. Lijo Varghese</b>	Compliance Officer	35 Years	Company Secretary, LLB, B.Com	With over 12 years of experience in the Corporate, Capital Markets, and Financial Services industry, Lijo Varghese has developed deep expertise in navigating complex regulatory frameworks across a wide spectrum of financial entities, including Mutual Funds, Portfolio Management Services (PMS), Alternative Investment Funds (AIF), Registered Investment Advisors (RIA), Offshore Investment Funds, and Non-Banking Financial Companies (NBFCs). His core competencies span regulatory compliance, anti-money laundering (AML), risk supervision and controls, and cybersecurity. Lijo brings a strategic and detail-oriented approach to managing both litigation and non-litigation matters, offering in-house legal advisory services, negotiating contracts, and ensuring adherence to SEBI regulations, internal audit protocols, and corporate governance standards.
<b>Mr. Prashant Shelar</b>	Dealer	43 Years	B.Com	Mr. Prashant Shelar is a seasoned investment professional with over 18 years of experience across both the buy-side and sell-side of the capital markets. He holds a Bachelor of Commerce degree from Shivaji University, Kolhapur. Mr. Shelar has a strong command over the cash and F&O segments. Servicing domestic Institutions and HNI Clients segment. Prior to joining the Abakkus Mutual Fund, he worked with PGIM India Mutual Fund, Motilal Oswal Mutual Fund and Emkay Global Financial Services.

<b>Mr. Suraj Pingulkar</b>	Dealer	36 Years	B. Com, MBA	Suraj is dynamic and detail-oriented finance professional with over 8 years of experience in Portfolio Management Services (PMS) operations, specializing in end-to-end portfolio administration, regulatory compliance, and client servicing. Proven ability to streamline operational workflows, ensure accurate trade execution and reconciliation, and maintain high standards of reporting and documentation. Adept at coordinating with fund managers and custodians to ensure seamless portfolio management and adherence to SEBI guidelines.
<b>Mr. Sanjay Joshi</b>	Investor Relations Officer	31 Years	B.Sc (Information and Technology)	Sanjay comes with experience of over 5 years in the financial services sector. Prior to joining Abakkus as Investor Relations Officer, Sanjay worked with Bajaj Finserv Mutual Fund in investor services and investor grievance redressal.

#### Procedure followed for Investment decisions

1. The AMC has put in place an Investment Policy which provides a framework for undertaking investments for various schemes managed by Abakkus Investment Managers Private Limited. The Investment Policy prescribes framework for undertaking investments in equity, fixed income securities and such other securities as specified in the Scheme Information Document of various schemes and as permitted by SEBI from time to time.
2. The Fund Manager of the concerned scheme(s) shall be responsible for undertaking buy/sell decisions of securities in portfolio of various scheme(s). Investment decisions taken by the Fund Manager shall be guided by the framework prescribed in the Investment Policy. Research Reports shall be prepared for undertaking investments in various securities. The Fund Manager shall be responsible for performance of various mutual fund scheme(s).
3. Investment decisions taken for various scheme(s) shall be recorded in accordance with the requirements prescribed in SEBI MF Regulations and applicable Circulars/Guidelines.
4. The Investment Committee shall meet periodically and shall undertake review of fund management activities including scheme(s) performance, portfolio of the scheme(s), asset allocation etc. The Investment Committee will be headed by the Chief Executive Officer.
5. Review of scheme(s) performance will also be undertaken by the Board of Directors of AMC and Trustee Company in the Board Meeting. Scheme(s) performance will also be compared with the respective scheme(s) benchmark.
6. The AMC shall ensure that all investment decisions are taken in the interest of unit holders of the scheme(s) and in compliance with SEBI MF Regulations and various Circulars, Guidelines etc issued from time to time pertaining to investments.

#### III. Service providers

##### 1. Custodian

**Name:** DEUTSCHE BANK AG

**Address:** 4th Floor, Nirlon Knowledge Park, Block 1, Western Express Highway, Goregaon (East), Mumbai - 400063 Maharashtra, India

**Phone:** 022 - 71584040

**SEBI REGISTRATION NO.:** IN/CUS/003

##### 2. Registrar and Transfer Agent



**Name:** KFin Technologies Limited

**Address:** Selenium, Tower B, Plot No 31 & 32, Financial District, Nanakramguda, Serilingampally, Hyderabad - 500032 Telangana, India

**Phone:** 040 - 6716 2222

**SEBI REGISTRATION NO.:** INR000000221

The Board of the Trustees and the AMC have ensured that the Registrar has adequate capacity to discharge responsibilities with regard to processing of applications within the time limit prescribed in the SEBI (Mutual Funds) Regulations, 1996 and also has sufficient capacity to handle investor complaints.

### 3. Statutory Auditor of the Mutual Fund

**Name:** Chokshi & Chokshi LLP

**Phone:** + 91 (022) 23836900

**Address:** Ground Floor, Raghavji 'B' Bldg., Raghavji Road, Off Kemps Corner, Mumbai - 400 036, Maharashtra, India

### 4. Legal Counsel

The AMC shall, if required, appoint external legal counsel based on the matter under consideration.

### 5. Fund Accountant

**Name:** Deutsche Bank AG

**Address:** 4<sup>th</sup> Floor, Nirlon Knowledge Park, Block 1, Western Express Highway, Goregaon (East), Mumbai - 400063 Maharashtra, India

**Phone:** 022 71584040

### 6. Collecting Bankers

**Name:** HDFC Bank Ltd

**Address:** HDFC Bank Limited Senapati Bapat Marg, Lower Parel (West), Mumbai - 400 013, Maharashtra, India

**SEBI registration number –** INBI00000063

**Name:** ICICI Bank Ltd

**Address:** Landmark, Race Course Circle, Vadodara, Gujarat, 390007

**SEBI registration number –** INBI00000004

**Name:** Kotak Mahindra Bank Ltd

**Address:** 27BKC, C 27, G Block, Bandra Kurla Complex, Bandra (East), Mumbai - 400051, Maharashtra, India

**SEBI registration number –** INBI00000927

## IV. Condensed financial information (CFI)

(For all the schemes launched by the MF during the last three fiscal years, excluding the merged schemes)

Not applicable as this is a new Mutual Fund in existence with effect from August 29, 2025.

## V. Risk Factors

### 1. Standard Risk Factors

#### a. Standard Risk Factors for investments in Mutual Fund

Mutual Funds and securities investments are subject to market risks and there can be no assurance or guarantee that the objectives of the Scheme will be achieved.

- a) Investment in Mutual Fund Units involves investment risks such as trading volumes, settlement risk, liquidity risk, default risk including the possible loss of principal.

- b) As the price/value/interest rate of the securities in which the Scheme invests fluctuates, the value of your investment in the Scheme may go up or down.
- c) Past performance of the Sponsor/AMC/Mutual Fund does not guarantee future performance of the Scheme.
- d) The Schemes of the mutual fund does not in any manner indicate either the quality of the Scheme or its future prospects and returns.
- e) The settler of the Mutual Fund is not responsible or liable for any loss resulting from the operation of the Scheme beyond the initial contribution of Rs. 10,000 made by it towards setting up the Fund.
- f) The present Schemes do not guarantee or assure returns.
- g) The Sponsor, their affiliates, associates, subsidiaries, the Mutual Fund and the AMC may invest directly or indirectly in the Scheme, over a period of time; subject to the SEBI (Mutual Funds) Regulations. These entities may acquire a substantial portion of the Scheme's Units and collectively constitute a major investor in the Scheme. Accordingly, Redemption of Units held by such entities may have an adverse impact on the Scheme because the timing of such Redemption may impact the ability of other Unit holders to redeem their Units.
- h) Different types of Securities in which the Scheme would invest as given in this Scheme Information Document carry different levels and types of risks. Accordingly, the Scheme's risk may increase or decrease depending upon its investment pattern. For example, equity and equity related securities carry a higher amount of risk than debt securities. Investment decisions made by the AMC may not always be profitable.

**b. Risk factors of not maintaining average AUM of Rs. 20 crore on half yearly rolling basis**

Open ended debt oriented schemes shall maintain an average AUM of Rs. 20 Crore on half yearly rolling basis. In case, the average AUM falls below Rs. 20 Crore, the AMC shall scale up the AUM of such Scheme within a period of six months so as to maintain the average AUM of Rs. 20 Crore on half yearly rolling basis, failing which the Scheme shall be wound up in accordance with the provisions of Regulation 39 (2) (c) of SEBI (Mutual Funds) Regulations, 1996 as amended from time to time.

**c. Risks associated with different derivative strategies**

**Systematic Risk:** Systematic Risk is the risk associated with the entire market. Unlike unsystematic risk, it is not linked to a specific security or sector. Systematic risk is a market risk which can be due to macro-economic factors, news events, etc.

**Mark to Market Risk:** This risk is on account of day to day fluctuations in the underlying Security and its derivative instrument, which can adversely impact the portfolio.

**Credit Risk:** Credit risk in derivative transactions arises if the counterparty fails to fulfill its obligations. In exchange-traded derivatives, this risk is generally mitigated through the clearing corporation. In over-the-counter (OTC) contracts, the risk may be higher, though no principal is exchanged in most cases.

**Interest rate risk:** Derivatives carry the risk of adverse changes in the price due to change in interest rates.

**Basis Risk:** When a security is hedged using a Derivative, the change in price of the security and the change in price of the Derivative may not be fully correlated leading to basis risk in the portfolio.

**Liquidity risk:** During the life of the Derivative, the benchmark might become Illiquid and might not be fully capturing the interest rate changes in the market, or the selling, unwinding prices might not reflect the underlying assets, rates and indices, leading to loss of value of the portfolio.

**Model Risk:** Derivatives may be priced using valuation models. If the model is incorrect or if incorrect assumptions are used, it may lead to mispricing and potential losses in the Scheme.

**Trade Execution:** Risk where the final execution price is different from the screen price, leading to dilution in the spreads.

**Systemic Risk:** In the case of OTC derivatives, the default of one participant can lead to a cascading effect across counterparties, potentially disrupting the entire financial system.

**Leverage Risk:** Derivatives are inherently leveraged instruments. A small movement in the price of the underlying asset can result in a disproportionately large impact—positive or negative—on the value of the derivative position.

**Execution and Strategy Risk:** The effectiveness of derivative strategies depends on the fund manager’s ability to identify and execute them efficiently. There is no assurance that such strategies will achieve the intended objective or result in positive returns. Investment decisions involve uncertainties and may not always be profitable

**The scheme(s) may invest in various derivative products in accordance with and to the extent permitted under the regulations from time to time.**

Derivatives are financial contracts of pre-determined fixed duration, like stock Futures/options and index futures and options, whose values are derived from the value of an underlying primary financial instrument such as: Equities, Interest rates, Exchange rates.

**Derivative products are specialized instruments that require investment techniques and risk analysis which are different from those associated with stocks and other traditional securities.**

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.

**d. Other risk factors-**

**i. Risk associated with investments in Corporate Debt Market Development Fund (CDMDF)**

(Applicable only for open ended debt-oriented schemes of the Fund)

**Backstop facility in form of investment in Corporate Debt Market Development Fund**

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 managers of the aforementioned Schemes to better generate liquidity during market dislocation to help the schemes fulfill liquidity obligations under stress situations.

In accordance with the requirement of regulation 43A of SEBI (Mutual Funds) Regulations, 1996 read with SEBI circular no. SEBI/HO/IMD/PoD2/P/CIR/2023/129 dated July 27, 2023, on Investment by Mutual Fund Schemes in units of Corporate Debt Market Development Fund, the aforementioned schemes 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 scheme 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.

The 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.

**ii. Stress Testing:**

The Investment Manager conducts Stress Tests on the Asset side, i.e. Portfolio assets on key aspects like Interest Rate Risk, Credit Risk and Liquidity Risk. These are done at an aggregate portfolio level to evaluate the impact of NAV from each of these risks. These NAV impact figures are then compared to Thresholds for monitoring and any action, if deemed

necessary. The stress test is performed using the methodology and periodicity as mandated by AMFI in consultation to SEBI, as amended from time to time.

**iii. Risk associated with Swing Pricing:**

Swing pricing is a mechanism that allows a mutual fund to adjust the Net Asset Value (NAV) of a scheme to pass on the costs of large-scale investor subscriptions or redemptions to the transacting investors, thereby protecting the interests of remaining investors. Swing pricing shall be made applicable to all unitholders at PAN level with an exemption for redemptions upto Rs. 2 lacs for each scheme

**Valuation Risk:** There may be a deviation between the swung NAV and the actual value of the portfolio. The methodology used for swinging may not always accurately capture transaction costs or liquidity premiums.

**Operational Risk:** Implementation of swing pricing involves complex systems and procedures. Any error in calculation, communication, or application may result in unintended NAV adjustments or unfair treatment of investors.

**Transparency and Predictability:** As swing pricing thresholds and factors may not be publicly disclosed in full detail, investors may face difficulty in estimating the NAV impact at the time of transaction.

**Market Behavior Risk:** If investors anticipate the application of swing pricing, they may time their transactions accordingly, leading to distortions in fund flows and liquidity management.

**Fairness Perception:** There is a risk that some investors perceive swing pricing as unfair, especially in the absence of clear understanding or communication about its application.

**iv. Risk associated with LRM:**

Liquidity risk refers to the risk that the Scheme may not be able to sell its investments or raise cash to meet redemption requirements in a timely and efficient manner without significantly impacting the market price of assets.

**Execution Risk:** During periods of market stress, the LRM tools may not be implemented effectively or timely, reducing their intended impact.

**Valuation Risk:** LRM measures such as side pocketing may lead to valuation challenges for segregated assets, especially when they are illiquid or downgraded.

**Reputational Risk:** Activation of LRM measures may create negative investor sentiment, especially if perceived as restrictive or reactive.

**Investor Behavior Risk:** Anticipation or implementation of LRM tools can lead to herding behavior or a surge in redemptions, aggravating liquidity stress.

**Regulatory Risk:** Any changes in regulatory stance regarding use of LRM tools could affect their applicability, timing, and investor communication requirements.

**2. Special Considerations:**

- Prospective investors should study this Scheme Information Document and Statement of Additional Information carefully in its entirety and should not construe the contents hereof as advice relating to legal, taxation, financial, investment or any other matters and are advised to consult their legal, tax, financial and other professional advisors to determine possible legal, tax, financial or other considerations of subscribing to or redeeming Units, before making a decision to invest/redeem/hold Units.
- Neither this Scheme Information Document ("SID"), SAI nor the Units have been registered in any jurisdiction. The distribution of this Scheme Information Document or Statement of Additional Information in certain jurisdictions

may be restricted or totally prohibited to registration requirements and accordingly, persons who come into possession of this Scheme Information Document or Statement of Additional Information are required to inform themselves about and to observe any such restrictions and/ or legal compliance requirements.

- The AMC, Trustee or the Mutual Fund have not authorized any person to issue any advertisement or to give any information or to make any representations, either oral or written, other than that contained in this Scheme Information Document or the Statement of Additional Information or as provided by the AMC in connection with this offering. Prospective Investors are advised not to rely upon any information or representation not incorporated in the Scheme Information Document or Statement of Additional Information or as provided by the AMC as having been authorized by the Mutual Fund, the AMC or the Trustee.
- Redemption due to change in the fundamental attributes of the Scheme or due to any other reasons may entail tax consequences. The Trustee, AMC, Mutual Fund, their directors or their employees shall not be liable for any such tax consequences that may arise due to such Redemptions.
- The Trustee, AMC, Mutual Fund, their directors or their employees shall not be liable for any of the tax consequences that may arise, in the event that the Scheme is wound up for the reasons and in the manner provided in Statement of Additional Information.
- The tax benefits described in this Scheme Information Document and Statement of Additional Information are as available under the present taxation laws and are available subject to relevant conditions. The information given is included only for general purpose and is based on advice received by the AMC regarding the law and practice currently in force in India as on the date of this Scheme Information Document and the Unit holders should be aware that the relevant fiscal rules or their interpretation may change. As is the case with any investment, there can be no guarantee that the tax position or the proposed tax position prevailing at the time of an investment in the Scheme will endure indefinitely. In view of the individual nature of tax consequences, each Unit holder is advised to consult his / her own professional tax advisor.
- The Mutual Fund may disclose details of the investor's account and transactions there under to those intermediaries whose stamp appears on the application form or who have been designated as such by the investor. In addition, the Mutual Fund may disclose such details to the bankers, as may be necessary for the purpose of effecting payments to the investor. The Fund may also disclose such details to regulatory and statutory authorities/bodies as may be required or necessary.
- In case the AMC or its Sponsor or its Shareholders or their affiliates/associates or group companies make substantial investment, either directly or indirectly in the Scheme. Redemption of Units by these entities may have an adverse impact on the performance of the Scheme. This may also affect the ability of the other Unit holders to redeem their units.
- As the liquidity of the Scheme investments may sometimes be restricted by trading volumes and settlement periods, the time taken by the Fund for Redemption of Unit may be significant in the event of an inordinately large number of Redemption Requests or of a restructuring of the Scheme portfolio. In view of this, the Trustee has the right, in its sole discretion, to limit redemptions under unforeseen circumstances / unusual market conditions, may limit the total number of Units which can be redeemed on any Business Day. The same shall be in accordance with Clause 1.12 of SEBI Master Circular dated June 27, 2024 (Restriction on redemption in Mutual Funds).
- Valid PAN/PEARN and KYC is mandatory for all financial transactions including non-investor initiated.
- Currently, as per Section 139AA of the Income Tax Act, 1961, every person who has been allotted a PAN as on July 1, 2017, and who is eligible to obtain an Aadhaar number, shall have to mandatorily link their Aadhaar and PAN, failing which shall attract higher TDS and transaction restrictions. Note: Presently, Aadhaar-PAN linking does not apply to any individual who is (a) residing in the States of Assam, Jammu and Kashmir, and Meghalaya; (b) a non-resident as per the Income Tax Act, 1961 (NRI as per Income Tax records); or (c) of the age of eighty years or more at any time during the previous year; or (d) not a citizen of India. However, these exemptions may change or be revoked later.

### **Risk Management Strategies**

The Fund employs a holistic risk management framework to identify, measure, monitor, and mitigate risks associated with investments in debt and equity markets, in line with SEBI (Mutual Funds) Regulations, 1996, and the Master Circular dated June 27, 2024.

### **Requirement of minimum investors in the scheme:**

All the open-ended schemes shall have a minimum of 20 investors and no single investor shall account for more than 25% of the corpus of the Scheme. However, if such limit is breached during the NFO of the Scheme, the Fund will endeavour to ensure that within a period of three months or the end of the succeeding calendar quarter from the close of the NFO of the Scheme, whichever is earlier, the Scheme complies with these two conditions. In case the Scheme does not have a minimum of 20 investors in the stipulated period, the provisions of Regulation 39(2)(c) of the SEBI (MF) Regulations would become applicable automatically without any reference from SEBI and accordingly the Scheme shall be wound up and the units would be redeemed at applicable NAV. The two conditions mentioned above shall also be complied within each subsequent calendar quarter thereafter, on an average basis, as specified by SEBI. If there is a breach of the 25% limit by any investor over the quarter, a rebalancing period of one month would be allowed and thereafter the investor who is in breach of the rule shall be given 15 days' notice to redeem his exposure over the 25 % limit. Failure on the part of the said investor to redeem his exposure over the 25 % limit within the aforesaid 15 days would lead to automatic redemption by the Mutual Fund on the applicable Net Asset Value on the 15th day of the notice period. The Fund shall adhere to the requirements prescribed by SEBI from time to time in this regard. The above requirements of minimum number of investors and maximum holdings shall not be applicable for Exchange Traded Funds in accordance with SEBI (MF) Regulations.

### **VI. How to apply?**

**This section must be read in conjunction with the Section I-Part I. Highlights/Summary of the Scheme and Section II-E. Other Scheme Specific Disclosures of the SID of the Scheme(s) of the Fund:**

1. The application form/Transaction Slip for the Sale of Units of the respective Schemes/ Plans shall be available and accepted at the office of the ISCs/Official Points of acceptance during their business hours on their respective business days. The same can also be downloaded from the website of the Mutual Fund <https://www.abakkusmf.com>.
2. Applications must be completed in **BLOCK LETTERS** in English.
3. In case the Scheme name as provided by investor on the application form or transaction slip and on the payment instrument are different, the application shall be processed and units allotted at Applicable NAV of the Scheme as mentioned in the application/transaction slip duly signed by investor, provided that the application is valid and complete in all other aspects.
4. Applications filled up and duly signed by all joint investors should be submitted along with the cheque/draft/other payment instrument or instruction to a designated ISC/Official Point of acceptance of AMC or the Registrar as specified. The signature should be in English or in any of the Indian languages specified in the eighth schedule of the Constitution of India. Thumb Impressions must be attested by a magistrate or a notary public or a special executive magistrate under his/her official seal. Applications by minors should be signed by the guardians. In case of HUF, the Karta should sign on behalf of the HUF.
5. All cheques and bank drafts must be drawn in favour of "**a Specific Scheme**" and the name of the respective Plan should also be mentioned and crossed "A/c Payee only". A separate cheque or bank draft must accompany each application/each scheme. Investors must use separate application forms for investing simultaneously in more than one Plan of the Scheme subject to the minimum subscription requirements under each Plan. If the amount mentioned on the application is different from the amount mentioned on the accompanying cheque or bank/demand draft or the amount is not mentioned in the application form, then the amount on the cheque will be treated as the application amount and the application will be processed accordingly. In case the name of the Scheme/Plan mentioned on the application form differs from the name mentioned on the accompanying payment instrument, then the application will be treated as an application for the Scheme/Plan mentioned on the application form.
6. All cheques and bank drafts accompanying the application form should contain the application form number / folio number, scheme name and name of first investor on its reverse.
7. In order to protect the interest of Investors from fraudulent encashment of cheques, the current SEBI Regulations, have made it mandatory for Investors to mention in their Application/Redemption request, their bank name, branch,



address, account type and account number. 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.

8. In terms of Paragraph 14.11 of SEBI Master Circular dated June 27, 2024, Permanent Account Number (PAN) shall be the sole identification number for all participants transacting in the securities market, irrespective of the amount of transaction with effect from July 2, 2007. Accordingly, it is mandatory for investors to provide their PAN along with a self-attested copy of PAN Card. If the investment is being made on behalf of a minor, the PAN of the minor or father or mother or the guardian, who represents the minor, should be provided. Applications received without PAN/PAN card copy will be rejected.

Further in terms of Paragraph 14.11 of SEBI Master Circular dated June 27, 2024, it is clarified that PAN may not be insisted in the case of Central Government, State Government, and the officials appointed by the courts example Official liquidator, Court receiver etc. (under the category of Government) for transacting in the securities market. However, the aforementioned clarification will be subject to the mutual fund verifying the veracity of the claim of the specified organizations, by collecting sufficient documentary evidence in support of their claim for such an exemption.

Further, as per Paragraph 14.11 of SEBI Master Circular dated June 27, 2024, it has been clarified to exempt investors residing in the state of Sikkim from the mandatory requirement of PAN for their investments in mutual funds. However, this would be subject to the Mutual Fund verifying the veracity of the claim of the investors that they are residents of Sikkim, by collecting sufficient documentary evidence including strict compliance with the applicable 'KYC' norms. The requirements pertaining to PAN & KYC shall be as prescribed by applicable Regulations read with various amendments, circulars, notifications issued from time to time.

9. Pursuant to implementation of Know Your Customer (KYC) norms under Prevention of Money Laundering Act, 2002 (PMLA) and in accordance with Association of Mutual Funds in India (AMFI) circular 35/MEM-COR/62/10-11 dated October 07, 2010 and communication under reference 35/MEM-COR/81/10-11 dated December 23, 2010 it may be noted that KYC Compliance is mandatory for all Individual Investors with effective January 01, 2011 irrespective of the amount of investment.

SEBI via Paragraph 16.2.4.4 of SEBI Master Circular dated June 27, 2024, introduced a uniform KYC compliance procedure for all the investors dealing with SEBI intermediaries on or after January 01, 2012, to reduce hardship and help investors. SEBI also issued KYC Registration Agency ("KRA") Regulations, 2011 and the guidelines in pursuance of the said Regulations and for In-Person Verification ("IPV").

Pursuant to SEBI Circular No. CIR/MIRSD/09/2013 dated October 8, 2013, e-KYC service launched by Unique Identification Authority of India (UIDAI) is a valid process for KYC verification, which requires authorization to access investors' data through UIDAI system.

The PMLA Requirements and related guidelines/circulars issued by the SEBI and AMFI states that Know Your Client (KYC) formalities are required to be completed for all Unit Holders, including Guardians and Power of Attorney holders, for any investment (whether new or additional purchase) made in mutual funds. All Mutual Funds are required to verify the identity and maintain records of all their investors through the mandate KYC process. The Investor needs to submit the necessary documents to the POS Location of KRA.

Any subsequent changes in address or other details could be intimated to any of the POS (with relevant documentary evidence) and the same will get updated in all the mutual funds where the investor has invested.

Investors have to provide the relevant documents and information ONLY ONCE for complying with KYC. After that Investors could use same with all SEBI registered intermediaries merely attaching a copy of the KYC acknowledgement slip with the application form/transaction slip when investing for the first time in every folio (Post KYC) in each Mutual Fund house, without the necessity to submit the KYC documents again.

The Application Forms/Change Request Forms for KYC are available at the ISC of AMC and KFin Technologies Limited and at the website of Abakkus Mutual Fund <https://www.abakkusmf.com>.

SEBI had vide circular no. CIR/MIRSD/ 66 /2016 dated July 21, 2016 read along with SEBI Circular no. CIR/MIRSD/120 /2016 dated November 10, 2016, has intimated about operationalization of Central KYC Records Registry (CKYCR). Further, AMFI vide circular dated December 22, 2016 has prescribed CKYC forms which shall be applicable for prospective customers.

Accordingly, with effect from February 1, 2017, any new customer who has not done KYC earlier shall fill the new CKYC KRA-KYC form. If such new customer wishing to invest and get KYC done has filled up old KRA KYC form, such customer would also have to fill a Supplementary CKYC Form or fill the new CKYC-KRA KYC form. The forms are available on the website of the fund, viz. (www.Abakkusmutualfund.com) and at the official points of acceptance of transactions of the AMC. The KYC requirements shall be governed by SEBI Circulars/ notifications and AMFI Guidelines which may change from time to time.

10. Applicants must satisfy the minimum Application Amount requirements mentioned in the SID of the respective schemes of the Mutual Fund.

11. Quoting of Employee Unique Identification Number ("EUIN") in the Application Form: Pursuant to SEBI Circular no. CIR/IMD/DF/21/2012 dated September 13, 2012 and various AMFI Guidelines issued in this regard, investors are requested to disclose the details of EUIN along with the AMFI Registration Number ("ARN") of the distributor and the sub-distributor while submitting the applicable transaction request (excluding redemption).

**In this regard the investors are requested to note the following:**

- i) Kindly use the new application forms/transaction forms which have spaces for ARN Code, Sub broker code and the EUIN.
  - ii) EUIN will not be applicable to overseas distributors who comply with the requirements of AMFI guidelines
  - iii) Where the EUIN is left blank, the declaration by the investor should state that EUIN space has been left blank as the transaction is an "execution only" transaction.
12. Applications not complete in any respect are liable to be rejected.
13. The AMC/Trustee retains the sole and absolute discretion to reject any application.

● **Compliance with Foreign Accounts Tax Compliance Act (FATCA)/Common Reporting Standards (CRS)**

The Government of India and the United States of America (US) have reached an agreement in substance on the terms of an Inter- Governmental Agreement (IGA) and India is now treated as having an IGA in effect from April 11, 2014. On similar lines the Organization of Economic Development (OECD) along with G-20 countries has released a 'Standard for Automatic Exchange of Financial Account Information in Tax Matters' commonly known as Common Reporting Standard ('CRS'). India is signatory to the Multilateral Competent Authority Agreement (MCAA) for the purposes of CRS. Under FATCA/CRS provisions, Financial Institutions are obligated to obtain information about the financial accounts maintained by investors and report to the local Government/ notified tax authorities. In accordance with FATCA and CRS provisions, the AMC/Mutual Fund is required to undertake due diligence process and identify foreign reportable accounts and collect such information/documentary evidences of the FATCA/ CRS status of its investors/Unit holders and disclose such information (through its agents or service providers) as far as may be legally permitted about the holdings/ investment returns to US Internal Revenue Service (IRS)/any other foreign government or the Indian Tax Authorities, as the case may be for the purpose of onward transmission to the IRS/any other foreign government pursuant to the new reporting regime under FATCA/CRS. FATCA/CRS due diligence will be directed at each investor/ Unit holder (including joint investor/Unitholder) and on being identified as a reportable person, all the folios will be reported. In case of folios with joint holders, the entire account value of the investment portfolio will be attributable under each such reportable person. An investor/Unit holder will therefore be required to comply with the request of the AMC/Mutual Fund to furnish such information as and when sought by the AMC for the AMC/Mutual Fund to comply with the information reporting requirements stated in IGA/MCAA and circulars issued by SEBI/AMFI in this regard. The information disclosed may include (but is not limited to) the identity of the investors/Unitholder(s) and their direct or indirect beneficiaries, beneficial owners and controlling persons. Investors/Unitholders should consult their own tax advisors regarding FATCA/CRS requirements with respect to their own situation. The AMC/Mutual Fund reserves the right to reject any application/freeze any folio(s) held directly or beneficially for transactions in the event the applicant/Unitholder(s) fail to furnish the relevant information and/or documentation in accordance with FATCA/CRS provisions and as requested by the AMC/Mutual Fund.

● **Ultimate Beneficial Owner(s) (UBO(s)):**



Pursuant to SEBI Master Circular No. SEBI/HO/MIRSD/MIRSD-SEC-5/P/CIR/2023/022 dated February 03, 2023 read along with the latest amendments including SEBI Circular no. SEBI/HO/MIRSD/MIRSDSECFATF/P/CIR/2023/091 dated June 16, 2023 on identification of Beneficial Ownership, investors (other than Individuals) are required to provide details of Ultimate Beneficial Owner(s) ("UBO(s)") and submit proof of identity (viz. PAN with photograph or any other acceptable proof of identity prescribed in common KYC form) of UBO(s).

As per these guidelines, UBO means 'Natural Person', or persons who ultimately own, control or influence a client and/or persons on whose behalf a transaction is being conducted, and includes a person who exercises ultimate effective control over a legal person or arrangement. Investors are requested to refer to the 'UBO Declaration' for details of UBO.

In accordance with AMFI Best practices guidelines Circular no. 62/2015-16 dated September 18, 2015, it is mandatory for investors to provide beneficial ownership details failing which the transaction for additional subscription (including switches) will be liable to be rejected.

However, the investor or the owner of the controlling interest is a company listed on a stock exchange or is a majority-owned subsidiary of such a company, is exempted from the provisions of UBO.

- **Application incomplete in any respect (other than mentioned above) will be liable to be rejected**

In order to protect investors from frauds, it is advised that the Application Form number/folio number, scheme name and name of the first investor should be written overleaf the cheque/draft, before they are handed over to any courier/messenger/ distributor/ISC.

In order to protect investors from fraudulent encashment of cheques, Regulations require that cheques for Redemption of Units specify the name of the Unit Holder and the bank name and account number where payments are to be credited. Hence, all applicants for Purchase of Units must provide a bank name, bank account number, branch address, and account type in the Application Form.

- **Application through MF utility platform:**

Abakkus Investment Managers Private Limited has entered into an agreement with MF Utilities India Private Limited ("MFUI"), a "Category II – Registrar to an Issue" under SEBI (Registrars to an Issue and Share Transfer Agents) Regulations, 1993, for usage of MF Utility ("MFU") - a shared services initiative of various Asset Management Companies, which acts as a transaction aggregation portal for transacting in multiple Schemes of various Mutual Funds with a single form and a single payment instrument.

Accordingly, all financial and non-financial transactions pertaining to the schemes of Abakkus Mutual Fund except Exchange Traded Funds (ETFs) can be done through MFU either electronically on <https://www.mfuonline.com> as and when such a facility is made available by MFUI or physically through the authorized Points of Service ("POS") of MFUI with effect from the respective dates as published on MFUI website against the POS locations.

The list of POS of MFUI is published on the website of MFUI at [www.mfuindia.com](http://www.mfuindia.com) as may be updated from time to time. The Online Transaction Portal of MFU i.e. <https://www.mfuonline.com> and the POS locations of MFUI will be in addition to the existing Official Points of Acceptance ("OPA") of Abakkus MF.

The uniform cut-off time as prescribed under SEBI (Mutual Funds) Regulations, 1996 and as mentioned in the Scheme Information Document (SID)/Key Information Memorandum (KIM) of respective schemes of Abakkus Mutual Fund shall be applicable for applications received on the portal of MFUI i.e. [www.mfuonline.com](https://www.mfuonline.com). However, investors should note that transactions on the MFUI portal shall be subject to the eligibility of the investors, any terms & conditions as stipulated by MFUI/Abakkus Mutual Fund/Abakkus Investment Managers Private Limited from time to time and any law for the time being in force. Investors are requested to note that, MFUI will allot a Common Account Number ("CAN"), a single reference number for all investments in the Mutual Fund industry, for transacting in eligible schemes of various Mutual Funds through MFU and to map existing folios, if any. Investors can create a CAN by submitting the CAN Registration Form (CRF) and necessary documents at the MFUI POS.

Abakkus Investment Managers Private Limited and/or its Registrar and Transfer Agent (RTA) shall provide necessary details to MFUI as may be needed for providing the required services to investors/distributors through MFU. Investors are requested to visit the websites of MFUI i.e. <https://www.mfuonline.com> to download the relevant forms.

For any queries or clarifications related to MFU, please contact the Customer Care of MFUI on 1800-266-1415 (during the business hours on all days except Sunday and Public Holidays) or send an email to [clientservices@mfuindia.com](mailto:clientservices@mfuindia.com).

● **StAR MF facility**

Investors can also subscribe to the Units of the Scheme through MFSS and/or NMF II facility of NSE, BSE StAR MF facility of BSE and ICEX. Stock Exchanges are required to allow investors to directly access infrastructure of recognized stock exchange to purchase and redeem Mutual Fund units from Mutual Fund/AMC. Investors can avail this facility as and when the same is made available by Stock Exchanges.

KYC compliant investors can registered themselves on Stock Exchanges by providing their PAN and creating their profile on the said platform. Stock Exchanges will allot the identification number upon receipt of signed and scanned registration form. Further upon receipt of authorisation by the Stock Exchanges platform the investor can commence the transaction.

● **Payment Mode**

Payment can be made by either:

- cheque;
- draft (i.e. demand draft or bank draft); or
- a payment instrument (such as pay order, banker's cheque, etc.)
- a payment mode as may be approved by the AMC from time to time.
- Real Time Gross Settlement (RTGS) / National Electronic Fund Transfer (NEFT) / National Automated Clearing House (NACH) / Net banking / Unified Payment Interface (UPI) / Immediate Payment Service (IMPS) or such other modes as may be introduced by RBI from time to time and made available by the AMC.

**Resident Investors**

Applications accompanied with cash, money orders, postdated cheques [except for Systematic Investment Plan (SIP)], third party cheques, outstation cheques and postal orders are liable to be rejected. Cheques drawn on the bank not participating in the clearing house will not be accepted.

The AMC will reimburse demand draft charges subject to maximum of Rs. 1,000/- per transaction for purchase of units by investors residing at location where the ISC's/Official Points of Acceptance are not located as per the table below:

Amount of Investments	Rate of Charge of Demand Drafts
Upto Rs 10,000	At actuals subject to a maximum of Rs. 50
Above Rs 10,000	Rs. 0.50 per Rs. 1000
Maximum Charges	Rs. 1,000

The AMC reserves the right to refuse bearing of demand draft charges, in case of investments made by the same applicant(s) through multiple applications at its own discretion which will be final and binding on the investor. Investors residing at places other than where the ISC's/Official Point of Acceptance are located, are requested to make the payment by way of demand draft(s) after deducting charges as per the rates indicated in the above table. The AMC reserves the right to insist for the proof of demand draft charges. It may be noted that additional charges, if any, incurred by the investor over and above the levels indicated above will not be borne by the AMC. No demand draft charges will be borne by the AMC for purchase of Units by investors residing at such locations where the ISC's/Official Points of Acceptance are located. Reimbursement of demand draft charges will be applicable for all equity schemes and hybrid schemes.

Investors may kindly note that DD charges will not be reimbursed for debt and liquid schemes of the Mutual Fund. Applications accompanied by cheques/drafts not fulfilling the above criteria are liable to be rejected.

- **Through NACH Facility:**

The investors can now make payment of Lumpsum investment or SIP installments through NACH facility. NACH is a centralized system, launched by National Payments Corporation of India (NPCI) with an aim to consolidate multiple Electronic Clearing System (ECS) mandates.

Investors can avail of NACH facility by duly filling up and submitting the SIP Enrolment cum NACH /Auto Debit Mandate Form. A Unique number will be allotted to every mandate registered under NACH called as Unique Mandate Reference Number ("UMRN") which can be used for SIP transactions. The NACH facility shall be available subject to the terms and conditions contained in the Mandate Form and other guidelines as prescribed by NPCI from time to time.

- **Additional mode of payment through Applications Supported by Blocked Amount ("ASBA") in Mutual Funds for investing in New Fund offer (NFO)**

As per Paragraph 14.8 of SEBI Master Circular dated June 27, 2024, an investor can subscribe to the New Fund Offer (NFO) of Mutual Fund launched on or after July 1, 2010, through the ASBA facility by applying for the units offered by the Schemes in the ASBA application form and following the procedure as prescribed therein.

**"Applications Supported by Blocked Amount" or "ASBA"** is an application containing an authorization given by the Investor to block the application money in his specified bank account towards the subscription of Units offered during the NFO of the Schemes of Abakkus Mutual Fund. If an investor is applying through ASBA facility, the application money towards the subscription of Units shall be debited from his specified bank account only if application of the investor is selected for allotment of Units.

Investors under ASBA can also subscribe to NFO of the Schemes by making physical or electronic application through Self Certified Syndicate Bank ("SCSB")

**Benefits of Applying through ASBA facility:**

- The Investor need not issue a cheque or a demand draft, as the investor needs to submit the ASBA application form accompanying an authorization to block the account to the extent of application money towards subscription of units in the NFO. The investor can use the balance money, if any, for other purposes.
- Release/unblocking of blocked funds after allotment is done instantaneously.
- As the application amount remains in the investor's bank account, the investor continues to earn interest till the allotment is made, when an application is made under ASBA facility.
- Refunds of money to the investors do not arise as the application money towards subscription of units is debited only on the allotment of units.

**ASBA Procedure**

- An investor intending to subscribe to the units during NFO through ASBA facility shall submit a duly completed ASBA application form to a SCSB with whom such investor's bank account is maintained.
- The ASBA Application Form towards the subscription of units can be submitted through one of the following modes:
  - submit the form physically with the Designated Branches (DBs) of SCSB ("Physical ASBA"); or
  - submit the form electronically through the internet banking facility offered by the SCSB ("Electronic ASBA").
- An acknowledgement will be given by the SCSB in the form of the counter foil or specifying the application number for reference. Such acknowledgement does not guarantee, in any manner, that the investors will be allotted the units he has applied for.  
**Note:** The application would be rejected by the Bank, if the bank account specified in the ASBA application form does not have sufficient credit balance to meet the application money towards the subscription of units in the NFO.
- On acceptance of physical or electronic ASBA, the SCSB shall block funds available in the specified bank account to the extent of application money specified in ASBA application Form.

- v. Application money towards the subscription of units shall be blocked in the account until (i) allotment of units is made or (ii) the application is rejected.
- vi. SCSBs shall unblock the bank accounts for (i) transfer of requisite money to the Mutual Fund / scheme bank account against each valid application on allotment or (ii) in case the application is rejected.
- vii. The list of SCSBs and their DBs where ASBA application form can be submitted is available on the websites of BSE ([www.bseindia.com](http://www.bseindia.com)), NSE ([www.nseindia.com](http://www.nseindia.com)) and SEBI ([www.sebi.gov.in](http://www.sebi.gov.in)) and shall also be given in the ASBA application form.

#### **Grounds for Technical Rejections of ASBA application forms**

ASBA application forms can be rejected, at the discretion of Registrar and Transfer Agent of Abakkus Mutual Fund or AMC or SCSBs including but not limited on the following grounds:-

- (i) Applications by persons not competent to contract under the Indian Contract Act, 1872, including but not limited to minors, insane persons etc.
- (ii) Mode of ASBA i.e. either physical ASBA or electronic ASBA is not selected or ticked.
- (iii) ASBA application form without the stamp of the SCSB.
- (iv) Application by any person outside India if not in compliance with applicable foreign and Indian laws.
- (v) Bank account details not given/incorrect details given.
- (vi) Duly certified Power of Attorney, if applicable, not submitted along with the ASBA application form.
- (vii) No corresponding records available with the Depositories matching the parameters namely (a) Names of the ASBA applicants (including the order of names of joint holders) (b) DP ID (c) Beneficiary account number or any other relevant details pertaining to the Depository account.

#### **Mechanism for Redressal of Investor Grievances:**

All grievances relating to the ASBA facility may be addressed to the respective SCSBs, giving complete details such as name & address of the applicant, number of units applied for, counterfoil or the application reference given by the SCSBs, DBs or CBs, amount paid on application and the Designated Branch or the collection centre of the SCSB where the application form was submitted.

If the SCSB has not resolved the grievance, investors should write to Kfin Technologies Limited, Registrar and Transfer Agent of Abakkus Mutual Fund.

#### **Non Resident Indians (NRI)/Persons of Indian Origin (PIO), Foreign Institutional Investors**

##### **Repatriation Basis**

In the case of NRIs including PIOs, payment may be made either by inward remittance through normal banking channels or out of funds held in his Non - Resident (External) Rupee Account (NRE)/Foreign Currency (Non-Resident) Account (FCNR). In case Indian rupee drafts are purchased abroad or from Foreign Currency Accounts or Non-resident Rupee Accounts an account debit certificate from the Bank issuing the draft confirming the debit shall also be enclosed.

FII shall pay their subscription either by inward remittance through normal banking channels or out of funds held in Foreign Currency Account or Non-Resident Rupee Account maintained by the FII with a designated branch of an authorised dealer in accordance with the relevant exchange management regulations.

##### **Non-repatriation Basis**

In the case of NRIs/PIOs, payment may be made either by inward remittance through normal banking channels or out of funds held in his NRE/FCNR/Non-Resident Ordinary Rupee Account (NRO). In case Indian rupee drafts are purchased abroad or from Foreign Currency Accounts or Non-resident Rupee Accounts an account debit certificate from the Bank issuing the draft confirming the debit shall also be enclosed.

Returned cheque(s) are liable not to be presented again for collection, and the accompanying Application Form is liable to be rejected. In case the returned cheque(s) are presented again, the necessary charges may be debited to the Investor.

- **Application under Power of Attorney**

An applicant wanting to transact through a power of attorney must lodge the photocopy of the Power of Attorney (POA) attested by a Notary Public or the original POA (which will be returned after verification) within 30 days of submitting the Application Form/Transaction Slip at a Designated ISC's/Official Point of acceptance or along with the application in case of application submitted duly signed by POA holder. Applications are liable to be rejected if the power of attorney is not submitted within the aforesaid period.

- **Application by a non – individual investor**

In case of an application by a company, body corporate, society, mutual fund, trust or any other organisation not being an individual, a duly certified copy of the relevant resolution or document along with the updated Specimen Signature list of Authorised Signatories must be lodged along with the Application Form/Transaction Slip at a Designated ISC's/Official Point of acceptance. Further, the AMC may require that a copy of the incorporation deeds/constitutive documents (e.g. Memorandum and Articles of Association) be also submitted to the ISC's/Official Point of acceptance.

Requests for redemption may not be processed if the necessary documents are not submitted.

- **Mode of Holding**

An application can be made by up to a maximum of three applicants. Applicants must specify the 'mode of holding' in the Application Form.

If an application is made by one Unit Holder only, then the mode of holding will be considered as 'Single'.

If an application is made by more than one Investors, they have an option to specify the mode of holding as either 'Jointly' or 'Anyone or Survivor'.

In either of the cases referred above i.e. application made by one investor/more than one investor, the Fund shall not entertain requests for including any other person as a joint holder once the application has been accepted.

If the mode of holding is specified as 'Jointly', all instructions to the Fund would have to be signed by all the Unit Holders, jointly. The Fund will not be empowered to act on the instruction of any one of the Unit Holders in such cases.

If the mode of holding is specified as 'Anyone or Survivor', an instruction signed by any one of the Unit Holders will be acted upon by the Fund. It will not be necessary for all the Unit Holders to sign.

If an application is made by more than one investor and the mode of holding is not specified, the mode of holding would be treated as 'Anyone or Survivor'.

In all cases, all communication to Unit Holders (including account statements, statutory notices and communication, etc.) will be addressed to the first-named Unit Holder. All payments, whether for redemptions, dividends, etc will be made favouring the first-named Unit Holder.

The first named Unit Holder shall have the right to exercise the voting rights associated with such Units as per the applicable guidelines. Investors should carefully study the paragraphs on “**Transfer and Transmission**” and “**Nomination Facility**” before ticking the relevant box pertaining to the mode of holding in the Application Form.

- **Transaction Charges**

Transaction charges have been removed pursuant to SEBI Circular No. SEBI/HO/IMD/PoD1/CIR/P/2025/115 dated August 08, 2025.

- **Standard process for treatment of business received through suspended distributors:**

Treatment of purchase/switch/SIP/STP transactions received through distributors who are suspended by AMFI shall be as follows:

1. During the period of suspension, no commission shall be accrued or payable to the distributor whose ARN is suspended. During the period of suspension, commission on the business canvassed prior to the date of suspension shall stand forfeited, irrespective of whether the suspended distributor is the main ARN holder or a sub-distributor.
2. All Purchase and Switch transactions, including SIP/STP registered prior to the date of suspension and fresh SIP/STP registrations received under the ARN code of a suspended distributor during the period of suspension, shall be processed under "Direct" Plan" and shall be continued under Direct Plan perpetually. AMC shall suitably intimate to the unitholder(s).

**Note:** If the AMC receives a written request / instruction from the first/sole unitholder to shift back existing assets, future SIP/STP installments or both to Regular Plan under the ARN of the distributor post the revocation of suspension of ARN, the same shall be honored. Investors may be liable to bear capital gains taxes per their individual tax position for such transactions.

3. All Purchase and Switch transactions including SIP/STP transactions received through the stock exchange platforms through a distributor whose ARN is suspended shall be rejected.
4. In cases where the ARN of the distributor is permanently terminated, the unitholders have the following options:
  - a. Switch their existing investments under the Regular Plan to Direct Plan (Investors may be liable to bear capital gains taxes per their individual tax position for such transactions);
  - b. Continue their existing investments under the Regular Plan under ARN of another distributor of their choice

● **Additional facilities for subscription/redemption/switch of units:**

**Transactions through Electronic Mode**

The Mutual Fund may allow subscriptions of Units by electronic mode including through the various web sites with which the AMC would have an arrangement from time to time.

Subject to the investor fulfilling certain terms and conditions as stipulated by AMC from time to time, the AMC, Mutual Fund, Registrar or any other agent or representative of the AMC, Mutual Fund, the Registrar may accept transactions through any electronic mode including through fax/web/ phone transactions as permitted by SEBI or other regulatory authorities.

For details investors are advised to refer to the SID of the respective Scheme(s) of the Mutual Fund.

Investors may undertake transactions viz. purchase/redemption/switch etc. through its official website [www.abakkusmf.com](http://www.abakkusmf.com) and may also submit transactions in electronic mode offered by specified banks, financial institutions, distributors etc., with whom AMC has entered or may enter into specific arrangements including through secured internet sites operated by RTA. Accordingly, the servers (maintained at various locations) of the AMC and RTA will be the official point of acceptance for all such online/ electronic transaction facilities offered by the AMC.

- A. For the purpose of determining the applicable NAV in accordance with SEBI (Mutual Funds) Regulations, 1996, the system generated date and time of the Email received by the Server of the AMC/RTA will be considered.
- B. The Sender agrees and acknowledges and is aware that there may be delay in delivery / difference in the date and time of the email received at the server of the AMC and the date and time of the server through which investor has sent the email and also the AMC server may not receive / reject the email sent by the Sender at all.
- C. To consider cut off timing and availability of funds for utilization for determining the applicable NAV the provisions of the respective Scheme Information Documents of the Scheme will be considered.

The uniform cut off timing for applicability of NAV prescribed under SEBI (Mutual Funds) Regulations, 1996 and as mentioned in Scheme Information Documents ('SIDs')/Key Information Memorandums ('KIMs') of respective schemes of the Fund will be applicable for transactions received through email. The time of receipt of transaction recorded on the Designated Email and timing of receipt of funds shall be considered as final and binding for the purpose of determining applicability of NAV.



The Sender agrees and acknowledges that Electronic Facility is not a secure means of giving instructions / transaction's and is fully aware of the risks involved including but not limited to such instructions / transaction's requests being inaccurate, imperfect, ineffective, illegible, having a lack of quality, clarity, garbled, altered, distorted, not timely etc.

The sender is requested to note that the acceptance of transactions through email is a facility provided by the AMC for the convenience of the sender and will be provided on a best effort basis. The AMC shall not be held liable for any loss suffered by the sender for processing of email transaction and/or for the acts done in good faith.

● **Restriction on acceptance of third party payment for subscription of units under the schemes of Abakkus Mutual Fund:**

Abakkus Investment Managers Private Limited (AMC)/Abakkus Mutual Fund shall not accept applications for subscriptions of units accompanied with third party payment. "Third party payment" means payment made through an instrument issued from a bank account other than that of the first named applicant/investor mentioned in the application form.

As referred to in the paragraph above, following are exceptional cases where third party payments will be accepted subject to requisite documentation/declarations.

- Payment by parents / legal guardian of the minor/ from joint account of the minor with parent or legal guardian on behalf of minor in consideration of natural love and affection or as gift for a value not exceeding Rs. 50,000. However, the donors will have to comply with the requirements stated herein below.
- Payment by employer on behalf of employee under systematic investment plan (SIP) facility through pay roll deductions.
- Custodian on behalf of an FII or a client.

Investors submitting their applications through the above-mentioned exceptional cases are required to comply with the following, without which applications for subscriptions for units will be rejected /not processed /refunded.

- a. Mandatory KYC for all the investors (guardian in case of minor) and the person making the payment i.e. third party. In order for an application to be considered as valid, investors and the person making the payment should attach their valid KYC acknowledgment letter to the application form.
- b. Submission of a separate, complete and valid "third party declaration form" from the investors (guardian in case of minor) and the person making payment i.e. the third party. The said declaration form shall, inter-alia contain the details of the bank account from which the payment is made and the relationship with the investor(s).

The Forms shall be available and accepted at the office of Investor Service Center, Official Point of Acceptance of Transaction, Distributors, at the registered and corporate office of the AMC and the office of the Registrar during the business hours. The same can also be downloaded from the website of Abakkus Mutual Fund <https://www.abakkusmf.com> and from website of Registrar <https://www.kfintech.com/> ;and from the website of MFCentral: <https://mfcentral.com/>

● **How to Redeem**

A Transaction Slip can be used by the Unit Holder to request for Redemption. The requisite details should be entered in the Transaction Slip and submitted at an ISC/Official Point of Acceptance. Transaction Slips can be obtained from any of the ISCs/Official Points of Acceptance.

● **Procedure for payment of redemption:**

**1. Resident Investors**

Redemption proceeds will be paid to the investor through Real Time Gross Settlement (RTGS), NEFT, Direct Credit, Cheque or Demand Draft.

- a) If investor has provided IFSC code in the application form, by default redemption proceeds shall be to be credited to Investor's account through RTGS/NEFT.

- b) If Investor has neither provided IFSC code nor the NEFT code but have a bank account with Banks with whom the Fund has an arrangement for Direct Credit from time to time, the proceeds will be paid through direct credit.
- c) In case if investor bank account does not fall in the above a to b categories, redemption proceeds will be paid by cheques/ demand drafts, marked "Account Payee only" and drawn in the name of the sole holder/first-named holder (as determined by the records of the Registrar).
- d) The bank name and bank account number, as specified in the Registrar's records, will be mentioned in the cheque/demand draft. The cheque will be payable at par at all bank branch or specific cities. If the Unit Holder resides in any other city, he will be paid by a demand draft payable at the city of his residence and the demand draft charges shall be borne by the AMC (please refer SAI for details).
- e) The redemption proceeds will be sent by courier or (if the addressee city is not serviced by the courier) by registered post/UCP. The dispatch for the purpose of delivery through the courier/postal department, as the case may be, shall be treated as delivery to the investor. The AMC/Registrar are not responsible for any delayed delivery or non-delivery or any consequences thereof, if the dispatch has been made correctly as stated in this paragraph.
- f) The AMC reserves the right to change the sequence of payment from (a) to (c) without any prior notice.

For Unit holders who have given specific request for Cheque/Demand Draft Redemption proceeds will be paid by cheque/demand drafts and payments will be made in favour of the Unit holder with bank account number furnished to the Mutual Fund.

(Please note that it is mandatory for the Unit holders to provide the Bank account details as per the directives of SEBI). Redemption cheques will be sent to the Unit holder's address.

The Mutual Fund will endeavor to dispatch the redemption proceeds within 1 Business Day from the date of Redemption. If the payment is not made within the period stipulated in the Regulations, the Unit Holder shall be paid interest @15% p.a. or as specified by SEBI for the delayed period and the interest shall be borne by the AMC.

The Trustee, at its discretion at a later date, may choose to alter or add other modes of payment.

## **2. Non-Resident Investors**

For NRIs, Redemption proceeds will be remitted depending upon the source of investment as follows:

### **i. Repatriation basis**

When Units have been purchased through remittance in foreign exchange from abroad or by cheque / draft issued from proceeds of the Unit Holder's FCNR deposit or from funds held in the Unit Holder's Non Resident (External) account kept in India, the proceeds can also be sent to his Indian address for crediting to his NRE/FCNR/non-resident (Ordinary) account, if desired by the Unit Holder.

### **ii. Non-Repatriation basis**

When Units have been purchased from funds held in the Unit Holder's non-resident (Ordinary) account, the proceeds will be sent to the Unit Holder's Indian address for crediting to the Unit Holder's non-resident (Ordinary) account.

For FIIs, the designated branch of the authorized dealer may allow remittance of net sale/maturity proceeds (after payment of taxes) or credit the amount to the Foreign Currency account or Non-resident Rupee account of the FII maintained in accordance with the approval granted to it by the RBI.

The Fund will not be liable for any delays or for any loss on account of any exchange fluctuations, while converting the rupee amount in foreign exchange in the case of transactions with NRIs/FIIs. The Fund may make other arrangements for effecting payment of redemption proceeds in future.

## **Effect of Redemptions**



The number of Units held by the Unit Holder in his/her/its folio will stand reduced by the number of Units Redeemed. Units once redeemed will be extinguished and will not be re-issued.

The normal processing time may not be applicable in situations where such details are not provided by investors/Unit holders. The AMC will not be responsible for any loss arising out of fraudulent encashment of cheques and/or any delay/loss in transit.

#### **Unclaimed Redemptions**

As per paragraph 14.3 of SEBI Master Circular on Mutual Fund dated June 27, 2024, the unclaimed Redemption amounts shall be deployed by the Fund in money market instruments only. The unclaimed Redemption and amounts shall be deployed in money market instruments and such other instruments/securities as maybe permitted from time to time. The investment management fee charged by the AMC for managing such unclaimed amounts shall not exceed 50 basis points. The circular also specifies that investors who claim these amounts during a period of three years from the due date shall be paid at the prevailing NAV. Thus, after a period of three years, this amount can be transferred to a pool account and the investors can claim the said amounts at the NAV prevailing at the end of the third year. In terms of the circular, the onus is on the AMC to make a continuous effort to remind investors through letters to take their unclaimed amounts. The details of such unclaimed amounts shall be disclosed in the annual report sent to the Unit Holders.

As per SEBI Circular Reference No. SEBI/HO/IMD/IMD-SEC-2/P/OW/2025/02346/1 dated January 22, 2025:

- The AMC shall transfer the unclaimed redemption and dividend amounts to UDRS after 90 days.
- Further the AMC shall maintain separate scheme/plan:

#### **Unclaimed Redemption and Dividend Scheme (Under Liquid Fund) i.e. 4 plans:**

- Unclaimed IDCW less than 3 years
- Unclaimed IDCW more than 3 years
- Unclaimed redemption amount less than 3 years
- Unclaimed redemption amount more than 3 years
- AMC shall transfer such units to the UDRS (>3) plan within 10 business days of the subsequent month after completing the 3-year period.
- The income accrued on unclaimed amounts beyond 3 years shall be transferred monthly (on or before the 10th calendar day of the subsequent month) to the investor education scheme or folio.

AMC reserves the right to provide the facility of redeeming Units of the Scheme through an alternative mechanism including but not limited to online transactions on the Internet, as may be decided by the AMC from time to time. The alternative mechanism may also include electronic means of communication such as redeeming Units online through the AMC Website or any other website, etc. The alternative mechanisms would be applicable to only those investors who opt for the same in writing and/or subject to investor fulfilling such conditions as AMC may specify from time to time.

The list of names and address of unitholders in whose folios there are unclaimed amounts are made available on our website <https://www.abakkusmf.com>. The details may be obtained by unitholders by providing proper credentials (like PAN, date of birth etc.). The information on unclaimed amount and its prevailing value will be separately disclosed in statement of accounts/ Consolidated Accounts Statement. Detailed process of claiming the unclaimed amount and the necessary forms/documents has also been made available on our website <https://www.abakkusmf.com>.

Applicants/unitholders may contact our Investor Service Centers/their distributors, for any additional information/clarifications.

**Important Note:** All applicants for Purchase of Units/Redemption of Units must provide a bank name, bank account number, branch address, and account type in the Application Form.

AMFI Best Practice Guidelines Circular No.118 /2024-25) on Acceptance of financial transactions through email in respect of non-individual investor.

Non-individual Investors are requested to note the following:

- **Risks Involved in Transacting via Email:**

The Non-individual investor acknowledges and accepts the inherent risks associated with conducting financial transactions via email. These risks include, but are not limited to, the possibility of unauthorized access to email communications, transmission delays, data loss, or alteration due to technical glitches or cyberattacks, which could impact the completeness or accuracy of the transaction. Additionally, emails may be susceptible to interception, unauthorized access, and other security vulnerabilities, which could lead to fraudulent transactions. Therefore, investors must be cautious while initiating financial transactions via email and should ensure the confidentiality and integrity of their communication.

- **Limitation of Liability of AMC/RTA:**

The Asset Management Company (AMC) and the Registrar and Transfer Agent (RTA) shall not be held liable for any loss or damage caused by the non-receipt or delay in receiving any transaction sent by the investor via email. This includes situations where emails are not delivered, are delayed, or are intercepted due to issues beyond the control of the AMC or RTA, including but not limited to, technical failures, service provider errors, or unauthorized access to the email account. The AMC and RTA will not be responsible for any transactions that are erroneously processed or not processed due to such issues. The liability of the AMC and RTA is limited solely to the extent of ensuring that the transaction is processed once received in the proper format and within a reasonable timeframe, subject to system availability and security checks.

- **Security Measures to Ensure Safe Email Communication:**

The AMC and RTA are committed to ensuring the highest level of security for email communications and shall implement appropriate safeguards. These measures include the use of encrypted email services, secure authentication protocols, and virus/malware scanning for all incoming and outgoing emails. Additionally, access to email accounts and transaction systems shall be restricted to authorized personnel only, and multi-factor authentication will be employed to verify the identity of the individuals initiating transactions. The AMC shall take all reasonable steps to prevent unauthorized access, disclosure, or alteration of the financial data transmitted via email.

- **Retention of Transaction Records:**

The AMC and RTA will retain records of all transactions routed via email in accordance with applicable laws and regulations. These records will include, but are not limited to, transaction requests, email correspondence, and confirmation receipts, for a minimum period as mandated by regulatory authorities. The Non-Individual investor agrees that these records shall be stored in a secure digital format to ensure their integrity and availability for future reference. In addition, the AMC shall maintain an audit trail for each transaction, allowing for the traceability of emails and the status of each request submitted via email.

- **Procedure for Addition/Deletion of Authorized Signatories:**

The facility to transact via email shall follow an appropriate procedure for the addition or deletion of authorized signatories. Such changes must be communicated to the AMC through a formal notification, in the form of a signed letter or email from the authorized representative of the entity, accompanied by the requisite board resolution or authority letter. The AMC shall process these changes only upon receipt of valid documentation confirming the updated list of authorized signatories. These changes will only be effective once the AMC has acknowledged receipt and validation of the notification.

- **Authorization for Non-Individual Investors:**

For non-individual investors, including registered mutual fund distributors or third parties authorized by the investor, to submit financial transactions via email on behalf of the entity, the AMC and RTA require prior written authorization from the investor. This authorization should clearly state the scope of authority granted to the third party and must be submitted with each transaction request. The AMC will accept such transactions only if the relevant authorization documents are in place and the email corresponds with the pre-registered contact information for the entity or authorized third party.

- **Security Procedures for Transaction Confirmation:**

To confirm and authenticate email-based financial transactions, the AMC will employ a range of security procedures, including digital signatures, encrypted communication, and multi-step verification processes. These procedures are designed to verify that the transaction is genuinely authorized by the investor and ensure that the instructions have not been tampered with. Upon receipt of an email transaction, the AMC will conduct thorough checks to confirm the authenticity of the request, including comparing it against the pre-registered information (email addresses, signatories, etc.). Only upon successful verification will the transaction be processed.

- **Electronic Time Stamping and Audit Trail for Email Transactions:**

Each transaction processed via email shall be subject to an electronic time-stamping mechanism that records the exact time and date of receipt. This time stamp will serve as a reference point for any future inquiries or disputes regarding the transaction. Furthermore, AMC shall maintain an audit trail, tracking all actions related to the email transaction, including receipt, verification, and processing. The audit trail will provide transparency, ensure accountability, and facilitate the resolution of any issues related to email-based transactions.

- **Change in Registered Email Address/Contact Details:**

Any change in the registered email address or contact details of the entity must be communicated to the AMC via a physical letter, including a scanned copy, signed by the designated authorized officials of the entity. This change request must also be supported by a copy of the relevant board resolutions or authority letter from the entity, issued on the official letterhead. The AMC will not accept email requests for such changes. Further, changes in the registered email address will not be processed unless the request complies with these requirements. This ensures that only authorized personnel can modify the contact details associated with the Non-individual investor's account.

- **Changes in Bank Mandate:**

No changes to the bank mandate (including adding or modifying bank account details) will be accepted via email. Such changes must be submitted using the prescribed service request form, duly signed by the entity's authorized signatories. The form must also be accompanied by the wet signatures of the designated officials of the entity. This ensures the authenticity and validity of any change in the bank details associated with the Non-individual Investor's account, and that no unauthorized modifications are made via email.

- **Digital Signatures and Validity of Electronically Executed Documents:**

In case of any document executed electronically, the AMC recognizes the validity of Digital Signature Certificates (DSCs) or Aadhaar-based e-signatures provided by the authorized officials of the entity. These digitally signed documents will be treated as legally binding and valid, even if they are not sent from the registered email address of the authorized officials. However, the email domain from which the document is sent must match the official domain name of the entity. Such documents, when executed with a valid DSC or e-signature, will be processed by the AMC without requiring further verification through physical signatures.

#### **MITRA (Mutual Fund Investment Tracing and Retrieval Assistant)**

It is a Service platform for investors to trace inactive and unclaimed Mutual Fund folios- MITRA. The objective of MITRA platform is to encourage the investors to search for forgotten MF investments and update KYC as per the current norms. Investors can know the details of your inactive folio(s) where no transaction/s (financial and non-financial) have taken place in the last 10 years but unit balance is available.

Investors can view the details of any Inactive and Unclaimed Mutual Fund Folios by visiting MITRA PORTAL.

**Investments on Behalf of Minor** In addition to the existing procedures, the following procedures shall apply to the investments made on behalf of Minors:-

- Payment for investment by means of Cheque, Demand Draft or any other 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 only, else the transaction is liable to get rejected. However, 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.
- For systematic transactions in a minor's folio, AMC would register standing instructions till the date of the minor attaining majority, though the instructions may be for a period beyond that date. Upon the minor attaining the status of

major, the minor in whose name the investment was made, shall be required to provide all the KYC details, updated bank account details including cancelled original cheque leaf of the new account. No further transactions shall be allowed till the status of the minor is changed to major.

**Change of Status from Minor to Major:** Prior to the minor unit holder attaining the age of majority, the AMC/ Mutual Fund will send a notice to the minor unit holder at the registered correspondence address /email id advising such minor unit holder to submit, on attaining the age of majority, an application form along with prescribed documents to change the status of the folio/s from 'minor' to 'major'. Upon attainment of majority by the minor unit holder, the folio/s should be regularized forthwith.

The AMC may specify such procedures for regularisation of the Folio/s, as it may deem appropriate from time to time. Till the receipt of such intimation/information from the minor turned major Unit holder, existing contract as signed by the parent/legal guardian of the minor Unit holder will continue. However, from the date of attainment of majority, Folio/s of the minor unit holder will be frozen for operation by the representing guardian, and all transactions will be suspended.

No transactions will be permitted in the Folio(s) till the regularization of the Folio/s in a manner prescribed by the AMC/Mutual Fund. The AMC/ Mutual Fund will register standing instructions like SIP/STP etc. for a folio held by a minor unit holder from the parent/legal guardian only till the date when the minor unit holder attains the age of majority, even though the instructions may be for a period beyond that date. Change of Guardian: In case of change of natural parent/legal guardian of a minor unit holder, the new parent/legal guardian must submit the documents prescribed by the AMC/Mutual Fund, including the following: a) No Objection Certificate (NoC) or Consent Letter from existing parent or Court Order appointing new legal guardian for the benefit of the minor Unit holder. b) KYC Acknowledgment Letter of new parent/legal guardian.

**Cash Investments:** The AMC would not accept cash for investment in the scheme.

#### **A. Special Products/Facilities offered by the AMC/Schemes**

##### **1. Systematic Investment Plan (SIP)**

SIP is a facility enabling investors to save and invest in the Scheme at frequency/dates prescribed by the Mutual Fund, by submitting post-dated cheques payment instructions.

Particulars	Frequency	Details
Frequency and Transaction Dates	Weekly	Every Wednesday
	Fortnightly	Alternate Wednesday
	Monthly	All Business Days
	Quarterly	All Business Days
	Half Yearly	All Business Days
Minimum value of SIP	Rs. 500 and in multiples of Re. 1/- thereafter with a minimum of 6 instalments.	

Unit holders can enroll for SIP facility by submitting duly completed Enrolment Form at the Official Point(s) of Acceptance.

If the SIP period is not specified by the unit holder then the SIP enrolment will be deemed to be for perpetuity and processed accordingly.

Default option:

Default date – 07<sup>th</sup> of every month/quarter/half yearly

Default frequency – Monthly

Any SIP debit occurs after receipt of SIP Cancellation where debit feed is already triggered shall be refunded.

**SIP TOP UP Facility:**

- a. Investors can opt for SIP TOP UP facility with Fixed Top Up option or Variable Top Up option wherein the amount of the SIP could be increased at fixed intervals. In case the investor opts for both options, the Variable Top Up option would be triggered.
- b. The Fixed TOP UP amount shall be for minimum Rs. 500/- and in multiples of Rs. 1/- thereafter (for debt schemes) and minimum Rs. 500/- and in multiples of Rs. 1/- thereafter (for equity scheme).
- c. Variable TOP UP would be available in at 5%, 10% and 15% and such other denominations (over and above 5%, 10% and 15%) as opted by the investor in multiples of 5%. An investor can also TOP UP the SIP in amount terms by keeping minimum top up of Rs. 100/- and in multiples of Rs. 1/- thereafter (for debt schemes) and minimum Rs. 100/- and in multiples of Rs. 1/- thereafter (for equity scheme).
- d. The frequency is fixed at Yearly and Half Yearly basis. In case the TOP UP facility is not opted by ticking the appropriate box and frequency is not selected, the TOP UP facility may not be registered.
- e. In case of Quarterly SIP, only the Yearly frequency is available under SIP TOP UP.
- f. SIP Top-Up facility shall be available to all the investors.

**Top-Up Cap amount or Top-Up Cap month-year:** Top-Up Cap amount: Investor has an option to freeze the SIP Top-Up amount once it reaches a fixed predefined amount. The fixed pre-defined amount should be lower than or equal to the maximum amount mentioned by the investor in the bank mandate. In case of difference between the Cap amount and the maximum amount mentioned in the Bank mandate, then the amount which is lower of the two amounts shall be considered as the default amount of SIP Cap amount. Top-Up Cap month-year: It is the date from which SIP Top-Up amount would cease and last SIP instalment including Top-Up amount would remain constant from Cap date till the end of SIP tenure. Investor shall have flexibility to choose either Top-Up Cap amount or Top-Up Cap month- year. In case of multiple selection, Top-Up Cap amount would be considered as default selection. All the investors of the scheme subscribing the facility under SIP Variable Top - Up feature are hereby requested to select either Top - Up Cap amount or Top - Up Cap month - year. In case of no selection, the SIP Variable Top - Up amount would be capped at a default amount of Rs. 10 lakhs. Under the said facility, SIP amount would remain constant from Top - Up Cap date/ amount till the end of SIP Tenure. SIP Top-Up facility shall not be available in case of Micro-SIP.

**Micro Systematic Investment Plan (Micro SIP):** Micro SIP/PAN Exempt Investments In line with SEBI letter no. OW/16541/2012 dated July 24, 2012, addressed to AMFI, Investments in the mutual fund schemes including investments through Systematic Investment Plans (SIPs) up to Rs. 50,000/- per investor per year shall be exempted from the requirement of PAN. The investor will have the facility of investing by Micro SIP under the current SIP facility. The Minimum Investment amount per instalment would be as per applicable minimum investment amount of the scheme. The total investment under Micro SIP cannot exceed Rs. 50,000/-.

**SIP through Electronic Clearing System (ECS)/Direct Debit**

Investors/Unit holders may also enroll for SIP facility through Electronic Clearing Service (Debit Clearing) of the RBI or for SIP Direct Debit Facility available with specified Banks/Branches. In order to enroll for SIP ECS Debit facility or Direct Debit Facility, an Investor must fill-up the Application Form for SIP ECS/Direct Debit facility.

In case of SIP with payment mode as ECS/Direct Debit, Investors shall be required to submit a cancelled cheque or a photocopy of a cheque of the bank account for which the ECS/debit mandate is provided.

All SIP cheques/payment instructions from 2<sup>nd</sup> to the last should be of the same amount and same date (excluding first cheque).

However, there should be a gap of 30 days between first SIP Installment and the second installment in case of SIP started during ongoing offer.

Investors will have the right to discontinue/cancel the SIP facility at any time by sending a written request to any of the Official Point(s) of Acceptance. SIPs shall be cancelled within 10 calendar days of such request placed by the investor. On receipt of such request, the SIP facility will be terminated. It is clarified that if the Fund fails to get the proceeds from three Installments out of a continuous series of Installments submitted at the time of initiating a SIP (Subject to a minimum under SIP i.e. 12 months), the SIP is deemed as discontinued.

In case of auto cancellations, uniform timeline for treating a SIP as closed/cancelled shall be as specified by SEBI.

Number of failed debit attempts prior to cancellations of SIP for weekly, fortnightly and monthly shall be 3 attempts and in case of bi-monthly or higher interval/frequency shall be 2 attempts.

Units will be allotted at the Applicable NAV of the respective dates on which the investments are sought to be made. In case the date falls on a Holiday or falls during a Book Closure period, the immediate next Business Day will be considered for this purpose.

An extension of an existing SIP will be treated as a new SIP on the date of such application, and all the above conditions need to be met with.

The AMC reserves the right to change / modify Load structure and other terms and conditions under the SIP prospectively at a future date. Please refer to the SIP Enrolment Form for terms & conditions before enrolment.

**Mode of Payment for SIP:** In case of SIP with payment mode as Standing Instruction / NACH, Investors are required to submit a cancelled cheque or a photocopy of a cheque of the bank account, as applicable for which the debit mandate is provided. Investors are requested to note that holding of units through Demat Option is also available. The units would be allotted based on the applicable NAV and would be credited to investors' Demat account on T + 2 days basis upon realization of funds.

**SIP cancellation:** The AMC will endeavour to have the cancellation of registered SIP mandate within 5 working days from the date of receipt of the cancellation request from the investor. The existing instructions/mandate would continue till the date that when it is confirmed the SIP has been cancelled.

## 2. Systematic Transfer Plan (STP)

STP is a facility given to the Unit holders to transfer sums on periodic basis from one scheme to another schemes launched by the Mutual Fund from time to time by giving a single instruction.

Investors can opt for the Systematic Transfer Plan by investing a lump sum amount in one scheme of the fund and providing a standing instruction to transfer sums at regular intervals.

Particulars	Frequency	Details
Frequency and Transaction Dates	Daily	All Business Days
	Weekly	Every Wednesday
	Fortnightly	Every Alternate Wednesday
	Monthly	1,7,10,15,20, 25 day of Month
Minimum value of STP	Rs. 1000/- each and in multiples of Rs. 100/- thereafter with minimum 6 installments	

Default Option :

Default Date – 05th

Default Frequency – Monthly

If any STP transaction due date falls on a non-Business Day, then the respective transactions will be processed on the immediately succeeding Business Day for both the schemes.

STP can be into any other scheme (as may be permitted by the Scheme Information Document of the respective schemes) of Abakkus Mutual Fund. Investors could also opt for STP from an existing account by quoting their account / folio number.

## 3. Systematic Withdrawal Plan (SWP)



SWP is a facility enabling the unit holders to withdraw amount from the Scheme at a frequency prescribed by the Mutual Fund from time to time, by giving a single instruction to the Mutual Fund.

There are two options available under SWP viz. - Monthly option and Quarterly option, the details of which are given below:

Particulars	Monthly Option	Quarterly Option
Minimum Value of SWP	Rs. 1000/- or 100 units with minimum 6 installments	Rs. 1000/- or 100 units with minimum 2 installments
Additional amount	In multiples of Rs. 100/- or 10 units	In multiples of Rs. 100/- or 10 units
Date of SWP Request	5 <sup>th</sup> of the month	5 <sup>th</sup> of April, July, October, January

Default Option: 05<sup>th</sup>

Default Frequency: Monthly

#### **4. Switching Options**

Investors who hold units in any of the schemes of Abakkus Mutual Fund may switch all or part of their holdings to the Scheme during the New Fund Offer Period subject to the provisions in the scheme information document of the respective scheme. Switch-in requests are subject to the minimum application amount as mentioned in the respective Scheme Information Document.

For switch-in requests received from the open-ended scheme during the New Fund Offer Period (NFO) under the Scheme, the switch-out requests from such Scheme will be effected based on the applicable NAV of such Scheme, as on the day of receipt of the switch request, subject to applicable cut-off timing provisions. However, the switch-in requests under the Scheme will be processed on the date of the allotment of the Units.

#### **5. SIP Pause Facility:**

SIP Pause facility gives option to pause the SIP for a period ranging from 1 month up to 3 months in a respective scheme. Basic Terms and conditions are as follows:

- The applicant will have the right to pause SIP which is directly registered with Abakkus Mutual Fund.
- An investor who wishes to request for SIP Pause facility shall duly fill the SIP Pause Form and submit the same at the office of Abakkus Mutual Fund or KFin Service Center or online/app of Abakkus Mutual Fund.
- A valid form for SIP Pause facility will be processed within 15 days from the date of receipt of the same.
- SIP Pause facility would allow existing investor to 'Pause' their SIP for a specified period of time i.e. Minimum 1 month and Maximum 3 months.
- There would be no restriction on the number of times a SIP can be paused.
- SIP Pause facility shall be available where 'SIP Facility' is available in the Schemes of Abakkus Mutual Fund. SIP Pause Facility is applicable only for AMC initiated debit instructions i.e. ECS/NACH/Direct Debit, etc.
- SIP Pause Facility is not possible for investors having Standing Instructions with banks.
- The SIP shall continue from the subsequent instalment after the completion of pause period automatically.
- If the SIP pause period is coinciding with the SIP Top Up facility, the SIP instalment amount post completion of pause period would be inclusive of SIP Top Up amount. For e.g. SIP instalment amount prior to pause period is Rs. 500/- and SIP Top Up amount is Rs. 100/- . If the pause period is completed after date of SIP Top Up, then the SIP instalment amount post completion of pause period shall be Rs. 600/-
- Incomplete SIP Pause Form in any respect would be liable to be rejected.
- The investor hereby agrees to indemnify and not hold responsible, the AMC and its employees, the R&T agent and the service providers in case his/her bank is not able to effect any of the payment instructions for whatsoever reason.

#### **6. Transfer of Income Distribution cum capital withdrawal plan (IDCW Transfer Facility):**

IDCW transfer facility has been introduced in all our schemes. If an investor wants to opt for IDCW transfer facility, he can do so by filing of the transaction slip available at the ISCs. There is no assurance or guarantee to the unitholders as to rate of income distribution and regularity in declaration of income distribution. Rs. 500/- will be the minimum amount.

The request for enrolment for IDCW Transfer Plan must be submitted at least 7 (seven) business days prior to the Record Date for the dividend. In case of the condition not being met, the enrolment would be considered valid from the immediately succeeding Record Date of the dividend, the difference between the date of receipt of a valid application for enrolment under IDCW Transfer Plan and the next Record Date for dividend is not less than 7 (seven) business days.

The Trustee reserves the right to declare Income Distribution cum capital withdrawal under the Income Distribution cum capital withdrawal option of the Scheme depending on the net distributable surplus available under the Scheme. It should, however, be noted that actual distribution of Income Distribution cum capital withdrawal and the frequency of distribution will depend, inter-alia, on the availability of distributable surplus and will be entirely at the discretion of the Trustee.

The Income Distribution cum capital withdrawal will be distributed in accordance with applicable SEBI Regulations and SEBI Circular no. SEBI/ IMD/ Cir No. 1/ 64057/06 dated April 4, 2006 on the procedure for Income Distribution cum capital withdrawal Distribution.

IDCW transfer facility will be registered in a folio held by a minor only till the date of the minor attaining majority, even though the instructions may be for a period beyond that date. The facility will automatically stand terminated upon the Unit Holder attaining 18 years of age.

#### **B. Default scenarios available to the investors under plans/options of the Schemes**

The following criteria will be considered for Uniform disclosure on treatment of applications under Direct/Regular plans:

Scenario	Broker Code mentioned by the investor	Plan mentioned by the investor	Default Plan to be captured
1.	Not mentioned	Not mentioned	Direct Plan
2.	Not mentioned	Direct	Direct Plan
3.	Not mentioned	Regular	Direct Plan
4.	Mentioned	Direct	Direct Plan
5.	Direct	Not Mentioned	Direct Plan
6.	Direct	Regular	Direct Plan
7.	Mentioned	Regular	Regular Plan
8.	Mentioned	Not Mentioned	Regular Plan

In cases of wrong/invalid/incomplete ARN codes mentioned on the application form, the application shall be processed under Regular Plan. The AMC shall contact and obtain the correct ARN code within 30 calendar days of the receipt of the application form from the investor/distributor. In case, the correct code is not received within 30 calendar days, the AMC shall reprocess the transaction under Direct Plan from the date of application without any exit load, if applicable

Default Option: Growth

All plans and options available for offer under the Scheme shall have a common portfolio but separate NAVs, as applicable, shall be applied among Plans and Options.

#### **Online transactions through KFIN Online website for KFIN**

- Registrar and Transfer Agent ("RTA") for Abakkus Mutual Fund has built an online website <https://mfs.kfintech.com> wherein investors/unit holders can transact in the schemes of Abakkus Mutual Fund by opening an account on RTA Website/portal/mobile app ("Online Facility"). The transactions in the scheme of Abakkus Mutual Fund through this online facility be allowed as may be facilitated by RTA on its website. RTA online Website/portal/mobile app/server be considered as OPAT. Investors/unitholders please note that only KYC complied investor/unitholders or KYC process to be completed before transaction submission allowed to use this online facility/portal/mobile app. For the purpose of



determining the applicability of NAV, time of transaction would be the time when request for subscription/sale/switch of units is received in the servers of AMC/ RTA.

- **Introduction of Choti SIP Facility**

The Fund has introduced Choti SIP facility which helps to promote financial inclusion, inculcate the habit of systematic saving and facilitate investment of small savings by investors new to the Mutual fund industry, by sachetisation of Mutual Funds.

1. Investors can avail Choti SIP by investing via Systematic Investment Plan ("SIP") in the schemes of the Fund with Rs. 250.
2. The Minimum number of installments for availing Choti SIP shall be 60 instalments, however, early withdrawal of the instalments shall not be restricted.
3. The Choti SIP will be available only to first-time individual investors in the industry and will be restricted to three SIPs (one in each of upto 3 Asset Management Companies). Any Investor having investments in schemes of any Mutual Fund or any SIP other than Choti SIP or a lumpsum investment across any Mutual Fund, in that case, the said investor shall be considered ineligible under Choti SIP.
4. The Choti SIP will be available under Growth option for all schemes of Abakkus Mutual Fund (except for Debt, Sectoral & Thematic Schemes, Mid cap and Small cap Schemes) with only monthly frequency.
5. The mode of payment/investment for Choti SIP shall be restricted to NACH and UPI auto pay only. No transaction charges will be deducted for Choti SIP.
6. All statutory disclosures to unitholders of Choti SIPs shall be through a valid and registered mobile number. The same can also be made over email ID, if provided.

The AMC reserves the right to modify list of Eligible Schemes from time to time. All other terms and conditions of the aforesaid Eligible Schemes shall remain unchanged. It may be noted that the features of the facility are subject to guidelines and terms and conditions as notified by SEBI/AMFI from time to time.

## **VII. Rights of Unitholders of the Scheme**

1. Unit holders of the Scheme have a proportionate right in the beneficial ownership of the assets of the Scheme.
2. When the Mutual Fund declares an Income Distribution cum Capital Withdrawal (IDCW)/dividend under a scheme, IDCW warrants shall be dispatched to the Unit Holders within 7 Working days from the record date for declaration of the IDCW. and dispatch of redemption or repurchase proceeds shall be made within 3 working days from the date of redemption or repurchase.
3. A consolidated Account Statement and Monthly CAS shall be issued to investors that have opted for delivery via electronic mode (e-CAS) by the twelfth (12th) day from the month end, detailing all the transactions across all schemes of Abakkus Mutual Fund and to investors that have opted for delivery via physical mode by the fifteenth (15th) day from the month end.  
 In case of a specific request received from the unit holders, the AMC shall provide the account statement to the unit holder within 5 business days from the receipt of such request. If a Unit holder so desires the Mutual Fund shall issue a Unit certificate (non- transferable) within 5 Business Days of the receipt of request for the certificate.

If there is any transaction in any of the demat accounts of the investor or in any of his mutual fund folios, then CAS shall be sent to that investor through email on monthly basis. In case there is no transaction in any of the mutual fund and demat accounts then CAS with holding details shall be sent to the investors by email on half yearly basis.

The depositories shall dispatch the CAS to investors that have opted for delivery via electronic mode, on or before the eighteenth (18th) day of April and October and to investors that have opted for delivery via physical mode, on or before the twenty-first (21st) day of April and October.

4. The Mutual Fund shall dispatch redemption or repurchase proceeds within 3 working days of accepting the valid redemption or repurchase request. For schemes investing at least 80% of total assets in such permissible overseas investments, 5 Working Days of accepting the valid redemption or repurchase request. Further, in case of exceptional scenarios as prescribed by AMFI vide its communication no. AMFI/ 35P/ MEM-COR/ 74 / 2022-23 dated January 16, 2023, read with clause 14.1.3 of SEBI Master Circular No. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2023/74 dated June 27, 2024 (SEBI Master Circular), the AMC may not be able to adhere with the timelines prescribed above.
5. The Trustee is bound to make such disclosures to the Unit holders as are essential in order to keep the unitholders informed about any information known to the Trustee which may have a material adverse bearing on their investments.
6. The appointment of the AMC for the Mutual Fund can be terminated by majority of the Directors of the Trustee Board or by 75% of the Unit holders of the Scheme.
7. 75% of the Unit holders of a Scheme can pass a resolution to wind- up a Scheme.
8. The Trustee shall obtain the consent of the Unit holders:
  - whenever required to do so by SEBI, in the interest of the Unit holders.
  - whenever required to do so if a requisition is made by three- fourths of the Unit holders of the Scheme.
  - when the majority of the trustees decide to wind up a scheme in terms of clause (a) of sub regulation (2) of regulation 39 of SEBI (Mutual Funds) Regulations, 1996 or prematurely redeem the units of a close ended scheme.
9. The trustees shall ensure that no change in the fundamental attributes of any scheme, the fees and expenses payable or any other change which would modify the scheme and affect the interest of the unit holders is carried out by the asset management company, unless it complies with sub-regulation (26) of regulation 25 of SEBI (Mutual Funds) Regulations, 1996.
10. In specific circumstances, where the approval of unitholders is sought on any matter, the same shall be obtained by way of a postal ballot or such other means as may be approved by SEBI.

#### **UNCLAIMED REDEMPTION/IDCW AMOUNT**

The unclaimed Redemption amount and IDCW amounts that are allowed to be deployed only in call money market or money market instruments shall also be allowed to be invested in a separate plan of only Liquid schemes to deploy unclaimed Redemption and IDCW amounts. Investors who claim the unclaimed 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. The AMC will make a continuous effort to remind the investors through letters to withdraw their unclaimed amounts. The details of such unclaimed redemption/IDCW amounts are made available to investors upon them providing proper credentials, on website of Mutual Funds and AMFI along with the information on the process of claiming the unclaimed amount and the necessary forms/documents required for the same. Further, the information on unclaimed amount along-with its prevailing value (based on income earned on deployment of such unclaimed amount), will be separately disclosed to investors through the periodic statement of accounts/Consolidated Account Statement sent to the investors. Further, the investment management fee charged by the AMC for managing the said unclaimed amounts shall not exceed 50 basis points. AMC shall transfer unclaimed redemption and dividend amount to Unclaimed Dividend & Redemption within 15 days from the end of 90 days after the date of issuance of instruments. AMC shall maintain separate schemes/plans for amount pending for less than 3 years and more than 3 years. On completion of 3 years, AMCs shall transfer units from 3 year plan to more than 3 years plan within 10 business days of the subsequent month. Income accrued daily on unclaimed amounts beyond 3 years shall be transferred to investor education scheme on a monthly basis. Investors can trace their inactive and unclaimed Mutual Fund folios where no transaction/s (financial and non-financial) have taken place in the last 10 years but unit balance is available through MITRA (Mutual Fund Investment Tracing and Retrieval Assistant) service platform.

#### **VIII. INVESTMENT VALUATION NORMS FOR SECURITIES AND OTHER ASSETS**

SEBI vide gazette notification no. LAD-NRO/GN/2011- 12/38/4290, dated February 21, 2012 amended Regulation 25, 47 and the Eighth Schedule titled 'Investment Valuation Norms' under SEBI (Mutual Funds) Regulations, 1996 to introduce the overarching principles namely 'Principles of Fair Valuation'.

Based on the amendments by SEBI, Abakkus Investment Managers Private Limited has adopted a comprehensive policy on investment valuation and procedures. Accordingly, the disclosure inter-alia of the security/asset -wise valuation policy, procedure & methodology for each type of investment made by the scheme(s) of Abakkus Mutual Fund is given below:

The valuation of investments shall be based on the principles of fair valuation i.e. valuation shall be reflective of the realisable value of the securities/assets. The valuation shall be done in good faith and in true and fair manner through appropriate valuation policies and procedures.

The amendment also states that in case of any conflict between the principles of fair valuation and guidelines as per Eighth Schedule and circulars issued by SEBI, the Principles of Fair Valuation shall prevail.

AMFI had issued best practice guidelines circular No. 29/2012-13 dated May 15, 2012 on Valuation Principles for valuing Debt and Money Market Instruments.

In accordance with the SEBI vide its Master Circular no. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024, every AMC should have a valuation committee to review investment valuation practices.

Valuation committee of AMC consists of: -

**A. Composition**

- i. Chief Executive Officer,
- ii. Chief Operations Officer,
- iii. Chief Investment Officer/Head – Investments & Research and
- iv. Compliance Officer

**B. Chairperson**

The CEO shall serve as the Chairperson of the Valuation Committee and in the absence of CEO, the CIO/Head – Investments & Research shall chair the committee.

**C. Frequency of meetings**

This Committee on a regular basis review the systems and practices of valuation of securities.

**D. Quorum**

At least 2 members or 1/3rd of the total strength, whichever is higher.

**A. Equity and Related Instruments**

**1. Traded Securities-Equity and Equity Related Securities (Including Redeemable Preference shares and Cumulative Convertible Preference Share (CCPS), Partly Paid-up Equity Shares, Rights & Warrants)**

On the valuation day, at the last quoted closing price on the National Stock Exchange (NSE) or Bombay Stock Exchange, where such security is listed. NSE is the Principal Stock Exchange for the purpose of our valuation. If the stock is not traded/quoted on NSE, then the last quoted closing price of BSE or any other stock exchange will be considered.

When a security is not traded on any stock exchange on a particular valuation day, the value at which it was traded on NSE or BSE or any other stock exchange, as the case may be, on the earliest previous day may be used provided such date is not more than thirty days prior to the valuation date.

**2. Non-Traded Securities**

**(i) Securities not traded for more than 30 days:**

- a. Equity Shares – Valuation price will be in accordance with the SEBI norms i.e. valuation will be computed on the basis of average of book value [i.e. Net worth per share – (Share capital +reserves-revaluation reserve-Misc. Expenditures and Debit balance of P&L a/c) divided by No. of paid up shares] and the price computed on the basis of PE ratio (25% of the Industry PE Ratio based on NSE or BSE data) and further discount of 10% for illiquidity.

In case the EPS is negative, it shall be taken as zero for deriving the capitalized earning. In case where the latest balance sheet of the company is not available within nine months from the close of the year, unless the accounting year is changed, the shares of the company shall be valued at zero. Further, if such security accounts for more than 5% of the total assets of the scheme, an independent valuer shall be appointed by Board of Trustee for the valuation of the security. To determine the exposure of 5%, the security shall be valued as per the above procedure.

- b. Partly Paid Equity Shares shall be valued at underlying equity share price as reduced by the balance call money payable. Suitable illiquidity discount, if deemed necessary may be applied with approval from valuation committee.
- c. Preference Shares: Intrinsic Value will be considered subject to illiquidity discount;

**(ii) Equity Warrants/Rights Entitlement/Partly paid-up rights shares:**

**1. For Equity Warrants/Partly Paid-up rights shares:**

Valuation price will be arrived, after applying appropriate discount (valuation committee delegated power to decide the discounting factor) after reducing the exercise price/issuance price from the closing of the underlying cash equity security.

**2. Rights Entitlement:**

Until they are traded, the value of the rights entitlement shall be calculated as

$$V_r = n/m * (P_{ex} - P_{of})$$

Where

$V_r$  = Value of Rights;

$n$  = no. of rights;

$m$  = no. of original shares held;

$P_{ex}$  = Ex-rights price;

$P_{of}$  = Rights Offer Price.

In case the Rights Offer Price is greater than the ex-rights price, the value of the rights entitlement shall be taken as zero.

The Rights entitlement shall be valued at closing price of in accordance with point 1 if listed.

**3. Warrants:**

In respect of warrants to subscribe for shares attached to instruments, the warrants will be valued at the value of the share which would be obtained on exercise of the warrant as reduced by the amount which would be payable on exercise of the warrant. The value of warrant = (Value of underlying shares-exercise price). Appropriate illiquidity discount will be applied to account for the period which must elapse before the warrant can be exercised. If the amount payable on exercise is higher than the value of the share, the value of the warrant should be taken as zero.

**4. Partly Paid-up Share:**

If the partly paid-up share is not traded on any stock exchange on the date of valuation, then it should be valued at the price derived after reducing the uncalled amount from the Closing price of underlying fully paid-up share. Further Valuation Committee to decide on application of illiquidity discount as deemed appropriate on case-to-case basis.

**(iii) Demerger:**

Where at least one resultant company is not immediately listed, valuation price will be worked out by using cum-price before demerger reduced for quoted price of the listed demerged and/or resultant company(ies) or in case of demerger pending listing, the resultant company/ies shall be valued at the intrinsic value arrived at on the date of corporate action. Alternatively, an independent valuation of the security by any Market Participant, (a reputed brokers) shall be obtained.

In case there are two or more unlisted entities resulting due to demerger, then the market value of shares of unlisted entity arrived as above will be allocated to the resulting entities in the ratio of cost of shares till they are listed and traded on a stock exchange. The cost price of new entity/entities would be derived proportionately from the cost price of parent entity.

If a company provides any method/ratio for cost allocation as part of a scheme of arrangement, the same will be considered.

If the resultant companies remained unlisted for more than 3 months, the Valuation Committee to decide on application of illiquidity discount as deemed appropriate, on case-to-case basis."

**(iv) Merger:**

"Valuation of a resulting company would be determined by valuation of merging or amalgamating company immediately prior to the ex-date of merger or amalgamation.

- (a) In case, merging or amalgamating companies being listed, the valuation of resulting companies would be summation of valuation of entities immediately prior to merger date; further if listed company merges into an unlisted surviving company, then the surviving company would be valued at the traded value of merging company immediately before merger; For example: 1. If company A and B merged to form a new company C, then company C would be value at the price equals to A+B; 2. If company A which is a listed company merges into Company B which is unlisted, would be valued at traded price of A immediately before merger; (b) In case one of the merging or amalgamating companies being unlisted, valuation of resulting companies would be valued on the principles of fair valuation as guided by the valuation committee. If the above companies are unlisted for more than 3 months, valuation committee shall decide on application of illiquidity discount on case-to-case basis."

**3. Thinly Traded Securities**

When trading in an equity/equity related security in a calendar month is both less than INR 5 lacs and the total volume is less than 50,000 shares, it shall be considered as a thinly traded security. Policy similar to non-traded Equity Shares shall be applicable.

**4. Unlisted Securities (excluding instruments pending for listing)**

Unlisted equity shares of a company shall be valued "in good faith" on the basis of the valuation principles laid down below:

- a. Based on the latest available audited balance sheet, net worth shall be calculated as lower of (i) and (ii) below:
  - i. Net worth per share = [share capital plus free reserves (excluding revaluation reserves) minus Miscellaneous expenditure not written off or deferred revenue expenditure, intangible assets and accumulated losses] divided by Number of Paid-up Shares.
  - ii. After taking into account the outstanding warrants and options, Net worth per share shall again be calculated and shall be = [share capital plus consideration on exercise of Option/Warrants received/receivable by the Company plus free reserves(excluding revaluation reserves) minus Miscellaneous expenditure not written off or deferred revenue expenditure, intangible assets and accumulated losses] divided by {Number of Paid up Shares plus Number of Shares that would be obtained on conversion/exercise of Outstanding Warrants and Options}.

The lower of (i) and (ii) above shall be used for calculation of net worth per share and for further calculation in (c) below:

- b. Average capitalisation rate (P/E ratio) for the industry based upon either BSE or NSE data (which should be followed consistently and changes, if any, noted with proper justification thereof) shall be taken and discounted by 75% i.e. only 25% of the Industry average P/E shall be taken as capitalisation rate (P/E ratio). Earnings per share of the latest audited annual accounts will be considered for this purpose.
- c. The value as per the net worth value per share and the capital earning value calculated as above shall be averaged and further discounted by 15% for illiquidity so as to arrive at the fair value per share.

The above methodology for valuation shall be subject to the following conditions:

- i. All calculations as aforesaid shall be based on audited accounts.
- ii. In case where the latest balance sheet of the company is not available within nine months from the close of the year, unless the accounting year is changed, the shares of such companies shall be valued at zero.
- iii. If the net worth of the company is negative, the share would be marked down to zero.
- iv. In case the EPS is negative, EPS value for that year shall be taken as zero for arriving at capitalised earning.
- v. In case an individual security accounts for more than 5% of the total assets of the scheme, an independent valuer shall be appointed for the valuation of the said security. To determine if a security accounts for more than 5% of the total assets of the scheme, it should be valued in accordance with the procedure as mentioned above on the date of valuation.
- vi. At the discretion of the AMC and with the approval of the trustees, an unlisted equity share may be valued at a price lower than the value derived using the aforesaid methodology.

#### **5. Valuation of Illiquid Securities**

Aggregate value of "illiquid securities" under a scheme which are defined as non-traded, thinly traded and unlisted equity shares, shall not exceed 15% of the total assets of the scheme and any illiquid securities held above 15% of the total assets shall be assigned as zero value.

#### **6. Lock in Shares**

In case of Equity share under lock in for more than 3 months from the date of purchase/allotment, which are traded on the stock exchanges, the AMC may apply appropriate discount to the closing price quoted on the stock exchange as may be decided by the Valuation Committee on a case to case basis.

#### **7. Application Money for Primary Market Issue**

Application money for primary market issue should be valued at cost upto 30 days from the closure of the issue and/or allotment. If the security is not listed within 30 days from the date of closure or allotment, application money is to be valued as per the direction of valuation committee.

#### **8. Suspended Security**

In case trading in an equity security is suspended upto 30 days, then the last traded price would be considered for valuation of the security. If an equity security remains suspended for trading on the stock exchanges more than 30 days, then it would be valued as Non-traded security.

#### **9. Inter Scheme Transfer**

Inter-scheme would be done at the Price of the security prevailing on the NSE, primary stock exchange at the time of effecting the transfer. If not traded on the primary stock exchange, the closing price of other stock exchange (BSE) will be considered.

#### **10. Derivatives – Futures and Options (traded/non-traded)**

On the valuation day, at the settlement price provided by the respective Stock Exchanges.

#### **11. Qualified Institutional Placement (QIP) / Follow on Public Offer (FPO)/ Initial Public offer**

In case of QIP and FPO recognition and valuation would start from the date of allotment. In case of IPO the security would be valued at cost from the date of allotment till a day prior to listing and on last quoted closing price (as mentioned above under Traded criteria) from the day of listing.

#### **12. Convertible Debentures**

In respect of convertible debentures and bonds, the non-convertible and convertible components shall be valued separately. The non-convertible component (Debt) should be valued on the same basis as would be applicable to a debt instrument. The convertible component (Equity) should be valued on the same basis as would be applicable to an equity instrument/equity derivative. If, after conversion the resultant equity instrument would be traded pari passu with an existing equity instrument which is traded, the value of the latter instrument can be arrived at

after an appropriate discount for non-tradability, time value, volatility etc. of the equity instrument during the period preceding the conversion. While valuing such instruments, the fact whether the conversion is optional should also be factored in.

### **13. Compulsory Convertible Debentures (CCDs)**

Until listing, if prices are not available from AMFI approved valuation agencies, it will be valued at cost and appropriate illiquidity discount maybe provided.

On listing, valuation will be at the last quoted closing price on NSE.

Where the security is not traded on the NSE on a valuation date, the last quoted closing price on BSE may be used. If the security is not traded on both NSE and BSE on a valuation date and the prices are received from valuation agencies, the average prices provided by the agencies will be used.

In case the security is not traded for more than 30 days and prices of approved agencies are not available, CCDs will be valued at fair value as per procedures given below:

- (i) Each CCD shall be converted into such number of Equity shares based on the conversion price arrived in accordance with the offer documents.
- (ii) In case the CCD has two components viz., one component having bond carrying a coupon rate and second component having an embedded forward contract for compulsory conversion into equity, at a pre-determine formulae, linked to the underlying price of the stock on the exchange, the valuation derived would be a summation of the bond valuation and the Net Present Value (NPV) of the gain/loss on the embedded forward contract for conversion into equity shares.
- (iii) **Valuation of Bonds:** The same will be valued as per the framework for debt securities/instruments provided by AMFI until the prices are provided by the valuation agencies.
- (iv) **Valuation of Embedded forward contract for equity conversion:** The embedded forward contract has three elements – time value, price movement of the underlying stock and illiquidity risk. The time value (NPV) is the discounting factor, as derived from the bond valuations from valuation agencies.
- (v) In case the conversion is scheduled after completion of specified period/years as mentioned in the offer documents, the value arrived will be reduced by appropriate illiquidity discount on the gain, if any, as may be specified by SEBI under the applicable guidelines or as may be decided by valuation committee.

The valuation committee may exercise its discretion to value the security at a conservative value i.e. at cost or as per the above methodology whichever is lower to ensure fair valuation.

## **B. Fixed Income and related securities**

Security level prices provided by Valuation Agencies will be used for valuation of debt and money market instruments. AMFI has designated CRISIL Ltd ('CRISIL') and ICRA online Limited ('ICRA') as valuation agencies. The detailed guidelines for valuation of debt and money market instruments are as under:

### **1. Valuation of all Debt and Money Market Instruments excluding Overnight Repo**

Securities, [including Government Securities, Treasury Bills, Cash Management Bills, State Development bonds etc., Reverse Repo, Corporate Debt Repo, TREPS], shall be valued at average of the security level prices provided by valuation agencies. In case security level prices are not given by valuation agencies, then such securities will be valued at weighted average purchase yield on the date of allotment/purchase.

### **2. Valuation of Securities with Put/Call Options**

The options embedded securities would be valued as follows:

#### **(a) Securities with Call option**

The securities with call option shall be valued at the lower of the value as obtained by valuing the security to final maturity and valuing the security to call option. In case there are multiple call options, the lowest value obtained by valuing to the various call dates and valuing to the maturity is to be taken as the value of the instrument.

In case of AT1 Bonds, the 'yield to call' would only be considered as per SEBI circular dated August 5, 2024.



**(b) Securities with Put Option**

The securities with put option shall be valued at the higher of the value as obtained by valuing the security to final maturity and valuing the security to put option. In case there are multiple put options, the higher value obtained by valuing to the various put dates and valuing to the maturity is to be taken as the value of the instrument.

**(c) Securities with both put/call option**

The securities with both put and call option on the same day and having the same put and call price, shall be deemed to mature on that day and valued accordingly.

In all other cases, the cash flow of each put/call option shall be evaluated and the security shall be valued on the following basis:

- (1) Identify the 'put trigger date', a date on which 'price to put option' is the highest when compared with price to other put options and maturity price.
- (2) Identify a 'call trigger date', a date on which 'price to call option' is the lowest when compared with price to other call options and maturity date.
- (3) In case no Put Trigger Date or Call Trigger Date is available, then valuation would be done to maturity price. In case one Trigger is available, then valuation would be done as to the said trigger date. In case both trigger dates are available, then valuation would be done to the earliest date.

If the put option is not exercised, by a mutual fund when exercising such put option would have been in favour of the scheme, in such cases the justification for not exercising the put option shall be provided to the Board of AMC and Trustees.

In respect of valuation of securities with multiple put options present ab-initio wherein put option is factored into valuation of the security by the valuation agency, If the put option is not exercised by a Mutual Fund, while exercising the put option would have been in favour of the scheme:

1. A justification for not exercising the put option shall be provided by the Abakkus MF to the Valuation Agencies, Board of AMC and Trustees on or before the last date of the notice period.
2. The Valuation Agencies shall not take into account the remaining put options for the purpose of valuation of the security.

The put option shall be considered as 'in favour of the scheme' if the yield of the valuation price ignoring the put option under evaluation is more than the contractual yield/coupon rate by 30 basis points.

Note: It is clarified that the maturity of perpetual bonds (Other than bonds issued under Basel III framework) shall be treated as 100 years from the date of issuance of the bond for the purpose of valuation.

**3. Valuation of money market and debt securities classified as below investment grade or default**

All money market and debt securities which are rated below investment grade shall be valued at the average of the security level price provided by valuation agencies.

Till such time the valuation agencies compute the valuation of money market and debt securities classified as below investment grade, such securities shall be valued by the valuation agencies on the basis of indicative haircuts. These indicative haircuts shall be applied on the date of credit event i.e. migration of the security to sub-investment grade and shall continue till the valuation agencies compute the valuation price of such securities. The indicative hair cut shall also be applied to any accrued interest also. (the indicative haircut communicated by AMFI vide its communication dated April 30, 2019 is given as Note A below).

If security is traded, it will be valued at lower of weighted average traded price available on public platform or average of the security level price provided by valuation agencies.

In case of trades after the valuation price is computed by the Valuation Agencies as referred above and where the traded price is lower than such computed price, such traded price shall be considered for the purpose of valuation and the valuation price may be revised accordingly.

The trades referred above shall be of a minimum size as determined by valuation agencies.

In absence of the above information the valuation shall be arrived at basis guidance from Valuation Committee. In case of any deviation from the valuation price for money market and debt securities rated below investment grade provided by the valuation agencies, AMC shall follow the procedure as mentioned in SEBI Circular No SEBI/HO/IMD/DF4/CIR/P/2019/41 dated March 22, 2019 and SEBI Circular No SEBI/HO/IMD/DF4/CIR/P/2019/102 dated September 24, 2019.

#### Treatment of Future Recovery

Any recovery shall be adjusted against the accrued interest recognized in the NAV and any balance shall be adjusted against the value of principal recognized in the NAV. Any recovery in excess of the carried value (i.e. the value recognized in NAV) should then be applied first towards amount of interest written off and then towards amount of principal written off.

#### **4. Interest Rate Futures**

The exchange traded Interest Rate Futures would be valued based on the Daily settlement Price or any other derived price provided by the exchange

#### **5. Interest Rate Swaps and other Debt OTC Derivatives**

Valuation would be done at average of Price provided by valuation agencies. In absence of Price from valuation agencies, valuation shall be arrived at basis guidance from Valuation Committee.

#### **6. Market Linked Debentures**

Valuation would be done at average of Price provided by valuation agencies. In absence of Price from valuation agencies, valuation shall be arrived at basis guidance from Valuation Committee.

#### **7. Bank Fixed Deposits and Overnight Repos/TREPS**

Investment in short-term deposits with banks (pending deployment) and overnight repos/TREPS shall be valued on cost plus accrual basis.

#### **8. Partly Paid Debentures: As Per AMFI Best practice guidelines dated July 26, 2024 following are the guidelines on Investment in Partly Paid debentures**

1. Mutual Fund schemes shall make investment in partly paid debentures only when payment of the remaining amount is linked to clear, pre-defined events (i.e. is subject to conditions precedent). For avoidance of doubt any event which is purely time based shall not be considered as a pre-defined event. Such conditions precedent should be clearly outlined in the Agreement for subscription of the debentures/Offer Document for the issue, as the case may be. Conditions precedent mean the clearly defined obligations/events that need to be fulfilled before calling upon the investor to make payment for the remaining portion of the subscription. Such obligations/ events, to name a few, could include achievement of certain milestones linked with the object for which the debentures were issued or linked to the enhancement of credit rating of the Issuer or linked to other financial or operating parameters of the Issuer or linked to the happening of an event. AMCs shall not resort to the practice of investing in partly paid debentures without any condition precedent.
2. There should not be any linkages across schemes while investing in partly paid debentures. For example: if the agreement for partly paid debentures also envisages investment in any other type of instrument such as a commercial paper, then the AMC should ensure that subscription to the residual part of the issue/the

investment in the other instrument is made by the scheme which made the original investment in partly paid debentures.

3. While investing in partly paid debentures, AMCs shall ensure that interest of one set of unitholders/schemes is not compromised at the cost of another.
4. All regulatory limits have to be complied with at the time of each such part payment.
5. In order to avoid a situation where a MF scheme is unable to honour future part payments, AMCs should avoid excessive concentration in partly paid debentures.
6. Any investment in partly paid debentures has to be disclosed in the monthly portfolio disclosures of the scheme. This should include, inter-alia, the amount that has been contracted but not yet paid by the scheme, the dates of such future pay-ins, triggers for future pay-ins as well as any other detail that in the fund house's view may be of material interest to its investors.
7. Investment in Partly Paid Debenture is subject to a cap on maximum investment of Mutual Fund Scheme at 5% of the AUM of the scheme. However, once the Partly Paid Debentures are fully paid up, the cap on maximum investment of Mutual Fund Scheme at 5% of the AUM of the scheme will not apply.

## 9. Methodology for valuation of partly paid debentures

### (a) Price calculation:

Cash flows are plotted using the details provided in the term sheet. The same is then discounted using YTM derived for that particular ISIN. Prices are sent on face value of Rs 100 (when fully paid), and as per actual paid up value as per valuation date. Cash flows are plotted till actual maturity or deemed maturity (explicit put call option on same date and same value). Two types of securities are available:

- a. Pay-in dates and pay-in values are clearly defined – In such case future pay-ins are plotted as per details available in term sheet.
- b. Pay in dates and pay in values are not clearly defined or are linked to occurrence of some event or is optional linked to on demand from issuer/investor for making such pay-ins – In such case, since pay-in dates/pay-in values can't be estimated, such future pay-ins are factored on actual basis on receipt of information. (Mutual Funds cannot buy these PPDs as per the AMFI Best Practices Guidelines circular no. 83 dt. 18-Nov-2019 which is clarified in point no 1 as AMCs shall not resort to the practice of investing in partly paid debentures without any condition precedent.)

### (b) Yield Calculation:

Yields for the ISIN are derived on a daily basis using the standard waterfall approach prescribed for corporate bonds. Definitions of similar maturity, similar issuer, outlier security remains same as other normal securities.

## 10. AT-1 and Tier 2 issued under Basel III framework.

AT-1 and Tier 2 bonds will be valued at average of the security level prices provided the valuation agencies. For arriving at security level pricing, waterfall approach to be following by valuation agencies is provided as **Annexure III**.

## 11. Waterfall Mechanism for Valuation of money market and debt and government securities

SEBI vide circular no. SEBI/HO/IMD/DF4/CIR/P/2019/102 dated September 24, 2019 has laid down broad principles for waterfall approach to be followed for valuation of debt, money market and government securities. The said circular prescribes AMFI shall ensure valuation agencies have a documented waterfall approach for valuation of Debt & money market securities.

The AMFI best practices guidelines circular (135/BP/83/2019-20) dated November 18, 2019 provided guidelines on waterfall approach to be followed for valuation money market and debt securities. The waterfall approach is documented in **Annexure II**.

## 12. Changes in the Terms of Investment

While making any change to terms of an investment, AMC shall adhere to the following conditions:

1. Any changes to the terms of investment, including extension in the maturity of a money market or debt security, shall be reported to valuation agencies and SEBI registered Credit Rating Agencies (CRAs) immediately, along-with reasons for such changes.
2. Any extension in the maturity of a money market or debt security shall result in the security being treated as "Default", for the purpose of valuation.
3. If the maturity date of a money market or debt security is shortened and then subsequently extended, the security shall be treated as "Default" for the purpose of valuation.
4. Any put option inserted subsequent to the issuance of the security shall not be considered for the purpose of valuation and original terms of the issue will be considered for valuation.

### **13. Valuation of securities not covered under the current valuation policy:**

1. In case of securities purchased by the mutual fund do not fall within the current framework of the valuation of securities then the mutual fund shall report immediately to AMFI regarding the same. Further, at the time of investment AMC shall ensure that the total exposure in such securities does not exceed 5% of the total AUM of the scheme.
2. AMFI has been advised that the valuation agencies should ensure that the valuation of such securities gets covered in the valuation framework within six weeks from the date of receipt of such intimation from mutual fund.
3. In the interim period, till AMFI makes provisions to cover such securities in the valuation of securities framework, the AMC shall value such securities using their proprietary model which has been approved by their independent trustees and the statutory auditors.

### **14. Treatment of Upfront Fees on Trades**

As Per AMFI Best practice guidelines dated November 18, 2019, following are the guidelines on Upfront Fees on Trades:

1. Upfront fees on all trades (including primary market trades), by whatever name and manner called, would be considered by the valuation agencies for the purpose of valuation of security.
2. Details of such upfront fees should be shared by the AMC on the trade date to the valuation agencies as part of the trade reporting to enable them to arrive at the fair valuation for that date.
3. For accounting, such upfront fees should be reduced from the cost of the investment in the scheme that made the investment.
4. In case upfront fees are received across multiple schemes, then such upfront fees should be shared on a pro-rata basis across such schemes.

### **15. Deviations where the prices given by Valuation Agencies are not considered for valuation.**

In case AMC decides to deviate from the valuation prices or indicative haircut given by the Valuation Agencies, the detailed rationale for each instance of deviation shall be recorded by the AMC. The rationale for deviation along-with details such as information about the security (ISIN, issuer name, rating etc.), price at which the security was valued vis-a-vis the price as per the Valuation Agencies and the impact of such deviation on scheme NAV (in amount and percentage terms) shall be reported to the Board of AMC and Trustees. The rationale for deviation along-with details mentioned above shall be disclosed immediately and prominently, under a separate head on website of AMC. Further, while disclosing the total number of instances of deviation in the monthly and half-yearly portfolio statements. AMC shall also provide the exact link to the website for accessing the information mentioned above.

Note A: The indicative hair communicated by AMFI is as under:

#### **1. Haircuts for senior, secured securities (indicative & subject to change by valuation agencies)**

Rating/Sector	Infrastructure, Real estate, Hotels, Loan against shares and Hospitals	Other Manufacturing and Financial Institutions	Trading, Gems & Jewellery and others
BB	15%	20%	25%
B	25%	40%	50%
C	35%	55%	70%
D	50%	75%	100%

**2. Haircuts on subordinated and unsecured (or both) securities (indicative & subject to change by valuation agencies)**

Rating/Sector	Infrastructure, Real estate, Hotels, Loan against shares and Hospitals	Other Manufacturing and Financial Institutions	Trading, Gems & Jewellery and others
BB	25%	20%	25%
B	50%	40%	50%
C	70%	55%	70%
D	100%	75%	100%

**C. Foreign Securities including ADR/GDR [excluding valuation of units of overseas mutual funds and units of overseas Exchange Traded Funds (ETFs)]**

**a) Traded Securities**

Foreign security shall be valued based on the last quoted closing price available on the overseas stock exchange, where the security is listed, on multiple exchanges, price of the primary stock exchange in the respective jurisdiction would be considered for valuation.

When a security is not traded on stock exchange on the date of valuation, then the previous closing price will be used for valuation, provided such closing price is not exceeding a period of 30 calendar days.

However, in case of an extra ordinary event in other markets during the market hours or post the closure of the markets but before NAV computation, the AMC shall value the security at suitable fair value as determined by the Valuation Committee on a case-to-case basis. Further the valuation committee reserves right to suitably modify the defined priority or valuation methodology by documenting rationale for exception to the above defined policy.

On valuation date, all assets and liabilities in foreign currency shall be valued in Indian Rupees at the reference rate available on FBIL.'s (Financial Benchmarks India Pvt Ltd) website as at the close of banking hours on the relevant business day in India.

**b) Non-traded Securities**

Where the security is not traded, on the date of valuation, on any of the exchanges the last quoted closing price on the selected/primary stock exchange shall be used provided such date is not more than thirty days prior to the valuation date. Securities not traded for more than thirty days shall be valued by AMC at fair value after considering relevant factors on case-to-case basis.

On valuation date, all assets and liabilities in foreign currency shall be valued in Indian Rupees at the reference rate available on FBIL.'s (Financial Benchmarks India Pvt Ltd) website as at the close of banking hours on the relevant business day in India.

#### **D. Investment in Mutual Funds (including ETFs) and corporate debt Market Development Fund of India**

##### **1. Domestic Mutual Funds – Units**

As per guidelines issued by AMFI, Mutual Fund Units (including ETF's) listed and traded on exchanges would be valued at the last quoted closing price on the National Stock Exchange (NSE)/Bombay Stock Exchange (BSE) or other stock exchange, where such security is listed. If not traded on the primary stock exchange, the closing price on the other stock exchange will be considered. NSE will be the primary stock exchange.

Unlisted Mutual Fund Units and listed but not traded Mutual Fund Units (including ETF's) would be valued at the NAV as on the valuation day. In case if on any valuation day the domestic mutual fund is having a non-business day then previous day closing price/NAV would be considered for valuation.

##### **2. Overseas Mutual Funds – Units**

Overseas Mutual Fund Units (including ETF's) listed and traded on exchanges would be valued at the last quoted closing price on the overseas stock exchange, where the security is listed on multiple exchanges, price of the primary stock exchange in the respective jurisdiction would be considered for valuation. Unlisted Mutual Fund Units and listed but not traded Mutual Fund Units (including ETF's) would be valued at the NAV as on the valuation day. In case if on any valuation day the overseas mutual fund is having a non-business day then previous day closing price/NAV would be considered for valuation.

##### **3. Corporate Debt Market Development Fund**

Units of Corporate Debt Market Development Fund (CDMDF) would be valued at the published NAV as on the valuation day.

#### **E. Investments in Real Estate Investment Trust (REITs) and Infrastructure Investment Trust (InvITs)**

##### **a. Allotted but awaiting listing- At allotment price**

##### **b. Listed/Traded/Non-Traded**

REIT and InvIT are valued at the last quoted closing price at the principal stock exchange.

In case REIT/InvIT are not traded on the principal stock exchange on a particular date, the closing price at which it is traded on any other stock exchange will be considered. If the traded price is not available, then valuation shall be as per the direction of Valuation Committee.

Investments in REIT/InvIT shall be valued as follows:

- In case REIT/InvIT is not being traded on any given day, last traded price would be taken as fair market value provided such last trade is not beyond previous 30 days.
- In case REIT/InvIT is not being traded for previous 30 days, latest NAV declared by investment manager of REIT/ InvIT trust shall deemed to be the fair price.
- In case valuation committee can establish a case that NAV as published by investment manager of REIT/InvIT is not representative of fair value than at a price suggested to be fair value.

#### **Notes:**

1. Public Platform refers to:

a) Clearcorp F-TRAC Platform of Clearcorp Dealing Systems (India) Ltd. (CDSIL), NSE & BSE:

For Commercial Papers and Certificate of Deposits

Clearcorp F-TRAC Platform of Clearcorp Dealing Systems (India) Ltd. (CDSIL)

For corporate bonds/debentures and securitized debts order of preference for the Public Platforms for consideration would be as follow:

NSE – NSE  
BSE - ICDM

b) NDS-OM: For Government Securities, Treasury Bills, Cash Management Bills, State Development Loans, Ujwal DISCOM Assurance Yojana (UDAY) Bond, etc.

2. Weighted average YTM / Last Traded YTM shall be rounded up to two digits after decimal point.
3. The valuation of security lent shall be done as per the valuation methodology stated for respective security in Annexure I of this valuation policy. The lending fee received for the security lent would be amortized proportionately, until expiry of the contract.
4. In case of any deviation from the valuation price for money market and debt securities provided by the valuation agencies, AMC shall follow the procedure as mentioned in SEBI Circular No SEBI/HO/IMD/DF4/CIR/P/2019/41 dated March 22, 2019 and SEBI Circular No SEBI/HO/IMD/DF4/CIR/P/2019/102 dated September 24, 2019

**Valuation for Inter Scheme Transfer (IST)**

Inter-scheme transfer of all debt and money market securities would be done as per the Price provided by valuation agencies for the said purpose.

If Prices from both the valuation agencies are received within the pre-agreed turnaround time (TAT) plus an additional grace time of 30 minutes, an average of the prices so received shall be used for IST.

If Prices from only one valuation agency are received within the agreed TAT plus an additional grace time of 30 minutes, then that Price will be used for IST. In case prices from any of the valuation agencies are received beyond the additional grace time of 30 minutes and are adopted for IST trade, then the same shall be approved by Valuation Committee.

For securities where price is not provided by valuation agencies, the below mentioned approach would be adopted.

**For Fixed Income Securities (excluding Government Securities, Treasury Bills, Cash Management Bills, State Development Loans, Ujwal DISCOM Assurance Yojana (UDAY) Bond, etc.)**

**For instruments maturing above 1 year:**

For instruments maturing above one year, inter-scheme will be done at the weighted average yield/price of traded securities (excluding IST of others and own trades of Abakkus MF) will be considered if there are at least two trades, with each trade being of a minimum of Rs.5 crores face value, aggregating to Rs.25 crores or more for the same or similar security on a public platform\*.

**For instruments maturing below 1 year:**

For instruments maturing below one year, the weighted yield/price of traded securities (excluding IST of others and own trades of Abakkus MF) will be taken if there are at least three trades, with each trade being of a minimum of Rs.25 crores face value, aggregating to Rs.100 crores or more for same or similar security on a public platform\*.



If there are eligible trades in the same security, the weighted average YTM of these will be considered. If there are no eligible trades in the same security, then weighted average YTM of similar securities will be considered.

#### **Criteria for identifying the similar securities:**

Similar security should be identified by the following waterfall logic:

1. Same issuer with maturity date within  $\pm 15$  working days of maturity date of security for inter-scheme transfer shall be considered first. If no such instance is available, then Step 2 to be followed: § Example: For inter-scheme transfer of Canara Bank CD maturing on 05-July-2025, all secondary market trades of Canara Bank CD maturing within 14-Jun-2025 to 26-July-2025 will be considered first.
2. Similar security from a different issuer within the same category (PSU Bank, Private Bank or Financial Institution etc) and having same credit rating, with maturity date within  $\pm 15$  days of maturity date of security considered for inter-scheme transfer. § Example: For inter-scheme transfer of Canara Bank CD maturing on 26-July-2025, all secondary market trades of similar public sector bank CDs maturing within 05-July-2025 to 16-Aug-2025 having same credit rating will be considered

**\*\* In case of Bank CDs –**

- ❖ Issuer of the securities having long term rating of AAA and/or AA+ and short -term rating of A1+ will be considered as comparable.
- ❖ Issuer of the securities having long term rating of AA and/or AA- and short-term rating of A1+ will be considered as comparable.
- ❖ Issuer of the securities having long term rating of A+ and below and short-term rating of A1+ will be considered as comparable.

#### **Criteria for identifying similar securities in case of securities having residual maturing below 31 days.**

Similar security should be identified by the following waterfall logic, provided that the maturity date of the security is within the same calendar quarter and should have a residual maturity up to 30 days:

1. Same issuer and same type of asset, with maturity date withing  $\pm 7$  calendar days of maturity date of security shall be considered first and should have a residual maturity upto 30 days. If no such instance is available, then Step 2 will be followed.

**Example:** For Punjab National Bank CD maturing on March 6, 2026, all secondary market trades of Punjab National Bank CDs, maturing within February 27, 2026 to March 13, 2026 will be considered first.

2. Similar security from different issuer within the same category (PSU Bank, Private Bank or Financial Institution etc.) and similar long term credit rating\*\*, with maturity date within  $\pm 7$  calendar days of maturity date of security will be considered and should have a residual maturity up to 30 days.

**Example:** For Punjab National Bank CD maturity on March 6, 2026, all secondary market trades of similar public sector bank CDs, maturing within February 27, 2026 to March 15, 2026 will be considered first.

**\*\* In case of Bank CDs –**

- ❖ Issuer of the securities having long term rating of AAA and/or AA+ and short -term rating of A1+ will be considered as comparable.
- ❖ Issuer of the securities having long term rating of AA and/or AA- and short-term rating of A1+ will be considered as comparable.
- ❖ Issuer of the securities having long term rating of A+ and below and short-term rating of A1+ will be considered as comparable.

For the purpose of determining similar securities, the data available on “Bloomberg” will be used as the source for credit ratings. Further, the classifications of the issuers for similar securities will be into three sectors viz., Banking, Manufacturing and Non-Banking Finance Companies (NBFC). Bank CDs will be compared against bank CDs (within bank CDs, PSU Bank CDs

will be compared to PSU Bank CDs and private/foreign bank CDs will be compared with private/foreign bank CDs) Manufacturing papers will be compared against similar manufacturing papers and NBFC will compare against NBFC.

Further, for the purpose of identification of similar securities, in case of security embedded with 'put and call' option, only those securities with 'put and call' option on the same day and the same 'put and call' option price shall be deemed to mature on such put/call date. All other securities with a 'put and call' option not meeting these criteria would have the final maturity date of the security considered for the purpose of identification of similar securities.

**Notes:**

1. Outlier trades, if any will be ignored after recording suitable justification.
2. If due to the non-availability of traded securities, at the time of the IST, the above mentioned criteria cannot be fulfilled, the IST would be done at the previous day's price/yield.
3. \* Public Platform refers to F-TRAC/ Corporate Bond Reporting Platform (CBRICS)/ Indian Corporate Debt Market (ICDM)/Negotiated Dealing System – Order Management (NDS-OM)/MSE FIRST: for corporate bonds/debentures, commercial paper, certificate of deposits and securitized debt (Applicable only for pricing of IST and not for valuation). Order of preference of public platforms for Bonds will be as follows:  
(i) CBRICS; (ii) ICDM and (iii) MSE First
4. Weighted average yield shall be rounded up to two digits after decimal point.

**Annexure II**

**Valuation Policy – Waterfall Mechanism**

**Part A -Valuation of Money Market and Debt Securities other than G-Secs**

SEBI vide circular no. SEBI/HO/IMD/DF4/CIR/P/2019/102 dated September 24, 2019 has laid down broad principles for waterfall approach to be followed for valuation of debt, money market and government securities. The said circular prescribes AMFI shall ensure valuation agencies have a documented waterfall approach for valuation of Debt & money market securities.

The AMFI best practices guidelines circular (135/BP/83/2019-20) dated November 18, 2019 provided guidelines on waterfall approach to be followed for valuation money market and debt securities.

**(1) Waterfall Mechanism for valuation of money market and debt securities:**

The following shall be the broad sequence of the waterfall for valuation of money market and debt securities:

- (a) Volume Weighted Average Yield (VWAY) of primary reissuances of the same ISIN (whether through book building or fixed price) and secondary trades in the same ISIN.
- (b) VWAY of primary issuances through book building of same issuer, similar maturity (Refer Note 1 below).
- (c) VWAY of secondary trades of same issuer, similar maturity.
- (d) VWAY of primary issuances through fixed price auction of same issuer, similar maturity.
- (e) VWAY of primary issuances through book building of similar issuer, similar maturity (Refer Note 1 below).
- (f) VWAY of secondary trades of similar issuer, similar maturity.
- (g) VWAY of primary issuance through fixed price auction of similar issuer, similar maturity.
- (h) Construction of matrix (polling may also be used for matrix construction)
- (i) In case of exceptional circumstances, polling for security level valuation (Refer Note 2 below)

**Note 1**

Except for primary issuance through book building, polling shall be conducted to identify outlier trades. However, in case of any issuance through book building which is less than INR 100 Cr, polling shall be conducted to identify outlier trades.

**Note 2**

Some examples of exceptional circumstance would be stale spreads, any event/news in particular sector/issuer, rating changes, high volatility, corporate action or such other event as may be considered by valuation agencies. Here stale spreads are defined as spreads of issuer which were not reviewed/updated through trades/primary/polls in same or similar security/issuers of same/similar maturities in waterfall approach in last 6 months.

Further, the exact details and reasons for the exceptional circumstances which led to polling shall be documented and reported to AMCs. Further, a record of all such instances shall be maintained by AMCs and shall be subject to verification during SEBI inspections.

#### Note 3

All trades on stock exchanges and trades reported on trade reporting platforms till end of trade reporting time (excluding Inter-scheme transfers) should be considered for valuation on that day.

#### Note 4

It is understood that there are certain exceptional events, occurrence of which during market hours may lead to significant change in the yield of the debt securities. Hence, such exceptional events need to be factored in while calculating the price of the securities. Thus, for the purpose of calculation of VWAY of trades and identification of outliers, on the day of such exceptional events, rather than considering whole day trades, only those trades shall be considered which have occurred post the event (on the same day).

The following events would be considered exceptional events:

- i. Monetary I Credit Policy
- ii. Union Budget
- iii. Government Borrowing I Auction Days
- iv. Material Statements on Sovereign Rating
- v. Issuer or Sector Specific events which have a material impact on yields
- vi. Central Government Election Days
- vii. Quarter end days

In addition to the above, valuation agencies may determine any other event as an exceptional event. All exceptional events along-with valuation carried out on such dates shall be documented with adequate justification.

## **(2) Definition of tenure buckets for Similar Maturity**

When a trade in the same ISIN has not taken place, reference should be taken to trades of either the same issuer or a similar issuer, where the residual tenure matches the tenure of the bond to be priced. However, as it may not be possible to match the exact tenure, it is proposed that tenure buckets are created and trades falling within such similar maturity be used as per table below.

<b>Residual Tenure of Bond to be priced</b>	<b>Criteria for similar maturity</b>
Upto 1 month	Calendar weekly Bucket
Greater than 1 month to 3 months	Calendar fortnightly bucket
Greater than 3 months to 1 year	Calendar monthly bucket
Greater than 1 year to 3 years	Calendar quarterly bucket
Greater than 3 years	Calendar half-yearly or Greater bucket

In addition to the above:

- a. In case of market events, or to account for specific market nuances, valuation agencies may be permitted to vary the bucket in which the trade is matched or to split buckets to finer time periods as necessary. Such changes shall be auditable. Some examples of market events I nuances include cases where traded yields for securities with residual tenure of less than 90 days and more than 90 days are markedly different even though

both may fall within the same maturity bucket, similarly for less than 30 days and more than 30 days or cases where yields for the last week v/s second last week of certain months such as calendar quarter ends can differ.

- b. In the case of illiquid/ semi liquid bonds, it is proposed that traded spreads be permitted to be used for longer maturity buckets (1year and above). However, the yield should be adjusted to account for steepness of the yield curve across maturities.
- c. The changes I deviations mentioned in clauses a and b, above, should be documented, along with the detailed rationale for the same. Process for making any such deviations shall also be recorded. Such records shall be preserved for verification.

### **(3) Process for determination of similar issuer**

Valuation agencies shall determine similar issuers using one or a combination of the following criteria. Similar issuer does not always refer to issuers which trade at same yields but may carry spreads amongst themselves & move in tandem or they are sensitive to specific market factor/s hence warrant review of spreads when such factors are triggered.

- i. Issuers within same sector/industry and/or
- ii. Issuers within same rating band and/or
- iii. Issuers with same parent/within same group and/or
- iv. Issuers with debt securities having same guarantors and/or
- v. Issuers with securities having similar terms like Loan Against Shares (LAS)/ Loan Against Property (LAP).

The above criteria are stated as principles and the final determination on criteria, and whether in combination or isolation shall be determined by the valuation agencies. The criteria used for such determination should be documented along with the detailed rationale for the same in each instance. Such records shall be preserved for verification. Similar issuers which trade at same level or replicate each other's movements are used in waterfall approach for valuations. However, similar issuer may also be used just to trigger the review of spreads for other securities in the similar issuer category basis the trade/news/action in any security/ies within the similar issuer group.

### **(4) Recognition of trades and outlier criteria**

#### **1. Volume criteria for recognition of trades (marketable lot)**

Paragraph 1.1.1.1(a) of SEBI vide circular no. SEBI/HO/IMD/DF4/CIR/P/2019/102 dated September 24, 2019 on Valuation of money market and debt securities, prescribes that the marketable lots shall be defined by AMFI, in consultation with SEBI.

In this regard, marketable lot is defined as under.

The following volume criteria shall be used for recognition of trades by valuation agencies:

Parameter	Minimum Volume Criteria for marketable lot
Primary	INR 25 cr. for both Bonds/NCD/CP/CD and other money market instruments
Secondary	INR 25 cr. for CP/ CD, T-Bills and other money market instruments
Secondary	INR 5 Cr for Bonds/NCD/G-secs

Trades not meeting the minimum volume criteria i.e. the marketable lot criteria as stated above shall be ignored.

#### **2. Outlier Criteria**

It is critical to identify and disregard trades which are aberrations, do not reflect market levels and may potentially lead to mispricing of a security or group of securities. Hence, the following broad principles would be followed by valuation agencies for determining outlier criteria.

- Outlier trades shall be classified on the basis of liquidity buckets (Liquid, Semi-liquid, and Illiquid). Price discovery for liquid issuers is generally easier than that of illiquid issuers and hence a tighter pricing band as compared to illiquid issuers would be appropriate
- The outlier trades shall be determined basis the yield movement of the trade, over and above the yield movement of the matrix. Relative movement ensures that general market movements are accounted for in determining trades that are outliers. Hence, relative movement over and above benchmark movement shall be used to identify outlier trades.
- Potential outlier trades which are identified through objective criteria defined above will be validated through polling from market participants. Potential outlier trades that are not validated through polling shall be ignored for the purpose of valuation.
- The following criteria shall be used by valuation agencies in determining Outlier Trades

Liquidity Classification    Bps Criteria (yield movement over Previous Day yield after accounting for yield movement for matrix)

	Upto 15 days	15-30 days	Greater than 30days
Liquid	30 bps	20 bps	10 bps
Semi-Liquid	45 bps	35 bps	20 bps
Illiquid	70 bps	50 bps	35 bps

The above criteria shall be followed consistently and would be subject to review on a periodic basis by valuation agencies and any change would be carried in consultation with AMFI.

- In order to ensure uniform process in determination of outlier trades the criteria for liquidity classification shall be as detailed below.

#### Liquidity classification criteria - liquid, semi-Liquid and Illiquid definition

Valuation agencies shall use standard criteria for classifying trades as Liquid, Semi-Liquid and illiquid basis the following two criteria.

- Trading Volume
- Spread over reference yield

Such criteria shall be reviewed on periodic basis in consultation with AMFI.

#### Trading Volume (Traded days) based criteria:

Number of unique days an issuer trades in the secondary market or issues a new security in the primary market in a calendar quarter

- Liquid  $\geq 50\%$  of trade days
- Semi liquid
- Illiquid

$\geq 10\%$  to 50% trade days

$< 10\%$  of trade days

#### Spread based criteria:

Spread over the matrix shall be computed and based on thresholds defined, issuers shall be classified as liquid, semi liquid and illiquid. For bonds thresholds are defined as up to 15 bps for liquid;  $>15-75$  bps for semi-liquid;  $> 75$  bps for illiquid. (Here, spread is computed as average spread of issuer over AAA Public Sector Undertakings/Financial Institutions/Banks matrix),

For CP/ CD- up to 25 bps for liquid;  $>25- 50$  bps for semiliquid;  $>50$  bps for illiquid. (Here, spread is computed as average spread of issuer over A1+/AAA CD Bank matrix).

The thresholds shall be periodically reviewed and updated having regard to the market.

The best classification (liquid being the best) from the above two criteria (trading volume and spread based) shall be considered as the final liquidity classification of the issuer. The above classification shall be carried out separately for money market instruments (CP/ CDs) and bonds.

##### **(5) Process for Construction of Matrix**

Valuation agencies shall follow the below process in terms of calculating spreads and constructing the matrix:

<b>Steps</b>	<b>Detailed Process</b>
Step 1	Segmentation of corporates the entire corporate sector is first categorised across following four sectors i.e. all the corporates will be catalogued under one of the below mentioned bucket: 1. Public Sector Undertakings/Financial Institutions/Banks; 2. Non-Banking Finance Companies -except Housing Finance Companies; 3. Housing Finance Companies; 4. Other Corporates
Step 2	Representative issuers – For the aforesaid 4 sectors, representative issuers (Benchmark Issuers) shall be chosen by the valuation agencies for only higher rating (i.e. "AAA" or AA+). Benchmark/Representative Issuers will be identified basis high liquidity, availability across tenure in AAA/AA+ category and having lower credit/liquidity premium. Benchmark Issuers can be single or multiple for each sector. It may not be possible to find representative issuers in the lower rated segments, however in case of any change in spread in a particular rating segment, the spreads in lower rated segments should be suitably adjusted to reflect the market conditions. In this respect, in case spreads over benchmark are widening at a better rated segment, then adjustments should be made across lower rated segments, such that compression of spreads is not seen at any step. For instance, if there is widening of spread of AA segment over the AAA benchmark, then there should not be any compression in spreads between AA and A rated segment and so on.
Step 3	<b>Calculation of benchmark curve and calculation of spread –</b> 1. Yield curve to be calculated for representative issuers for each sector for maturities ranging from 1month till 20 years and above. 2. Waterfall approach as defined in Part A (1) above will be used for construction of yield curve of each sector. 3. In the event of no data related to trades/primary issuances in the securities of the representative issuer is available, polling shall be conducted from market participants 4. Yield curve for Representative Issuers will be created on daily basis for all 4 sectors. All other issuers will be pegged to the respective benchmark issuers depending on the sector, parentage and characteristics. Spread over the benchmark curve for each security is computed using latest available. trades/primaries/polls for respective maturity bucket over the Benchmark Issuer. 5. Spreads will be carried forward in case no data points in terms of trades/primaries/polls are available for any issuer and respective benchmark movement will be given.
Step 4	1. The principles of VWAY, outlier trades and exceptional events shall be applicable while constructing the benchmark curve on the basis of trades/primary issuances. 2. In case of rating downgrade/credit event/change in liquidity or any other material event in Representative Issuers, new Representative Issuers will be identified. Also, in case there are two credit ratings, the lower rating to be considered. 3. Residual tenure of the securities of representative issuers shall be used for construction of yield curve.

#### **Part B: Valuation of G-Secs (T-Bill, Cash management bills, G-Sec and SDL)**

The following is the waterfall mechanism for valuation of Government securities:

- VWAY of last one hour, subject to outlier validation
- VWAY for the day (including a two quote, not wider than 5 bps on NDSOM), subject to outlier validation
- Two quotes, not wider than 5 bps on NDSOM, subject to outlier validation
- Carry forward of spreads over the benchmark
- Polling etc.

#### Notes:

1. VWAY shall be computed from trades which meet the marketable lot criteria stated in Part A of these Guidelines.
2. Outlier criteria: Any trade deviating by more than +/- 5 bps post factoring the movement of benchmark security shall be identified as outlier. Such outlier shall be validated through polling for inclusion in valuations. If the trades are not validated, such trades shall be ignored.

### Annexure III

Valuation of AT-1 and Tier II Bonds issued under Basel III framework.

#### I. Deemed Residual Maturity Bonds

The Deemed Residual Maturity for the purpose of valuation as Macaulay Duration for existing as well new perpetual bonds issued:

Time Period	Deemed Residual Maturity (Years)
March 31, 2023 onwards	100

The Macaulay Duration is proposed to be calculated as under the Tier II Bonds:

Time Period	Deemed Residual Maturity for all securities (Years)
April 01, 2022 onwards	Actual Maturity

1. If the issuer does not exercise call option for any ISIN, then maturity of bonds to be considered as 100 years from the date of issuance of the AT-1 Bonds and contractual maturity of Tier II – Bonds for all the ISINs of the said issuer.
2. If the non-exercise of call option is due to financial stress or in case of adverse news, the same must be reflected in the valuation.

#### II. Guidelines for Valuation

##### 1. Form two types of ISINs:

- a) Benchmark ISINs (a non-benchmark ISIN can be linked to only one benchmark ISIN. Currently, SBI ISINs happen to be the benchmark ISINs across all maturities of AT-1 Bonds).
- b) Non-benchmark ISINs. (will be divided into multiple groups based on similar issuer and similar maturity).
- c) The groups will be decided in consultation with valuation agencies. The two main criteria envisaged to be used here would be Tier 1/Tier 2 ratings of the ISINs/Issuers, and the spread range in which the group of ISINs/Issuer's trade over the benchmark.

##### 2. Take a look back period for trade recognition w.e.f. October 1, 2021, as under

- a) 7 (Previously 15) working days for benchmark ISINs
- b) 15 (Previously 30) working days for non-benchmark ISINs



**Note 1**

- a) If the ISIN gets traded, the traded YTM will be taken for the purpose of valuation.
- b) If 1 ISIN of the issuer trades, all other ISINs of issuers will be considered as traded but with necessary adjustment of spread to YTM.
- c) If none of the ISIN of the issuer get trade, the trade of similar issuer in the group will be taken for valuation. However, with necessary adjustment of spread to YTM of similar issuer similar maturity. If none of the ISIN in a group gets traded on any particular day, an actual trade in a look back period will be seen.
- d) If there is an actual trade in look back period, the security will be considered as traded and valued with necessary adjustment of spread to YTM. According to this valuation will be done based on the trade of issuer, trade of another issuer and as an additional layer a look back period of is requested. It is confirmed the spread over YTM will be taken without any adjustment of modified duration to call.

**Note 2**

As the valuation is based on trade during the look back period, it is confirmed that a spread will be adjusted to reflect adverse news, change in credit rating, interest rate etc., which has bearing on the yield of ISIN being valued.

**Note 3**

If there is no actual trade of any ISIN of the issuer as well as similar issuer during look back period also, then valuation will be done by taking spread over matrix and/or polling in line with the water mechanism prescribed by AMFI.

**Note 4**

AT-1 and Tier 2 Bonds being different categories of bonds, the valuation of these bonds will be done separately. i.e. ISIN of AT-1 bond traded will not mean that ISIN of Tier -2 bonds of the same issuer have also been traded. However, if any issuer does not exercise call option for any ISIN, then the valuation and calculation of Macaulay Duration should be done considering maturity of 100 years from the date of issuance for AT-1 Bonds and Contractual Maturity for Tier 2 bonds, for all ISINs of the issuer.

**CRISIL/ICRA DISCLAIMER** - By using the valuation contained in this document, the user acknowledges and accepts that the valuations are provided severally (and not jointly) by the service providers and are subject to the following disclaimers and exclusion of liability which operate severally to the benefit of the relevant service provider and AMFI. The valuation uses the methodology discussed by the service providers with the Association of Mutual Funds in India (AMFI) and reflects the service providers' assessment as to the value of the relevant securities as at the date of the valuation. This is an indicative value of the relevant securities on the valuation date and can be different from the actual realizable value of the securities. The valuation is based on the information provided or arranged by or on behalf of the asset management company concerned (AMC) or obtained by the service providers from sources they consider reliable. Neither AMFI nor the service providers guarantee the completeness or accuracy of the information on which the valuation is based. The user of the valuations takes the full responsibility for any decisions made on the basis of the valuations. Neither AMFI nor the service providers accept any liability (and each of them expressly excludes all liability) for any such decision or use.

**COMPUTATION OF NAV**

**A. Policy of Computation of NAV**

The AMC will calculate the NAVs for all the Business Days. The Net Asset Value of the scheme shall be calculated on daily basis and disclosed in the manner specified by SEBI. AMC shall update the NAVs on its website (<https://www.abakkusmf.com>) and of the Association of Mutual Funds in India ("AMFI") ([www.amfiindia.com](http://www.amfiindia.com)) before 11.00 p.m. every Business Day.

The Net Asset Value (NAV) per Unit of the Scheme 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 Schedule VIII of the SEBI (MF) Regulations, or such norms as may be specified by SEBI from time to time. In case of any conflict between the Principles of Fair Valuation and valuation guidelines specified by SEBI, the Principles of Fair Valuation shall prevail.

The Net Assets Value (NAV) of the Units under the Scheme shall be calculated as shown below:

$$\text{NAV (Rs.)} = \frac{\text{Market or Fair Value of Scheme's Investments} + \text{Current Assets including Accrued Income} - \text{Current Liabilities and Provisions}}{\text{No. of Units outstanding under Scheme on the Valuation Day}}$$

The NAV shall be calculated up to two 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 Option. The NAVs of the Growth Option and the Dividend Option will be different after the declaration of the first Dividend.

Illustration on Computation of NAV: If the net assets of the Scheme are Rs. 10,55,55,000.00 and units outstanding are 1,00,00,000 then the NAV per unit will be computed as follows:  $10,55,55,000.00 / 1,00,00,000 = \text{Rs. } 10.5555$  per unit.

#### **Ongoing price for Redemption/Switch outs (to other schemes/plans of the Mutual Fund) by Investors.**

Ongoing price for redemption/Switch out (to other Schemes/Plans of the Mutual Fund) is the price which a Unit holder will receive for redemption/Switch-outs. During the continuous offer of the Scheme, the Unit holder can redeem the Unit at Applicable NAV.

Investors/Unit holders should note that the AMC/Trustee has right to modify existing Load structure and to introduce Loads subject to a maximum limits prescribed under the Regulations.

Any change in Load structure will be effective on prospective basis and will not affect the existing Unit holder in any manner.

Pursuant to Regulation 49 (3) the repurchase Price of the units of an open ended scheme will not be lower than 95% of the NAV. Any imposition or enhancement of Load in future shall be applicable on prospective investments only.

#### **Methodology for calculation of sale and re-purchase price of the units of mutual fund scheme:**

Let's assume that the NAV of a Mutual Fund Scheme on April 01, 2024 is Rs. 10/-.

##### **Purchase of mutual fund units:**

The Purchase Price of the Units on an ongoing basis will be same as Applicable NAV.

Purchase Price = Applicable NAV

In the above example, purchase is done on April 01, 2024, when the Applicable NAV = Rs. 10/-

Therefore, Purchase Price = Rs. 10/-

As per existing Regulations, no entry load is charged with respect to applications for purchase / additional purchase of mutual funds units.

##### **Redemption/Re-purchase of mutual fund units**

The Redemption Price of the Units will be calculated on the basis of the Applicable NAV subject to prevailing Exit Load, if any. In case of redemption, the amount payable to the investor shall be calculated as follows:

Redemption Price = Applicable NAV \* (1 - Exit Load)

Say, in the above example the exit load applicable is:

For exit on or before 12 months from the date of allotment – 1.00%

For exit after 12 months from the date of allotment – Nil.

##### **Scenario 1: Redemption is done during applicability of exit load**

In case the investor requests for redemption on or before 12 months i.e. on or before March 31, 2025; say December 1, 2024, when the NAV of the scheme is Rs. 12/- and the exit load applicable is 1%, so the Redemption amount payable to investor shall be calculated as follows:

$$\begin{aligned} \text{Redemption Price} &= \text{Applicable NAV} * (1 - \text{Exit Load}) \\ &= \text{Rs. } 12 * (1 - 1\%) = \text{Rs. } 11.88/- \end{aligned}$$

#### **Scenario 2: Redemption is done when the exit load is NIL**

In case the investor requests for redemption after 12 months i.e. after March 31, 2025; say April 1, 2025, when the NAV of the scheme is Rs. 12/- and the exit load applicable is NIL, so the Redemption amount payable to investor shall be calculated as follows:

$$\begin{aligned} \text{Redemption Price} &= \text{Applicable NAV} * (1 - \text{Exit Load}) \\ &= \text{Rs. } 12 * (1 - 0) = \text{Rs. } 12/- \end{aligned}$$

#### **B. Policy for Computation of NAV in foreign securities**

The AMC will calculate and disclose the NAVs for all the Business Days. The Net Asset Value of the scheme shall be calculated on daily basis and disclosed in the manner specified by SEBI. AMC shall calculate and update the NAVs of the Scheme on its website (<https://www.abakkusmf.com>) and of the Association of Mutual Funds in India ("AMFI") ([www.amfiindia.com](http://www.amfiindia.com)) on next Business day by 10.00 a.m. 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 of the following business day of the next business day 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.

The Net Asset Value (NAV) per Unit of the Scheme 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 Schedule VIII of the SEBI (MF) Regulations, or such norms as may be specified by SEBI from time to time.

The Net Assets Value (NAV) of the Units under the Scheme shall be calculated as shown below:

$$\begin{aligned} \text{NAV (Rs.)} &= \frac{\begin{array}{l} \text{Market or Fair} \\ \text{Value of Scheme's} \\ \text{Investments} \end{array} + \begin{array}{l} \text{Current Assets} \\ \text{including Accrued} \\ \text{Income} \end{array} - \begin{array}{l} \text{Current Liabilities} \\ \text{and Provisions} \end{array}}{\text{No. of Units outstanding under Scheme on the Valuation Day}} \end{aligned}$$

The NAV shall be calculated up to two 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 Option. The NAVs of the Growth Option and the Dividend Option will be different after the declaration of the first Dividend.

The NAVs will be calculated for all the Business days.

Pursuant to Regulation 49 (3) the repurchase Price of the units of an open ended scheme will not be lower than 95% of the NAV. Any imposition or enhancement of Load in future shall be applicable on prospective investments only.

Illustration on Computation of NAV: If the net assets of the Scheme are Rs. 10,55,55,000.00 and units outstanding are 1,00,00,000 then the NAV per unit will be computed as follows:  $10,55,55,000.00 / 1,00,00,000 = \text{Rs. } 10.5555$  per unit.

#### **Ongoing price for Redemption /Switch outs (to other schemes/plans of the Mutual Fund) by Investors.**

Ongoing price for redemption /Switch out (to other Schemes/Plans of the Mutual Fund) is the price which a Unit holder will receive for redemption/Switch-outs. During the continuous offer of the Scheme, the Unit holder can redeem the Unit at Applicable NAV.

Investors/Unit holders should note that the AMC/Trustee has right to modify existing Load structure and to introduce Loads subject to a maximum limits prescribed under the Regulations.

Any change in Load structure will be effective on prospective basis and will not affect the existing Unit holder in any manner.

Pursuant to Regulation 49 (3) the repurchase Price of the units of an open ended scheme will not be lower than 97% of the NAV. Any imposition or enhancement of Load in future shall be applicable on prospective investments only.

### **C. Procedure in case of delay in disclosure of NAV**

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 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.

## **IX. TAX & LEGAL & GENERAL INFORMATION**

### **A. Taxation on investing in Mutual Funds**

The following outline of tax implications is provided for general information purposes only, based on the law prevailing as at the date of this document and also incorporating the amendments made by the Finance Act, 2025. These implications should be considered in light of the specific facts of each individual case. Furthermore, in the event of periodic amendments to the relevant legislation, the nature and/or quantum of these benefits/implications are subject to change.

Accordingly, it is recommended that each unit holder should appropriately consult its tax consultant with respect to the specific tax implications arising out of their participation in the scheme.

#### **I. To the Mutual Fund:**

##### **Income in the hands of the Mutual Fund**

The entire income of a Mutual Fund registered under the Securities and Exchange Board of India Act, 1992 or any regulations made thereunder is exempt from income tax in accordance with the provisions of section 10(23D) of the Income-tax Act, 1961 ('the Act').

Income received by a Mutual Fund is not liable for the deduction of income tax at source as per the provisions of section 196(iv) of the Act. Where the Mutual Fund receives any income from investments made in overseas jurisdictions, this income may be subject to withholding in the relevant jurisdiction. As the income of the Mutual Fund is exempt from tax in India, credits/ refunds in relation to these foreign taxes may not be available in India.

##### **Distribution of income by the Mutual Fund to the unit holders**

Distribution of income by the Mutual Fund to the unitholders will be taxed directly in the hands of the unitholders of the mutual fund at the tax rates applicable to them. Further, the taxpayer can claim a deduction of interest expenditure only under section 57 of the Act which shall be restricted to 20% of the gross dividend income.

#### **II. To the unit holders:**

##### **Deduction from total income**

Under section 80C of the Act, an assessee, being an individual or HUF, is eligible to claim a deduction up to an aggregate of Rs. 1.50 lakhs on account of sums paid as subscription to units of an Equity Linked Savings Scheme ('ELSS'), provided the assessee is not opting for default tax regime under Section 115BAC of the Act.

ELSS refers to a scheme formulated under Equity Linked Savings Scheme, 2005, as notified by the Central Board of Direct Taxes, Ministry of Finance vide notification dated 3 November 2005 as amended vide notification dated 13 December, 2005.

### **Securities Transaction Tax**

Under chapter VII of the Finance (No. 2) Act, 2004, the unit holder is liable to pay Securities Transaction Tax ('STT') on any 'taxable securities transaction' at the applicable rate. Taxable securities transactions include sale of units of an equity oriented fund, entered into on the stock exchange or the sale of units of an equity oriented fund to the Mutual Fund.

The purchaser of the units of an equity oriented fund is not liable to pay STT, where the purchase is entered into on a recognized stock exchange and the contract for the purchase of such units is settled by the actual delivery or transfer of such units.

The seller of the units of an equity oriented fund is liable to pay STT at 0.001%, where the sale is entered into on a recognized stock exchange and the contract for sale of such units is settled by the actual delivery or transfer of such units.

At the time of the sale of units of an equity oriented fund to the Mutual Fund, the seller is required to pay STT @ 0.001%. STT is not applicable on purchase/sale/redemption of units other than equity oriented units.

STT is not deductible for the computation of capital gains. However, if it is held that gains on the sale of securities are in the nature of business profits, then for the purpose of computing the business income, an amount equivalent to the STT paid on the transaction value will be allowed as a deduction from the gains earned, under section 36 of the Act.

We have tabulated below the STT rates applicable on sale/purchase of various securities for your ease of reference:

<b>Transactions/Particulars</b>	<b>Payable by Purchaser</b>	<b>Payable by Seller</b>
Delivery based purchase/sale transaction in equity shares entered into in a recognized stock exchange	0.1%	0.1%
Non-delivery-based sale transaction in equity shares or units of equity-oriented fund entered in a recognised stock exchange	N.A.	0.025%
Delivery based sale transaction of unit of equity-oriented fund	N.A.	0.001%
Sale of options in securities	0.125% of the difference between the strike price and settlement price of the option (In case option is exercised)	0.1%
Sale of futures in securities	N.A.	0.02%
Sale of unlisted shares under an offer for sale to the public	N.A.	0.2%
Sale of a unit of an equity-oriented fund to the Mutual Fund	N.A.	0.001%

### **Incomes from units**

Income in the nature of dividends distributed by mutual funds will be taxable in the hands of the unitholders under section 56 of the ITA under the head 'Income from Other Sources' at the applicable rates. Further, the taxpayer can claim a deduction of interest expenditure only under section 57 of the Act which shall be restricted to 20% of the gross dividend income.

## **Tax deduction at source (TDS) on income distributed by mutual funds:**

### **Resident unitholders**

Section 194K provides that mutual funds are required to withhold tax on income in respect of units at the rate of 10% on income (in excess of INR 10,000) paid to a resident. It has been clarified that the provisions of section 194K of the Act shall apply only in respect of income in the nature of dividends (IDCW) distributed by the mutual fund and shall not apply in respect of income which is in the nature of capital gains on units of mutual fund.

### **Non-resident unitholders**

Section 196A of the Act requires mutual fund to withhold taxes on income in respect of units at the rate of 20% (plus applicable surcharge and health and education cess) or the rates provided in the tax treaty on any income paid to a non-resident, subject to fulfilment of certain conditions for being able to avail benefits under the tax treaty viz. obtain a valid tax residency certificate (TRC) and electronically file Form 10F.

Under Section 196D of the Act, a 20% withholding tax rate (plus applicable surcharge and cess) applies to income from securities referred to in section 115AD(1)(a) paid to Foreign Institutional Investors (FII)<sup>1</sup>. However, tax treaty benefits can be claimed at the time of withholding tax on income with respect to securities, if the FII provides a tax residency certificate and other necessary documents required to claim treaty benefits. Additionally, no withholding is required for capital gains from the transfer of securities as specified under Section 115AD of the Act.

### **Gains on transfer/redemption of units**

Gains arising on transfer/redemption of units, as well as from switching between schemes will be chargeable to tax under the Act. The characterization of income from investments in securities as 'business income' or 'capital gains' should be examined on a case-by-case basis.

Any securities held by a Foreign Institutional Investor ('FII')[1] which have invested in such securities in accordance with the regulations made under Securities and Exchange Board of India Act, 1992, should be regarded as capital assets. Thus, gains arising on transfer/redemption of units by FIIs should be characterized as capital gains.

The CBDT has issued Circular No. 6 of 2016, dated February 29, 2016 providing that listed shares/securities held for more than 12 months would be treated as capital gains unless the tax payer himself treats the same as stock in trade; in other cases, involving sale of listed shares/securities, the characterization of income would be decided on the basis of previous circulars and instructions issued by the CBDT on this subject. The Circular also provides that a position once adopted by the taxpayer would not be allowed to be changed and it would be applicable for the subsequent assessment years. It is however clarified that the principles as outlined in the circular shall not be applicable in cases where the genuineness of the transaction itself is questionable.

### **Business Income**

Where the units of the Mutual Fund are regarded as business assets, then any gains arising from the transfer/redemption of units would be taxed under the head of "Profits and gains of business or profession" under section 28 of the Act. The gain/loss is to be computed under the head of "Profits and gains of business or profession" after allowing for normal business expenses (inclusive of the expenses incurred on the transfer).

Business income is chargeable to tax at the following rates:

<b>Assessee</b>	<b>% of Income Tax</b>
Individuals, HUFs, Association of Persons	Applicable Slab Rate*
Partnership Firms, including Limited Liability Partnerships ('LLPs') & Indian Corporates**	30%
Foreign Companies	35%

\*The Finance (No. 2) Act 2024 has amended the provisions of Section 115BAC to make new tax regime the default tax regime. The slab rates as prescribed under section 115BAC(1A) of the ITA [as amended by Finance Act, 2025 and effective from FY 2025-26] are as under:

Total Income	Tax rates (excluding surcharge and cess)
Up to INR 4,00,000	Nil
From INR 4,00,001 to INR 8,00,000	5%
From INR 8,00,001 to INR 12,00,000	10%
From INR 12,00,001 to INR 16,00,000	15%
From INR 16,00,001 to INR 20,00,000	20%
From INR 20,00,001 to INR 24,00,000	25%
Above INR 24,00,000	30%

However, the taxpayers have the option to opt out of new tax regime and choose to be taxed under old tax regime. The slab rates as per the old tax regime are as under:

Total Income	Tax rates (excluding surcharge and cess)
Up to INR 2,50,000 <sup>^</sup>	Nil
From INR 2,50,001 to INR 5,00,000	5%
From INR 5,00,001 to INR 10,00,000	20%
INR 10,00,001 and above	30%

<sup>^</sup>In case of a resident individual of the age of 60 years or more but less than 80 years, the basic exemption limit is INR 3,00,000. In case of a resident individual of the age of 80 years or more, the basic exemption limit is INR 5,00,000.

**\*\***A tax rate of 25% (plus applicable surcharge and health and education cess) is applicable for the financial year 2025-26 in the case of domestic companies having total turnover or gross receipts not exceeding Rs. 400 crores in the financial year 2023-24. Domestic companies may opt for a lower tax rate of 22% (plus fixed surcharge at the rate of 10% and health and education cess) (as per section 115BAA of the Act), subject to fulfillment of prescribed conditions. Further, new domestic manufacturing companies may opt for a lower tax rate of 15% (plus fixed surcharge at the rate of 10% and health and education cess) (as per section 115BAB of the Act), subject to fulfillment of prescribed conditions.

Unless specifically stated, the income-tax rates specified above and elsewhere in this document are exclusive of the applicable surcharge and health and education cess. The rates of surcharge applicable for financial year 2025-26 are given below:

Type of Investor	Surcharge* rate as a % of income-tax					
	If income is less than Rs. 50 lakhs	If income exceeds Rs. 50 lakhs but less than Rs. 1 crore	If income exceeds Rs. 1 crore but less than Rs.2 crores	If income exceeds Rs. 2 crore but less than Rs. 5 crores	If income exceeds Rs. 5 crores but less than Rs. 10 crores	If income exceeds Rs. 10 crores
Individual, HUF, AOP (in respect of dividend income from domestic companies, income arising in the nature of long term capital gains on transfer of	Nil	10%	15%			



capital assets and income on which tax is payable in accordance with section 111A of the Act)					
Individual, HUF, AOP (in respect of income other than dividend income from domestic companies, income arising in the nature of long term capital gains on transfer of capital assets and income on which tax is payable in accordance with section 111A of the Act)	Nil	10%	15%	25%	37% (Refer Note 1)
Partnership Firm (including LLP)	Nil	Nil	12%		
Domestic Company (income other than income chargeable to tax under section 115BAA and section 115BAB)	Nil	Nil	7%		12%
Domestic Company (paying taxes under section 115BAA and section 115BAB)	10%				
Foreign Company	Nil	Nil	2%		5%

\* Additionally, health and education cess is leviable @ 4% on the income tax and surcharge as computed above.

Note 1: Under the default tax regime i.e. as per Section 115BAC of the Act, maximum surcharge applicable to an individual, HUF, AOP, BOI shall be restricted to 25%. If the assessee opts not to be governed by the default tax regime, then the surcharge rate of 37% shall apply for income exceeding INR 5 crore.

### **Capital Gains**

The mode of computation of capital gains would be as follows:

Sale Consideration			xxx
Less: Cost of Acquisition (Note 1)		(xxx)	
Expenses on Transfer (Note 2)	(xxx)		
<b>Capital Gains</b>			<b>xxx</b>

Note 1: The benefit of cost inflation index is not available while computing capital gains on transfer of long- term capital asset.

Note 2: This would include only expenses relating to transfer of units.

### **Period of holding**

The period of holding has been tabulated below:

Sr. No.	Category of mutual fund scheme	Sub-category of mutual fund scheme	Listed/Unlisted	Period of Holding for Long term
1	Equity Oriented Mutual	Equity Mutual Fund	N/A	More than 12 Months

	Funds (Note 1)	Equity Fund of Funds	N/A	More than 12 Months
2	Specified Mutual Funds	Debt Mutual Fund/ Conservative Hybrid Funds/Money Market Funds etc.	Listed/Unlisted	Deemed short term capital gains
3	Other Mutual Funds	Gold ETF, Silver ETF & International ETFs	Listed	More than 12 Months
			Unlisted	More than 24 Months

**Notes:**

1. In case of ELSS, the units are subject to a lock-in period of 3 years. Accordingly, any sale of units after this lock-in period will qualify as a long-term capital gain.
2. As per section 50AA of the Act, “specified mutual fund” means (a) a Mutual Fund by whatever name called, which invests more than sixty-five per cent of its total proceeds in debt and money market instruments; or (b) a fund which invests sixty-five per cent or more of its total proceeds in units of a fund referred to in sub- clause (a).”

Provided that the percentage of investment in debt and money market instruments or in units of a fund, as the case may be, in respect of the Specified Mutual Fund, shall be computed with reference to the annual average of the daily closing figures.

Provided further that for the purposes of this clause, “debt and money market instruments” shall include any securities, by whatever name called, classified or regulated as debt and money market instruments by the Securities and Exchange Board of India.’.

The above definition of “specified mutual fund” will be effective from 01 April 2025.

### Capital gains - In the case of equity oriented fund (EOF)

Tax Status of Investor	Capital Gains Tax		Tax on Distributed Income under Dividend Option
	Short Term	Long Term	
Resident Individual/HUF/AOP/BOI	20%	12.5%	At the applicable slab rate*
Domestic Companies			
NRIs			
FII <sup>1</sup>			20%

\*Kindly refer to the tabulated slab rate chart mentioned above

### Notes:

- As per section 112A of the Act, long-term capital gains on transfer of units of EOFs exceeding ₹ 1,25,000 shall be taxable @ 12.5% provided transfer of such units is subject to STT, without giving effect to first and second proviso to section 48 i.e., without taking benefit of foreign currency fluctuation and indexation benefit. Further, cost of acquisition to compute long-term capital gains is to be higher of (a) Actual cost of acquisition; and (b) Lower of (i) fair market value as on 31 January 2018; and (ii) full value of consideration received upon transfer.
- "Equity oriented fund" has been defined to mean a fund set up under a scheme of a mutual fund specified under clause (23D) of section 10 and,—
  - (i) in a case where the fund invests in the units of another fund which is traded on a recognized stock exchange,—
    - (A) a minimum of ninety per cent of the total proceeds of such fund is invested in the units of such other fund; and
    - (B) such other fund also invests a minimum of ninety per cent of its total proceeds in the equity shares of domestic companies listed on a recognized stock exchange; and
  - (ii) in any other case, a minimum of sixty-five per cent of the total proceeds of such fund is invested in the equity shares of domestic companies listed on a recognized stock exchange

Further it is stated that the percentage of equity shareholding or unit held in respect of the fund, as the case may be, shall be computed with reference to the annual average of the monthly averages of the opening and closing figures.

- In cases where the taxable income, reduced by long term capital gains of a resident individual or HUF is below the taxable limit, the long term capital gain will be reduced to the extent of this shortfall and only the balance of the long term capital gain is chargeable to income tax. In case where the taxable income as reduced by short term capital gains of a resident individual or HUF is below the taxable limit, the short term capital gain will be reduced to the extent of this shortfall and only the balance short term capital gain is chargeable to income tax.
- In the cases, where the gross total income includes such Long-term capital gains, deduction under Chapter VI-A should be allowed for the gross total income as reduced by such capital gains. Also, rebate under section 87A (available for resident investors) should be allowed from the income-tax on the total income as reduced by tax payable on such capital gains except long term capital gain under section 112A of the Income Tax Act, 1961.
- In case of resident individuals, if section 115BAC is not opted, a rebate of up to Rs. 12,500 is available if total income does not exceed Rs. 500,000.
- The Finance Act, 2025 has amended Section 87A of the Act to provide that where an Individual apply for lower slab rates provided under section 115BAC(1A) and the total income:
  - i. does not exceed 12,00,000, a rebate shall be provided on tax to the extent of an amount equal to 100% of such income-tax or an amount of INR 60,000 (whichever is less);

<sup>1</sup> As per Notification No. 9/2014 dated 22 January 2014, the Central Government has specified Foreign Portfolio Investors registered under the Securities and Exchange Board of India (Foreign Portfolio Investors) Regulations, 2014, as 'Foreign Institutional Investor' for the purposes of clause (a) of the Explanation to section 115AD of the Act.

- ii. exceeds INR 12,00,000 and the income-tax payable on such total income exceeds the amount by which the total income is in excess of 12,00,000, a rebate shall be provided on tax of an amount equal to the amount by which the tax payable is in excess of the amount by which the total income exceeds 12,00,000.
- Further, such rebate of income tax will not be available on tax on incomes chargeable to tax at special rates (for e.g.: capital gains u/s 111A, 112 etc.).

The following deductions are available on long term capital gains arising on the transfer of Mutual Fund units, if the sale proceeds are invested in eligible avenues:

Particulars	Section 54F	Section 54EE
Eligible persons	Individuals and HUFs	All assesses
Asset to be purchased to claim exemption	One residential house in India	"long-term specified asset" means a unit or units, issued before the 1st day of April 2019, of such fund as may be notified by the Central Government in this behalf.'
Time limit for purchase from date of sale of MF units	Purchase: 1 year backward/2 years forward & Construction: 3 years forward	6 months
Amount Exempted	Capital gains proportionate to the investment made from the sale proceeds (subject to other conditions of owning/ purchasing the residential house mentioned in the section)	Investment in the new asset or capital gain whichever is lower subject to maximum deduction of Rs. 50 Lakhs in a financial year. Further, such investment made during the financial year in which the original asset was transferred and in the subsequent financial year does not exceed Rs.50 lakhs
Lock-in period	3 years	3 years from sale of transfer of original asset
Maximum deduction	INR 10 crores	INR 50 lakhs

#### Capital gains - In the case of specified mutual funds\*

Tax Status of Investor	Capital Gains Tax	
	Short Term	Long Term
Resident Individual/HUF	At the applicable slab rate**	NA
AOP/BOI		
Domestic Companies/Firms	15%/22%/ 25%/ 30%^	
NRI <sup>2</sup>	At the applicable slab rate**	NA
FII <sup>2</sup>	30%	

\*\*Kindly refer to the tabulated slab rate chart mentioned above.

^ A tax rate of 25% (plus applicable surcharge and health and education cess) is applicable for the financial year 2025-26 in the case of domestic companies having total turnover or gross receipts not exceeding Rs. 400 crores in the financial year 2023-24. Domestic companies may opt for a lower tax rate of 22% (plus fixed surcharge at the rate of 10% and health and education cess) (as per section 115BAA of the Act), subject to fulfillment of prescribed conditions. Further, new domestic manufacturing companies may opt for a lower tax rate of 15% (plus fixed surcharge at the rate of 10% and health and education cess) (as per section 115BAB of the Act), subject to fulfillment of prescribed conditions.

<sup>2</sup> As per Notification No. 9/2014 dated 22 January 2014, the Central Government has specified Foreign Portfolio Investors registered under the Securities and Exchange Board of India (Foreign Portfolio Investors) Regulations, 2014, as 'Foreign Institutional Investor' for the purposes of clause (a) of the Explanation to section 115AD of the Act.

### **Notes:**

As per section 50AA of the Act, “specified mutual fund” means (a) a Mutual Fund by whatever name called, which invests more than sixty-five per cent of its total proceeds in debt and money market instruments; or (b) a fund which invests sixty-five per cent or more of its total proceeds in units of a fund referred to in sub-clause (a).”

- Provided that the percentage of investment in debt and money market instruments or in units of a fund, as the case may be, in respect of the Specified Mutual Fund, shall be computed with reference to the annual average of the daily closing figures.
- Provided further that for the purposes of this clause, “debt and money market instruments” shall include any securities, by whatever name called, classified or regulated as debt and money market instruments by the Securities and Exchange Board of India.’.
- The above definition of “specified mutual fund” will be effective from 01 April 2025.
- In case where the taxable income as reduced by short term capital gains of a resident individual or HUF is below the taxable limit, the short term capital gain will be reduced to the extent of this shortfall and only the balance short term capital gain is chargeable to income tax.

### **Capital gains – In case of other mutual funds\***

Tax Status of Investor	Capital Gains Tax		Tax on Distributed Income under Dividend Option
	Short Term	Long Term	
Resident Individual/HUF	At the applicable slab rate**	12.5%	At the applicable slab rate
AOP/BOI			
Domestic Companies/Firms	15%/22%/ 25%/ 30%^		
NRIs	At the applicable slab rate**	12.5%	20%
FII <sup>3</sup>	30%		

#### **\*Other mutual funds:**

- Hybrid Fund (investing more than 35% in equity and less than 65% in debt and money market instruments)
- Gold ETFs/Bond ETF/Liquid ETF
- Fund Of Funds (Domestic) other than Fund of funds as defined under the “Equity Oriented Fund” definition under section 112A of the Act
- Fund Of Funds Investing Overseas

\*\* Kindly refer to the tabulated slab rate chart mentioned above ^ A tax rate of 25% (plus applicable surcharge and health and education cess) is applicable for the financial year 2025-26 in the case of domestic companies having total turnover or gross receipts not exceeding Rs. 400 crores in the financial year 2023-24. Domestic companies may opt for a lower tax rate of 22% (plus fixed surcharge at the rate of 10% and health and education cess) (as per section 115BAA of the Act), subject to fulfillment of prescribed conditions. Further, new domestic manufacturing companies may opt for a lower tax rate of 15% (plus fixed surcharge at the rate of 10% and health and education cess) (as per section 115BAB of the Act), subject to fulfillment of prescribed conditions

<sup>3</sup> As per Notification No. 9/2014 dated 22 January 2014, the Central Government has specified Foreign Portfolio Investors registered under the Securities and Exchange Board of India (Foreign Portfolio Investors) Regulations, 2014, as ‘Foreign Institutional Investor’ for the purposes of clause (a) of the Explanation to section 115AD of the Act.

**Notes:**

- The benefit of cost inflation index is not available while computing capital gains on transfer of long term capital asset.
- In cases where the taxable income, reduced by long term capital gains of a resident individual or HUF is below the taxable limit, the long term capital gain will be reduced to the extent of this shortfall and only the balance of the long term capital gain is chargeable to income tax. In case where the taxable income as reduced by short term capital gains of a resident individual or HUF is below the taxable limit, the short term capital gain will be reduced to the extent of this shortfall and only the balance short term capital gain is chargeable to income tax.
- In the cases, where the gross total income includes such Long-term capital gains, deduction under Chapter VI-A should be allowed for the gross total income as reduced by such capital gains. Also, rebate under section 87A (available for resident investors) should be allowed from the income-tax on the total income as reduced by tax payable on such capital gains except long term capital gain under section 112A of the Income Tax Act, 1961.
- In case of resident individuals, if section 115BAC is not opted, a rebate of up to Rs. 12,500 is available if total income does not exceed Rs. 500,000.
- The Finance Act, 2025 has amended Section 87A of the Act to provide that where an Individual apply for lower slab rates provided under section 115BAC(1A) and the total income:
  - does not exceed 12,00,000, a rebate shall be provided on tax to the extent of an amount equal to 100% of such income-tax or an amount of INR 60,000 (whichever is less);
  - exceeds INR 12,00,000 and the income-tax payable on such total income exceeds the amount by which the total income is in excess of 12,00,000, a rebate shall be provided on tax of an amount equal to the amount by which the tax payable is in excess of the amount by which the total income exceeds 12,00,000.

Further, such rebate of income tax will not be available on tax on incomes chargeable to tax at special rates (for e.g.: capital gains u/s 111A, 112 etc.)

- The following deductions are available on long term capital gains arising on the transfer of Mutual Fund units, if the sale proceeds are invested in eligible avenues:

Particulars	Section 54F	Section 54EE
Eligible persons	Individuals and HUFs	All assesses
Asset to be purchased to claim exemption	One residential house in India	“long-term specified asset” means a unit or units, issued before the 1st day of April 2019, of such fund as may be notified by the Central Government in this behalf.’
Time limit for purchase from date of sale of MF units	Purchase: 1 year backward/2 years forward & Construction: 3 years forward	6 months
Amount Exempted	Capital gains proportionate to the investment made from the sale proceeds (subject to other conditions of owning/purchasing the residential house mentioned in the section)	Investment in the new asset or capital gain whichever is lower subject to maximum deduction of Rs. 50 Lakhs in a financial year. Further, such investment made during the financial year in which the original asset was transferred and in the subsequent financial year does not exceed Rs.50 lakhs.
Lock-in period	3 years	3 years from sale of transfer of original asset
Maximum deduction*	INR 10 crores	INR 50 lakhs

### **Capital losses**

Losses under the head capital gains cannot be set off against income under any other head. Furthermore, within the head capital gains, losses arising from the transfer of long term capital assets cannot be adjusted against gains arising from the transfer of a short term capital asset. However, losses arising from the transfer of short term capital assets can be adjusted against gains arising from the transfer of either a long term or a short term capital asset.

Unabsorbed long term capital losses can be carried forward and set off against the long term capital gains arising in any of the subsequent eight assessment years. Unabsorbed short term capital losses can be carried forward and set off against the income under the head capital gains in any of the subsequent eight assessment years.

### **Consolidation/Merger of schemes**

In case of consolidation of mutual fund schemes, the investors generally receive units in the consolidated scheme in consideration of units held in the consolidating scheme. As per the Finance Act, 2015, the following provisions would apply from Assessment year 2016-17 and onwards in case of consolidation of mutual fund schemes.

As per section 47(xviii) of the Act, any transfer of units held by the investor in the consolidating scheme of the mutual fund in consideration of allotment of units in the consolidated scheme, shall not be regarded as a taxable transfer, provided that the consolidation is of two or more schemes of an equity oriented fund or two or more schemes of a fund other than equity oriented fund.

Further, as per section 49(2AD) of the Act, the cost of acquisition of units in the consolidating scheme shall be deemed to be the cost of acquisition of the units in the consolidated scheme. Also, as per section 2(42A) of the Act, the period of holding of the units in the consolidated scheme shall include the period of holding of the units in the consolidating scheme.

‘Consolidating scheme’ has been defined under section 47(xviii) of the Act as the scheme of a Mutual Fund which merges under the process of consolidation of the schemes of mutual fund in accordance with the SEBI (Mutual Funds) Regulations, 1996.

‘Consolidated scheme’ has been defined as the scheme with which the consolidating scheme merges or which is formed as a result of such merger.

### **Consolidation/Merger of plans**

The tax exemption, available on merger or consolidation of mutual fund schemes has been extended to the merger or consolidation of different plans in a mutual fund scheme.

For this purpose, Section 47 has been amended to provide that any transfer by a unit holder of a capital asset, being a unit or units, held by him in the consolidating plan of a mutual fund scheme, made in consideration of the allotment to him of a capital asset, being a unit or units, in the consolidated plan of that scheme of the mutual fund shall not be considered transfer for capital gain tax purposes and thereby shall not be chargeable to tax.

Further, sub-section (2AF) is inserted under section 49 of the Act to provide that the cost of acquisition of units in the consolidating plan of a scheme shall be deemed to be the cost of acquisition of the units in the consolidated plan. Also, section 2(42A) of the Act is amended, whereby the period of holding of the units in the consolidated plan of a scheme shall include the period of holding of the units in the consolidating plan of a scheme.

### **Minimum Alternative Tax/Alternate Minimum Tax**

The income on the transfer of Mutual Fund units by a company would be taken into account in computing the book profits and Minimum Alternative Tax (‘MAT’<sup>[5]</sup>), if any, under section 115JB of the Act.

Income of a foreign company in respect of capital gains on transactions in securities (as defined under Securities Contract Regulation Act), as well as corresponding expenses, are to be excluded while computing income under minimum alternate tax provisions, if tax payable thereon is less than 15% (plus surcharge and health and education cess).



The taxable income on transfer of Mutual Fund units would be taken into account in computing the Adjusted Total Income and Alternate Minimum Tax, if any, under section 115JC<sup>[6]</sup> of the Act.

An amendment has been made *vide* the Finance Act, 2016, to clarify that MAT provisions should not be applicable to a foreign company with retrospective effect from financial year 2001-2002, if:

- it is resident of a country with which India has a DTAA, and it does not have a permanent establishment in India, in accordance with the provisions of the relevant DTAA; or
- it is resident of a country with which India does not have a DTAA, and it is not required to seek registration under Indian corporate laws.

#### **Tax deduction at source on capital gains**

- **Resident unit holders:**

No income tax is required to be deducted at source from capital gains arising on transfer of units by resident unit holders.

- **Non-resident unit holders:**

The taxes shall be deducted at the below mentioned rates:

Sr. No.	Category of mutual fund scheme	Sub-category of mutual fund scheme	Listed/ Unlisted	Long term tax rate**	Short Term tax rate**
1	Equity Oriented Mutual Funds (Note 1)	Equity Mutual Fund	N/A	12.50%	20%
		Equity Fund of Funds	N/A	12.50%	20%
2	Specified Mutual Funds*	Debt Mutual Fund/ Conservative Hybrid Funds/ Money Market Funds etc.	Listed/ Unlisted	Applicable slab rates^	
3	Other Mutual Funds	Gold ETF Silver ETF & International ETFs, etc.)	Listed	12.50%	Applicable slab rates
			Unlisted	12.50%	Applicable slab rates

\*Kindly refer to the definition of “specified mutual fund” mentioned above

\*\* The tax rates tabulated above are excluding applicable surcharge and cess

^Kindly refer to the tabulated slab rate chart mentioned above

#### **Notes:**

- In case of ELSS, the units are subject to a lock-in period of 3 years. Accordingly, any sale of units after this lock-in period will qualify as a long-term capital gain.
- Tax is required to be deducted at source under section 195 of the Act, on payment to a non-resident of any sum chargeable under the provisions of the Act, at the applicable rates. A non-resident, eligible to claim treaty benefits, would be governed by the provisions of the Act to the extent that they are more beneficial than the DTAA. Accordingly, tax should be withheld as per the provisions of the Act or the provisions in the DTAA, whichever is more beneficial to the assessee, subject to certain conditions. However, the unit holder will be required to provide appropriate documents to the Fund, in order to be entitled to a beneficial rate under the relevant DTAA.

As per section 90(4) of the Act, a non-resident shall not be entitled to claim treaty benefits, unless the non-resident obtains a Tax Residency Certificate (‘TRC’) of being a resident of his home country. Furthermore, as per section 90(5) of the Act, a non-resident is also required to provide other information in the prescribed Form No. 10F.

- Under section 196B of the Act (i.e. in case of units of an equity oriented fund and other mutual funds purchased in foreign currency as per the provisions of section 115AB of the Act), tax shall be deducted at source from long term capital gains @ 12.5% plus applicable surcharge and health and education cess.

#### **Foreign Institutional Investors**

As per the provisions of section 196D of the Act, no deduction of tax shall be made from any income from capital gains arising from the transfer of securities referred to in section 115AD, payable to a FII<sup>[7]</sup>.

#### **Deduction of tax at source on payment of certain sum for purchase of goods**

Section 194Q of the Act provides that a buyer who is responsible for paying any sum to any resident seller for purchase of any goods of the value or aggregate of such value exceeding INR 50 lakhs in any previous year, shall, at the time of credit of such sum to the account of the seller or at the time of payment thereof by any mode, whichever is earlier, deduct an amount equal to 0.1% of such sum exceeding INR 50 lakhs as income-tax.

For the purpose of this clause, the term "buyer" means a person whose total sales, gross receipts or turnover from the business carried on by him exceed INR 10 crore during the financial year immediately preceding the financial year in which the purchase of goods is carried out, not being a person, as the Central Government may, by notification in the Official Gazette, specify for this purpose, subject to such conditions as may be specified therein.

The section further provides that if any sum is credited to any account, whether called "suspense account" or by any other name, in the books of the buyer liable to pay such income, such credit of income shall be deemed to be the credit of such income to the account of the payee (i.e. seller) and the provisions of this section shall apply accordingly.

The provisions of this section shall not apply to a transaction on which—

- (a) tax is deductible under any of the provisions of this Act; and
- (b) tax is collectible under the provisions of section 206C of the Act.

#### **Tax deducted on benefit or perquisites in respect of business and profession:**

Section 194R of the Act, requiring deduction of tax in respect of any benefit or perquisite provided to a resident, where the benefit is arising from a business or exercise of profession by such resident.

The tax has to be deducted in respect of such benefit at the rate of 10% of the value or aggregate of value of such benefit. The provision is applicable where the value or aggregate of value of benefit given to a resident during the financial year exceeds INR 20,000.

#### **Failure to provide Permanent Account Number (PAN)**

Section 206AA of the Act states that the deductee is required to furnish his PAN to the deductor failing which the deductor shall deduct tax at source at the higher of the following rates:

1. The rate prescribed in the Act;
2. The rate in force; or
3. The rate of 20%.

As per an amendment *vide* the Finance Act, 2016 the provisions of section 206AA shall not apply to a non-resident, not being a company, or to a foreign company, in respect of any specified payment. This is, however, subject to the conditions prescribed in rule 37BC of the Income-tax Rules, 1962. As per the said Rule, the provisions of section 206AA should not apply, *inter alia*, on payment of dividend and capital gains where the non-resident deductee furnishes following details and documents:

- i. Name, e-mail id, contact number;
- ii. Address in the country of residence;
- iii. Tax Residency Certificate (TRC), if the law of country of residence provides for such certificate;
- iv. Tax Identification Number (TIN) in the country of residence.

Where TIN is not available, a unique identification number is required to be furnished through which the deductee is identified in the country of residence.

The Finance Act 2021 has amended the provisions of Section 206AA to provide that where the tax is required to be withheld under Section 194Q of the Act and PAN is not provided, the rate of tax shall be 5% instead of 0.1%.

Section 206CC of the Act states that any person paying any sum or amount, on which tax is collectible at source shall furnish his Permanent Account Number to the person responsible for collecting such tax (herein referred to as collector), failing which tax shall be collected at the higher of the following rates, namely:—

- (i) at twice the rate specified in the relevant provision of this Act; or
- (ii) at the rate of five per cent.

The rate of TCS under section 206CC shall not exceed 20% [\[8\]](#)

However, the provisions of this section shall not apply to a non-resident who does not have permanent establishment in India.

#### **Dividend stripping**

As per section 94(7) of the Act, loss arising on sale of units which are bought within 3 months of the record date and sold within 9 months after the record date, shall be ignored for the purpose of computing income chargeable to tax to the extent of exempted income received or receivable on such units.

In the Finance Act, 2022 the said provision is applicable to securities as well and the definition of unit has also been modified, so as to include units of business trusts and AIF, within the definition of units.

#### **Bonus stripping**

As per section 94(8) of the Act, units purchased within a period of 3 months prior to record date of entitlement of bonus and sold within a period of 9 months after such date, the loss arising on the transfer of original units shall be ignored for the purpose of computing the income chargeable to tax.

The amount of loss ignored shall be deemed to be the cost of purchase / acquisition of the bonus units.

In the Finance Act, 2022, sub-section 8 of the section 94 has modified the definition of unit, so as to include units of business trusts and AIF, within the definition of units.

#### **Religious and Charitable Trust**

Investments in units of the Mutual Fund will rank as an eligible form of investment under section 11(5) of the Act read with Rule 17C of the Income-tax Rules, 1962 for Religious and Charitable Trusts.

#### **New pension scheme:**

Any income, including gains from redemption of Mutual Fund units, received by any person for, or on behalf of, the New Pension System Trust (as established under the provisions of Indian Trust Act, 1882, on 27 February, 2008), is exempt in the hands of such person under section 10(44) of the Act.

STT is not leviable in respect of taxable securities transactions entered into by any person for, or on behalf of, the New Pension System Trust referred to in section 10(44) of the Act.

#### **Deemed Income**

Under section 56(2)(x), receipt of shares and securities without consideration or without adequate consideration, the difference (if exceeding fifty thousand rupees) between the aggregate FMV and such consideration is taxable as income in the hands of any person being recipient of such shares and securities.

Further the above provision of section 56(2)(x) shall not apply to any units/shares received by the donee:

- (i) From any relative; or
- (ii) On the occasion of the marriage of the individual; or
- (iii) Under a will or by way of inheritance; or
- (iv) In contemplation of death of the payer or donor, as the case may be; or
- (v) From any local authority as defined in the Explanation to clause (20) of section 10 of the Act; or
- (vi) From any fund or foundation or university or other educational institution or hospital or other medical institution or any trust or institution referred to in clause (23C) of section 10 of the Act; or
- (vii) From any trust or institution registered under section 12AA of the Act.
- (viii) Transaction not regarded as transfer under clause (i), (vi), (via), (viaa), (vib), (vic), (vica), (vicb), (vid), (vii) of section 47.
- (ix) From an individual by a trust created or established solely for the benefit of relative of the individual.

The term 'relative' shall mean:

- A] In the case of an Individual -
  - (i) The spouse of the individual
  - (ii) The brother or sister of the individual
  - (iii) The brother or sister of the spouse of the individual
  - (iv) The brother or sister of either of the parents of the individual
  - (v) Any lineal ascendant or descendant of the individual
  - (vi) Any lineal ascendant or descendant of the spouse of the individual
  - (vii) The spouse of the person referred to in clauses (ii) to (vi), and B] In case of a HUF, any member thereof.

<sup>1</sup> As per Notification No. 9/2014 dated 22 January 2014, the Central Government has specified Foreign Portfolio Investors registered under the Securities and Exchange Board of India (Foreign Portfolio Investors) Regulations, 2014, as 'Foreign Institutional Investor' for the purposes of clause (a) of the Explanation to section 115AD of the Act.

<sup>[2]</sup> As per Notification No. 9/2014 dated 22 January 2014, the Central Government has specified Foreign Portfolio Investors registered under the Securities and Exchange Board of India (Foreign Portfolio Investors) Regulations, 2014, as 'Foreign Institutional Investor' for the purposes of clause (a) of the Explanation to section 115AD of the Act

<sup>[3]</sup> As per Notification No. 9/2014 dated 22 January 2014, the Central Government has specified Foreign Portfolio Investors registered

under the Securities and Exchange Board of India (Foreign Portfolio Investors) Regulations, 2014, as 'Foreign Institutional Investor' for the purposes of clause (a) of the Explanation to section 115AD of the Act

<sup>[4]</sup> As per Notification No. 9/2014 dated 22 January 2014, the Central Government has specified Foreign Portfolio Investors registered under the Securities and Exchange Board of India (Foreign Portfolio Investors) Regulations, 2014, as 'Foreign Institutional Investor' for the purposes of clause (a) of the Explanation to section 115AD of the Act

<sup>[5]</sup> MAT should not apply in case of domestic companies exercising option under section 115BAA and section 115BAB of the Act.

<sup>[6]</sup> Section 115JC is applicable to all persons other than company which has claimed any deduction under Chapter VI-A under the heading 'C- Deductions in respect of certain incomes' (other than section 80P) or section 10AA.

<sup>[7]</sup> As per Notification No. 9/2014 dated 22 January 2014, the Central Government has specified Foreign Portfolio Investors registered under the Securities and Exchange Board of India (Foreign Portfolio Investors) Regulations, 2014, as 'Foreign Institutional Investor' for the purposes of clause (a) of the Explanation to section 115AD of the Act.

<sup>[8]</sup> As amended by Finance Act 2023 w.e.f. 1 July 2023.

## **B. Legal Information**

### **Requirements under Prevention of Money Laundering Act, 2002**

In terms of the Prevention of Money Laundering Act 2002 (“**PMLA**”), the Rules issued thereunder, and the guidelines/circulars issued by the Securities and Exchange Board of India (‘SEBI’) and Association of Mutual Funds in India (‘AMFI’) regarding Anti Money Laundering (‘AML Laws’), all intermediaries, including Mutual Funds, have to verify and maintain records of all its investors through the mandated Know Your Customer (‘KYC’) process with effect from February 01, 2008.

The AMC shall comply with the provisions notified under the PMLA Act and the circulars issued by SEBI and AMFI from time to time.

The Investor(s) should ensure that the amount invested in the Scheme is through legitimate sources only and does not involve and is not designated for the purpose of any contravention or evasion of the provisions of the Income Tax Act, Prevention of Money Laundering Act (PMLA), Prevention of Corruption Act and/or any other applicable law in force and also any laws enacted by the Government of India from time to time or any rules, regulations, notifications or directions issued thereunder.

To ensure appropriate identification of the Investor(s) and with a view to monitor transactions for the prevention of money laundering, the AMC/Fund reserves the right to seek information, record investor's telephonic calls and / or obtain and retain documentation for establishing the identity of the Investor(s), their beneficial ownership, proof of residence, source of funds, etc. It may re-verify identity and obtain any incomplete or additional information for this purpose.

The Fund, AMC, Trustee and their Directors, employees and agents shall not be liable in any manner for any claims arising whatsoever on account of freezing the folios/rejection of any application/allotment of Units or mandatory redemption of Units due to non-compliance with the provisions of the PMLA, SEBI/AMFI circular(s) and KYC policy and/or where the AMC believes that transaction is suspicious in nature within the purview of the PMLA and SEBI/AMFI circular(s) and reporting the same to FIU-IND.

### **Nomination Facility**

The SEBI (Mutual Funds) Regulations, 1996, notifies that the mutual fund shall provide for nomination facility to the unit holders to nominate a person in whose favour the units shall be transmitted in the event of death of the unit holder. In accordance with the same, the AMC provides for the nomination facility as permitted under the Regulations. Nomination Forms are available along with the application forms at any of the Investor Service Centers and on the website of the AMC at <https://www.abakkusmf.com/>. It may, however, be noted that in the event of death of the Unitholder and in the event a nominee has been named, the nominee shall stand transposed in respect of the Units held by the Unitholder. Such nominee (new unit holder) will hold the Units in trust for and on behalf of the estate of the original Unitholder and his/her legal heirs. All payments and settlements made to such nominee shall be a full and valid discharge of obligation by the AMC/Mutual Fund/Trustee Company.

1. Nomination shall be maintained at folio level and shall be applicable for investment under all schemes in the folio.
2. Where a folio has joint holders, all joint holders can sign the request for nomination/cancellation of nomination as per mode of operations mentioned in the folio. Nomination form/section cannot be signed by Power of attorney (PoA) holders.
3. Every new nomination for a folio/account will overwrite the existing nomination.
4. Nomination will not be allowed in a folio held on behalf of a minor.
5. A minor can be nominated and, in that event, the name, relationship and address of the guardian of the minor nominee shall be provided by the unit holder. Guardian of the minor should either be a natural guardian (i.e.

father or mother) or a court appointed legal guardian. Nomination can also be in favour of the Central Government, State Government, a local authority, any person designated by virtue of his office or a religious or charitable trust.

6. The Nominee shall not be a trust (other than a religious or charitable trust), society, body corporate, partnership firm, Karta of Hindu Undivided Family or a Power of Attorney holder. A non-resident Indian can be a Nominee subject to the exchange controls in force, from time to time.
7. Nomination in respect of the units stands withdrawn upon the transfer of units.
8. Transfer of units in favour of a Nominee shall be valid discharge by the Asset Management Company (AMC) against the legal heir.
9. On cancellation of the nomination, the nomination shall stand withdrawn, and the AMC shall not be under any obligation to transfer the units in favour of such Nominee.
  - The AMC shall have the right to ask for any additional information/documentation as it may deem necessary to satisfy itself as to the identity of the Nominee/Claimant including but not limited to procuring an Indemnity Bond.
  - Where the units are held by more than one person jointly, the joint unit holders may together nominate a person in whom all the rights in the units shall vest in the event of death of all the joint unit holders. Investors who want to make multiple nominations should give a separate request in the Form as prescribed by the AMC.
  - Nomination can be made for maximum number of three nominees. In case of multiple nominees, the percentage of allocation/ share in whole numbers and without decimals in favour of each of the nominees should be indicated against the name of the nominees. Such allocation/share should total to 100 percent.
  - In the event of the Unit holder(s) fail to indicate the percentage of allocation/share for each of the nominees, the Fund/ AMC, by invoking default option shall settle the claim equally amongst all the nominees.
  - In case of multiple nominees, on the death of one or more nominee, the transmission of units shall be made pro-rata to the surviving nominees.
  - As per SEBI Master Circular for Mutual Funds dated June 27, 2024, Investors subscribing to mutual fund units shall have choice of providing nomination as per the prescribed format or opting out of nomination through a signed declaration.
  - The folios of all existing individual unitholders holding units solely or joint mode that have not complied with the above requirement were supposed to be frozen for debits with effect from June 30, 2024.
  - However, pursuant to SEBI Circular No. SEBI/HO/MIRSD/POD-1/P/CIR/2024/81 dated June 10, 2024, non-submission of 'choice of nomination' shall not result in freezing of mutual fund folios. All new investors/unitholders shall continue to be required to mandatorily provide the 'Choice of Nomination' for Mutual Fund Folios (except for jointly held Mutual Fund Folios).
  - All existing investors/Unitholders are encouraged, in their own interest, to provide 'choice of nomination' for ensuring smooth transmission of securities held by them as well as to prevent accumulation of unclaimed assets in securities market.
  - AMC shall provide an option to the unit holder(s) to submit either the nomination form or the declaration form for opting out of nomination in physical or online as per the choice of the unit holder(s).
  - In case of physical option, the forms shall carry the wet signature of all the unit holder(s).
  - In case of online option, instead of wet signature(s) of all the unit holder(s), AMCs shall validate the forms:
    - i. using e-Sign facility recognized under Information Technology Act, 2000; or
    - ii. through two factor authentication (2FA) in which one of the factor shall be a One-Time Password sent to the unit holder at his/her email/phone number registered with the AMC. AMC to ensure adequate systems in place for providing e-Sign facility and take all necessary steps to maintain confidentiality and safety of client records.

SEBI vide its circular no. SEBI/HO/OIAE/OIAE\_IAD-3/P/ON/2025/0027 dated February 28, 2025 mandated implementation of the following clauses relating to nomination with effect from June 01, 2025:

- (1) Name, percentage of share, relationship, address, email, mobile number and identity number are mandatory for each of the nominee.
- (2) Date of Birth to be provided only if the nominee is minor and Guardian name is optional.

- (3) Any one of the Identity numbers (PAN, Driving License number, Last 4 digits of Aadhar, passport number) to be provided for nominee.

### **Process for Investments made in the name of a Minor through a Guardian**

As per Paragraph 17.6 of SEBI Master Circular dated June 27, 2024 and SEBI/HO/IMD/PODII/CIR/P/2023/0069 dated May 12, 2023 with respect to investment made in the name of minor through a guardian:

- a) Payment for investment by means of Cheque, Demand Draft or any other 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 only. For existing folios, the AMCs shall insist upon a Change of Pay-out Bank mandate before redemption is processed
- b) Upon the minor attaining the status of major, the minor in whose name the investment was made, shall be required to provide all KYC details, updated bank account details including cancelled original cheque leaf of the new account. No further transactions shall be allowed till the status of the minor is changed to major.

### **KYC Requirements**

In terms of the PML Act, 2002, the Rules issued there under, and the guidelines/circulars issued by SEBI regarding the Anti Money Laundering (AML Laws) from time to time, all intermediaries, including Mutual Funds, have to formulate and implement a client identification programme, verify and maintain the record of identity and address(es) of investors. In order to bring about uniformity in the Know Your Customer (KYC) process in the securities market, Common KYC Application form and supporting documents shall be used by all SEBI registered intermediaries viz. Mutual Funds, Portfolio Managers, Depository Participants, Stockbrokers, Venture Capital Funds, Collective Investors Schemes, etc. Further, to avoid duplication of KYC process across SEBI registered intermediaries, a mechanism for centralization of the KYC records in the securities market has been developed. Accordingly, we will be performing the initial KYC of our clients and upload the details on the system of the KYC Registration Agency (KRA). The data from the KRA shall be checked and passed onto the Central Registry of Securitization Asset Reconstruction and Security Interest (CERSAI) for generation of the KYC Identification number (KIN) of the investor. The KYC details of the client can be accessed by other intermediaries by accessing the KRA system. As a result, once the client has done KYC with a SEBI registered intermediary, he need not undergo the same process again with the Fund provided the KYC has been done with Aadhaar as the Proof of Identity. In case the KYC is done with any other Officially Valid Document as proof of Identity, the investor would need to undergo the KYC every time they invest with a new SEBI registered intermediary i.e. AMC. However, the Fund reserves the right to carry out fresh KYC of the investor in its discretion. For regulating KRAs, SEBI has formulated the KYC Registration Agency (KRA) Regulations, 2011 which covers the registration of KRAs, functions and responsibilities of the KRAs and intermediaries, code of conduct, data security, etc. In-Person' Verification (IPV) of clients has been made mandatory for all SEBI registered intermediaries. Asset Management Companies (AMCs) and the distributors who comply with the certification process of National Institute of Securities Market (NISM) or Association of Mutual Funds in India (AMFI) and have undergone the process of 'Know Your Distributor (KYD)' can perform the IPV for mutual fund investors. Additionally, entities registered as Category 1 Execution Only Platform (EOP) can perform the IPV. However, where applications are received by the mutual funds directly from the clients (i.e. not through any distributor), the IPV performed by the scheduled commercial banks can be relied on. The IPV carried out by any SEBI registered intermediary can be relied upon. For details regarding 'How to apply for KYC?' and 'Who are required to be KYC compliant?', please refer the FAQ section. For Units held in physical (non-Demat) form Investors should note that it is mandatory for all transactions(s) viz.

- (i) Purchases;
- (ii) Switches;
- (iii) Registrations for Systematic Investments viz. Systematic Investment Plan (SIP), Systematic Transfer Plan (STP), Flex STP, Flex index/Swing STP Plan, Transfer of IDCW Plan (TIP), etc.; irrespective of the amount of investment to be KYC Compliant;



(iv) Redemptions. Investors should quote the valid KYC Compliance Status and attach proof of KYC Compliance viz. KYC Acknowledgement Letter/Printout of KYC Compliance Status downloaded from the website <https://www.karvykra.com>/<https://www.cvlkra.com>/<https://kra.ndml.in>/<https://www.camskra.com>/<https://www.nsekra.com> using the PAN.

- In the event of noncompliance of KYC requirements, the Trustee/ AMC reserves the right to freeze the folio of the investor(s) and refund the investment amount in case of fresh purchase. All investors (both individual and non-individual) can apply for KYC compliance.
- However, applicants should note that minors cannot apply for KYC compliance and any investment in the name of minors should be through a Guardian, who should be KYC compliant for the purpose of investing with a Mutual Fund. Also, applicants/Unitholders intending to apply for Units/ currently holding Units and operating their Mutual Fund folios through a Power of Attorney (PoA) must ensure that the issuer of the PoA and the holder of the PoA must mention their KYC compliance status at the time of investment.
- PoA holders are not permitted to apply for KYC compliance on behalf of the issuer of the PoA. Separate procedures are prescribed for change in name, address and other KYC related details, should the applicant desire to change such information.

### **Operationalisation of Central KYC Records Registry (CKYCR)**

Central Registry of Securitisation and Asset Reconstruction and Security interest of India ('CERSAI') has been authorized by Government of India to act as Central KYC Records Registry under Prevention of Money-Laundering (Maintenance of Records) Rules, 2005 ('PMLA Rules').

SEBI vide its circular no. CIR/MIRSD/66/2016 dated July 21, 2016 and circular no. CIR/MIRSD/120/2016 dated November 10, 2016 has prescribed that the Mutual Fund/AMC should capture KYC information for sharing with CKYCR as per the KYC template prescribed by CERSAI for uniform and smooth implementation of CKYC norms for on boarding of new investors in Mutual Funds with effect from February 1, 2017.

In accordance with the aforesaid SEBI circulars and AMFI best practice guidelines for implementation of CKYC norms with effect from February 1, 2017:

- a) investors who have never done KYC process under KRA regime i.e. a new investor who is new to KRA system and whose KYC is not registered or verified in the KRA system shall be required to provide KYC details in the CKYC Form to the Mutual Fund/ AMC.
- b) investor who fills old KRA KYC Form, should provide additional / missing information using Supplementary KYC Form or fill CKYC Form. The said form is available on Abakus Mutual Fund website (<https://www.abakkusmf.com/>)
- c) Details of investors shall be uploaded on the system of CKYCR and a 14-digit unique KYC identifier ('KIN') will be generated for such customer.
- d) new investors, who have completed CKYC process & have obtained KIN may quote their KIN in the application form instead of submitting CKYC Form/Supplementary KYC Form.
- e) AMC/Mutual Fund shall use the KIN of the investor to download the KYC information from CKYCR system and update its records.
- f) If the PAN of investor is not updated on CKYCR system, the investor should submit self-certified copy of PAN card to the Mutual Fund/AMC.

The AMC reserves the right to reject transaction application in case the investor(s) fails to submit information and/or documentation as mentioned above. In the event of non-compliance of KYC requirements, the Trustee / AMC reserves the right to freeze the folio of the investor(s).

**Financial transactions (including redemptions, switches and all types of systematic plans) and non-financial requests will not be processed if the Unitholders have not completed KYC requirements**

Unitholders are advised to use the applicable KYC Form for completing the KYC requirements and submit the form at the point of acceptance. Further in case your PAN is not updated in our records, upon updation of KYC details with the KRA (KRA-KYC)/ CERSAI (CKYC), the unit holders are requested to intimate us/our Registrar and Transfer Agent their PAN information along with the folio details for updation in our records. For applicants who subscribe to the Units through Stock Exchange facility, the KYC performed by the Depository Participant of the applicants will be considered as KYC verification done by the Trustee/AMC. Units held in Electronic (Demat) mode For Units held in Demat form, the KYC performed by the Depository Participant of the applicants will be considered as KYC verification done by the Trustee/AMC.

### **Prevention of Money Laundering Act Requirements (PML Requirements)**

Prevention of Money Laundering Act, 2002 (hereinafter referred to as “PML Act”) came into effect from July 1, 2005 vide Notification No. GSR 436(E) dated July 1, 2005 issued by Department of Revenue, Ministry of Finance, Government of India. SEBI vide Circular No. SEBI/HO/MIRSD/MIRSDSECFATF/P/CIR/2024/78 dated June 6, 2024 issued a ‘Master Circular on Anti Money Laundering (AML) Standards/with and Combating the Financing of Terrorism (CFT)/Obligations of Securities Market Intermediaries under the Prevention of Money Laundering Act, 2002’ and before “and rules framed thereunder” all intermediaries are advised to take necessary steps to ensure compliance with the requirement of the PML Act inter-alia for the maintenance and preservation of records and reporting of information relating to suspicious transactions to Financial Intelligence Unit-India (FIU-IND), New Delhi. The investor(s) should ensure that the amount invested in the schemes of the Mutual Fund is through legitimate sources only and does not involve and is not designated for the purpose of any contravention or evasion of the provisions of the Income Tax Act, Prevention of Money Laundering Act, Prevention of Corruption Act and/or any other laws in force in India from time to time or any rules, regulations, notifications or directions issued thereunder. To ensure appropriate identification of the investor(s)/Unitholder(s) under the KYC policy and with a view to monitor transactions for the prevention of money laundering, the AMC/the Mutual Fund reserves the right to seek information, record investor’s/Unitholder’s telephonic calls and/or obtain and retain documentation for establishing the identity of the investor/Unitholder, their beneficial owner(s), proof of residence, source of funds, etc. It may re-verify identity and obtain any incomplete or additional information for this purpose as the case may be. The investor(s)/Unitholder(s) shall provide such documents to the satisfaction of the AMC as may be required from time to time for the verification/identification of the investor(s)/Unitholder(s)/any transaction by the AMC/ Mutual Fund. If the investor(s)/Unitholder(s) refuses/fails to provide to the AMC, the required documents/information within the period specified, the AMC, shall have the sole and absolute discretion to freeze the folio(s) of the investor(s)/Unitholder(s), reject any application(s)/allotment of Units and report the details of such investor/Unitholder/transaction to appropriate authority. Abakkus Mutual Fund, Abakkus Investment Managers Private Limited, Abakkus Trustee Private Limited and their Directors, employees and agents/or shall not be liable in any manner for any claims arising whatsoever on account of such freezing of folio(s)/rejection of any application/allotment of Units redemption of Units and transfer of proceeds to authorities and/or reporting the same to appropriate authorities and/or reporting the same to appropriate authorities.

### **Transfer and Transmission of Units**

#### **a) Transfer Facility**

- Units of the schemes shall be non-transferable. However, 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.
- In case units are held in a single name by a unit holder, units shall be transmitted in favour of the nominee, where the unit holder has appointed a nominee, upon production of death certificate or any other document to the satisfaction of the Mutual Fund, AMC/Trustee or Registrar.
- If the unit holder has not appointed a nominee, the units shall be transmitted in favour of the unit holder’s executor/ administrator of estate/legal heir(s), as the case may be, on production of death certificate or any other document to the satisfaction of the Mutual Fund, AMC/Trustee or Registrar.

- In case units are held by more than one registered unit holder, then upon death of first unitholder, units shall be transmitted in favour of the second named holder on production of a death certificate or any other document to the satisfaction of the Mutual Fund, AMC/Trustee or Registrar.
- The rights in the units will vest in the nominee upon the death of all joint unit holders upon the nominee producing a death certificate or any other document to the satisfaction of the Mutual Fund, AMC/Trustee or Registrar.

As per the AMFI Best Practices Guidelines Circular No.116 /2024-25 dated August 14, 2024, on 'Standard Process for Transfer of Units held in Non-Demat (SoA) mode', units held by individual unitholders in Non- Demat ('SoA') mode can be transferred only in following cases-

- (a) Surviving joint unitholder, who wants to add new joint holder(s) in the folio upon demise of one or more joint unitholder(s).
- (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.
- (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).

Partial transfer of units held in a folio shall be allowed.

If the request for transfer of units is lodged on the record date, the IDCW payout/ reinvestment shall be made to the transferor.

Redemption of the transferred units shall not be allowed for 10 days from the date of transfer. This will enable the investor to revert in case the transfer is initiated fraudulently.

#### **Mode of submitting/accepting the Transfer Request Non-Demat (SOA) mode:**

The facility for transfer of units held in SoA mode shall be available only through online mode via the transaction portals of the RTAs and the MF Central, i.e., the transfer of units held in SoA mode shall not be allowed through physical/paper-based mode or via the stock exchange platforms, MFU, channel partners and EOPs etc.

#### **b) Transmission Facility**

- (i) In case of transmission of Units, the transferee will have to comply with the applicable "Know Your Customer" Norms.

The AMC has implemented image based processing wherever the claimant is a nominee or a joint holder in the investor folio.

- (ii) In case of transmission of Units, the claimant(s) of Units will be required to submit the common Transmission Request Form (common fields) and NOC form and the prescribed documents as listed in SEBI Circular Reference No. SEBI/HO/OIAE/OIAE IAD-3/P/ON/2025/01650 dated January 10, 2025 and amendments issued vide SEBI circular dated February 28, 2025

- a) Self-attested copy of Death Certificate of the deceased investor,
- b) due completion, updating or reaffirming of the KYC of nominee(s) due discharge from the creditors if there are subsisting credit facilities secured by a duly created pledge and as may be applicable. The transferee may refer to our website (<https://abakkusmf.com>) or contact any of our investor service centers for the various documents required under different transmission scenarios.
- (iii) No claims in respect of such transmission shall subsist against the AMC and any claim or contestation shall be only amongst the nominee(s) and the claimants without reference to the AMC.

For transmission of units the Applicants/Claimants shall be required to submit the prescribed documents under various situations as stipulated below: -

1. DELETION OF NAMES OF THE DECEASED UNIT HOLDERS IN CASE OF DEATH OF 2ND AND/OR 3RD HOLDER: Request Form (Form T1)
2. TRANSMISSION OF UNITS TO SURVIVING UNIT HOLDER(S) IN CASE OF DEATH OF THE 1ST HOLDER: Transmission Request Form (Form T2)
3. TRANSMISSION OF UNITS TO THE REGISTERED NOMINEE/S IN CASE OF DEATH OF SOLE OR ALL UNITHOLDERS: Transmission Request Form (Form T3)
4. TRANSMISSION OF UNITS TO THE CLAIMANT/S ON DEATH OF SOLE UNITHOLDER OR ALL UNITHOLDERS, WHERE THERE IS NO NOMINATION REGISTERED: Transmission Request Form (Form T3)
5. CHANGE OF KARTA UPON DEATH OF THE KARTA OF HINDU UNDIVIDED FAMILY (HUF): Request Form (Form T4)
6. TRANSMISSION OF UNITS TO THE CLAIMANT/S UPON DEATH OF THE KARTA OF HUF, WHERE THERE IS NO SURVIVING CO-PARCENER OR THE HUF HAS BEEN DISSOLVED/PARTITIONED AFTER DEMISE OF THE KARTA: Transmission Request Form (Form T5)

Depending upon appropriateness, the AMC may consider seeking additional/alternative documents for necessary diligence of each case before transmitting the units in favour of the claimant/s. In case of transmission of units, the investors are requested to visit the nearest branch of the AMC or RTA for specified format of documents required to be submitted.

### **Suspension of Sale and Redemption of Units**

Suspension or restriction of repurchase/redemption facility under any scheme of the mutual fund shall be made applicable only after obtaining the approval from the Boards of Directors of the AMC and the Trustees. Additionally, the following requirements would be undertaken before imposing restriction on redemptions:

- i. Restriction may be imposed when there are circumstances leading to a systemic crisis or event that severely constricts market liquidity or the efficient functioning of markets such as:
  - Liquidity issues - when market at large becomes illiquid affecting almost all securities rather than any issuer specific security.
  - 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.
  - 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.
- ii. Restriction on redemption may be imposed for a specified period of time not exceeding 10 working days in any 90 days period.
- iii. Any imposition of restriction would require specific approval of Board of AMC and Trustees and the same should be informed to SEBI immediately.
- iv. When restriction on redemption is imposed, the following procedure shall be applied: - No redemption requests up to Rs. 2 lakh shall be subject to such restriction. - Where redemption requests are above Rs. 2 lakh, the AMC shall redeem the first Rs. 2 lakh without such restriction and remaining part over and above Rs. 2 lakh shall be subject to such restriction.

### **Right to Limit Redemptions**

Any Units, which by virtue of these limitations are not redeemed on a particular Business Day, will be carried forward for Redemption to the next Business Day, in order of receipt. Redemptions so carried forward will be priced on the basis of the Applicable NAV (subject to the prevailing load) of the Business Day on which Redemption is made. 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 pro-rata basis, based on the size of each Redemption request, the balance amount being carried forward for Redemption to the next Business Day(s). Suspension or restriction of repurchase/redemption facility under any scheme of the mutual fund shall be made applicable only after obtaining the approval from the Boards of Directors of the AMC and the Trustees. After obtaining the approval from the AMC Board and the Trustees, an intimation would be sent to SEBI in advance providing details of circumstances and justification for the proposed action shall also be informed.

## **Duration of the Scheme and Winding Up**

### **A. Duration of the Scheme**

An Open-ended / Interval Scheme has a perpetual life. However, in terms of SEBI (MF) regulations, the Scheme(s) may be wound up as provided in (B) below.

### **Procedure of winding up**

- i. A scheme of the Mutual Fund may be wound up,
  - (a) on the happening of any event which, in the opinion of the Trustees, requires the scheme to be wound up; or
  - (b) if seventy five per cent of the Unitholders of a scheme pass a resolution that the scheme be wound up; or
  - (c) if SEBI so directs in the interest of the Unitholders.
- ii. Where a Scheme is to be wound up pursuant to sub clause (i) above, the Trustees shall give notice within one day, disclosing of the circumstances leading to the winding up of the Scheme:
  - a) to SEBI; and
  - b) in two daily newspapers having circulation all over India and also in a vernacular newspaper circulating at the place where the Mutual Fund is established.

The trustees shall obtain consent of the unit holders participating in the voting by simple majority on the basis of one vote per unit and publish the results of voting within forty five days from the publication of notice. In case the trustees fail to obtain the required consent of the unitholders, the schemes shall be reopened for business activities from the second business day after publication of results of the voting.

### **Effect of Winding Up**

As per Regulation 41 (1) of SEBI (Mutual Fund) Regulations, 1996 , On and from the date of the publication of the notice as stated above, the Trustees or the AMC as the case maybe, shall (a) cease to carry on any business activities in respect of the Scheme(s) so wound up; (b) cease to create and/or cancel Units in the Scheme(s); (c) cease to issue and/or redeem Units in the Scheme(s).

### **Procedure and Manner of Winding Up**

As per Regulation 41 (1) of SEBI (Mutual Fund) Regulations, 1996 In the event of the Scheme being wound up as above-mentioned, the AMC shall proceed as follows:

- The Trustee shall call a meeting of the Unit holders of the Scheme to consider and pass necessary resolutions by simple majority of Unit holders present and voting at the meeting for authorising the AMC or any other person /agency to take the steps for winding up of the Scheme.
- Provided that a meeting shall not be necessary if the Scheme is wound up at the end of the maturity period.

- The Trustee or the person authorised above shall dispose the assets of the Scheme concerned in the best interests of the Unit holders of the Scheme.
- The proceeds of the sale made in pursuance of the above, shall in the first instance be utilised towards discharge of such liabilities as are properly due under the Scheme and after making appropriate provision for meeting the expenses connected with such winding up, the balance shall be paid to the Unit holders in proportion to their respective interests in the assets of the Scheme as on the date when the decision for the winding up was taken.
- On the completion of the winding up, the Trustee shall forward to SEBI and the Unit holders, a report on the winding up containing particulars such as circumstances leading to the winding up, the steps taken for disposal of assets of the Scheme before winding up, expenses of the Scheme for winding up, net assets available for distribution to the Unit holders and a certificate from the Auditors of the Mutual Fund.
- Notwithstanding anything contained herein, the application of the provisions of SEBI Regulations in respect of disclosures of half-yearly reports and annual reports shall continue to be applicable until the winding up is completed or the Scheme ceases to exist.
- After the receipt of report referred to the above under "Procedure and Manner of Winding up" if SEBI is satisfied that all measures for winding up of the Scheme have been complied with, the Scheme shall cease to exist.
- The aforesaid provisions pertaining to "Procedure and Manner of Winding Up" shall apply in respect of each individual scheme and to the extent possible shall apply mutatis mutandis to each Investment Plan.
- The units of a mutual fund scheme shall be delisted from a recognised stock exchange in accordance with the guidelines as may be specified by SEBI.

**As per Paragraph 7.2 of SEBI Master Circular dated June 27, 2024 Listing of Mutual Fund schemes that are in the process of winding up has specified the following:**

Presently, in terms Regulation 32 of SEBI (Mutual Funds) Regulations, 1996 ("MF Regulations") and as per Paragraph 4.4 of SEBI Master Circular dated June 27, 2024, every close-ended scheme and units of segregated portfolio shall be listed on recognized stock exchanges.

As per MF Regulations, there are several steps envisaged with respect to winding up of Mutual Fund schemes before the scheme ceases to exist. During this process, such units can be listed and traded on a recognized stock exchange, which may provide an exit to investors.

In terms of Regulation 31B(1) of the MF Regulations, the units of Mutual Fund schemes can be listed in the recognized stock exchange. Accordingly, the units of Mutual Fund schemes which are in the process of winding-up in terms of Regulation 39(2)(a) of MF Regulations, shall be listed on recognized stock exchange, subject to compliance with listing formalities as stipulated by the stock exchange.

However, pursuant to listing, trading on stock exchange mechanism will not be mandatory for investors, rather, if they so desire, may avail an optional channel to exit provided to them.

Initially, trading in units of such a listed scheme that is under the process of winding up, shall be in dematerialised form.

AMCs shall enable transfer of such units which are held in the form of Statement of Account (SoA) / unit certificates.

Detailed operational modalities for trading and settlement of units of MF schemes that are under the process of winding up, shall be finalized by the stock exchanges where units of such schemes are being listed, in consultation with SEBI. The operational modalities shall include the following:

- a) Mechanism for order placement, execution, payment and settlement;
- b) Enabling bulk orders to be placed for trading in units;
- c) Issue related to suspension of trading, declaration of date for determining the eligibility of unitholders etc. in respect of payments to be made by the AMC as part of the winding up process;

d) Disclosures to be made by AMCs including disclosure of NAV on daily basis and scheme portfolio periodically etc.

The stock exchange shall develop a mechanism along with RTA for trading and settlement of such units held in the form of SoA/ Unit Certificate.

The AMC, its sponsor, employees of AMC and Trustee shall not be permitted to transact (buy or sell) in the units of such schemes that are under the process of being wound up. The compliance of the same shall be monitored both by the Board of AMC and Trustee.

### **1. Consolidation of Folios**

In case an investor has multiple folios, the AMC reserves the right to consolidate all the folios into one folio, based on such criteria as may be determined by the AMC from time to time. In case of additional purchases in same scheme / fresh purchase in new scheme, if the investor fails to provide the folio number, the AMC reserves the right to allot the units in the existing folio, based on such integrity checks as may be determined by the AMC from time to time.

### **2. Miscellaneous**

Investors may note that in case of fresh/additional purchases, if the name of the Scheme on the application form/transaction slip differs with the name on the Cheque/Demand Draft/payment instrument/transfer letter, then the AMC will allot units under the Scheme mentioned on the application form. In case of fresh/additional purchases, if the Scheme name is not mentioned on the application form/transaction slip, then the units will be allotted under the Scheme mentioned on the Cheque/Demand Draft/ payment instrument/transfer letter. The Plan/Option that will be considered in such cases if not specified by the customer will be the default option of the Scheme as per the SID. However, in case additional purchase is under the same scheme as fresh purchase, then the AMC reserves the right to allot units in the option under which units were allotted at the time of fresh purchase.

### **3. Bank Mandate Requirement**

- a) For all fresh purchase transactions made by means of a cheque, where the account on which the cheque is drawn for purchase of units differs from the bank mandate account provided in the application, a copy of blank/cancelled cheque of bank mandate account is required to be provided. This condition is also applicable to all purchase transactions made by means of a Demand Draft.
- b) For Change of Bank mandate requests a copy of cheque of new bank mandate account is required to be provided. All Change of Bank Mandate requests submitted without copy of cheque are liable to be rejected.
- c) In case the application is not accompanied by the cheque copy, the AMC reserves the right to reject the application also the AMC will not be liable in case the redemption/dividend proceeds are credited to wrong account in absence of above cheque copy.
- d) In case of Change of Bank Mandate requests along with redemptions requests, where copy of cheque as mandated above is not submitted, redemption proceeds will be issued/credited to existing bank mandate account.

### **4. Application with/without broker**

Investors may note and follow the below-mentioned directions while applying for the units of the schemes of the Mutual Fund:

- 1) In case where the Broker code is already printed in Application form/Transaction form/Purchase request form by the AMC/ Registrar/Distributor:

Where the Investor wishes to apply directly (i.e. not through existing broker/distributor), then the investor should strike off the broker code (printed) and should write "Direct Applications" or "Not Applicable (N.A.)" and countersign the same.

- 2) In case where the Broker code is not printed in Application form/Transaction form/Purchase request form:



*In case of direct applications*, the Investor should write in the space provided for the broker code “Direct Application” or “Not Applicable (N.A.)”.

- 3) In case of change in broker, the investor will be required to strike off the old broker code and countersign near the new broker code, before submitting the application form/transaction form/purchase form to the designated ISC's/OPA (Official points of Acceptance).
- 4) The Registrar and the AMC shall affect the application for changes in the broker code within the reasonable period of time from the time of receipt of written request from the investor at the designated ISC's/OPA. Decision of the Registrar/AMC in this regard shall be final and acceptable to all.
- 5) All Unitholders who have invested/may invest through channel distributors and intend to make their future investments through the direct route, are advised to complete the procedural formalities prescribed by AMC from time to time.

### **C. General Information**

#### **1. Inter-Scheme Transfer of Investments**

Transfers of investments from one scheme to another scheme in the Mutual Fund shall be allowed only if

- a) Such transfers are done at the prevailing market price for quoted instruments on spot basis.  
(Explanation: spot basis shall have same meaning as specified by stock exchange for spot transactions).
- b) The securities so transferred shall be in conformity with the investment objective of the scheme to which such transfer has been made.

#### **2. Aggregate investment in the Scheme under the following categories:**

In accordance with Paragraph on ‘Scheme Related Disclosures’ of SEBI Master Circular for Mutual Funds dated June 27, 2024, the aggregate investment in the respective Scheme(s) by Board of Directors of Abakkus Investment Managers Private Limited and key personnel:

<b>Aggregate amount invested in the Scheme (market value in Rs.)</b>			
<b>Scheme Name</b>	<b>AMC Board of Directors</b>	<b>Key Personnel (Excluding Fund Manager)</b>	<b>Fund Manager</b>
Not Applicable	Not Applicable	Not Applicable	Not Applicable

#### **3. Dematerialisation and Rematerialisation procedures**

##### **Option to hold units in Dematerialized (Demat) Form**

As per Paragraph 14.4.2 of SEBI Master Circular dated June 27, 2024, Abakkus Mutual Fund provides an option to the investors of the Fund to mention demat account details in the subscription form, in case they desire to hold units in the dematerialized mode. The option to subscribe to the units in the dematerialized mode is available for all the schemes of the Fund, except for plans/options, where dividend distribution frequency is less than one month.

##### **Option to hold units in Dematerialized Form for SIP Transactions**

As per Paragraph 14.4.2 of SEBI Master Circular dated June 27, 2024 offering the option to hold units in dematerialized form, Abakkus Mutual Fund has extended the facility to investors of the Fund for investment made through Systematic Investment Plan (SIP) for all the Schemes of the Abakkus Mutual Fund offering SIP.

The units will be allotted in dematerialized mode based on the applicable NAV, as per terms of the respective Schemes and credited to the investors’ demat account every Monday for realization status received during the previous week (Monday to Friday). The allotment of units will be subject to the guidelines/procedures specified by the Depositories (NSDL/CDSL) from time to time.

#### **4. ASBA disclosures**

In accordance with SEBI Master Circular for Mutual Funds dated June 27, 2024, ASBA facility shall be provided to investors as a supplementary facility in addition to existing facility through cheques/demand drafts or any other mode of electronic payment for subscribing to the units of scheme(s) during the New Fund Offer period. Please note that ASBA facility is purely optional and not mandatory.

ASBA disclosures are provided under **Section VI – How to apply - Mode of Payment**

#### **5. Portfolio Turnover Details**

For open-ended Schemes, it is expected that there would be a number of Subscriptions and Redemptions on a daily basis. The fund manager depending upon the view and subject to trading opportunities, may trade in securities, which will lead to 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 Schemes. Frequent trading may increase the profits which will offset the increase in costs. The fund manager will endeavor 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 of accuracy, the likely turnover in the portfolio of the Schemes.

For Schemes following a passive investment strategy, the endeavour will be to minimise portfolio turnover subject to the exigencies and needs of the Scheme. Generally, turnover will be confined to rebalancing of portfolio on account of new subscriptions, redemptions and change in the composition of the underlying index and corporate actions of securities included in the underlying index.

Close-ended schemes generally follow a buy-and-hold strategy. Hence, the portfolio turnover is likely to be lower.

#### **6. Soft Dollar Arrangements**

In terms of Clause 10.1.15 of SEBI Master Circular for Mutual Fund dated June 27, 2024, soft dollar arrangements between the Asset Management companies and brokers should be limited to benefits (like free research report, etc.) that are in the interest of investors and the same should be suitably disclosed. In this context, Abakkus Investment Managers Private Limited/ Abakkus Mutual Fund may use the services provided by the broker to the extent that it meets the criteria laid down in Abakkus' Soft Dollar Policy and is in line with SEBI Master Circular referenced above. Brokers do provide information based services like free research reports, meetings/ calls with subject experts, etc. which can facilitate in investment decision making process and/or trade execution related services. ( dedicated hot-lines may be set up by few brokers which aid execution of trades. Such arrangements are in the interest of investors of Abakkus Mutual Fund. Further, the Abakkus Investment Managers Private Limited / Abakkus Mutual Fund are under no obligation to provide business to in lieu of these services.

#### **7. Investors' Personal Information and disclosure of Personal Information to third parties**

The AMC, being a SEBI registered intermediary governed by the provisions of SEBI (Intermediaries) Regulations, 2008 read with SEBI Master Circular no. SEBI/HO/MIRSD/ SEC/FATF/P/CIR/2023/169 dated October 12, 2023 on Know Your Client (KYC) norms for the securities market is authorised to collect information/relevant KYC documents relating to investor(s) in connection with KYC process of investor(s) and in connection with the transactions executed by such investor(s). The Fund and the AMC recognize the importance of protecting the Personal Information of its Investor(s) (as defined in the Privacy Policy) and the documents furnished and have established policies and procedures in place for appropriate handling and for maintaining confidentiality and secrecy of the Personal Information of its Investor(s) and the KYC documents. As per the Code of Conduct for intermediaries stipulated by SEBI (Intermediaries) Regulations, 2008, the intermediaries shall not divulge to anybody, either orally or in writing, directly or indirectly, any confidential information about its clients/investors, which has come to its knowledge, without taking prior permission of its clients/investors except where such disclosures are required to be made in compliance with any law

for the time being in force and is in line with the Privacy Policy. The Personal Information provided in the scheme application form/s, any transaction document and/or provided by Investor(s) shall be governed by the terms of the Privacy Policy as displayed on the <https://www.abakkusmf.com/> ("Website"). By subscribing to the Unit/s of the Scheme/s the Investor(s) are deemed to have consented for the usage of the Personal Information as stated herein and in the Privacy Policy.

Personal Information collected by the AMC in the physical form and through the Website may be converted and stored in electronic form by the AMC and/or its Registrar, at its sole discretion for the purposes mentioned in the Privacy Policy.

The AMC reserves the right to use the Personal Information and to share/disclose the same with third parties as stated in the Privacy Policy. Notwithstanding anything contained in the Privacy Policy, the AMC may also share, disclose, or remit in any form, mode or manner, all/any of the Personal Information collected from the Investor(s), including all changes and updates thereto, as and when provided, with any Indian or foreign governmental authority including but not limited to the RBI, SEBI, Income Tax Authority, Financial Intelligence Unit –India (FIU-IND), or any other judicial and quasi judicial authorities or investigation agencies, to the extent required by such authority, without any obligation of advising/informing Investors/Unit holder(s) about the same. The AMC may also share/exchange with other SEBI registered intermediaries on a reciprocity basis the Personal Information, including information on FATCA/CRS/UBO and/or any details of transaction(s) undertaken by the Investor(s) for single updation/ submission for operational/administrative convenience of the AMC and also to enable the AMC to serve the Unitholder(s) better.

## **8. Borrowing by the Mutual Fund**

Under the SEBI (MF) Regulations, the Mutual Fund is allowed to borrow to meet the temporary liquidity requirements of its Scheme(s) for the purpose of Repurchase or Redemption of Units or the payment of interest or IDCW to the Unitholders. Further, as per the SEBI (MF) Regulations, the Mutual Fund shall not borrow more than 20% of the Net Assets of the Scheme and the duration of such borrowing shall not exceed a period of six months. The Mutual Fund may raise such borrowings after approval by the Trustee from Sponsors or any of their Associate/Group Companies or Banks in India or any other entity at market related rates prevailing at the time and applicable to similar borrowings. The security for such borrowings, if required, will be determined by the Trustee. Such borrowings, if raised, may result in a cost which would be dealt with in consultation with the Trustee.

## **9. E-mail Communication**

For those Unitholders who have provided an e-mail address, the AMC will send the communication by e-mail. It is deemed that the Unitholder is aware of all security risks including possible third party interception of the documents and contents of the documents becoming known to third parties.

## **10. Website**

The website of the Fund/AMC is intended for the use of Resident Indians, Non Resident Indians, persons of Indian Origin and Foreign Institutional Investors registered with SEBI. It should not be regarded as a solicitation for business in any jurisdiction other than India. In particular the information is not for distribution and does not constitute an offer to sell or the solicitation of an offer to buy securities in any jurisdiction where such activity is prohibited. Any persons resident outside India who nevertheless intend to respond to this material must first satisfy themselves that they are not subject to any local requirements, which restrict or prohibit them from doing so. Information other than that relating specifically to the AMC/Fund and its products is for information purposes only and should not be relied upon as a basis for investment decisions. The Fund/AMC cannot be held responsible for any information contained in any website linked from the Mutual Fund website.

#### D. Associate Transactions

Abakkus Mutual Fund is registered with SEBI and has not had any transactions with the Sponsor or any of the Sponsor's associates from the date of registration until the date of this SAI.

The AMC has entered into an agreement with Sponsor to avail research services on non-binding and non-discretionary basis. The AMC may further utilize the services of the Sponsor, group companies and any other subsidiary or associate company of the Sponsor established or to be established at a later date, who is in a position to provide the requisite services to the AMC.

The scheme till date has not invested in group companies of the sponsor or the sponsor in accordance with the provisions of the MF Regulations.

No schemes of the Mutual Fund shall invest more than 25% of its net assets in group companies.

The AMC, on behalf of the Mutual Fund, shall conduct its business with the Sponsor or any of the Sponsor's associates (including their employees or relatives) on commercial terms and on arms-length basis and at mutually agreed terms and conditions to the extent permitted under the Regulations.

The Mutual Fund does not propose to have dealings, transactions and any services used for marketing and distributing the scheme and the commissions paid to them to the associates of the Sponsor or the Asset Management Company.

**Details of brokerage/commission paid to associates/related parties/group companies of Sponsor for the past 3 financial years is given below:**

- **Details of Brokerage paid to associates/related parties/group companies of Sponsor/AMC for the past 3 financial years is given below:** Not applicable

Name of associates/related parties/group companies of Sponsor/AMC	Nature of association/ nature of relation	Period covered	Value of transaction		Brokerage Paid	
			Rs. Cr.	% of total value of transaction of fund	Rs. Cr.	% of total brokerage paid by the fund
NA	NA	NA	NIL	NIL	NIL	NIL

- **Details of Commission paid to associates/related parties/group companies of Sponsor/AMC for the past 3 financial years is given below:** Not applicable

Name of associates/related parties/group companies of Sponsor/AMC	Nature of association/ nature of relation	Period covered	Value of transaction		Brokerage Paid	
			Rs. Cr.	% of total value of transaction of fund	Rs. Cr.	% of total brokerage paid by the fund
NA	NA	NA	NIL	NIL	NIL	NIL

- **Dealing with Associates : Not applicable**

No such Transactions (aggregate purchase and sale) in securities were carried out with associates during the past 3 financial years.

- **Policy for investing in group companies of the sponsor:**

No mutual fund Scheme shall make any investments in any unlisted security of an associate or group company of the Sponsor or any security issued by way of private placement by an associate or group company of the Sponsor or the listed securities of group companies of the Sponsor which is in excess of 25% of its net assets except for investments by equity-oriented ETFs and index funds based on widely tracked and non-bespoke indices, wherein the investments shall be made upto the weightage of the constituents of the underlying index, subject to overall cap of 35% of the net assets of the scheme in the group companies of the sponsor, in accordance with the SEBI circular no. SEBI/HO/IMD/IMD-PoD 2/P/CIR/2024/098 dated July 8, 2024. The investments in group companies of the sponsor are made in the normal course of business, considering the respective scheme objectives, other investment parameters such as favorable valuation, long term prospects of the companies and in the interest of unitholders.

#### **E. Documents Available for Inspection**

The following documents will be available for inspection at the office of the Mutual Fund at 9<sup>th</sup> Floor, Param House, Shanti Nagar, Santacruz-Chembur Link Road, Santacruz East, Mumbai, Maharashtra 400055. during business hours on any day (excluding Saturdays, Sundays and public holidays):

- Memorandum and Articles of Association of the AMC
- Investment Management Agreement
- Trust Deed and amendments thereto, if any
- Mutual Fund Registration Certificate granted by SEBI.
- Custodian Agreement
- Registrar Agreement
- Consent of Auditors and Legal Advisors to act in the said capacity
- Securities and Exchange Board of India (Mutual Funds) Regulations, 1996 and amendments from time to time thereto.
- Indian Trusts Act, 1882.
- The scheme wise annual report

#### **F. Investor Grievances Redressal Mechanism**

Investors can lodge any service request or complaints or enquire about NAVs, Unit Holdings, Valuation, Dividends, etc. by calling the Investor line of the AMC at **1800 267 1849** or email – [mf.investor.support@abakkusinvest.com](mailto:mf.investor.support@abakkusinvest.com). The service representatives may require personal information of the Investor for verification of his/her identity in order to protect confidentiality of information. The AMC will always endeavour to handle transactions efficiently and to resolve any investor grievances promptly.

Any complaints should be addressed to Mr. Sanjay Joshi, who has been appointed as the Investor Relations Officer and can be contacted at:

Mr. Sanjay Joshi,  
Investor Relations Officer,  
Abakkus Investment Managers Private Limited.  
**Tel No:** +91 22 6884 6683; **Email:** [mf.iro@abakkusinvest.com](mailto:mf.iro@abakkusinvest.com)

**Corporate Address:** 9<sup>th</sup> Floor, Param House, Shanti Nagar, Santacruz-Chembur Link Road, Santacruz East, Mumbai – 400055, Maharashtra. For any grievances with respect to transactions through stock exchange mechanism-Unit Holders must approach either their stockbroker or the investor grievance cell of the respective stock exchange or their distributor.

#### **The complaint can also be lodged on SEBI's SCORES Platform:**

- Online Dispute Resolution Platforms: SCORES is a web based centralized grievance redressal system which enables investors to lodge and follow up their complaints and track the status of redressal of such complaints online. Through

this system, the investor should be able to submit his/her complaint on an online basis, which shall then be monitored and forwarded by the concerned Desk Officer(s) at SEBI to the concerned AMC's, who would then in-turn be required to suitably redress & upload status thereof on this platform itself, within the stipulated time period. For redressal of complaints, investors can visit <https://scores.sebi.gov.in>

- Online Dispute Resolution (ODR) Portal: Pursuant to SEBI Master Circular for Mutual Funds dated June 27, 2024, common Online Dispute Resolution ('ODR') Portal has been established in order to harnesses online conciliation and online arbitration for resolution of disputes arising in the Indian Securities Market. The investors can access the link to ODR portal viz . <https://www.smartodr.in> which is also made available on our website.

- **INVESTOR COMPLAINTS**

a. Given below is the status of complaints received during the period April 1, 2025 – October 31, 2025

Redressal of Complaints received during		2025-2026										
Name of the Mutual Fund		Abakkus Mutual Fund										
Total Number of Folios		Not applicable										
Complain t code	Type of complaint#	(a) No. of complaints pending at the beginnings of the year	Action on (a) and (b)									
			(b) No of complaint s received during the year	Resolved				Non Actiona ble*	Pending		6-9 months	9-12 months
				Within 30 days	30-60 days	60-180 days	Beyond 180 days		0-3 months	3-6 months		
I A	Non receipt of Dividend on Units											
I B	Interest on delayed payment of Dividend											
I C	Non receipt of Redemptio n Proceeds											
I D	Interest on delayed payment of Redemptio n											
II A	Non receipt of Statement of Account/U nit Certificate											
II B	Discrepanc y in											

	Statement of Account											
II C	Data corrections in Investor details											
II D	Non receipt of Annual Report/ Abridged Summary											
III A	Wrong switch between Schemes											
III B	Unauthorized switch between Schemes											
III C	Deviation from Scheme attributes											
III D	Wrong or excess charges/load											
III E	Non updation of changes viz. address, PAN, bank details, nomination, etc											
III F	Delay in allotment of Units											
IV	Others **											

b. Given below is the status of complaints received from SEBI received during the period April 1, 2025 – October 31, 2025: Not applicable

#### G. Information pertaining to Investments by the Schemes of the Fund

##### 1. Derivative strategies

Derivative Strategies: As allowed under the SEBI guidelines on derivatives, the fund manager will employ various other stock and index derivative strategies by buying or selling stock/index futures and/or options.

##### Objective of the Strategy

The objective of the strategy is to earn low volatility consistent returns.



### **Risk Associated with this Strategy**

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

Execution Risk: The prices which are seen on the screen need not be the same at which execution will take place.

### **Equity Derivative Instruments:**

Equity derivative instrument include but are not limited to futures (both stock and index) and options (stock and index).

Derivatives are financial contracts of pre-determined fixed duration, like stock Futures/options and index futures and options, whose values are derived from the value of an underlying primary financial instrument such as: interest rates, exchange rates, commodities, and equities.

Derivatives can be either exchange traded or can be over the counter (OTC). Exchange traded derivatives are listed and traded on stock exchanges whereas OTC derivative transactions are generally structured between two counterparties. The risks associated with derivatives are similar to those associated with equity investments. The additional risks could be on account of:

1. Illiquidity
2. Potential mis - pricing of the Futures / Options
3. Inability of derivatives to correlate perfectly with the underlying (Indices, Assets, Exchange Rates)
4. Cost of hedge can be higher than adverse impact of market movements.
5. An exposure to derivatives in excess of the hedging requirements can lead to losses.
6. An exposure to derivatives can also limit the profits from a genuine investment transaction.

Exchange traded derivative contracts in stocks and indices in India are currently cash settled at the time of maturity/ expiry.

### **2. Swing Pricing**

- The Swing Framework shall apply in case of scenarios related to net outflows from the schemes.
- SEBI will determine 'market dislocation' either based on AMFI's recommendation or suo moto.
- Once market dislocation is declared, SEBI will notify that swing pricing will be applicable for a specified period.
- Thereafter, mandatory swing pricing will apply for applicable Schemes which:
- have 'High' or 'Very High' risk on the risk-o-meter (as of the most recent period at the time of declaration of market dislocation); and
- classify themselves in cells A-III, B-II, B-III, C-I, C-II and C-III of Potential Risk Class (PRC) Matrix.
- Swing factor as per below matrix shall be made applicable to the above-mentioned schemes and the NAV will be adjusted for the swing factor

Swing factor			
Max Credit Risk of scheme →	Class A (CRV* >=12)	Class B (CRV* >=10)	Class C (CRV* <10)
Max Interest Rate Risk (CRV* ↓)			
Class I: (Macaulay duration <=1 year)	Optional	Optional	1.5%
Class II: (Macaulay duration <=3 years)	Optional	1.25%	1.75%
Class III: Any Macaulay duration	1%	1.5%	2%
*CRV - Credit Risk Value			

- **Impact on investors:**

- When the Swing Framework is triggered and swing factor is made applicable, both the incoming (unit holders who submit purchase/switch-in requests) and outgoing investors (unit holders who submit redemption/switch out requests) shall get NAV adjusted downwards for swing factor.
- Swing pricing shall be made applicable to all unitholders at PAN level with an exemption for redemptions up to Rs. 2 lacs for each mutual fund scheme for both normal times and market dislocation.

- **Periodic Disclosures:**

Disclosures pertaining to NAV adjusted for swing factor shall be made by the AMC in SIDs and in the prescribed format in the SAI and in scheme wise Annual Reports and Abridged summary thereof and on the website in case swing pricing framework has been made applicable for a scheme of the Fund.

- Scheme performance shall be calculated as per unswung NAV.

**A. Threshold for Trigger Swing Pricing during Normal Times for all open-ended debt scheme (Except overnight funds, Gilt Funds and Gilt with 10-year maturity funds)**

The indicative range of Swing Factor during normal times shall be:

- 10% net flow from any debt scheme other than liquid scheme.
- 15% net flow from Liquid Scheme.

These are floor figures, and the AMC reserves the right to set limits higher, depending on the dynamics of the scheme both on liability side and on the asset side.

**B. Indicative range of Swing Threshold:**

The indicative range amount of Swing factor based on PRC Matrix is as follows:

Sr. No.	A	B	C
1.	0.00 %	0.05 %	0.20%
2.	0.05 %	0.10%	0.40%
3.	0.10%	0.20%	0.60%

These are floor figures amounts, and the AMC reserves the right to set limits higher, depending on the dynamics of the scheme both on liability side and on the asset side.

**C. Triggering Swing-Pricing on re-opening of Scheme after announcement of winding-up.**

For instances where Abakkus Investment Managers Private Limited/Abakkus Mutual Fund decides to roll back the decision to wind up the scheme, it shall mandatorily invoke the swing -pricing upon re-opening a scheme for subscriptions and redemptions post such announcement.

The indicative range of swing pricing for the parameter of “re-opening of Scheme after announcement of winding-up” shall be the same as applicable for normal times.

The indicative range of swing pricing shall be applied for a higher of swing period as decided by the Board of Abakkus Investment Managers Private Limited or for a minimum of 7 working days, upon re-opening a scheme for subscriptions and redemptions.

### **3. Provisions on creation of Segregated portfolio**

**Conditions for creation of Segregated Portfolio:**

Creation of segregated portfolio shall be subject to guidelines specified by SEBI from time to time and includes the following:

- 1) Segregated portfolio may be created, in case of a credit event at issuer level i.e. downgrade in credit rating by a SEBI registered Credit Rating Agency (CRA), as under:
  - a) Downgrade of a debt or money market instrument to ‘below investment grade’, or

- b) Subsequent downgrades of the said instruments from 'below investment grade', or
  - c) Similar such downgrades of a loan rating.
- 2) In case of difference in rating by multiple CRAs, the most conservative rating shall be considered. Creation of segregated portfolio shall be based on issuer level credit events as detailed above and implemented at the ISIN level.
  - 3) Creation of segregated portfolio is optional and is at the discretion of the Abakkus Investment Managers Private Limited.
  - 4) AMC has a written down policy on Creation of segregated portfolio which is approved by the Trustees.

## **Definitions**

1. The term 'segregated portfolio' shall mean a portfolio, comprising of debt or money market instrument affected by a credit event, that has been segregated in a mutual fund scheme.
2. The term 'main portfolio' shall mean the scheme portfolio excluding the segregated portfolio.
3. The term 'total portfolio' shall mean the scheme portfolio including the securities affected by the credit event.

## **Process for Creation of Segregated Portfolio**

- 1) On the date of credit event, AMC should decide on creation of segregated portfolio. Once AMC decides to segregate portfolio, it should:
  - a) seek approval of trustees prior to creation of the segregated portfolio.
  - b) immediately issue a press release disclosing its intention to segregate such debt and money market instrument and its impact on the investors. Abakkus Mutual Fund will also disclose that the segregation shall be subject to Trustee approval. Additionally, the said press release will be prominently disclosed on the website of the AMC.
  - c) ensure that till the time the trustee approval is received, which in no case shall exceed 1 business day from the day of credit event, the subscription and redemption in the scheme will be suspended for processing with respect to creation of units and payment on redemptions.
- 2) Once Trustee approval is received by the AMC:
  - a. Segregated portfolio will be effective from the day of credit event
  - b. AMC shall issue a press release immediately with all relevant information pertaining to the segregated portfolio. The said information will also be submitted to SEBI.
  - c. An e-mail or SMS will be sent to all unit holders of the concerned scheme.
  - d. The NAV of both segregated and main portfolios will be disclosed from the day of the credit event.
  - e. All existing investors in the scheme as on the day of the credit event will be allotted equal number of units in the segregated portfolio as held in the main portfolio. The AMC shall work out with the Registrar & Transfer Agent viz., Kfin. The mechanics of unit creation to represent the holding of segregated portfolio and the same shall appear in the account statement of the unitholders.
  - f. No redemption and subscription will be allowed in the segregated portfolio. However, upon recovery of any money from segregated portfolio, it will be immediately distributed to the investors in proportion to their holding in the segregated portfolio.
  - g. AMC should enable listing of units of segregated portfolio on the recognized stock exchange within 10 Business days of creation of segregated portfolio and also enable transfer of such units on receipt of transfer requests.
  - h. Investors redeeming their units will get redemption proceeds based on the NAV of main portfolio and will continue to hold the units of segregated portfolio. Investors subscribing to the Scheme will be allotted units only in the main portfolio based on its NAV.

- 3) If the trustees do not approve the proposal to segregate portfolio, AMC will issue a press release immediately informing investors of the same.
- 4) In case trustees do not approve the proposal of segregated portfolio, subscription and redemption applications will be processed based on the NAV of total portfolio.

#### **Valuation and Processing of Subscription and Redemption Proceeds**

Notwithstanding the decision to segregate the debt and money market instrument, the valuation process shall take into account the credit event and the portfolio shall be valued based on the principles of fair valuation (i.e. realizable value of the assets) in terms of the relevant provisions of SEBI (Mutual Funds) Regulations, 1996 and Circular(s) issued thereunder.

All subscription and redemption requests for which NAV of the day of credit event or subsequent day is applicable will be processed as under:

- (i) Upon trustees' approval to create a segregated portfolio –
  - Investors redeeming their units will get redemption proceeds based on the NAV of main portfolio and will continue to hold the units of segregated portfolio.
  - Investors subscribing to the scheme will be allotted units only in the main portfolio based on its NAV.
- (ii) In case trustees do not approve the proposal of segregated portfolio, subscription and redemption applications will be processed based on the NAV of total portfolio.

#### **Disclosures**

1. A statement of holding indicating the units held by the investors in the segregated portfolio along with the NAV of both segregated portfolio and main portfolio as on the day of the credit event shall be communicated to the investors within 5 Business days of creation of the segregated portfolio.
2. Adequate disclosure of the segregated portfolio shall appear in all scheme related documents, in monthly and half yearly portfolio disclosures and in the annual report of the mutual fund and the scheme.
3. The Net Asset Value (NAV) of the segregated portfolio shall be declared on daily basis.
4. The information regarding number of segregated portfolios created in the Scheme shall appear prominently under the name of the Scheme at all relevant places such as SID, KIM-cum-Application Form, advertisement, AMC and AMFI websites, etc.
5. The performance of the Scheme required to be disclosed at various places shall include the impact of creation of segregated portfolio and shall clearly reflect the fall in NAV to the extent of the portfolio segregated due to the credit event and the said fall in NAV along with recovery(ies), if any, shall be disclosed as a footnote to the scheme performance.
6. The disclosures at paragraph (d) and (e) above regarding the segregated portfolio shall be carried out for a period of at least 3 years after the investments in segregated portfolio are fully recovered/written-off.
7. The investors of the segregated portfolio shall be duly informed of the recovery proceedings of the investments of the segregated portfolio. Status update may be provided to the investors at the time of recovery and also at the time of writing-off of the segregated securities.

#### **Monitoring by Trustees**

In order to ensure timely recovery of investments of the segregated portfolio, Trustees shall ensure that:

1. The AMC puts in sincere efforts to recover the investments of the segregated portfolio.
2. Upon recovery of money, whether partial or full, it shall be immediately distributed to the investors in proportion to their holding in the segregated portfolio. Any recovery of amount of the security in the segregated portfolio even after the write off shall be distributed to the investors of the segregated portfolio.
3. An Action Taken Report (ATR) on the efforts made by the AMC to recover the investments of the segregated portfolio is placed in every meeting of the Trustees till the investments are fully recovered/ written-off.

4. The Trustees shall monitor the compliance of the SEBI circular in respect of creation of the segregated portfolio and disclose in the half-yearly trustee reports filed with SEBI, the compliance in respect of every segregated portfolio created.

In order to avoid mis-use of segregated portfolio, Trustees shall ensure to have put in place a mechanism to negatively impact the performance incentives of Fund Managers, Chief Investment Officer (CIO) / Head – Investments & Research, etc. involved in the investment process of securities under the segregated portfolio, mirroring the existing mechanism for performance incentives of Abakus Investment Managers Private Limited, including claw back of such amount to the segregated portfolio of the scheme.

#### **TER for the Segregated Portfolio**

- 1) AMC will not charge investment and advisory fees on the segregated portfolio. However, TER (excluding the investment and advisory fees) can be charged, on a pro-rata basis only upon recovery of the investments in segregated portfolio.
- 2) The TER so levied shall not exceed the simple average of such expenses (excluding the investment and advisory fees) charged on daily basis on the main portfolio (in % terms) during the period for which the segregated portfolio was in existence. In addition to the TER mentioned above, the legal charges related to recovery of the investments of the segregated portfolio may be charged to the segregated portfolio as mentioned below.
- 3) The legal charges related to recovery of the investments of the segregated portfolio may be charged to the segregated portfolio in proportion to the amount of recovery. However, the same shall be within the maximum TER limit as applicable to the main portfolio. The legal charges in excess of the TER limits, if any, shall be borne by the AMC.
- 4) The costs related to segregated portfolio shall in no case be charged to the main portfolio.

#### **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:

1. Investor holding units of segregated portfolio may not be able to liquidate their holding till the time recovery of money from the issuer.
2. Security comprises of segregated portfolio may not realise any value.
3. Listing of units of segregated portfolio in recognised stock exchange does not necessarily guarantee their liquidity. There may not be active trading of units in the stock market. Further trading price of units on the stock market may be significantly lower than the prevailing NAV. The trading price of units on the stock exchange may be significantly lower than the prevailing Net Assets Value (NAV) of the segregated portfolio.

#### **Illustration of Segregated Portfolio:**

Portfolio Date	31-Mar-25
Downgrade Event Date	31-Mar-25
Downgrade Security	7.65% C Ltd from AA+ to B
Valuation Marked Down	25%

Mr. X is holding 1000 Units of the Scheme, amounting to (1000\*15.0573) Rs.15,057.3/-.

**Portfolio Before Downgrade Event**

Security Price	Rating	Type of the Security	Qty	Per Unit(Rs)	Market Value (Rs. in Lacs)	% of Net Assets
7.80%A FINANCE LTD	CRISIL AAA	NCD	3,200,000	102.812	3289.98	21.850
7.70 % B LTD	CRISIL AAA	NCD	3,200,000	98.5139	3182.00	21.133
<b>7.65 % C Ltd</b>	<b>CRISIL B*</b>	<b>NCD</b>	<b>3,200,000</b>	<b>73.843</b>	<b>2362.97</b>	<b>15.693</b>
D Ltd (15/May/2024)	ICRA A1+	CP	3,200,000	98.3641	3147.65	20.904
7.65 % E LTD	CRISIL AA	NCD	3,200,000	98.6757	2960.27	19.660
Cash/Cash Equivalents					114.47	0.760
Net Assets					<b>15057.34</b>	
Unit Capital(no of units)					<b>1000.00</b>	
NAV (Rs)					<b>15.0573</b>	

\* Marked down by 25% on the date of credit event. Before Marked down the security was valued at Rs.98.4570 per unit on the date of credit event i.e on 31st March 2025, NCD of C Ltd (7.65%) will be segregated as separate portfolio.

**Main Portfolio as on 31st March 2025**

Security Price	Rating	Type of the Security	Qty	Per Unit(Rs)	Market Value (Rs. in Lacs)	% of Net Assets
7.80% A FINANCE LTD	CRISIL AAA	NCD	3,200,000	102.812	3289.98	21.850
7.70 % B LTD	CRISIL AAA	NCD	3,200,000	98.5139	3182.00	21.133
D Ltd (15/May/2024)	ICRA A1+	CP	3,200,000	98.3641	3147.65	20.904
7.65 % E LTD	CRISIL AA	NCD	3,200,000	98.6757	2960.27	19.660
Cash/Cash Equivalents					114.47	0.760
Net Assets					<b>12694.37</b>	
Unit Capital (no of units)					<b>1000.00</b>	
NAV (Rs)					<b>12.6944</b>	

**Segregated Portfolio as on 31st March 2025**

Security Price	Rating	Type of the Security	Qty	Per Unit (Rs)	Market Value (Rs. in Lacs)	% of Net Assets
<b>7.65 % C Ltd</b>	<b>CRISIL B*</b>	<b>NCD</b>	<b>3,200,000</b>	<b>73.843</b>	<b>2362.97</b>	<b>15.693</b>
Unit Capital (no of units)					<b>1000.00</b>	
NAV (Rs)					<b>2.3630</b>	

**Value of Holding of Mr. X after creation of Segregated Portfolio**

	Segregated Portfolio	Main Portfolio	Total Value (Rs.)
<b>No of units</b>	1000	1000	
<b>NAV(Rs)</b>	2.3630	12.6944	
<b>Total value</b>	2362.97	12694.33	15057.30

Investors may note the essential difference between a segregated portfolio and non-segregated portfolio as follows:

Where the portfolio is not segregated, the transactions will continue to be processed at NAV based prices. There will be no change in the number of units remaining outstanding.

- Where the portfolio is segregated, equal number of units are created and allotted to reflect the holding for the portion of portfolio that is segregated.
- Once the portfolio is segregated, the transactions will be processed at NAV based prices of main portfolio.

- Since the portfolio is segregated for distressed security, the additional units that are allotted cannot be redeemed. The units will be listed on the recognised stock exchange to facilitate exit to unit holders.
- Upon realisation of proceeds under the distressed security either in part or full, the proceeds will be paid accordingly. Based on the circumstances and developments, the AMC may decide to write off the residual value of the segregated portfolio.
- Unitholders may also note that the process followed by the AMC/Trustees regarding creation of segregated portfolios shall be in accordance with the provisions laid down by SEBI in this regard, from time to time.

#### **4. Short selling/stock lending**

##### **a) Short Selling by the Mutual Fund**

Short-selling is the sale of shares which are not owned by the seller at the time of trade. Instead, he borrows it from someone who already owns it. Later, the short seller buys back the stock he shorted and returns the stock to close out the loan. If the price of the stock corrects, Short seller can buy the stock back for less than he received for selling it and earn profit (the difference between higher short sale price and the lower purchase price). If the price of stock appreciates, short selling results in loss. Thus, Short positions carry the risk of losing money and these losses may grow theoretically unlimited if the price increases without limit and shall result into major losses in the portfolio. The Mutual Fund may engage in short selling of securities in accordance with the framework relating to short selling and securities lending and borrowing specified by SEBI.

##### **b) Stock Lending by The Mutual Fund**

Subject to the SEBI (MF) Regulations, Securities Lending Scheme, 1997 and in accordance with clause 12.11 of Master Circular dated June 27, 2024, as may be amended from time to time, the Mutual Fund may, if the Trustee permits, engage in Stock Lending. Stock Lending means the lending of stock to another person or entity for a fixed period of time, at a negotiated compensation in order to enhance returns of the portfolio. The securities lent will be returned by the borrower on the expiry of the stipulated period. The exposure limits with regard to stock lending for various Schemes, shall be as specified in the respective Scheme Information Documents (SID) from time to time. The Mutual Fund may not be able to sell such lent out securities and this can lead to temporary illiquidity. Please refer to respective SID for details.

#### **H. Transaction Charges and Stamp Duty**

##### **Transaction Charges-**

Transaction charges have been removed pursuant to SEBI Circular No. SEBI/HO/IMD/PoD1/CIR/P/2025/115 dated August 08, 2025.

##### **Stamp Duty-**

A stamp duty @0.005% of the transaction value would be levied on applicable mutual fund transactions, with effect from July 01, 2020. Pursuant to levy of stamp duty, the number of units allotted on purchase transactions (including dividend reinvestment) to the unitholders would be reduced to that extent.

Stamp duty shall also be applicable on the transfer of mutual fund units, including but not limited to transfers between demat accounts, off-market transfers, and other similar transactions. The applicable rate for such transfers is 0.015%, which shall be levied and collected by the respective Depositories in accordance with the Indian Stamp Act and applicable rules. The rate and levy of stamp duty may vary as amended from time to time. The stamp duty shall be deducted from the net investment amount, i.e., the gross investment amount less any other applicable deductions. Units will be created only for the balance amount, i.e., the net investment amount as reduced by the stamp duty.

#### **I. Requirement of minimum number of investors in a scheme**

Pursuant to paragraph 6.11 of SEBI Master Circular on Mutual Funds dated June 27, 2024, the Scheme shall have:



- I. minimum of 20 investors and
- II. no single investor shall account for more than 25% of the corpus of the Scheme.

In case the Scheme does not have a minimum of 20 investors, the provisions of Regulation 39(2)(c) of the SEBI (MF) Regulations, 1996 would become applicable automatically without any reference from SEBI and accordingly the Scheme shall be wound up and the units would be redeemed at applicable NAV. The two conditions mentioned above shall also be complied within each subsequent calendar quarter thereafter, on an average basis, as specified by SEBI. If there is a breach of 25% limit by any investor over the quarter, a rebalancing period of one month would be allowed and thereafter the investor who is in breach of the rule shall be given 15 days' notice to redeem his exposure over 25% limit. Failure on the part of the said investor to redeem his exposure over 25% limit within the aforesaid 15 days would lead to automatic redemption by the Mutual Fund on the applicable Net Asset Value on the 15th day of the notice period. The Fund shall adhere to the requirements prescribed by SEBI from time to time in this regard.

#### **X. DISCLOSURES AND REPORTS BY THE FUND**

##### **1) Account Statements/Consolidated Account Statement**

1. An allotment confirmation specifying the units allotted shall be sent by way of email and/or SMS within 5 working days of the closure of the NFO Period/date of receipt of valid request during continuous offer period to the Unit holder's registered e-mail address and/or mobile number (whether units are held in demat mode or in account statement form).
2. The holding(s) of the beneficiary account holder for units held in demat mode will be shown in the statement issued by respective Depository Participants (DPs) periodically.
3. A Consolidated Account Statement (CAS) detailing all the transactions across all mutual funds and holdings at the end of the month and securities held in dematerialized form across demat accounts, if applicable shall be sent to the Unit holders in whose folio(s) transaction(s) have taken place during the month on registered email address on or before 12th of the succeeding month and by 15th of the succeeding month for those who have opted for physical copy.
4. Half-yearly CAS shall be issued to all investors providing the prescribed details across all schemes of mutual funds and securities held in dematerialized form across demat accounts, if applicable, at the end of every six months (i.e. September/March) on or before 18th day of succeeding month on registered email address and 21st day of succeeding month through physical copy for those who do not have registered email addresses.
5. Half yearly CAS will not be sent to those Unit holders who do not have any holdings in the schemes of mutual fund and where no commission against their investment has been paid to distributors, during the concerned half-year period.
6. The periodical CAS will be sent by the Depositories to investors holding demat accounts (whether or not units are held in demat form) referred to as "SCAS" and by Mutual Fund Industry to other investors referred to as "MF-CAS". The periodical CAS are issued on the basis of Permanent Account Number (PAN). Thus, CAS shall not be received by the Unit holders for the folios not updated with PAN. Unit holders are therefore requested to ensure that the folios are updated with their PAN/KYC details.
7. For folios of the Fund not included in the CAS (due to non-availability of PAN), the AMC shall issue the necessary account statements within prescribed timeline by mail or email.
8. In the event the account has more than one registered holder, the first named Unit holder shall receive the CAS/account statement.
9. The Unit holder may request for a physical account statement without any charges by writing to/calling the AMC/ISC/RTA. The Mutual Fund/AMC shall dispatch an account statement within 5 working days from the date of the receipt of request from the Unit holder.

Pursuant to clauses 14.4.3 and 11.3 of SEBI Master Circular dated June 27, 2024, the following additional disclosures will be provided in the CAS issued to the investors:

- Each CAS/SCAS shall also provide the total purchase value/cost of investment in each scheme. Further, whenever distributable surplus is distributed, a clear segregation between income distribution (appreciation on NAV) and capital distribution (Equalization Reserve) shall be suitably disclosed.
- CAS/SCAS issued for the half-year (ended September/ March) shall also provide
  - (i) the amount of actual commission paid by the AMC/Fund to distributors (in absolute terms) during the half-year period, and
  - (ii) the scheme's average Total Expense Ratio (in percentage terms) along with the break up between Investment and Advisory fees, Commission paid to the distributor and Other expenses for the half-year period for the scheme's applicable Option (regular or direct or both) where the concerned investor has actually invested in.
- The term 'commission' refers to all direct monetary payments and other payments made in the form of gifts/rewards, trips, event sponsorships etc. by the AMC/Fund to distributors. The commission disclosed is gross commission and does not exclude costs incurred by distributors such as Goods & Service Tax (wherever applicable, as per existing rates), operating expenses, etc.

**Further information pertaining to SCAS sent by Depositories:**

- CAS shall be dispatched by the Depositories/MFs as per the rules specified by SEBI from time to time.

## **2) Half Yearly Disclosures/Portfolio Disclosures/Financial Results**

### **Fortnightly Disclosures (applicable to open-ended debt schemes)**

The AMC will disclose portfolio (along with ISIN and other prescribed details) of the Scheme, in the prescribed format, on fortnightly basis on its website viz. <https://www.abakkusmf.com/statutory-disclosures.html#> and on the website of Association of Mutual Funds in India (AMFI) viz. [www.amfiindia.com](http://www.amfiindia.com) within 5 days of every fortnight.

### **Monthly and Half yearly Disclosures**

The AMC will disclose portfolio (along with ISIN and other prescribed details) of the Scheme, in the prescribed format, as on the last day of the month/half-year i.e. March 31 and September 30, on its website viz. <https://www.abakkusmf.com/statutory-disclosures.html#> and on the website of Association of Mutual Funds in India (AMFI) viz. [www.amfiindia.com](http://www.amfiindia.com) within 10 days from the close of each month/half-year respectively. In case of unitholders whose e-mail addresses are registered, the Mutual Fund/AMC will send via email both the monthly and half-yearly statement of scheme portfolio within 10 days from the close of each month/half-year respectively. AMC will provide a physical copy of the statement of its Scheme portfolio, without charging any cost, on specific request received from a unitholder.

The AMC shall publish an advertisement in an all India edition of one national English daily newspaper and one Hindi newspaper, every half year, disclosing the hosting of the half-yearly statement of its schemes' portfolio on the website of the Mutual Fund and AMFI and the modes through which unitholder(s) can submit a request for a physical or electronic copy of the statement of scheme portfolio.

## **3) Half Yearly Results**

The Mutual Fund shall host half yearly disclosures of the Scheme's' unaudited financial results in the prescribed format on its website viz. <https://www.abakkusmf.com/statutory-disclosures.html#> and on the website of Association of Mutual Funds in India (AMFI) viz. [www.amfiindia.com](http://www.amfiindia.com) within one month from the close of each half year i.e. on 31st March and on 30th September and shall publish an advertisement in this regard 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.

## **4) Annual Report**

Scheme Annual report or Abridged Summary in the format prescribed by SEBI, will be hosted on the website of the Fund viz. <https://www.abakkusmf.com/statutory-disclosures.html#> and on the website of Association of Mutual

Funds in India (AMFI) viz. [www.amfiindia.com](http://www.amfiindia.com) as soon as may be but not later than four months from the date of closure of the relevant accounts year (i.e. 31st March each year). Mutual Fund/AMC will publish an advertisement every year, in the all India edition of at least two daily newspapers, one each in English and Hindi, disclosing the hosting of the Scheme wise Annual Report on the website of the Fund and on the website of AMFI. Mutual Fund/AMC will e-mail the Scheme Annual Report or Abridged Summary thereof to those unitholders, whose email addresses are registered with the Mutual Fund. Investors who have not registered their email id will have an option of receiving a physical copy of the Annual Report or Abridged Summary thereof.

AMC will provide a physical without charging any cost, on specific request received from a unitholder through any mode. A physical copy of the scheme wise annual report shall be made available for inspection to the investors at the registered office of the AMC.

For further details on periodic disclosures, refer to SID/ KIM.

**Notes:**

1. The Statement of Additional Information ('SAI') will be uploaded by Abakkus Mutual Fund on its website (<https://www.abakkusmf.com>) and on AMFI website ([www.amfiindia.com](http://www.amfiindia.com)). The printed copy of SAI will be made available to the investor on request.
2. SAI will be updated within 3 (three) months from the end of each financial year and filed with SEBI.
3. Any material changes to SAI will be made on an ongoing basis by Abakkus Mutual Fund by updating SAI on its website (<https://www.abakkusmf.com/>) and on AMFI website ([www.amfiindia.com/](http://www.amfiindia.com/)). SEBI will be intimated of all such changes within 7 (seven) days. The effective date for all such changes will be mentioned in the updated SAI.

**Notwithstanding anything contained in this SAI, the provisions of SEBI (Mutual Funds) Regulations, 1996 and circulars and the guidelines thereunder shall be applicable.**